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# PEEL: Police legitimacy 2016

An inspection of Bedfordshire Police



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## Introduction

As part of our annual inspections of police effectiveness, efficiency, legitimacy and leadership (PEEL), Her Majesty's Inspectorate of Constabulary (HMIC) assesses the legitimacy 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). It is therefore 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 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 those decisions), as well as being friendly and approachable.<sup>1</sup> This is often referred to as 'procedural justice'. Police actions that are perceived to be unfair or disrespectful can have extremely negative results for 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 themselves are being treated fairly and respectfully, particularly by their own police force. It is therefore important that the decisions made by their force about the things that affect them are perceived to be fair.<sup>2</sup> This principle is described as 'organisational justice', and HMIC considers that, alongside the principle of procedural justice, it makes up a vital aspect of any assessment of police legitimacy.

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<sup>1</sup> *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](http://whatworks.college.police.uk/Research/Documents/Fair_cop_Full_Report.pdf)

<sup>2</sup> *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](http://whatworks.college.police.uk/Research/Documents/150317_Fair_cop%20FINAL_REPORT.pdf)

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 tackle corruption. 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.

HMIC's legitimacy inspection assessed all of these areas during 2016. More information on how we inspect and grade forces as part of this wide-ranging inspection is available on the HMIC website ([www.justiceinspectorates.gov.uk/hmic/peel-assessments/how-we-inspect/](http://www.justiceinspectorates.gov.uk/hmic/peel-assessments/how-we-inspect/)). This report sets out our findings for Bedfordshire Police.

Reports on Bedfordshire Police's efficiency and leadership inspections are available on the HMIC website ([www.justiceinspectorates.gov.uk/hmic/peel-assessments/peel-2016/bedfordshire/](http://www.justiceinspectorates.gov.uk/hmic/peel-assessments/peel-2016/bedfordshire/)). Our reports on police effectiveness will be published in early 2017.

## Force in numbers



### Workforce

Total workforce as of 31 March 2016

**1,970**

Total workforce breakdown as of 31 March 2016

officers	staff	PCSOs
<b>1,083</b>	<b>854</b>	<b>33</b>



### Ethnic diversity

Percentage of BAME in workforce 31 March 2016

overall workforce

**6.2%**

officers	staff	PCSOs
<b>6.5%</b>	<b>5.5%</b>	<b>—</b>

Percentage of BAME in local population, 2011 Census

**22.5%**



### Gender diversity

Percentage of females in overall workforce 31 March 2016

**45%**

England and Wales population, 2011 Census

**51%**

Percentage of females by role 31 March 2016

**31%**

Bedfordshire Police

**62%**

PCSOs

**—**



## Public complaints

Number of public complaints per 1,000 workforce 12 months to 31 March 2016

	Bedfordshire Police	England and Wales force average
Officers	306	268
Staff (including PCSOs)	71	61



## Grievances

Number of grievances per 1,000 workforce raised and finalised 12 months to 31 March 2016

	Bedfordshire Police	England and Wales force average
Officers	14.8	4.8
Staff (including PCSOs)	3.4	6.8



## Victim satisfaction

Victim satisfaction with their overall treatment by the police 12 months to 31 March 2016

	Bedfordshire Police	England and Wales force average
Victim satisfaction with their overall treatment by the police 12 months to 31 March 2016	91.6%	93.4%

Due to the small number of PCSOs employed by Bedfordshire Police, the PCSO diversity figures are not available for this force.

For further information about the data in this graphic please see annex A

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

### Overall judgment<sup>3</sup>



**Good**

Bedfordshire Police has been assessed as good in respect of the legitimacy with which it keeps people safe and reduces crime. Our findings this year are consistent with last year's findings, in which we judged the force to be good in respect of the legitimacy.

The force treats the people it serves, and its workforce, with fairness and respect. It is good at seeking and responding to feedback and does good work on identifying and enforcing standards of behaviour. However, HMIC has concerns about the force's ability to ensure that its entire workforce behaves ethically and fairly because of limited capacity in its anti-corruption and vetting unit (ACU).

### Overall summary

Bedfordshire Police and its workforce have a good understanding of the importance of treating the people they serve with fairness and respect. The force uses a variety of methods to communicate and engage with the public, including those people who may have less trust and confidence in the police. It is good at seeking and acting on feedback to improve how it treats all the people it serves. For example, it involves the independent advisory group (IAG) in reviewing body-worn video camera footage of incidents where members of the public have been stopped and searched. The IAG also advises the force how to improve public perceptions of fairness and respectful treatment when planning policing events or responding to public concerns after high-profile public complaints.

Although the force is doing some good work on identifying and enforcing standards of behaviour, HMIC has concerns about the force's ability to ensure that its workforce behaves ethically and fairly. Its ability to identify, monitor and understand risks to the integrity of the organisation is limited by a lack of capacity in the ACU.

The force is in an alliance with Cambridgeshire and Hertfordshire Constabularies. The alliance's joint professional standards department (PSD), which includes the ACU, is implementing an improvement plan, drawn up after a serious gross misconduct court case collapsed over concerns about the quality of the investigation.

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<sup>3</sup> HMIC judgments are: outstanding, good, requires improvement and inadequate.



The plan affects all three forces in the alliance. The force and alliance need to ensure that there are enough staff with the capability, with additional support, both to implement the new PSD/ACU improvement plan successfully and to handle daily business effectively.

During our inspection we found that the force had implemented too few of the recommendations we made in our police integrity and corruption report in 2014,<sup>4</sup> which included recommendations for improving the capacity and capability of these units.

Officers and staff told us that they were aware of the seriousness of abuse of authority for sexual gain (taking advantage of a position of power to exploit vulnerable victims of crime) and some were aware of a recent case in Bedfordshire where an officer was dismissed for such conduct. However, the importance of identifying circumstances where officers and staff use their position for sexual gain has not been well communicated to officers. Officers and staff including supervisors are not clear about the early signs to look for.

The force has taken robust action when the behaviour of officers has fallen below the standard expected and has demonstrated to the public that it has responded positively, providing training to prevent further occurrences of a similar nature.

Bedfordshire Police is good at ensuring that it treats its workforce with fairness and respect. The force has an open culture and encourages feedback. It has an equalities group that is well attended by staff associations, unions and support networks and that is consulted on issues of fairness and respect. However, the force needs to improve how it manages individual performance and provides for the wellbeing of its workforce, particularly through preventative and early action. The force should ensure that its supervisors are sufficiently supported and trained to deal with management of sickness absence and other wellbeing responsibilities.

At the time of our inspection, the alliance was aiming to conduct an all-staff survey in June 2016, which should improve the force's understanding of how the workforce feels it is treated.

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<sup>4</sup> *Police integrity and corruption – Bedfordshire Police*, HMIC, 2014. Available at: [www.justiceinspectorates.gov.uk/hmic/publications/police-integrity-corruption-force/](http://www.justiceinspectorates.gov.uk/hmic/publications/police-integrity-corruption-force/)

### **Cause of concern**

The risks that HMIC identified in 2014 and the lack of progress of the recommendations, until recently following the collapse of a court case, is of serious concern.

### **Recommendations**

Bedfordshire Police, together with the other forces in the alliance, namely Hertfordshire Constabulary and Cambridgeshire Constabulary, should:

- review the capacity and capability of its PSD and ACU to ensure they can manage their work effectively;
- establish and operate effective processes for identifying and managing individuals at risk of corruption;
- ensure it complies with all aspects of the current national guidelines for vetting; and
- improve its workforce's understanding of all corruption prevention policies.

### **Areas for improvement**

- Annually, the force should produce a local counter-corruption strategic assessment and control strategy, to identify risks to the force's integrity.
- The force should improve the way it manages officers and staff who are on restricted and recuperative duties.
- The force should ensure that its supervisors can recognise and provide support with wellbeing issues.
- The force should improve how it manages individual performance.

## 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 them openly and clearly), while being consistently friendly and approachable.<sup>5</sup>

While HMIC recognises that police legitimacy stems from much broader experiences of the police than direct contact alone, our 2016 inspection focused specifically on public perceptions of fair treatment. Our inspection aims to assess how far the force can demonstrate the importance it places on maintaining procedural justice; and the extent to which it is seeking feedback to enable it to prioritise and act on those areas that have the greatest negative impact on public perceptions of fair and respectful treatment

(e.g. stop and search, surveillance powers or use of force). This should include how the force is approaching those groups that have the least trust and confidence in the police.

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

It is important for the police to understand that it is procedural justice – making fair decisions and treating people with respect – that drives police legitimacy in the eyes of the public, over and above police effectiveness at preventing and detecting crime.<sup>6</sup> HMIC assessed the extent to which the importance of procedural justice was reflected in the force’s vision and values, and the extent to which it was understood by the workforce.

### Organisational values

Bedfordshire Police has a good understanding of the importance of treating the people it serves with fairness and respect. This is part of its mission and values. We found the force’s mission statement and its values were displayed on the public website, force posters and on the intranet. There is also a well-established overarching aim to have a culture of openness and transparency. This is well understood by most of the workforce. The chief officer team have reinforced the values and Code of Ethics to supervisors through its ‘Leading the force together’

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<sup>5</sup> *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](http://whatworks.college.police.uk/Research/Documents/Fair_cop_Full_Report.pdf)

<sup>6</sup> *Ibid.*

leadership seminars and regular chief officer blogs. The officers and staff we spoke to understood why it is important to treat people with respect and fairness, and the impact on public confidence and satisfaction of their individual behaviour.

