

## **PEEL: Police legitimacy 2016**

### An inspection of Cambridgeshire Constabulary



December 2016

© HMIC 2016

ISBN: 978-1-78655-276-1

www.justiceinspectorates.gov.uk/hmic

### **Contents**

Introduction4				
Force in numbers6				
Overview – How legitimate is the force at keeping people safe and reducing crime?				
To what extent does the force treat all of the people it serves with fairness and respect?11				
To what extent does the force understand the importance of treating the people it serves with fairness and respect?11				
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?				
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?				
Summary of findings				
How well does the force ensure that its workforce behaves ethically and lawfully?20				
How well does the force develop and maintain an ethical culture?20				
How well does the force identify, understand and manage risks to the integrity of the organisation?				
How well is the force tackling the problem of officers and staff abusing their authority for sexual gain?25				
How well does the force engage with the public and its workforce about the outcomes of misconduct and corruption cases?				
Summary of findings				
To what extent does the force treat its workforce with fairness and respect?.31				
How well does the force identify and act to improve the workforce's perceptions of fair and respectful treatment?				
How well does the force support the wellbeing of its workforce?				

Α	Annex A – About the data	41	
Next steps		40	
	Summary of findings	39	
	How fairly and effectively does the force manage the individual perform officers and staff?		

### 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. 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. 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.

<sup>&</sup>lt;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

<sup>&</sup>lt;sup>2</sup> Fair cop 2: Organisational justice, behaviour and ethical policing, College of Policing, 2015.

Available at:
<a href="http://whatworks.college.police.uk/Research/Documents/150317\_Fair\_cop%202\_FINAL\_REPORT.pd">http://whatworks.college.police.uk/Research/Documents/150317\_Fair\_cop%202\_FINAL\_REPORT.pd</a>
f

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 (<a href="www.justiceinspectorates.gov.uk/hmic/peel-assessments/how-we-inspect/">www.justiceinspectorates.gov.uk/hmic/peel-assessments/how-we-inspect/</a>). This report sets out our findings for Cambridgeshire Constabulary.

Reports on Cambridgeshire Constabulary's efficiency and leadership inspections are available on the HMIC website (<a href="www.justiceinspectorates.gov.uk/hmic/peel-assessments/peel-2016/cambridgeshire/">www.justiceinspectorates.gov.uk/hmic/peel-assessments/peel-2016/cambridgeshire/</a>). Our reports on police effectiveness will be published in early 2017.

### Force in numbers



### Workforce

Total workforce as of 31 March 2016

2,249

Total workforce breakdown as of 31 March 2016

1,349

officers

765

staff

135

**PCSOs** 



### Ethnic diversity

Percentage of BAME in workforce 31 March 2016

overall workforce
3.0%

officers 2.4%

staff **3.0%** 

PCSOs **8.6%** 

Percentage of BAME in local population, 2011 Census

9.7%



### Gender diversity

Percentage of females in overall workforce 31 March 2016

Cambridgeshire Constabulary

29%

England and Wales population, 2011 Census

51%

Percentage of females by role 31 March 2016

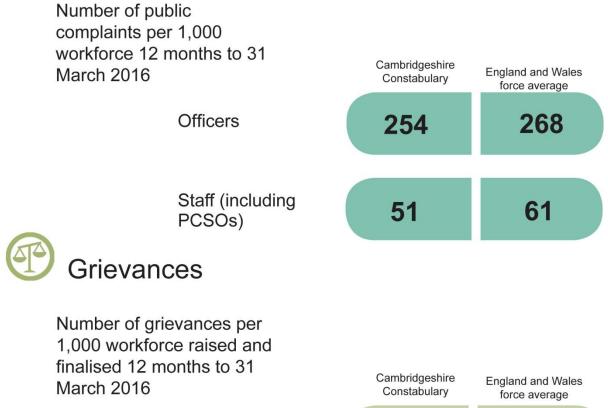
Cambridgeshire Constabulary officers staff PC

60%

51%

**PCSOs** 





Of	ficers	5.2	4.8
Sta PC	aff (including CSOs)	3.3	6.8



# Victim satisfaction

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

Cambridgeshire **England and Wales** Constabulary force average 94.8% 93.4%

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

Cambridgeshire Constabulary 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 seeks and acts on feedback to improve the services it provides and listens to the views of its workforce. It 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**

Cambridgeshire Constabulary and its workforce have a good understanding of the importance of treating the people they serve with fairness and respect. The force has a new communications strategy and also records and analyses information about police treatment of the public, so that it can act on feedback and learning to improve how it treats all the people it serves. The force could improve its identification and understanding of the issues that have the greatest effect on public perceptions of fair and respectful treatment and to address this it is developing its independent advisory group.

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 Bedfordshire Police and Hertfordshire Constabulary. 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. The plan affects all three forces in the alliance. The force and alliance need to

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

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.

The force needs to communicate effectively to the whole workforce how serious an offence it is for officers and staff to abuse their position for sexual gain (taking advantage of their position of power to exploit vulnerable victims of crime). The alliance realises that a proactive approach to gathering intelligence is needed and it is planning to introduce a prevention strategy.

