



Promoting improvements
in policing to make
everyone safer

PEEL: Police legitimacy 2016

An inspection of Norfolk Constabulary



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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 Norfolk Constabulary.

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

Force in numbers



Workforce

Total workforce as of 31 March 2016

2,708

Total workforce breakdown as of 31 March 2016

officers

1,515

staff

1,023

PCSOs

171



Ethnic diversity

Percentage of BAME in workforce 31 March 2016

overall workforce

1.6%

officers

1.8%

staff

1.3%

PCSOs

1.2%

Percentage of BAME in local population, 2011 Census

3.5%



Gender diversity

Percentage of females in overall workforce 31 March 2016

40%

England and Wales population, 2011 Census

51%

Percentage of females by role 31 March 2016

Norfolk Constabulary

officers

27%

staff

58%

PCSOs

44%



Public complaints

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

Officers

Norfolk Constabulary

242

England and Wales force average

268

Staff (including PCSOs)

45

61



Grievances

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

Officers

Norfolk Constabulary

0.0

England and Wales force average

4.8

Staff (including PCSOs)

6.7

6.8



Victim satisfaction

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

Norfolk Constabulary

95.8 %

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

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

The force treats the public and its workforce with fairness and respect. It ensures its workforce demonstrates ethical and lawful behaviour. A wide range of wellbeing services support the workforce.

Overall summary

Norfolk Constabulary is good at treating the people it serves with fairness and respect. The force has a strong ethical culture that the workforce understands. It seeks feedback and challenge using local media, rural newsletters, social media, the police connect messaging system (through which the public can receive updates relevant to where they live), live web chats by chief officers, the force website, traditional links with local parish and district councils and local public engagement. The force also seeks feedback from those groups with less trust and confidence in the police, and makes use of the independent advisory group and independent custody visitor scheme, as well as liaison officers.

The force makes improvements based on the feedback it receives. For example, it has changed its guidance on the use of stop and search based on feedback on perceptions of fairness from the public and the independent stop and search scrutiny panel. It recognised an increase in the number of complaints from people with autism and now has a learning package to help the workforce understand autism and adapt their approach. The force has responded to the concerns raised by rural communities and has introduced a rural crime team using members of the Special Constabulary on horses and all-terrain vehicles to increase its visibility in remote areas.

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

Norfolk Constabulary is good at ensuring that its workforce behaves ethically and lawfully. The force vets all people joining the organisation. It gives specific and detailed guidance on gifts and hospitality, notifiable associations, use of social media, information security and standards of behaviour. It also highlights lessons learnt from recent public complaints and misconduct investigations. The force uses a range of techniques to identify individual and organisational risks, including monitoring its own internal computer systems as well as open source information on social media.

The force recognises abuse of authority for sexual gain (taking advantage of a position of power to exploit vulnerable victims of crime) as serious corruption. It is preparing its workforce, and partner organisations who support vulnerable victims, to recognise the signs of inappropriate relationships or behaviour.

Norfolk Constabulary is good at treating its workforce with fairness and respect. It uses the Ask the Chief email facility (which can be used anonymously), web chats with chief officers, staff leadership forums and seminars, online blogs by senior officers, specific forums and various staff focus groups to seek the views of its workforce. The force listens to the concerns raised by staff and takes action to address them. At the time of the inspection, it had plans to conduct a survey later in 2016 to better understand the views of the entire workforce.

The force is good at identifying and understanding the workforce's wellbeing needs. It offers a wide range of wellbeing services, which it is looking to develop further by providing mobile health screening and occupational health drop-in centres. It is also taking preventative and early action to improve workforce wellbeing, through proactive work to raise awareness of stress and mental illness and holding workshops for staff to help them identify stress factors in themselves and others. However, the force needs fully to understand and take appropriate action to address the high levels of short- and medium-term sickness among officers and staff.

The force has made good progress in responding to last year's findings and recently implemented a new way of assessing staff performance.

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 demonstrates that it has taken action to improve how it treats all the people it serves.
- The force should ensure it complies with all aspects of the current national guidelines for vetting.
- The force should improve how it clarifies and reinforces standards of behaviour to its workforce, in particular when dealing with vulnerable people including victims of domestic abuse.

To what extent does the force treat 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 demonstration 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

Norfolk Constabulary has a good understanding of the importance of treating the people it serves with fairness and respect. There is a strong culture of ‘doing the right thing’ and this is understood by the workforce. The force has recently consulted

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.*

with staff and revised its 'vision and values', which incorporates the Code of Ethics,⁶ to make it more meaningful for those operating within collaborated units across both Norfolk and Suffolk and reflect better the priorities of the police and crime commissioner's (PCC's) Police and Crime Plan.⁷ During our fieldwork we spoke with a wide range of staff, including frontline and business support staff, and found a good understanding of the importance of treating the public with fairness and respect, and of the impact of their behaviour on public confidence.

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

Norfolk Constabulary is good at seeking feedback and challenge from the people it serves. It uses a range of techniques to seek the views of the public and a number of innovative ways to engage with communities with less trust and confidence in the police. The force frequently gains independent feedback and challenge through a range of formally established groups. These include the independent advisory group and the independent custody visitor scheme which concerns itself with the treatment of people who are detained in custody. Such groups give a voice to those less likely to complain or take part in traditional forms of engagement.

Norfolk Constabulary is also using a number of ways to build relationships with groups with less trust and confidence in the police and uses diversity liaison officers to build positive relationships with those who are less likely to take part in traditional forms of engagement. The dedicated Roma, Gypsy, Roma and Travellers liaison officer is working with a charity to engage with these communities to improve relationships and encourage reporting of hidden crimes such as domestic violence. The force uses the Police Cadet Scheme to help change the perceptions of policing

⁶ The Code of Ethics has been produced by the College of Policing in its role as the professional body for policing. It sets and defines the exemplary standards of behaviour for everyone who works in policing. *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

