



Promoting improvements  
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# PEEL: Police legitimacy 2016

An inspection of Wiltshire Police



December 2016

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ISBN: 978-1-78655-316-4

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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.<sup>1</sup> This is often referred to as 'procedural justice'. Police actions that are perceived to be unfair or disrespectful can have extremely negative results for police legitimacy in the eyes of the public.

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

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

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

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

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

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

## Force in numbers



### Workforce

Total workforce as of 31 March 2016

**1,983**

Total workforce breakdown as of 31 March 2016



### Ethnic diversity

Percentage of BAME in workforce 31 March 2016

overall workforce

**1.5%**



Percentage of BAME in local population, 2011 Census

**5.5%**



### Gender diversity

Percentage of females in overall workforce 31 March 2016

Wiltshire Police  
**47%**

England and Wales  
population, 2011 Census

**51%**

Percentage of females by role 31 March 2016





## Public complaints

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

Officers

Wiltshire Police

**429**

England and Wales force average

**268**

Staff (including PCSOs)

**234**

**61**



## Grievances

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

Officers

Wiltshire Police

**8.8**

England and Wales force average

**4.8**

Staff (including PCSOs)

**8.3**

**6.8**



## Victim satisfaction

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

Wiltshire Police

**93.5%**

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 judgment<sup>3</sup>



**Good**

Wiltshire Police has been assessed as good in respect of the legitimacy with which it keeps people safe and reduces crime. The force has values and behaviours that are clearly understood by the workforce and in line with the Code of Ethics. Treating the people it serves fairly and with respect is at the core of the force values and behaviours, and forms the basis of all training. Our findings this year are consistent with last year's findings, in which we judged the force to be good in respect of legitimacy.

### Overall summary

The force has clear and well-understood values and behaviours that mirror the nine elements of the Code of Ethics. These values and behaviours are embedded within the annual appraisal process and are at the heart of all training.

There is frequent interaction between the workforce and senior officers and, through the chief officers' web chats and roadshows, and extensive leadership development and communication programmes, the force is able to assess threats and risks to staff wellbeing effectively.

The force has effective processes for vetting and follows national guidelines. Vetting is an agenda item for recruitment and selection meetings for all staff and volunteers, and it is an important element of the annual appraisal process.

The force values and seeks to promote the wellbeing of its staff. It has appointed a mental health nurse to assist because the force has identified an increasing number of psychological issues from its sickness data. Occupational health is available and is perceived as a valuable resource. The force has introduced a confidential care line for self-referrals.

The force could do more to work directly with the public, in particular those who may have less trust and confidence in the police. Its involvement is not innovative and it does not have an independent advisory group (IAG) or key individual network (KIN). Its external channels for challenge and feedback are less well developed than its internal processes.

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



## **Recommendations**

Wiltshire Police is a good force. HMIC has not identified any causes of concern and has therefore made no specific recommendations.

### **Areas for improvement**

- The force should improve how it seeks feedback from the people it serves about their experiences (or perceptions) of how the police have treated them.
- Annually, the force should produce a local counter-corruption strategic assessment and control strategy, to identify risks to the force's integrity.

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

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

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

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

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

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

### Organisational values

Wiltshire Police has well-established values that make its expectations clear to the workforce on the importance of treating the public it serves with fairness and respect. These values and behaviours are well recognised by the workforce and are in line with the police Code of Ethics. Treating the people it serves fairly and with respect is fundamental to force values, and this is clearly articulated in its document Our Commitments to the Public. The document is widely circulated and understood by staff. Specific training on the force values and behaviours form part of the induction

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

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

given to all new staff. Leadership training for all supervisors and the annual appraisal process also emphasise the importance of these values and behaviours. The chief constable has undertaken forcewide workshops, reinforcing the importance of the force's vision, values and effective behaviours, which was confirmed in reality testing. Our findings in this area are consistent with last year's inspection.

## **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**

The force has an engagement strategy which outlines the ways in which, together with the office of the police and crime commissioner (OPCC), the force will work with, consult and communicate with the public. This strategy has been created since HMIC's last inspection of legitimacy in 2015, and follows a full review of internal and external communications and involvement. It has provided the basis for 81 actions, which will be led by the force's public service and quality board (PSQB), chaired at chief officer level. Further oversight will be provided at the strategic delivery and transformation board, held monthly and chaired by the chief constable.

To understand the impact of a number of strategies, policies and procedures, the force commissioned an external company to conduct a review. The main strategies reviewed were those relating to people, diversity, positive action, public engagement, training and communication. After the review, there were three days of interviews with principal stakeholders. A report has since been prepared which makes a number of recommendations. These include a focus on internal communications, addressing issues raised by staff with regards to learning and development; developing a comprehensive approach to coaching; reviewing the annual appraisal and promotion processes; and externally, reviewing the engagement strategy by consulting with the public on how best to receive feedback and communicate important messages. These processes and policies have been amended or updated as a result of this review.