Cambridgeshire Constabulary treats its workforce with fairness and respect. It has an open culture in which the workforce can express their views. The force listens to feedback and consults staff associations and networks to understand the workforce's needs. It manages individual performance well and supports workforce wellbeing, particularly through its preventative and early action in response to wellbeing concerns. The force needs to ensure that its acting and temporary ranks receive the training and support they need to deal with sickness management effectively. 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.

#### 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

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

- review the capacity and capability of its professional standards department and anti-corruption unit 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**

- The force should improve how it identifies and understands the issues that have the greatest impact on public perceptions of fair and respectful treatment.
- 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 how it clarifies and reinforces standards of behaviour, in particular when dealing with vulnerable people, including victims of domestic abuse.
- The force should ensure that its supervisors can recognise and provide support with wellbeing issues.

# 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. 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 it was understood by the workforce.

#### **Organisational values**

Cambridgeshire Constabulary has a good understanding of the importance of treating the people it serves with fairness and respect. This is embedded in their mission and values. We found evidence of the mission and values on the public website, force posters and the intranet. The force has a well-established overall aim of 'Doing the right thing' that most of the workforce understands well. The chief officer team has provided a strong message on the force's values and the *Code of* 

<sup>&</sup>lt;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

<sup>&</sup>lt;sup>6</sup> Ibid.

Ethics<sup>7</sup> to all first-line managers and supervisors through the leadership seminars. Officers and staff we spoke with have a good understanding of why it is important to treat people with respect and fairness, and understand the impact on public confidence and satisfaction their individual behaviour can have.

# 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.

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 Cambridgeshire Constabulary is 'other neglect or failure in duty'. It is important to note, however, an issue identified during our 2014 police integrity and corruption inspection, which is that 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.

#### Seeking feedback and challenge

Cambridgeshire Constabulary has a good corporate communications strategy, designed to help it build confidence and trust across its workforce, partner agencies and people who live and work in Cambridgeshire, providing innovative two-way communication with communities. To ensure that those individuals in the community who may have less trust in the police have a voice, the force has a scrutiny group that reviews the use of stop and search powers and examines body-worn video camera footage to provide feedback for improvements. As a result of this feedback, the force has focused on 'unconscious bias' and how it may affect the decisions

<sup>&</sup>lt;sup>7</sup> The Code of Ethics sets and defines the exemplary standards of behaviour for everyone who works in policing. *Code of Ethics*, College of Policing, 2015. Available from: <a href="https://www.college.police.uk/What-wedo/Ethics/Pages/Code-of-Ethics.aspx">www.college.police.uk/What-wedo/Ethics/Pages/Code-of-Ethics.aspx</a>

<sup>&</sup>lt;sup>8</sup> IPCC data are available at: <a href="https://www.ipcc.gov.uk/reports/statistics/police-complaints/police-performance-data">www.ipcc.gov.uk/reports/statistics/police-complaints/police-performance-data</a>

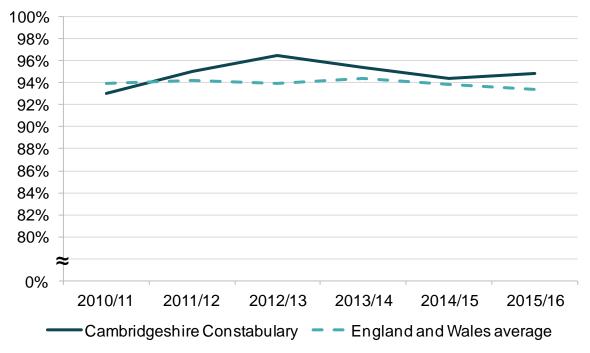
<sup>&</sup>lt;sup>9</sup> *Integrity matters*, HMIC, January 2015. Available from: www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/

officers make. However, the force needs to ensure it has a clear understanding of communities across Cambridgeshire so that it can allocate resources to communicate with them more effectively.

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.

Victim satisfaction rates are good, with 94.8 percent satisfied with their overall treatment in the 12 months to 31 March 2016, which was higher than the England and Wales average of 93.4 percent. The force has identified that 'follow-up' to inform victims about how their incident or crime investigation has progressed needs to be improved. In the 12 months to 31 March 2016, 76.3 percent of victims received follow-up information, which, while higher than the average for England and Wales of 74.4 percent, represents a drop in performance compared with the 12 months to 31 March 2012, when the figure stood at 82.2 percent. The Victims Hub, funded by the police and crime commissioner, is expanding to include all victims of crime and to supply 'follow-up' updates. This should provide reassurance to the community and increase public satisfaction.

Figure 1: Percentage of victims satisfied with overall treatment by Cambridgeshire Constabulary 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, 94.8 percent of all victims of crime (excluding hate crime) who responded to the victim satisfaction survey were satisfied with the overall treatment provided by Cambridgeshire Constabulary, which was higher than the England and Wales average of 93.4 percent; and higher than the 94.4 percent who were satisfied with the overall treatment that the constabulary provided in the 12 months to 31 March 2015. This is not a statistically significant difference.

The force uses a range of methods to seek feedback and challenge from the communities it serves, including victim satisfaction surveys, Skype, social media and face-to-face community meetings. We saw evidence of the force seeking feedback from the public at every level. This ranged from the chief constable addressing a rural community meeting, to frontline police and multi-agency officers and staff conducting door-to-door surveys in high crime areas, and outreach to minority groups by local neighbourhood teams. The force also has a 'Contact Us' portal on its website which encourages the public to tell the force about treatment problems.