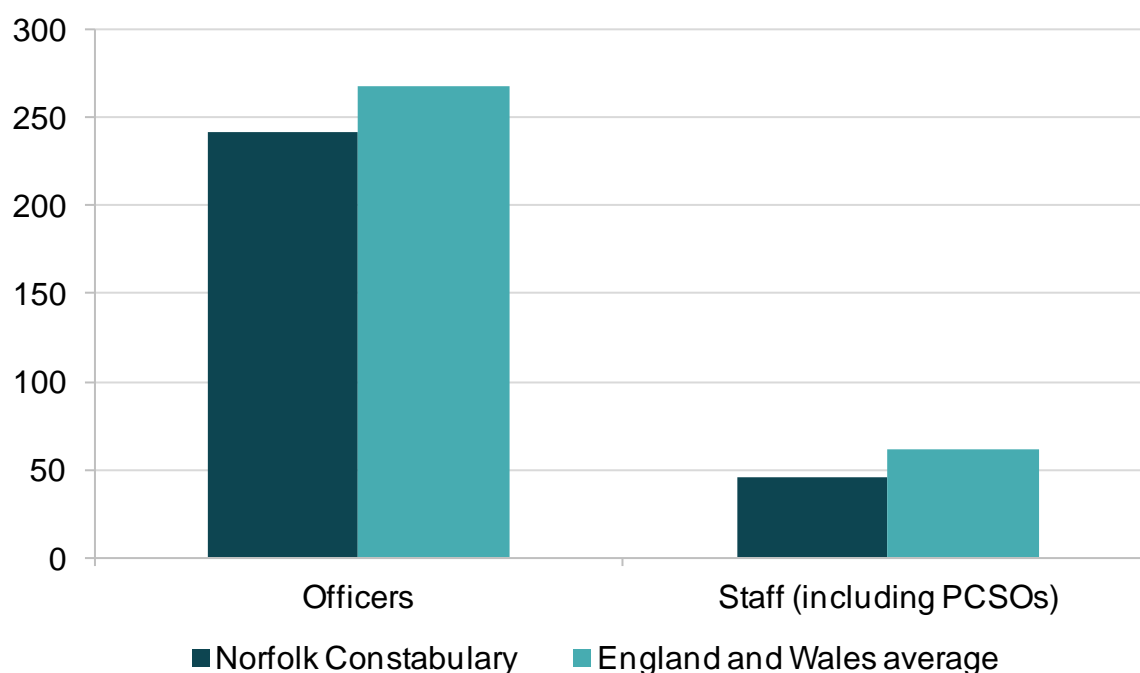
⁷ Norfolk and Suffolk forces work closely together through several collaborated teams. Officers and staff from both forces work alongside each other in areas such as human resources, finance, firearms and roads policing.

among young people, and local engagement officers work with the community to listen and respond to their concerns. The force recognises the increasing Eastern European population within the county and has recruited members of it into the Special Constabulary to help Norfolk Constabulary gain a greater understanding of the concerns within these communities; it also uses targeted social media to effectively engage with them.

Identifying and understanding the issues

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

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



Source: HMIC Legitimacy data collection

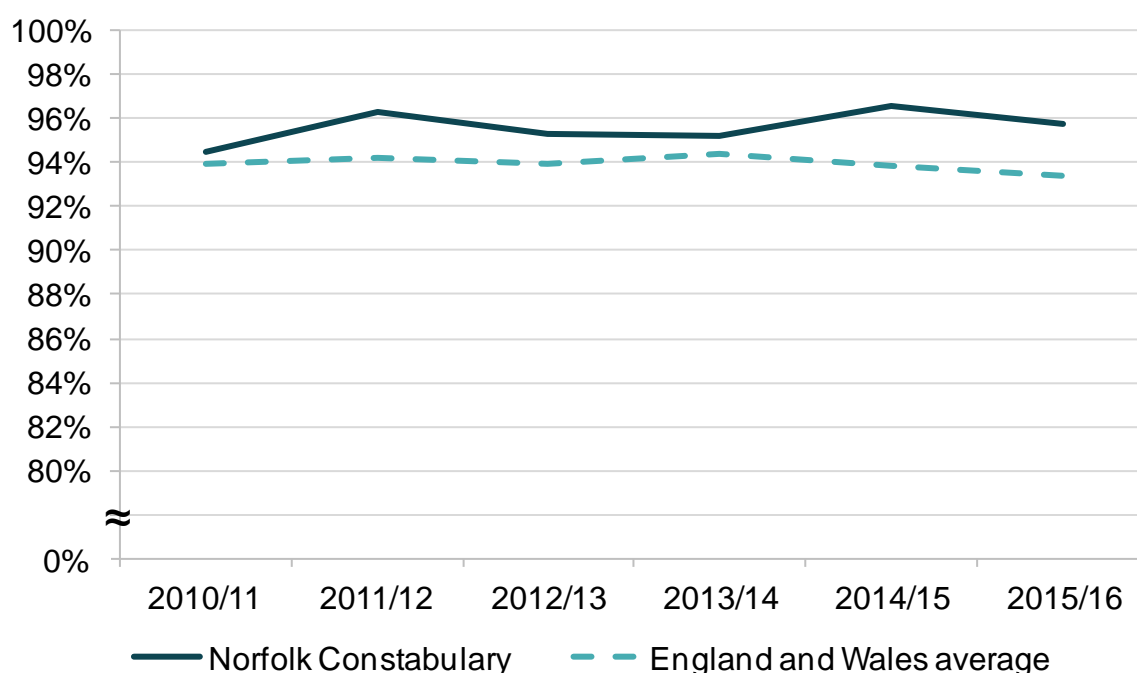
For further information about the data in figure 1 please see annex A

In the 12 months to 31 March 2016, Norfolk Constabulary recorded 242 public complaint cases per 1,000 officers, which was broadly in line with the England and Wales average of 268 cases per 1,000 officers. During this period, the constabulary recorded 45 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 Norfolk Constabulary are ‘other neglect or failure in duty’, ‘oppressive conduct or harassment’ and ‘other assault’.⁸ It is important to note, however, an issue identified during our 2014 inspection on police integrity and corruption:⁹ 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.

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 Norfolk Constabulary compared with England and Wales, from the 12 months to 31 March 2011 to the 12 months to 31 March 2016



Source: Home Office Annual Data Requirement
For further information about the data in figure 2 please see annex A

⁸ Independent Police Complaints Commission data is available at:
www.ipcc.gov.uk/reports/statistics/police-complaints/police-performance-data

⁹ *Integrity matters*, HMIC, January 2015. Available from:
www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/

In the 12 months to 31 March 2016, 95.8 percent of all victims of crime (excluding hate crime) who responded to the victim satisfaction survey were satisfied with the overall treatment provided by Norfolk Constabulary, which was higher than the England and Wales average of 93.4 percent; and lower than the 96.6 percent who were satisfied with the overall treatment that the constabulary provided in the 12 months to 31 March 2015, this is not a statistically significant difference.

