



Promoting improvements
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PEEL: Police legitimacy 2016

An inspection of Dyfed-Powys Police



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Introduction

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

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

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

To achieve this support – or 'consent' – the public needs to believe that the police will treat them with respect and make fair decisions (while taking the time to explain those decisions), as well as being friendly and approachable.¹ 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.² 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.

¹ *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

² *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

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/). This report sets out our findings for Dyfed-Powys Police.

Reports on Dyfed-Powys Police's efficiency and leadership inspections are available on the HMIC website (www.justiceinspectorates.gov.uk/hmic/peel-assessments/peel-2016/dyfed-powys/). Our reports on police effectiveness will be published in early 2017.

Force in numbers



Workforce

Total workforce as of 31 March 2016

1,868

Total workforce breakdown as of 31 March 2016

officers

1,149

staff

584

PCSOs

135



Ethnic diversity

Percentage of BAME in workforce 31 March 2016

overall workforce

0.7%

officers

0.8%

staff

0.7%

PCSOs

0.7%

Percentage of BAME in local population, 2011 Census

2.0%



Gender diversity

Percentage of females in overall workforce 31 March 2016

41%

England and Wales population, 2011 Census

51%

Percentage of females by role 31 March 2016

30%

Dyfed-Powys Police

officers

59%

staff

PCSOs

52%



Public complaints

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

Officers

Dyfed-Powys Police

212

England and Wales force average

268

Staff (including PCSOs)

38

61



Grievances

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

Officers

Dyfed-Powys Police

0.9

England and Wales force average

4.8

Staff (including PCSOs)

1.4

6.8



Victim satisfaction

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

Dyfed-Powys Police

93.2%

England and Wales force average

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 judgment³



Requires improvement

Dyfed-Powys Police has been assessed as requires improvement 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 require improvement in respect of legitimacy.

The force understands the importance of treating people with fairness and respect, but it needs to improve the way it seeks feedback and understands the issues that affect public perceptions of police treatment. The force needs to improve the extent to which it ensures that its workforce is behaving ethically and lawfully, particularly in relation to vetting, understanding corruption threats and tackling abuse of authority for sexual gain. The force seeks feedback from its workforce and values the benefits of workforce wellbeing, but needs to improve its understanding of workforce wellbeing needs and the way it manages individual performance.

Overall summary

Dyfed-Powys Police understands the importance of treating people with fairness and respect. The force's values are based on the Code of Ethics, and fairness and respect are intrinsic to the force's own vision and values. The force seeks feedback and challenge from the people it serves, but the focus needs to shift more towards understanding the issues that have the greatest impact on public perceptions of fairness and respect than is currently the case.

The force vets applicants to ensure that it recruits officers, staff and volunteers with high standards of ethical behaviour and regularly clarifies and reinforces what is considered to be acceptable and unacceptable behaviour. It has an understanding of threats to the integrity of the organisation and undertakes some assessment of potential corruption. However, it does not yet have a full understanding of the extent to which corruption is having an impact on the organisation, or the extent to which officers may be abusing their authority for sexual gain. Dyfed-Powys Police communicates with the public and its workforce about the outcomes of misconduct and corruption cases.

³ HMIC judgments are: outstanding, good, requires improvement and inadequate.

The force offers various ways in which officers and staff can express opinions of fair and respectful treatment but does not understand the areas that have the greatest impact on workforce perceptions. The force recognises that it now needs to be more proactive in involving the workforce in everyday activity designed to encourage fair and respectful treatment. Dyfed-Powys Police understands and values the benefits of workforce wellbeing and has several ways in which it can identify the needs and concerns of its workforce, including taking early and preventative action to improve workforce wellbeing. Dyfed-Powys Police does not have an established fair or effective performance assessment process for officers and staff.

Recommendations

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

Areas for improvement

- The force should improve how it seeks feedback from the people it serves about their experiences (or perceptions) of how the police have treated them.
- The force should improve how it identifies and understands the issues that have the greatest impact on public perceptions of fair and respectful treatment
- The force should ensure it complies with all aspects of the current national guidelines for vetting.
- The force should take immediate steps to introduce a policy for notifiable associations.
- The force should improve how corruption intelligence is assessed and graded.
- 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 establish and operate effective processes for identifying and managing individuals at risk of corruption.
- The force should improve how it identifies and understands the issues that have the greatest impact on workforce perceptions of treatment.
- The force should improve how it manages individual performance.

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

College of Policing research suggests that, in the eyes of the public, police legitimacy stems primarily from the concept of ‘procedural justice’: the expectation that officers will treat the public respectfully and make fair decisions (explaining them openly and clearly), while being consistently friendly and approachable.⁴

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.⁵ 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

Dyfed-Powys Police understands the importance of treating people with fairness and respect. The force’s vision is:

“Working together to provide a first class service that is visible and accessible, ensuring that the communities remain safe. We will be there when the public need us and we will act with fairness and respect in all that we do.”

⁴ *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

⁵ *Ibid.*

The force's values are based on the Code of Ethics, and fairness and respect are intrinsic to the force's vision and values. The Code of Ethics and the vision and values are well publicised and understood by all the workforce. The force has distributed an 'Expectations' document to all staff and has an in-force application process that directly tests a person's vision and values before selection for interview. The continuous professional development (CPD) days now focus on the Code of Ethics, the National Decision Model (NDM) and the force's mission, as well as its vision and values. This is a welcome improvement on HMIC's 2015 legitimacy report, where we considered that Dyfed-Powys Police had not done enough to develop an ethical culture or to incorporate the Code of Ethics into its policy or practice. The force's vision and values underline its commitment to ensuring that the people of Dyfed-Powys can expect to be treated with fairness and respect.

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 types of complaint most frequently recorded by Dyfed-Powys Police are 'other neglect or failure in duty' and 'oppressive conduct or harassment' and 'other assault'.⁶ It is important to note, however, an issue identified during our 2014 police integrity and corruption inspection;⁷ 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

Dyfed-Powys Police uses a variety of opportunities to seek feedback and challenge from the people it serves. However, this activity is largely designed to ascertain views around satisfaction rather than addressing the extent to which the force treats

⁶ Independent Police Complaints Commission data are available at:
www.ipcc.gov.uk/reports/statistics/police-complaints/police-performance-data

⁷ *Integrity matters*, HMIC, January 2015. Available from:
www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/

people with fairness and respect. For example, it conducts a quarterly victim satisfaction survey using an external research company. Satisfaction rates are currently in line with England and Wales average. The force also invites independent scrutiny. For example it has an independent advisory group (IAG), whose members are from diverse backgrounds. They include a representative from the travelling community and, until recently, a transgender member. The IAG is supported by the force's 'embracing diversity' group. The IAG also oversees the stop and search scrutiny panel. The force is fully compliant with the Best Use of Stop and Search (BUSS) scheme and encourages both 'ride along' and 'walk along' participation, where members of the public can observe and comment upon police engagement with the communities it serves.

