



Promoting improvements  
in policing to make  
everyone safer

# PEEL: Police legitimacy 2016

An inspection of City of London Police



December 2016

© HMIC 2016

ISBN: 978-1-78655-278-5

[www.justiceinspectors.gov.uk/hmic](http://www.justiceinspectors.gov.uk/hmic)

# Contents

<b>Introduction</b> .....	<b>4</b>
<b>Force in numbers</b> .....	<b>6</b>
<b>Overview – How legitimate is the force at keeping people safe and reducing crime?</b> .....	<b>8</b>
<b>To what extent does the force treat all of the people it serves with fairness and respect?</b> .....	<b>10</b>
To what extent does the force understand the importance of treating the people it serves with fairness and respect?.....	10
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? .....	11
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? .....	16
Summary of findings .....	17
<b>How well does the force ensure that its workforce behaves ethically and lawfully?</b> .....	<b>18</b>
How well does the force develop and maintain an ethical culture?.....	18
How well does the force identify, understand and manage risks to the integrity of the organisation? .....	19
How well is the force tackling the problem of officers and staff abusing their authority for sexual gain?.....	22
How well does the force engage with the public and its workforce about the outcomes of misconduct and corruption cases? .....	25
Summary of findings .....	26
<b>To what extent does the force treat its workforce with fairness and respect?.</b> <b>28</b>	
How well does the force identify and act to improve the workforce’s perceptions of fair and respectful treatment? .....	28
How well does the force support the wellbeing of its workforce? .....	31

How fairly and effectively does the force manage the individual performance of its officers and staff? ..... 34

Summary of findings ..... 36

**Next steps ..... 38**

**Annex A – About the data..... 39**

## Introduction

As part of our annual inspections of police effectiveness, efficiency, legitimacy and leadership (PEEL), Her Majesty's Inspectorate of Constabulary (HMIC) assesses the legitimacy of police forces across England and Wales.

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

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

To achieve this support – or 'consent' – the public needs to believe that the police will treat them with respect and make fair decisions (while taking the time to explain those decisions), as well as being friendly and approachable.<sup>1</sup> This is often referred to as 'procedural justice'. Police actions that are perceived to be unfair or disrespectful can have extremely negative results for police legitimacy in the eyes of the public.

Police officers and staff are more likely to treat the public with fairness and respect if they feel that they themselves are being treated fairly and respectfully, particularly by their own police force. It is therefore important that the decisions made by their force about the things that affect them are perceived to be fair.<sup>2</sup> This principle is described as 'organisational justice', and HMIC considers that, alongside the principle of procedural justice, it makes up a vital aspect of any assessment of police legitimacy.

---

<sup>1</sup> *It's a fair cop? Police legitimacy, public cooperation, and crime reduction*, National Policing Improvement Agency, September 2011. Available at:  
[http://whatworks.college.police.uk/Research/Documents/Fair\\_cop\\_Full\\_Report.pdf](http://whatworks.college.police.uk/Research/Documents/Fair_cop_Full_Report.pdf)

<sup>2</sup> *Fair cop 2: Organisational justice, behaviour and ethical policing*, College of Policing, 2015. Available at:  
[http://whatworks.college.police.uk/Research/Documents/150317\\_Fair\\_cop%20FINAL\\_REPORT.pdf](http://whatworks.college.police.uk/Research/Documents/150317_Fair_cop%20FINAL_REPORT.pdf)

One of the most important areas in which internal organisational justice and external procedural justice principles come together is the way in which police forces tackle corruption. How this is done needs to be seen to be fair and legitimate in the eyes of both the police workforce and the general public.

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

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

## Force in numbers



### Workforce

Total workforce as of 31 March 2016

**1,116**

Total workforce breakdown as of 31 March 2016

officers

**702**

staff

**399**

PCSOs

**15**



### Ethnic diversity

Percentage of BAME in workforce 31 March 2016

overall workforce

**11.4%**

officers

**6.3%**

staff

**20.0%**

PCSOs

—

Percentage of BAME in local population, 2011 Census

**21.4%**



### Gender diversity

Percentage of females in overall workforce 31 March 2016

**35%**

City of London  
Police

**51%**

England and Wales  
population, 2011 Census

Percentage of females by role 31 March 2016

**23%**

officers

**57%**

staff

PCSOs

—



## Public complaints

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

Officers

City of London Police

134

England and Wales force average

268

Staff (including PCSOs)

14

61



## Grievances

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

Officers

City of London Police

1.4

England and Wales force average

4.8

Staff (including PCSOs)

4.8

6.8



## Victim satisfaction

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

City of London Police

94.3%

England and Wales force average

93.4%

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

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

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

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



**Good**

City of London Police has been assessed as good in respect of the legitimacy with which it keeps people safe and reduces crime. The force is good at treating all the people it serves with fairness and respect. It is also good in how it ensures that its workforce behaves ethically and lawfully. However, the force requires improvement in its approach to making sure it treats its workforce with fairness and respect. Our findings this year are consistent with last year's findings, in which we judged the force to be good in respect of legitimacy.

### Overall summary

City of London Police is good at treating all the people it serves with fairness and respect. The Code of Ethics has been incorporated into its policies and practice, officers and staff have a good knowledge of the code and its requirements. The force also engages well with its communities. However, it could do more to develop its understanding of the issues that have the greatest impact on public perceptions of fair and respectful treatment and, it should do more to demonstrate to the public that it has acted on feedback.

The force is good at ensuring that its workforce behaves ethically and lawfully. It reinforces standards of acceptable and unacceptable behaviour to its entire staff and has effective vetting policies and processes in place. As a result, it has developed and maintained an ethical culture. The force also effectively identifies threats to its integrity by robust and frequent monitoring of its staff. However, it should develop its counter-corruption strategy to meet the threats that the force has identified as well as improving its approach to identifying staff who seek to abuse their authority for sexual gain.

The force uses a range of methods to identify the areas that have the greatest effect on workforce perceptions of fair and respectful treatment. These include enabling the workforce to provide direct feedback to senior leaders and staff surveys. However, the force could do more to demonstrate how it has responded to staff concerns. This includes closer working with staff associations and networks. The force has invested considerably in reviewing and re-launching its personal development review process.

---

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



However, the process lacks central oversight and the force has some work to do before it can be confident that it can demonstrate that its performance assessment for officers and staff is fair and effective.

## **Recommendations**

HMIC has not identified any causes of concern and therefore has made no specific recommendations.

### **Areas for improvement**

- The force should improve how it demonstrates that it has taken action to improve how it treats all the people it serves.
- 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 to its workforce, in particular when dealing with vulnerable people, including victims of domestic abuse.
- The force should improve how it identifies and understands its workforce's wellbeing needs.
- The force should improve how it manages individual performance of its officers and staff.

## 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>4</sup>

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

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

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

It is important for the police to understand that it is procedural justice – making fair decisions and treating people with respect – that drives police legitimacy in the eyes of the public, over and above police effectiveness at preventing and detecting crime.<sup>5</sup> HMIC assessed the extent to which the importance of procedural justice was reflected in the force’s vision and values, and the extent to which it was understood by the workforce.