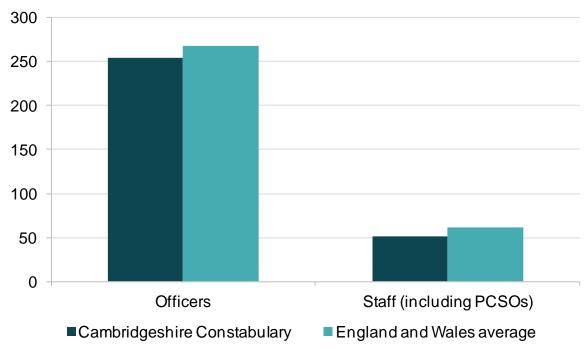
While the force recognises the benefits of using IT, it also understands that not everyone has access to it or is capable of using it, and the force has listened to local communities to understand how they want to feed back information. The community in Peterborough was concerned Skype might be replacing all other means of communication, so the force quickly revised the messages to explain that Skype is in addition to other communication channels. We were pleased to find that officers and staff understand that vulnerable victims may need more time to explain what has happened to them, and recognise the importance of the various options available to provide specialist support.

Many examples demonstrate that the force understands the importance of developing good contacts with different communities, if not directly, then through local partners, volunteers and networks of key individuals. The Safer Peterborough partnership makes good use of 'community connectors' to communicate with the Slovak, Lithuanian, Latvian and Romanian communities. However, the independent advisory group, Cambridgeshire Independent Advisory Network, needs to be developed and the force is aiming to broaden the membership of the network to improve involvement with communities across Cambridgeshire, particularly with under-represented groups.

#### Identifying and understanding the issues

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 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 Cambridgeshire Constabulary 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, Cambridgeshire Constabulary recorded 254 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 constabulary recorded 51 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 Cambridgeshire Constabulary is 'other neglect or failure in duty'. <sup>10</sup> It is important to note, however, an issue identified during our 2014 police integrity and corruption inspection; <sup>11</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.

<sup>&</sup>lt;sup>10</sup> Independent Police Complaints Commission data is available at: www.ipcc.gov.uk/reports/statistics/police-complaints/police-performance-data

<sup>&</sup>lt;sup>11</sup> *Integrity matters*, HMIC, January 2015. Available from: www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/

The force has mechanisms in place to record and analyse information about police treatment of the public. Senior members of the force described a broad range of opportunities to record, monitor and analyse information on police treatment of the public, and identified improving awareness and corporate oversight. A wide variety of groups assess the information:

- the alliance's joint professional standards department (PSD) governance group considers data on complaints, and its work is scrutinised by the force's chief constable and police and crime commissioner;
- an independent scrutiny group, chaired by a member of the community, examines coercive powers, including the use of body-worn video cameras, using data supplied by area commanders;
- Hertfordshire Constabulary collates and scrutinises feedback from independent custody visitors on behalf of the alliance;
- an operational review panel meets monthly to review HMIC and IPCC recommendations; and
- an out-of-court disposals panel examines the force's decision-making.

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.

The PSD circulates a bulletin summarising the lessons drawn from these reviews across the whole of the alliance. The force has commissioned a domestic abuse victim survey to enable it to improve its service. Bedfordshire Police and Hertfordshire Constabulary will also conduct this survey in their areas.

An operational review panel considers all recommendations from inspecting bodies such as HMIC, Ofsted or the Independent Police Complaints Commission (IPCC). The panel meets monthly to track progress in implementation of recommendations and to hold to account those responsible for implementing them. The professional standards department circulates a 'lessons learnt' bulletin across the alliance by email and posts it on the respective forces' intranets. However, the operational review panel does not yet consider all information from the community, partners, police and crime commissioner and MPs. Although it records this information, it does not collate it in one place. The force should consider how well it reviews all the information it receives to identify learning to improve its treatment of the public.

In August 2014, after HMIC's 2013 inspection on the effective and fair use of stop and search powers, 12 the Home Office published guidance to police forces on how to implement the Best Use of Stop and Search (BUSS) scheme. 13 The scheme aims to increase transparency and community involvement, and to support a more intelligence-led use of the powers leading to better outcomes. All police forces in England and Wales signed up to participate in the scheme. In 2015, HMIC's legitimacy inspection considered the extent to which the force was complying with the scheme and found that it did not comply with three features of the scheme. Consequently, the Home Secretary suspended the force from participation in the scheme. In 2016, we revisited the force to assess its compliance with the scheme and found that it complied with all features of the scheme and the Home Secretary subsequently lifted the suspension. Details of our revisit can be found on HMIC's website at <a href="https://www.justiceinspectorates.gov.uk/hmic/publications/best-use-of-stop-and-search-scheme">www.justiceinspectorates.gov.uk/hmic/publications/best-use-of-stop-and-search-scheme</a>

# 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

Cambridgeshire Constabulary is good at acting on feedback and learning to improve the way it treats all the people it serves. Last year HMIC recommended that the force improve its website and the force has now agreed a two-year plan to upgrade it. In the meantime, it is developing some good work as part of the alliance public contact programme. For example, it is introducing 'Track my Crime' to enable victims of crime to check the progress of their investigation online.

