

PEEL: Police legitimacy (including leadership) 2017

An inspection of Wiltshire Police



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Introduction

As part of its annual inspections into police effectiveness, efficiency and legitimacy (PEEL), HM Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS)¹ assesses the legitimacy and leadership of police forces across England and Wales.

Police legitimacy – a concept that is well established in the UK as ‘policing by consent’ – is crucial in a democratic society. The police have powers to act in ways that would be considered illegal by any other member of the public (for example, by using force or depriving people of their liberty). Therefore, it is vital that they use these powers fairly, and that they treat people with respect in the course of their duties.

Police legitimacy is also required for the police to be effective and efficient: as well as motivating the public to co-operate with the police and respect the law, it encourages them to become more socially responsible. The more the public supports the police by providing information or by becoming more involved in policing activities (such as via Neighbourhood Watch or other voluntary activity), the greater the reduction in demand on police forces.

To achieve this support – or ‘consent’ – the public needs to believe that the police will treat them with respect and make fair decisions (while taking the time to explain why they are making those decisions), as well as being friendly and approachable.² This is often referred to as ‘procedural justice’. Police actions that are perceived to be unfair or disrespectful can have an extremely negative effect on police legitimacy in the eyes of the public.

Police officers and staff are more likely to treat the public with fairness and respect if they feel that they are being treated fairly and respectfully, particularly by their own police force. Therefore, it is important that the decisions made by their force about matters that affect them are perceived to be fair.³ This principle is described as

¹ This inspection was carried out before 19 July 2017, when HMIC also took on responsibility for fire & rescue service inspections and was renamed HM Inspectorate of Constabulary and Fire & Rescue Services. The methodology underpinning our inspection findings is unaffected by this change. References to HMICFRS in this report may relate to an event that happened before 19 July 2017 when HMICFRS was HMIC. Citations of documents which HMIC published before 19 July 2017 will still cite HMIC as the publisher.

² *It's a fair cop? Police legitimacy, public cooperation, and crime reduction*, National Policing Improvement Agency, September 2011. Available at:
http://whatworks.college.police.uk/Research/Documents/Fair_cop_Full_Report.pdf

³ *Fair cop 2: Organisational justice, behaviour and ethical policing*, College of Policing, 2015. Available at:
http://whatworks.college.police.uk/Research/Documents/150317_Fair_cop%20FINAL_REPORT.pdf

'organisational justice', and HMICFRS considers that, alongside the principle of procedural justice, it makes up a vital aspect of any assessment of police legitimacy.

One of the most important areas in which internal organisational justice and external procedural justice principles come together is the way in which police forces ensure that their workforce behaves ethically and lawfully. In HMICFRS' 2017 legitimacy inspection, we continued our assessment of how well forces develop and maintain an ethical culture and we re-examined how forces deal with public complaints against the police. How this is done needs to be seen to be fair and legitimate in the eyes of both the police workforce and the general public.

As part of this year's inspection, we also integrated aspects of leadership into our assessment of legitimacy, as the two areas are closely linked. We assessed the role that leadership plays in shaping force culture, the extent to which leadership teams act as role models, and looked at how the force identifies and selects its leaders.

While our overarching legitimacy principles and core questions remain the same as last year, our areas of specific focus continue to change to ensure we are able to assess a full range of police legitimacy topics, including emerging concerns or Home Office commissions. As such, it is not always possible to provide a direct comparison with last year's grades. Where it is possible to highlight emerging trends in our inspection findings between years, we do so in this report.

A separate report on the force's efficiency inspection findings is available on our website (www.justiceinspectorates.gov.uk/hmicfrs/peel-assessments/peel-2017/wiltshire/efficiency/). Our reports on police effectiveness will be published in early 2018. Our 2016 reports on forces' effectiveness, efficiency, and legitimacy are available on our website: www.justiceinspectorates.gov.uk/hmicfrs/peel-assessments/peel-2016/wiltshire/.

More information on how we inspect and grade forces as part of this wide-ranging inspection is available on our website (www.justiceinspectorates.gov.uk/hmicfrs/peel-assessments/how-we-inspect/).

Force in numbers



Workforce

Total workforce (full time equivalents) as of 31 March 2017

1,959

Total workforce breakdown (full time equivalents) as of 31 March 2017

officers

staff (including section 38)

PCSOs

983

870

106



Ethnic diversity

Percentage of BAME in workforce 31 March 2017

overall workforce

1.5%

officers

1.5%

staff

1.5%

PCSOs

1.8%

Percentage of BAME in local population, 2011 Census

5.5%



Gender diversity

Percentage of females in overall workforce 31 March 2017

48%

England and Wales population, 2015 estimate

51%

Percentage of females by role 31 March 2017

Wiltshire Police

officers

35%

staff

65%

PCSOs

52%



Grievances

Number of grievances per 1,000 workforce raised and finalised 10 months to 31 March 2017

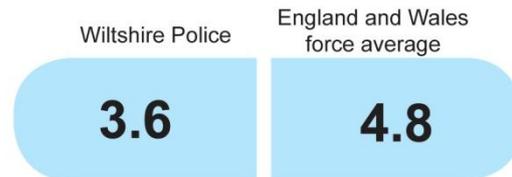


Stop and search

Number of stops and searches carried out in 2015/16 (excluding 'vehicle only' searches)

2,533

Number of stop and searches per 1,000 population in 2015/16



Note: All figures exclude section 38 staff unless stated otherwise. For further information about the data used, including information about section 38 staff, please see annex A.

Overview – How legitimate is the force at keeping people safe and reducing crime?

Overall judgment⁴



Wiltshire Police is judged to be good at how legitimately it keeps people safe and reduces crime. For the areas of legitimacy we assessed this year, our overall judgment is the same as last year. The force is judged to be good at treating all of the people it serves with fairness and respect. It is judged to be good at ensuring its workforce behaves ethically and lawfully and good at treating its workforce with fairness and respect.

Overall summary

To what extent does the force treat all of the people it serves with fairness and respect?



How well does the force ensure that its workforce behaves ethically and lawfully?



To what extent does the force treat its workforce with fairness and respect?



Wiltshire Police is committed to the principle that the behaviour of its workforce has a profound effect on community perceptions of fairness and respect. Improving communication skills forms an important part of training courses and it is clear that that this is having a positive effect on interactions with the public. However, the force needs to do more to ensure frontline officers and staff have an understanding of unconscious bias. The force has hate crime and stop and search scrutiny panels which provide external scrutiny and challenge for its decision making, and additional external bodies give advice on the policing of significant operations. However, as we also found in our 2016 legitimacy inspection, the force does not work with independent advisory groups (IAGs). We found significant progress was being made to introduce local and force level independent advisory groups from September 2017, but they were not in place at the time of our inspection.

⁴ HMICFRS judgments are outstanding, good, requires improvement and inadequate.

Ethical standards are a high priority in the force and the members of the chief officer team provide good role models of these standards. The force has a number of programmes to build on the progress it has made, including the involvement of over 100 frontline officers and staff in developing an ethics and culture board chaired by a leading academic. The force is good at keeping complainants updated and it generally identifies, responds to and investigates allegations of discrimination well, in line with Independent Police Complaints Commission (IPCC) guidelines.

The force has new initiatives to support workforce wellbeing and resolve workforce concerns, including a strong commitment to address workforce disproportionality. The force has effective ways for senior leaders to seek feedback and challenge from the workforce, and it has effective methods for identifying and resolving workforce concerns. The force has established a comprehensive programme of leadership training and development, although it has more work to do to improve how it manages the individual performance of its workforce.

Areas for improvement

- The force should ensure that it seeks and uses external challenge through independent advisory groups at force and local levels to help it improve the way it treats people with fairness and respect.
- The force should ensure that officers and supervisors understand and record grounds that are reasonable when stop and search powers are used.
- The force should ensure that the complaints system is accessible to all sections of the community; this should include individuals who have less trust and confidence in the police and people who experience cultural or language barriers.

To what extent does the force treat all of the people it serves with fairness and respect?

College of Policing research suggests that, in the eyes of the public, police legitimacy stems primarily from the concept of ‘procedural justice’: the expectation that officers will treat the public respectfully and make fair decisions (explaining their reasons openly and clearly), while being consistently friendly and approachable.⁵

While HMICFRS recognises that police legitimacy stems from broader experiences of the police than by direct contact alone, our inspection focuses specifically on assessing the extent to which forces make fair decisions and treat people with respect during their interactions with the public. To do this, we looked at how well leaders can demonstrate the importance they place on procedural justice and how well the workforce understands these principles and applies them. Also, we assessed how well the force scrutinises the extent to which procedural justice takes place, particularly with regard to coercive powers, including the use of force and stop and search.

To what extent does the force understand the importance of treating people with fairness and respect?

HMICFRS assessed the extent to which leaders of the force understand the importance of procedural justice, and the arrangements they have made to provide the workforce with the knowledge, skills and understanding they need to treat all the people they serve fairly and with respect. We examined the workforce’s understanding of the principles of procedural justice (being friendly and approachable, treating people with respect, making fair decisions, and taking time to explain these decisions). We did this by checking their understanding of the concept of unconscious bias,⁶ their awareness of effective communication skills⁷ in all

⁵ *It’s a fair cop? Police legitimacy, public cooperation, and crime reduction*, National Policing Improvement Agency, September 2011. Available at: http://whatworks.college.police.uk/Research/Documents/Fair_cop_Full_Report.pdf

⁶ Personal biases are influenced by factors including people’s background, personal experiences and occupational culture, and they can affect our decision-making. When we make quick decisions, these biases can, without us realising, disadvantage particular groups of people. It is vital that police officers understand their own biases and how to overcome them, to ensure the decisions they make are fair.

⁷ Research into the effect of communication skills training in Greater Manchester Police (e.g. showing empathy, building rapport, signposting and using positive and supportive language) showed this improved officer attitudes and behaviours and had a “significant positive effect” on the quality of interactions between police officers and victims. See: <http://library.college.police.uk/docs/college-of-policing/Technical-Report.pdf>

interactions with the public and their appropriate use of coercive powers (with a specific focus on stop and search and use of force).⁸

Understanding the importance of treating people with fairness and respect

Wiltshire Police is good at understanding the importance of treating people with fairness and respect. The force is a values-based organisation and has firmly established ethics and values. Its five core values are: personal responsibility; professionalism; teamwork; people first; honesty and integrity. Treating people fairly and with respect is fundamental to the force's values, which are aligned with the police Code of Ethics.⁹

Chief officers are visible to the workforce and communicate the values they expect from officers and staff in many ways, including blogs, leadership events and regular chief constable road shows. Officers and staff spoke positively of these events and the importance of using the force's values in their interactions with the public.

We found clear evidence of the force's values influencing daily activities, such as decisions to promote officers and staff, and also staff recruitment, training, leadership development and annual staff appraisals. We found that values are well established and understood throughout the workforce. This means that members of the public are more likely to be treated with fairness and respect. Our findings are consistent with last year's legitimacy inspection, when we assessed Wiltshire Police to be good at treating the people it serves with fairness and respect.

The people, culture and inclusion strategy outlines the commitment the force is making to ensure the workforce feel valued. The strategy details the investment in key areas including quality, leadership, engagement, high standards and the effective use of resources from 2016 to 2018. It is clear from officers and staff we spoke to that the force is making good progress with this commitment.

⁸ *Authorised Professional Practice on Stop and Search*, College of Policing, February 2017. Available from: www.app.college.police.uk/app-content/stop-and-search/; *Authorised Professional Practice on Use of Force*, College of Policing, October 2013. Available from: www.app.college.police.uk/app-content/public-order/core-principles-and-legislation/police-use-of-force/; and *College of Policing and National Police Chiefs' Council, Personal safety manual*, 2016. Available from: <http://library.college.police.uk/docs/college-of-policing/PSM/PSM-MOD-01-INTRODUCTION.pdf>

⁹ *Code of Ethics: A Code of Practice for the Principles and Standards of Professional Behaviour for the Policing Profession of England and Wales*, College of Policing, 2014. Available from: www.college.police.uk/What-we-do/Ethics/Pages/Code-of-Ethics.aspx

Understanding of unconscious bias

Wiltshire Police could improve the workforce's understanding of unconscious bias and how to overcome it during their decision making. The force provides unconscious bias training for new staff and in refresher training for officers and staff, for example in stop and search refresher training, which was being provided at the time of our inspection. We also found that staff working in the human resources department received this training. Most officers and staff we spoke to showed an understanding of unconscious bias and how they use the force's values to avoid bias in their decision making. However, this understanding was not universal; we found that some frontline officers and staff were uncertain of its relevance in their day-to-day work.