### Organisational values

The importance of treating people with fairness and respect is central to the published values of the City of London Police; this was reflected by the officers and staff with whom we spoke. HMIC found that its workforce were equipped with the knowledge, skills and understanding they need to treat all the people they serve fairly and with respect. HMIC’s 2015 legitimacy inspection found that the force had

---

<sup>4</sup> *It’s a fair cop? Police legitimacy, public cooperation, and crime reduction*, National Policing Improvement Agency, September 2011. Available at: [http://whatworks.college.police.uk/Research/Documents/Fair\\_cop\\_Full\\_Report.pdf](http://whatworks.college.police.uk/Research/Documents/Fair_cop_Full_Report.pdf)

<sup>5</sup> *Ibid.*

effectively promoted the Code of Ethics<sup>6</sup> and incorporated the code into its policies and practice. The force has built on this by continuing to make sure that the code is promoted and understood by all staff and volunteers by providing mandatory training. It has reinforced this understanding through a variety of ways including the 'commissioner's blog' and interventions by the professional standards department (PSD).

In addition, the code is easily accessible on the intranet as are the force values. The force has also maintained its practice of embedding the code within policies and procedures and it is a significant part of all internal vacancy and promotion processes.

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

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

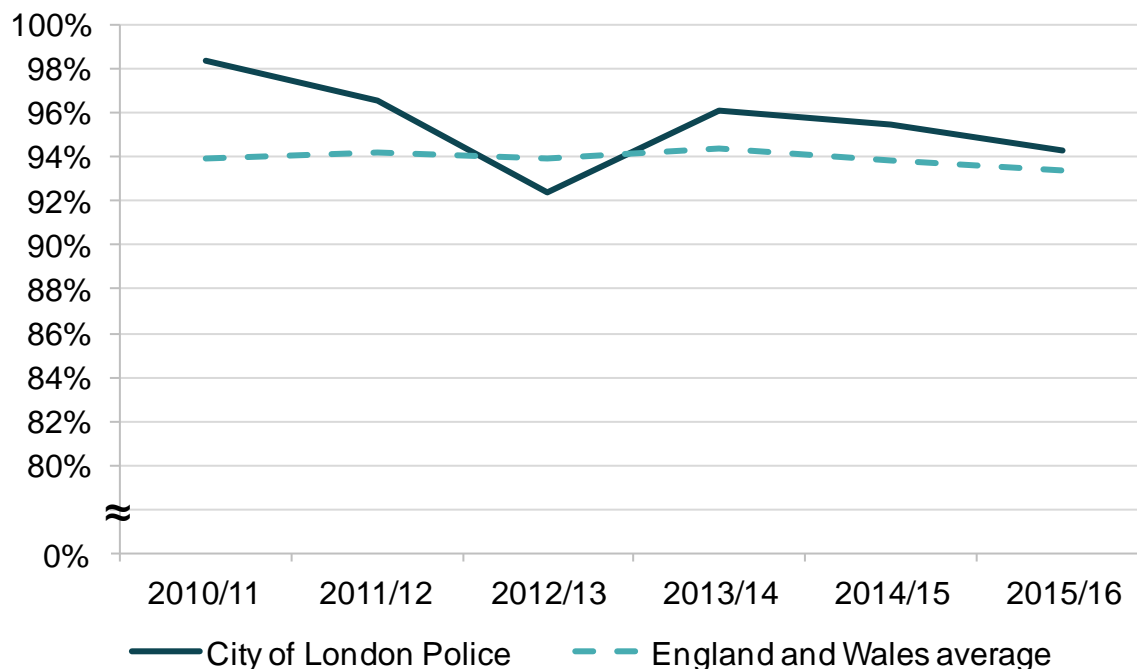
### **Seeking feedback and challenge**

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 services provided to them by the police and inform forces' improvements to their service provision, including examining how well victims feel they are treated.

---

<sup>6</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 from: [www.college.police.uk/What-we-do/Ethics/Documents/Code\\_of\\_Ethics.pdf](http://www.college.police.uk/What-we-do/Ethics/Documents/Code_of_Ethics.pdf)

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



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

In the 12 months to 31 March 2016, 94.3 percent of all victims of crime (excluding hate crime) who responded to the victim satisfaction survey were satisfied with the overall treatment provided by City of London Police, which was broadly in line with the England and Wales average of 93.4 percent; and lower than the 95.5 percent who were satisfied with the overall treatment that the force provided in the 12 months to 31 March 2015; this is not a statistically significant difference.

The force identifies its communities as residential, business, and transient i.e. those who visit the City to work or for recreation. By having a good understanding of the diverse needs of these distinct groups the force recognises that effective engagement requires the use of a wide range of techniques.

We found evidence of extensive engagement, consultation and work between the force and the City of London Corporation,<sup>7</sup> international banking businesses, licensing, retail and local residents. The force demonstrated that it has a comprehensive understanding of the different communities and people within the City of London. This understanding provides a guide for providing the force’s policing services.

<sup>7</sup> The City of London Corporation is the municipal governing body for the City of London.

The force also recognises that, given its diverse communities, over-reliance on traditional methods such as public perception surveys can be of limited benefit, so it has developed appropriate methods for communicating with each community. For example, the force ensures it makes contact with the business community through social network sites such as Twitter while at the same time deploying community beat managers within its residential communities.

The force has established effective methods of reaching groups that may have less trust and confidence in the police. For instance, it engages well with the Bangladeshi community that lives within the City of London. It has deployed officers from a similar cultural background into the community. By doing so, it has a better understanding of problems and any relevant cultural context. It has ensured that community engagement events are accessible to all members of the community and that the people who could be considered to 'harder to reach' are provided with better opportunities to communicate with officers.

The force has improved its relationship with the force independent advisory group. Members felt that the force was able to demonstrate openness in its communication with the group. The group is involved in the development of policy and procedure, which has not always been the case. The force actively seeks the views of the members of the group and responds in a timely and effective manner.

However, the force could do more to develop its understanding of the issues that have the greatest impact on public perceptions of fair and respectful treatment. HMIC found only limited evidence of the force seeking feedback and challenge, or identifying and understanding the issues about the extent to which the force treats people, particularly those who have less trust and confidence in the police, with fairness and respect. For example, the force last conducted a public survey in November 2015. This was a joint survey with the City of London Corporation and focused on general policing issues and did not deal specifically with the issue of treatment.