The joint PSD produces a newsletter called The Shield, which is available on each force intranet and contains information on what needs to be improved and how to go about it. The Cambridgeshire Independent Advisory Network is an independent scrutiny group, chaired by a nominated member of the community, which looks at

<sup>12</sup> Stop and Search Powers – are the police using them effectively and fairly? HMIC, July 2013. Available from: <a href="https://www.justiceinspectorates.gov.uk/hmic/publications/stop-and-search-powers-20130709/">www.justiceinspectorates.gov.uk/hmic/publications/stop-and-search-powers-20130709/</a>

<sup>&</sup>lt;sup>13</sup> Best Use of Stop and Search Scheme, Home Office, August 2014 <a href="https://www.gov.uk/government/uploads/system/uploads/attachment\_data/file/346922/Best\_Use\_of\_Stop\_a">www.gov.uk/government/uploads/system/uploads/attachment\_data/file/346922/Best\_Use\_of\_Stop\_a</a> nd\_Search\_Scheme\_v3.0\_v2.pdf

coercive powers such as stop and search; it also scrutinises the use of body-worn video cameras. It provides analysis that enables local police commanders to address any local performance problems, including those related to body-worn video cameras. Hertfordshire Constabulary is also responsible for gathering feedback from the independent custody visitors on behalf of the alliance and feeding back any recommendations.

The joint learning and development unit attends the Cambridgeshire strategic stop and search group, and as a result has run one-day courses for frontline officers and will offer the College of Policing two-day course when it is released, as well as one-day specialist role courses. The unit also has regular contact with the PSD to gather 'lessons learnt' to incorporate into joint development plans, which also include IPCC findings. The unit is meant to provide organisational learning across the alliance, but it is not yet capable of doing so on behalf of all three forces.

#### **Demonstrating effectiveness**

We found good examples of the force contacting the public in different ways, including face-to-face, through social media and in Peterborough via the 'You said ... we did' scheme, with positive feedback from the public.

The force also uses a wide range of Watch schemes, such as Neighbourhood Watch and Countryside Watch. Volunteers raise concerns about local problems with local police teams – including treatment – and feed back to their groups on police and partner initiatives. When volunteers reported that Countryside Watch members felt vulnerable and unfairly treated because they had seen police resources reduce in their community, the chief constable held a community meeting and as a result increased the number of police officers and PCSO staff in the refreshed rural crime action team.

### **Summary of findings**



Cambridgeshire Constabulary has a good understanding of the importance of treating the people it serves with fairness and respect. This is an integral part of its mission, vision and values, and most officers and staff have a good understanding of what this means for their day-to-day work.

It has a good corporate communications strategy designed to build confidence and trust across the workforce, partners and the people who live and work in Cambridgeshire. However, the strategy does not specifically address how the force should gather and analyse information on police treatment of the public to improve confidence and trust.

The force uses a broad range of opportunities to record, monitor and analyse information on police treatment of the public and it is good at acting on feedback and learning to improve the way it treats all the people it serves. It demonstrates that it is doing so through its stop and search scrutiny group, its use of the learning from IPCC bulletins and the way it reviews complaints and misconduct trends and patterns. Further development of the independent advisory group should improve its understanding of issues related to treatment that have the greatest effect on diverse groups.

#### **Areas for improvement**

 The force should improve how it identifies and understands the issues that have the greatest impact on public perceptions of fair and respectful treatment.

# 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>14</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>15</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.

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>16</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.

<sup>&</sup>lt;sup>14</sup> *Integrity Matters*, HMIC, January 2015. Available from: www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/

<sup>&</sup>lt;sup>15</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

<sup>&</sup>lt;sup>16</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 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\_REPOR\_T.pdf and Literature Review – Police integrity and corruption, HMIC, January 2015. Available at: www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/

#### **Initial vetting**

The alliance has a fully collaborated vetting unit. This provides all vetting services to the three forces within the alliance. The head of the alliance professional standards directorate (PSD) has oversight of the process and the force's 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 is only partly based upon the national vetting policy. We were told that the alliance's approach to vetting police employees, volunteers and contractors is based on common sense and risk management. The decision as to who 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 all databases in 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.

The alliance unit has been reviewed to ensure that it has sufficient resources to address the current and future requirements of the alliance. A recent decision has been made to double the size of the vetting unit. Although this is encouraging, consideration needs to be given to the short-term risks while the additional staff are recruited, trained and reach a level of operational competence. Discussions are taking place about expanding the vetting unit's remit to cover a further four forces. In the meantime, the senior responsible officer recognises the risks and is seeking support from other force vetting units to reduce the backlog and increase capacity to deal with the additional recruitment vetting requirements. The vetting unit does not review who has been screened out as a result of the vetting process and therefore misses an opportunity to address potential disproportionality in terms of protected characteristics, such as age, disability, race and religion or belief.

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 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

Cambridgeshire Constabulary regularly clarifies and reinforces standards of behaviour to its workforce, including:

- the leadership seminar for line managers, with a contribution from the head of PSD about unacceptable behaviour, including the abuse of authority for sexual gain. A video of the seminar is available for viewing by the wider workforce;
- PSD advice to new officers on how to improve the security of their social media accounts and on what information should be made public; and
- setting out policy on the intranet, which includes posting a regular PSD newsletter, The Shield.

The force communicates clear messages about its mission, vision and values on the intranet and in the training for both new and newly promoted officers and staff. Sharing criminal and misconduct cases also helps officers and staff understand the consequences of particular behaviour.