Communication skills

The workforce in Wiltshire Police have a good understanding of communication skills, such as effective listening, empathy and explaining decisions and actions, and how to use these effectively when dealing with the public. These skills are an integral part of many training courses, such as for new recruits, leadership development, personal safety, specialist interviewing and for staff in specialist roles, such as those who carry Taser or specialise in dealing with public disorder. A number of these courses include practical exercises and peer feedback to develop skills. Officers and staff we spoke to frequently referred to the force value to 'put people first' as a strong influence when dealing with the public, and we found many examples of good communication skills breaking down barriers with vulnerable people. For example, a detention officer used calming communication with an aggressive male and a police community support officer (PCSO) reassured a person in crisis by showing them empathy and understanding. A force that is able to demonstrate knowledge and use of effective communication skills is likely to gain the trust and confidence of the communities it serves.

Use of coercive powers

HMICFRS also examined how officers used powers directing people to modify their behaviour and when using force for arrest and restraint. Forces frequently refer to these as coercive powers. Wiltshire Police is good at understanding how to use coercive powers fairly and respectfully. Officers and staff receive practical, online and classroom-based training on the use of their powers and this training is refreshed annually. In addition, officers who carry Taser, firearms or are specifically trained in dealing with public disorder receive enhanced training. The National Decision Model,¹⁰ Code of Ethics and force values feature throughout these training

¹⁰ The police service has adopted a single, national decision model (NDM). This helps everyone in policing make decisions and provides a framework in which decisions can be examined and challenged, both at the time and afterwards. The Code of Ethics is at the centre of this model. For more information see www.app.college.police.uk/app-content/national-decision-model/

programmes. If legislation changes, the force provides guidance to its workforce through email updates and the force intranet, as was the case for the recent change to College of Policing authorised professional practice on the use of stop and search powers. Officers and staff were able to demonstrate clearly their understanding of the National Decision Model, the force's values and behaviours when using coercive powers. This means they have a good understanding of the importance of treating people with fairness and respect.

How well does the force understand the extent to which its workforce treats people with fairness and respect?

HMICFRS continues to examine the extent to which forces work to identify and understand what affects people's perceptions of fair and respectful treatment. This year we re-assessed a specific aspect of fair and respectful treatment that we examined in PEEL 2015: the use of force¹¹ and stop and search powers. Specifically, we inspected the extent to which forces record data and how well they scrutinise data and other information, including through external scrutiny,¹² to understand and improve the use of these powers. In the case of stop and search, the next section sets out our findings. It includes our assessment of the reasonableness of recorded grounds for stop and search.

Scrutiny of use of force to improve treatment

Wiltshire Police is good at scrutinising the use of force by its officers and staff. When force is used, officers and staff are required to complete a standardised national form which complies with the national minimum recording standard. Since our inspection in 2016, a use of force board, chaired by a senior officer, has been formed to improve force governance and scrutiny in this area. The board meets quarterly to review a wide range of data to understand how and why force was used by officers and staff. This includes whether the person was under the influence of drink, drugs

¹¹ In 2015 HMICFRS found a generally positive picture of force oversight arrangements for use of Taser. However, in 2016, we found that many forces did not have similar levels of oversight for other types of use of force. As a result of a review undertaken by the National Police Chiefs' Council, all forces have been required to collect a minimum data set in respect of use of force since April 2017. The review is available at: www.npcc.police.uk/documents/uniformed/2016/Use%20of%20Force%20Data%20Report%20to%20Home%20Sec.pdf. Also see *Authorised Professional Practice on Use of Force*, College of Policing, October 2013. Available from: www.app.college.police.uk/app-content/public-order/core-principles-and-legislation/police-use-of-force/

¹² *Independent Advisory Groups: considerations and advice for the police service on the recruitment, role and value of IAGs*, College of Policing, 2015. Available at: www.college.police.uk/What-we-do/Support/Equality/Documents/Independent_advisory_groups_advice_2015.pdf

or suffering from mental ill health at the time force was used; the tactics used by the officers; the gender of the person involved; the type and location of the incident resulting in the use of force and the number of officers or staff in attendance.

The force has similar established governance structures in place to monitor and review the use of Taser and firearms by officers; any identified issues are referred to the force professional standards department (PSD) for further review. Wiltshire Police is in the process of equipping relevant officers and staff with body-worn video cameras and we were informed that this would be completed by the end of 2018.

External scrutiny to improve treatment

Wiltshire Police is making progress in its use of external scrutiny to improve how it treats people with fairness and respect. An established scrutiny group, led by the police and crime commissioner (PCC), provides feedback and constructive challenge to the force's management of hate crime. The group includes members from 18 support organisations, communities, charities and other public services. In addition, we found evidence of the force working with external groups to advise on the tactics used at certain police operations. The support provided to the force by the external stop and search scrutiny panel also helps to ensure that the law is applied fairly and that members of the public are treated with respect.

The force has made slow progress in establishing independent advisory groups (IAGs), which are typically groups made up of community leaders and other people who have an interest in helping the police improve their services, including bringing objective challenge and a greater insight into the effect of police tactics on communities. The force's work to build on community networks already established within local policing teams is progressing, with the introduction of local and strategic IAGs throughout the force. Although not in place at the time of our inspection, we are reassured by the comprehensive plans, which include implementing a Swindon-based IAG from September 2017.

Membership of the Swindon IAG is diverse and representative of the local community. With clear terms of reference, planned induction and training, the group will be able to advise and challenge the force on policy, procedures and the issues affecting the local community. A superintendent is leading this work, which also aims to implement a local IAG in the force's six local community policing teams, an overarching strategic IAG and a virtual IAG, using social media channels, by November 2017. Nevertheless, we highlighted this gap in our 2016 inspection and consider that the force has made insufficient progress in this respect over the past year. HMICFRS will watch with interest the progression and evaluation of this work.

The force is developing its use of virtual public meetings through its established Facebook account. Introduced in May 2017, live public meetings with the online community are chaired by a chief officer and provide an opportunity for feedback on policing services. This is a new initiative and although providing the potential to

connect with the force Facebook community of 36,000 people, it is too early to assess the effectiveness of this or the force's response to feedback. The force has an established public service quality board, chaired by a chief officer, to co-ordinate existing and develop new public consultation methods. Since our inspection in 2016, the structure of the public service quality board has changed and it is now aimed at improving public engagement and feedback. The new public service quality board meets bi-monthly in the local community and provides members of the public with direct access to chief officers, senior leaders and community policing teams. Public views, feedback and challenge are sought during these meetings and local senior leaders are responsible for providing feedback on action taken. There had been eight board meetings by the time of our inspection, some of which were attended by over 40 members of the public. Surveys have been used during public service quality board meetings to seek feedback on how the force can improve the service provided to communities. The surveys have high return rates and responses are collated and reviewed by the force continuous improvement team.

How fairly does the force use stop and search powers?

The purpose of stop and search powers is to enable officers to eliminate or confirm suspicions that individuals may be in possession of stolen or prohibited items, without exercising their power of arrest. Except in exceptional circumstances, an officer must have reasonable grounds for carrying out such a search. While this can be valuable in the fight against crime when based on genuinely objective reasonable grounds, the powers to stop and search people are some of the most intrusive available to the police. Their disproportionate use in respect of black, Asian and minority ethnic communities threatens to undermine police legitimacy. As such, it is crucial that all forces use these powers fairly, and demonstrate to the public that they are doing this.¹³

HMICFRS has assessed the police's use of its stop and search powers on a number of occasions.¹⁴ Our 2015 legitimacy inspection¹⁵ found that too many forces were not always recording reasonable grounds on their stop and search records. In 2017, we

¹³ *Authorised Professional Practice on Stop and Search*, College of Policing, February 2017. Available from: www.app.college.police.uk/app-content/stop-and-search/

¹⁴ *Stop and Search Powers – are the police using them effectively and fairly?* HMIC, July 2013. Available at: www.justiceinspectorates.gov.uk/hmicfrs/publications/stop-and-search-powers-20130709/ and *Best Use of Stop and Search revisits*, HMIC, September 2016. Available from: www.justiceinspectorates.gov.uk/hmicfrs/publications/best-use-of-stop-and-search-revisits/

¹⁵ *Police legitimacy 2015 – a national overview*, HMIC, February 2016. Available from: www.justiceinspectorates.gov.uk/hmicfrs/publications/police-legitimacy-2015/

reviewed the reasonableness of the grounds again to assess how fairly forces are using stop and search in line with national guidance.¹⁶ Also, we assessed how the forces scrutinise use of these powers.

Understanding national guidance

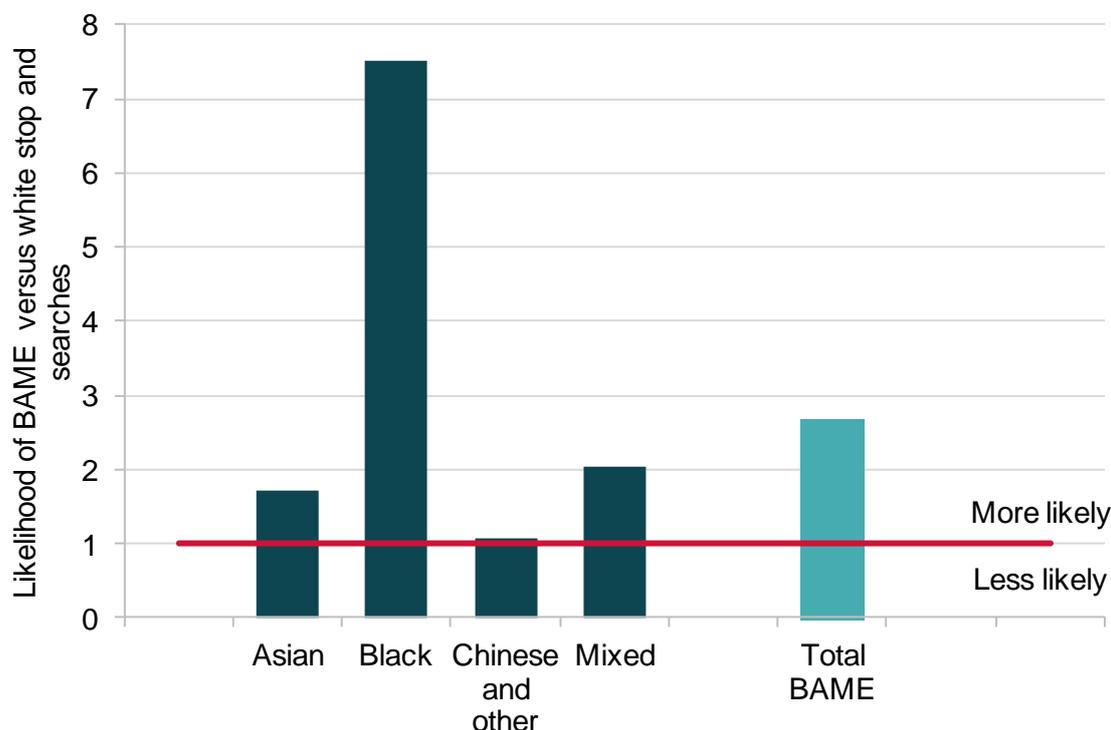
Officers in Wiltshire Police who exercise these powers have received training and guidance on how to use them fairly and respectfully. This training is provided during probationer and annual personal safety training, and includes reference to the National Decision Model (see above). Officers receive training on how to use these powers only to the extent that it is necessary, proportionate and reasonable in all circumstances, in line with the Code of Ethics. The newly introduced College of Policing stop and search training package contains reference to authorised professional practice, abuse of powers and reasonable grounds for the use of force, and the force is providing this training to relevant staff. We were told that the workforce had been updated on changes made to authorised professional practice that clarify circumstances that constitute reasonable grounds for exercising these powers. While the force provides this training, some officers and staff we spoke to were unclear as to the nature of these changes. The results of our review of 200 stop and search records also suggest that some officers and supervisors still do not understand what constitutes reasonable grounds for a stop and search (see below).