## **How well does the force seek feedback and identify those issues and areas that have the greatest impact on people's perceptions of fair and respectful treatment?**

HMIC's 2015 legitimacy inspection found a positive picture of how forces were engaging with communities. This year HMIC's assessment focused specifically on the extent to which forces are working to identify and understand the issues that have the greatest impact on people's perceptions of fair and respectful treatment, including how well they seek feedback and challenge from the people they serve.

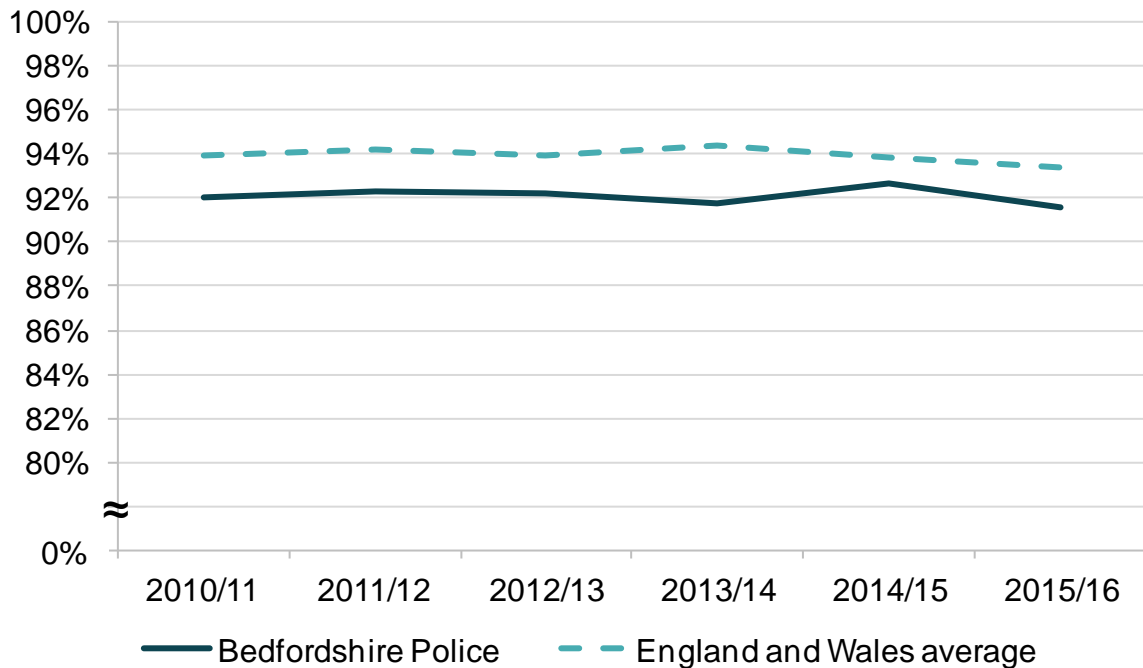
### **Seeking feedback and challenge**

Bedfordshire Police has a broad range of examples that demonstrate it is working hard to hear the opinions and experiences of people who are less likely to have trust and confidence in the police. The force is taking steps to develop closer links with harder-to-reach and vulnerable victims. It has established three new liaison posts to work with specific communities: the Gypsy, Roma and Traveller communities, universities and rural communities. This should enable the force to improve its understanding of how well these groups perceive that they are treated by the police. The force has listened to the rural community who felt that they were ignored by the police because there was not a visible police presence in their communities. Taking action to return officers to these areas is a positive response and should provide assurance.

All response officers have a 'care card' that they give out which contains a barcode that links to the force website. This allows victims to take part in a survey where they can provide information about their experience and how they were treated. These approaches achieve the dual benefit of letting the workforce know what it needs to do and of promoting a quality service to the public.

All forces are required to conduct victim satisfaction surveys with specified victims of crime groups and provide data on a quarterly basis. The surveys take account of victims' experience of the service provided to them by the police and inform forces' improvements to their service provision, including examining how well victims feel they are treated.

**Figure 1: Percentage of victims satisfied with overall treatment by Bedfordshire Police compared with England and Wales, from the 12 months to 31 March 2011 to the 12 months to 31 March 2016**



**Source: Home Office Annual Data Requirement**  
**For further information about the data in figure 1 please see annex A**

In the 12 months to 31 March 2016, 91.6 percent of all victims of crime (excluding hate crime) who responded to the victim satisfaction survey were satisfied with the overall treatment provided by Bedfordshire Police, which was lower than the England and Wales average of 93.4 percent; and lower than the 92.7 percent who were satisfied with the overall treatment that the force provided in the 12 months to 31 March 2015, this is not a statistically significant difference.

The IAG receives regular updates from the police on the community’s main concerns about the treatment of members of the community who have been detained by the police. If the force has made a mistake or committed serious misconduct then the lessons that have been learned are shared. This includes information about the action taken by the police. The IAG members have the opportunity to challenge these findings, including the information about how the public has perceived the actions of the police, from the media coverage of incidents. This has allowed the force to provide additional information in response to the public feedback and to consider how it will involve the public in a better way so it can scrutinise the actions of the force, such as through the stop and search scrutiny panel and the involvement of young people.

The force has commissioned a domestic abuse survey, designed to hear the voice of the victim. This is encouraging and will provide an opportunity to analyse how effectively services are provided and identify what can be done to improve how the police treat vulnerable victims. This is also being rolled out across Cambridgeshire and Hertfordshire.

The work the force is doing to ensure that those more likely to be stopped and searched are given the opportunity to scrutinise the way the force uses this power is very encouraging. The force involves young people in its stop and search scrutiny panel. It allows the young people to have an input on the legal requirements for stop and searches and to review the body-worn video footage of officers carrying them out. The feedback from the group is shared with the officer who conducted the search and emerging themes are shared across the force.

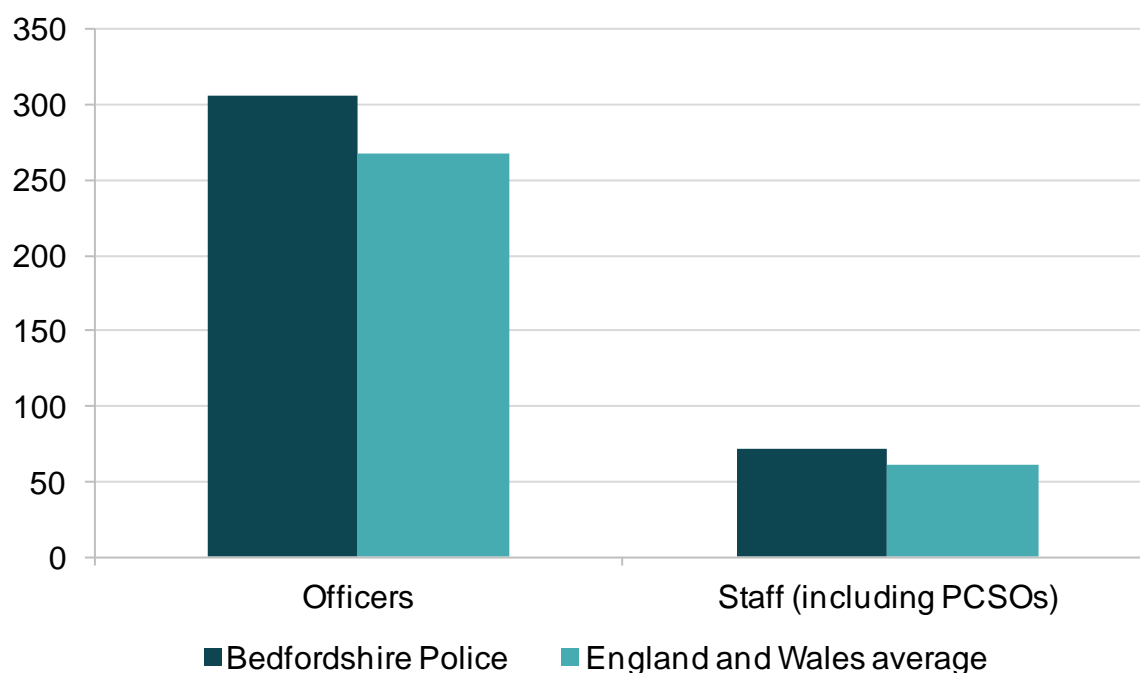
The force is improving its understanding of how effectively it listens to all communities and provides feedback on the action taken to address their concerns. It has a new community engagement strategy, which aims to increase the pace of progress over developing an understanding of how well the force is treating the public.

## **Identifying and understanding the issues**

Bedfordshire Police has a good understanding of the issues that have the greatest impact upon public perceptions of fair and respectful treatment. It has gained that through a number of means, including analysis of the outcome of prosecutions, public complaints, telephone surveys, and stop and search scrutiny group feedback. It has a good system of oversight and a robust governance structure. Information is considered by a variety of groups such as the equalities group. Data on public complaints is considered by the PSD governance group for the tri-force collaboration and further scrutiny and oversight is provided by the chief constable and the police and crime commissioner's scrutiny board.

Each force in England and Wales is required to record the nature of complaint cases and allegations and be able to produce complaints data annually. The numbers and types of complaints are valuable sources of information for forces and can be used to help them identify areas of dissatisfaction with their service provision, and to take steps to improve how they treat the public.