Members of the public are also able to comment on detention arrangements via the independent custody visitors group. Independent custody visitors conduct unannounced visits to custody suites, and the group reports back to the office of the police and crime commissioner (OPCC). The OPCC works to gather the views of the public and regularly reports these back to Dyfed-Powys Police. This is done through a series of formal weekly and monthly meetings of the policing board and policing accountability board respectively. The police and crime commissioner and the chief constable attend both meetings and members of the public are invited to put questions to the chief constable.

The force also uses a residents' panel of 12 people who review complaints handling on a quarterly basis. The panel writes a report on dip-sampled cases and the force is required to respond. One of the panel's criticisms was the amount of jargon in letters sent out by the force. Letter and email templates were changed as a result, and are now easier to understand by members of the public.

The force's control strategy sets the priorities for neighbourhood teams when working with their communities and finding out the views of the public. A practical example of this is the good links the force has developed with a recently built local mosque, which has a dedicated police community support officer (PCSO) to undertake liaison work. Some of the rural communities can be harder for the force to engage with, sometimes because not all officers and staff speak Welsh. The force recognises the importance of this and is actively seeking to increase the numbers of staff who speak Welsh.

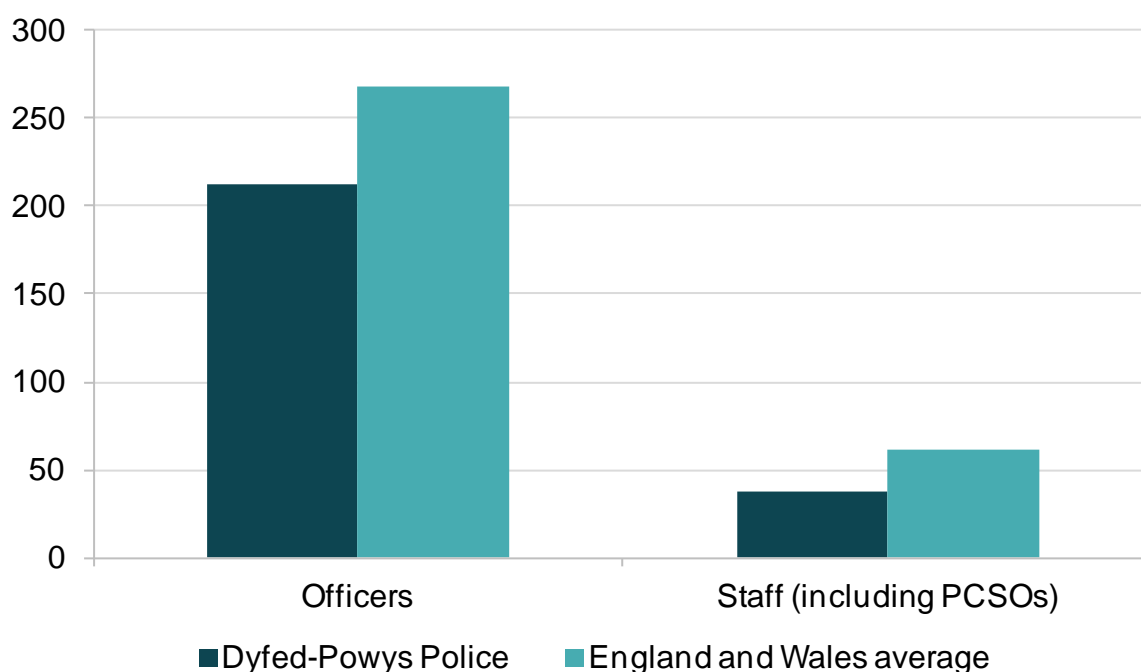
The force also undertakes neighbourhood surgeries ('Cuppa with a Coppa'), and regularly attends community events organised jointly with other agencies and local authorities. This has been effective in reducing demand, an example being where neighbourhood policing officers listened to the concerns of patients and staff at a local psychiatric hospital, which led to a reduction in the number of calls for assistance. This involvement was tailored appropriately to meet the needs of the local community. In addition, the force uses a range of social media, such as Twitter and Facebook, to encourage feedback. This approach means that the people of

Dyfed Powys can expect the police to consult and work with their communities at a local level, and to act favourably on the feedback received. The focus now needs to shift more towards understanding the issues that have the greatest impact on public perceptions of fairness and respect.

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



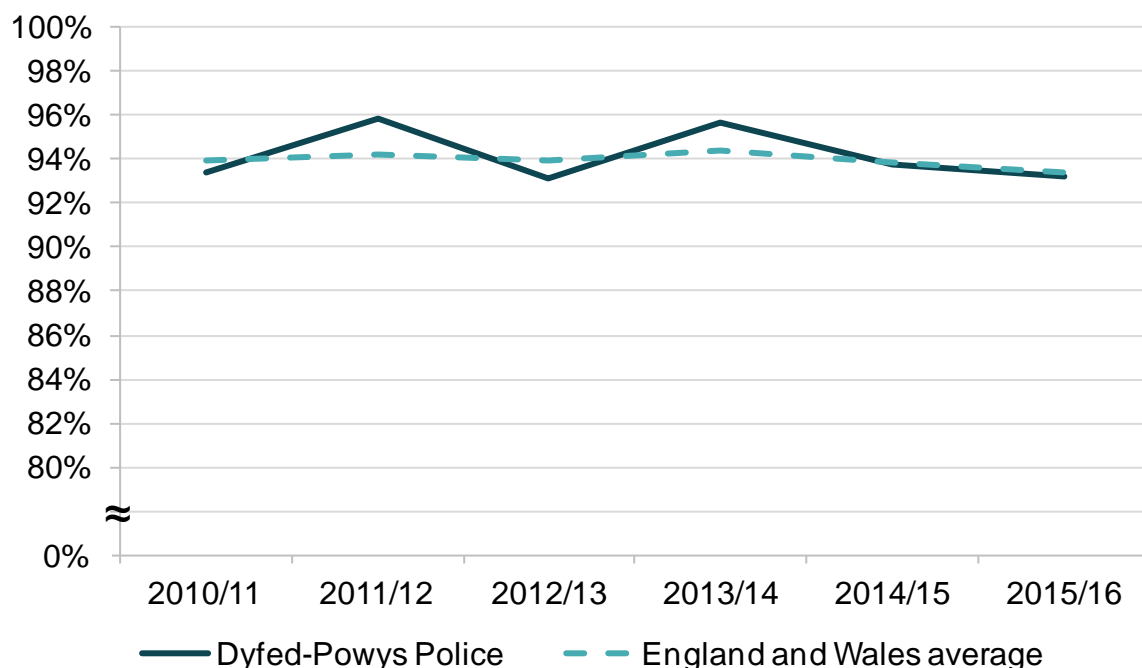
Source: HMIC Legitimacy data collection

For further information about the data in figure 1 please see annex A

In the 12 months to 31 March 2016, Dyfed-Powys Police recorded 212 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 38 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).

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

Figure 2: Percentage of victims satisfied with overall treatment by Dyfed-Powys 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 2 please see annex A

In the 12 months to 31 March 2016, 93.2 percent of all victims of crime (excluding hate crime) who responded to the victim satisfaction survey were satisfied with the overall treatment provided by Dyfed-Powys Police, which was broadly in line with the England and Wales average of 93.4 percent; and lower than the 93.8 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.