Monitoring use of stop and search powers to improve treatment

In order to monitor the use of stop and search powers effectively, forces should use a range of data to help them understand how the powers are being used and the subsequent effect on crime, disorder and perceptions in the community. In particular, forces should consider whether the use of stop and search powers is disproportionately affecting one group compared with another. In 2015/16 in the local population of Wiltshire Police, black, Asian and minority ethnic (BAME) people were 2.7 times more likely to be stopped and searched than white people. Black people were 7.5 times more likely to be stopped and searched than white people, which is the greatest difference in any ethnic group in the force area when considering the likelihood of being stopped and searched compared with white people.

¹⁶ See annex A for more information about the methodology for our review of stop and search records.

Figure 1: Likelihood of black, Asian and minority ethnic (BAME) people being stopped and searched (under section 1, PACE)¹⁷ compared with white people in the local population of Wiltshire Police in the 12 months to 31 March 2016



Source: Home Office 2016

Wiltshire Police has governance arrangements in place to enable effective monitoring and scrutiny of the use of stop and search powers by its officers and staff. An internal scrutiny group, chaired by a senior officer, monitors a comprehensive range of stop and search data to identify instances when stop and search is used too frequently, its use in any community is excessive, or to identify good practice in the use of these powers. This includes the reason why individuals were searched; stop rates per 1,000 population; what was found during the course of a search; and searches by gender, age and ethnicity. We found evidence of force scrutiny processes identifying disproportionately higher searches of black people in certain areas of the force. Further analysis identified that a large proportion of these searches related to specific policing operations. In addition, internal monitoring has identified the need to refresh officers in stop and search legislation, particularly what constitutes reasonable grounds for a search. This was being addressed at the time of our inspection through the provision of force-wide refresher training.

In addition, we found clear monitoring arrangements in place, with every stop and search record checked and endorsed by a supervisor, quarterly dip-sampling of stop and search records by senior leaders and reviews of records involving people stopped and searched many times. An internal scrutiny panel, together with

¹⁷ Police and Criminal Evidence Act 1984. Available at: www.legislation.gov.uk/ukpga/1984/60/section/1

structured daily and quarterly review processes, monitors the use and effectiveness of stop and search legislation throughout the workforce. Clear governance structures mean that officers and staff are more likely to exercise their stop and search powers fairly and respectfully.

The force is in the process of introducing body-worn video cameras for all frontline officers and staff. We were informed that the use of this equipment is compulsory for all stop and search encounters, but we found this was not clearly understood by the workforce, which could mean inconsistent use of body-worn video cameras throughout the force. The use of body-worn video cameras during searches, and the inclusion of a review of footage in the monitoring process, is likely to promote openness, public trust and confidence in the police's use of these powers, and help to assess whether the powers are being used fairly and effectively. Although completion of the force-wide issue of this equipment is not expected until 2018, the force needs to assure itself that it is being used consistently throughout the workforce.

In 2015, HMICFRS inspected all forces on compliance with the Best Use of Stop and Search scheme and found that Wiltshire Police was not compliant with three of the five elements of the scheme. We revisited in 2016 and found that the force had improved but was still not compliant, in that it was not publishing the required data about the outcomes of stop and search and their connection with the original reason for the search. However, this was rectified by the force soon after our 2016 inspection.

External scrutiny of stop and search powers to improve treatment

Wiltshire Police has an external scrutiny group in place to review force-wide use of stop and search powers. The group is chaired by a senior police leader with strategic responsibility for stop and search, which means that it is not completely external or independent. The group has been in place for 12 months and its membership continues to develop. It is provided with a range of data, including gender, age and ethnicity, complaints received and details of records involving officers who conduct proportionally more searches, to identify unfairness or disproportionality. The group is representative of the local community, and members have been provided with training and guidance on stop and search legislation. Group members observe stop and search training and are encouraged to use the ride-along scheme, in which members of the public can observe operational policing in action and provide feedback on their observations of stop and search encounters. HMICFRS observed a meeting of the external scrutiny panel as part of this inspection and although the group was small in size, the diversity of experience, gender and ethnicity of those present was good. However, young people are not represented on the panel and the force is working with Swindon College to ensure that it is engaging young people and

seeking their views on the use of stop and search powers by the force. This work was in its early stages at the time of our inspection and so it is too soon to assess its effectiveness.

The force records all feedback provided by the group and, when appropriate, this is given to individuals and their line managers for learning, or incorporated into force policy or training where organisational learning has been identified. For example, feedback from the external scrutiny panel, together with findings from the internal scrutiny group, has led to further training to reinforce knowledge of the law on use of stop and search, including the grounds required to search individuals. Body-worn video camera footage will be incorporated into the data reviewed by the panel after this equipment has been issued to all relevant members of the workforce in 2018. The force has recently improved its external scrutiny processes and this is likely to increase the force's understanding of how well people are treated when the powers of stop and search are used.

Reasonable grounds for use of stop and search

The Police and Criminal Evidence Act 1984 requires that, to stop and search a person, the grounds to suspect that person of being in possession of a stolen or prohibited article must be reasonable and that the grounds must be recorded on the stop and search record.¹⁸

In our 2013 inspection into the police use of stop and search powers,¹⁹ we were concerned to see that, of the 8,783 stop and search records we examined throughout all forces in England and Wales, 27 percent did not include sufficient reasonable grounds to justify the lawful use of the power. For Wiltshire Police, the 2013 inspection showed that 15 of 200 records reviewed did not have grounds recorded that were considered reasonable. In 2015, as part of our PEEL legitimacy inspection,²⁰ we carried out a further review of the recorded grounds in a sample of stop and search records. In that inspection, our review of 100 records found that nine did not have reasonable grounds recorded.

During our 2017 inspection, we reviewed 200 stop and search records. Fifteen records did not have reasonable grounds recorded. While the records we reviewed may not be representative of all stop and search records completed by the force, our findings indicate some officers and supervisors either still do not understand fully what constitutes reasonable grounds, or do not know how to record them properly. It

¹⁸ Police and Criminal Evidence Act, 1984. Available from: www.legislation.gov.uk/ukpga/1984/60/contents

¹⁹ *Stop and Search Powers: Are the police using them effectively and fairly?* HMIC, 2013. Available from: www.justiceinspectorates.gov.uk/hmic/publications/stop-and-search-powers-20130709/

²⁰ *PEEL: Police legitimacy 2015*, HMIC, 2016. Available from: www.justiceinspectorates.gov.uk/hmicfrs/publications/police-legitimacy-2015/

is important to note that a lack of reasonable grounds on the stop and search record does not necessarily mean that reasonable grounds did not exist in reality at the time of the stop and search.

In 51 of the 200 records we reviewed, the item searched for was found. This is an important measure – confirming or allaying an officer’s suspicions is the primary purpose of the powers. Finding the item searched for is one of the best indications that the grounds for the suspicions are likely to have been strong.

Table 1: Results of HMICFRS stop and search records review 2013-17

	2013	2015	2017
Records not containing reasonable grounds	15 of 200	9 of 100	15 of 200
Item searched for found	–	–	51 of 200

Summary of findings



Good

Wiltshire Police’s leaders clearly understand procedural justice principles and promote the force values and behaviours to improve the extent to which all officers and staff treat the public with fairness and respect. Officers and staff understand the importance of communication skills in their interactions with the public and clearly demonstrate use of these skills, for example when dealing with vulnerable people. The force is also committed to addressing the risks presented by unconscious bias in the workforce. However, unconscious bias training is not provided to all members of the workforce and knowledge of unconscious bias and how to address it in decision making is mixed.

Wiltshire Police continues to develop both internal and external mechanisms to scrutinise the use of force. Firm governance procedures are in place to oversee the use of force by police officers. This ensures that if failings in procedures or any misuse of force are identified, there are measures to hold individuals to account and for the organisation to learn. However, the force has so far failed to introduce an independent advisory group, which would strengthen local and force-wide accountability and scrutiny arrangements. We were reassured to see well-developed plans to introduce independent advisory groups to oversee the use of police powers; this will deepen public scrutiny of the force and will be an area of interest for HMICFRS in future inspections.

Areas for improvement

- The force should ensure that it seeks and uses external challenge through independent advisory groups at force and local levels to help it improve the way it treats people with fairness and respect.
- The force should ensure that officers and supervisors understand and record grounds that are reasonable when stop and search powers are used.

How well does the force ensure that its workforce behaves ethically and lawfully?

In HMICFRS' 2017 legitimacy inspection, we continued to focus on the extent to which forces develop and maintain an ethical culture to reduce unacceptable types of behaviour among their workforces. We also returned to look at how well forces are handling complaints and misconduct cases,²¹ as opposed to last year's focus on how well forces are guarding against corruption.²²

How well does the force develop and maintain an ethical culture?

Research tells us that the best way to prevent wrongdoing is to promote an ethical working environment or culture.²³ Police leaders need to promote ethical principles and behaviour and act as role models, in line with the Code of Ethics.²⁴ Officers and staff should feel confident that they can apply these principles to their decision-making. This year, we focused on the way that the leaders of forces demonstrate ethical behaviour and the way that forces approach ethical decision-making across the entire workforce. In addition, where forces had failed to comply with all aspects of the national vetting standards in 2016, we assessed whether their plans are credible and are likely to be compliant by December 2018.²⁵

²¹ *Police legitimacy 2015 – a national overview*, HMIC, February 2016. Available from: www.justiceinspectors.gov.uk/hmicfrs/publications/police-legitimacy-2015/

²² We did, however, undertake a review of forces' plans in response to our PEEL legitimacy 2016 national report recommendation. The report of our findings is available here: www.justiceinspectors.gov.uk/hmicfrs/publications/peel-police-legitimacy-2016/

²³ *Promoting ethical behaviour and preventing wrongdoing in organisations*, College of Policing, 2015. Available at: http://whatworks.college.police.uk/Research/Documents/150317_Integrity_REA_FINAL_REPORT.pdf
The role of leadership in promoting ethical police behaviour, College of Policing, 2015. Available at: http://whatworks.college.police.uk/Research/Documents/150317_Ethical_leadership_FINAL_REPORT.pdf

²⁴ *Code of Ethics: A Code of Practice for the Principles and Standards of Professional Behaviour for the Policing Profession of England and Wales*, College of Policing, 2014. Available from: www.college.police.uk/What-we-do/Ethics/Pages/Code-of-Ethics.aspx; *Literature review – Police integrity and corruption*, HMIC, January 2015. Available from: www.justiceinspectors.gov.uk/hmicfrs/publications/integrity-matters/

²⁵ HMICFRS' recommendation in December 2016 was that (i) Within six months, all forces not already complying with current national vetting policy should have started to implement a sufficient plan to do so and (ii) Within two years, all members of the police workforce should have received at least the lowest level of vetting clearance for their roles. The ACPO/ACPOS National Vetting Policy was

Leaders as ethical role models

Ethics and values are well established in Wiltshire Police. The force has clearly defined leadership expectations that it continually promotes and that reflect the nine values of the Code of Ethics. The chief constable is the force lead for ethics and reinforces his expectations in a number of ways. For example, he speaks to leaders at chief officer engagement events and the whole workforce at engagement road shows. The chief uses these occasions to reinforce the standards he expects of the workforce and refers to examples of when officers and staff have upheld the values of the force in the most difficult of circumstances. He also talks about his own experiences to illustrate his commitment to ethical standards. Ethical issues are also discussed regularly at senior command team meetings.

The force has developed a learning culture through open and accessible leadership in which reasons for decisions are communicated with the workforce. For example, staff suggestions were sought on how to promote workforce wellbeing, and every member of staff received personal feedback from a senior leader on the outcome of the suggestion they had made. Chief officer gifts, hospitality and business interests are publicised on the force website, but at the time of our inspection this information dated back to 2016. It is clear from our findings that the leadership of the force has a positive effect on the workforce, who feel empowered and involved.