**Figure 2: Number of public complaint cases recorded against officers (per 1,000 officers) or staff (per 1,000 staff, including police community support officers) in Bedfordshire Police compared with England and Wales, in the 12 months to 31 March 2016**



**Source: HMIC Legitimacy data collection**

**For further information about the data in figure 2 please see annex A**

In the 12 months to 31 March 2016, Bedfordshire Police recorded 306 public complaint cases per 1,000 officers, which was broadly in line with the England and Wales average of 268 cases per 1,000 officers. During this period, the force recorded 71 public complaint cases per 1,000 staff (including PCSOs), which was broadly in line with the England and Wales average of 61 cases per 1,000 staff (including PCSOs).

The most recent Independent Police Complaints Commission (IPCC) data from forces show that, for April, May and June 2016, the type of complaint most frequently recorded by Bedfordshire Police is 'other neglect or failure in duty'.<sup>7</sup> It is important to note, however, an issue identified during our 2014 police integrity and corruption inspection;<sup>8</sup> complaint allegation categories used by different forces may overlap with each other. For instance, similar allegations might be recorded by one force as 'other neglect or failure in duty', and by another force as 'other irregularity in procedure' or 'lack of fairness and impartiality'. This means there is no definitive way of establishing accurately the number of public complaints about certain behaviours. For further information about the data in Figure 2, please see annex A.

<sup>7</sup> Independent Police Complaints Commission data is available at: [www.ipcc.gov.uk/reports/statistics/police-complaints/police-performance-data](http://www.ipcc.gov.uk/reports/statistics/police-complaints/police-performance-data)

<sup>8</sup> *Integrity matters*, HMIC, January 2015. Available from: [www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/](http://www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/)

## **How well does the force act on feedback and learning to improve the way it treats all the people it serves, and demonstrate that it is doing so?**

It is important that, as well as actively seeking feedback from the public, the force also responds to that feedback. HMIC assessed the extent to which this response includes changes to the way the force operates to reduce the likelihood of similar incidents occurring in future, as well as resolving individual incidents or concerns, and how well the force communicates to the public the effectiveness of this action.

### **Making improvements**

Bedfordshire Police is good at acting on feedback that it receives and demonstrates that it is learning to improve the way it treats all the people it serves. It uses a broad range of opportunities to capture, monitor and analyse information about police treatment of the public. It has good examples of briefing and training that it has provided to the workforce, including providing guidance to improve the safeguarding of detainees and improving the understanding of how autism may influence how a member of the public responds to the police. This improved understanding should help officers and staff consider how they respond to individuals to ensure they are treated fairly. Also, we found that the force communicated well with the media to explain to the wider public how it had dealt with officers who had acted improperly – for example, giving details of the discipline measures taken and the outcome, and what the force had done to make improvements and to prevent further occurrences.

A stop and search scrutiny group considers the use of coercive powers such as stop and search and also scrutinises use of body-worn video cameras. Analysis is provided to local police commanders so that they can address local performance issues and use any learning from the review of body-worn video footage. Hertfordshire Constabulary is responsible on behalf of the three alliance forces for the scrutiny of feedback from the independent custody visitors, who conduct unannounced visits to custody suites.

An operational review panel considers all recommendations from inspecting bodies and the IPCC. The group meets monthly to track recommendations, and named officers and staff responsible for ensuring progress are held to account. A 'lessons learned' bulletin is circulated across the alliance by e-mail and placed on the respective forces' intranets.

The operational review panel does not yet consider all sources of information from the community, partner organisations, police and crime commissioner and members of parliament and could find ways of doing this more consistently by collating this information in one place. The alliance has an opportunity to increase knowledge and learning through the work of its new learning and development unit, which works for all three forces.



## Demonstrating effectiveness

Bedfordshire Police recognises that the public expects greater police visibility across the force area. It has worked with the two other forces in the alliance to address this and invested in better use of new technology to enable a more agile way of working. This means that more officers on the front line can remain visible in local communities, rather than having to return to a police station to complete reports. While there is still much to do to make the most of this way of working, the force is keen to demonstrate to communities that it is developing a more effective way of working to meet public needs.

The force also uses a wide range of 'watch schemes', such as neighbourhood watch and countryside watch, and volunteers engage with local police teams to raise concerns about local problems and to feed back on police and partner initiatives. This mechanism has also been used to identify community concerns. For example, the deputy chief constable and police and crime commissioner held a community meeting in Leighton Buzzard to discuss local concerns and as a result increased the number of police officers in that area. This response has received very positive feedback from the community and provided reassurance to those living and working in the more remote areas of Bedfordshire.

## Summary of findings



**Good**

Bedfordshire Police has a good understanding of the importance of treating the people it serves with fairness and respect and this is conveyed to the workforce and understood. The force is able to demonstrate that it uses a variety of methods to communicate and engage with the public. There are some good examples of the force seeking feedback, particularly from those who may have less trust and confidence in the police. It carries out surveys of victims and independent custody visitors conduct unannounced visits to custody suites and speak to detainees. The force also holds regular public meetings with chief officer attendance as well as seeking challenge from those more likely to be stop searched through a scrutiny panel. It learns from incidents where the police get it wrong, such as the arrest of an autistic member of the public. Positively, the force ensured it communicated in an open and transparent way with the public and the workforce, providing training to prevent a similar occurrence happening again.

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

In 2014, HMIC inspected the extent to which the police were acting with integrity and guarding against corruption.<sup>9</sup> Given the continued importance of this topic, we are returning in this question to those national recommendations emerging from the 2014 report from that inspection that our 2015 legitimacy inspection did not cover. Our inspection focus this year also reflects research showing that prevention is better than cure: the best way to ensure that police workforces behave ethically is for the forces to develop an ethical culture and to have systems in place to identify potential risks to the integrity of the organisations, so that forces can intervene early to reduce the likelihood of corruption.<sup>10</sup>

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

One of the first things forces can do to develop an ethical culture is to use effective vetting procedures to recruit applicants who are more likely to have a high standard of ethical behaviour and to reject those who may have demonstrated questionable standards of behaviour in the past, or whose identities cannot be confirmed.<sup>11</sup>

Once recruited, one of the best ways to prevent corruption from occurring among the workforce is by establishing an ethical working environment or culture. To achieve this, forces need to clarify and continue to reinforce and exemplify acceptable and unacceptable standards of behaviour, including the Code of Ethics.<sup>12</sup> This year, HMIC focused on assessing progress in those areas highlighted for improvement in our 2015 legitimacy inspection and our 2014 integrity and corruption inspection.

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<sup>9</sup> *Integrity matters*, HMIC, January 2015. Available from: [www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/](http://www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/)

<sup>10</sup> *Promoting ethical behaviour and preventing wrongdoing in organisations*, College of Policing, 2015. Available at:

<sup>11</sup> *College of Policing: Authorised Professional Practice on vetting*. Available at: [www.app.college.police.uk/app-content/professional-standards/vetting/](http://www.app.college.police.uk/app-content/professional-standards/vetting/)

<sup>12</sup> *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](http://whatworks.college.police.uk/Research/Documents/150317_Integrity_REA_FINAL_REPORT.pdf) and *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](http://whatworks.college.police.uk/Research/Documents/150317_Ethical_leadership_FINAL_REPORT.pdf) and Literature review – Police integrity and corruption, HMIC, January 2015. Available at: [www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/](http://www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/)

## **Initial vetting**

The alliance has a vetting unit that provides all vetting services to the three forces. The head of the alliance PSD has oversight of the process, and the Cambridgeshire deputy chief constable is the senior responsible officer (SRO).

HMIC found that there are a number of areas for improvement in the way that the alliance's vetting unit undertakes vetting for the three alliance forces. The alliance's vetting policy and procedure are only partly based upon the national vetting policy. We were told that the alliance's approach to vetting the workforce, volunteers and contractors is based on common sense and risk management. The decision as to whom to vet and at what level is the responsibility of the alliance's vetting manager. This vetting manager also has the autonomy to prioritise vetting enquiries or extend clearance periods. All new joiners who have access to force buildings or computers are vetted. However, due to a lack of capacity within the alliance's vetting team, the alliance prioritises vetting and considers its approach is proportionate to the risks. For new recruits, the basic checks completed will include: local intelligence; police national computer; police national database (custody, crime records, child protection and domestic abuse); special branch checks; and, if the applicant has worked for a previous police force, checks with that force's PSD. In addition, checks on people who live at the same address and an open source search are conducted. The national guidance states that the force's databases should be searched. The alliance's unit cannot complete the required database checks because it lacks the capacity to do so. The guidance also states an applicant's family should be included for checking, but unless the applicant lives with the family, the unit does not do this either. The outcomes of the basic checks may lead to further checks being completed.

Bedfordshire Police is taking positive action to increase the representation of black, Asian and minority ethnic (BAME) police officers and staff in the workforce. The force considered how the current levels of vetting affected the ability of people to join the force. Having reviewed the decisions made by vetting, it was determined that the vetting was appropriate in all but a very small number of cases.

The alliance vetting unit has been reviewed to ensure that it has sufficient resources to address the current and future requirements. A recent decision has been made to double the size of the vetting unit. While this is encouraging, it needs to consider the short-term risks while the additional staff are recruited, trained and reach a level of operational competence. Early discussions are taking place for the vetting unit to work collaboratively with a further four forces. In the meantime, the SRO recognises the risks and is seeking support from other force vetting units to reduce the vetting backlog and increase capacity to deal with the additional vetting requirements from the recruitment.

The College of Policing's 'disapproved register' contains details of those officers who have been dismissed from the service or who either resigned or retired while subject to a gross misconduct investigation where it had been determined there would have been a case to answer. The force complies with its obligations to provide to the College of Policing with details of those officers and staff who have been dismissed from the service for inclusion on the current disapproved register.