HMIC's 2014 integrity and corruption inspection report recommended that the force should ensure that within six months it had communicated to all staff the requirements about declaring notifiable associations, <sup>17</sup> secondary employment, business interests, and gifts and hospitality. This year we found that the force could do more to clarify to all officers and staff what is acceptable in terms of receiving gifts and hospitality, personal business interests and what 'notifiable associations' means, because awareness of the policies among officers and staff was variable. Where they did understand the policies, not all the staff we spoke to understand how to declare or report issues.

The anti-corruption unit (ACU) and PSD are implementing a programme of improvement, having recognised that their capability and capacity are inadequate, which contributed to a serious case collapsing at court. Following a review of the ACU, the new head was charged with developing an action plan for implementation by June 2017. This includes the development of an improved communications strategy on anti-corruption and integrity.

22

<sup>&</sup>lt;sup>17</sup> A notifiable association policy is designed to identify those individuals who could pose a risk to the integrity of an individual employee or the force itself. It requires the officer or staff member to report such associations which then allows a full evaluation of the risk posed to both the individual and the force to be undertaken.

# 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. 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>19</sup> The PSD governance group continually monitors unacceptable behaviour identified from public complaints.

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>20</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-

<sup>&</sup>lt;sup>18</sup> Integrity Matters, HMIC, January 2015. Available from: www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/

<sup>&</sup>lt;sup>19</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

<sup>&</sup>lt;sup>20</sup> ACPO / ACPOS National Vetting Policy for the Police Community, Association of Chief Police Officers, 2012. Available from: <a href="www.northants.police.uk/files/documents/Freedom Of Information/ac^ACPO National Vetting Policy.pdf">www.northants.police.uk/files/documents/Freedom Of Information/ac^ACPO National Vetting Policy.pdf</a>
ACPO is now the National Police Chiefs' Council.

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 Cambridgeshire Constabulary 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 Cambridgeshire Constabulary, 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. Cambridgeshire Constabulary 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 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

Cambridgeshire Constabulary and the alliance are developing the way they look for, report and assess intelligence on potential corruption. We found that officers and staff are aware of the anonymous route to report wrongdoing. A small number of them have used this method, while others reported their concerns to a line manager.

The force and alliance need to improve how well they assess all sources of intelligence and potential corruption; this is currently limited because of problems with capacity. However, this is being addressed through the PSD/ACU action plan.

HMIC's 2014 police integrity and corruption inspection recommended that the force and alliance should develop within six months a process that examines, prioritises and records corruption-related intelligence. The PSD has recently introduced a tactical tasking and co-ordination group process to undertake this work. The biweekly PSD ACU meeting ensures all activity is recorded and arranges appropriate oversight. It is developing a risk assessment for prioritising activity, with plans to introduce the 'management of risk in law enforcement'<sup>21</sup> (MoRiLE) risk assessment into the group.

# 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>22</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." 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*<sup>23</sup> – 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".

<sup>21</sup> Management of risk in law enforcement (MoRiLE) develops a range of methods to assist decision-makers in identifying and prioritising threat, risk and harm, and links them to an organisational capacity and capability to respond.

<sup>&</sup>lt;sup>22</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
e\_sexual\_violence.PDF

<sup>&</sup>lt;sup>23</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

The most recent national counter-corruption assessment, in 2013, highlighted corruption for the purposes of sexual gratification as a major threat to law enforcement. HMIC's 2015 report *Integrity matters* 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' response 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 head of the ACU has prepared an awareness briefing on the anti-corruption strategy for the alliance, which was presented to senior leaders from all alliance forces in June 2016. The briefing gives an overview of the main elements of corrupt practice and of current concerns about sexual and predatory behaviour towards vulnerable people, especially victims of domestic abuse. It covers methods of reporting and maintaining confidence in the service provided by staff in cases in which misconduct cannot be proven; for instance, denying a staff member suspected of misconduct access to some IT functions. The presentation is supported by academic research, which examined the findings from a sample of 500 officers in three forces who were asked a series of scenario-based questions to test their response to integrity issues. The ACU is also considering working with the Lucy Faithful Foundation to examine the learning available from its research into sexual offending by professionals from all walks of life.

Some frontline staff are aware of the seriousness of sexual misconduct, and we found examples of local senior management teams reviewing their teams to – as they told us – "hunt out problem individuals, making no assumptions and being aware and alive to the issues".

<sup>&</sup>lt;sup>24</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 on 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>&</sup>lt;sup>25</sup> Integrity Matters, HMIC, January 2015. Available from: www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/

## 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 force should do more to ensure that all frontline officers and staff are aware of the early signs of officers and staff abusing their authority for sexual gain.

The force has not communicated effectively to the whole workforce how serious an offence it is for officers and staff to abuse their position for sexual gain. The head of the PSD has attended the chief constable's leadership seminars and talked to first-line managers and those more senior about sexual impropriety, with the intention that these managers should brief their teams.

#### **Building public trust**

The alliance PSD has a communications 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 alliance 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.

# 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>26</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.

#### Working with the public

HMIC found information available on the force's website about the outcomes of disciplinary hearings up to December 2015, including one case, recorded as discontinued, of gross misconduct for developing a relationship with a vulnerable female. The force planned a public misconduct hearing, but the officer resigned before it took place. The force does not publish on its website a register of gifts and hospitality.