Norfolk Constabulary has a good understanding of the issues the public consider important regarding fair and respectful treatment. The joint Norfolk and Suffolk Constabulary professional standards department analyses public complaints to identify trends and support the force in taking action to improve the service it provides and maintain public confidence. As a recent example, the force analysed public complaints and recognised an increase in the number of complaints from people on the autism spectrum.

The force also uses the independent stop and search scrutiny panel (ISSSP) to help identify issues relating to fair and respectful treatment and invites its members on patrol as 'lay observers' to witness officers interacting with members of 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

Norfolk Constabulary is good at making improvements based on the feedback it receives from the public and has responded positively to the recommendations HMIC made concerning the force's use of Stop and Search from last year's inspection.

Last year we found that 14 out of the 99 Stop and Search forms examined did not record sufficient reasonable grounds, suggesting that officers did not understand fully what constitutes reasonable grounds. The force has taken good steps to improve this and now involves the independent stop and search scrutiny panel (ISSSP) to assess independently the quality of stop and search forms from a public perspective and decide whether they include the recording of sufficient reasonable grounds. The force has also changed its guidance on the use of stop and search based on feedback concerning perceptions of fairness from the public and the independent stop and search scrutiny panel. It now instructs staff that the 'smell of

cannabis' alone is no longer sufficient grounds and that other factors would be needed to justify the use of the tactic.

The joint professional standards department recognised an increase in the number of complaints from people on the autism spectrum. Working with the charity Autism Anglia, the force has developed a learning package to help the workforce understand autism and adapt their approach to the needs of individuals, ensuring that they feel respected and treated fairly. The force has also responded to the feedback provided by its disability board and has introduced the Norfolk Safer Places Scheme across the county. This provides people with autism and other disabilities somewhere to go if they feel threatened when out in public and highlights the vulnerability of those seeking assistance to attending officers.

Norfolk Constabulary has responded to the concerns raised by rural communities, who often feel vulnerable and perceive that police resources are unfairly allocated so that they receive insufficient support. As a result, the force has introduced a rural crime team using members of the Special Constabulary on horses and all-terrain vehicles to increase its visibility in remote areas, and improve the way rural communities feel treated by the police.

Demonstrating effectiveness

Norfolk Constabulary is good at demonstrating it has taken effective action in relation to specific groups in response to feedback. However, it could do more to demonstrate to the wider public how it is responding specifically to concerns about fair and respectful treatment.

The force uses a range of methods to engage regularly with the public and provide feedback on the action it has taken. These methods include use of local media, rural newsletters, social media, the police connect messaging system (which allows members of the public to receive updates relevant to where they live), live web chats by chief officers, an email facility on the force website, traditional links with local parish and district councils and local public engagement. The force continues to develop ways to work with communities which are less likely to complain or take part in traditional means of engagement; these methods are co-ordinated at the force level through the force diversity team. Local arrangements include work with Gypsy, Roma, Traveller and Eastern European communities. While the force undertakes a considerable amount of work with the different communities it serves to improve the service it provides, it could do more to update the wider public on what it has done in relation to issues concerning fair and respectful treatment.

Summary of findings



Good

Overall Norfolk Constabulary has a good understanding of the importance of treating the people it serves with fairness and respect. The force has a strong culture of 'doing the right thing' that the workforce understands, and has recently revised its vision and values to further support its approach. It seeks feedback and challenge from the people it serves using a range of techniques and continues to reach out to communities with less trust and confidence in the police.

The force has a good understanding of the issues that have the greatest effect on public perceptions of fair and respectful treatment and has made good progress since last year's inspection in relation to its use of stop and search.

Norfolk Constabulary has demonstrated that it listens to feedback provided by the public and responds by making changes in how it operates to improve continually the service the force provides. While the force is good at demonstrating what it has done to specific groups, it could do more to demonstrate to the wider public how it is responding specifically to concerns about fair and respectful treatment.

Areas for improvement

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

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

In 2014, HMIC inspected the extent to which the police were acting with integrity and guarding against corruption.¹⁰ 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.¹¹

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.¹² 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.

¹⁰ *Integrity matters*, HMIC, January 2015. Available from:
www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/

¹¹ *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

¹² *Promoting ethical behaviour and preventing wrongdoing in organisations*, College of Policing, 2015. Available at:
http://whatworks.college.police.uk/Research/Documents/150317_Integrity_REA_FINAL_REPORT.pdf
and *The role of leadership in promoting ethical police behaviour*, College of Policing, 2015. Available at:
http://whatworks.college.police.uk/Research/Documents/150317_Ethical_leadership_FINAL_REPORT.pdf
and *Literature review – Police integrity and corruption*, HMIC, January 2015. Available at:
www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/

Initial vetting

Norfolk Constabulary has effective vetting processes in place, through its joint vetting unit shared with Suffolk Constabulary, to ensure that it recruits ethical officers, staff and volunteers.

The force's vetting process mostly complies with current national police vetting policy and the force will adopt the new codes of practice once they are published¹³. The current vetting process ensures that the force recruits officers, staff and volunteers with high standards of ethical behaviour. Any deviations from the national standards are assessed against risk, with appropriate oversight by the head of the joint professional standards department.

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

Clarifying and reinforcing standards of behaviour

Norfolk Constabulary has effective processes in place to clarify and reinforce on a regular basis what it considers to be acceptable and unacceptable standards of behaviour among its workforce. Staff we spoke with considered the current chief officer team to be good role models of ethical behaviour and felt comfortable that they could challenge inappropriate behaviour in the workplace and would be supported by the force in doing so. They were aware of, and felt confident in using, the confidential reporting system available to staff who wish to remain anonymous and we found evidence of it being used. The force also has a joint ethics committee with Suffolk Constabulary chaired by a chief officer. This forum is well attended by leaders across the organisation and is used to identify ethical issues either raised by or affecting the workforce and guidance is provided to ensure the organisation maintains an ethical culture. The force is aware that it needs to improve awareness of this group among the workforce to improve engagement.