Dyfed-Powys Police takes seriously the perceptions of fairness and respect expressed by members of the public but has only a limited ability to identify and understand the issues involved. For example, the senior leaders explained to HMIC that the force was aware of negative perceptions about delays in investigating domestic violence cases. As a result, the force’s continuous improvement unit and the Crown Prosecution Service were looking at the reasons for such delays, to try to improve and speed up the service provided to victims.

Similarly, delays in resolving complaints were recognised by the force as a problem affecting the level of service to the public, an issue which had also been identified by the OPCC. The force has sought to improve this situation by increasing the number of staff working in its complaints handling department to reduce the number of outstanding complaints. Latest data from the Independent Police Complaints Commission (IPCC) show that in the second quarter of 2015/16 the recording of complaints within the time limit rose to 95 percent compared to 59 percent for the same period in the previous year. This is a considerable and welcome improvement.

However, the force does not yet have a communications strategy aimed at reaching communities that may have less confidence in the police. It recognises the need to address this and intends to develop such a strategy, but this depends on the results of a planned workforce survey. Without a communications strategy, it is not possible to act on the analysis of feedback from communities that are less likely to complain or take part in traditional forms of engagement. Therefore, the force has an incomplete picture of fairness and respect at an organisational level. For example Dyfed-Powys Police has a 'Rate your local police' online tool but this has not been used since October 2015. Furthermore, there was no analysis of the information received prior to this date better to understand the extent to which the force treats the people it serves with fairness and respect.

Dyfed-Powys Police is aware of the importance of understanding those issues that affect public perception and is taking some positive action to address this matter. For example, the force has established a victim's support working group to identify and understand better the factors that positively or negatively influence victims' experiences of the service. This includes how fairly and respectfully people feel they have been treated. This will help the force identify and understand the issues that have the greatest impact on public perceptions of fair and respectful treatment, but at present it is not undertaking enough analysis at an organisational level to draw any meaningful conclusions.

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

Dyfed-Powys Police acts on feedback and lessons learned in order to make improvements. For example, the force has a group named 'Learning the lessons' to ensure that it identifies necessary improvements. Senior leaders are represented, together with UNISON and the Police Federation. A 'lessons learned' message called 'Think B4 U Type' was promoted via the force's 'Bulletins' messaging service in response to public criticism about the language used when referring to members of the public. The language is now less official and more easily understood.

Another example involved an occasion where the press had obtained and released information which had caused unnecessary distress to a family. This had reflected badly on the force even though the matter was beyond its control. As a result, force family liaison officers were given instructions about how to prepare people for possible press intrusion.

The IAG gives advice on matters of equality and diversity. This advice is acted on to improve the way the force treats all the people it serves with fairness and respect. As a result of advice from the IAG, the force has introduced a non-emergency two-way text messaging service to help staff communicate with those who are deaf or hard of hearing.

Similarly, staff in the traffic department listened to comments from the public that 14 days to book a place on a speeding awareness course was too short a deadline. They passed this feedback on to the course providers to improve the service. The force has now extended the deadline to 28 days. These examples demonstrate that the force is acting on feedback from local communities to improve its service.

Demonstrating effectiveness

Dyfed-Powys Police works effectively with the public at a neighbourhood level, but could not demonstrate that it had undertaken analysis across the force to understand the effectiveness of this work. The force is undertaking innovative work which includes liaising with communities and acting on feedback from those who might have less trust and confidence in the police. For example, it holds regular meetings with church leaders in local communities. This was considered a good way of finding out what some of the real issues are within their communities. However, this process is not yet fully developed at an organisational level because there is no established communications strategy. Furthermore, we did not see evidence that any analysis had been undertaken to understand the effectiveness of local neighbourhood engagement, or that this process was joined up.

The force promotes 'Have your say' on its website but there is no obvious follow-up activity to indicate how 'having your say' influenced policing policy, or led to improvements. Similarly, the 'Rate your local police' online tool had not been used or updated since October 2015. The force has recently acquired a new management tool that should help it understand feedback better. Despite the lack of organisational oversight, the force is able to demonstrate, at a local level, a desire to serve its communities well, and to listen to and act on feedback received.

Summary of findings



Requires improvement

Dyfed-Powys Police requires improvement in the extent to which it treats all of the people it serves with fairness and respect. The force understands the importance of treating people with fairness and respect. Its values are based on the Code of Ethics, and the principles of fairness and respect are intrinsic to the force's vision and values. The Code of Ethics and the vision and values are well publicised and understood by the workforce, and we noted improvements in the way the force has disseminated the Code of Ethics, including incorporating it into the officer training and leadership development programmes. The force uses a variety of opportunities to seek feedback and challenge from the people it serves. However, its focus needs to shift towards understanding the issues that have the greatest impact on public perceptions of fairness and respect. The force takes seriously public perceptions of fairness and respect and it acts on feedback and lessons learned at a neighbourhood level. However, in the absence of a communications strategy, it cannot show that it has undertaken analysis across the whole organisation to understand the effectiveness of this engagement. Despite the lack of coordinated supervision, Dyfed-Powys Police is able to demonstrate at a local level a desire to serve its communities well, and to listen to and act on feedback received.

Areas for improvement

- The force should improve how it seeks feedback from the people it serves about their experiences (or perceptions) of how the police have treated them.
- 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.⁸ 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.⁹

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.¹⁰ 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.

⁸ *Integrity matters*, HMIC, January 2015. Available from:
www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/

⁹ *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

¹⁰ *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_REPORT.pdf and *Literature review – Police integrity and corruption*, HMIC, January 2015. Available at:
www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/

Initial vetting

Dyfed-Powys Police vets applicants to ensure that it recruits officers, staff and volunteers with high standards of ethical behaviour and complies with national vetting standards, as recommended in HMIC's 2014 inspection report on integrity and corruption.¹¹ The force vetting unit has done important work with new recruits over the last 20 months, and carries out recruitment vetting and counter-terrorism checks. In 2013, because the national police officer recruitment process did not test the applicant's values, the force introduced an in-force interview to test this directly against the Code of Ethics. The recruitment process records the protected characteristics of all applicants and the reasons for rejection. Some applicants have recently been unsuccessful because of comments on their Facebook pages that are not in line with force values, and where an inappropriate posting is considered to reflect poor decision making, the applicant is sifted out.

However, there is a considerable backlog, which is undermining the effectiveness of this screening process. We were advised by the force that there was a backlog of 150 vetting cases involving people about to join the force, people changing roles and external contractors who were waiting for their vetting to be completed. This backlog places extra pressures on the force. The force has recognised this as an issue and the vetting unit has reduced its caseloads for investigating officers accordingly. This will create greater capacity for the vetting process but there are still historic backlogs that need to be cleared, which mean that the force's ability to investigate serving officers is adversely affected. The force vetting policy does mean that the people joining Dyfed-Powys Police should have high standards of ethical behaviour, but more needs to be done to ensure that all applications are processed quickly.