#### Working with the workforce

The PSD publishes regular updates on the outcomes of complaints and misconduct cases on the intranet, and we found that officers and staff are aware of the principal issues and of how to find information on the details of the investigations.

<sup>&</sup>lt;sup>26</sup> Literature Review – Police integrity and corruption, HMIC, January 2015. Available at: www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/

### **Summary of findings**



#### Requires improvement

We found that Cambridgeshire Constabulary 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 as well as specialist training. However, HMIC has serious concerns that the force, and its alliance partners, are not yet in a position to ensure that its workforce behaves ethically and fairly.

We found that too few of the recommendations we made in our 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 with 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 joint professional standards department (PSD), which includes the anti-corruption unit (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 the PSD and the ACU who have the 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

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

- review the capacity and capability of its professional standards department and anti-corruption unit 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 how it clarifies and reinforces standards of behaviour, in particular when dealing with vulnerable people, including victims of domestic abuse.

# 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. 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>28</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.

#### Identifying and understanding the issues

Cambridgeshire Constabulary is committed to understanding the issues that have the greatest impact on staff and volunteers. The chief officer team is visible and is regularly involved with the workforce, encouraging feedback through a range of channels, including the chief constable's seminars, blogs, the social media tool

http://whatworks.college.police.uk/Research/Documents/150317\_Fair\_cop%202\_FINAL\_REPORT.pd f Organisational justice: Implications for police and emergency service leadership, Herrington C and Roberts K, AIPM Research Focus, Issue 2, 2013. Available at: <a href="https://www.aipm.gov.au/wp-content/uploads/2013/08/Org-Justice-Final.pdf">www.aipm.gov.au/wp-content/uploads/2013/08/Org-Justice-Final.pdf</a>

<sup>&</sup>lt;sup>27</sup> It's a Fair Cop 2: Organisational justice, behaviour and ethical policing, College of Policing, 2015. Available at:

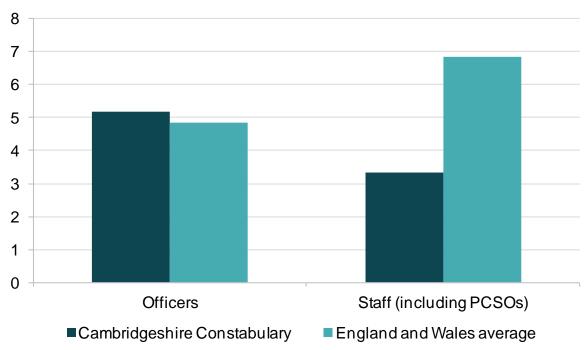
<sup>&</sup>lt;sup>28</sup> It's a Fair Cop 2: Organisational justice, behaviour and ethical policing, College of Policing, 2015, page 11. Available at:

http://whatworks.college.police.uk/Research/Documents/150317\_Fair\_cop%202\_FINAL\_REPORT.pd f

'Yammer', and the 'answer bank', where officers and staff can post questions to the chief officer team or heads of department. The force has not conducted a formal survey of all staff since 2013, but at the time of our inspection had plans to conduct a three-force survey with the alliance in June 2016. The force listens to its workforce and involves them in a wide range of decision-making. It has positive relationships with staff associations and networks, and clear lines of communication from the front line to the chief constable. The chief officer team actively encourages officers and staff to attend their local senior management team meetings and planning days. We were told by officers and staff that Cambridgeshire Constabulary has an open culture in which officers and staff are able to express their views.

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 Cambridgeshire Constabulary 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, Cambridgeshire Constabulary finalised 5.2 formal grievances raised by officers per 1,000 officers, which was broadly in line with the England and Wales average of 4.8 per 1,000 officers. During this period, the constabulary finalised 3.3 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).

#### Making improvements and demonstrating effectiveness

Cambridgeshire Constabulary is committed to improving the way it treats its workforce. After the last survey in 2013, the force developed its current people plan to focus on the areas that most affect the workforce.

The deputy chief constable chairs the equality, ethics and inclusion board, which links into its counterpart board in the alliance. The board has good attendance from staff associations, unions and support networks, and consults them on fairness and respect in the force, inviting them to put forward issues they have identified as important; for example, staff coaching, flexible working and arrangements for those with caring responsibilities.

HMIC found that in some areas of the force that officers and staff felt the force could communicate better with its workforce to demonstrate that it is taking action in response to perceived problems with fairness, such as in selection processes and temporary appointments. This is particularly important when there are a high number of acting or temporary first-line managers, some of whom have been acting for long periods and then have failed the promotion process.

The force has not evaluated the impact on the workforce of the changes to organisational functions that the collaboration programme team introduced, and is only now developing an understanding of it through consultation with staff, including senior leadership teams down to inspector and police staff grade equivalent. It has aligned its policies on issues such as police staff discretionary leave, staff discipline, leave allocations and staff pay with those of the other forces in the alliance.

The alliance has made progress on its review and implementation of policies and processes, including the postings and promotions policy, the attendance management process, flexible working and absence management. It is now developing standard terms and conditions for police staff and a standard fitness test for all forces in the alliance.