The force uses social media to seek feedback and challenge from the public. It currently operates 90 accounts on Twitter and Facebook. Cumulatively, these have a reach of some 3.8m users, with over 40,000 Twitter followers and over 65,000 Facebook users. This has increased by 89 percent over the past 12 months across all networks (July 2014–July 2015). Recently, the public were consulted on changes

proposed by the force. A public survey was used to gather opinion on the changes planned for the Salisbury custody facility. Public meetings were held, led by the local inspector, to discuss the closure. The force also used community area boards to highlight the proposals as well as attending council meetings to seek feedback.

However, while the force does seek feedback and challenge generally, it is not yet fully equipped to identify all the issues that have the greatest impact on people's perceptions of fair and respectful treatment. Although we were given detailed examples of local engagement with harder to reach communities by commanders and through Swindon Council and the West Wiltshire faith groups, it does not have an independent advisory group (IAG) or a key individual network (KIN). It is the only force inspected by HMIC not to have such arrangements in place, which would encourage those identified as having less trust and confidence in the police to have their say.

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

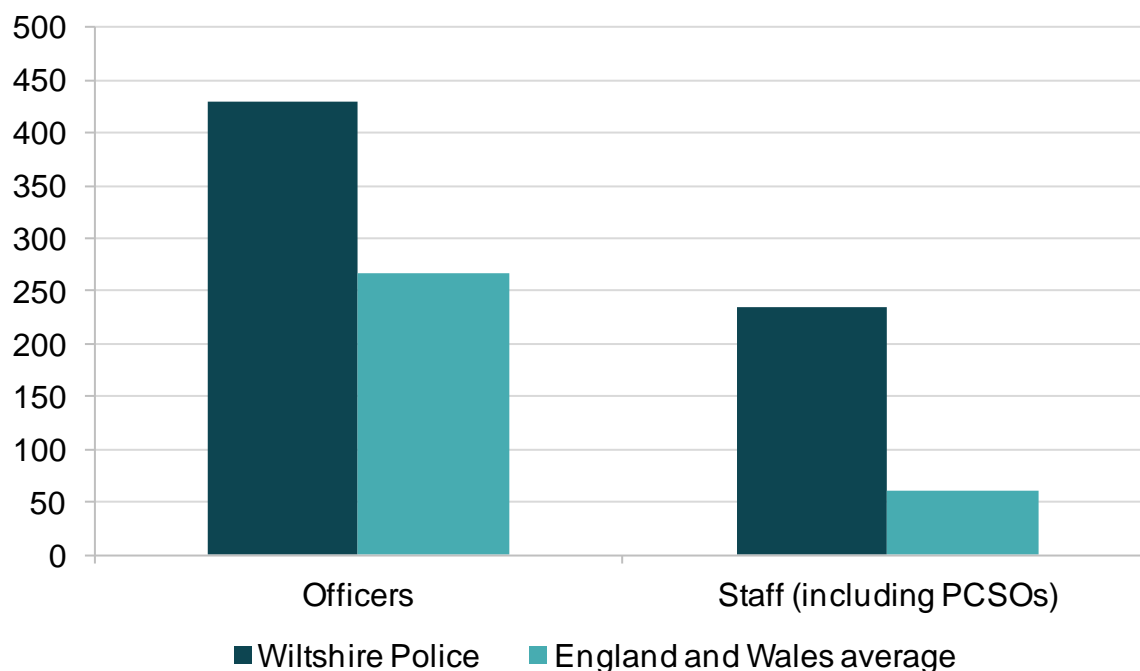
Wiltshire Police actively seeks feedback from the people it serves. A good example is the proposed new community policing operating model. Force involvement with the public started in late 2013 to find out how people would describe the purpose of Wiltshire Police. Over 500 people from varying demographics and locations across the force area were asked three questions in a web-based survey:

- In your opinion, what is the purpose of Wiltshire Police?
- On a scale of 1–10, how do you think they meet that purpose?
- What would they need to do to reach a 10?

The responses included the need for officers to be more visible and accessible. The consultation was used to shape the force's 'new ways of working' programme. This included issuing personal mobile devices to officers, which allow them to access force systems and data without having to return to police stations, thereby remaining visible and accessible to the community.

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 Wiltshire 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, Wiltshire Police recorded 429 public complaint cases per 1,000 officers, which was higher than the England and Wales average of 268 cases per 1,000 officers. During this period, the force recorded 234 public complaint cases per 1,000 staff (including PCSOs), which was higher than the England and Wales average of 61 cases per 1,000 staff (including PCSOs).

The most recent Independent Police Complaints Commission (IPCC) data from forces show that, for April, May and June 2016, the types of complaint most frequently recorded by Wiltshire are 'other neglect or failure in duty' and 'incivility, impoliteness and intolerance'.<sup>6</sup> It is important to note, however, an issue identified during our 2014 police integrity and corruption inspection;<sup>7</sup> complaint allegation categories used by different forces may overlap with each other. For instance, similar allegations might be recorded by one force as 'other neglect or failure in duty', and by another force as 'other irregularity in procedure' or 'lack of fairness and impartiality'. This means there is no definitive way of establishing accurately the number of public complaints about certain behaviours.