The force is in the process of revising its ethics and culture board to improve staff access to advice and external membership of the board. Over 100 officers and staff volunteered to become involved in shaping the new board. Three ethical dilemma workshops were held early 2017, in which volunteers were encouraged to discuss difficult incidents that they had dealt with in the workplace. We observed an ethical dilemma workshop during which four issues were discussed with good quality conversation and debate. The new board will be chaired by an experienced academic and will include members of the newly formed independent advisory group (IAG) and representatives from local communities to provide an independent view on dilemmas raised. The board had not met at the time of our inspection and although we found that knowledge of the changes was limited, officers and staff we spoke to told us they have confidence in raising ethical concerns or issues with their line managers.

Ethical decision making

Wiltshire Police is good at ethical decision making. Force policy complies with the College of Policing Code of Ethics and equality impact assessments are completed to ensure that all legal requirements are considered. Each policy is quality assured through internal scrutiny, which involves staff associations and legal teams, and consultation with external advisers also takes place. Since 2015, the force has been

replaced in October 2017 by the Vetting Code of Practice and Vetting Authorised Professional Practice. Available at: www.app.college.police.uk/app-content/professional-standards/vetting/

working with an external company to review the work done to promote equality and inclusion throughout the force. All internal force policies were reviewed as part of this work, which provided an opportunity for external scrutiny and challenge.

Our reality testing found that force values and behaviours are firmly established throughout the workforce and routinely influence decision making. These values feature throughout force training programmes, including training for new recruits, annual refresher training for officers and staff and leadership development programmes. Ethical decision making forms part of the force's recruitment, training and promotion processes, annual performance reviews for police officers and staff and work-based assessments for those holding leadership positions. Although the revised ethics and culture board was not in place at the time of our inspection, workshops had been held to support officers and staff in making difficult decisions, and line managers provided advice when needed.

How accessible is the complaints system to all members of the public?

An accessible complaints system is crucial to building public confidence in the police and to a force's ability to improve the extent to which its workforce acts ethically and lawfully. As such, we assessed how easy it is for the public to make a complaint – including how well forces support those people that may require additional help to gain access to the complaints process.²⁶ Also, we used a review of case files to assess the level of information provided to complainants and looked at how well forces keep complainants updated about the progress of their complaints.

Ease of making a complaint

Wiltshire Police is good at making it easy for members of the public to make a complaint. Information is provided online through the force website and through leaflets in public areas of police stations. Complaints can be made in a number of ways, including using the force website, in person at any police station, by letter or telephone and through third parties such as the Independent Police Complaints Commission (IPCC). We found that website information was easily accessible, but information leaflets were limited at some stations we visited. We found posters and leaflets displayed in public areas of police premises, such as custody units and enquiry offices, and they were also available in different languages. Assistance for

²⁶ These could include people with learning difficulties, mental health issues, young people or people whose first language is not English. *IPCC Statutory Guidance to the police service on the handling of complaints*, IPCC, May 2015. Available at:

www.ipcc.gov.uk/sites/default/files/Documents/statutoryguidance/2015_statutory_guidance_english.pdf and *Access to the police complaints system*, IPCC, September 2015. Available at:

www.ipcc.gov.uk/sites/default/files/Documents/research_stats/Access_to_the_police_complaints_system.pdf

people with hearing or sight impairments was also available. We were informed that translation services and hearing assistance were available at police stations to assist people who may require additional support to make a complaint. We examined 25 public complaints that had been recorded by the force, and found two cases where a complainant needed additional support but it had not been provided.

The public service quality board now holds meetings in local community venues, providing the public with direct access to chief officers and senior leaders. Meetings are bi-monthly and are deliberately held in communities where trust and confidence in policing may be low. The force told us these meetings provide the opportunity for public complaints to be raised, but it was not clear how far the force is using these to help people understand how to make a complaint or make the system more accessible to people who may have less trust and confidence in the police.

Keeping complainants updated

Wiltshire Police is good at keeping complainants updated and providing them with the information required by law. When forces record public complaints, the Police Reform Act 2002 and Police (Complaints and Misconduct) Regulations 2012 requires them to provide the complainant with a copy of the complaint record. The IPCC statutory guidance extends this by stating that complainants should receive an explanation of the possible ways the complaint may be dealt with, and that they should be advised of who will be dealing with their complaint (including contact details). As part of this inspection, HMICFRS carried out a case file review which included 25 public complaints. We found that the force had complied with this legal duty in all 25 cases.

Once a public complaint investigation has started, forces have a statutory duty to keep complainants informed of progress every 28 days. We found that regular updates had been provided to complainants in 21 of the 25 case files we examined and that 20 of these updates were sufficiently informative. We assessed 15 misconduct cases and found that 11 of them recorded regular updates to witnesses and those who are the subject of allegations, and all of these updates were found to be sufficiently informative. The number of cases we sampled is small, but the force needs to improve how regularly it updates those involved in internal misconduct cases.

When forces have finished handling a complaint, they are required to provide the complainant with the findings of the investigator's report, the force's determination and the complainant's right of appeal when the case is concluded. We were pleased to see that the force complied with these requirements in 24 out of the 25 cases.

How well does the force identify and investigate potential discrimination by officers and staff?

For the public to have confidence in the police and the police complaints system, it is vital that allegations of discrimination arising from police complaints, conduct matters, and death and serious injury investigations are handled fairly and appropriately. We reviewed complaint, misconduct and grievance files to assess the extent to which forces identify and respond to discrimination appropriately and at the earliest opportunity (including referrals to the IPCC), and the extent to which these allegations are investigated in accordance with the IPCC guidelines for handling allegations of discrimination.²⁷

Identifying and responding to potential discrimination

We found that officers and staff in Wiltshire Police have a good level of knowledge of discrimination and generally identify and respond appropriately to reports of discrimination. There is good governance in place between the professional standards department (PSD) and human resources (HR) to identify discrimination. An appropriate department lead reviews new cases and all cases prior to finalisation to quality assure investigations and to check whether discrimination is identified.

During our case file review, we assessed ten complaints and five internal misconduct cases that the force had identified as containing an allegation of discrimination. We also looked at an additional 15 complaints and ten misconduct cases which we considered might contain unidentified allegations of discrimination. We were pleased to find that none of these cases contained allegations of discrimination which the force had failed to identify.

Police (Complaints and Misconduct) Regulations 2012 requires forces to refer more serious matters to the Independent Police Complaints Commission (IPCC) if they are aggravated because it is alleged that discrimination was a reason for the behaviour. We identified that Wiltshire Police had failed to refer to the IPCC one of the two discrimination cases it had recorded in line with the mandatory referral criteria. The force needs to ensure that all cases involving discrimination are referred to the IPCC.

²⁷ See annex A for more information about our case file review. *IPCC guidelines for handling allegations of discrimination*, IPCC, September 2015. Available at: www.ipcc.gov.uk/sites/default/files/Documents/statutoryguidance/Guidelines_for_handling_allegations_of_discrimination.pdf

Investigating allegations of discrimination

Wiltshire Police is good at investigating allegations of discrimination. The professional standards department (PSD) has established processes for reviewing and monitoring complaints which involve discrimination. All the investigators we spoke to had a good knowledge of the IPCC guidelines setting out standards for investigations of this type. During our case file review, we inspected ten complaints the force had recorded as containing an allegation of discrimination. We found that all ten cases had been satisfactorily handled in accordance with the IPCC guidelines for handling allegations of discrimination. All the complainants received a good service from the force.

The force also gives special consideration to the individual needs of complainants who are the victims of discrimination. For example, specially trained officers are available to interview vulnerable people, and experts in equalities are on hand to give advice when necessary. We were informed of a complaint involving sexual discrimination where the complainant was reluctant to engage with the force. Additional support was provided by an officer experienced in this field, which persuaded the victim to pursue the complaint.

Summary of findings



Good

Ethics and values are firmly established in Wiltshire Police. Senior leaders set standards of force behaviours and values through leadership events and staff forums and use operational examples to role model and reinforce these. The force is improving its process for officers and staff to refer ethical issues. One hundred workforce volunteers are working with the chief officer team to ensure the scheme meets the needs of those using it, although we found that wider knowledge of these changes was limited. The force makes the complaint system easy to access, but it could do more to support those people who may have less trust and confidence in the police. The force is good at keeping complainants updated on the progress of their complaints and it generally identifies and responds appropriately to allegations of discrimination. The force undertakes satisfactory investigations into allegations of discrimination, in line with IPCC guidelines, and provides a good level of overall service to complainants and other interested parties.

Areas for improvement

- The force should ensure that the complaints system is accessible to all sections of the community; this should include individuals who have less trust and confidence in the police and people who experience cultural or language barriers.

To what extent does the force treat its workforce with fairness and respect?

A workforce that feels it is treated fairly and with respect by its employers is more likely to identify with the organisation, and treat the public in a similarly fair and respectful way. Conversely, perceived unfairness within police organisations can have a detrimental effect on officer and staff attitudes and types of behaviour.²⁸ As such, this concept of ‘organisational justice’, and its potential effect on ‘procedural justice’ forms an important part of HMICFRS’ assessment of police legitimacy and leadership. As no comparative data exist on how fairly officers and staff perceive forces have treated them, we continue to focus our assessment on how well forces identify individual and organisational concerns within their workforces and act on these findings.

In our 2017 inspection, we focused specifically on how well forces identify and act to improve fairness at work, including what action they are taking to make their workforces more representative of the communities they serve. We continued to look at how well forces provide for the wellbeing of their workforces, particularly through preventative and early action, and at the way individual performance is managed and developed.

How well does the force identify and act to improve fairness at work?

Research suggests that forces that involve officers and staff in decision-making processes, listen to their concerns, act on them, and are open about how and why decisions were reached, may improve workforce perceptions of fair and respectful treatment.²⁹ HMICFRS assessed how well force leaders seek feedback from their workforces and use this, alongside other data and information – including that on grievances³⁰ – to identify, understand, prioritise and resolve their workforces’

²⁸ *Fair cop 2: Organisational justice, behaviour and ethical policing*, College of Policing, 2015.

Available at:

http://whatworks.college.police.uk/Research/Documents/150317_Fair_cop%202_FINAL_REPORT.pdf and *Organisational justice: Implications for police and emergency service leadership*, Herrington, C. and Roberts, K. ^{AIPM} Research Focus, Issue 2, 2013. Available at: www.aipm.gov.au/wp-content/uploads/2013/08/Org-Justice-Final.pdf

²⁹ *Ibid.*

³⁰ Grievances are concerns, problems or complaints that a member of staff raises formally with an employer, so data on numbers and types of grievances can provide forces with useful information about matters of concern to their workforces.

concerns. Part of our assessment involved reviewing a small number of grievance cases to assess if these adhere to Acas guidance and the Code of Practice.³¹

Unfairness, or perceived unfairness in recruitment processes, opportunities and limited career progression can lead to good officers and staff leaving the service prematurely and fewer women and people from black, Asian and minority ethnic (BAME) communities wanting to join the police in the first place. As such, we re-examined how well forces address disproportional workforce representation in a variety of areas – including recruitment, retention and progression for those people with protected characteristics.³² We looked at the treatment of BAME officers and staff subject to allegations of misconduct – to improve fairness at work and to make forces more representative of the communities they serve.³³

Leaders seeking feedback and challenge from the workforce

Leaders in Wiltshire Police are good at seeking feedback and challenge from the workforce and we found many examples of this during our inspection. We found overwhelming evidence that senior officers, particularly the chief constable, are open to receiving challenge. There are many ways for members of the workforce to give feedback to chief officers, including chief constable staff engagement through road show events, internal online discussion forums, anonymous email and in person. The workforce have confidence that leaders will listen and respond to issues raised and frequently use these communication channels to make suggestions or provide feedback.