# 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

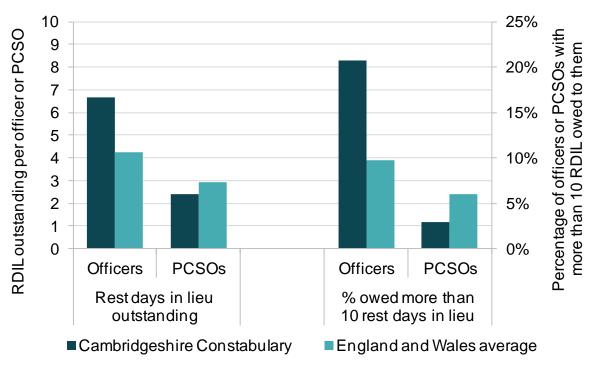
Cambridgeshire Constabulary is good at supporting the wellbeing of its workforce and it has continued to develop a range of approaches that demonstrate that it understands and values the benefits of workforce wellbeing. The alliance wellbeing board has a comprehensive high-level plan, and a chief officer chairs the local Cambridgeshire Constabulary wellbeing board, which has clear priorities that include both physical and mental wellbeing. The chief officer team leads by example, taking part in well-publicised initiatives to improve physical and mental health, such as '#try20' to get people walking for 20 minutes a day. The force also works well with the staff associations to ensure that wellbeing services can offer timely support to staff who may need rest, recuperation and rehabilitation facilities.

#### Identifying and understanding the workforce's wellbeing needs

Cambridgeshire Constabulary has a good understanding of the workforce's wellbeing needs through listening to officers and consulting staff associations and networks. It has trained some of its workforce to identify mental and physical health problems. We spoke with first-line managers who have been trained and they felt that this had helped them to understand what to look for and how to access support. Not all supervisors, though, were confident that they knew how to access support, and the force could do more to communicate to acting and temporary supervisors on matters of wellbeing. The force provides effective health screening for officers and staff.

Rest days in lieu (RDIL) are leave days owed to officers or PCSOs when they have been required to work on their scheduled rest day for 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 a useful way for forces to identify and understand potential wellbeing concerns for individuals and teams.

Figure 4: 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 Cambridgeshire Constabulary compared with England and Wales, as at 31 March 2016



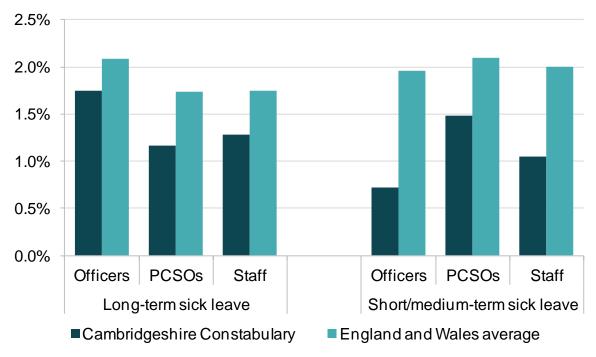
Source: HMIC Legitimacy data collection

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 4 please see annex A.

As at 31 March 2016, there were 6.7 rest days in lieu outstanding per officer in Cambridgeshire Constabulary, which was higher than the England and Wales average of 4.2 days per officer. On the same date, there were 2.4 rest days in lieu outstanding per PCSO in the constabulary, which was broadly in line with the England and Wales average of 2.9 days per PCSO. As at 31 March 2016, 20.8 percent of officers in Cambridgeshire Constabulary had more than 10 rest days in lieu owed to them, which was higher than the England and Wales average of 9.8 percent. As at 31 March 2016, 3.0 percent of PCSOs in the constabulary had more than 10 rest days in lieu owed to them, the England and Wales average was 6.0 percent of PCSOs. The data on PCSOs did not allow a comparison with the average.

Sickness data can provide a useful point of comparison for assessing the wellbeing of police workforces. Analysis of these 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 5: Percentage of officers, police community support officers and staff on long-term and short/medium-term sick leave in Cambridgeshire Constabulary 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 5 please see annex A.

Figure 5 provides data on the proportion of officers, PCSOs and staff who were absent due to sickness on 31 March 2016.

- 1.7 percent of officers were on long-term sick leave, which is broadly in line with the England and Wales average of 2.1 percent.
- 0.7 percent of officers were on short or medium-term sick leave, which is lower than the England and Wales average of 2.0 percent.
- 1.2 percent of PCSOs were on long-term sick leave, which is broadly in line with the England and Wales average of 1.7 percent.
- 1.5 percent of PCSOs were on short or medium-term sick leave, which is broadly in line with the England and Wales average of 2.1 percent.
- 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.
- 1.0 percent of staff were on short or medium-term sick leave, which is lower than the England and Wales average of 2.0 percent.

On 31 March 2016 Cambridgeshire Constabulary had a lower proportion of police officers on recuperative duty, at 0.9 percent compared with the national average for England and Wales of 3.2 percent.

During the inspection we heard about the 'resilience team' in Peterborough, set up to manage those on recuperative or restricted duties. Officers returning to work after long- term injury or illness join the team with a plan designed to return them to full duties as quickly as possible. The plan lasts for up to three months and is reviewed continuously. In this way the force aims to ensure that those who are injured or restricted feel valued, are employed appropriately and return to full duties as soon as possible. The force should consider adopting this approach across the force area. We reviewed sickness levels as at 31 March 2016 and found that the force's short and medium-term sickness levels for both police officers and police staff are lower than the England and Wales average.

