



Promoting improvements
in policing to make
everyone safer

PEEL: Police legitimacy 2016

An inspection of Humberside 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%202_FINAL_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 Humberside Police.

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

Force in numbers



Workforce

Total workforce as of 31 March 2016

2,916

Total workforce breakdown as of 31 March 2016

officers

1,582

staff

1,115

PCSOs

220



Ethnic diversity

Percentage of BAME in workforce 31 March 2016

overall workforce

1.2%

officers

1.3%

staff

1.0%

PCSOs

1.4%

Percentage of BAME in local population, 2011 Census

3.5%



Gender diversity

Percentage of females in overall workforce 31 March 2016

44%

England and Wales population, 2011 Census

51%

Percentage of females by role 31 March 2016

Humberside Police

officers

31%

staff

61%

PCSOs

54%



Public complaints

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

Officers

Humberside Police

281

England and Wales force average

268

Staff (including PCSOs)

78

61



Grievances

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

Officers

Humberside Police

27.2

England and Wales force average

4.8

Staff (including PCSOs)

26.2

6.8



Victim satisfaction

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

Humberside Police

92.3%

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



Good

Humberside Police has been assessed as good in respect of the legitimacy with which it keeps people safe and reduces crime.

Humberside Police understands the importance of treating the people it serves with fairness and respect, actively seeking feedback and challenge from the community about the extent to which it does so. The force has a good understanding of local and national corruption threats, and has a robust vetting process in place.

Overall summary

Humberside Police understands the importance of treating the people it serves with fairness and respect. This is intrinsic to its vision and values, which are well understood by the workforce. The force actively seeks feedback and challenge about the extent to which it treats members of the public with fairness and respect, including those from new or emerging communities and those groups that have less trust and confidence in the police.

The force listens to and acts on information from communities, the Independent Police Complaints Commission, independent custody visitors and others within discrete business areas. However, the force website does not describe the force's accumulated activities in response to feedback to improve treatment and fairness.

The force has a good understanding of local and national corruption threats, and these have informed its intelligence requirements and prevention activities. The force has a robust vetting process, including reviews in advance of a role change or promotion. It clarifies and reinforces expected standards of behaviour to those in post using, for example, posters and proactive professional development days to discuss ethical dilemmas.

The force has a good range of approaches to gather timely intelligence, in line with approved practice, but it could do more to identify officers who have abused – or are at risk of abusing – their authority for sexual gain.

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

The force publicises misconduct hearings for police officers and police staff, and shares the outcomes internally with staff and on the force's website. It has also acted on all five recommendations from HMIC's 2014 police integrity and corruption inspection.

The force has a range of methods – including a staff forum – to identify issues that affect the workforce's perceptions of fair and respectful treatment, but it could do more to show how feedback has been used to make improvements.

The force values the benefits of workforce wellbeing and has established good provision to support it. Supervisors are adequately prepared and supported in their wellbeing responsibilities.

The force's individual performance assessment process was not effective at the time of the inspection. It launched a new one in June 2016. The force's processes to tackle poor individual performance were unsatisfactory.

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 perceptions of how the police have treated them.
- 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

Treating people with fairness and respect is well established in the vision and values of Humberside Police. The vision and values are core parts of the leadership strategy, the promotion processes and communication both with the public and within the force.

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 workforce has a good understanding of the need to treat people fairly and with respect. The values set out in the Code of Ethics⁶ were communicated to all members of the force when the code was launched. The force continues to train new officers and staff, including volunteers, in the code and how it links to customer service. It uses proactive professional development days to further emphasise the Code of Ethics, which is inextricably linked to the force values, through discussion of ethical dilemmas and with the support of videos, intranet articles and posters.

The force has continued to develop its understanding of the needs of the local communities since our 2015 legitimacy inspection. It understands that it can still do more to develop the workforce's understanding of the importance of treating people with fairness and respect, and it is currently developing training for officers about procedural justice, primarily in explaining how and why police powers should be used.

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

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

Seeking feedback and challenge

Humberside Police uses a range of methods to seek feedback and encourage challenge from the communities it serves. These communities include those that are new and emerging within Humberside and groups that have become disaffected with the police.

The police and crime commissioner undertakes a quarterly survey of 500 people from each of the four local authority areas (the sample reflecting the age and gender of the population).

'Cohesion' meetings are held in each local authority area and attended by senior leaders from the force. Members of the local community are invited to these meetings, and there is focused involvement with representatives of communities that are less likely to give feedback to the police. The meetings discuss the police service and the force invites feedback on how it treats the community.

⁶ *Code of Ethics*, College of Policing, 2016. Available from: www.college.police.uk/What-we-do/Ethics/Pages/Code-of-Ethics.aspx

The force attends the Humber All Nations Alliance meetings, which have representatives from over 70 communities and groups across Humberside. Here the force builds relationships with the communities, and listens to their concerns and feedback. In turn, the force updates communities on its activities in response to their earlier feedback.

The force attends a multi-agency diversity panel, consisting of members of the community and a broad range of local services, such as youth offending, prison and probation as well as the police. The panel scrutinises community issues, such as the use of stop and search, complaints about the use of stop and search powers and Taser use involving vulnerable adults or children. Representatives are allocated areas of concern to review, and report back to the panel at a future date.

The force has developed positive relationships with individuals from communities who work with the community teams. It uses them to seek feedback and challenge regarding community concerns, and to act as a channel for sharing information about policing with other members of their communities.

The force uses social media accounts to seek information, including feedback on policing. For example, the force updates the community through its social media accounts during proactive operational work, such as when it is executing search warrants, and it seeks further information from the community to support operational activity and increase safety. The force has had positive feedback and useful information from the community during such proactive campaigns.

The Humberside Police website gives the public advice on how to provide positive and negative feedback online and elsewhere, including clear information about how to give a compliment or make a complaint, as well as how a complaint will be handled.

The office of the police and crime commissioner (OPCC) manages an independent custody visiting scheme (ICVS). It has 21 trained and experienced volunteers who periodically make unannounced visits to custody suites. The visitors receive feedback from those who are detained in custody. Any immediate action that may be required is drawn to the attention of the custody sergeant to deal with. The scheme produces a bi-annual report for the PCC identifying custody developments and the issues that have arisen during visits. HMIC spoke to the ICVS administrator, who is confident that the force listens and acts in response to visitors' feedback.

The force works widely with communities and not just those in direct contact with the police as a victim, witness or suspect. Police community support officers (PCSOs) hold street briefings at community centres or other public buildings in each local authority area once a month. This allows messages to be passed on to the public and the public to feed back to the force.

The force also supports the involvement of staff forum members with groups that often have less confidence in the police. Its members attend a range of events including the Brigg horse fair, communicating with the Gypsy, Roma and Traveller communities, and the annual Pride event in Hull, where staff meet members of the lesbian, gay, bisexual and transgender community.

In August 2014, following HMIC's 2013 inspection on the effective and fair use of stop and search powers,⁷ the Home Office published guidance to police forces on how to implement the Best Use of Stop and Search (BUSS) scheme.⁸ The scheme aims to increase transparency and community involvement, and to support a more intelligence-led use of the powers leading to better outcomes. All police forces in England and Wales signed up to participate in the scheme. In 2015, HMIC's legitimacy inspection⁹ considered the extent to which the force was complying with the scheme and found that it did not comply with all features of the scheme. In autumn 2016, HMIC will re-assess the force's compliance with those features of the scheme that it was not complying with in 2015. We will publish our findings in early 2017.