Leaders in Wiltshire Police seek challenge, consult the workforce on a range of matters and make changes as a consequence. For example, following feedback, staff associations, including the Black Police Association, are now involved in decisions made at the resource management panel (a panel which deploys staff to different areas of the force) to improve openness. Responsibility for decisions made at the resource management panel has been devolved from chief officers and has empowered leaders to make important decisions relating to the workforce. Similarly, feedback from officers who are temporarily performing sergeant duties has informed

³¹ *Code of Practice on Disciplinary and Grievance Procedures*. Acas 2015. Available from www.acas.org.uk/media/pdf/f/m/Acas-Code-of-Practice-1-on-disciplinary-and-grievance-procedures.pdf. Also *Discipline and grievances at work: The Acas guide*, Acas, August 2017. Available from: www.acas.org.uk/media/pdf/9/g/Discipline-and-grievances-Acas-guide.pdf

³² The Equality Act 2010 defines the following characteristics as protected characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation. Available from: www.legislation.gov.uk/ukpga/2010/15/section/4

³³ We last examined these issues as part of our 2015 PEEL legitimacy inspection. See *Police legitimacy 2015 – a national overview*, HMIC, February 2016. Available from: www.justiceinspectorates.gov.uk/hmicfrs/publications/police-legitimacy-2015/

the development of a bespoke training programme to support their transition into the rank. This means that the workforce are more likely to feel involved in organisational change, which could improve the sustainability of any changes made.

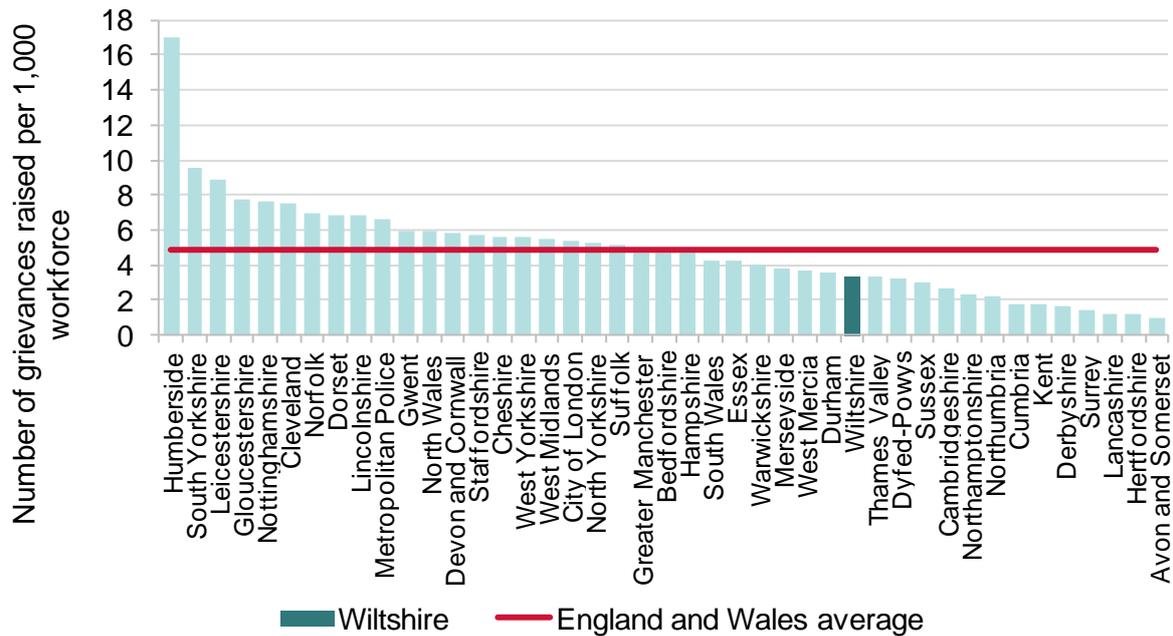
Identifying and resolving workforce concerns

Wiltshire Police is good at identifying and resolving workforce concerns. It frequently monitors a range of information and data to help recognise the issues that may affect workforce perceptions of fair and respectful treatment. The force has an established monthly review board to identify emerging trends in data or specific cases of concern. The board is chaired by a chief officer and reviews welfare information, complaints, misconduct cases and comprehensive sickness data.

Data on the numbers and types of concerns, problems or complaints (collectively known as grievances) that have been raised by officers or staff can provide forces with useful information about matters of concern to their workforces. All forces have grievance procedures but the number of grievances in each force differs widely across England and Wales. We requested data for the ten months from 1 April 2016 to 31 January 2017 on the number of grievances raised by the workforce. Figure 2 below shows that Wiltshire Police had 3.3 grievances raised per 1,000 workforce. This is broadly in line with the England and Wales average of 4.9 grievances raised per 1,000 workforce.

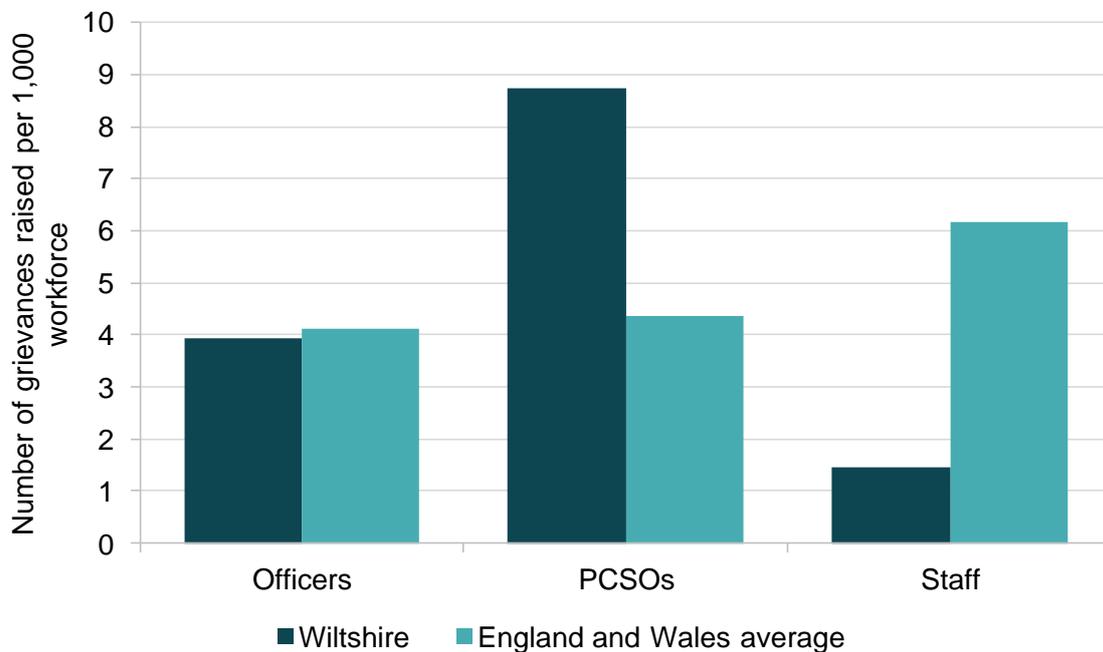
Figure 3 shows that the number of grievances raised by officers in Wiltshire Police was 3.9 grievances per 1,000 officers, and the England and Wales average of 4.1 grievances per 1,000 officers. In the same period PCSOs raised 8.7 grievances per 1,000 PCSOs, and the England and Wales average was 4.4 grievances per 1,000 PCSOs. Police staff raised 1.5 grievances per 1,000 staff in the same period; and the England and Wales average was 6.2 grievances per 1,000 staff.

Figure 2: Grievances raised per 1,000 workforce in Wiltshire Police in the ten months from 1 April 2016 to 31 January 2017



Source: HMICFRS Legitimacy data collection

Figure 3: Grievances raised by officers, PCSOs and staff (per 1,000 officers, PCSOs and staff) in Wiltshire Police in the ten months from 1 April 2016 to 31 January 2017



Source: HMICFRS Legitimacy data collection

Wiltshire Police has processes in place that promote the use of resolution and mediation to resolve concerns in a timely manner. A number of workforce mediators have been trained by an external company to provide support to staff involved in

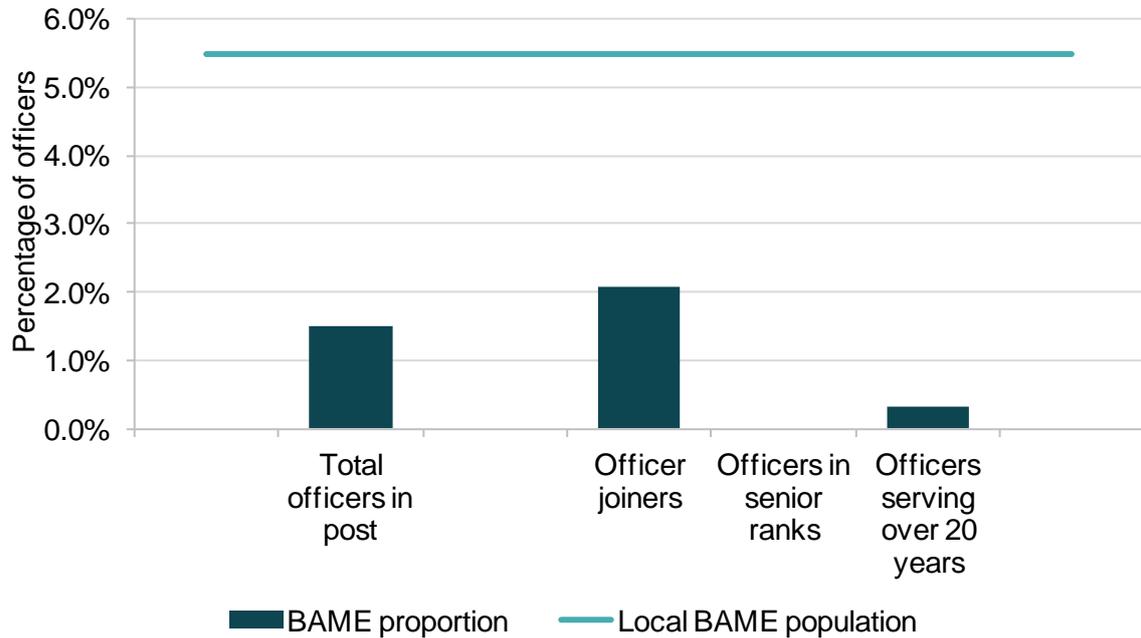
formal grievances. A mediator is an independent person who is invited into a conflict or dispute to work with the parties involved as they try to find a positive resolution to their situation. This is a new initiative for the force and it is due to start in August 2017. Although it was not in place at the time of our inspection, training had been given to workplace mediators and evaluation was planned. HMICFRS reviewed ten grievance cases and found that in all cases the force had properly identified, investigated and resolved the grievance in line with the Acas Code of Practice and guidance. We found that all grievance cases had a record of appropriate arrangements put in place to support the member of the workforce or witnesses throughout the process. The staff we spoke to felt encouraged and supported by leaders to raise workplace concerns and had trust and confidence in line managers to deal with informal grievances fairly.

Creating a more representative workforce

To assess how well the force reflects the local population, we considered data on the number of women and people from BAME communities recruited to the force, the number at senior officer level and the number who have served for over 20 years. We used these data to compare the make-up of the force with the make-up of the community it serves.

In the geographical areas served by Wiltshire Police, the 2011 census indicates that BAME people made up 5.5 percent of the local population. In 2016/17, in Wiltshire Police 1.5 percent of officers were BAME (see figure 4). In relation to officers, 2.1 percent of those joining the force, none of those in senior ranks and 0.3 percent of those who had served over 20 years were BAME.