### **Clarifying and reinforcing standards of behaviour**

Bedfordshire Police regularly clarifies and reinforces the standards of behaviour expected from its workforce. The chief officer team clearly describes the values and standards of behaviour expected and communicates this in a number of ways, such as in its leadership seminars.

The equalities and ethics group reviews information and data to understand how the force complies with its own values, which include the Code of Ethics.<sup>13</sup> The group has a bank of examples of different ethical dilemmas and it sets out the corporate responses to frequently asked questions, which are provided as a guide to officers and staff.

The force intranet contains clear messages on the force's mission and values, which also form part of the training for new and newly-promoted police officers and staff. We found that some officers and staff understand what is acceptable: for example, declaring a business interest and any notifiable associations. (A notifiable association is an association with an individual who could pose a risk to the integrity of an individual member of the workforce or the force itself. Officers and staff are required to report such associations, which then allows for a full evaluation of the risk posed to both the individual and the force.)

We found examples of PSD staff providing new officers with advice on how to improve the security of their social media accounts and what information should be made public. Officers and staff also view the alliance and force intranet systems to look at the outcomes of misconduct cases and many are aware of the seriousness of abusing their authority for sexual gain.

HMIC's 2014 police integrity and corruption inspection recommended that, within six months, the force should ensure that it has communicated to all staff the requirements to comply with policies relating to notifiable associations, secondary employment, business interests and gifts and hospitality. However, many of the officers and staff we spoke to were not aware of the requirements of these policies and we therefore consider that the force has not fulfilled this recommendation. It should continue its work to ensure that the workforce understands what is

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<sup>13</sup> 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, London, July 2014. Available at: [www.college.police.uk/What-we-do/Ethics/Documents/Code\\_of\\_Ethics.pdf](http://www.college.police.uk/What-we-do/Ethics/Documents/Code_of_Ethics.pdf)

acceptable in terms of receiving gifts and hospitality and declaring personal business interests and what ‘notifiable associations’ mean. Force policies on such matters are communicated via the intranet and this includes a regular PSD newsletter, known as ‘The Shield’.

Two whistleblowers had recently provided intelligence about notifiable associations. Disappointingly, there has been no action taken to follow up or to develop this intelligence.

The alliance of the three forces has initiated a programme to improve the work of the ACU and PSD. This work includes developing an improved communications strategy on anti-corruption and integrity.

## **How well does the force identify, understand and manage risks to the integrity of the organisation?**

HMIC’s 2014 police integrity and corruption inspection emphasised the need for forces to make arrangements for continuous monitoring of their ethical health, through active monitoring of force systems and processes to spot risks to their integrity, including – but not limited to – business interests, gifts and hospitality, and public complaints.<sup>14</sup> These findings reflect the research commissioned by the College of Policing, which highlights the importance of taking a problem-solving approach to preventing wrongdoing, by scanning and analysing police data to identify particular officers or hotspots for targeting prevention activity.

This year HMIC was particularly interested in how well forces – from dedicated anti-corruption units to individual supervisors – are identifying and intervening early to reduce individual and organisational vulnerabilities (i.e. those individuals, groups or locations that may be susceptible to corruption). We also assessed how well forces are seeking and assessing intelligence on potential corruption, with a focus on those areas for improvement identified in our previous inspections.

### **Identifying and understanding risks to integrity**

The equality, ethics and inclusion board, chaired by a chief officer, reviews information and data to understand how the force complies with its own values, including the *Code of Ethics*.<sup>15</sup> The PSD governance group continually monitors unacceptable behaviour identified from public complaints.

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<sup>14</sup> *Integrity matters*, HMIC, January 2015. Available from: [www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/](http://www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/)

<sup>15</sup> *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, London, July 2014. Available at: [www.college.police.uk/What-we-do/Ethics/Documents/Code\\_of\\_Ethics.pdf](http://www.college.police.uk/What-we-do/Ethics/Documents/Code_of_Ethics.pdf)

The alliance ACU is developing a new high-level plan to address HMIC's 2014 integrity and corruption inspection recommendations, and a departmental peer review is taking place after the collapse of a court case.

The vetting unit does not comply with the national police vetting policy.<sup>16</sup> The vetting unit is awaiting new national guidance on the different levels of vetting and the aftercare periods. It is clear from the vetting unit performance reports that the unit does not have sufficient capacity. This is also reflected in the low number of management vetting and enhanced management vetting clearances and counter-terrorist check clearances per 1,000 workforce conducted by the force. The vetting unit has a significant backlog of requested clearances for contractors and cadets. The priority is to vet new recruits; it does not have the capacity to re-vet existing officers and staff, which is a risk that Bedfordshire Police and the alliance recognise and are planning to improve with support from another force.

The vetting unit undertakes priority vetting for staff in more sensitive posts such as counter-terrorism and the eastern region serious organised crime unit, as well as specialist vetting for officers and staff, for example for those joining departments involved in child abuse investigations. However, not all officers and staff in sensitive roles are adequately vetted; for example, officers in confidential units whose vetting has expired. This is against the alliance's own policy.

The policing integrity and corruption inspection 2014 recommended that the force should develop within six months the capability to respond actively to information that identifies patterns of unprofessional behaviour and corruption. We found that Bedfordshire Police, and the alliance more widely, does not yet have this capability; the force and alliance do little to seek out risks to integrity across their area. The alliance needs to develop the monitoring of management information and force systems to identify risks, and this is a priority in its new action plan. HMIC is concerned that the reduction in the size of the ACU after reorganisation may not provide enough capacity to achieve the objectives set out in the new plan; the alliance needs to address the lack of capacity swiftly to reduce this risk.

### **Intervening early to manage risks to integrity**

It is important that police forces work proactively to enable them to identify unprofessional behaviour or people who may be at risk of committing misconduct, and intervene as quickly as possible, to manage risks to integrity. Bedfordshire Police and the alliance have limited capability to take early action to manage risks to integrity. They have plans to develop this capability through the implementation of a

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<sup>16</sup> ACPO / ACPOS National Vetting Policy for the Police Community, Association of Chief Police Officers, 2012. Available from: [www.northants.police.uk/files/documents/Freedom Of Information/ac^ACPO National Vetting Policy.pdf](http://www.northants.police.uk/files/documents/Freedom%20Of%20Information/ac^ACPO%20National%20Vetting%20Policy.pdf)

ACPO is now the National Police Chiefs' Council.

new ACU action plan. The force and alliance are developing their capability to identify staff or groups vulnerable to corruption, by, for example, profiling officers and staff who may face debt problems.

### **Looking for, reporting and assessing intelligence on potential corruption**

Bedfordshire Police, in conjunction with its alliance partners, is developing the way that it looks for, reports and assesses intelligence on potential corruption within the workforce.

We found officers and staff aware of the anonymous channel to report wrongdoing. A small number have used this method or have reported their concerns to a line manager who passed on the information to the PSD.

However, the force and alliance need to improve how well they assess all sources of intelligence on potential corruption once it has been received. HMIC's 2014 police integrity and corruption inspection recommended that the force and alliance, within six months, should ensure that they have a tasking and co-ordination process that considers, prioritises and records corruption-related intelligence. Since this recommendation was made, the PSD has introduced a tactical tasking and co-ordination group process, but this is a recent development. There is also a bi-weekly PSD and ACU meeting to ensure that all activity is recorded and appropriate oversight arranged. The meeting gives priority to developing intelligence according to the seriousness of the allegations, although there is no formal assessment of risk to prioritise activity. This work is being developed along with plans to introduce the 'management of risk in law enforcement'<sup>17</sup> (MORiLE) risk assessment, which will be used to assess and prioritise intelligence using a MORiLE threat score.

### **How well is the force tackling the problem of officers and staff abusing their authority for sexual gain?**

In 2012 the Independent Police Complaints Commission (IPCC) and Association of Chief Police Officers (ACPO) published *The abuse of police powers to perpetrate sexual violence*.<sup>18</sup> This report states that "the abuse of police powers for purposes of sexual exploitation, or even violence, is something that fundamentally betrays the trust that communities and individuals place in the police. It therefore has a serious impact on the public's confidence in individual officers and the service in general."

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<sup>17</sup> MORiLE – develops a range of methods that assist decision makers in identifying and prioritising threat, risk and harm, and links this to an organisational capacity and capability to respond.

<sup>18</sup> *The abuse of police powers to perpetrate sexual violence*, jointly published by IPCC and ACPO (now the National Police Chiefs' Council), September 2012. Available at: [www.ipcc.gov.uk/sites/default/files/Documents/research\\_stats/abuse\\_of\\_police\\_powers\\_to\\_perpetrate\\_sexual\\_violence.PDF](http://www.ipcc.gov.uk/sites/default/files/Documents/research_stats/abuse_of_police_powers_to_perpetrate_sexual_violence.PDF)



The report identified this behaviour as a form of serious corruption that forces should refer to the IPCC for its consideration of how it should be investigated.

The *Code of Ethics* – which sets out the standards of professional behaviour expected of all policing professionals – explicitly states that they must “not establish or pursue an improper sexual or emotional relationship with a person with whom [they] come into contact in the course of [their] work who may be vulnerable to an abuse of trust or power”.

The most recent national counter-corruption assessment, in 2013, highlighted corruption for the purposes of sexual gratification as a major threat to law enforcement.<sup>19</sup> HMIC’s 2015 report *Integrity matters*<sup>20</sup> identified police sexual misconduct as an area of great concern to the public. We share the public’s disquiet and so we looked at this issue specifically as part of our 2016 inspection. Our work was given additional emphasis in May 2016 by a request from the Home Secretary that we inspect forces’ responses to the issue of officers and staff developing inappropriate relationships with victims of domestic abuse and abusing their position of power to exploit victims.