Supporting workforce wellbeing is now a routine part of business for senior management teams, who discuss wellbeing, workloads, overtime and absence rates at monthly meetings and review management information to identify patterns or trends. Ensuring the wellbeing of all officers and staff is also an objective in performance development reviews.

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

The alliance is about to open a new stand-alone wellbeing suite in Sandy to improve access to wellbeing services for Bedfordshire Police, Cambridgeshire Constabulary and Hertfordshire Constabulary.

The force provides a good occupational health service, and officers and staff have access to counselling through self-referral as well as through management referrals.

It manages sickness effectively and is good at supporting people back into work, as demonstrated by the large number of staff in recuperative posts, reducing during the last year. Cambridgeshire Constabulary had more than double the level of officers on recuperative duties (7 percent) compared with England and Wales as at 31 March 2015. This has reduced to 0.9 percent, which is lower than the England and Wales average as at 31 March 2016.

Officers and staff in high-risk roles such as child abuse investigation and anticorruption units do not routinely receive specialist support beyond one-to-one meetings. The force should implement more effective measures to prevent ill-health among officers and staff in high-risk roles.

The force and alliance are going through a period of change with their new joint HR function, which will result in less reliance on direct support from HR professionals and more on input from managers. HMIC considers this will be a challenge for the large number of acting sergeants who have not been through the sergeants' development programme and may not be fully equipped with the management skills

and expertise needed to provide the right level of support to their staff. We also identified some supervisors who do not feel adequately prepared and supported to intervene early and effectively to improve wellbeing, and noted several vacancies in wellbeing advisor posts and some occupational health roles. The force and alliance should ensure that they have enough staff to fill these roles.

## 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>29</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>30</sup>

#### The performance assessment process

The force has a well-established individual performance assessment process (referred to as the personal development review (PDR)). The accountability structure includes regular one-to-one meetings between staff and their line managers, providing an opportunity for officers and staff to review their performance and to identify development needs and welfare needs. The force records and retains evidence, on an electronic system, of positive feedback and developmental needs throughout the year for consideration in one-to-one and annual PDR meetings. Supervisors review individual performance against behavioural competencies and the policing professional framework. The force reported that it has a high completion and compliance rate for the performance assessment process. In the 12 months to 31 March 2016, 79 percent of the workforce had completed the process.

#### The results of performance assessment

HMIC found mixed perceptions of the consistency, fairness and value of the PDR process, although many staff value their one-to-one meetings with line managers. Staff not seeking promotion or development were less involved in the process and did not see it as being relevant to them.

<sup>&</sup>lt;sup>29</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.pd <u>f</u>

<sup>&</sup>lt;sup>30</sup> College of Policing guidance on the police performance development review process is available at: <a href="https://www.college.police.uk/What-we-do/Support/Reviewing-performance/Pages/PDR.aspx">www.college.police.uk/What-we-do/Support/Reviewing-performance/Pages/PDR.aspx</a>

Most officers and staff we spoke with agreed that the force PDR system is fair. They are able to comment on their PDR at the end of the reporting period, but there is no follow-up process if an individual is unhappy with the outcome. The force should ensure that officers and staff understand how they can challenge the content of their PDR if they do not agree with it.

The force does not evaluate the quality of the performance assessment process, and this means that not all the workforce may receive the continuous development that they should.

The force is using 'unsatisfactory performance' procedures to address poor performance and we were told that poor performance is managed through action plans. However, the challenging of poor performance depends on the line manager, and the process can be time-consuming and frustrating. Overall, we found most officers and staff believed that managers are now more likely to challenge underperforming staff, which is a positive development.

The force uses both formal and ad-hoc methods to recognise and reward individual performance, such as the chief constable's and district commander's commendations.

### **Summary of findings**



Good

Cambridgeshire Constabulary is good at ensuring it treats its workforce with fairness and respect. It demonstrates this in the way it seeks feedback and challenge from its workforce, and in the way it provides for the wellbeing of its workforce, particularly through preventative and early action in response to wellbeing concerns.

The force has a well-established personal development review (PDR) process. Most officers and staff we spoke with agreed that the force's PDR system is fair. Overall, we found most officers and staff believed that managers are now more likely to challenge underperforming staff, which is a positive development.

At the time of our inspection, the alliance was due to conduct an all-staff survey in June 2016, and this should further improve its understanding of the perceptions and needs of its workforce.

#### Area for improvement

• The force should ensure that its supervisors can recognise and provide support with wellbeing issues.

### **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, <a href="www.gov.uk/government/collections/police-workforce-england-and-wales">www.gov.uk/government/collections/police-workforce-england-and-wales</a>, or the Home Office police workforce open data tables, <a href="www.gov.uk/government/statistics/police-workforce-open-data-tables">www.gov.uk/government/statistics/police-workforce-open-data-tables</a>. 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>31</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.

www.ipcc.gov.uk/sites/default/files/Documents/statutoryguidance/guidance\_on\_recording\_of\_complaints\_under\_PRA\_2002.pdf

<sup>&</sup>lt;sup>31</sup> Guidance on the recording of complaints under the Police Reform Act 2002, Independent Police Complaints Commission. Available at:

# Figure 4: 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 4 were provided to HMIC by individual forces via a bespoke data collection in April 2016 prior to inspection.

# Figure 5: 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 5 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