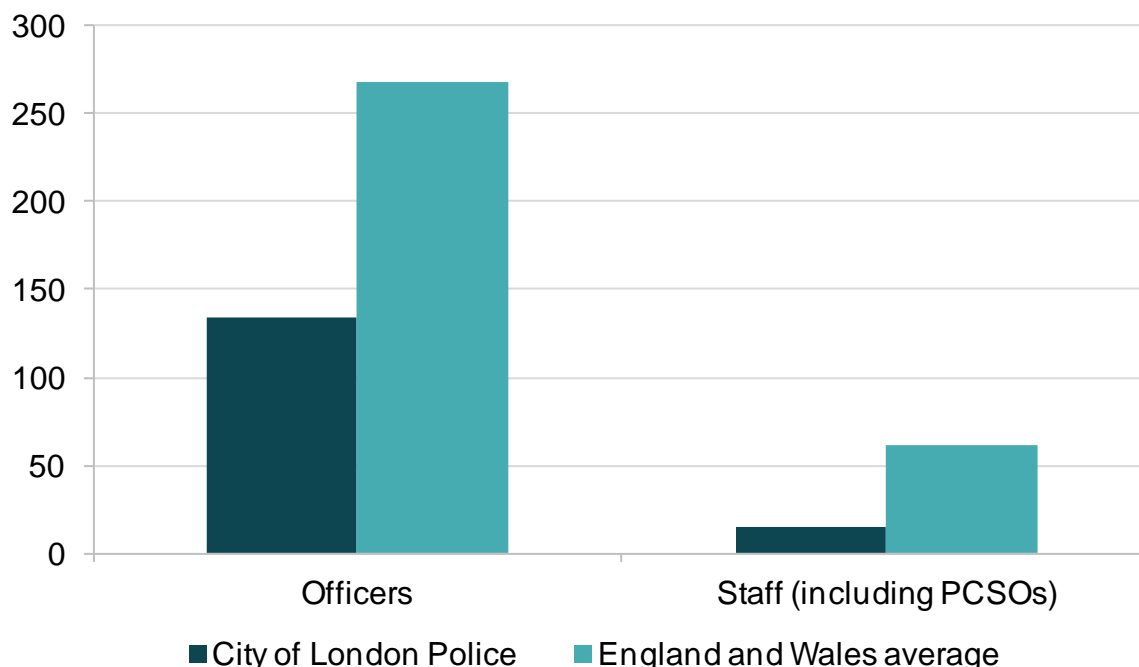
### **Identifying and understanding the issues**

The force's public survey is one method that the force used to examine whether its priorities are in line with the concerns of the people it serves. There is good engagement with young people through youth partnerships, schools and school fora. For example, the force has formed two focus groups with young people from the local community to gain feedback about the force's website and professional standards investigations. The feedback from the groups has led to changes to the force's website and meant that PSD staff received unconscious bias training.

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 City of London Police compared with England and Wales, in the 12 months to 31 March 2016**



**Source: HMIC Legitimacy data collection**

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

In the 12 months to 31 March 2016, City of London Police recorded 134 public complaint cases per 1,000 officers, which was lower than the England and Wales average of 268 cases per 1,000 officers. During this period, the force recorded 14 public complaint cases per 1,000 staff (including PCSOs), which was lower than 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 types of complaint most frequently recorded by City of London Police are 'operational management decisions' and 'general policing standards'.<sup>8</sup> It is important to note, however, an issue identified during our 2014 police integrity and corruption inspection;<sup>9</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

<sup>8</sup> Independent Police Complaints Commission data is available at: [www.ipcc.gov.uk/reports/statistics/police-complaints/police-performance-data](http://www.ipcc.gov.uk/reports/statistics/police-complaints/police-performance-data)

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

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.

The force has responded positively to recommendations contained within the 2015 HMIC legitimacy inspection and uses external scrutiny in the form of the City of London Police Committee,<sup>10</sup> which acts as the force's police and crime commissioner.

The committee has a number of sub-groups including the professional standards and integrity sub-committee. This group provides external oversight of all aspects of professional standards performance such as numbers and types of complaint; the committee is also provided with detailed reports of individual complaints. In addition, the force has an internal professional standards and integrity board chaired by the assistant commissioner.

In August 2014, following HMIC's 2013 inspection on the effective and fair use of stop and search powers,<sup>11</sup> the Home Office published guidance to police forces on how to implement the Best Use of Stop and Search (BUSS) scheme.<sup>12</sup> 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<sup>13</sup> considered the extent to which the force was complying with the scheme and found that it did not comply with all features of the scheme. In autumn 2016, HMIC will re-assess the force's compliance with those features of the scheme that it was not complying with in 2015. We will publish our findings in early 2017.

---

<sup>10</sup> The Court of Common Council is the police authority for the City of London police area as set out in section 101(1) of the Police Act 1996, available from: [www.legislation.gov.uk/ukpga/1996/16/section/101](http://www.legislation.gov.uk/ukpga/1996/16/section/101)

<sup>11</sup> *Stop and Search Powers – are the police using them effectively and fairly?* HMIC, July 2013. Available from: [www.justiceinspectorates.gov.uk/hmic/publications/stop-and-search-powers-20130709/](http://www.justiceinspectorates.gov.uk/hmic/publications/stop-and-search-powers-20130709/)

<sup>12</sup> Best Use of Stop and Search Scheme, Home Office, August 2014 [www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/346922/Best\\_Use\\_of\\_Stop\\_and\\_Search\\_Scheme\\_v3.0\\_v2.pdf](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/346922/Best_Use_of_Stop_and_Search_Scheme_v3.0_v2.pdf)

<sup>13</sup> *PEEL: Police legitimacy 2015 – A national overview*, HMIC, February 2016. Available at: [www.justiceinspectorates.gov.uk/hmic/publications/police-legitimacy-2015/](http://www.justiceinspectorates.gov.uk/hmic/publications/police-legitimacy-2015/)

## **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**

The assistant commissioner chairs the force's professional standards and integrity board, and also its organisational learning forum. The forum enables the force to assess and respond to positive and negative feedback from a variety of sources. For example, public complaint data for the force is presented to meetings, as are any lessons learned from misconduct cases. Information about feedback and misconduct cases is then disseminated across the force by a variety of methods. These can include personal intervention by individual directorate leads or department heads. For example, the actions of a directorate lead following a misconduct case where an officer's behaviour had fallen well short of the force's expectations. The directorate lead recognised the need to ensure that the workforce were aware of the force's response to the incident, and addressed them personally, reinforcing the force's expectations and the requirements of the Code of Ethics.

The City of London Police engages effectively with the public and responds well to their feedback. The force has a good understanding of community concerns and works well to respond to them. For example, Project Servator is an initiative which was launched by the City of London Police, but which is now being used by other police forces. It uses specially-trained officers to detect and deter those who visit areas while preparing to commit crimes. It is centred on the use of police stop and search powers. However, the force recognises that the use of these powers can be viewed, by some parts of the community, as oppressive. In order to mitigate against this, it has developed comprehensive public engagement tactics, which are used whenever Project Servator is deployed. In addition, the force works closely with local community groups, including young adults and the independent advisory group, for specific feedback.

### **Demonstrating effectiveness**

The force is generally proactive in its use of social media. It has more than 60,000 followers on Twitter. However, we were told that this communication was often 'one way' and that the force's corporate communications department was not engaged routinely in publicising how the force had responded to public concerns. As a result, the force could do more to demonstrate that it is acting on the feedback that it receives. For instance, examination of the force's internet site reveals that there is no



facility for the force to inform the public about how it has responded to comments or criticism that it has received. We were told that this is considered to be the role of individual community officers.

We understand that the force is currently reviewing its communications strategy. In doing so, the force needs to consider how it ensures that all its communities are aware of how it responds to feedback and challenge generally and, where appropriate it has taken action in specific cases.