### **Recognising abuse of authority for sexual gain as serious corruption**

The heads of the joint PSD and ACU recognise that they have not focused on actively gathering intelligence about staff who may abuse their authority for sexual gain. The ACU has introduced a new daily management process, which, although mainly reactive, will review the intelligence the ACU receives. The ACU will also review all public complaints against a sexual predatory behaviour matrix, following best practice from Kent Police.

The force’s anti-corruption strategy contains specific reference to abuse of authority for sexual gain. Officers and staff told us that they were aware of the seriousness of abuse of authority for sexual gain and some were aware of a recent case in Bedfordshire where an officer was dismissed for such conduct. However, HMIC found that the forces within the alliance need to communicate more effectively with their workforces about the kinds of behaviours that this type of misconduct can include, and how inappropriate and serious it is. While officers felt they would be able to identify inappropriate behaviour, this was not a reflection of what they had been told, but a personal view. It is important that the alliance ensures consistent understanding among officers and staff across the three forces about the

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<sup>19</sup> Every three years, the National Counter Corruption Advisory Group commissions a strategic assessment of the threat to law enforcement from corruption. The most recent assessment was completed in June 2013 by the Serious Organised Crime Agency. The assessment was based upon three years of intelligence reports on possible corruption gathered by forces in England and Wales, supplemented by information from other forces and national agencies.

<sup>20</sup> *Integrity matters*, HMIC, January 2015. Available from: [www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/](http://www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/)



seriousness of this type of behaviour. We found that the alliance's PSD and Bedfordshire Police ensure that these cases are always treated as mandatory referrals to the IPCC.

The head of the ACU provided an awareness briefing for senior leaders from all alliance forces in June 2016. This included detail of the anti-corruption strategy, with the principal aim of prevention and raising awareness. The presentation included important messages around prevention and internal integrity, with an overview of the main elements and signs of corrupt practice. It set out the current concerns and themes that surround sexual and predatory behaviour that is linked to vulnerable people, especially in relation to victims of domestic abuse. The presentation included ways to report any concerns about a colleague. The presentation was supported by academic research about police officer and staff responses to a range of ethical dilemmas. The ACU is also exploring how it can work with the Lucy Faithfull Foundation to review and learn from the charity's research into sexual offending by professionals from all walks of life.<sup>21</sup>

### **Looking for and receiving intelligence on potential abuse of authority for sexual gain**

The new head of the ACU has recognised that the alliance approach has not included a prevention plan to deter officers and staff who could abuse their authority for sexual gain. It has not focused on proactively gathering intelligence in relation to potential abusers either in Bedfordshire Police or across its partner organisations in the alliance. The heads of PSD and ACU for the alliance recognise this is a problem. There is a new ACU daily management process which, while it is predominantly reactive, will review the intelligence received by the ACU. Also, the ACU will review all public complaints against a sexual predatory behaviour matrix, using best practice from Kent Police.

### **Taking action to prevent abuse of authority for sexual gain**

The new head of the ACU has recognised that the joint PSD approach did not include a prevention plan. The unit intends to recruit an officer to lead and implement a prevention strategy, which will include the ACU taking responsibility for prevention work. Prevention activities are taking place across the alliance, including a chief officer-led group reviewing cases of officers abusing their position for sexual gain. The ACU will share the learning across the alliance.

The joint PSD and ACU inform new recruits and newly promoted officers about matters such as abuse of authority for sexual gain. Although the PSD's quarterly The Shield publication, available on the force intranet contains information on this issue. The importance of identifying circumstances where officers and staff use their

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<sup>21</sup> The Lucy Faithfull Foundation is a registered child protection charity which works across the UK to prevent child sexual abuse.

position for sexual gain has not been well communicated to officers. Officers and staff including supervisors are not clear about the early signs to look for. although we were told that a relationship with a 'victim' is strictly not allowed. A number of officers told us that they had recently seen a presentation following the dismissal of an officer who worked at their station.

### **Building public trust**

The alliance PSD has a communication plan which aims "to restore and rebuild public confidence to provide reassurance to previous, current and future victims to ensure that they are confident to report concerns/offences to the police".

The force is working to a comprehensive plan for continued communication with the workforce, other police and partner organisations and the public. There are various confidence-building activities planned for 2016, including the production of a joint message and video by the deputy chief constable in each of the alliance forces for internal broadcast and regular updates and bulletins in 'The Shield' and other force circulars. There will also be more information on the intranet and the force website regarding confidential reporting methods, regular meetings with staff representative associations, full reporting of misconduct and criminal trial outcomes and briefings to the OPCC.

The force promotes openness and transparency in relation to the conduct of its staff by undertaking media interviews in response to the findings of high profile misconduct or criminal cases involving its workforce. This includes interviews with senior members of the force and the media, and releasing footage that featured as evidence during the court trial.

## **How well does the force engage with the public and its workforce about the outcomes of misconduct and corruption cases?**

HMIC's 2014 literature review on police integrity and corruption emphasised the importance of collection and dissemination of information about misconduct to the public, on the basis that it shows police forces are taking the problem seriously, and detecting and punishing wrongdoing.<sup>22</sup> This information also forms the basis for deterring misconduct and enhancing integrity within police forces themselves. This year, HMIC looked at how well forces engage with the public online and through police officer misconduct hearings in public, and also more widely following high profile incidents with the potential to undermine public perceptions of police integrity. We also looked at how aware the workforce is of these outcomes.

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<sup>22</sup> *Literature review – Police integrity and corruption*, HMIC, January 2015. Available at: [www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/](http://www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/)

## Working with the public

The force website lists the outcomes from misconduct hearings. However, HMIC found this to be out-of-date and provided little information to the public. It includes information about gifts and hospitality which is updated annually, but the most recent information provided relates to 2013/14. This will need to be reviewed as part of the PSD action plan and the PSD is working with its communications team to address this.

The force works closely with the media on high profile cases. Independent advisory group (IAG) members sit on decision-making groups to provide independent advice for critical misconduct incidents and are part of the planning and response to these incidents. For example, following a death in custody, vigils were held by family and friends outside the police station. The group advised that there should not be a visible police presence, to allow mourners time to grieve, so the vigil was not policed. IAG members also attend public meetings to answer questions and support the police response.

## Working with the workforce

The PSD publishes regular updates on complaints and misconduct on the force's intranet. We found some officers and staff are aware of the key issues and how to find information on the details of the investigations. However, too few had seen the PSD's 'The Shield' publication, which contains good information on outcomes of misconduct and corruption cases. This includes the main themes and the consequences of not adhering to the standards expected. More needs to be done to ensure that the workforce knows about the action taken to address cases of misconduct and complaints.

We found some frontline supervisors who expressed concern about the dismissal of officers involved in high profile cases. This may be attributable to staff not knowing the full circumstances of the case; the force intends to address this through further briefings.

## Summary of findings



**Requires improvement**

We found that Bedfordshire Police and the alliance are doing some positive work on identifying and enforcing standards of behaviour through the PSD publications, leadership briefings, training for new recruits and specialist training on areas such as autism. However, HMIC has serious concerns that the force and its alliance partners are not yet in a position to ensure that the workforce behaves ethically and fairly.

We found too few of the recommendations we made in our police integrity and corruption inspection in 2014 had been implemented. For example, the force still does not have the capacity to vet the workforce adequately, and not all officers and staff we spoke to understood why they needed to declare business interests. We found that those recommendations that had been completed had only been completed recently and under the new leadership.

The PSD for the alliance, which includes the ACU and vetting unit, is currently the subject of an improvement plan, resulting from the collapse of a serious gross misconduct court case due to concerns about the quality of the investigation. The alliance response includes new heads of both the PSD and the ACU, who have brought with them experience, capability and the commitment to bring about improvements quickly. To implement improvements effectively, the force and alliance must ensure that these units have sufficient capacity, capability and support.

### **Cause of concern**

The risks that HMIC identified in 2014 and the lack of progress of the recommendations, until recently following the collapse of a court case, is of serious concern.

### **Recommendations**

Bedfordshire Police, together with the other forces in the alliance, namely Hertfordshire Constabulary and Cambridgeshire Constabulary, should:

- review the capacity and capability of its PSD and ACU to ensure they can manage their work effectively;
- establish and operate effective processes for identifying and managing individuals at risk of corruption;
- ensure it complies with all aspects of the current national guidelines for vetting; and
- improve its workforce's understanding of all corruption prevention policies.

### **Area for improvement**

- Annually, the force should produce a local counter-corruption strategic assessment and control strategy, to identify risks to the force's integrity.

## 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 behaviours.<sup>23</sup> As such, this concept of ‘organisational justice’ and its potential impact on ‘procedural justice’ forms an important part of HMIC’s assessment of police legitimacy. As there is no comparative data on how fairly officers and staff perceive forces to have treated them, we focused our assessment on how well forces identify these perceptions within their workforces and act on these findings. In particular, we looked at the extent to which organisational ‘fairness’ is reflected through the way individual performance is managed, and how ‘organisational respect’ is reflected through how forces provide for the wellbeing of their workforces, particularly through preventative and early action.

### How well does the force identify and act to improve the workforce’s perceptions of fair and respectful treatment?

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.<sup>24</sup> On this basis, HMIC assessed how well the force engages with its staff to identify and understand the issues that affect them, and how well it acts on these issues and demonstrates it has done so.