Identifying and understanding the issues

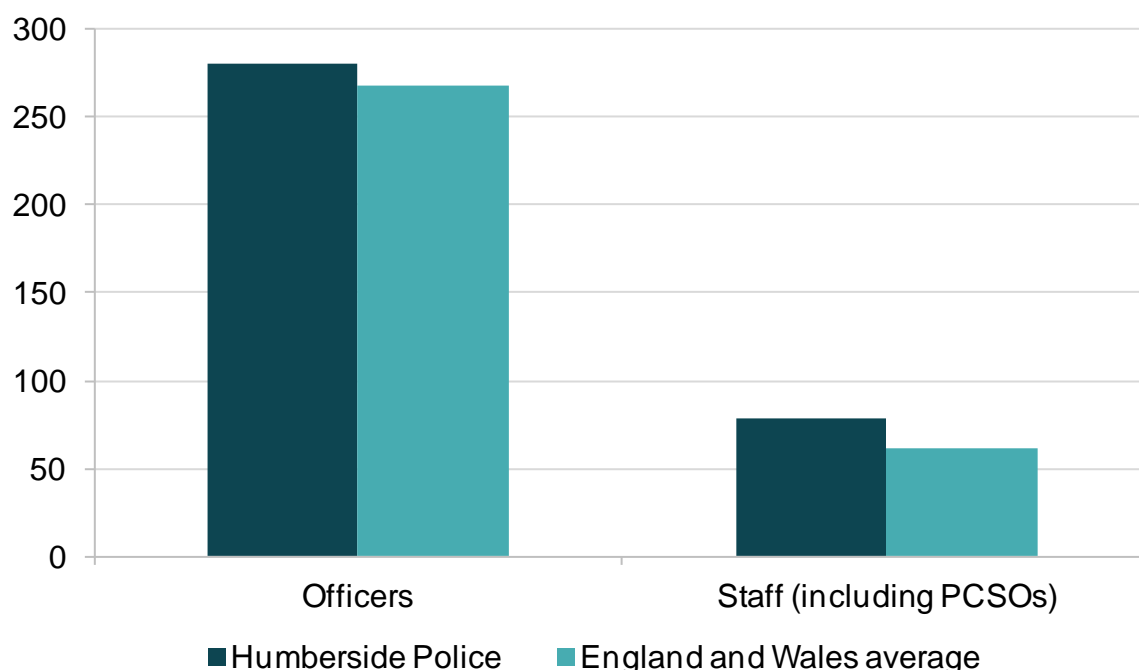
Each force in England and Wales is required to record the nature of complaint cases and allegations and be able to produce complaints data annually. The numbers and types of complaints are valuable sources of information for forces and can be used to help them identify areas of dissatisfaction with their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

⁷ *Stop and Search Powers – are the police using them effectively and fairly?* HMIC, July 2013. Available from: www.justiceinspectorates.gov.uk/hmic/publications/stop-and-search-powers-20130709/

⁸ *Best Use of Stop and Search Scheme*, Home Office, August 2014. Available at: www.gov.uk/government/uploads/system/uploads/attachment_data/file/346922/Best_Use_of_Stop_and_Search_Scheme_v3.0_v2.pdf

⁹ *PEEL: Police legitimacy 2015 – A national overview*, HMIC, February 2016. Available at: www.justiceinspectorates.gov.uk/hmic/publications/police-legitimacy-2015/

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 Humberside 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, Humberside Police recorded 281 public complaint cases per 1,000 officers, which was broadly in line with the England and Wales average of 268 cases per 1,000 officers. During this period, the force recorded 78 public complaint cases per 1,000 staff (including PCSOs), which was broadly in line with the England and Wales average of 61 cases per 1,000 staff (including PCSOs).

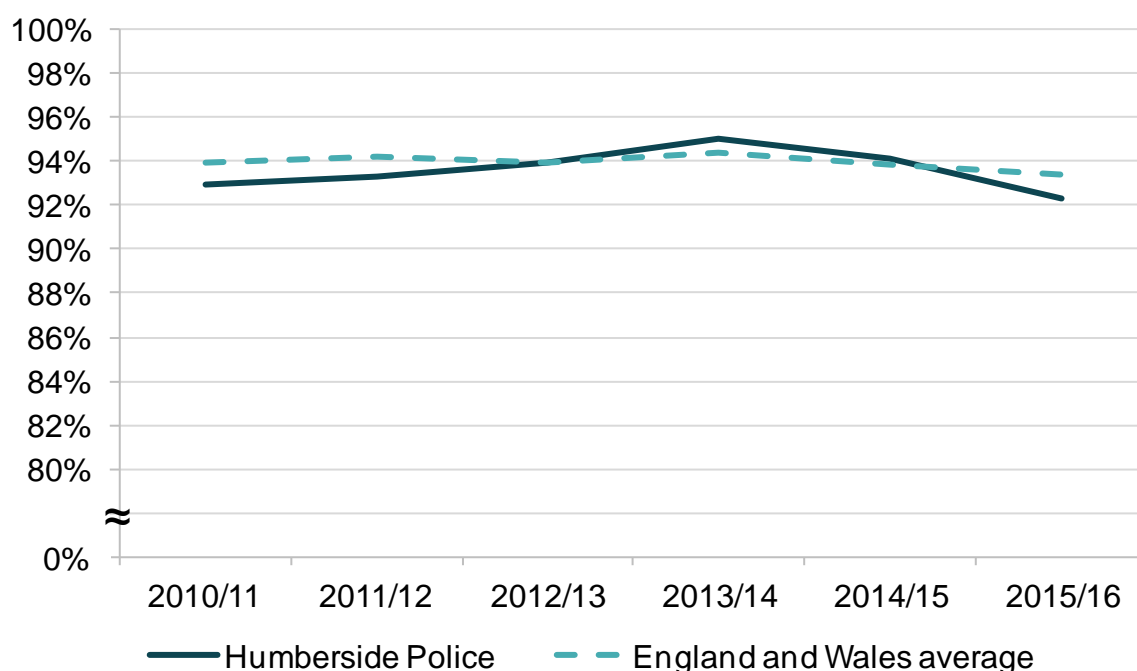
The most recent Independent Police Complaints Commission (IPCC) data from forces show that, for April, May and June 2016, the types of complaint most frequently recorded by Humberside police are 'other neglect or failure in duty' and 'incivility, impoliteness and intolerance'.¹⁰ It is important to note, however, an issue identified during our 2014 police integrity and corruption inspection;¹¹ 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.

¹⁰ Independent Police Complaints Commission data is available at:
www.ipcc.gov.uk/reports/statistics/police-complaints/police-performance-data

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

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 Humberside 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, 92.3 percent of all victims of crime (excluding hate crime) who responded to the victim satisfaction survey were satisfied with the overall treatment provided by Humberside Police, which was broadly in line with the England and Wales average of 93.4 percent; and lower than the 94.2 percent who were satisfied with the overall treatment that the force provided in the 12 months to 31 March 2015, this is a statistically significant difference.