## Summary of findings



**Good**

City of London Police is good at treating all the people it serves with fairness and respect, and it has a good understanding of why it is important to do so.

The force has gone to significant lengths to ensure that the Code of Ethics is effectively incorporated into its policies and practice. It is also clear that City of London Police's officers and staff have a good knowledge of the code and its requirements.

The force engages with its communities well, in order to identify those problems that have the greatest impact on the perception of fair and respectful treatment. This includes the use of social media to engage with local residents and the business community.

However, the force could do more to develop its understanding of the issues that have the greatest impact on public perceptions of fair and respectful treatment. And, it could also do more to demonstrate to the public that it has acted on feedback.

### Areas for improvement

- The force should improve how it demonstrates that it has taken action to improve how it treats all the people it serves.

## 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. 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.

### Initial vetting

The force's vetting policy is comprehensive and complies with national vetting guidance. The force vets applicants to ensure that it recruits officers, staff and volunteers who have high standards of ethical behaviour. The vetting department is incorporated within the professional standards department, and this means that intelligence can be shared effectively.

---

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

<sup>15</sup> *Promoting ethical behaviour and preventing wrongdoing in organisations*, College of Policing, 2015. Available at:  
[http://whatworks.college.police.uk/Research/Documents/150317\\_Integrity\\_REA\\_FINAL\\_REPORT.pdf](http://whatworks.college.police.uk/Research/Documents/150317_Integrity_REA_FINAL_REPORT.pdf)

The force's policy is that every person who joins the organisation is vetted. This includes all new recruits and staff members, people joining from other forces, and volunteers. As the force does not monitor the ethnicity or UK national status of the applicants who fail vetting checks, it cannot demonstrate that it understands the extent to which the vetting process may affect recruitment of a diverse workforce.

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**

The force clarifies and continues to reinforce what are acceptable and unacceptable standards of behaviour. It does this regularly, and uses a variety of methods. This includes the use of the force intranet where information about the Code of Ethics is both visible and accessible. Applicants for promotion or lateral development must provide evidence of how they have responded personally to the requirements of the code. The PSD is also proactive in bringing the code to the attention of all staff. The force ensures that the outcomes of all misconduct hearings are published on both the force intranet and the public website.

HMIC found effective training in relation to the Code of Ethics was being provided to all officers and staff. In addition, the force is proactive in increasing awareness of the policy on notifiable associations and business interests and this includes monitoring those who are refused applications to ensure compliance with the policy.

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

HMIC's 2014 police integrity and corruption inspection emphasised the need for forces to make arrangements for continuous monitoring of their ethical health, through active monitoring of force systems and processes to spot risks to their integrity, including – but not limited to – business interests, gifts and hospitality, and public complaints.<sup>16</sup> These findings reflect the research commissioned by the College of Policing, which highlights the importance of taking a problem-solving approach to preventing wrongdoing, by scanning and analysing police data to identify particular officers or hotspots for targeting prevention activity.

---

<sup>16</sup> *Integrity matters*, HMIC, January 2015. Available from: [www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/](http://www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/)

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**

HMIC found that the force has considered the National Crime Agency's (NCA) counter-corruption strategy to help it form its own strategy. Within the strategy it has clustered a number of objectives under the headings of prepare, prevent, pursue, and protect. However, we found that the objectives are generic in nature. A more specific counter-corruption strategy which identifies risks to the integrity of the force based on local information is currently being developed by the force. Until that strategy is developed this remains an area for improvement for the force.

The HMIC 2014 Police Integrity and Corruption inspection<sup>17</sup> for City of London Police contained four recommendations. Two of these related to clarification to staff about which of code of conduct had precedence; and the creation of a gifts and hospitality policy. The force has responded positively to each of these recommendations. The force has issued advice to the workforce about the primacy of Code of Ethics and there is now a gifts and hospitality procedure in place. An established application process for business interests, including monitoring those applications that are refused, is in place. This process also ensures that an annual business interest review takes place. However, we have some concern that the reminder, which is issued by the PSD, is provided directly to the individual, and so by-passes the individual's immediate line manager.

Since the HMIC 2014 report, the force has developed its counter-corruption capability and regularly examines individual and organisational risks. The assistant commissioner has initiated a series of thematic risk reviews which focus on, among other things, the use of police vehicles and hire cars, mobile phones, and the use of corporate credit cards. This is a positive development. In addition, the PSD has a process by which it can trawl proactively open websites. In doing so, it seeks to identify individuals who identify themselves as City of London Police employees (both officers and staff) on, for example, social network sites. These individuals are then provided with one-to-one feedback about the risks at which they are placing themselves, family members and friends. The force has also provided social network guidance to all staff.

---

<sup>17</sup> *Police Integrity and Corruption - City of London Police*, HMIC, November 2014, page 25. Available at: [www.justiceinspectorates.gov.uk/hmic/publications/police-integrity-corruption-force/](http://www.justiceinspectorates.gov.uk/hmic/publications/police-integrity-corruption-force/)

The force is able to audit the use of the organisation's databases, for example to establish when staff have searched force databases, looking for vulnerable victims. The force has purchased software which would allow it to conduct live-time monitoring. We understand that this has not been installed due to heavy demand on the organisation's information technology support department. This is disappointing, as until this capability is made available, the force is restricted in relation to the proactive methods available to it to identify potential corruption within the force.

HMIC found that the force's vetting department is good at reviewing and conducting 'vetting aftercare' (i.e. periodic reviews of individual vetting, irrespective of the individual's career path) or post-employment checks. This includes reviews following any change in personal circumstances, and also vetting health-checks if a member of staff changes role. This includes postings to roles that are considered high-risk or on promotion.

In addition, the force's internal professional standards and integrity board, provides direction and oversight of integrity matters and auditing within the force. Additional scrutiny is provided by the integrity standards sub-committee of the City of London Police Committee.

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

The force has effective methods to intervene early to manage risks to its integrity. The PSD has access to a 'subject intervention matrix' which enables the department to analyse many sources of information, such as complaints, sickness, and intelligence, overtime claimed and rest day usage. Also, the force has used the system to identify officers who are suspected of abusing their authority for sexual gain.

The department also works hard to intervene early to deal with problems which arise from complaints, by having monthly meetings with other department or directorate leads. These meetings allow emerging trends about a specific officer or team to be highlighted and discussed.

This interaction enables the force to intervene rapidly when concerns are raised about an officer. If problems are identified, they are brought to the attention of the officer's line manager and a plan is put in place to deal with the problems. In addition to these meetings, the force demonstrated that it is able to share learning and lessons learned from public bodies such as the IPCC; professional standards investigations and other sources such as academic papers. These processes included the force organisational learning forum and targeted publicity campaigns through the force intranet system such as publicity about the inappropriate use of social networks.

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

The force has confidential reporting systems which are embedded in everyday policies and practice. It has a professional standards e-mail system and a confidential reporting system, Safecall, which is heavily promoted across the force intranet and website.<sup>18</sup> Staff are well aware of the system, and they said that they would be confident in using it. However, HMIC found that the system has limitations as there is restricted ability to re-contact the complainant or the informant who made the original call. HMIC was pleased to learn that this was being dealt with by the introduction of the 'bad apple' system which will allow greater contact with a complainant and enables the force to clarify specific issues such as the date or location of an incident or specific details such as the exact nature of an individual's conduct.