Ethical issues are explored even before people join the organisation as part of their application process. The joint professional standards department provides structured information to student officers, police community support officers and Special Constables on acceptable behaviour within the police service. The chief constables of Suffolk and Norfolk have produced a document called 'Integrity: what you need to

¹³ 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.

know', which was provided to all staff. This provides specific and detailed guidance on: gifts and hospitality, notifiable associations, use of social media, information security, and standards of behaviour¹⁴. The joint professional standards department has adopted a learning rather than a punitive approach to setting and reinforcing ethical standards of behaviour and regularly produces a document that highlights lessons learnt from recent public complaints and misconduct investigations. This is widely distributed across both forces and is supplemented by a specific briefing for sergeants. These documents were recognised and understood by most of the people we spoke with. Staff from the joint professional standards department are proactive in engaging with local leadership teams and have introduced one-to-one meetings with inspectors across both forces. At the time of our inspection, they had met 55 inspectors to ensure the organisation learns from its mistakes and reinforces acceptable standards of behaviour. We found evidence that the force considers the Code of Ethics in developing force policy and in planning policing operations.

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 – declaring their business interests, gifts and hospitality, and public complaints.¹⁵ These findings reflect the research commissioned by the College of Policing, which highlights the importance of taking a problem-solving approach to preventing wrongdoing, by scanning and analysing police data to identify particular officers or hotspots for targeting prevention activity.

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

¹⁴ A notifiable association policy is designed to identify those individuals who could pose a risk to the integrity of an individual employee or the force itself. It requires the officer or staff member to report such associations which then allows a full evaluation of the risk posed to both the individual and the force to be undertaken.

¹⁵ *Integrity matters*, HMIC, January 2015. Available from: www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/

Identifying and understanding risks to integrity

Norfolk Constabulary has effective processes in place to identify, monitor and understand risks to the integrity of the organisation, but needs to understand and lessen the risk posed by officers whose vetting has expired.

The joint professional standards department for Suffolk and Norfolk Constabularies work to reduce the threats and risks identified by the National Crime Agency in their national anti-corruption assessment, which is currently being updated. The department has its own assessments, outlined within its control strategy, of the threats posed by corruption and has a plan of how it intends to address the risks identified.

The force places clear expectations on its staff at all ranks and grades to declare outside business interests, record any gifts or hospitality that they may be offered and inform the force of any associations or membership of certain organisations that the force need to be aware of to enable it to assess the risk of corruption or unethical behaviour. The staff we spoke with during the course of the inspection were aware of their responsibilities and the reasons why they were important to maintaining the integrity of the organisation. The joint professional standards department regularly monitors the gifts and hospitality register, which is made available for public scrutiny on the force's website. It assesses applications by staff for external business interests to ensure they are compatible with the values of the organisation and those that are refused are subject to ongoing scrutiny. The department regularly reviews associations required to be notified by staff for appropriateness.

The force uses a range of techniques to identify individual and organisational risks. This includes monitoring its own internal computer systems as well as monitoring open source information on social media. Norfolk and Suffolk Constabularies jointly have invested in software that enables them to monitor the use of their IT systems. The force is also aware of the risk posed by sensitive information being leaked to the media by those working within the organisation and routinely monitors contact from the media as a means of identifying such behaviour.

The force has an effective process in place to review individuals' vetting status when they move post, are promoted or there are changes in their personal circumstances. However, the force informed us that there were approximately 1,400 officers and staff within the force whose current vetting had expired. These were mostly police officers with between 10 and 15 years' service with little movement within the force at the same rank or grade. While the force has taken steps to address this, the chief officer team need to understand and lessen the risk this may represent until the issue is resolved.

Intervening early to manage risks to integrity

Norfolk Constabulary has made good progress to address the issues we identified in the 2014 Police Integrity and Corruption inspection and has effective processes in place to intervene early and manage identified risks. Last year we identified insufficient capacity within the joint professional standards department to prevent, reduce and investigate corruption matters effectively. The force, together with Suffolk Constabulary, has placed additional resources within the anti-corruption unit and has addressed our concerns to ensure it can respond effectively to corruption matters.

The force considers staff welfare alongside the vetting process and we found instances individuals being directed to organisations able to provide support on issues such as debt counselling. The anti-corruption unit reviews all intelligence it receives, and informed us that this is approximately 500 reports a year. Each intelligence report is assessed against a risk matrix which considers the risk to the individual and organisation. All reports that are being developed or involve operational deployments are reviewed regularly. The head of the professional standards department meets monthly with both forces' deputy chief constables and regularly with department heads to discuss cases involving their staff.

Looking for, reporting and assessing intelligence on potential corruption

Norfolk Constabulary proactively seeks and routinely assesses intelligence on potential corruption from a wide range of sources. The anti-corruption unit reviews all corruption-related intelligence daily and assesses the risk to the organisation and how the intelligence can be developed further to support an investigation.

The anti-corruption unit routinely monitors individuals who have had business interests refused, and those outside the organisation who may pose a risk of corruption due to previous associations with the force. The force has a confidential reporting system for staff to report their concerns anonymously. It is looking to enhance this facility so that it can provide two-way communication with staff and ensure adequate support while maintaining anonymity. Staff we spoke with understood the method of confidential reporting and felt confident in reporting unacceptable behaviour.

The force has responded positively to our findings in the 2014 police and integrity inspection and has introduced a policy of random drug and alcohol testing focused on those roles that pose the greatest risk to the organisation, such as officers carrying firearms or driving fast response vehicles, as well as in response to specific intelligence. Staff we spoke with knew of this policy and were aware of recent examples of its use.

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

In 2012 the Independent Police Complaints Commission (IPCC) and Association of Chief Police Officers (ACPO) published *The abuse of police powers to perpetrate sexual violence*.¹⁶ 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 consideration of how it should be investigated.

The Code of Ethics¹⁷ – 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.¹⁸ HMIC’s 2015 report *Integrity matters*¹⁹ identified police sexual misconduct as an area of great concern to the public. We share the public’s disquiet and so we examined 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.

¹⁶ *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

¹⁷ 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

¹⁸ Every three years, the National Counter-Corruption Advisory Group commissions a strategic assessment of the threat to law enforcement from corruption. The most recent assessment was completed in June 2013 by the Serious Organised Crime Agency. The assessment was based upon three years of intelligence reports on possible corruption gathered by forces in England and Wales, supplemented by information from other forces and national agencies.