As well as these ways of obtaining feedback, Humberside Police has a range of methods for identifying issues concerning fair and respectful treatment: for example, public perception surveys, online reporting of both positive and negative feedback, independent custody visitors, dedicated neighbourhood patrols and a team of cohesion officers.

Members of a diversity panel conduct mystery shopping exercises on behalf of the force to test its response to reports of anti-social behaviour, hate crime and incidents involving people with mental health issues. Members call the contact management centre or go to the front desk to make their reports and provide feedback to the

community engagement team on how they were treated. Learning from these exercises is used to assist individual officers and staff, and to improve policy and training through the force's learning programme.

Humberside Police has a team of cohesion officers who work within the force's community engagement team. They identify and build relationships with new or emerging communities, as well as groups that are less likely to provide feedback to the police.

The force works with the community in various ways and is able to identify issues for individual communities concerning police involvement, incidents and fair treatment. If the information collected had greater depth, it could provide a good picture of how Humberside communities feel and perceive that they and others are treated by their police force, and the issues they may have. The force analyses the information it receives from some areas, for example from complaint reports and independent custody visitor feedback, but other information such as on stop and search is not comprehensively mapped. This limits the force's ability to identify and understand what lies behind negative and positive experiences, and then to address the issues to improve trust and confidence among the public.

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

Humberside Police can show how it has made improvements to its service based on feedback from its communities in discrete business areas. The force provides updates through its website and active use of social media sites, in person to key individuals and community meetings, and in formal meetings such as those of the diversity panel and the Humberside All Nations Alliance, members of which can then update their communities. The force does not have a system for tracking how services are improved across its business areas in response to feedback and its own identification of issues around fair and respectful treatment.

The head of the force's professional standards branch, which reviews and investigates misconduct and complaints made against the police, leads a learning group that considers themed issues. The group includes representatives of the human resources department, the force's legal team and health and safety

representatives. A recent example of a 'themed issue' was how people are treated in custody. The group considered complaints, learning from the professional standards branch and IPCC investigations, 'near miss' reports, civil actions and ICVS recommendations. It identified some inconsistency in the approach of staff to health and welfare issues raised by detainees, and raised these with the custody board. The board has taken a number of steps to ensure that all detainees are treated consistently. These include locating custody lead inspectors within custody suites, using remote live monitoring, and dip sampling the custody booking-in processes. Custody staff also received extra training on the health and safety of detainees as a result.

Diversity panel members attend initial and refresher Taser training sessions. They observe the different scenarios used to test officers. Feedback from the panel members has been used to adapt the training provided. The force recognises the value the different backgrounds of panel members add, in that they have improved the understanding of staff and trainers about diversity issues affecting the use of Tasers. Attending the training is also valuable to panel members in scrutinising Taser use. Similarly, panel members' observations are used to inform the continuing development of training for officers. Since the 2015 legitimacy inspection, the force has included information on the number of Taser-trained officers, and the type and extent of Taser use on the force website so that the information is readily available to the community. The OPCC has also carried out a public survey on the use of Taser. The force plans to include feedback from panel members on Taser use as its next step in improving transparency and raising public confidence in the legitimate use of the tactic.

The force has worked closely with its communities and asked them what changes would have the greatest impact on their confidence in policing. Two priorities emerged: greater visibility of local officers, focused on their community; and greater transparency in the actions police were taking in their communities. The force has responded to the issues raised in the public perception survey by re-introducing dedicated beat managers and PCSOs in local communities, and developing a strategy to tell people how the force is responding to community concerns. The strategy includes locally developed patrol plans and communication tailored to specific groups. The changes made by the force have been in response to community and partner feedback, and have increased visibility and availability to promote fair and respectful treatment among the people served. For example, after a recent series of drug warrants executed by the operation impact team, the force ensured that it had staff and volunteers able to explain the police activity in the first languages of the people in the affected area.

Demonstrating effectiveness

The force constantly works with its communities and learns lessons from IPCC investigations, misconduct, grievances, health and safety incidents and HMIC inspections. It also takes steps to identify and understand the policing requirements of emerging communities and groups with less trust and confidence in the police. The force can show that it has acted on much of the information it has received, changing policy and practice, and developing individual officers and staff within discrete business areas: for example, the changes to the force's operating model and neighbourhood policing provision to support the service and treatment the force provides to the community. However, the force could do more to evaluate the effectiveness of the changes it makes to improve its treatment of the people it serves.

Summary of findings



Good

The force uses a wide range of methods to engage with the communities it serves and to understand the needs of emerging communities and groups with less trust and confidence in the police. Issues are identified from this work and addressed, or, if more systemic, shared with the relevant command for action. The force can show that it listens to and acts on information from communities, the IPCC, the ICVS, etc. within discrete business areas, but there is no effective way to monitor feedback to the force.

There is no complete picture of how the force treats, or is perceived to treat, its communities. The website does not inform the public of accumulated activities to improve treatment and fairness in response to the feedback it has received.

Area for improvement

- The force should improve how it seeks feedback from the people it serves about their perceptions of how the police have treated them.

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.¹² 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.¹³

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.¹⁴ 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.

¹² *Integrity matters*, HMIC, January 2015. Available from:
www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/

¹³ *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

¹⁴ *Promoting ethical behaviour and preventing wrongdoing in organisations*, College of Policing, 2015. Available at:
http://whatworks.college.police.uk/Research/Documents/150317_Ethical_leadership_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

Humberside Police has a robust approach to vetting, which complies with national police vetting policy.¹⁵ The force vets all new police officers, police staff and volunteers as part of the recruitment process. It understands how the residence criteria can affect applicants with a British, Black, Asian and minority ethnic background. Where the only reason for vetting refusal is residency, the vetting officer meets with representatives from human resources and community engagement teams to review the application. Appointments are made where they are consistent with the force's desire to maintain an ethical culture.

The force ensures that applicants to the force are not on the 'disapproved register' held by the College of Policing. This 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 regularly updates the College about former police officers and police staff who should not be allowed to work in other law enforcement agencies.

Clarifying and reinforcing standards of behaviour

The force continues to clarify and reinforce standards of acceptable and unacceptable behaviour effectively through its internal communications, training and bespoke briefings for police officers and police staff. Members of the workforce HMIC spoke to were clear about the importance of integrity and standards in their work, and what those standards are.

The force uses its internal publications, The Humberside Standard and Behind the Headlines, to highlight good work or address unacceptable behaviour. The content in each edition of The Humberside Standard is focused on an area or department, and is based on lessons learned and public feedback about good service and standards that need to be improved.

In consultation with the professional standards branch, which reviews and investigates misconduct and complaints made against the police, the force also publishes guidance intended to safeguard the integrity of the force. Recent articles have included advice on identifying and reporting notifiable associations (those individuals who could pose a risk to the integrity of an individual employee or the force itself). Employees are required 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 ACPO / ACPOS National Vetting Policy for the Police Community, Association of Chief Police Officers, 2012. Available from: [www.northants.police.uk/files/documents/Freedom Of Information/ac^ACPO National Vetting Policy.pdf](http://www.northants.police.uk/files/documents/Freedom%20Of%20Information/ac^ACPO%20National%20Vetting%20Policy.pdf)

ACPO is now the National Police Chiefs' Council.