<sup>6</sup> Independent Police Complaints Commission data are available at: [www.ipcc.gov.uk/reports/statistics/police-complaints/police-performance-data](http://www.ipcc.gov.uk/reports/statistics/police-complaints/police-performance-data)

<sup>7</sup> *Integrity matters*, HMIC, January 2015. Available from: [www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/](http://www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/)

In August 2014, following HMIC's 2013 inspection on the effective and fair use of stop and search powers,<sup>8</sup> the Home Office published guidance to police forces on how to implement the Best Use of Stop and Search (BUSS) scheme.<sup>9</sup> The scheme aims to increase transparency and community involvement, and to support a more intelligence-led use of the powers leading to better outcomes. All police forces in England and Wales signed up to participate in the scheme. In 2015, HMIC's legitimacy inspection<sup>10</sup> considered the extent to which the force was complying with the scheme and found that it did not comply with four features of the scheme. Consequently, the Home Secretary suspended the force from participation in the scheme. In 2016, we revisited the force to assess its compliance with the scheme and found that it still did not comply with one feature: recording and publishing outcomes. However, we are satisfied that the force has, since our revisit, achieved compliance with all features of the scheme. Details of our revisit can be found on HMIC's website at [www.justiceinspectorates.gov.uk/hmic/publications/best-use-of-stop-and-search-scheme](http://www.justiceinspectorates.gov.uk/hmic/publications/best-use-of-stop-and-search-scheme)

The force operates an independent custody visitor (ICV) scheme with 24 volunteers who visit one of the two custody suites on a weekly basis, checking on the welfare of people in custody. Well-defined governance is in place for this scheme in which any concerns are raised immediately with the custody sergeant and then entered into a database. The next visit will check that action has been taken on the previous concerns, and there is an escalation process via the ICV coordinator and custody inspector if necessary. Twice-yearly meetings take place between the OPCC, ICV and custody inspector which result in clear actions. A review of the minutes of the last meeting noted an ongoing public and partner consultation on the venue of a new custody facility (Warminster was identified as the preferred option). In addition, the minutes mentioned recurring themes, such as excessive odours in cells, availability of inspectors for Police and Criminal Evidence Act (PACE) 1984 reviews and requests for different foods.

In relation to working with hard-to-reach communities, the force is using consumer data on lifestyles, preferences and behaviours of the adult population to understand local communities better. There were several examples of specific work with different communities, such as people in older age groups. There is no official link with a KIN or other similar system, but communication takes place on an informal basis. There

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<sup>8</sup> *Stop and Search Powers – are the police using them effectively and fairly?* HMIC, July 2013. Available from: [www.justiceinspectorates.gov.uk/hmic/publications/stop-and-search-powers-20130709/](http://www.justiceinspectorates.gov.uk/hmic/publications/stop-and-search-powers-20130709/)

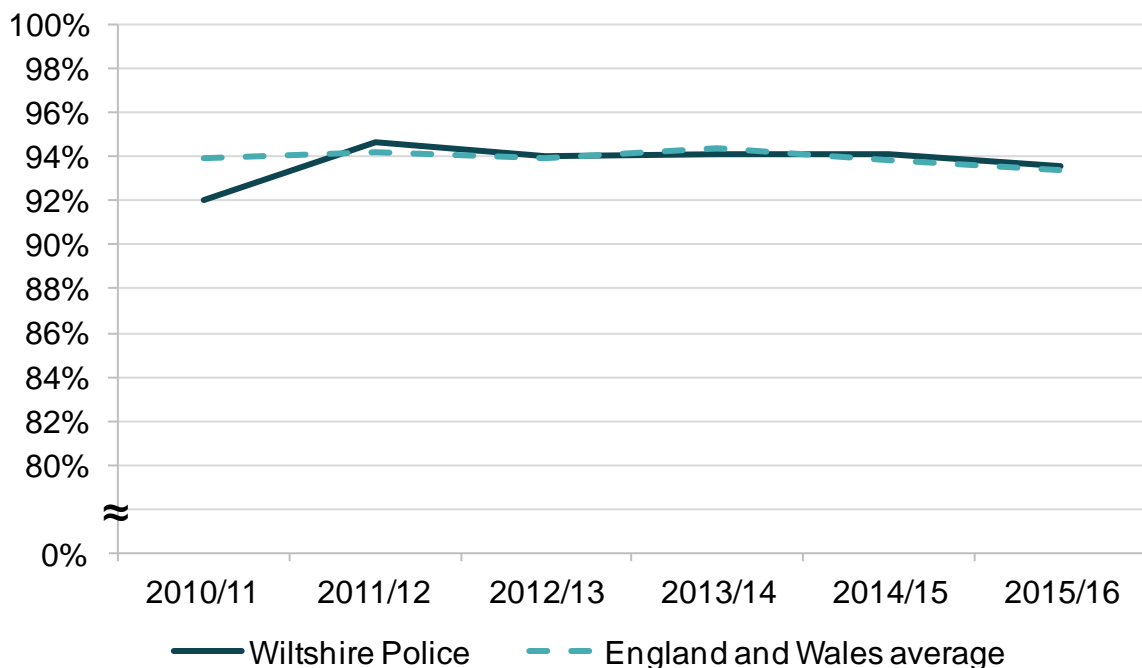
<sup>9</sup> Best Use of Stop and Search Scheme, Home Office, August 2014. Available at: [www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/346922/Best\\_Use\\_of\\_Stop\\_and\\_Search\\_Scheme\\_v3.0\\_v2.pdf](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/346922/Best_Use_of_Stop_and_Search_Scheme_v3.0_v2.pdf)