The force's counter-corruption unit (CCU) is effective at assessing intelligence about potential corruption once it has been identified. It is able to use appropriate analytical tools and covert techniques to enable it to develop intelligence. It supports counter-corruption investigations by development of, for example, subject profiles. This ensures that investigating officers, and the staff who provide strategic governance, are well placed to make effective tactical decisions.

The force has put in place processes to ensure that those reporting corruption are supported by the organisation. For example, members of staff who make complaints are provided with a document which outlines the minimum level of support that they can expect. The force assesses, develops and deals with corruption-related intelligence in a timely and professional manner within its CCU. The force has the ability to undertake random drug testing. In addition, the PSD is able to conduct intelligence-led drug testing (but it has not needed to do this since 2015). A policy on drug testing is available to all staff on the intranet.

## **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>19</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

---

<sup>18</sup> Safecall is a confidential, comprehensive, 24-hour crisis referral service for all public safety employees, all emergency services personnel and their family members nationwide.

<sup>19</sup> *The abuse of police powers to perpetrate sexual violence*, jointly published by IPCC and ACPO (now the National Police Chiefs' Council), September 2012. Available at: [www.ipcc.gov.uk/sites/default/files/Documents/research\\_stats/abuse\\_of\\_police\\_powers\\_to\\_perpetrate\\_sexual\\_violence.PDF](http://www.ipcc.gov.uk/sites/default/files/Documents/research_stats/abuse_of_police_powers_to_perpetrate_sexual_violence.PDF)

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>20</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”.

The most recent national counter-corruption assessment, in 2013, highlighted corruption for the purposes of sexual gratification as a major threat to law enforcement.<sup>21</sup> HMIC's 2015 report *Integrity matters*<sup>22</sup> identified police sexual misconduct as an area of great concern to the public. We share the public's disquiet and so we looked at this problem 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 force is at the early stages of understanding the seriousness of abuse of authority for sexual gain; it can demonstrate this when it has responded effectively to intelligence relating to this problem. However, although the force now includes the issue in training for new recruits and Special constables, it has not undertaken any significant activity to raise awareness among the wider workforce. As a consequence, we found limited understanding of the issue among the officers and staff we spoke to (with some stating that they had not received any information from the force regarding the problem). However, HMIC was pleased to observe that supervisors, officers and staff all demonstrated a common-sense approach to recognising pre-cursors for this type of behaviour and how they would respond

---

<sup>20</sup> Code of Ethics – A Code of Practice for the Principles and Standards of Professional Behaviour for the Policing Profession of England and Wales, College of Policing, London, July 2014. Available at: [www.college.police.uk/What-we-do/Ethics/Documents/Code\\_of\\_Ethics.pdf](http://www.college.police.uk/What-we-do/Ethics/Documents/Code_of_Ethics.pdf)

<sup>21</sup> Every three years, the National Counter-corruption Advisory Group commissions a strategic assessment of the threat to law enforcement from corruption. The most recent assessment was completed in June 2013 by the Serious Organised Crime Agency. The assessment was based upon three years of intelligence reports on possible corruption gathered by forces in England and Wales, supplemented by information from other forces and national agencies.

<sup>22</sup> *Integrity matters*, HMIC, January 2015. Available from: [www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/](http://www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/)

In addition, the force does not formally recognise abuse of authority for sexual gain as serious corruption within its anti-corruption control strategy. However, the force recognises the seriousness of the problem and deals with it commensurately. For instance, the force has appropriately referred cases that could be considered to fall into this category to the IPCC.

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

The PSD has access to a 'subject intervention matrix' which enables the department to analyse many sources of information; it has used the system to identify officers who are suspected of abusing their authority for sexual gain.

However, HMIC did not find any evidence to suggest that the force was taking active steps to gather intelligence on members of the workforce who are developing, or at risk of developing, inappropriate relationships with victims of domestic abuse. For example, at the time of the inspection the force was not collecting intelligence from women's refuges or proactively monitoring the use of force computers. The force has some capability to monitor the use of the organisation's databases, for example searches for vulnerable victims. However, at the time of the inspection this was completed manually. This is disappointing as the force has bought software which would allow the force to conduct live-time monitoring. We understand that this has not been installed due to heavy demand on the organisation's information technology support department.

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

The force publicises the result of misconduct proceedings and lessons learned through the force intranet. The force has included the abuse of authority for sexual gain in training provided to new recruits. However, as we have previously stated we found little evidence of specific guidance being provided to existing officers and staff in relation to abuse of authority for sexual gain.

### **Rebuilding public trust**

The force recognises the impact on public trust and confidence of high-profile misconduct and uses its website and press articles to publish details about the misconduct to rebuild trust and confidence with its communities. When necessary, it develops a media and engagement strategy aimed at informing and reassuring its communities and, if applicable, encouraging other witnesses to come forward.



## **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>23</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. Also, we looked at how aware the workforce is of these outcomes.

### **Working with the public**

The force website publishes the details of forthcoming misconduct hearings, and information on how to apply to and attend the hearings. This information is clear and easily accessible. In addition, the force also publishes details of misconduct cases on its website. It provides details of the nature of the allegation; the outcomes; and, in some cases, the name of the officer involved.

The force has developed good links with its independent advisory group where such issues are discussed. In addition, the police committee's integrity and standards sub-committee is provided with extremely detailed reports on all resolved complaints and misconduct allegations. The board provides further transparency and reassurance. This means that the force is able to inform the public about how it deals effectively with matters of integrity and corruption and has provided details of disapproved officers to the College of Policing.

The force recognises the impact of high-profile officer or staff misconduct on public trust and confidence and uses its website and press articles to publish details about the misconduct to rebuild trust and confidence with its communities. The force has the capability to publish details of chief officers' gifts and hospitality on its website. However, at the time of our inspection, information was limited to expenses claimed by chief officers.

---

<sup>23</sup> *Literature review – Police integrity and corruption*, HMIC, January 2015. Available at: [www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/](http://www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/)

## Working with the workforce

The HMIC 2014 Police Integrity and Corruption inspection<sup>24</sup> for the City of London Police contained a recommendation that the force “should publish to all staff the outcomes of misconduct hearings”. The force has complied fully with that recommendation and is therefore good at engaging with its workforce about the outcomes of misconduct and corruption cases. The outcomes of misconduct investigations for officers are published internally as a news item on the front page of the intranet for all staff to see. The force also promulgates lessons learned through the organisational learning forum to its entire staff. Professional standards training is provided to a range of staff including discussion of outcomes from misconduct hearings. This reinforces good standards of behaviour to all staff and acts as a deterrent.

## Summary of findings



**Good**

The force has developed and maintained an ethical culture by deploying an effective vetting policy and process which it applies to all staff. The force regularly clarifies and reinforces standards of acceptable and unacceptable behaviour by a variety of methods which are recognised by its workforce. City of London Police identifies threats to its integrity effectively by robust and frequent monitoring of its staff compliance with policies such as notification of business interest policy. However, the force needs to develop its counter-corruption strategy to meet the needs of the force.