The corporate communications team also publishes a series of posters called 'PC Chancer', illustrating ethical dilemmas to reinforce the standards of behaviour expected of officers.

The force weaves the Code of Ethics into classroom training for officers and staff. For example, it is now intrinsic to the initial police officer learning and development programme, which means that ethical considerations should be part of everyday decision making by supervisors. Similarly, the 'life of a crime' training for officers focuses on meeting the needs of victims and witnesses, including the importance of fair treatment.

The proactive professional development days focused on ethical dilemmas had a very strong resonance among officers, staff associations and the staff forum members HMIC spoke to. Each day was led by a chief officer and involved discussion of ethical dilemmas, including notifiable associations, sexual contact with witnesses, gifts and gratuities, and business interests. The dilemmas were based on anonymised case studies in areas that feature strongly in the counter-corruption control strategy.

The professional standards branch also provides bespoke training and briefings when information suggests that there is a lack of understanding of the expected standards. This was apparent with the substantial influx of new staff in the force's call and dispatch centre. Officers from the branch spent whole shifts across a three-week period in the control room advising staff on appropriate access to police information systems and the use of social media.

The force has a clear position on the abuse of authority for sexual gain and, when proved, officers should expect to be dismissed. The boundaries of acceptable behaviour were made clear in the series of posters involving PC Chancer and during discussions on an ethical dilemma designed to draw out the relevant issues.

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.¹⁶ These findings reflect the research commissioned by the College of Policing, which highlights the importance of taking a problem-solving approach to preventing wrongdoing, by scanning and analysing police data to identify particular officers or hotspots for targeting prevention activity.

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

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

Identifying and understanding risks to integrity

Humberside Police has a good understanding of the potential risks to the integrity of the force. The dedicated counter-corruption unit (CCU) gathers and records intelligence in accordance with authorised professional practice. This means that the force has been able to contribute to the national threat assessment and complete the first draft of a local assessment based on the MoRiLE structure,¹⁷ which identifies both its highest risks and associated intelligence requirements. It uses its control strategy to inform communications and training to prevent breaches of standards and to prioritise intelligence collection and investigation.

Humberside Police has made good progress in implementing the recommendations made by HMIC as part of our 2014 police integrity and corruption inspection¹⁸ concerning business interests, notifiable associations¹⁹ (including media), gifts and hospitality. The force has introduced a clear policy consistent with approved professional practice on the gifts and hospitality that are appropriate for officers and staff to accept and why. This policy is supported by an online registration system to record all gifts and hospitality received within the force. Any submission which is inconsistent with the principles of the policy, such as a gift from a contractor, results in an instruction to refuse the gift or, if already accepted, to book the item into the police property system. An email is also sent to the head of the professional standards branch with details of the staff member who sought to register the item and the reasons for refusal, thereby prompting a review of the circumstances surrounding the offer and any acceptance.

The force has a similarly robust policy and system for the application and review of proposed business interests. A multi-disciplinary group, headed up by the professional standards branch and with representatives from human resources, legal

¹⁷ MoRiLE (Management of Risk in Law Enforcement) is a structured methodology that aims to provide a consistent approach to the assessment of the severity and impact of potential harm caused by crime and incidents across law enforcement agencies.

¹⁸ *Police Integrity and Corruption – Humberside Police*, HMIC, 2014. Available at: www.justiceinspectorates.gov.uk/hmic/publications/police-integrity-corruption-force/

¹⁹ 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.

services, vetting and the corporate development departments, reviews and endorses or rejects all business interest applications, including volunteering. This enables the force to consider the likely hours worked and the potential effect on the organisation, the welfare of staff and any potential risks to the integrity of the organisation. Demanding business interests, such as renting six or more properties, triggers a formal review process.

The force conducts open source research on refused business interests. The force has robust arrangements in place for reviewing vetting as a way of identifying potential risks to the integrity of the organisation. The force has identified the vetting necessary for each post, and vetted all police officers, police staff, contractors and volunteers to the appropriate level.²⁰ Officers and staff with access to confidential and secret material are subject to more intrusive vetting of their personal and financial circumstances in accordance with guidance. The force conducts regular checks after initial vetting to ensure that the vetting approval remains current. Transfers between departments and promotions are also notified to the vetting unit and trigger a review of the individual's vetting status.

The force has the capability to monitor and audit all Humberside Police's information technology systems. It is able to respond to intelligence about the misuse of systems to identify vulnerable victims, or to access and unlawfully disclose operational information and intelligence.

Intervening early to manage risks to integrity

In our 2014 inspection of police integrity and corruption, we recommended that the force put in place systems to gather and act on information that identified a pattern of unprofessional behaviour or corruption. The force has introduced conduct and performance meetings, chaired by the assistant chief officer for human resources and attended by representatives from the professional standards branch, human resources, legal services and occupational health. The meeting looks at individual performance issues, grievances and conduct matters. It provides an opportunity to discuss complex cases – including individuals who may be vulnerable to corruption – and to take action to mitigate any risks. For example, one meeting identified a lack of understanding about data access and confidentiality, particularly among new staff. The professional standards branch then published briefings for training courses and directly to teams to manage any potential future risk.

The force's CCU has oversight of the ongoing covert operations being undertaken by the force. This allows for early identification of any potential corruption links and opportunities to manage those risks.

The force has a notifiable association policy for officers to report any association with people who have adversely come to the notice of the police. Any incidents are

²⁰ The force has not vetted six members of its workforce who are long-term sickness absentees.

researched and assessed to mitigate any corruption. A safeguarding plan is then put in place with the officer to manage any risks to their integrity and any attempts at corruption.

Looking for, reporting and assessing intelligence on potential corruption

The force gathers intelligence about potential corrupt activities from a wide range of sources, including other law enforcement agencies, the public and through internal reporting.

Humberside Police operates an internal confidential reporting system called 'Bad Apple'. Police officers and staff can anonymously notify the CCU of their concerns about an individual or organisational practice through a secure email conversation. There were concerns about the security of the system after a recent court case, and the force acted quickly to reassure officers and staff that the force could not identify people making reports. The positive current rate of reporting through Bad Apple suggests that there is confidence in the system. The force has systems to support officers and staff reporting corruption, including those people who report their own involvement in corrupt activity. An example is the notifiable association policy and the support for those officers.

Incoming intelligence is reviewed on the day it is received to ensure that any urgent items are dealt with immediately. Depending on its priority, intelligence is then entered into the CCU's intelligence system and assessed on the basis of the quality and reliability of the intelligence, any linked intelligence and identified vulnerabilities known about the police subject (for example, complaints and misconduct history, notifiable association reports and registered business interests).

The force has developed a counter-corruption intelligence requirement, which means that it seeks information as part of its local assessment of the threat from corruption. It has recognised that gyms are locations where police officers can come into contact with criminals, and the use of steroids associated with some gyms is a nationally recognised corruption threat. The force has implemented an appropriate plan to gather intelligence from gyms, linked to intelligence reports about potential police corruption.