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

Dyfed-Powys Police regularly clarifies and reinforces what it considers to be acceptable and unacceptable behaviour. This is an improvement on HMIC's 2015 legitimacy inspection,¹² in which we found that not enough was being done to create an ethical culture. For example, the professional standards department has its own

¹¹ *Integrity matters*, HMIC, January 2015. Available from: www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/

¹² *PEEL: Police legitimacy 2015 – An inspection of Dyfed-Powys Police*, HMIC, 2016. Available from: www.justiceinspectorates.gov.uk/hmic/publications/police-legitimacy-2015-dyfed-powys/

intranet page outlining its work and offering guidance to staff. Standards of behaviour, the Code of Ethics and NDM training are incorporated into various training packages, including the Initial Police Learning and Development Programme, police staff induction and the sergeants' leadership programme. Further training inputs regarding the Code of Ethics began during force training days in May 2016.

The force has a Code of Ethics committee, a stop and search scrutiny panel and an out-of-court scrutiny panel. These support and co-ordinate the force's response on ethical issues. The force does not have a communications strategy to support its understanding of ethical dilemmas but examples of dilemmas are provided by the professional standards department.

The force has recognised the increase in staff using social media, and staff receive regular emails and bulletins about acceptable and unacceptable use of Facebook to remind them of their responsibilities. The Code of Ethics has also been promoted in *The Informer*, the force's in-house magazine (available on the intranet).

Call-handlers in the force control centre were aware of where to find policies and guidelines, and explained to us the importance of using the Code of Ethics. They also described an increase in the promotion of the Code of Ethics during the last year, with regular reminders in briefings, posters and emails.

The force promotes the Code of Ethics to all its staff. Its intranet home page has an 'Our duty' tab with detailed guidance about the force's mission, vision, values and the Code of Ethics. There is also a link to a film which was made with the help of Dyfed-Powys Police officers to promote the national launch of the Code of Ethics, and is still available on the force's intranet.

Most senior leaders within the organisation understand the need to act, and to be seen to be acting, as good role models. We were satisfied that the force has made clear what is acceptable and unacceptable behaviour, and that this is understood by the vast majority of officers and staff.

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.¹³ These findings reflect the research commissioned by the

¹³ *Integrity matters*, HMIC, January 2015. Available from: www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/

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

Dyfed-Powys Police has some understanding of threats to the integrity of the organisation. It is represented at the regional counter-corruption action group either by the head of the anti-corruption unit or the detective inspector responsible for managing the unit. The group is represented at the national forum and it is through this structure that the police service better understands corruption risks at a national, regional and local level. Regular attendance is likely to result in a growing understanding of corruption risks and any developing themes. Intelligence is analysed in accordance with the National Crime Agency's counter-corruption codes. However, the force does not have a specific counter-corruption strategic threat assessment that is linked to the force's control strategy; rather it is working to a 12-month programme of principal risks which the anti-corruption unit monitors on a regular basis.

Dyfed-Powys Police has formalised processes in place for staff to declare their business interests and notifiable associations,¹⁴ as recommended in HMIC's 2014 police integrity and corruption inspection.¹⁵ These processes encourage staff to report such interests to either the professional standards department or the anti-corruption unit. The professional standards department has created an 'e-form' on which staff members record and submit details of their business interests. An annual review of the business interests register is undertaken by the anti-corruption unit and a dip sample of the interests allowed is completed to ensure that the conditions of the policy are kept (such as not using force systems to further an interest). Although the force does not have a specific policy in place for notifiable associations, a page on the professional standards department website explains what a notifiable association (known in the force as an 'inappropriate association') is and how to

¹⁴ 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.

¹⁵ *Police Integrity and Corruption – Dyfed-Powys Police*, HMIC, 2014. Available from: www.justiceinspectorates.gov.uk/hmic/publications/police-integrity-corruption-force/

report one to the anti-corruption unit. The guidance is comprehensive and easy to follow. At present, the force does not have electronic means for reporting notifiable associations but it intends to mirror the system for business interests later this year.

The anti-corruption unit has communicated with the workforce to ensure that notifiable associations are understood and an input is provided to training courses. It is acknowledged by the force that this is an area which requires improvement. The anti-corruption unit has met with IT colleagues to create an e-form which would mirror the system for business interests. Those who do submit a notifiable association form have them recorded on the vetting files and on the anti-corruption unit database. The force publishes all its chief officers' expenses on the website and in addition, lists any gifts and hospitality received. This practice complies with national guidelines, as recommended in HMIC's 2014 police integrity and corruption inspection¹⁶ and means that the force is more likely to be seen by the public to be operating in an open and transparent way.

Dyfed-Powys Police has adequate monitoring software to provide digital protection. However, this software is not used to its full capability so as to support proactive investigation by the anti-corruption unit. Live time monitoring is not used, which indicates that the monitoring software process is used for reactive investigations and intelligence gathering only, rather than in the proactive pursuit of investigations. It was unclear whether this was due to capacity or capability issues within the unit.

Last year, HMIC recommended that by 31 August 2015 all forces should ensure they have the necessary capability and capacity to develop and assess corruption-related intelligence.¹⁷ While this recommendation has not been complied with by the force, the anti-corruption unit does use software tools that allow monitoring and auditing of some of its in-house systems, such as the use of pornographic sites. This has led to various investigations and has identified discipline breaches. Similar exercises have been carried out in respect of the improper use of force mobile phones, which has also led to disciplinary action. In response to questions about proactive work, the anti-corruption unit explained that it was in the process of developing two matrices that would form the basis of early intervention. However, at present Dyfed-Powys Police is not using the full capability of its systems to undertake proactive intelligence gathering and is still developing systems to enable better and early identification of offenders. Consequently, it does not have a complete understanding of individual or organisational risks to the business.

¹⁶ *Integrity matters*, HMIC, January 2015. Available from: www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/

¹⁷ *Ibid.*

Intervening early to manage risks to integrity

Dyfed-Powys Police acts quickly to manage risks to integrity once identified, but is limited in its ability to undertake proactive investigation for the reasons given above. When an issue is detected, such as the excessive use of the internet for non-police matters, staff are promptly notified with the aim of stopping the activity. Further activity would prompt a disciplinary investigation.

A computer activity monitoring software system is used to monitor the use of digital systems in the workplace and the anti-corruption unit conducts appropriate audits to ensure that no systems are misused. When problems have been identified with officers or staff, meetings have been held with local chief inspectors to avoid further escalation. In addition, staff members who have accrued three or more complaints in a 12-month period are spoken to by their line managers in order to identify any underlying issues.

When asked about proactivity and early intervention to protect the integrity of the organisation, staff explained that they had carried out a systems audit to identify staff who were looking at prohibited websites. Two senior officers were subject to misconduct investigations (both proven) for viewing prohibited websites on force laptops. However, there is no systematic ongoing data collection to help identify vulnerable or corrupt officers. The force is developing two matrices to identify sexual predators and vulnerable officers or staff. A considerable amount of development and consultation has been done, but there has been no recording or analysis so far.