Figure 4: Percentage of officer joiners, officers in post, officers in senior roles and officers serving over 20 years who are black, Asian or minority ethnic (BAME) in Wiltshire Police in 2016/17, compared with the percentage of BAME people in the local population

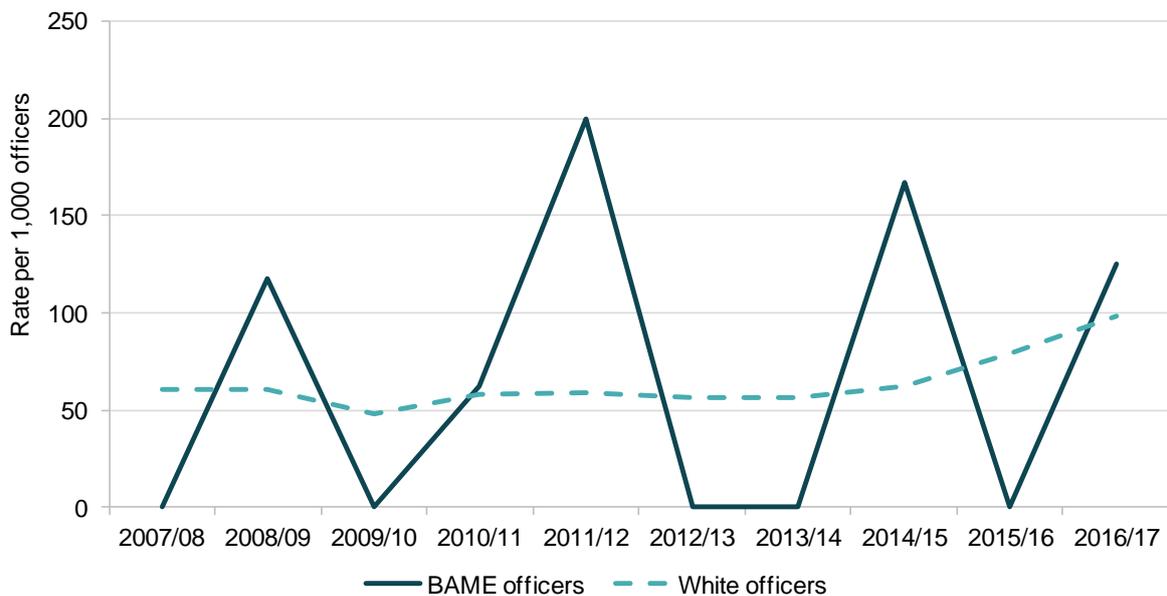


Source: Home Office Annual Data Requirement

Note: High percentages may be due to low overall numbers. The figure above represents officers where an ethnicity was stated.

In 2016/17 in Wiltshire Police for the equivalent of every 1,000 BAME officers, 125 left the force (see figure 5), while for every 1,000 white officers 98 left. Fluctuations in the BAME officer leaver rate may be due to low numbers of BAME officers in the force.

Figure 5: Comparison of officer leaving rates between white and black, Asian or minority ethnic (BAME) officers (per 1,000 white or BAME officers) in Wiltshire Police from 2007/08 to 2016/17

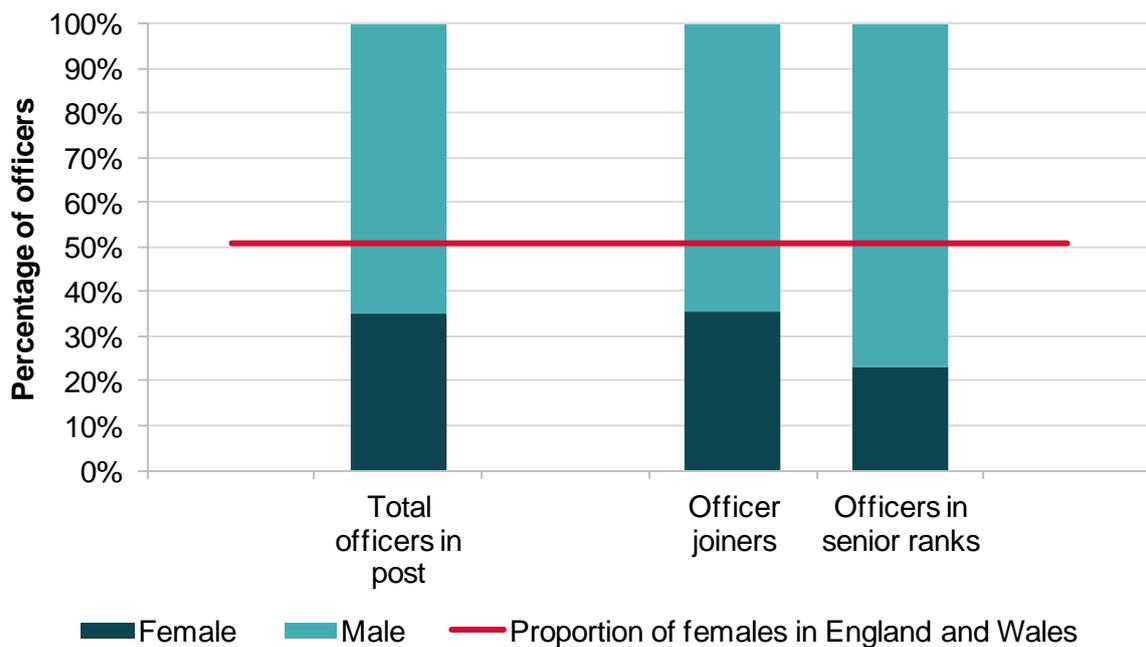


Source: Home Office Annual Data Requirement

The proportion of female officers, at 35 percent, is lower than the proportion of females in the general population (51 percent). In the 12 months to 31 March 2017 in Wiltshire Police, 35 percent of those joining the force and 23 percent of those in senior ranks were female (see figure 6).

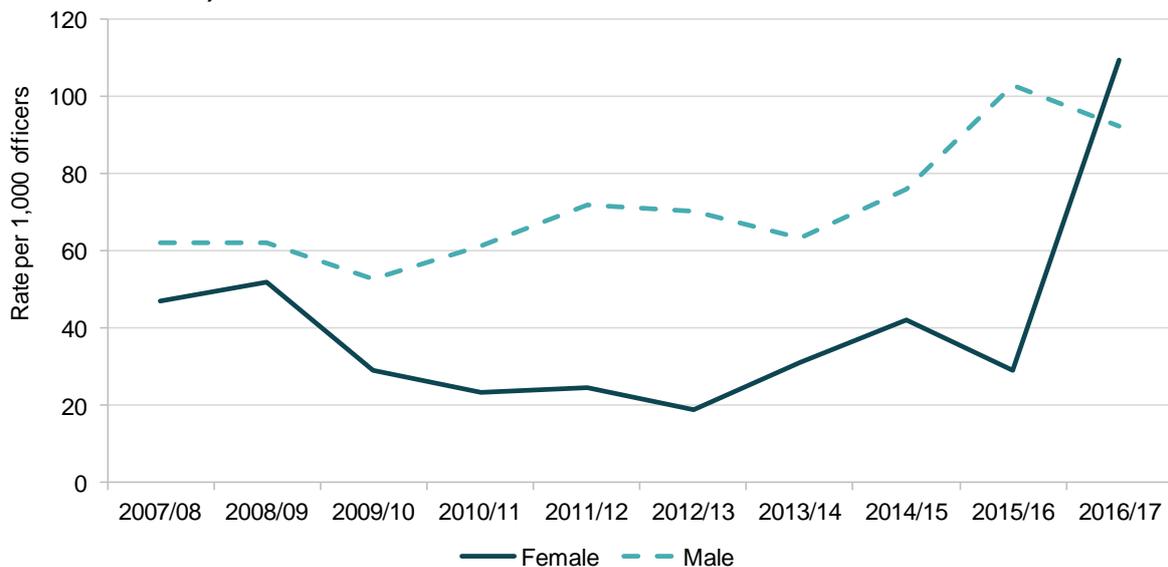
In 2016/17 in Wiltshire Police, 109 female officers per 1,000 officers left the force, compared with 92 male officers per 1,000 officers (see figure 7).

Figure 6: Percentage of officer joiners, officers in post and officers in senior ranks, by gender, in Wiltshire Police in 2016/17 compared with the percentage of women in the England and Wales population



Source: Home Office Annual Data Requirement

Figure 7: Comparison of officer leaving rates between male and female officers (per 1,000 male or female officers) in Wiltshire Police from 2007/08 to 2016/17



Source: Home Office Annual Data Requirement

Wiltshire Police demonstrates a strong commitment to addressing workforce disproportionality. The force has a people, culture and inclusion strategy and governance structures in place to monitor information and data to identify progress made against the strategy. Meeting regularly, the people intelligence board scrutinises data on recruitment, retention and progression of officers and staff, including those with protected characteristics.³⁴ The force continues to work with an external company providing scrutiny, advice and guidance to achieve a diverse workforce. We found many examples of the force proactively promoting inclusion and equality. For example, a second comprehensive review of flexible working patterns was commissioned because of concerns that initial findings were disadvantaging female staff or those with caring responsibilities.

In our 2016 inspection, we reported on the force's work with an external company to understand the diverse nature of its communities and to support the force in achieving a representative workforce. This work is continuing and has helped the force to target recruitment activity by introducing a positive action team, formed early in 2017. Working with the force diversity lead and chair of the Black Police Association (BPA), the positive action team is pursuing a number of initiatives to support the force's current recruitment campaign. These include recruitment workshops with BAME candidates and mentoring schemes to support the recruitment and development of BAME staff. The BPA give 'BAME Matters' inputs to all new joiners and transferees, divisional leadership teams, constables, police community support officers (PCSOs) and police staff. Details of all people interested in joining the force are collated through the positive action team and contact is maintained with them as relevant roles become available. We were informed that 14 BAME candidates had been recruited successfully into officer or staff roles in the force since January 2017. Diversity champions are being developed in each community policing team to provide local support to prospective recruits. This was a pilot at the time of our inspection. However, we were told that a PCSO had been recruited recently with the support of a community policing team diversity champion.

We found clear governance and processes to support the effective investigation of complaints and misconduct investigations and to support officers and staff who are the subject of complaints. Approximately every six months, the force reviews the list of open complaint and misconduct cases in an effort to identify any disparity between members of the workforce from different ethnic groups who could face misconduct procedures. To ensure fairness in the way members of the workforce are treated, it is important that forces monitor this information regularly.

³⁴ The Equality Act 2010 defines the following characteristics as protected characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation. Available from www.legislation.gov.uk/ukpga/2010/15/section/4

How well does the force support the wellbeing of its workforce?

Police forces need to understand the benefits of having a healthier workforce – a happy and healthy workforce is likely to be a more productive one, as a result of people taking fewer sick days and being more invested in what they do.³⁵ HMICFRS assessed how well force leaders understand and promote these benefits by developing a culture that fosters workforce wellbeing, and how well forces use data and information – including feedback from the workforce – to identify and understand their wellbeing. Also, we assessed how well forces use this information to take preventative and early action to support workforce wellbeing at both an individual and organisational level.

Understanding and promoting wellbeing

Workforce wellbeing is a priority for Wiltshire Police and is driven by the chief constable and leaders throughout the force. Members of the chief officer team are proactively promoting wellbeing by setting and sharing three personal goals to promote their own wellbeing with the workforce. We found many examples of leaders encouraging the wellbeing of their staff through one-to-one meetings and by encouraging staff to take refreshment breaks. We found wellbeing embedded throughout the leadership development programme for new and existing leaders. For example, educational packages, development days and training programmes are provided to support them in promoting good health and wellbeing. Officers and staff we spoke to felt wellbeing was prioritised by leaders and commented positively on the caring nature of the force.

Identifying and understanding workforce wellbeing needs

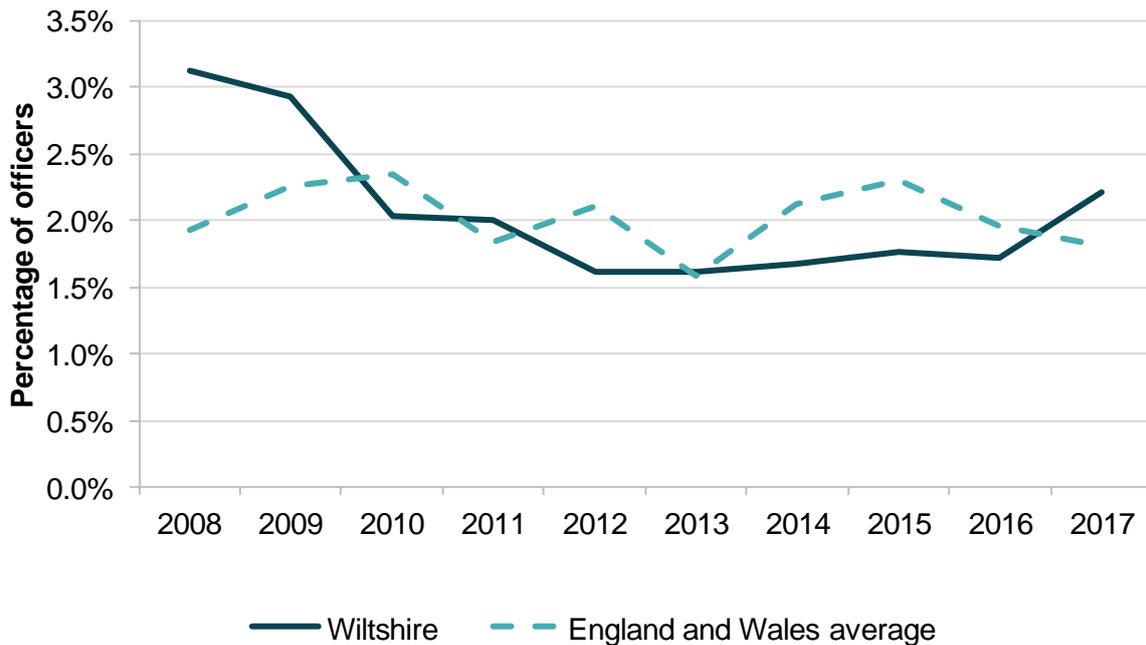
Wiltshire Police continues to have a good understanding of the risks and threats to the wellbeing of its workforce and their causes, and a focus on mental health and emotional wellbeing.