HMIC's examination of live intelligence reports and investigations demonstrates that the force develops intelligence and progresses investigations in a timely way. The management of the professional standards branch and the deputy chief constable regularly review investigations, resourcing levels and the risks to the organisation. The CCU has access to a range of covert tactics to support its investigations, and uses support from the National Crime Agency when this is both necessary and appropriate. The CCU supports the force by sharing information and acting to ensure the security of other covert investigations carried out by the force crime unit. In response to HMIC's recommendation from the 2014 police integrity and corruption report – to ensure that it has a policy on substance misuse and drug testing to

identify and deter substance misuse – the force has employed an independent company to carry out random and intelligence-led drug and alcohol testing. The force uses its powers to arrest suspected users of controlled drugs. A recent arrest led to the identification of cocaine use from a hair sample, which led to the dismissal of an officer. Officers and staff we spoke to were aware of the random drug and alcohol testing programme.

Humberside Police identify abuse of authority for sexual gain as part of the primary threat to the organisation from corruption or sexual misconduct by police officers and police staff. The abuse of vulnerable people for sexual gain featured in the ethical dilemmas discussed on proactive professional development days and in a series of posters featuring PC Chancer.

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 the Association of Chief Police Officers (ACPO) published *The abuse of police powers to perpetrate sexual violence*.²¹ This report states that “the abuse of police powers for purposes of sexual exploitation, or even violence, is something that fundamentally betrays the trust that communities and individuals place in the police. It therefore has a serious impact on the public’s confidence in individual officers and the service in general.” The report identified this behaviour as a form of serious corruption that forces should refer to the IPCC for its consideration of how it should be investigated.

The *Code of Ethics*²² – 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.²³ HMIC’s 2015 report *Integrity matters*²⁴ identified police sexual

²¹ *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

²² 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

²³ 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

misconduct as an area of great concern to the public. We share the public's disquiet and so we looked at this issue specifically as part of our 2016 inspection. Our work was given additional emphasis in May 2016 by a request from the Home Secretary that we inspect forces' response to the issue of officers and staff developing inappropriate relationships with victims of domestic abuse and abusing their position of power to exploit victims.

Recognising abuse of authority for sexual gain as serious corruption

Humberside Police recognises the threat posed by officers and staff abusing their position for sexual gain. When the force has dealt with such cases, it identified them as being serious corruption. The primary criminal offences were fully investigated and where applicable these included the offence of misconduct in a public office. The cases were all referred to the IPCC as required.

Known risks to the integrity of the force are assessed and graded in the force strategic counter-corruption threat assessment. The current assessment identifies the abuse of authority for sexual gain as a priority risk for the force. As such, it is also identified as a priority in the current intelligence requirements of the counter-corruption control strategy.

We found that messages regarding inappropriate forming of relationship with vulnerable victims had been circulated throughout the organisation. These included ethical dilemma training involving the 'PC Chancer' character and inputs on training courses and leadership development days, clearly demonstrating how seriously the force takes this issue.

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

Humberside Police has recognised the substantial threat to its reputation from sexual misconduct by officers. They obtain counter-corruption intelligence from a good range of sources, but have identified the need to work better with women's refuges and sex worker support groups. By doing this, they will ensure that the staff who work in those agencies and their clients know whom to notify if they are concerned about the behaviour of police officers. Obtaining information in this area is now included as a priority in the counter-corruption intelligence requirements.

The force has the capability to monitor all force systems and so identify staff who may be using them to search for vulnerable people. It also allows them to recognise patterns in officer workload which suggest the potential targeting of such individuals

three years of intelligence reports on possible corruption gathered by forces in England and Wales, supplemented by information from other forces and national agencies.

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

and inappropriate use of social media such as dating apps and online forums, which again may be indicators of inappropriate behaviour.

They take a robust stance once information is brought to their attention. Such investigations are conducted by the force's dedicated counter-corruption unit, examples of which were shown to the inspectors. One recent investigation involved an officer who had been found taking images of women while on duty on force equipment and then downloading them to personal IT equipment. This investigation resulted in the officer being found guilty of gross misconduct and dismissed from the force.

Taking action to prevent abuse of authority for sexual gain

The force has educated its staff about the standards of professional behaviour and provided guidance around the abuse of authority for sexual gain. The professional standards department (PSD) has provided advice and guidance through a variety of channels, including presenting to learning and development courses and staff leadership days, jointly with the Police Federation and staff associations. A 'common issues' leaflet was produced which included information on sexual misconduct; this was circulated widely across the force. PSD regularly produces a bulletin entitled 'Behind the Headlines', one of which focused specifically on lessons learned from the case involving the officer who was dismissed for taking photographs of women on force equipment. Sexual misconduct has also featured in the ethical dilemma training involving PC Chancer, which was well known across the force.

The deputy chief constable has given presentations to over 1,000 staff members regarding the standards of behaviour expected from staff, including the abuse of authority for sexual gain, using real examples to enforce the message. This clarifies the boundaries for staff and ensures that they appreciate how seriously the force takes this issue.

Building public trust

Hearings involving incidents of gross misconduct by police officers are held in public. Prior to any hearing, details are published on the force website. The press are invited along and report freely on the hearings, demonstrating to the public how robustly Humberside Police deals with such issues when they come to light.

Full internal reviews are conducted of any cases to ensure all the facts are understood and any learning for the force identified.

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.²⁵ This information also forms the basis for deterring misconduct and enhancing integrity within police forces themselves. This year, HMIC looked at how well forces engage with the public online and through police officer misconduct hearings in public, and also more widely following high profile incidents with the potential to undermine public perceptions of police integrity. We also looked at how aware the workforce is of these outcomes.

Working with the public

Humberside Police tells the public about the misconduct process and publicises the outcome of misconduct cases. The force advertises the dates and locations of misconduct hearings on its website. The website provides brief details of the allegations and the various sanctions available to the panel. It then provides details of the outcomes. The force monitors attendance and recognises that hearings are sometimes attended by journalists and affected members of the public. It has sought to involve the wider public by streaming the proceedings to more accessible locations, such as a local police station. Despite advanced publicity, this approach has only resulted in limited public attendance.

The force regularly updates its website with details of gifts and hospitality received by police officers and police staff, and the business interests of senior officers.

The force recognises the impact that high-profile misconduct cases have on both the public and the workforce. The force prepares a media strategy to inform the public of the case and its outcomes. It recognises the impact that some misconduct outcomes can have on the workforce. For example, in one case an officer was dismissed. A chief officer attended the team briefing to update officers and reinforce the standards of the force.

Working with the workforce

The force recognises the importance of working with its officers and staff to improve standards of behaviour. Misconduct outcomes are included in a regular publication *Behind the Headlines*. This used to be a brief summary of the circumstances, misconduct outcome and sanction. Officers asked for more information about what

²⁵ *Literature review – Police integrity and corruption*, HMIC, January 2015. Available at: www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/

went wrong and why, after a death in custody. The force now includes greater detail about the learning in each case. It notifies staff of the circumstances and behaviours that resulted in a meeting or hearing, and its outcome.

Lessons learned are communicated in the form of changes to policy and guidance. For example, an investigation into the death in custody resulted in a review and publication of those lessons. In high-profile cases, where colleagues have been dismissed, senior officers attend team briefings to outline the standards of behaviour expected and the consequences of not adhering to them.