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<sup>23</sup> *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](http://whatworks.college.police.uk/Research/Documents/150317_Fair_cop%202_FINAL_REPORT.pdf)

*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](http://www.aipm.gov.au/wp-content/uploads/2013/08/Org-Justice-Final.pdf)

<sup>24</sup> *Fair cop 2: Organisational justice, behaviour and ethical policing*, College of Policing, 2015, page 11. Available at:

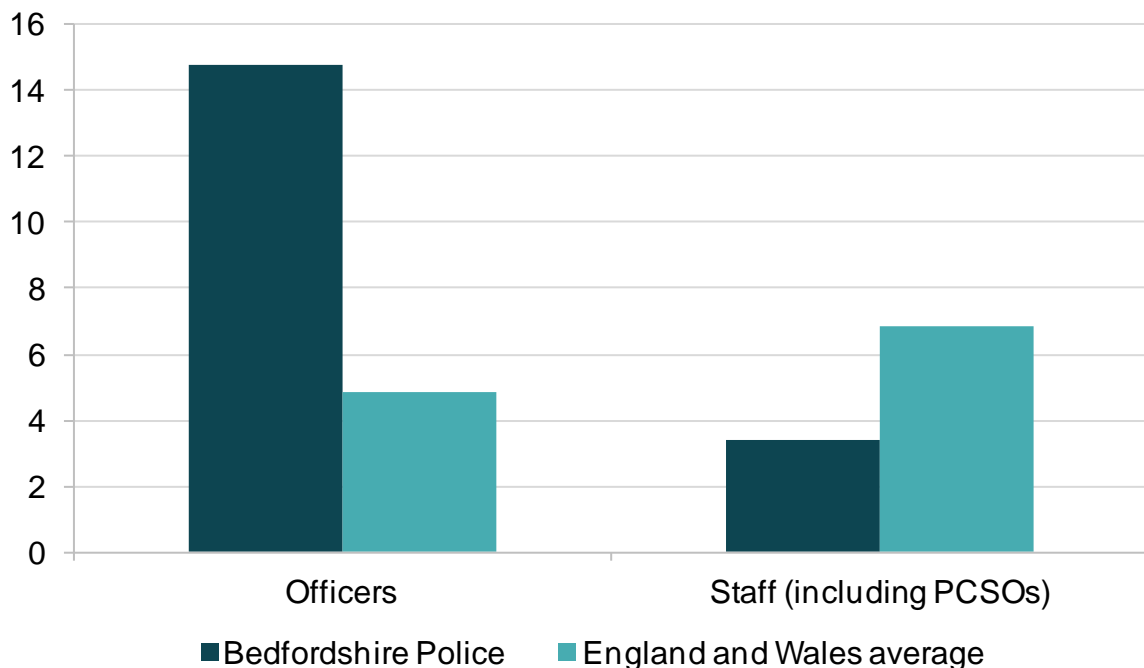
[http://whatworks.college.police.uk/Research/Documents/150317\\_Fair\\_cop%202\\_FINAL\\_REPORT.pdf](http://whatworks.college.police.uk/Research/Documents/150317_Fair_cop%202_FINAL_REPORT.pdf)

## Identifying and understanding the issues

Bedfordshire Police is committed to understanding the extent to which its workforce and volunteers perceive they are treated fairly and with respect, and which issues have the greatest impact upon them. The chief officer team is visible and regularly engages with the workforce to encourage feedback, using a broad range of ways to communicate. This includes the chief constable's seminars, blogs and e-mails to the chief officer team through which officers and staff can post questions to the chief officers or heads of departments. Chief officers have a positive relationship with staff associations and networks, and this has helped inform changes, such as the new 12-hour shift pattern for response officers, due to be implemented in September 2016, and the improved sergeants' course, developed following feedback from course attendees. The force has not conducted a formal survey of all staff since 2013 but it had plans in place with its partner forces in the alliance to conduct a survey of the three forces in June 2016, using the Durham University's national workforce climate and staff engagement survey. The survey will include feedback from the Special Constabulary.

Grievances are concerns, problems or complaints raised formally to employers by officers or staff. Data on numbers and types of grievances provide forces with a useful source of information about the sorts of issues that staff and officers are concerned about.

**Figure 3: Number of grievances raised by officers (per 1,000 officers) or staff (per 1,000 staff, including police community support officers) that Bedfordshire Police finalised compared with England and Wales, in the 12 months to 31 March 2016**



Source: HMIC Legitimacy data collection

For further information about the data in figure 3 please see annex A

In the 12 months to 31 March 2016, Bedfordshire Police finalised 14.8 formal grievances raised by officers per 1,000 officers, which was higher than the England and Wales average of 4.8 per 1,000 officers. During this period, the force finalised 3.4 formal grievances raised by staff per 1,000 staff (including PCSOs), which was broadly in line with the England and Wales average of 6.8 per 1,000 staff (including PCSOs).

The force recognises it has a high number of grievances against officers and has taken steps to address this in a timely manner.

The force has not evaluated the impact of the changes brought in as a result of collaborative working with the Cambridgeshire Constabulary and Hertfordshire Constabulary on the workforce. However, the collaboration team is developing an understanding of this. There is greater alignment across the three forces of human resources (HR) policies and shared practices, including on police staff discretionary leave, staff disciplinary policies, leave allocations and staff pay.

### **Making improvements and demonstrating effectiveness**

Bedfordshire Police takes effective action to improve fair and respectful treatment. The force has an equalities group which links into an equivalent group for the alliance. This group is well attended by staff associations, unions and support networks and is consulted on issues of fairness and respect for the force. The members are asked to suggest priorities and develop areas they have identified as important, for example developing coaching for officers and staff and allowing flexible working for those officers and staff who have caring responsibilities.

There has been progress on the alliance review and implementation of policies and processes. These include the postings and promotions policy, the attendance management process, flexible working and absence management. The aim is to ensure that officers and staff working in all three forces are treated with fairness and not disadvantaged as a result of the forces adhering to different policies and processes.

Further challenges for the force are agreeing joint terms and conditions for police staff and the development of a joint fitness test. It has consulted the workforce on its new organisational structure, including consultation with senior leadership teams and through these teams to inspectors and police staff grade equivalents. The consultation process demonstrates that the force listens to its workforce and it is treating it with fairness and respect.

A recent initiative, which started with a chief officer's question to an officer to find out more about what it is like to be black officer in Bedfordshire Police, has developed into a positive dialogue with other black officers. This discussion has identified the positive and negative experiences of being a black, Asian and minority ethnic

(BAME) member of the workforce. This information has been used to develop a buddy system for potential BAME recruits, recognising the need to support such recruits as they familiarise themselves with a new organisation.

## **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. Last year our inspection was concerned with what efforts forces were making to consider, and provide for, the wellbeing needs of their workforce. This year we looked at the progress the force had made since the last inspection, with a particular focus on preventative activity to encourage wellbeing.

### **Understanding and valuing the benefits**

Bedfordshire Police understands and values the benefits of workforce wellbeing, including psychological wellbeing. For example, a chief officer visits once a week for six weeks those officers and staff who have been suspended for extended periods pending the conclusion of misconduct investigations. This reflects a good understanding of the potential psychological effects for those individuals. Also, we heard about officers and staff who were given flexible time off work when a family member was seriously ill and receiving treatment.

A people plan is in place for the alliance which was agreed by all three forces in April 2016. It identifies five themes: wellbeing; developing leadership; resourcing (which includes workforce planning, diversity and skills gaps); enabling change (i.e., a cultural shift towards managers making decisions themselves with support from a self-service team); and harmonisation across the alliance of terms and conditions, pay and policies. The implementation of the people plan should ensure fairness of treatment across all three forces.

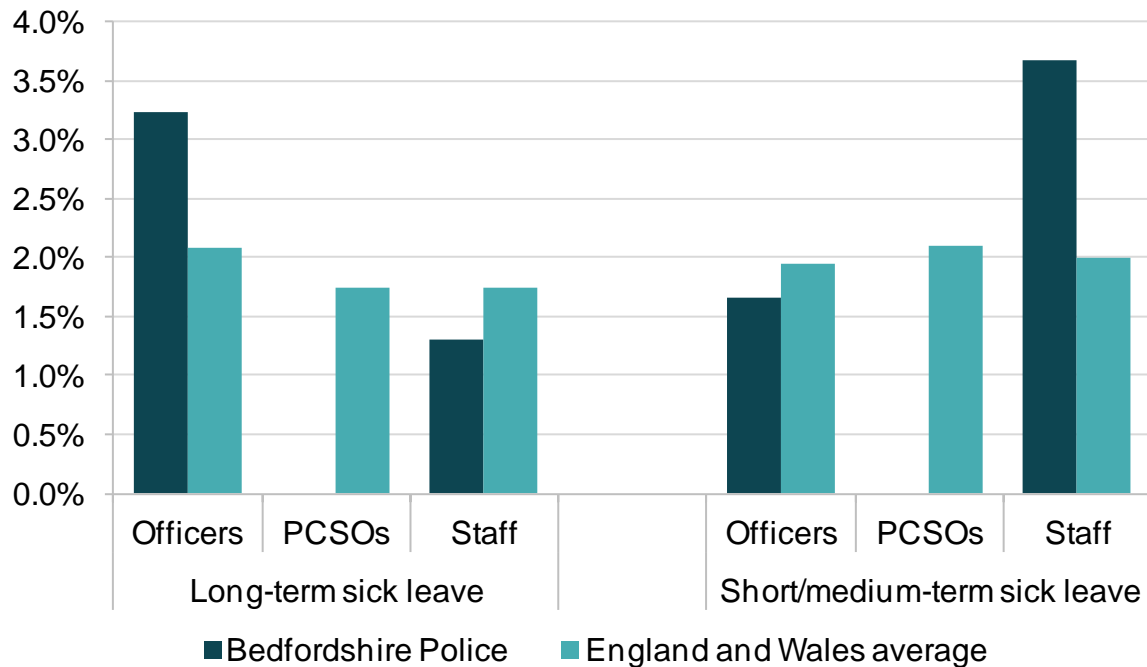
However, the force needs to provide its supervisors with better support to access services and training so that they understand their wellbeing responsibilities more fully. Officers and staff are concerned that occupational health support services are located outside the force area and worried about the telephone support provided. While there are plans in place to locate a new occupational health unit in Bedfordshire, some officers expressed reservations about the current provision, which may deter officers and staff from using the services.