¹⁹ *Integrity matters*, HMIC, January 2015. Available from: www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/

Recognising abuse of authority for sexual gain as serious corruption

Norfolk Constabulary recognises abuse of authority for sexual gain as serious corruption and a risk to the integrity of the organisation. Such behaviour is included in the joint professional standards department control strategy as a potential risk to the organisation. The force responds to such allegations and was able to provide data showing that it had dealt with 17 such cases in Norfolk and 16 in Suffolk: seven people were dismissed or resigned from the organisation. The force has a service confidence policy to help it manage the risk to the public posed by staff who could not lawfully be dismissed from the force because of insufficient evidence.

We found the workforce have a good understanding of the expected standards of behaviour with regard to relationships, and the force gave a number of examples of when staff had reported inappropriate behaviour that had led to an investigation and the individuals concerned leaving the force.

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

The joint professional standards department has started working with independent domestic violence advisers to raise their awareness of the issue of potential abuse of authority for sexual gain and is encouraging them to look for staff making inappropriate comments or contact with victims of domestic abuse. The department has also started to work with a charity supporting street sex workers and brothels. The joint professional standards department has also started working with refuges in Norwich and Lowestoft (Suffolk) to develop links to highlight officers or staff who may be abusing their authority for sexual gain.

The anti-corruption unit can identify and monitor individuals of concern and assesses the risk they may pose. This has led to officers being identified and dealt with quickly, preventing them from continuing to target vulnerable victims.

Taking action to prevent abuse of authority for sexual gain

Norfolk Constabulary is taking action to prevent abuse of authority for sexual gain and is preparing its workforce and partner organisations who support vulnerable victims to recognise inappropriate relationships or behaviour. The force needs to ensure that the issue is consistently understood at all levels across the entire organisation.

The head of the joint professional standards department has given presentations to staff in the anti-corruption unit to raise awareness about abuse of authority for sexual gain and behaviour that causes concern. Staff in the unit routinely review the complaint histories of staff and officers and assess relevant intelligence to make sure they have all the information available to make an assessment.

The force raises the awareness of inappropriate relationships with student officers and those joining the organisation, including members of the Special Constabulary. It has raised awareness of the issue at recent leadership forums and sergeant leadership training days, and includes it in the meeting with local inspectors to pass on this information to their staff. This briefing included details of learning from the IPCC report.²⁰

While the officers we spoke with were able to give examples of incidents that had been reported and felt confident in reporting such behaviour, the majority of staff we spoke with were not aware of any specific training provided by the force to raise awareness of the issue.

Building public trust

Norfolk Constabulary recognises abuse of authority for sexual gain as serious corruption and having a potentially serious impact on public confidence. The force reports all such allegations to the IPCC to reassure the public the matter is being taken seriously and with appropriate independent oversight. The force has an established response to incidents that may have a significant effect on public trust and confidence. In such cases, a chief officer is appointed to oversee the response, ensuring effective communication with the public to maintain confidence in the force.

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.²¹ 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.

²⁰ *The abuse of police powers to perpetrate sexual violence*, IPCC, September 2012. Available at: www.ipcc.gov.uk/sites/default/files/Documents/research_stats/abuse_of_police_powers_to_perpetrate_sexual_violence.PDF

²¹ *Literature review – Police integrity and corruption*, HMIC, January 2015. Available at: www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/

Working with the public

Norfolk Constabulary recognises the importance of being open with the public when the behaviour of its staff falls below that expected. It ensures that hearings and outcomes are publicised.

The force publishes comprehensive information on its public website, explaining the purpose of misconduct hearings and how the public can attend; it publishes the outcomes of misconduct cases on a quarterly basis. If a decision is made that a misconduct hearing should be held in private, the reasons why are explained and can be found on the public website; there had been a recent example when a legally qualified chair decided to hold the hearing in private due the physical and mental welfare needs of the accused officer. All serious cases of misconduct are referred to the IPCC for independent investigation and oversight to reassure the public the matter is being taken seriously.

Working with the workforce

Norfolk Constabulary uses a variety of channels to update staff on the outcome of complaints and misconduct investigations and regularly reminds staff about acceptable standards of behaviour and the code of ethics. It sends out a 'lessons learnt' document to staff, publishes the outcomes of misconduct investigations in staff circulars, makes personal contact with those witnesses affected by misconduct investigations to support and reassure them and holds a series of one-to-one meetings with inspectors across both forces. Although the staff we spoke with had limited recollection of the outcome of recent misconduct investigations, they were aware of where such information could be found. However, all the officers and staff we spoke with had a clear understanding of unacceptable standards of behaviour and their consequences.

Summary of findings



Good

Norfolk Constabulary is good at ensuring that its workforce behaves ethically and lawfully and has made good progress in responding to the issues we identified in the 2014 Police Integrity and Corruption inspection.

The force is effective in vetting people joining the organisation to ensure it recruits officers, staff and volunteers with high standards of ethical behaviour. It has developed and maintains an ethical culture among its workforce and routinely reinforces acceptable standards of behaviour. The force is aware of the large number of people within its workforce whose vetting has expired and is taking action to address this.

Norfolk Constabulary has effective processes to intervene early and manage identified risks and it seeks intelligence on potential corruption from a range of sources. It recognises abuse of authority for sexual gain as serious corruption which has a potential impact on public confidence. It is preparing its workforce and partner organisations who support vulnerable victims to recognise inappropriate relationships and behaviour and needs to ensure that the issue is consistently understood across the entire organisation.

The force recognises the importance of being open with the public when the behaviour of its staff falls below that expected. It ensures that hearings and outcomes are publicised and uses a variety of channels to update staff on the outcome of complaints and misconduct investigations to reinforce acceptable standards of behaviour.

Areas for improvement

- The force should ensure it complies with all aspects of the current national guidelines for vetting.
- The force should improve how it clarifies and reinforces standards of behaviour to its workforce, in particular when dealing with vulnerable people including victims of domestic abuse.

To what extent does the force treat its workforce with fairness and respect?

A workforce that feels it is treated fairly and with respect by its employers is more likely to identify with the organisation, and treat the public in a similarly fair and respectful way. Conversely, perceived unfairness within police organisations can have a detrimental effect on officer and staff attitudes and behaviours.²² 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.²³ On this basis, HMIC assessed how well the force engages with its staff to identify and understand the issues that affect them, and how well it acts on these issues and demonstrates it has done so.

Identifying and understanding the issues

Norfolk Constabulary uses a variety of methods to seek the views of the workforce and has a good understanding of the areas that have the greatest effect on the workforce perception of fair and respectful treatment. The force plans to conduct a staff survey in 2016 to understand better the views of the entire workforce.