Dyfed-Powys Police takes some preventative action to identify risks at an early stage. This means that the force is able to act swiftly to minimise risks to the organisation in most cases. However, the force needs to do more to maximise every opportunity to collect and assess all of the available intelligence to enable it to intervene early in order to manage all the individual and organisational risks to the organisation.

Looking for, reporting and assessing intelligence on potential corruption

Dyfed-Powys Police undertakes some assessment and reporting of potential corruption. The anti-corruption unit supervises intelligence assessment, development and investigation. However, there are no formal governance arrangements in place, which would provide a clear structure for accountability and action. The anti-corruption unit has no formal daily, weekly or monthly meetings to discuss intelligence cases. Instead, staff who are based in one office hold informal daily conversations about new cases and workloads. A spreadsheet is maintained that lists all the cases, which means that it is possible to monitor current workloads and view priority cases. Notifiable associations are reported through line management to either the vetting unit or the anti-corruption unit. The force records notifiable associations on its intelligence system, but there is no formal process for coordinating and assessing this information with other internal departments which

may help identify potential risks sooner and enable early interventions. Therefore in some cases, opportunities may be missed to discuss and fully understand corruption within the force when it is identified.

Dyfed-Powys Police has systems in place for the anonymous reporting of potential misconduct as recommended by HMIC in 2015.¹⁸ While the force offers support to providers of information, it needs to do more to explore hidden sources of corruption. Staff are fully aware of the processes for reporting misconduct within the force. They explained the use of the 'Safe call' and 'Bad Apple' reporting systems, and said that they would report and challenge poor behaviour within the force. They also said that they felt they would be supported by the force if they did challenge it or individual members of staff about ethics. Since the introduction of 'Bad Apple', more reports had been received via this system than on the 'Safe call' telephone reporting system. Many of the reports received were not matters for the anti-corruption unit and five cases were dealt with by the Code of Ethics committee. The force has recently approached Crimestoppers as an alternative independent means of identifying and reporting misconduct. The Crimestoppers programme enables anonymous reporting of information about corruption. When corruption has been identified, 'gold' groups have been set up to support those making disclosures and to consider their needs in the workplace. The force did not provide evidence that it actively seeks intelligence on corruption from a wide range of sources, such as women's refuges, sex worker support groups and gyms. It recognises the need to be more proactive in this respect and has prioritised Women's Aid refuges as a starting point.

Dyfed-Powys Police has limited capability to seek out and assess intelligence about potential corruption. It is more reactive than proactive in its understanding of potential corruption and undertakes proactive investigations on only on a limited 'ad hoc' basis. The anti-corruption unit has not yet used live-time monitoring and currently uses its monitoring software only to record data for reactive investigations and intelligence development, rather than as a result of proactive investigation. The force has recognised the need to explain to the workforce that the abuse of authority for sexual gain is regarded as serious corruption. It has now included this area of concern in the control strategy, and will work proactively to address the issue. The professional standards department has investigated officers suspected of abusing their authority for sexual gain. The force hopes that the planned staff survey and existing exit interviews will identify any improper behaviour, but accepts that this is an area for further development. The anti-corruption unit intends to include specific education and guidance on abuse of authority, which is due to be published in September 2016. The force does not currently undertake with-cause drug testing but it has made arrangements and plans to do so during 2016. Dyfed-Powys Police does

¹⁸ *Integrity matters*, HMIC, January 2015. Available from: www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/

not yet fully understand the extent to which corruption is having an impact on the organisation, or specifically the extent to which officers may be abusing their authority for sexual gain.

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*.¹⁹ 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 Ethics²⁰ – 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.²¹ HMIC’s 2015 report *Integrity matters*²² 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

¹⁹ *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

²⁰ 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

²¹ 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.

²² *Integrity matters*, HMIC, January 2015. Available from: www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/

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

Dyfed Powys Police recognises the abuse of authority for sexual gain as serious corruption. It is included within the force's control strategy, and the force has communicated to the workforce that it is regarded as serious corruption. However, it is not referred to in the anti-corruption control strategy, since one does not exist within the force. All cases of misconduct, including those relating to abuse of authority for sexual gain, are published internally to demonstrate to the whole workforce the standards expected of them. All such cases are treated as mandatory IPCC referrals.

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

The anti-corruption unit does not carry out a risk assessment of the intelligence that it receives. There is no routine analysis to identify vulnerable officers. Therefore, early intervention is dependent upon more general activities such as educating the workforce and marketing the anti-corruption unit as a deterrent. The force has well-recognised reporting mechanisms to acquire intelligence, but it does not yet proactively seek intelligence. The anti-corruption unit staff do not actively seek intelligence from a wide variety of sources, such as visiting local gyms, street workers, and licensees. Therefore the force is not pursuing active preventative measures to address the abuse of authority for the purpose of sexual gain. The force recognises that more needs to be done and anti-corruption unit staff have plans to market their work to include specific education and guidance about the abuse of authority at the next regional domestic abuse forum. In addition, the head of the professional standards department has written an open letter to all service providers that work with victims of domestic abuse, to encourage the sharing of intelligence through Safecall, Crimestoppers and direct to the professional standards department. This letter will also be shared with regional safeguarding boards. The force is looking to buy a new system to replace digital monitoring software, which will allow the anti-corruption unit to monitor the abuse of force IT systems more effectively. This has been identified by the force as an area which requires development.

Taking action to prevent abuse of authority for sexual gain

The force's professional standards department has conducted investigations relating to officers abusing their authority for sexual gain. It also hopes that the forthcoming staff survey and analysis of exit interviews will identify any such cases of serious misconduct. We were advised by the force that the force area has relatively few sex workers compared with metropolitan forces and as a consequence, Dyfed-Powys

Police focuses more on the targeting of domestic violence victims rather than sex worker support groups. It has identified some trends as a result of this work and has some understanding of the scale and source of the problem, but it accepts that more needs to be done in this respect, especially concerning the collection of intelligence received by the anti-corruption unit.

The force is working with domestic abuse service providers to ensure that potential victims understand the warning signs of officers and staff seeking to abuse their authority for sexual gain. The professional standards department will provide the force with ethical dilemmas to help officers and staff understand the professional standards expected of them. A risk matrix is also being developed within the anti-corruption unit to enable the early identification of officers and staff who are seeking to exploit their positions. Specific training is provided for sergeants and on all new recruitment training for officers and PCSOs. It is also now included in presentations on other courses. The IPCC's 'Learning the Lessons' report is discussed at the force's 'learning the lessons' group and tasks are allocated to ensure wider understanding. This means that the force is taking steps to understand better the abuse of authority for sexual gain, although it accepts that more work needs to be done in this respect.

Building public trust

All cases of corruption, including misconduct, are published internally and externally on the force websites. Where required, community impact assessments are undertaken in areas where officers have been suspended such as in relation to perverting the course of justice or misconduct in public office. This extends to those facing allegations of sexual misconduct.

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.²³ 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.