Summary of findings



Good

The force has a robust vetting process. All officers, staff contractors and volunteers are vetted to the designated standard and subject to regular reviews, as well as on change of role or promotion. The force uses a range of methods to clarify and reinforce standards of behaviour. Most resonant among staff have been the proactive professional development days focused on discussion of ethical dilemmas.

The force has a good understanding of local and national corruption threats, and these have informed its intelligence requirements and prevention activities. It has a good range of approaches to intelligence gathering. Intelligence is evaluated promptly, recorded in line with approved practice and developed in a timely fashion.

The force is not undertaking proactive intelligence gathering with women's refuges, sexual health clinics and charities supporting sex workers to identify potential corruption and encourage reporting of inappropriate behaviour. The force publicises misconduct hearings for police officers and police staff, and shares the outcomes internally with staff and on its website.

The force has addressed all five recommendations made by HMIC following our police integrity and corruption inspection in 2014.

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.²⁶ 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.²⁷ 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.

²⁶ *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

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

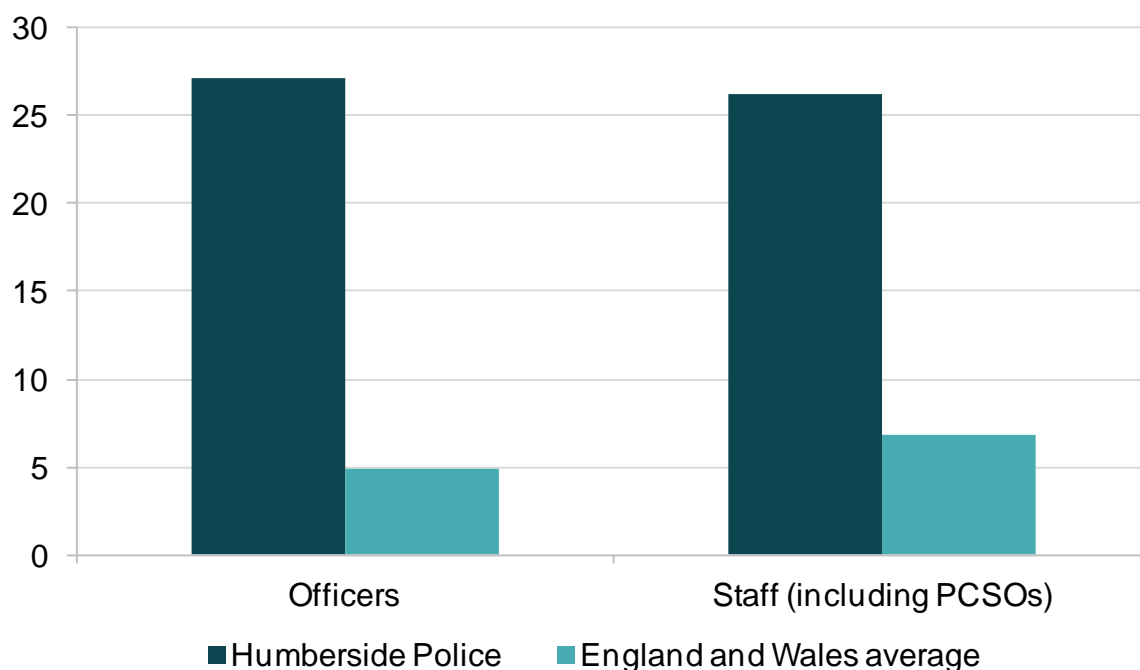
²⁷ *Fair cop 2: Organisational justice, behaviour and ethical policing*, College of Policing, 2015, page 11. Available at:

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

Identifying and understanding the issues

Grievances are concerns, problems or complaints raised formally with 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 Humberside Police finalised compared with England and Wales, in the 12 months to 31 March 2016



Source: HMIC Legitimacy data collection

Note: Humberside Police records as finalised grievances all contact received from members of its workforce who report that they have grounds for a grievance, including contact that was rejected or where advice and guidance was offered. For further information about the data in figure 3 please see annex A

In the 12 months to 31 March 2016, Humberside Police finalised 27.2 formal grievances raised by officers per 1,000 officers, which was higher than the England and Wales average of 4.8 per 1,000 officers. During this period, the force finalised 26.2 formal grievances raised by staff per 1,000 staff (including PCSOs), which was higher than the England and Wales average of 6.8 per 1,000 staff (including PCSOs).

In addition to the grievance system, Humberside Police has a range of formal and informal methods to identify issues that affect the workforce's perceptions of fair and respectful treatment.

A staff survey was undertaken in summer 2015 by the OPCC, completed through five smaller surveys to collect the views of the workforce in stages, across the force.

The survey looked at attitudes and perceptions of staff. It covered ten areas including reward and recognition, performance and fairness, communications, improvements in service provision and the force as an employer.

The force has not published the information it gathered from the staff surveys that had been commissioned by the OPCC. It has communicated some details of how the information gathered by the survey had changed areas in the format of, 'You said, we did...', but it could have done more with the information to show the workforce how its feedback was being used to make improvements.

A quarterly human resources meeting reviews a range of subjects and management information, including sickness absence, skills, recruitment and selection, and workforce planning to identify issues of concern. There is also a diarised meeting structure with staff associations and unions at which concerns can be raised and discussed with the chief officer team.

HMIC was told that chief officers had attended proactive professional development days to give presentations on standards and the Code of Ethics, and had been accessible for the workforce to feed back informally to senior leaders. The force also used formal consultation processes to consider the views of the workforce and suggestions for the implementation of the shift system in February 2016. The force continues to seek feedback, which will be considered in the review of the shift system.

The force has a staff forum, which is an important part of the Humberside communication structure for identifying and understanding the perceptions of the workforce. The forum's membership includes staff associations, unions and support networks, which are consulted on fairness and respect issues for the force. The members are asked to suggest and develop areas that could be improved by the force. The group also has a first contact scheme for anyone to raise issues to be discussed at the forum and with chief officers.

During the inspection, HMIC found that the force had a good working relationship with unions and staff associations, with both listening to the views and concerns of the other, and being able to work together for the benefit of the workforce and the organisation.

HMIC did hear some frustrations, with officers sometimes being unable to book annual leave in a timely way. Because of the implementation of the new shift system, the force had been careful to make sure that annual leave was equitable among teams to manage and balance resource levels and availability. The process for requesting annual leave was centrally managed, and delays in decision making were causing officers and staff frustrations in trying to secure leave in a satisfactory way.

Making improvements and demonstrating effectiveness

The force listens to staff concerns and consults with them before making changes. An example of where the force has taken action in response to feedback from the workforce is the issue of 'reward leave'. The force policy is to reward good attendance, when there has been no absence for 12 months, with an extra day's leave. This resulted in a considerable and increasing amount of annual leave being owed to staff. A number of staff were saving excessive leave days to take as a long period of leave, which could impact on service delivery and resource availability. The force needed to change the policy to prevent a continued build-up of leave. It had provided options for the workforce to consider about reducing the leave with a change in policy for it to be taken in that year. After consultation with the workforce through staff associations and trade unions, an agreement was reached to the satisfaction of all parties.