## Identifying and understanding the workforce’s wellbeing needs

Sickness data can provide a useful point of comparison for assessing the wellbeing of police workforces. Analysis of this data can also help forces to identify and understand the nature and causes of sickness at individual and organisational levels, and inform targeted activity to prevent and manage sickness.

**Figure 4: Percentage of officers, police community support officers and staff on long-term and short/medium-term sick leave in Bedfordshire Police compared with England and Wales, as at 31 March 2016**



Source: Home Office Annual Data Requirement

Note: Long-term sickness is defined as an absence due to sickness that has lasted for more than 28 days as at 31 March 2016. For further information about the data in figure 4 please see annex A.

Figure 4 provides data on the proportion of officers, PCSOs and staff who were absent due to sickness on 31 March 2016.

- 3.2 percent of officers were on long-term sick leave, which is higher than the England and Wales average of 2.1 percent.
- 1.7 percent of officers were on short or medium-term sick leave, which is broadly in line with the England and Wales average of 2.0 percent.
- We have not provided the percentage of PCSOs in Bedfordshire Police on long-term or short or medium-term sick leave as at 31 March 2016 because the total number of PCSOs in the force was very low.
- 1.3 percent of staff were on long-term sick leave, which is broadly in line with the England and Wales average of 1.7 percent.

- 3.7 percent of staff were on short or medium-term sick leave, which is higher than the England and Wales average of 2.0 percent.

Bedfordshire Police is a small force with already-scarce resources; the impact of high numbers of officers and staff either off sick or on restricted duties is compounding capacity issues.

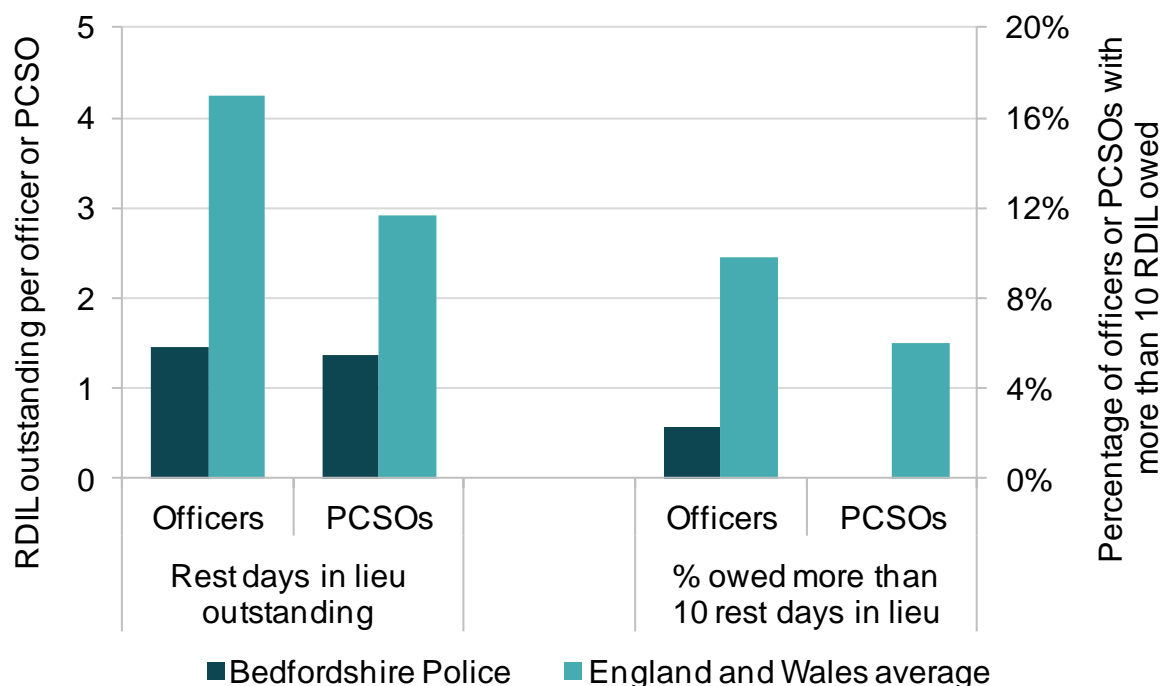
The force needs to do more to improve its management of officers and staff who are on restricted and recuperative duties. Getting staff fully fit and back to work is a principal aim of the chief constable and the police and crime commissioner. The force accepts it needs to use fully the management data and the tools that are available to support line managers to understand their role and work more closely with HR professionals. A chief officer has scrutinised the governance and management process, as well as individual cases. The force is improving its understanding of the causes and nature of illness and the options for treatment and return to work plans. It recognises the psychological impact upon officers who are away from the workforce for extended periods and also the impact upon a small force when officers and staff are absent. The frontline officers and staff we spoke to also wanted to see a more robust approach to sickness management, expressing some frustration with a small minority they considered were 'working the system'. The 2016 staff survey will focus on finding out workforce perceptions about their own wellbeing. This should provide a good basis for taking action in future.

The commandant and senior team in the special constabulary have quarterly team and monthly one-to-one meetings. Health and wellbeing are considered at these meetings. The inclusion of the special constables in the previous and recent all-staff survey was received positively.

Supervisors also commented that, while the force completes recruitment to resource the new policing model fully, staff shortages are putting some departments under pressure. They consider that this needs to be addressed more quickly to prevent officer and staff 'burn out'. This is reflected in some specialist department workloads. The situation is recognised by the force as a current risk and a priority.

Rest days in lieu (RDIL) are leave days owed to officers or police community support officers when they have been required to work on their scheduled rest day due to operational reasons. Long working hours can have a detrimental impact on the health and wellbeing of the workforce, so it serves as a useful point of comparison for assessing the extent to which the force is managing the wellbeing of its workforce. Analysis of the numbers of RDIL accrued, but not yet taken, can be useful tools for forces to identify and understand potential wellbeing concerns for individuals and teams.

**Figure 5: Number of rest days in lieu outstanding per officer or police community support officer (PCSO) and the percentage of officers or PCSOs with more than 10 rest days in lieu owed to them in Bedfordshire Police compared with England and Wales, as at 31 March 2016**



**Source: HMIC Legitimacy data collection**

**Note: For some police forces data about the number of rest days in lieu outstanding are estimated from data on hours owed. For further information about the data in figure 5 please see annex A.**

As at 31 March 2016, there were 1.5 rest days in lieu outstanding per officer in Bedfordshire Police, which was lower than the England and Wales average of 4.2 days per officer. On the same date, there were 1.4 rest days in lieu outstanding per PCSO in the force, which was broadly in line with the England and Wales average of 2.9 days per PCSO. As at 31 March 2016, 2.3 percent of officers in Bedfordshire Police had more than 10 rest days in lieu owed to them, which was lower than the England and Wales average of 9.8 percent. We have not provided the percentage of PCSOs in Bedfordshire Police with more than 10 rest days in lieu owed to them as at 31 March 2016 because the total number of PCSO's in the force was very low. The England and Wales average was 6.0 percent of PCSOs.

### **Taking preventative and early action to improve workforce wellbeing**

The alliance is about to open a new wellbeing suite in Sandy to improve access to services for Bedfordshire Police, Cambridgeshire Constabulary and Hertfordshire Constabulary. The alliance priority for the three forces is to develop better ways to prevent musculoskeletal and psychological absences. This includes working closely with the workforce to identify what works well.

The force is introducing a 'mindfulness' course: this initiative came about from an individual officer in public protection attending a course and feeding back into the organisation. There will be 30 staff on the pilot course. Mindfulness is seen as a tool to help identify early signs of stress and to provide effective support and suggestions for self help, such as improving exercise and diet, with the aim of preventing officers and staff requiring time off work due to ill health. Cambridgeshire Constabulary is leading on the work with the mental health charity 'Mind', as they have been able to get funding for two posts; Bedfordshire Police is trialling the mindfulness course, which will be reviewed and might then be implemented across the three forces.

## **How fairly and effectively does the force manage the individual performance of its officers and staff?**

College of Policing research on organisational justice suggests that lack of promotion opportunities and not dealing with poor performance may adversely affect workforce perceptions of fairness, which in turn may lead to negative attitudes and behaviours in the workplace.<sup>25</sup> HMIC assessed how fairly and effectively the force manages the individual performance of its officers and staff, including the extent to which the process aligns with guidance produced by the College of Policing.<sup>26</sup>

### **The performance assessment process**

The force started to reinvigorate its individual performance assessment process in April this year. It still needs to ensure that training and support are provided to supervisors and to make sure that the benefits of an effective assessment process is communicated effectively to the workforce. It is working hard to ensure that everyone has aims and objectives that reflect force priorities and reflect individual development needs. We found that more officers and staff have performance development reviews (PDRs) and more are engaged in regular one-to-one meetings with their line managers than during our last inspection. However, officers and staff told us that PDRs have little credibility and they could not see the benefits for themselves or the force. This is an area that needs to be improved, and the force should ensure not only that every member of staff has a PDR, but also that these are meaningful to ensure performance is effectively assessed and development opportunities are identified.