²³ *Literature review – Police integrity and corruption*, HMIC, January 2015. Available at: www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/

Working with the public

Dyfed-Powys Police communicates with the public about the outcomes of misconduct and corruption cases as previously recommended by HMIC.²⁴ Our inspectors reviewed the force website and confirmed that this was the case. The professional standards department also provided a link to an outstanding case. The force has yet to hold misconduct hearings in public, but there are two cases awaiting a public hearing. On a regular basis, the College of Policing receives information from the force about disapproved officers. Intelligence logs are also created for Police National Database purposes so that detailed information is available should checks be needed regarding any future employment. Details of chief officers' expenses, and gifts and hospitality, are currently included on the expenses page of the force website, and the College of Policing website is gives members of the public a link to this. The professional standards department recognises the impact of misconduct cases on public trust and confidence, and has requested that community impact assessments are completed to gather information and feedback from the community. The people of Dyfed Powys can therefore expect to be kept informed about the outcomes of misconduct and corruption cases.

Working with the workforce

Dyfed-Powys Police works with its staff to address the outcomes of misconduct and corruption cases. It does this through daily briefings or routine orders, with a reminder of what is expected of them and references to the Code of Ethics. Whenever such cases arise they are given priority, which signifies their importance to the force. When necessary, the briefing includes a link to the relevant policy, for example social media usage. The force also publishes the outcomes of misconduct cases on its intranet. Our inspectors reviewed this to see how clearly the force provides details of complaint and misconduct hearings, and considered three separate outcomes. All three included a good description of the conduct alleged, the outcome, lessons to be learned and the consequences of future wrongdoing. Staff had previously raised concerns about the outcomes of dissatisfaction cases that are dealt with by the OPCC. The outcomes of dissatisfaction cases are now discussed with the force, which gives managers a greater understanding of the issues that cause dissatisfaction. The workforce can therefore expect to be kept informed about the outcomes of misconduct and corruption cases. This open and transparent policy should give officers and staff a greater sense of pride and more confidence in the service they provide, thereby promoting ethical behaviour further.

²⁴ *Integrity matters*, HMIC, January 2015. Available from:
www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/

Summary of findings



Requires improvement

Dyfed-Powys Police requires improvement in how well it ensures that its workforce behaves ethically and lawfully. The force vets applicants to ensure that it recruits officers, staff and volunteers with high standards of ethical behaviour and regularly clarifies and reinforces what is considered to be acceptable and unacceptable behaviour. It should carry out vetting more swiftly to avoid backlogs.

The force has some understanding of threats to the integrity of the organisation and has some formalised processes in place for staff to report business interests and notifiable associations. The force has adequate monitoring software to provide digital protection but it is not used to its full capability. It has systems for anonymously reporting potential misconduct but does not yet have a full understanding of the extent to which corruption is having an impact on the organisation. It is more reactive than proactive in understanding potential corruption and needs to gain a better understanding of the extent to which officers may be abusing their authority for sexual gain. However, Dyfed-Powys Police communicates well with the public and its workforce about the outcomes of misconduct and corruption cases, and now takes positive action to improve the way it reduces risks to the organisation.

Areas for improvement

- The force should ensure it complies with all aspects of the current national guidelines for vetting.
- The force should take immediate steps to introduce a policy for notifiable associations.
- The force should improve how corruption intelligence is assessed and graded.
- 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 establish and operate effective processes for identifying and managing individuals at risk of corruption.

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.²⁵ 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.²⁶ 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

Dyfed-Powys Police offers various ways for members of the workforce to express opinions of fair and respectful treatment. However, the force has done very little analysis to identify and understand the areas that have the greatest impact on workforce perceptions. For example, a staff survey has not been undertaken since

²⁵ *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
f 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

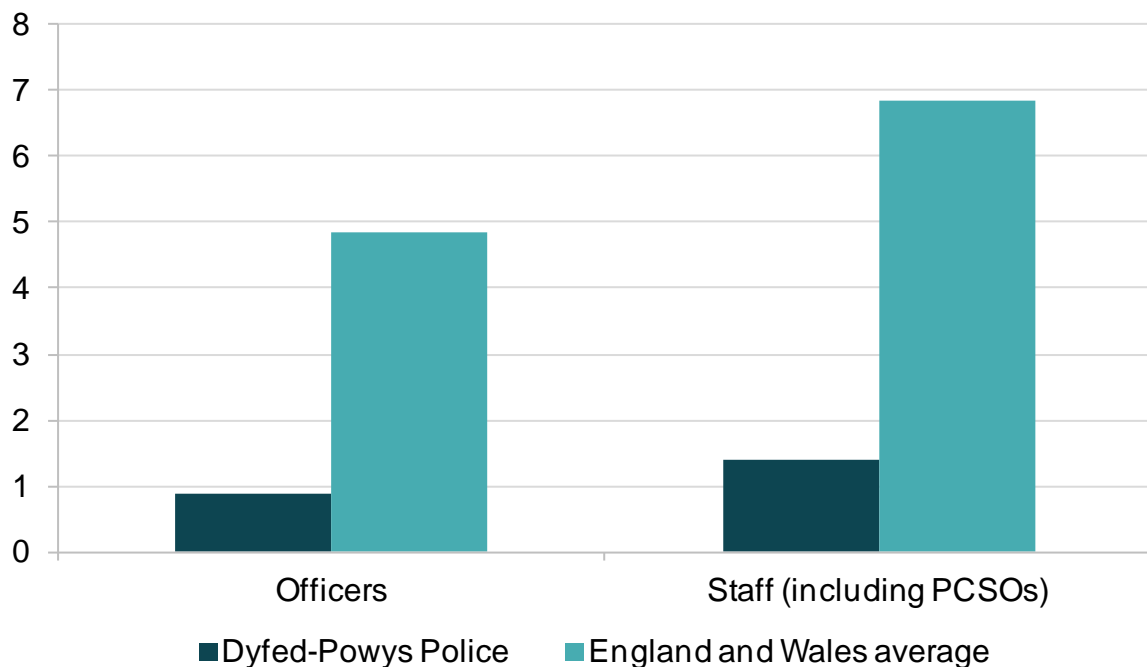
²⁶ *Fair cop 2: Organisational justice, behaviour and ethical policing*, College of Policing, 2015, page 11. Available at:

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

2012 and therefore the force cannot know whether staff feel valued and involved. Furthermore, there is no evidence to suggest that the force acted on the outcomes of the 2012 survey. The force recognises this as an issue and is in the process of undertaking a staff survey in 2016. It organises exit interviews for all staff and has done some limited data analysis on the findings. It plans to extend its work in this area. There is a formal grievance procedure, known as the ‘fairness at work policy’, but this is rarely used.

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 Dyfed-Powys 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, Dyfed-Powys Police finalised 0.9 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 1.4 formal grievances raised by staff per 1,000 staff (including PCSOs), which was lower than the England and Wales average of 6.8 per 1,000 staff (including PCSOs).

The force also has a staff suggestion scheme and a chief officer’s blog, where members of staff can leave electronic messages. More recently, the force has introduced a Code of Ethics committee. The aim of this committee is to support all staff and encourage them to submit any issues that have led to any degree of ethical

or moral dilemma. The force has not undertaken sufficient analysis of its workforce to be able to identify those areas that have the greatest impact on staff perceptions of fair and respectful treatment. It may therefore be treating some staff less well than others.