<sup>10</sup> *PEEL: Police legitimacy 2015 – A national overview*, HMIC, February 2016. Available at: [www.justiceinspectorates.gov.uk/hmic/publications/police-legitimacy-2015/](http://www.justiceinspectorates.gov.uk/hmic/publications/police-legitimacy-2015/)

is a pilot scheme at the main Swindon post office, which acts as a drop-in centre where police officers and police community support officers (PCSOs) are available to speak to the public, including many older people. Other examples include two individuals based in Swindon who work on issues relating to vice crime. Enforcement is part of their role but the main emphasis is on acting to minimise risk to individuals.

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 Wiltshire Police compared with England and Wales, from the 12 months to 31 March 2011 to the 12 months to 31 March 2016**



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

In the 12 months to 31 March 2016, 93.5 percent of all victims of crime (excluding hate crime) who responded to the victim satisfaction survey were satisfied with the overall treatment provided by Wiltshire Police, which was broadly in line with the England and Wales average of 93.4 percent; and lower than the 94.1 percent who were satisfied with the overall treatment that the force provided in the 12 months to 31 March 2015, this is not a statistically significant difference.

Twice-yearly public opinion surveys are commissioned by the OPCC to measure public confidence, along with other perceptions relating to the services provided by the force. Any outliers are raised with the public service and quality board. The last survey identified lower satisfaction than in previous surveys. This appears to relate to

reductions in police visibility, and the perception that the police should be available to deal with crime and anti-social behaviour. However, this reduction in satisfaction appears to have had little impact on the public's overall confidence in Wiltshire Police, which remains in line with the England and Wales average.

## **How well does the force act on feedback and learning to improve the way it treats all the people it serves, and demonstrate that it is doing so?**

It is important that as well as actively seeking feedback from the public, the force also responds to that feedback. HMIC assessed the extent to which this response includes changes to the way the force operates to reduce the likelihood of similar incidents occurring in future, as well as resolving individual incidents or concerns, and how well the force communicates to the public the effectiveness of this action.

### **Making improvements**

The force reviews lessons learned from any operation and policy through an organisational review board. An example is Operation Invoke, which concerned a domestic homicide case. Inconsistencies in the police approach led to an Independent Police Complaints Commission investigation. As a result, the force revised the relevant policies and made changes to domestic violence training. To emphasise the effect this situation had had on the victim's family, some family members agreed to attend one of the training sessions to give direct feedback to Wiltshire staff on their experiences. A DVD was created to reinforce learning from the incident, and will be incorporated into future training.

In addition, the force has a rolling training programme for officers to ensure that their powers are used legitimately and to best effect. The training programme includes an initial sergeant's course, which covers managing complaints and grievances, and a leadership 'continuing professional development cycle' (CPD). This is a monthly one-day rolling programme that includes training on leadership styles, the Code of Ethics, performance culture, stop and search, managing performance, critical incidents and sickness. Data given to the inspection team showed that to date 240 staff had attended the CPD programme.

At the time of the inspection, the scrutiny board, created to elicit feedback around stop and search, had met twice, but no complaints had been received for review. The force has made progress in ensuring its compliance with BUSS and there is a clear improvement plan to record progress. In relation to data recording, there is a new stop and search form to record all outcomes and training has been given to supervisors on race and diversity. There is a quarterly review of 100 stop and search records, and reviews of the 20 most-stopped and searched individuals to ensure



reasonable grounds. This information is fed back to the scrutiny board. Also, the force policy and clear information on to how to become a lay observer are published on the force's website.

### **Demonstrating effectiveness**

The force has recently produced a public engagement strategy with a timescale and action plan. It recognised a gap in its understanding of the diverse nature of the communities it serves and in December 2015 the force commissioned an external company to assist. An outcome of this was the scrutiny panel for stop and search, which allows the public to see how the force conducts its stop and searches. This process is in its infancy and so the force's response to feedback cannot yet be judged.

The public opinion surveys commissioned by the police and crime commissioner are used to measure public confidence, along with other public perceptions of the services provided by the force. Results by exception are raised at the PSQB. Victim satisfaction levels are calculated using rolling 12 months' results. The last police and crime commissioner survey identified lower satisfaction with police visibility and a reduced perception that police would be available to deal with crime and anti-social behaviour. However, these reductions appear to have had little impact on the public's overall confidence in Wiltshire Police.