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<sup>25</sup> *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](http://whatworks.college.police.uk/Research/Documents/150317_Fair_cop%202_FINAL_REPORT.pdf)

<sup>26</sup> College of Policing guidance on the police performance development review process is available at: [www.college.police.uk/What-we-do/Support/Reviewing-performance/Pages/PDR.aspx](http://www.college.police.uk/What-we-do/Support/Reviewing-performance/Pages/PDR.aspx)

The alliance now has a shared policy and procedure reflecting recent recommendations from the College of Policing guidance.<sup>27</sup> This should ensure some level of consistency across the three forces, which is particularly important for those in the shared units that work across all three forces. The new alliance people plan reflects the guidance and requires all three forces to operate a robust PDR system. The planned new enterprise resource programme information technology system will include an electronic PDR form, which will enable consistency in the operation and monitoring of the process. There is an online PDR guide for supervisors. However, there is not yet a force-wide moderation process; such a process would help the force to ensure greater fairness in the use of PDRs for promotion and selection, as well as their use for continuous professional development.

### **The results of performance assessment**

The force recognises that it has more to do to ensure that all officers and staff have effective and fair annual PDRs and it has made progress in this area.

Although, it does not yet have a system that effectively records and tracks individual performance progression to encourage performance improvement and continuing professional development, we did find examples of the PDR being used for recent promotion and selection processes. It was also being used to identify areas for development, for which support and mentoring would be helpful. These included examples of the provision of mentoring to support areas for development where a candidate had not been successful in the promotion process.

## **Summary of findings**



**Good**

Bedfordshire Police has sought the views of its workforce in relation to perceptions of fair and respectful treatment but it could do more to tell officers and staff that it has taken action to address the issues raised. The new all-staff survey in June 2016 will provide helpful insight on the principal issues that need to be addressed.

Wellbeing is a priority for the force and it provides some good support to the workforce. There is a joint HR service across the three forces in the alliance, and more emphasis has been placed upon supervisors supporting their teams with less reliance on HR professionals. This work is starting to be part of day-to-day practice, but the force needs to ensure that there has been sufficient training so that signposting to sources of information for managers is clear and support is easier to access. To prevent and identify psychological ill health, the force is introducing a 'mindfulness' course, which will be a pilot scheme for the alliance.

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<sup>27</sup> *Ibid.*

The workforce performance assessment process has been reinvigorated recently. However, there is currently no formal oversight of the process, and the force cannot reassure itself that assessments are fair and effective. This means that more needs to be done to ensure that the workforce receives continuous professional development.

### **Areas for improvement**

- The force should improve the way it manages officers and staff who are on restricted and recuperative duties.
- The force should ensure that its supervisors can recognise and provide support with wellbeing issues.
- The force should improve how it manages individual performance.

## Next steps

HMIC assesses progress on causes of concern and areas for improvement identified within its reports in a number of ways. We receive updates through our regular conversations with forces, re-assess as part of our annual PEEL programme, and, in the most serious cases, revisit forces.

HMIC highlights recurring themes emerging from our PEEL inspections of police forces within our national reports on police effectiveness, efficiency, legitimacy and also leadership. These reports identify those issues 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 can be made at a national level.

Findings and judgments from this year's PEEL legitimacy inspection will be used to direct the design of the next cycle of PEEL legitimacy assessments. The specific areas for assessment are yet to be confirmed, based on further consultation, but we will continue to assess procedural and organisational justice aspects of police legitimacy to ensure our findings are comparable year on year.

## Annex A – About the data

Please note the following for the data presented throughout the report.

The source of the data is presented with each figure in the report, and is listed in more detail in this annex. For the source of force in numbers data, please see the relevant section below.

### Methodology

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

#### Comparisons with England and Wales average figures

For some data sets, the report states whether the force's value is 'lower', 'higher' or 'broadly in line with' the England and Wales average. To calculate this, the difference to the mean average, as a proportion, is calculated 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.

#### 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.

Where we have referred to the England and Wales average, this is the rate or proportion calculated from the England and Wales totals.

#### Population

For all uses of population as a denominator, unless otherwise noted, we use the ONS mid-2015 population estimates.



## Force in numbers

### Workforce figures (based on full-time equivalents) for 31 March 2016

These data are obtained from the Home Office annual data return 502. The data are available from the Home Office's published Police workforce England and Wales statistics, [www.gov.uk/government/collections/police-workforce-england-and-wales](http://www.gov.uk/government/collections/police-workforce-england-and-wales), or the Home Office police workforce open data tables, [www.gov.uk/government/statistics/police-workforce-open-data-tables](http://www.gov.uk/government/statistics/police-workforce-open-data-tables). Figures may have been updated since the publication.

Projections for March 2020 are budget-based projections and therefore are likely to take into account a vacancy rate depending on a force's planning strategy. In some instances an increase in budgeted posts may not actually indicate the force is planning to increase its workforce. In other cases, forces may be planning to reduce their workforce but have a current high vacancy rate which masks this change.

Police staff includes section 38 designated officers (investigation, detention and escort).

Data from the Office for National Statistics 2011 Census were used for the number and proportion of black, Asian and minority ethnic people within each force area. While the numbers may have since changed, more recent figures are based only on estimates from surveys or projections.

## Figures throughout the report

### Figure 1: Percentage of victims satisfied with overall treatment compared with England and Wales, from the 12 months to 31 March 2011 to the 12 months to 31 March 2016

Forces are required by the Home Office to conduct satisfaction surveys with specific victim groups. Victim satisfaction surveys are structured around core questions exploring satisfaction with police responses across four stages of interactions: initial contact, actions, follow up, treatment plus the whole experience. The data in figure 1 use the results to the question on treatment, which specifically asks "Are you satisfied, dissatisfied or neither, with the way you were treated by the police officer and staff who dealt with you?"

When comparing with the England and Wales average, the standard methodology described above has been used. When testing whether the change in percentage of respondents who were satisfied between the 12 months to 31 March 2015 and the 12 months to 31 March 2016 is statistically significant, a chi square hypothesis test for independence has been applied.

**Figure 2: Number of public complaint cases recorded against officers (per 1,000 officers) or staff (per 1,000 staff, including police community support officers) compared with England and Wales, in the 12 months to 31 March 2016**

The Independent Police Complaints Commission (IPCC) defines a complaint for the purposes of recording as “an expression of dissatisfaction by a member of the public with the service they have received from a police force. It may be about the conduct of one or more persons serving with the police and/or about the direction and control of a police force”. A police complaint can be about more than one officer or member of staff and can refer to one or more allegations.<sup>28</sup>

Data used in figure 2 are data extracted from the Centurion case recording and management system for Police Professional Standards data. We were able to collect the majority of this data through an automated database query, written for us by the creators of the software, Centurion (FIS Ltd). Forces ran this query on their systems and returned the outputs to us. This system is used in 41 of the 43 forces inspected. In order to collect the appropriate data from the two forces not using Centurion (Greater Manchester Police and Lancashire Constabulary), they were provided with a bespoke data collection template designed to correspond to information extracted from the Centurion database.

Although the IPCC categories used to record the type of public complaint and the accompanying guidance are the same in all police forces, differences in the way they are used still may occur. For example, one force may classify a case in one category while another force would classify the same case in a different category. This means that data on the types of public complaint should be treated with caution.

**Figure 3: Number of grievances raised by officers (per 1,000 officers) or staff (per 1,000 staff, including police community support officers) finalised compared with England and Wales, in the 12 months to 31 March 2016**

The data refer to those grievances that were subject to a formal process (not including issues informally resolved with a line manager). Some of the grievances finalised in this period may have been raised in a previous year. Finalised refers to grievances where a resolution has been reached, after any appeals have been completed. Differences between forces in the number of finalised grievances may be due to different handling and recording policies. Data used in figure 3 were provided to HMIC by individual forces via a bespoke data collection in April 2016 prior to inspection.

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<sup>28</sup> Guidance on the recording of complaints under the Police Reform Act 2002, Independent Police Complaints Commission. Available at: [www.ipcc.gov.uk/sites/default/files/Documents/statutoryguidance/guidance\\_on\\_recording\\_of\\_complaints\\_under\\_PRA\\_2002.pdf](http://www.ipcc.gov.uk/sites/default/files/Documents/statutoryguidance/guidance_on_recording_of_complaints_under_PRA_2002.pdf)

**Figure 4: Percentage of officers, police community support officers and staff on long-term and short/medium-term sick leave compared with England and Wales, as at 31 March 2016**

Long-term sickness is defined as an absence due to sickness that has lasted for more than 28 days as at 31 March 2016. Data used in figure 4 were obtained from Home Office annual data returns 501 and 551. Data on long-term absences can be found in the Home Office police workforce open data tables:

[www.gov.uk/government/statistics/police-workforce-open-data-tables](http://www.gov.uk/government/statistics/police-workforce-open-data-tables)

**Figure 5: Number of rest days in lieu outstanding per officer or police community support officer (PCSO) and the percentage of officers or PCSOs with more than 10 rest days in lieu owed to them compared with England and Wales, as at 31 March 2016**

Rest days in lieu are leave days owed to officers or police community support officers when they have been required to work on their scheduled rest day due to operational reasons. Data used in figure 5 were provided to HMIC by individual forces via a bespoke data collection in April 2016 prior to inspection.