Making improvements and demonstrating effectiveness

Dyfed-Powys Police has recognised that it needs to be more proactive in involving the workforce in everyday activity designed to encourage fair and respectful treatment. To date, the extent of this work has been limited. The force has recently started a consultation process with staff and staff associations, to enable it to undertake its first staff survey since 2012. Chief officers have stated their intention to undertake a staff survey on an annual basis, and all staff have been told this. The force's strategic equality objectives for 2016–2020 were developed using feedback received from staff and officers. Their involvement in developing the objectives has been recognised, and the new objectives have been well promoted. In future, staff and officers will be updated on progress made against these objectives as part of an on-going internal communications strategy. They will also be offered an opportunity to contribute to achieving these objectives. These are all welcome initiatives. However, the force has been generally slow to invest in involving its workforce and in its understanding of the consequences of not doing so. This means that some members of the workforce have not had the opportunity to participate in the future direction of the force, and these individuals may feel less valued as a result.

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

Understanding and valuing the benefits

Dyfed-Powys Police understands and values the benefits of workforce wellbeing. The force has links with UNISON and the Police Federation as well as all the support networks. The Female Staff Support Network has recently hosted two 'Confidence in the workplace' events. These networks have access to chief officers if they wish to raise issues that cannot be resolved through normal channels. There is a wellbeing plan but this is based on a survey carried out in 2012. A new wellbeing strategy is being developed as part of the people services action plan for 2016/17. The force is also in the process of enrolling onto the Department of Health Workplace Wellbeing

Charter as advised by the National Wellbeing and Engagement Group. It was previously signed up to the police-specific workplace 'Police Charter'. The force has a clear grievance procedure known as 'Fairness at work' but it is rarely used. The policy has gone through a consultation process involving recognised union and staff associations, and has also been subject to equality impact and human rights compliance assessments. The force has produced guidance to help line managers deal with fairness at work issues, and also has a management of stress at work policy. Over the last 12 months, it has introduced several awareness and training programmes related to health and wellbeing. These have been positively received by staff. Officers and staff explained that the force has introduced wellbeing road shows and medical and health support, as well as a recent awareness campaign around mental health. Staff spoke positively about occupational health support and access to support services within the force. They could identify how to access services and felt positive about the support they would receive. Dyfed-Powys Police offers a range of services and facilities for improving the wellbeing of its workforce. Staff and officers have several ways in which they can access help in order to improve their wellbeing.

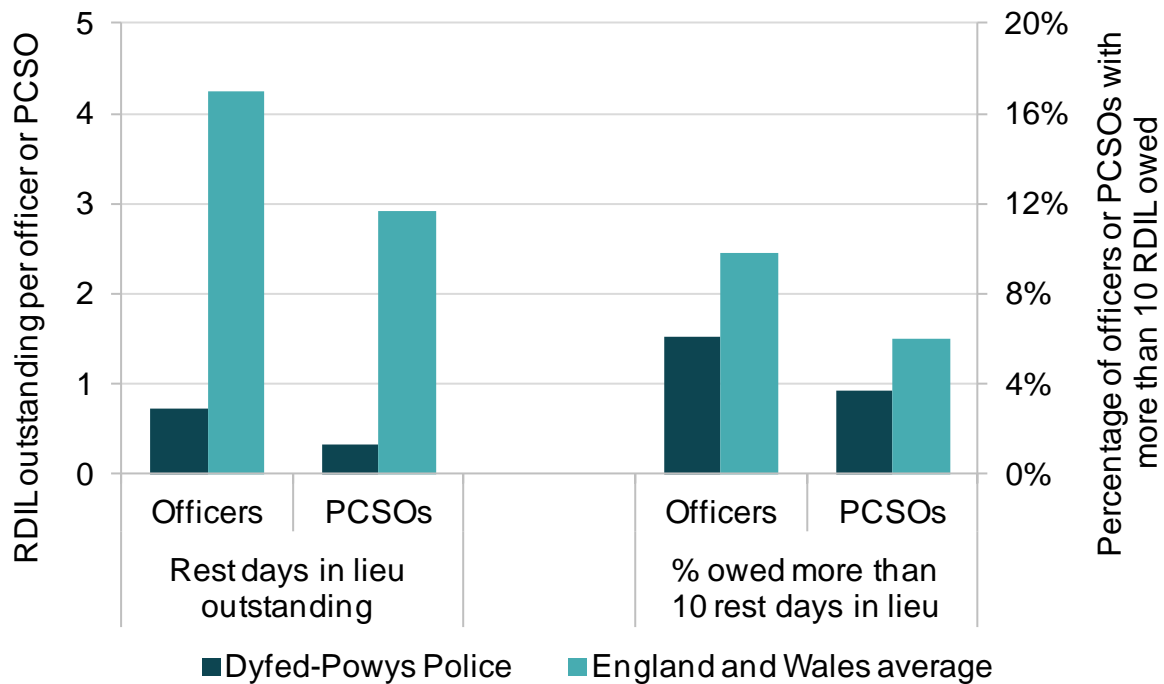
Identifying and understanding the workforce's wellbeing needs

Dyfed-Powys Police has several ways in which it can identify the wellbeing needs of its workforce, and works with staff to better understand their concerns. Services include a counsellor at the police headquarters, a chaplaincy service and a trauma risk management screening process to identify staff who have experienced trauma and may need counselling or occupational health intervention. The force also sends out an annual health questionnaire to all officers, and this was extended to police staff in May 2016. It is designed to ensure that officers and staff are safe and fit from both a physical and psychological perspective to undertake their roles. It also helps to identify trends and enables the force to work with operational leads to address these. This has been identified as an area of good practice. The force is aware of the underlying issues affecting wellbeing. Senior leaders who are responsible for protecting vulnerable people explained that staff wellbeing is at the forefront of their minds. They are particularly mindful of increasing workloads, and this has resulted in a commitment to increase staff numbers for protecting vulnerable people. In January 2014, the force completed the Investors in People assessment and gained a Silver Accreditation. A further assessment to show improvement at the end of 2016 has been requested by Dyfed-Powys Police. The force is committed to the wellbeing of its workforce. Staff feel valued and understood as a result.