²² *Fair cop 2: Organisational justice, behaviour and ethical policing*, College of Policing, 2015.

Available at:

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

²³ *Fair cop 2: Organisational justice, behaviour and ethical policing*, College of Policing, 2015, page 11. Available at:

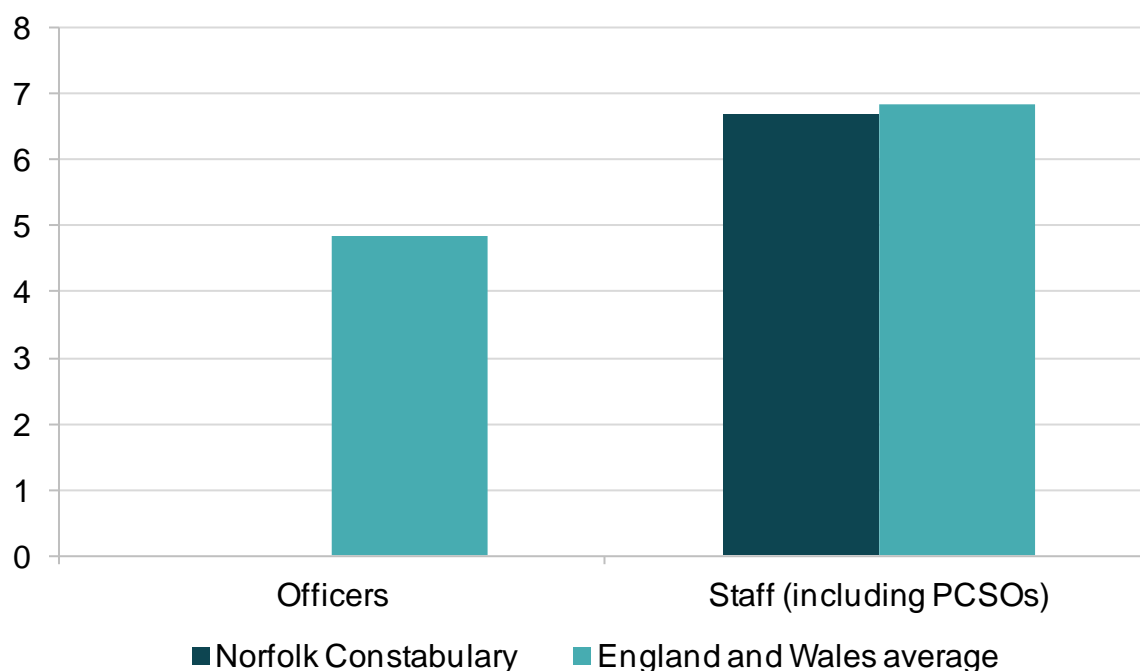
http://whatworks.college.police.uk/Research/Documents/150317_Fair_cop%202_FINAL_REPORT.pdf
f

Chief Officers are highly visible across the organisation and frequently use a variety of different methods to identify the issues that have the greatest impact on workforce perceptions of fair and respectful treatment. These include the Ask the Chief email facility (which can be used anonymously), web chats with chief officers, staff leadership forums and seminars, online blogs by senior officers, specific forums and various staff focus groups as part of the Norfolk 2020 Change Programme. In addition to this, chief officers regularly conduct unannounced visits to premises across the force to meet and talk with staff to provide them with direct access to a member of the force executive.

Senior leaders regularly meet staff associations and groups representing minority groups within the organisation. The force reviews exit interviews with staff who are leaving the organisation, internal misconduct investigations and public complaints and the fairness at work (grievance) procedure, to identify common themes where staff feel they have been unfairly treated. The workforce considers the chief officer team to be highly visible and approachable and sees its senior leaders as good role models for ethical behaviour.

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

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



Source: HMIC Legitimacy data collection

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

In the 12 months to 31 March 2016, Norfolk Constabulary finalised no formal grievances raised by officers per 1,000 officers, which was lower than the England and Wales average of 4.8 per 1,000 officers. During this period, the constabulary finalised 6.7 formal grievances raised by staff per 1,000 staff (including PCSOs), which was broadly in line with the England and Wales average of 6.8 per 1,000 staff (including PCSOs).

In last year's legitimacy inspection, we commented that the force had not conducted a formal staff survey for a number of years. The force is planning to conduct such a survey later in 2016, which will complement the activity the force is already undertaking and enable it to seek the views of the entire workforce.

Making improvements and demonstrating effectiveness

Overall, Norfolk Constabulary listens to the concerns raised by staff and takes action to address them. The force has consulted with staff extensively through the Norfolk 2020 Change Programme to seek their views on proposed changes and has fed this information back to the chief officer team. The force has recently consulted the workforce to seek their views on a revised 'mission and values' statement for the organisation. We found evidence of plans being changed as a result of staff feedback, specifically proposed changes to the working practices for crime scene investigators. The force revised its approach due to the strength of feeling of those involved who felt the changes were unfair. The change in approach was communicated to those concerned. There are positive relationships between the chief officer team, staff associations and staff networks, with clear lines of communication from the frontline to the chief officer team.

The force recognises practices that staff perceive as unfair, such as staff working within joint units being employed on contracts with different conditions of employment despite undertaking the same role. The force is working to address these complex issues common among collaborated forces, but some staff expressed their frustration over the length of time this was taking.

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 interested in what efforts forces were making to consider, and provide for, the wellbeing needs of their workforce. This year we considered the progress the force had made since the last inspection, with a particular focus on preventative activity to encourage wellbeing.

Workforce wellbeing is important to Norfolk Constabulary, which shares the provision of its wellbeing services with Suffolk Constabulary. Staff told us that they felt proud to work for Norfolk Constabulary, and that it was a people-focused organisation. The force's approach to staff wellbeing is set out in its 'Forcefit' programme, which covers all aspects of wellbeing, including physical health, mental health awareness and support, and psychological support for its staff. The force has specific policies in place to support staff on maternity, adoption, substance abuse, domestic abuse and flexible working. It has recently focused on mental health. We found that staff were aware of the welfare services available and how to access them, and they commented favourably on the quality and timeliness of the services provided. It is encouraging to note that support is provided to members of the Special Constabulary. Overall supervisors were aware of their responsibilities for the welfare of their staff and the force proposes to enhance training for supervisors within its revised leadership and development programme.