The force is good at informing the public and its staff of the outcomes of misconduct cases. However, the force needs to develop its approach to identifying staff who seek to abuse their authority for sexual gain. The first step in doing so would be to recognise it as serious corruption within its anti-corruption control strategy and, it must ensure that all staff have a good understanding of the issue.

---

<sup>24</sup> *Police Integrity and Corruption – City of London Police*, HMIC, November 2014, page 25. Available at: [www.justiceinspectorates.gov.uk/hmic/publications/police-integrity-corruption-force/](http://www.justiceinspectorates.gov.uk/hmic/publications/police-integrity-corruption-force/)

### **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 to its workforce, 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.<sup>25</sup> As such, this concept of 'organisational justice', and its potential impact on 'procedural justice' forms an important part of HMIC's assessment of police legitimacy. As there is no comparative data on how fairly officers and staff perceive forces to have treated them, we focused our assessment on how well forces identify these perceptions within their workforces and act on these findings. In particular, we looked at the extent to which organisational 'fairness' is reflected through the way individual performance is managed, and how 'organisational respect' is reflected through how forces provide for the wellbeing of their workforces, particularly through preventative and early action.

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

Research suggests that forces that involve officers and staff in decision-making processes, listen to their concerns, act on them, and are open about how and why decisions were reached, may improve workforce perceptions of fair and respectful treatment.<sup>26</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.

---

<sup>25</sup> *Fair cop 2: Organisational justice, behaviour and ethical policing*, College of Policing, 2015.

Available at:

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

<sup>26</sup> *Fair cop 2: Organisational justice, behaviour and ethical policing*, College of Policing, 2015, page 11. Available at:

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

## Identifying and understanding the issues

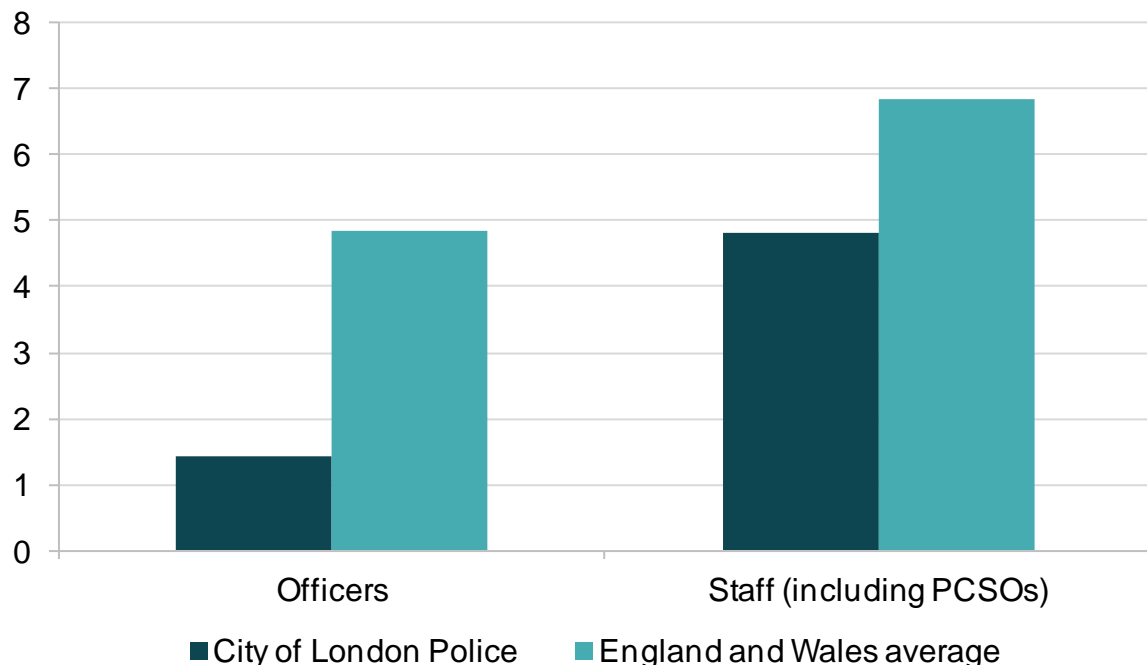
City of London Police uses a range of methods to identify the areas that have the greatest impact on workforce perceptions of fair and respectful treatment.

The force has allowed the workforce to provide feedback to the senior leadership team. For example, the assistant commissioner (AC) holds regular online question and answer sessions for all staff. These 'Ask the AC' events are open to all staff and to encourage participation individuals can, if they wish, remain anonymous. This initiative was well received by the people we spoke to during the inspection.

The force monitors relevant force data such as workforce diversity, complaints and misconduct and grievances. Also, it facilitates exit interviews for those staff who are leaving. It does this because it recognises that this may provide useful information on how the organisation is perceived by staff. In addition, the grievance procedures for officers and staff are published on the force intranet and internet sites.

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 matters 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 City of London Police finalised compared with England and Wales, in the 12 months to 31 March 2016**



Source: HMIC Legitimacy data collection

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

In the 12 months to 31 March 2016, City of London Police finalised 1.4 formal grievances raised by officers per 1,000 officers, which was lower than the England and Wales average of 4.8 per 1,000 officers. During this period, the force finalised 4.8 formal grievances raised by staff per 1,000 staff (including PCSOs), which was broadly in line with the England and Wales average of 6.8 per 1,000 staff (including PCSOs).

The force has, in the past, used staff surveys to improve its knowledge of the workforce perceptions of the way that the force is led. However, the most recent of these was as long ago as 2014 and, we were told that the force felt that the process was of limited value and that it considered that it provided little insight. This view was echoed by officers and staff who stated that they had not been aware of any response by the force. More recently the force has used 'sensing surveys' which are intended to develop the force's understanding of the sense of empowerment within the workforce. However, the use of this technique is relatively new and the force was only able to provide limited evidence of how effective it had been in developing the force's understanding of the specific issues. As a consequence, the force has some understanding of the areas that effect the workforce's perceptions of fair and respectful treatment.

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

The force responds to staff concerns. For example, following the 2014 staff survey the force recognised the general disaffection and suspicion regarding the promotion processes. In response, the force undertook a series of staff focus groups and consultation exercises and now encourages the involvement of staff associations in promotion boards. In addition, the force has an impressive staff suggestion scheme referred to as 'Innovate' which, not only encourages staff to submit ideas but, provides regular feedback to those who have made suggestions, and to the workforce as a whole. The force has linked the innovation scheme to the development of leadership by allowing those who have suggested changes to become part of the implementation team. While these are welcome initiatives, we were told by a number of officers, including those at a senior level, that the force could do more to demonstrate how they had responded to staff concerns.

By way of illustration, staff networks are an effective means of understanding the feelings and perceptions of staff. They raised concerns that they were not valued by the force and not involved sufficiently in the development and implementation of force policies.