### **Summary of findings**



**Good**

Wiltshire Police is good at treating the people it serves with fairness and respect. Its values and behaviours, which are in line with the police Code of Ethics, are widely understood. The force has good arrangements in place to make sure that the workforce has the skills to understand the need to treat the public with fairness and respect. It has an engagement strategy that outlines the ways in which it will involve, consult and communicate with the public. To understand better the impact of a number of specific force strategies, policies and procedures, it has commissioned an external company to conduct a review. With regard to working with hard-to-reach communities, the force is using consumer data to better understand their demographics. In addition, the force uses social media to obtain feedback from the public. It explores the views and perceptions of the public in a variety of ways, including through surveys and local contact. It then uses the feedback from public consultation to improve services, inform training and shape policy. However, many of the activities that the force has implemented are in their early stages and we look forward to seeing the benefits in the longer term. The force does not have an independent advisory group or a key individual network to encourage those identified as having less trust and confidence in the police to have their say.

### **Area for improvement**

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

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

In 2014, HMIC inspected the extent to which the police were acting with integrity and guarding against corruption.<sup>11</sup> Given the continued importance of this topic, we are returning in this question to those national recommendations emerging from the 2014 report from that inspection, that our 2015 legitimacy inspection did not cover. Our inspection focus this year also reflects research showing that prevention is better than cure: the best way to ensure that police workforces behave ethically is for the forces to develop an ethical culture and to have systems in place to identify potential risks to the integrity of the organisations, so that forces can intervene early to reduce the likelihood of corruption.<sup>12</sup>

## How well does the force develop and maintain an ethical culture?

One of the first things forces can do to develop an ethical culture is to use effective vetting procedures to recruit applicants who are more likely to have a high standard of ethical behaviour, and to reject those who may have demonstrated questionable standards of behaviour in the past, or whose identities cannot be confirmed.

Once recruited, one of the best ways to prevent corruption from occurring among the workforce is by establishing an ethical working environment or culture. To achieve this, forces need to clarify and continue to reinforce and exemplify acceptable and unacceptable standards of behaviour, including the Code of Ethics.<sup>13</sup> This year, HMIC focused on assessing progress in those areas highlighted for improvement in our 2015 legitimacy inspection and our 2014 integrity and corruption inspection.

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<sup>11</sup> *Integrity matters*, HMIC, January 2015. Available from:  
[www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/](http://www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/)

<sup>12</sup> *Promoting ethical behaviour and preventing wrongdoing in organisations*, College of Policing, 2015. Available at:  
[http://whatworks.college.police.uk/Research/Documents/150317\\_Integrity\\_REA\\_FINAL\\_REPORT.pdf](http://whatworks.college.police.uk/Research/Documents/150317_Integrity_REA_FINAL_REPORT.pdf)

<sup>13</sup> *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](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](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/](http://www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/)

## **Initial vetting**

Vetting of staff to an appropriate level is a priority for the force and follows national guidance. Vetting processes are managed effectively through the recruitment strategy panel and people intelligence board (PIB). All new members of staff are vetted. A higher level of vetting is applied to those in roles that represent a greater risk to the organisation. These individuals are re-vetted on a regular basis. In its attempt to recruit a diverse cadet force, Wiltshire Police has considered the vetting process carefully so as not to discriminate inappropriately. An established vetting policy and procedure details the general considerations when making security clearance decisions, and gives a commitment to maintain the highest levels of honesty and integrity when appointing staff, contractors and volunteers. Decisions to approve, refuse, withdraw or limit security clearances are only made when all available information has been assessed, including, where applicable, an interview with a vetting analyst. Any refusals are recorded. In addition, the annual appraisal process requires staff to mention any changes in personal circumstances, in line with force policy.

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 could 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**

During our inspection, we found that the values and behaviours expected of staff are clearly understood. The chief constable regularly sends clear messages and there have been several force-wide campaigns to reinforce the values, which complement the Code of Ethics. The force has run a number of workshops and seminars to strengthen understanding of its values and behaviours. In addition, values and behaviours are included in annual appraisals of staff, with personal objectives set against these elements. The principles are also constantly referred to in training sessions. The result is a full understanding by staff of both acceptable and unacceptable behaviour. There are clear policies covering business interests, notifiable associations, gifts and hospitality, and the use of social media. How people understand these, and demonstrate their understanding, is checked and considered annually during the individual appraisal process.

The force has made a significant investment in leadership development and training, where the focus is on the force values. As part of their training, student officers are assessed against the standards set in the national Policing Professional Framework. There are four one-day courses for sergeants and inspectors, which focus on leadership development and the values of the organisation. These are complemented by the chief constable's leadership days. Officers looking to achieve

promotion to inspector and superintendent are put through a training programme that also covers the force values. Dilemma-based learning is now used in the force's training in both stop and search and values and behaviours.

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

HMIC's 2014 police integrity and corruption inspection emphasised the need for forces to make arrangements for continuous monitoring of their ethical health, through active monitoring of force systems and processes to spot risks to their integrity, including – but not limited to – business interests, gifts and hospitality, and public complaints.<sup>14</sup> These findings reflect the research commissioned by the College of Policing, which highlights the importance of taking a problem-solving approach to preventing wrongdoing, by scanning and analysing police data to identify particular officers or hotspots for targeting prevention activity.