The force has a process for its workforce to make suggestions to improve effectiveness. The programme, Go and Make a Difference (GoMAD), allows the workforce to make suggestions for improvements and, if agreed, to see a project through to implementation from their original idea. HMIC found that the workforce generally felt that the force was encouraging them to improve and be innovative with their ideas and suggestions. For example, a sergeant in the youth offender team realised that the young offender form was not fit for purpose and could lead to the wrong outcome, so she changed the form and it has now been adopted in Humberside.

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

Police forces need to understand the benefits of having a healthier workforce – a happy and healthy workforce is likely to be a more productive one, as a result of people taking fewer sick days and being more invested in what they do. Last year our inspection was concerned with what efforts forces were making to consider, and provide for, the wellbeing needs of their workforce. This year we looked at the progress the force had made since the last inspection, with a particular focus on preventative activity to encourage wellbeing.

Understanding and valuing the benefits

Humberside Police takes the wellbeing of its workforce seriously. Humberside Police has demonstrated that it values workforce wellbeing in a variety of ways.

During the inspection, HMIC found that the workforce was aware of the services the force had put in place for their wellbeing and recognised that the chief officer team valued its people through the changes it had made to the wellbeing programme. The force has reviewed its wellbeing provisions and visited other forces to identify good practice or extra provision that could be considered for Humberside Police.

The force has a programme called 'well together', led by the deputy chief constable, which includes a review of the benefits of wellbeing and the wellbeing capacity in the force. The review has resulted in an increase in occupational health unit (OHU) staff and a health provision development plan for the force, which contains the service standards that are expected from the OHU.

The force has shown its commitment to wellbeing by registering with the Workplace Wellbeing Charter run by NHS England. It has started working towards charter accreditation by completing a gap analysis and is working to achieve the wellbeing charter by evidencing its services.

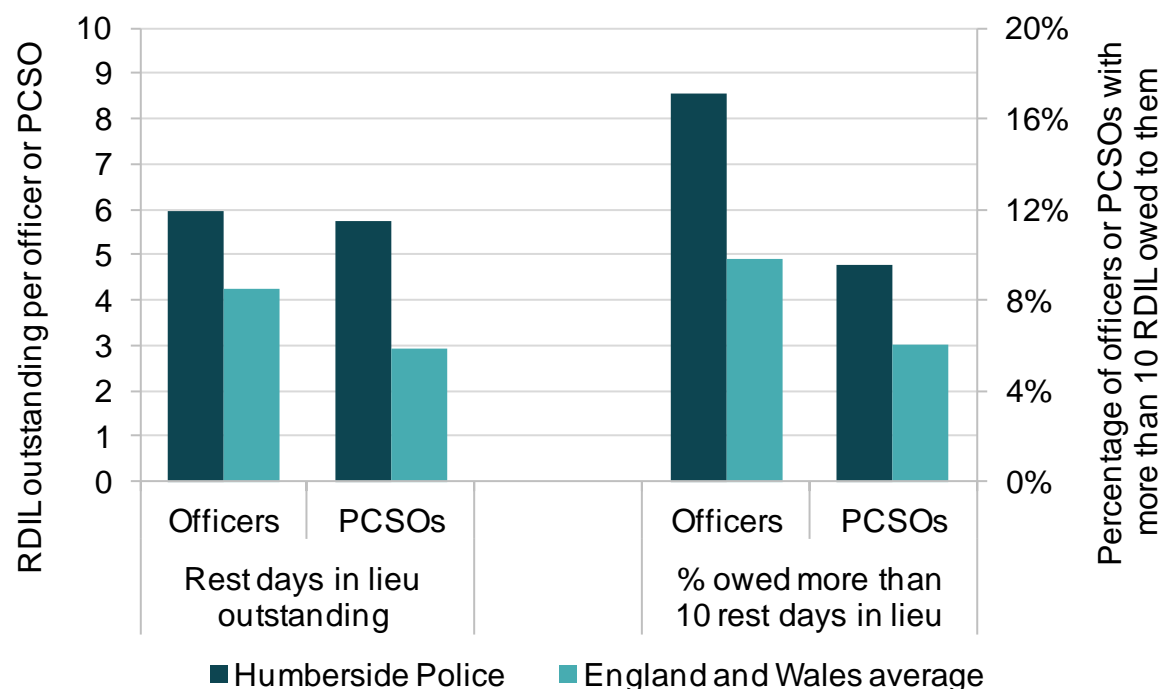
The force is also working towards attaining the professional qualification for occupational health: Safe, Effective, Quality Occupational Health Service (SEQOHS). It has developed a clinical governance policy, internal complaints policy and professional supervision policy for the OHU. These documents underpin the service level agreement and are also essential requirements for obtaining SEQOHS.

Identifying and understanding the workforce's wellbeing needs

The force gathers and analyses information from a number of sources to gain a better understanding of wellbeing needs. For example, it analyses force data, such as sickness absence and OHU referrals, as well as seeking the views of the workforce about their personal wellbeing through the staff survey. The force analyses the data and reviews within the well together programme.

Rest days in lieu (RDIL) are leave days owed to officers or PCSOs when they have been required to work on their scheduled rest day for operational reasons. Long working hours can have a detrimental impact on the health and well-being of the workforce, so it serves as a useful point of comparison for assessing the extent to which the force is managing the well-being of its workforce. Analysis of the numbers of RDIL accrued, but not yet taken, can be a useful tool for forces to identify and understand potential well-being 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 Humberside Police compared with England and Wales, as at 31 March 2016



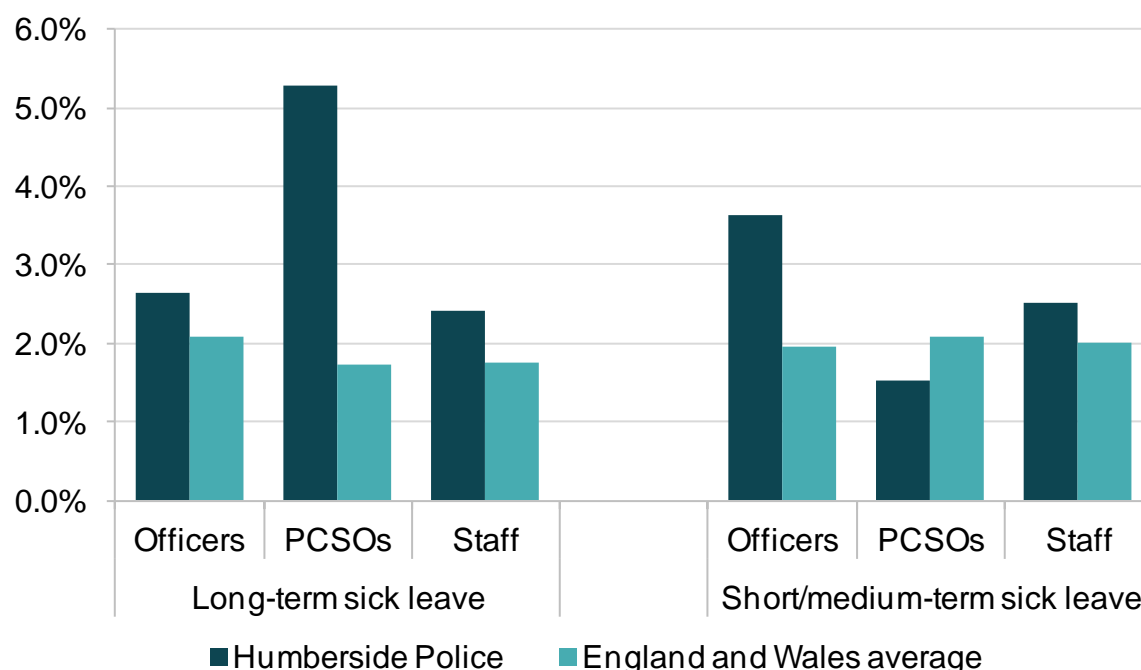
Source: HMIC Legitimacy data collection

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 5.9 rest days in lieu outstanding per officer in Humberside Police, which was broadly in line with the England and Wales average of 4.2 days per officer. On the same date, there were 5.7 rest days in lieu outstanding per PCSO in the force, which was higher than the England and Wales average of 2.9 days per PCSO. As at 31 March 2016, 17.1 percent of officers in Humberside Police had more than 10 rest days in lieu owed to them, which was higher than the England and Wales average of 9.8 percent. As at 31 March 2016, 9.6 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 also provide a useful point of comparison for assessing the well-being 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 Humberside 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.