Analysis of sickness data can give an indication of whether there are problems relating to wellbeing within a police force. It provides a useful point of comparison between forces, which can also use sickness data to help them understand the nature and causes of sickness throughout the organisation to help them prevent and manage it when it occurs.

³⁵ *Well-being and engagement in policing: the key to unlocking discretionary effort*, Ian Hesketh, Cary Cooper and Jonathan Ivy, 2016, Policing. pp. 1–12. Available from: <https://oscarkilo.org.uk/wellbeing-and-engagement-in-policing-the-key-to-unlocking-discretionary-effort/> Also see <https://fitforwork.org/employer/benefits-of-a-healthy-workforce/>

We compared force data on the percentage of police officers, PCSOs and police staff on long-term and short medium-term sickness absence. On 31 March 2017 in Wiltshire Police, 2.2 percent of officers were on short or medium-term sick leave. The England and Wales average was 1.8 percent. The latest year for which data are available was 2017, which saw an increase of 0.5 percentage points from the previous year and a notably larger increase than in the previous ten-year period (see figure 8).

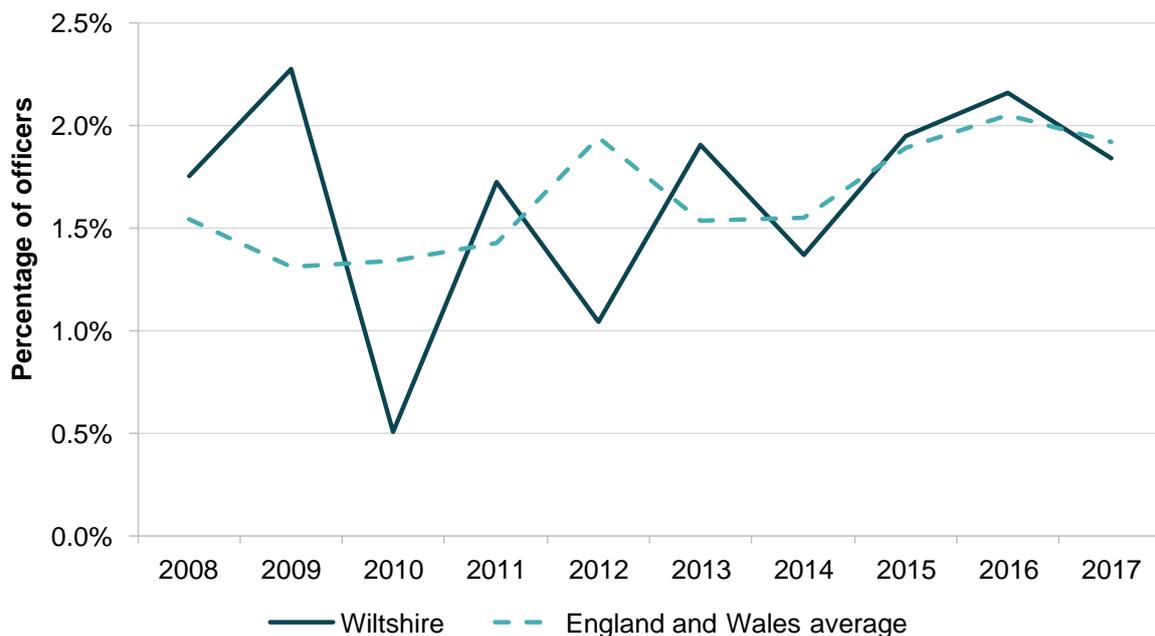
Figure 8: Percentage of officers on short or medium-term sick leave in Wiltshire Police compared with the England and Wales average, on 31 March from 2008 to 2017



Source: Home Office Annual Data Requirement

On 31 March 2017, the proportion of officers in Wiltshire Police on long-term sick leave was 1.8 percent and the England and Wales average was 1.9 percent (figure 9). The latest year for which data were available is 2017, which saw a decrease of 0.3 percentage points from the previous year and is in line with changes in the last ten-year period.

Figure 9: Percentage of officers on long-term sick leave in Wiltshire Police compared with the England and Wales average, on 31 March from 2008 to 2017



Source: Home Office Annual Data Requirement

The force analyses management information using a number of forums to identify and understand patterns and trends so it can put support for the workforce in place. For example, information on accidents at work, injuries sustained on duty, attendance, sickness rates and results from staff surveys are discussed during a regular health and wellbeing board meeting. This helps the force to understand the issues affecting wellbeing and enables early supportive measures to be put in place. The board is chaired by a chief officer and reviews welfare information, complaints, misconduct cases and comprehensive sickness data. For example, through a monthly review meeting it identified that a small number of staff were repeatedly being referred for welfare assessments after attending traumatic incidents. Further analysis identified staff shortages in that area of the force at that time. As a result, the force reviewed resourcing and provided additional welfare support at that location. Staff welfare is clearly a priority for the force, demonstrated through the chief constable’s staff engagement events, supportive leadership, peer support groups, annual staff surveys and comprehensive occupational health provision available for officers and staff. However, some officers and staff told us of ineffective resource management and its negative effect on workloads affecting the wellbeing of some teams.

The introduction of a wellbeing innovation log to record workforce suggestions on how wellbeing can be improved has involved over 150 members of the workforce and provided another source of information to assist the force in understanding the issues affecting the workforce. Cancer, mental health and menopause peer support groups are good examples of recent initiatives introduced into the force after a need identified from feedback through the wellbeing innovation log. However, officers and

staff told us that opportunities to take breaks for refreshments or to take time off are reduced in community policing teams and they often feel they operate at the boundaries of their wellbeing. We were informed that the force is aware of these issues, and a number of reviews and evaluations to make improvements were being undertaken at the time of our inspection.

Taking preventative and early action to improve workforce wellbeing

Wiltshire Police takes early action to improve the wellbeing of officers and staff. There is a range of effective preventative measures in place to improve workforce wellbeing, and supervisors are adequately equipped to recognise individual warning signs and to intervene early to prevent escalation. Chief officers have invested in the force occupational health unit and we found access to services was well managed. There are early interventions to prevent the escalation of work-related stress. For example, procedures are put in place after experiencing a traumatic incident, including referrals to counselling, and individuals receive an initial assessment within 48 hours. Supervisors have regular one-to-one meetings with officers and staff to review workloads and wellbeing and, when appropriate, action is taken to support individual welfare. In addition, there are regular wellbeing assessments, structured occupational health unit reviews and peer support schemes for members of the workforce who are investigating crimes of a sensitive nature.

The chief constable has introduced a new app which is available to the whole workforce on the force intranet. The app is called the 'Wellbeing Zone', and it provides advice on a number of topics that affect wellbeing including healthy eating, alcohol consumption, sleep, stress and financial management. Free water bottles have been provided in order to encourage the workforce to drink more water.

A manager's toolkit provides supervisors with advice and guidance on supporting workforce welfare and we found comprehensive leadership development regarding wellbeing. Being the subject of a public complaint or an internal misconduct allegation, or a witness to it, can be very stressful for members of the workforce and can affect their wellbeing. We reviewed 15 internal misconduct cases to see whether witnesses and those subject to the allegations received a satisfactory service from the force, from initial allegation through to final assessment. We found that a satisfactory service was provided in 13 cases. The recent introduction of information leaflets and the appointment of a welfare officer to support individuals who are the subject of a complaint have been received positively by the workforce.

How fairly and effectively does the force manage and develop both the performance of its individual officers and staff and its selection processes?

College of Policing research on organisational justice suggests that the process for promoting people and failure to deal with poor performance may have an adverse affect on workforce perceptions of fairness, and this in turn may lead to negative attitudes and types of behaviour in the workplace.³⁶ In addition, effective performance management and development mitigate risks to the force and ensure continuous improvement. HMICFRS assessed how fairly and effectively forces manage the performance of individual officers and staff, including the value that forces place on continuing professional development (CPD), in line with guidance from the College of Policing.³⁷ Also, we looked at how fairly forces identify and select their leaders, and the extent to which these decisions result in leaders who represent a range of styles, approaches and backgrounds.

Managing and developing individual performance

Wiltshire Police requires improvement in managing and reviewing the individual performance assessment process of its workforce (referred to as PDR). The force has an established performance assessment process called i-perform, which is also used as a method of assessing suitability for promotion. Individuals are assessed against force values, behaviours and role-related competencies. Members of the workforce have regular one-to-one meetings with line managers to review workloads, wellbeing and performance and those we spoke to felt these meetings were of value. The majority of people we spoke to lacked confidence in the effectiveness of i-perform and saw limited value from its completion. Furthermore, some officers and staff viewed the process as bureaucratic and some line manager assessments as inconsistent. The force is due to pilot a new performance review system later this year and this will be an area that we will revisit in future inspections.

The completion rate for i-perform at the time of our inspection was 78.4 percent and the force had governance arrangements to monitor compliance through human resource meetings. The force knows which members of the workforce are in the bottom 5 percent in terms of performance and there is effective scrutiny and

³⁶ *Fair cop 2: Organisational justice, behaviour and ethical policing*, College of Policing, 2015.

Available at:

http://whatworks.college.police.uk/Research/Documents/150317_Fair_cop%202_FINAL_REPORT.pdf.

³⁷ College of Policing guidance on the police performance development review (PDR) process is available from www.college.police.uk/What-we-do/Support/Reviewing-performance/Pages/PDR.aspx

See also the College of Policing's competency and values framework. Available from:

www.college.police.uk/What-we-do/Development/competency-and-values-framework/Pages/Competency-and-Values-framework.aspx

monitoring of these individuals through the monthly people intelligence board. We acknowledge that the force is taking action to make improvements through a new performance review system, but it should also consider how best to demonstrate the benefits that the new process can bring to the development of officers and staff.

Identifying potential senior leaders

Wiltshire Police is inclusive in its approach to leadership development and is good at identifying potential senior leaders. The force offers a broad range of leadership development pathways, all of which are open to officers and staff. Two core programmes aim to identify, nurture and develop potential senior leaders of the future. The senior leadership programme supports individuals in meeting the challenges of the superintendent and senior management ranks by providing access to development days, coaching, mentoring and structured workplace assessments. The developing leaders programme is a three-year programme which is used to identify promising officers and staff and to equip potential leaders with the skills to develop effectively. The programme is now in its second year and there were 30 delegates on the programme at the time of our inspection. The programme is available to all officers and staff through self-nomination, endorsed by line manager referral and a subsequent selection panel. Staff associations are involved in the selection process to ensure a fair and consistent approach.

We were encouraged to find that the officers and staff who are currently on the programme are evaluating it as they progress through it to identify what is working well and what could be improved. Involving participants in the future design of the programme is likely to ensure the scheme will meet the development needs of future participants as well as the leadership needs of the force. Some of the officers and staff we spoke to had a limited knowledge of the developing leaders programme, and this could create a barrier to people applying. The force should therefore assure itself that the whole workforce are aware of its leadership development opportunities.