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**

Although the professional standards department have an internal tasking meeting, the force does not have a local counter-corruption threat assessment and control strategy and relies on the national assessment as a framework to prioritise risks.

The force has established effective processes to monitor business interests, gifts and hospitality, and notifiable associations. For example, the gifts and hospitality register is published online and open to challenge. There are a number of governance boards that check the integrity and behaviour of the workforce. The People Intelligence Board (PIB) brings together all known intelligence about staff and this enables the board to ensure that the workforce is acting in line with the force's values and standards development plan. These board meetings review potential risks to the force by monitoring complaints to identify potential integrity issues, overtime and sickness concerns or poor performance. There is also a closed session of the PIB that involves a selected member of senior staff discussing issues concerning senior officers. Integrity issues are also discussed by the senior

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

command team charged with reviewing the gifts and hospitality register. Promotions and postings are finalised at the resource management panel, which includes the heads of the professional standards and human resources departments.

The need to declare business interests was clearly understood by the staff we spoke to during our inspection. The force has a Code of Ethics committee, which makes decisions around ethical dilemmas that may affect the morale or wellbeing of the workforce. However, there is currently no external scrutiny of the committee and it has no independent or external representatives. The force has clearly communicated, and continues to reinforce, acceptable and unacceptable standards of behaviour.

Reports of wrongdoing can be given anonymously and there are established support and welfare arrangements for those wishing to report any wrongdoing or who are the subject of such reports. The counter-corruption unit uses the national threat assessment, which then feeds into a regional assessment.

During the inspection, HMIC were told that random and 'with cause' drugs testing takes place across the force. Over 100 random tests are done each year among staff who have been identified as occupying safety-critical roles or those who deal with certain vulnerable groups.

The force has the ability to monitor internal systems, such as computer and mobile phone use, or credit card use. However, such reviews are technical and require specialist ICT staff to operate their systems. This unnecessarily widens the circle of knowledge.

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

The force has a counter-corruption unit within its professional standards department. While it is able to identify some organisational risks, the unit acknowledges that its ability to be proactive is limited. This was an area highlighted in the 2014 inspection when the force was in the process of recruiting a researcher to the unit to assist in identifying and prioritising demand in this area. The force does not have a local counter-corruption threat assessment and control strategy and it was not clear to the inspection team how it identified future risks to the organisation or how it managed demand within the unit.

The PIB has a robust process for managing the bottom 5 percent performers in the force. It uses a number of indicators to assist in this monitoring, including vetting, complaints and outcomes from performance development reviews (PDRs). This allows the force to identify those within the organisation who require a higher level of support and supervision.

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

Wiltshire Police has an established system that looks for, receives and assesses intelligence, in line with national standards on potential corruption. This is operated via the counter-corruption unit. If someone wants to report concerns about a member of staff, they can use an anonymous independent whistle-blowing hotline that is well known to all staff. The force also has its own internal email reporting system. Many members of the workforce are happy to contact the professional standards department directly to discuss any concerns they have. The force routinely conducts drug testing of staff and it treats abuse of authority for sexual gain as serious misconduct. The issue is introduced in various training courses, and a recent case involved the dismissal of a member of staff. All the workforce were told about this, to emphasise that the conduct was unacceptable.

## 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) published *The abuse of police powers to perpetrate sexual violence*.<sup>15</sup> This report states that “the abuse of police powers for purposes of sexual exploitation, or even violence, is something that fundamentally betrays the trust that communities and individuals place in the police. It therefore has a serious impact on the public’s confidence in individual officers and the service in general.” The report identified this behaviour as a form of serious corruption that forces should refer to the IPCC for its consideration of how it should be investigated.

The *Code of Ethics*<sup>16</sup> – which sets out the standards of professional behaviour expected of all policing professionals – explicitly states that they must “not establish or pursue an improper sexual or emotional relationship with a person with whom [they] come into contact in the course of [their] work who may be vulnerable to an abuse of trust or power”.

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<sup>15</sup> *The abuse of police powers to perpetrate sexual violence*, jointly published by IPCC and ACPO (now the National Police Chiefs’ Council), September 2012. Available at: [www.ipcc.gov.uk/sites/default/files/Documents/research\\_stats/abuse\\_of\\_police\\_powers\\_to\\_perpetrate\\_sexual\\_violence.PDF](http://www.ipcc.gov.uk/sites/default/files/Documents/research_stats/abuse_of_police_powers_to_perpetrate_sexual_violence.PDF)

<sup>16</sup> Code of Ethics – A Code of Practice for the Principles and Standards of Professional Behaviour for the Policing Profession of England and Wales, College of Policing, London, July 2014. Available at: [www.college.police.uk/What-we-do/Ethics/Documents/Code\\_of\\_Ethics.pdf](http://www.college.police.uk/What-we-do/Ethics/Documents/Code_of_Ethics.pdf)