- 2.6 percent of officers were on long-term sick leave, which is higher than the England and Wales average of 2.1 percent.
- 3.6 percent of officers were on short or medium-term sick leave, which is higher than the England and Wales average of 2.0 percent.
- 5.3 percent of PCSOs were on long-term sick leave, which is higher than the England and Wales average of 1.7 percent.
- 1.5 percent of PCSOs were on short or medium-term sick leave, which is broadly in line with the England and Wales average of 2.1 percent.
- 2.4 percent of staff were on long-term sick leave, which is higher than the England and Wales average of 1.7 percent.
- 2.5 percent of staff were on short or medium-term sick leave, which is broadly in line with the England and Wales average of 2.0 percent.

The force's human resources quarterly meetings review sickness absence trends and service provision, such as the waiting times for the OHU and the levels of psychological support and training provided to supervisors.

Taking preventative and early action to improve workforce wellbeing

The force has a series of products and initiatives to support the workforce at all times of the day and night, including provision of early help to stop wellbeing problems from escalating.

During our inspection we found that the OHU had been visiting departments with the highest rate of sickness absence to review wellbeing, identify issues that may have been contributing to problems and offer solutions through drop-in centres.

We also found that supervisors are adequately prepared and supported in their wellbeing responsibilities. The force provides training for supervisors so they can manage sickness absence and support the workforce. So far, the force has delivered 77 training sessions to 363 supervisors.

The force has expanded its wellbeing provision and undertaken a number of roadshows across the force to raise awareness of wellbeing issues and the services the force has in place to support its workforce. The force provides both psychological support and counselling services and the workforce have good access to these, and the force's chaplaincy service. The force has also provided support for those staff who had been affected by the force's revised policy on flexible working, which had resulted in changes to workforce working arrangements.

The force has an early assistance programme that provides confidential support seven days a week for all staff and family or partners. This service provides advice and support on all wellbeing issues, such as alcohol, mental health, bereavement and debt.

The force funded ten teams of staff to enter the 100-day global corporate challenge, to motivate the workforce to take control of improving their health and wellbeing. The challenge sees teams setting wellbeing goals, such as increased fitness, weight loss and stopping smoking, and the fitness and wellbeing team tracks their progress.

The force has mental health champions across the force who have been trained to support the mental health and wellbeing of colleagues across the force area. The force has five staff peer-to-peer supporters trained through the mental health charity MIND's blue-light programme who are available to help colleagues and people who suffer from mental health issues.

Counselling is mandatory for the officers and staff working within those roles that involve considerable risks to people's wellbeing, such as those involved in child protection or viewing abusive images. We found several examples where the workforce had recognised when someone needed support and had arranged that

support for their colleague, including overcoming initial resistance to ask for help. More generally, the introduction of supportive management action plans (SMAPs), with supervisor discretion as to how they are applied, had been well received by staff.

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.²⁸ 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.²⁹

The performance assessment process

Humberside's current individual performance assessment process (referred to as PDR) is ineffective. There has not been consistent compliance with the PDR process and HMIC found several staff who had not had a PDR for several years. The force told HMIC that the compliance rate for the previous year had been 42 percent.

The force has collaborative arrangements with South Yorkshire Police and will launch a new electronic PDR (ePDR) in June 2016. The force recognised that the old PDR system was ineffective in terms of both developing individuals and being fair to all officers and staff. Compliance with the assessment process was either individually managed by the member of staff seeking a PDR or dependent on the supervisor pursuing the process, rather than being promoted organisationally to develop individuals and improve capability to provide policing services.

The new system will provide email reminders to both line manager and candidate when the PDR is due for review or completion. It is made up of mandatory objectives, a continuing professional development plan and review, and an end-of-year rating for each staff member. The force seeks to change the culture towards PDR from an end-of-year review to an ongoing review of performance. It has included and consulted all staff in the development of the new PDR, and has also taken account of results from the previous staff survey.

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

http://whatworks.college.police.uk/Research/Documents/150317_Fair_cop%20FINAL_REPORT.pdf

²⁹ College of Policing guidance on the police performance development review process is available at: www.college.police.uk/What-we-do/Support/Reviewing-performance/Pages/PDR.aspx

Humberside Police plans to use the PDR and leadership groups to identify trends and gaps in leadership, and to develop activities to address those gaps. For instance, emotional intelligence has been identified and raised by supervisors and managers as a skills gap. The careers development department has arranged training events that are open to all staff and are advertised on the force intranet.

The results of performance assessment

As a large number of the workforce have not had their performance reviewed or been given the opportunity to seek development through a formal process, HMIC heard that staff were not happy with the current PDR process and its results.

The force has recognised that there has been an under-investment in the training and development of its staff. It has built a professional practice development day into the system to allow the force to provide valuable training and improve the performance of its operational officers. For example, the force has run training on child sexual exploitation, domestic abuse and missing from home enquiries. HMIC heard from the workforce that the professional development days and the training had been well received.

The force has an unsatisfactory performance procedure (UPP) in line with the Police Performance Regulations 2012. It publishes the procedure and provides support to supervisors on the guidance and process. The force has a number of its workforce at different stages of the UPP.

The force recognises the good work of its workforce and has a programme of reward and recognition, such as department and force commendations, to recognise good work and performance.

Summary of findings



Requires improvement

Humberside Police uses various methods to identify issues that affect the workforce's perceptions of fair and respectful treatment, including a staff forum for identifying concerns. However, the force could do more to show how it understands issues that affect the workforce, and how feedback has been used to make improvements.

The force understands the benefits of workforce wellbeing and shows a commitment to it – including mental wellbeing – through a range of wellbeing provision, including intervening early to prevent problems from escalating by providing additional training for supervisors on their wellbeing responsibilities.

The force's PDR system is limited and not used consistently by the workforce. HMIC found several staff who had not had a PDR for several years. The force launched a new electronic PDR system (ePDR) in June 2016. The force also has unsatisfactory processes for tackling poor performance within the workforce. The force has previously under-invested in staff professional development linked to performance although the introduction of a professional practice development day, and ongoing review of performance, aims to improve the performance of its operational officers.

Area for improvement

- 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.³⁰

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

³⁰ *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