## **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**

The force launched its wellbeing strategy in April 2016. The strategy is a joint initiative with the City of London Corporation<sup>27</sup> and is both up-to-date and proactive in nature. The strategy explicitly sets out the organisation's recognition of the values of workforce wellbeing and takes cognisance of good practice such as that published by National Institute for Health and Care Excellence and the World Health Organisation. The force has also recently launched its health and wellbeing network which was a product of the force innovation scheme. The network is fully supported by chief officers including the commissioner who attended a high profile launch. The network is administered by volunteers from within the force and uses the force intranet to publicise available resources to the organisation's workforce.

The scheme is a laudable development; however, we found a level of confusion among the workforce about the force's commitment to wellbeing. Also, we found a lack of knowledge about who was responsible for wellbeing within the force. This is unfortunate and may be a result of the proximity of HMIC's inspection to the recent launch, or confusion on the part of the workforce as to the role of the City Corporation and their ability to access wellbeing resources beyond occupational health.

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

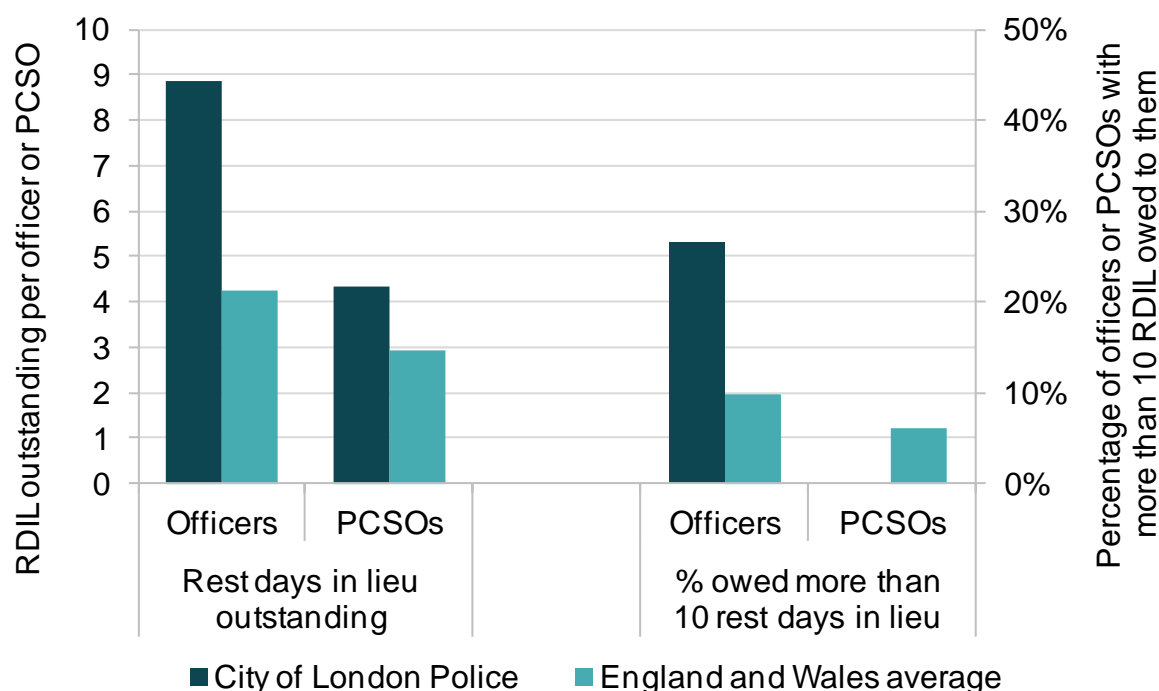
The force collates information relating to sickness levels, caseloads and working excessive overtime. This is discussed at monthly directorate meetings and force level performance management meetings where directorate heads are held to account for performance. However, immediate line managers are often unaware of welfare indicators or emerging issues unless they maintain their own records on individuals.

---

<sup>27</sup> The City of London Corporation is the municipal governing body for the City of London.

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

**Figure 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 City of London Police compared with England and Wales, as at 31 March 2016**



**Source: HMIC Legitimacy data collection**

**Note: For some police forces' data about the number of rest days in lieu outstanding are estimated from data on hours owed. For further information about the data in figure 4 please see annex A.**

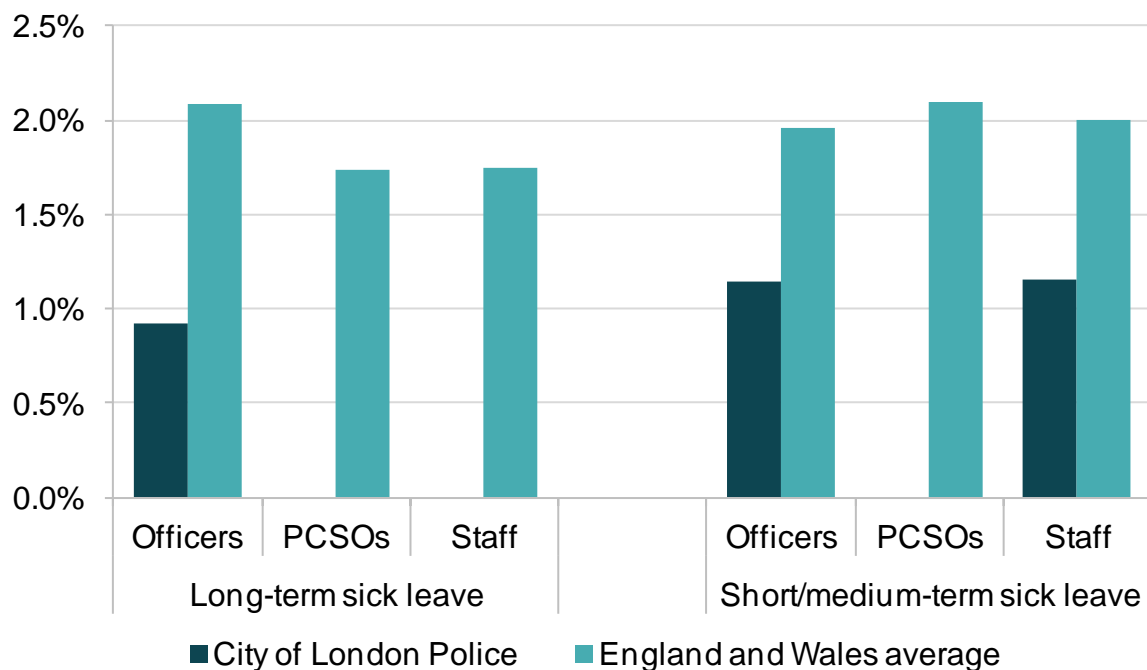
As at 31 March 2016, there were 8.9 rest days in lieu outstanding per officer in City of London Police, which was higher than the England and Wales average of 4.2 days per officer. On the same date, there were 4.3 rest days in lieu outstanding per PCSO in the force, which was broadly in line with the England and Wales average of 2.9 days per PCSO. As at 31 March 2016, 26.5 percent of officers in City of London Police had more than 10 rest days in lieu owed to them, which was higher than the England and Wales average of 9.8 percent. We have not provided the percentage of PCSOs in City of London Police with more than 10 rest days in lieu owed to them as at 31 March 2016 because the total number of PCSOs in the force was very low. The England and Wales average was 6.0 percent of PCSOs.