The most recent national counter corruption assessment, in 2013, highlighted corruption for the purposes of sexual gratification as a major threat to law enforcement.<sup>17</sup> HMIC's 2015 report *Integrity matters*<sup>18</sup> identified police sexual misconduct as an area of great concern to the public. We share the public's disquiet and so we looked at this 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**

Wiltshire Police understands and takes seriously the potential for its staff to abuse their authority for sexual gain and take a robust approach to those suspected of this type of behaviour. Although the force does not currently have a specific counter-corruption strategy, in April 2015 it published a series of documents highlighting this concern, and developed a behaviour profile to identify staff who may present a risk. This was in response to the September 2012 IPCC report, *The abuse of police powers to perpetrate sexual violence*, which was produced to raise the profile of cases involving the abuse of powers by police officers and staff to perpetrate sexual abuse or violence. The force has looked at good practice from other forces and organisations in producing these documents. This has led to all staff being comprehensively briefed on the standards of behaviour expected and in how to identify staff who may be acting inappropriately.

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

The force does not routinely seek intelligence on potential abuse of authority for sexual gain from external sources such as women's refuges, websites and gymnasiums. It does, however, have dedicated officers who engage with sex workers in Swindon, and part of their role is to identify potential corruption in this area. The force has the ability to monitor use of IT systems to look for suspicious patterns of behaviour. This is supported by a sexual predator risk matrix, developed as part of a behaviour profile, which is used as a reactive tool once a risk has been identified. Suspicious behaviour is generally identified through either intelligence gleaned during other unrelated investigations or confidential reporting from colleagues or from victims. These suspicions are then treated either as a formal

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<sup>17</sup> Every three years, the National Counter Corruption Advisory Group commissions a strategic assessment of the threat to law enforcement from corruption. The most recent assessment was completed in June 2013 by the Serious Organised Crime Agency. The assessment was based upon three years of intelligence reports on possible corruption gathered by forces in England and Wales, supplemented by information from other forces and national agencies.

<sup>18</sup> *Integrity matters*, HMIC, January 2015. Available from: [www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/](http://www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/)



complaint and dealt with under police misconduct regulations or are investigated as a criminal offence. A decision as to the most appropriate course of action to be taken is made by the professional standards department.

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

Force guidance is clear and it is emphasised during regular interactions between chief officers and staff as well as during annual appraisals. In addition, guidance is promoted through prominent posters telling staff they must not use their professional position to establish or pursue a sexual or improper emotional relationship with any current or former victim, offender or witness, or use their contact with them to pursue a relationship with someone close to them. It goes on to say that staff must not give out any personal telephone numbers or other personal contact details (e.g. social networking details) to any victim, offender or witness or enter into inappropriate communication including the use of text messages or any social networking site.

Training delivered by the force to raise awareness of this problem is based around the force's values and provides staff, including line managers, with information to help identify early warning signs. The counter-corruption unit reinforce this message on a regular basis, through personal visits to local policing areas and through educating managers about the warning signs and the mechanisms for reporting. Furthermore, the force actively publishes cases of misconduct on its intranet in order to raise awareness throughout the workforce.

### **Building public trust**

The force routinely publishes the outcomes of misconduct investigations, which includes those involving staff who have abused their authority for sexual gain. There were no specific examples of initiatives to reassure communities following sexual abuse by officers and staff, and the force acknowledges that more could be done. It is currently developing mechanisms to work with people such as domestic abuse victims and those who may have less trust and confidence in the police.

## **How well does the force engage with the public and its workforce about the outcomes of misconduct and corruption cases?**

HMIC's 2014 literature review on police integrity and corruption emphasised the importance of collection and dissemination of information about misconduct to the public, on the basis that it shows police forces are taking the problem seriously, and detecting and punishing wrongdoing.<sup>19</sup> This information also forms the basis for deterring misconduct and enhancing integrity within police forces themselves. This year, HMIC looked at how well forces engage with the public online and through police officer misconduct hearings in public, and also more widely following high profile incidents with the potential to undermine public perceptions of police integrity. We also looked at how aware the workforce is of these outcomes.

### **Working with the public**

The force communicates with the public about the outcomes of misconduct and corruption cases for all staff and details of gross misconduct cases are published on the force website. The website tells the public how to attend hearings and where they are being held. The professional standards department ensures that the College of Policing is swiftly notified of any disapproved officers.

The force uses complaints as a way of improving its service to the public. In particular, it has publicised the lessons learned from high-profile incidents in which failings were identified, and has then highlighted actions it has taken to provide a better service. This has included arranging for victims to attend force training to give officers their personal perspective of the service they received after a crime.

### **Working with the workforce**

The force shares the outcomes of misconduct and corruption cases with staff via force bulletins. However, this appears to be intermittent, and police officer misconduct cases are published more frequently than police staff cases.

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<sup>19</sup> *Literature review – Police integrity and corruption*, HMIC, January 2015. Available at: [www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/](http://www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/)

## Summary of findings



**Good**

The force is good at ensuring that its workforce behaves ethically and lawfully. It operates a comprehensive vetting process and a higher level of vetting is applied to roles that represent a greater risk to the organisation. The annual appraisal process includes a requirement to discuss any changes in personal circumstances, in line with force policy.