Selecting leaders

Wiltshire Police excels in the development and selection of future leaders. Force promotion processes are professionally designed and focused on individual development determined by work-based assessments of the skills and competence of candidates. Individuals identified as potential senior leaders undertake a rigorous selection process, accessible through line manager endorsement, which is the gateway to a comprehensive leadership development programme. This comprises regular performance reviews, 360-degree feedback (feedback gathered from an individual's line manager, peers and their direct reports) and mentoring by a member of the senior command team. We found a range of leadership styles throughout the workforce and comprehensive use of 'colour profiling'. This is a development tool that increases an individual's self-awareness of their preferred leadership style; for example, a preference for detail, decisiveness or working collaboratively. We found multiple examples of colour profiling influencing leadership approaches and we were

impressed with its regular use throughout the workforce to support the effectiveness of daily activities. The promotion system is open and accessible to officers and staff. Representatives from staff associations and networks are involved in selection panels, and unsuccessful candidates are given structured developmental feedback to support their continuing development. Officers and staff we spoke to told us they trust and have confidence in these processes and perceive them as being fair.

Summary of findings



Good

The senior leaders in Wiltshire Police are committed to treating the workforce with fairness and respect, including demonstrating a strong commitment to addressing workforce disproportionality. The chief constable makes himself and his senior team directly available to the workforce and we found evidence that concerns raised are listened to and acted on. A good example of this is the extra developmental support put in place for newly promoted sergeants. The wellbeing of the workforce is prioritised; all chief officers have personal objectives to drive through improvements for frontline workers.

Organisational support for the workforce is also evident through a comprehensive programme of leadership training and development that has been established in the force. We found some examples of frontline officers and staff expressing anxieties about unreasonably high workloads. It would be advisable for the force to determine whether this is of more widespread concern among officers and staff.

Next steps

HMICFRS will assess progress on any recommendations and areas for improvement identified within its reports in a number of ways. We either re-visit those forces where we have identified a serious cause of concern, go back to assess them as part of our annual PEEL inspection programme or receive updates on their progress through regular conversations with forces.

HMICFRS highlights recurring themes emerging from our PEEL inspections of police forces within our national reports on police effectiveness, efficiency, legitimacy and leadership. These reports identify problems that are reflected across England and Wales and may contain additional recommendations directed at national policing organisations, including the Home Office, where we believe improvements need to be made at a national level.

Annex A – About the data

Data used in this report

The source of the data is presented with each figure in the report, and is set out in more detail in this annex. The source of Force in numbers data is also set out below.

Methodology

Please note the following for the methodology applied to the data.

Comparisons with England and Wales averages

For some datasets, the report states whether the force's value is 'lower', 'higher' or 'broadly in line with' the England and Wales average. This is calculated by using the difference from the mean average, as a proportion, for all forces. After standardising this distribution, forces that are more than 0.675 standard deviations from the mean average are determined to be above or below the average, with all other forces being broadly in line.

In practice this means that approximately a quarter of forces are lower, a quarter are higher, and the remaining half are in line with the England and Wales average for each measure. For this reason, the distance from the average required to make a force's value above or below the average is different for each measure so may not appear to be consistent.

The England and Wales averages will differ slightly from the Value for Money Profiles because we have included City of London Police and the Metropolitan Police Service within the average in this publication.

Statistical significance

When commenting on statistical differences, a significance level of 5 percent is used.

For some forces, numbers described in the text may be identical to the England and Wales average due to decimal place rounding, but the bars in the chart will appear different as they use the full unrounded value.

Population

For all uses of population as a denominator, unless otherwise noted, we use the Office for National Statistics (ONS) mid-2015 population estimates.

Note on workforce figures

All workforce figures are from the Home Office Annual Data Return (ADR) published in the Home Office's published police workforce England and Wales statistics (available from www.gov.uk/government/collections/police-workforce-england-and-wales), or the Home Office police workforce open data tables (available from www.gov.uk/government/statistics/police-workforce-open-data-tables).

This year we have tried to align our workforce categories with those in the Home Office workforce Statistics publication.

This means data presented on the gender and ethnic diversity of the workforce we have not included Section 38-designated officers within the 'Police Staff' category so that these figure will read across to the workforce publication more easily. However we have included Section 38-designated officers within descriptions of the total workforce to be consistent with HMICFRS Efficiency reports.

Please note that all workforce figures are in full-time equivalent (FTE) unless otherwise stated and exclude traffic wardens and special constables.

Force in numbers

Workforce (FTE) for 2016/17

Data may have been updated since the publication. Workforce includes Section 38-designated investigation, detention or escort officers, but does not include Section 39-designated detention or escort staff³⁸. The data are the actual full-time equivalent (FTE) and data for 2016/17 are as at 31 March 2017.

For FTE, these data include officers on career breaks and other types of long-term absence, and excludes those seconded to other forces.

Ethnic diversity and gender diversity

Data may have been updated since the publication. As noted above to align categories with Home Office publication the Police Staff category does not include Section 38-designated officers. Staff ethnicity data are derived from headcount rather than FTE.

Grievances

Data are derived from the HMICFRS data collection conducted prior to inspection. The data refer to those grievances that were raised and subject to a formal process (not including issues informally resolved with a line manager).

³⁸ See sections 38 and 39 of the Police Reform Act 2002. Available at: www.legislation.gov.uk/ukpga/2002/30/section/38

Stop and search

Data are derived from the Home Office Police Powers and Procedures England and Wales year ending 31 March 2016 publication (available at www.gov.uk/government/statistics/police-powers-and-procedures-england-and-wales-year-ending-31-march-2016). Stop and search totals used exclude vehicle only searches and those searches where the ethnicity of the subject was 'not stated'. The population data used is usual residents by ethnicity from the 2011 census.

Figures throughout the report

Figure 1: Likelihood of black, Asian and minority ethnic (BAME) people being stopped and searched (under section 1, PACE) compared with white people, in the local population of Wiltshire Police in the 12 months to 31 March 2016

Data are derived from the Home Office Police Powers and Procedures England and Wales year ending 31 March 2016 (available at www.gov.uk/government/statistics/police-powers-and-procedures-england-and-wales-year-ending-31-march-2016). Stop search totals used exclude vehicle only searches and those searches where the ethnicity of the subject was 'not stated'. Data may have been updated since publication. The likelihood of a stop and search is based on the number of stop searches per 1,000 population for each ethnic group. The population data used is usual residents by ethnicity from the 2011 census. These are the most robust and up-to-date population breakdowns by ethnicity.

Figure 2: Grievances raised per 1,000 workforce, in Wiltshire Police in the ten months from 1 April 2016 to 31 January 2017

Figure 3: Grievances raised by officers, PCSOs and staff (per 1,000 officers, PCSOs and staff), in Wiltshire Police in the ten months from 1 April 2016 to 31 January 2017

Data are derived from the HMICFRS data collection conducted prior to inspection. The data refer to those grievances that were raised and subject to a formal process (not including issues informally resolved with a line manager). Differences between forces in the number of raised grievances may be due to different handling and recording policies.

Figure 4: Percentage of officer joiners, officers in post, officers in senior roles and officers serving over 20 years who are black, Asian or minority ethnic (BAME), in Wiltshire Police in 2016/17, compared with the percentage of BAME people in the local population

These data are derived from ADR 511, 512 and 521. Data may have been updated since the publication. Officer ethnicity totals are based on numbers of people (referred to in the Home Office data as headcount) rather than FTE.

Figure 5: Comparison of officer leaving rates between white and black, Asian or minority ethnic (BAME) officers (per 1,000 white or BAME officers), in Wiltshire Police from 2007/08 to 2016/17

These data are derived from ADR 511 and 531. Data may have been updated since the publication. Officer ethnicity totals are headcount rather than FTE.

Figure 6: Percentage of officer joiners, officers in post and officers in senior ranks, by gender, in Wiltshire Police in 2016/17 compared with the percentage of women in the England and Wales population

These data are derived from ADR 502 and 521. Data may have been updated since the publication.

Figure 7: Comparison of officer leaving rates between male and female officers (per 1,000 male or female officers), in Wiltshire Police from 2007/08 to 2016/17

These data are derived from ADR 502 and 531. Data may have been updated since the publication.

Figure 8: Percentage of officers on short or medium-term sick leave, in Wiltshire Police compared with the England and Wales average, on 31 March from 2008 to 2017

Data used in the above data were obtained from Home Office annual data returns 501 and 552 and published in the Home Office police workforce open data tables (available from www.gov.uk/government/statistics/police-workforce-open-data-tables).

Figure 9: Percentage of officers on long-term sick leave, in Wiltshire Police compared with the England and Wales average, as at 31 March from 2008 to 2017

Data used in the above data were obtained from Home Office annual data returns 501 and 552. (available from www.gov.uk/government/statistics/police-workforce-open-data-tables). Long-term sick leave is defined as an absence due to sickness that has lasted for more than 28 days as at 31 March 2017. Data may have been updated since the publication.

Stop and search record review methodology

HMICFRS was commissioned by the Home Office to conduct a further assessment of reasonable grounds, building on the assessments we carried out in 2013 and 2015 so that we could demonstrate any changes over time. We used a similar methodology to do this: forces provided details of stop and search records by working back in time from 7 January 2017 until a total of 200 was reached.³⁹ This amounted to a total of 8,574 records – some records provided were not actually records of stop and search encounters, and these were excluded. As part of our assessment, we gave forces the opportunity to review our findings and make representations.

As in 2013 and 2015, HMICFRS reviewed each record to assess the reasonableness of the recorded grounds. However, this year we also identified how many of the records reviewed were carried out to search for drugs and whether stop and search was carried out for drugs, whether the suspicion involved possession only or the more serious supply-type offence. Currently forces are not required to differentiate between the two. We did this so that we could ascertain how many in our sample were for possession of drugs, rather than supply, as high rates of possession-only searches are unlikely to fit with force priorities.

This year, for the first time, we assessed whether or not the use of stop and search powers prevented an unnecessary arrest. We did this to ascertain how many of the records reviewed involved allaying the officer's suspicion in circumstances where the person would otherwise have been arrested, thereby representing a positive use of the powers. Allaying suspicion and preventing an unnecessary arrest is as valuable as confirming suspicion by finding the item searched for.

Professional standards case file review methodology

During February and March 2017, inspection teams from HMICFRS visited the individual or professional standards departments working collaboratively of each force to conduct a case file review. We asked forces to provide us with the last case files they had finalised up to 31 December 2016; but going back no further than two years. We asked to see:

- 10 complaints the force had recorded as containing an allegation of discrimination
- 15 complaints the force had recorded in categories we felt may contain unidentified allegations of discrimination

³⁹ City of London Police was unable to provide records up to 7 January 2017 but instead provided 200 records from 4 October 2016 to 26 November 2016.

- 10 service recovery complaints (if the force operated a separate service recovery scheme)
- 10 internal misconduct allegations the force had recorded as containing an allegation of discrimination
- 10 other internal misconduct allegations (so that we could ascertain if they contained unidentified allegations of discrimination)
- 10 grievances (and 10 workplace concerns if the force recorded these separately)

We assessed these case files against the relevant legislation, guidance and code of practice⁴⁰ to answer the following questions:

- Access to the system – Has the force identified those cases where the complainant requires additional support to make their complaint, and has that support been provided?
- Initial information – When the complaint was recorded, did the force provide the complainant with a copy of the complaint record, an explanation of the possible ways the complaint may be dealt with, and advised who will be dealing (including contact details)?
- Keeping complainants updated – Has the force provided complainants, witnesses, and those who are the subject of the complaints with regular, meaningful updates?
- Final outcome – Did the force provide the complainant with the findings of the report, its own determinations and the complainant’s right of appeal?
- Handling discrimination – Has the force failed to identify any allegations of discrimination? Have any discrimination cases that meet the IPCC mandatory referral criteria been so referred? Has the force investigated the complaints alleging discrimination satisfactorily? Overall, has the complainant making an allegation of discrimination received a good service from the force?
- Grievances/workplace concerns – Has the force identified, investigated and resolved the grievance satisfactorily? Has the force put arrangements in place to support the employees or witnesses throughout the process? Did the witness and those who are subject to the allegations receive a satisfactory service from the force?

⁴⁰ Relevant police complaints and misconduct legislation, IPCC statutory guidance, IPCC guidelines for handling allegations of discrimination, Acas code of practice on disciplinary and grievance procedures and Acas discipline and grievance guide.