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 Dyfed-Powys Police compared with England and Wales, as at 31 March 2016



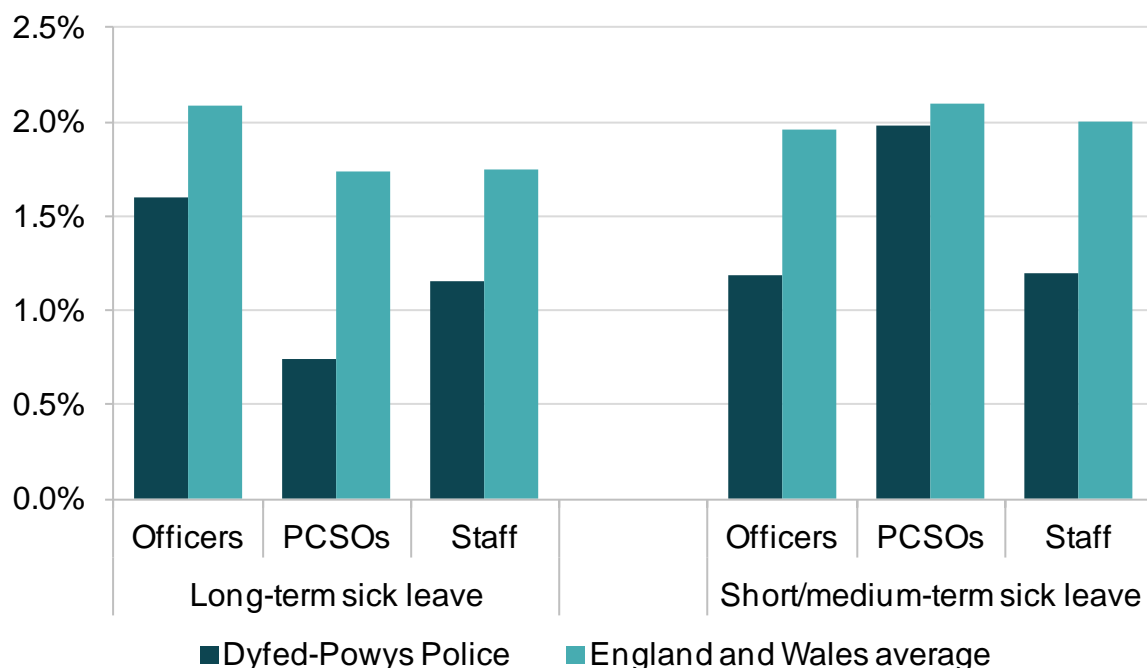
Source: HMIC Legitimacy data collection

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 0.7 rest days in lieu outstanding per officer in Dyfed-Powys Police, which was lower than the England and Wales average of 4.2 days per officer. On the same date, there were 0.3 rest days in lieu outstanding per PCSO in the force, which was lower than the England and Wales average of 2.9 days per PCSO. As at 31 March 2016, 6.1 percent of officers in Dyfed-Powys Police had more than 10 rest days in lieu owed to them, which was broadly in line with the England and Wales average of 9.8 percent. As at 31 March 2016, 3.7 percent of PCSOs in the force 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 this data can also help forces to identify and understand the nature and causes of sickness at individual and organisational levels, and inform targeted activity to prevent and manage sickness.

Figure 5: Percentage of officers, police community support officers and staff on long-term and short/medium-term sick leave in Dyfed-Powys 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.

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

Dyfed-Powys Police takes preventative and early action to improve workforce wellbeing. We were able to observe case conferences where the welfare of suspended officers was considered appropriately by the force. Information is assessed in relation to a suspended officer to ensure that the force is discharging its duty of care in an effort to preserve the welfare of the person concerned. This duty of care extends to undertaking community impact assessments and referral to third-party welfare organisations. In 2015/16, the force advised HMIC inspectors that it had approved 140 flexible working applications for police and staff members. The force is in the process of establishing an Ability Working Group, which will allow it to address any concerns related to disability. Staff support networks and diversity champions will be invited to participate. The force has a good approach to undertaking trauma risk incident management (TRIM) assessments. As a result of this positive work, the officers and staff of Dyfed-Powys Police can feel confident that the organisation is doing all it can to take preventative and early action to improve their wellbeing. This means that they, and in turn the public, receive a better level of service from the organisation.

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.²⁷ 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.²⁸

The performance assessment process

Dyfed-Powys Police does not have a fair or effective performance assessment process for officers and staff. Scrutiny arrangements are poor and HMIC saw no evidence that a recent evaluation had been undertaken to ensure consistent reporting throughout the organisation. A new performance development review (PDR) was introduced in June 2015 and is managed through the force's electronic reporting system, iTrent. The force's performance assessment process and behavioural competencies are devised to match the 'Making it count' criteria. The

²⁷ *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

²⁸ College of Policing guidance on the police PDR process is available at:

www.college.police.uk/What-we-do/Support/Reviewing-performance/Pages/PDR.aspx

force encourages feedback by building self-assessment into the process and encouraging honest conversations between staff and their supervisors. However, at the time of the inspection, we were advised that the PDR process had been suspended due to technical difficulties. It was intended by the force that an analysis of the PDR process should be undertaken in the summer of 2016, when all staff should have completed one annual cycle using the new reporting system. However, as the process is suspended any assessment process would be significantly undermined. Officers and staff HMIC spoke with were confused as to when the reporting year started, with some believing that appraisal was now undertaken on an ad hoc basis by their immediate line manager. We could not see that the PDR process included any central supervision of the consistency of reporting, fairness or development. This means that the standard of report writing may not be as high as it should be and that officers and staff receive varying levels of service from their line managers.

The results of performance assessment

The force's attendance and performance team monitors staff with a grade of 'managed performance' to ensure that appropriate actions are taken and support is in place for those staff and officers where additional help is deemed necessary. The performance management process is set out in the attendance and performance management policy. Expectations of continuous professional development are built into the three review periods within the performance management cycle. Individuals can comment if they believe that their managed performance assessment is unfair or they wish to dispute their grading. Those officers and staff HMIC spoke with were largely of the opinion that the process does not allow the force to understand individual development, nor does it take personal circumstances into account. The focus appeared to be around performance improvement rather than personal development. They also felt that the quality of the reporting process was dependent on the professionalism of their supervisor and, because this was variable, the outcomes lacked consistency. This suggests that the performance management training process is either not as effective as it could be, or that the force has failed to express clearly the importance of completing the managed performance – and PDR process more generally – to a consistent and high standard.

Summary of findings



Requires improvement

Dyfed-Powys Police requires improvement in the extent to which it treats its workforce with fairness and respect. The force offers various ways in which members of the workforce can express opinions of fair and respectful treatment, but has done little analysis to identify and understand the areas that have the greatest impact on workforce perceptions. It recognises that it needs to be more proactive in involving the workforce in everyday activity designed to encourage fair and respectful treatment. The extent of this work is limited. The most recent staff survey was in 2012 and there was little evidence that the force had acted upon any feedback received. The force understands and values the benefits of workforce wellbeing and has several ways in which it can identify the wellbeing needs and concerns of its workforce. It takes preventative and early action to improve workforce wellbeing. The force does not have an established, fair or effective performance assessment process for its workforce. The attendance and performance team monitors staff with a grade of 'managed performance' to ensure that appropriate actions are taken and support is in place. However, the performance assessment training process is not as effective as it could be.

Areas for improvement

- The force should improve how it identifies and understands the issues that have the greatest impact on workforce perceptions of treatment.
- The force should improve how it manages individual performance.

Next steps

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

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

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

Annex A – About the data

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

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

Methodology

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

Comparisons with England and Wales average figures

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

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

Statistical significance

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

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

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

Population

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

Force in numbers

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

These data are obtained from the Home Office annual data return 502. The data are available from the Home Office's published Police workforce England and Wales statistics, www.gov.uk/government/collections/police-workforce-england-and-wales, or the Home Office police workforce open data tables, 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: 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.²⁹

Data used in figure 1 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

²⁹ *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

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 2: 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 2 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 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.

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