This is a concern as wellbeing identification training is not provided to line managers currently. HMIC was told that force is looking to address this in the “next six to twelve months”. This means that, not only are line managers not provided with appropriate training to identify and deal with wellbeing issues, they are also deprived of the tools by which they could recognise early indicators.

Sickness data can provide a useful point of comparison for assessing the wellbeing of police workforces. Analysis of this data can also help forces to identify and to 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 City of London Police compared with England and Wales, as at 31 March 2016**



**Source: Home Office Annual Data Requirement**

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

- 0.9 percent of officers were on long-term sick leave, which is lower than the England and Wales average of 2.1 percent;
- 1.1 percent of officers were on short or medium-term sick leave, which is lower than the England and Wales average of 2.0 percent;

- We have not provided the percentage of PCSOs in City of London Police on long-term or short or medium-term sick leave as at 31 March 2016 because the total number of PCSOs in the force was very low;
- 0.0 percent of staff were on long-term sick leave, which is lower than the England and Wales average of 1.7 percent; and
- 1.2 percent of staff were on short or medium-term sick leave, which is lower than the England and Wales average of 2.0 percent.

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

The force has responded to the wellbeing needs of the force, but more could be done. The implementation of the wellbeing strategy and the staff network are welcome developments. This has resulted in some practical interventions. For example, staff commented favourably on healthy living presentations in staff canteens. The force intranet site provides good examples of staff being directed towards useful advice about wellbeing. We found that while staff were generally aware of the network, mainly because of its high-profile launch, few were fully aware of its role or the services open to them. There was also some confusion as to the role of the network. Some people believed that its function was to monitor force welfare.

The force is taking adequate action to improve the wellbeing of its workforce in stressful jobs. Officers in high risk roles such as firearms officers, child safeguarding officers and sex offender managers have a mandatory referral for stress counselling. In addition, the force makes counselling available to all officers who have dealt with traumatic incidents. HMIC was pleased to note that this service was extended to members of the Special constabulary as a matter of course.

### **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>28</sup> HMIC assessed how fairly and effectively the force manages the

---

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

Available at:

[http://whatworks.college.police.uk/Research/Documents/150317\\_Fair\\_cop%20FINAL\\_REPORT.pdf](http://whatworks.college.police.uk/Research/Documents/150317_Fair_cop%20FINAL_REPORT.pdf)

individual performance of its officers and staff, including the extent to which the process aligns with guidance produced by the College of Policing.<sup>29</sup>

### **The performance assessment process**

The force has invested a great deal of time reviewing the policy for its personal development review (PDR) process, and re-launching it. At the time of our inspection, the process remained paper-based. Forms could be downloaded from the force intranet, and completed by both the reviewer and reviewee. The policy also gives guidance on how often reviews should take place. It was recommended that there should be at least two formal discussions. The force has a formal moderation process for police staff in accordance with City of London Corporation procedures. However, this does not apply to police officers. The policy suggests that senior police managers are given a summary of a team's development needs and then review completed forms for consistency. This is not mandatory.

In the absence of a system that has the capacity for centralised oversight, the process has limited opportunities for the kind of quality assurance that would ensure that all staff were treated fairly.

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

The force's 2014 staff survey identified that less than 10 percent of those that took part in the survey valued the PDR process. The percentage of respondents that stated that they did not value the process was 86.7 percent.

The force has responded to this but, during the course of our inspection, we found the level of dissatisfaction with the process remained high.

We spoke to members of the workforce of all ranks and roles. Almost all of them said that they had little confidence in the process. All too often, performance review was treated as a 'tick-box exercise'. The force has put some effective processes in place to reward good work, such as the force awards scheme. However, opportunities for the review to assist proactively with an individual's development were considered to be limited. For example there was no obvious link between the process and any talent-spotting arrangements that the force has in place. In addition, members of the workforce were not confident that the process was effectively used to challenge poor performance.

The fact that the process remains paper-based contributes to the level of frustration with the process. The current situation hinders the provision of mandatory intervention and oversight by senior managers. For example, we did not find any evidence that the force monitors the effectiveness and fairness of reviews in terms of

---

<sup>29</sup> College of Policing guidance on the police performance development review process is available at: [www.college.police.uk/What-we-do/Support/Reviewing-performance/Pages/PDR.aspx](http://www.college.police.uk/What-we-do/Support/Reviewing-performance/Pages/PDR.aspx)

ethnicity, gender, type of worker and rank. As a consequence, the force cannot demonstrate that its performance assessment process for officers and staff is currently fair and effective. Therefore, it is an area for improvement.

## Summary of findings



**Requires improvement**

The City of London Police uses a range of methods to identify the areas that have the greatest effect on its workforce's perceptions of fair and respectful treatment.

This includes opportunities for the staff to provide to provide direct feedback to the senior leadership team and an impressive 'innovate' scheme. In the past, the force has also used staff surveys and, more recently, 'sensing' surveys. However, the force could do more to demonstrate how it has responded to staff concerns.

The force launched its wellbeing strategy in April 2016. The strategy is a joint initiative with the City of London Corporation and is both up-to-date and proactive. The force has also recently launched its health and wellbeing network. The network has been fully supported by chief officers including the commissioner, who attended a high-profile launch. Both are welcome developments, but we found that staff were confused about the force's commitment to wellbeing. The force needs to do more to demonstrate that it understands the wellbeing needs of its workforce and responds to these needs.

The force has invested a considerable amount of time in reviewing its policy and re-launching its personal development review process. However, the process lacks central oversight and the force has some work to do before it can be confident that it can demonstrate that its performance assessment process for officers and staff is fair and effective.

### **Areas for improvement**

- The force should improve how it identifies and understands its workforce's wellbeing needs.
- The force should improve how it manages individual performance of its officers and staff.



## Next steps

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

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

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

## Annex A – About the data

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

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

### Methodology

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

#### Comparisons with England and Wales average figures

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

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

#### Statistical significance

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

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

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

#### Population

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

## Force in numbers

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

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

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

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

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

## Figures throughout the report

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

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

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



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

The Independent Police Complaints Commission (IPCC) defines a complaint for the purposes of recording as: “an expression of dissatisfaction by a member of the public with the service they have received from a police force. It may be about the conduct of one or more persons serving with the police and/or about the direction and control of a police force”. A police complaint can be about more than one officer or member of staff and can refer to one or more allegations.<sup>30</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.

---

<sup>30</sup> *Guidance on the recording of complaints under the Police Reform Act 2002*, Independent Police Complaints Commission. Available at: [www.ipcc.gov.uk/sites/default/files/Documents/statutoryguidance/guidance\\_on\\_recording\\_of\\_complaints\\_under\\_PRA\\_2002.pdf](http://www.ipcc.gov.uk/sites/default/files/Documents/statutoryguidance/guidance_on_recording_of_complaints_under_PRA_2002.pdf)

**Figure 4: 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](http://www.gov.uk/government/statistics/police-workforce-open-data-tables)