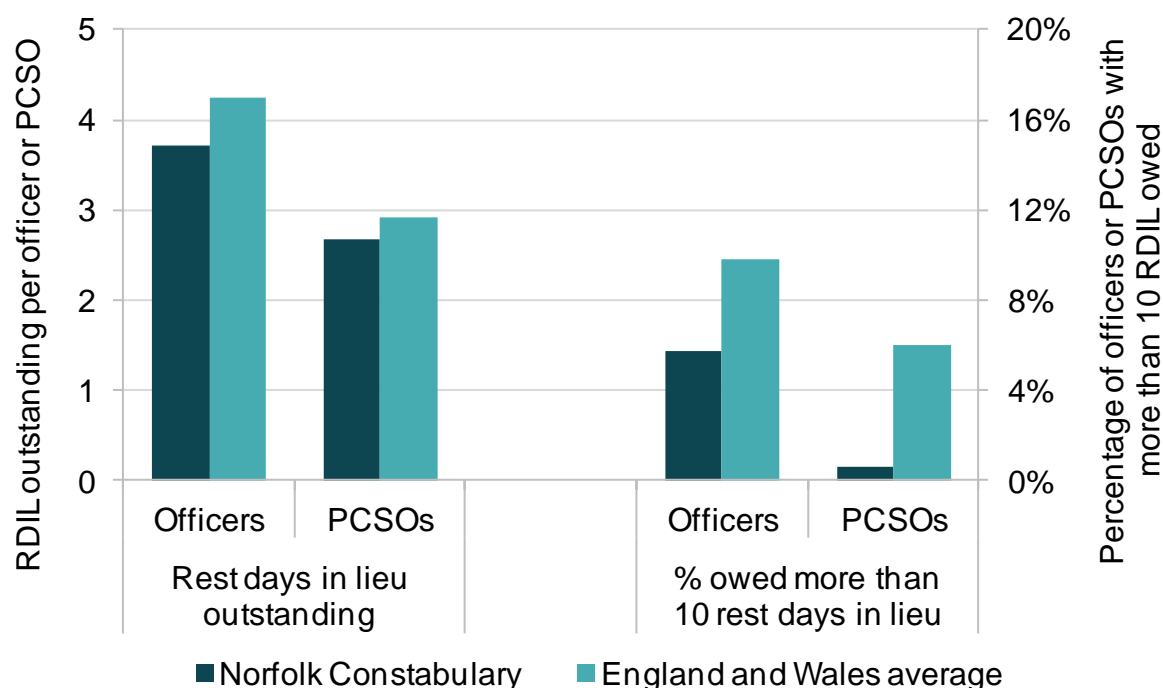
Understanding and valuing the benefits

Workforce wellbeing is important to Norfolk Constabulary, which shares the provision of its wellbeing services with Suffolk Constabulary. Staff told us that they felt proud to work for Norfolk Constabulary, and that it was a people-focused organisation. The force's approach to staff wellbeing is set out in its 'Forcefit' programme, which covers all aspects of wellbeing, including physical health, mental health awareness and support, and psychological support for its staff. The force has specific policies to support staff on maternity, adoption, substance abuse, domestic abuse and flexible working. It has recently focused on mental health. We found that staff were aware of the welfare services available and how to access them, and they commented favourably on the quality and timeliness of the services provided. It is encouraging to note that support is provided to members of the Special Constabulary. Overall supervisors were aware of their responsibilities for the welfare of their staff and the force proposes to enhance training for supervisors within its revised leadership and development programme.

Identifying and understanding the workforce's wellbeing needs

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

Figure 4: Number of rest days in lieu outstanding per officer or police community support officer (PCSO) and the percentage of officers or PCSOs with more than 10 rest days in lieu owed to them in Norfolk Constabulary compared with England and Wales, as at 31 March 2016



Source: HMIC Legitimacy data collection

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

As at 31 March 2016, there were 3.7 rest days in lieu outstanding per officer in Norfolk Constabulary, which was broadly in line with the England and Wales average of 4.2 days per officer. On the same date, there were 2.7 rest days in lieu outstanding per PCSO in the constabulary, which was broadly in line with the England and Wales average of 2.9 days per PCSO. As at 31 March 2016, 5.7 percent of officers in Norfolk Constabulary had more than 10 rest days in lieu owed to them, which was broadly in line with the England and Wales average of 9.8 percent. As at 31 March 2016, 0.6 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.

Norfolk Constabulary is good at identifying and understanding the workforce's wellbeing needs, but it could do more fully understand fully and take appropriate action to address the high levels of short and medium-term sickness among officers and staff.

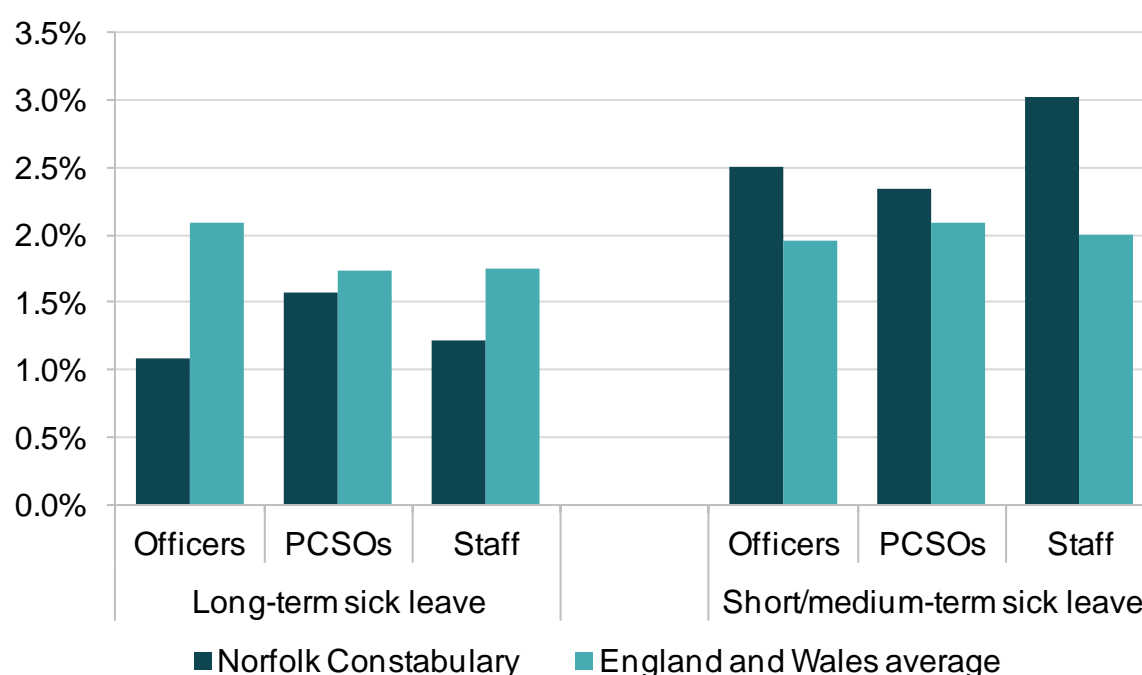
The force provides an extensive range of wellbeing services for its workforce and is looking to develop this further by providing mobile health screening and occupational health drop-in centres. In 2015, the force informed us that it provided 400 wellbeing appointments for staff with the Police Mutual Foundation, which provided practical wellbeing advice. This proved popular with staff and the force is looking to repeat the

programme in 2016. The force undertook a survey in 2015 seeking the views of staff across Norfolk and Suffolk; this provided valuable feedback on staff's awareness of the services available and suggestions on how the service could be developed. The force has responded to these findings by further marketing the services it provides.

The force reviews incidents of staff being injured on duty during various force daily management meetings and regularly reviews information on sickness and absence from work. Health and safety matters are discussed at the monthly joint chief officer team meeting which includes a comprehensive update covering policy development, legal requirements, training and lessons learnt, both internally and from other forces.

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

Figure 5: Percentage of officers, police community support officers and staff on long-term and short/medium-term sick leave in Norfolk Constabulary compared with England and Wales, as at 31 March 2016



Source: Home Office Annual Data Requirement

Note: Long-term sickness is defined as an absence due to sickness that has lasted for more than 28 days as at 31 March 2016. For further information about the data in figure 5 please see annex A.

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

- 1.1 percent of officers were on long-term sick leave, which is lower than the England and Wales average of 2.1 percent.

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

Sickness data in the Home Office Annual Data requirement indicate that on 31 March 2016 Norfolk Constabulary had low levels of long-term sickness among officers. The force said that this is due to the force correctly identifying officers who are unable to undertake the full range of operational duties and assigning them appropriate tasks rather than letting them remain on long-term absence from work.

However, the same published data show that the short and medium-term sickness among officers and staff was higher than the England and Wales average. Given the extensive range of wellbeing services provided by the force, it needs to do more to fully understand the significance of these figures and take effective and appropriate action.

Taking preventative and early action to improve workforce wellbeing

Norfolk Constabulary is good at taking preventative and early action to improve workforce wellbeing. The joint wellbeing unit undertakes proactive work to raise awareness of stress and mental illness and holds workshops for staff to help them identify stress factors in themselves and others. The force recognises that mental health is an issue for its staff given the increasing workloads, and has signed up to the Blue Light Health Scheme.²⁴ The force has a programme to raise the awareness of mental health and has submitted a bid through the Evidenced-Based Policing programme to conduct research into 'the role of the police officer and the effect on their wellbeing' to understand better the issues and provide evidence of what works.

Overall, supervisors were aware of the wellbeing services available but this was less evident among those new to the role; the force is addressing this issue and is holding masterclasses with supervisors about their role in managing restricted and recuperative duties, and sickness and has provided a number of drop-in sessions for

²⁴ The mental health charity MIND's Blue Light Programme provides mental health support for emergency services staff and volunteers from police, search and rescue, fire and ambulance services across England.

managers to raise awareness of mental health. The force will include mental health awareness in the forthcoming leadership training programme.

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.²⁵ 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.²⁶

The performance assessment process

Norfolk Constabulary has adequate processes in place to assess the performance of its workforce; however, they are applied inconsistently across the organisation. This was an issue identified in last year's HMIC inspection where we found that the force's approach to managing appraisals was dependent on individual line managers.²⁷ The force has responded well and has revised and re-launched its staff appraisal process for the 2016-17 period, incorporating guidance from the College of Policing. The force is emphasising the importance of fair and consistent staff appraisals through its learning and development team and the use of trained force champions across the organisation to ensure staff understand and use the new system effectively. The new staff appraisal is linked to the force's revised vision and acceptable standards of behaviour and also provides a way of identifying leadership and professional development needs for its entire workforce. The force needs to continue its work and ensure it implements this new staff appraisal process effectively.

The results of performance assessment

Norfolk Constabulary is inconsistent in how it assesses and subsequently manages the performance of its workforce across the entire organisation. The force has recognised this and recently re-launched its staff appraisal process following consultation with the workforce and staff associations to ensure that the new process

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

Available at:

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

²⁶ 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

²⁷ *PEEL: Police legitimacy 2015*, HMIC, February 2016. Available at:

www.justiceinspectorates.gov.uk/hmic/publications/police-legitimacy-2015-norfolk/

is fair and effective. The new appraisal process has been designed to record and track individual performance and progression, and to encourage performance improvement and continuing professional development. The force plans to introduce a challenge panel of HR managers and senior leaders to provide oversight to ensure fairness and consistent across the entire organisation.

The force shares a joint performance improvement unit with Suffolk for those staff whose performance has been deemed unsatisfactory. This provides consistent advice and support to managers to ensure a fair and a consistent approach to managing unsatisfactory performance across both organisations.

Summary of findings



Good

Overall, Norfolk Constabulary is good at treating its workforce with fairness and respect. It uses a variety of methods to identify and understand the areas that have the greatest effect on the workforce's perception of fair and respectful treatment. It listens to the concerns raised by staff and takes action to address them. The force plans to develop its understanding further by conducting a staff survey in 2016 to gain the views of the entire organisation.

Workforce wellbeing is important to Norfolk Constabulary, which provides a range of services to prevent the health of staff from suffering and take action to address their wellbeing needs. The force is good at identifying and understanding the workforce's wellbeing needs and offers a wide range of wellbeing services but could do more to understand fully and take appropriate action to address the high levels of short and medium-term sickness among officers and staff. Staff told us that they felt proud to work for Norfolk Constabulary and were complimentary of the services provided by the organisation.

The force has made good progress in responding to last year's findings about how it assesses the performance of its workforce and has developed and recently implemented a new way of assessing staff 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.²⁸

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

²⁸ *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