The values and behaviours expected of staff are clearly understood. They feature in annual appraisals and training sessions, and the force routinely checks the integrity of the workforce and its behaviours. However, the force does not have a counter-corruption strategy to identify future risks to the organisation. It is possible to report wrongdoing anonymously and there is support available for those wishing to do so. The force has a code of ethics committee, which makes decisions around ethical dilemmas that may affect the morale or wellbeing of the workforce. This subsequently informs force training and the chief constable's road shows. The public have access to misconduct hearings and the force publishes the outcomes of such cases.

### Areas for improvement

- Annually, the force should produce a local counter-corruption strategic assessment and control strategy, to identify risks to the force's integrity.

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

A workforce that feels it is treated fairly and with respect by its employers is more likely to identify with the organisation, and treat the public in a similarly fair and respectful way. Conversely, perceived unfairness within police organisations can have a detrimental effect on officer and staff attitudes and behaviours.<sup>20</sup> As such, this concept of ‘organisational justice’, and its potential impact on ‘procedural justice’ forms an important part of HMIC’s assessment of police legitimacy. As there is no comparative data on how fairly officers and staff perceive forces to have treated them, we focused our assessment on how well forces identify these perceptions within their workforces and act on these findings. In particular, we looked at the extent to which organisational ‘fairness’ is reflected through the way individual performance is managed, and how ‘organisational respect’ is reflected through how forces provide for the wellbeing of their workforces, particularly through preventative and early action.

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

Research suggests that forces that involve officers and staff in decision-making processes, listen to their concerns, act on them, and are open about how and why decisions were reached, may improve workforce perceptions of fair and respectful treatment.<sup>21</sup> On this basis, HMIC assessed how well the force engages with its staff to identify and understand the issues that affect them, and how well it acts on these issues and demonstrates it has done so.

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<sup>20</sup> *Fair cop 2: Organisational justice, behaviour and ethical policing*, College of Policing, 2015.

Available at:

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

*Organisational justice: Implications for police and emergency service leadership*, Herrington C and Roberts K, AIPM Research Focus, Issue 2, 2013. Available at: [www.aipm.gov.au/wp-content/uploads/2013/08/Org-Justice-Final.pdf](http://www.aipm.gov.au/wp-content/uploads/2013/08/Org-Justice-Final.pdf)

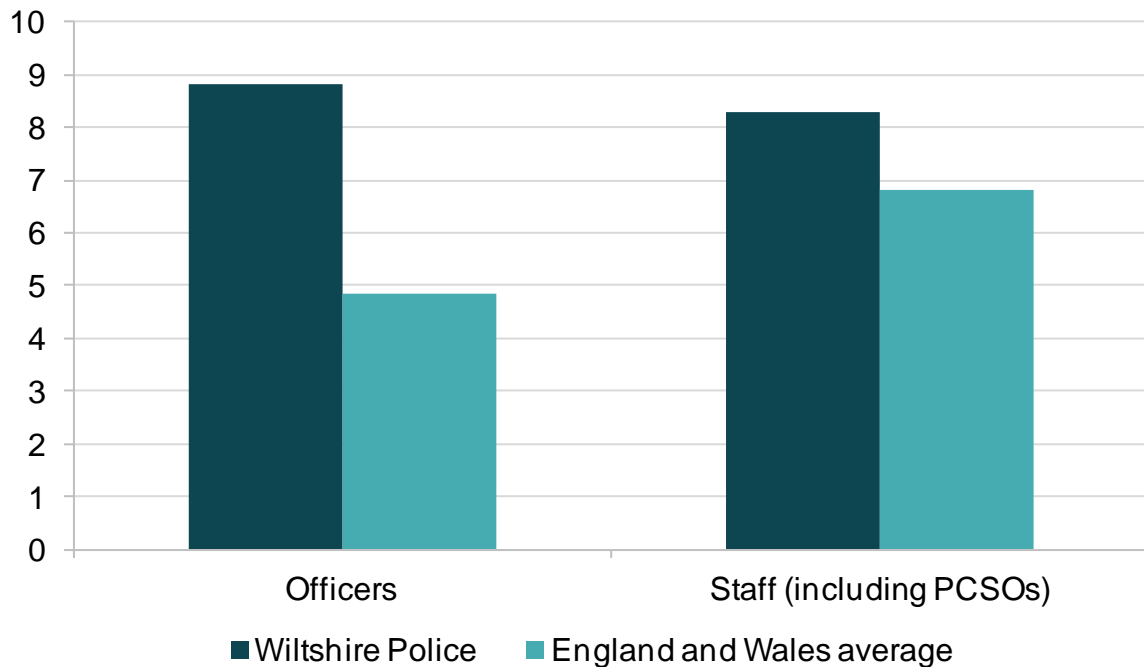
<sup>21</sup> *Fair cop 2: Organisational justice, behaviour and ethical policing*, College of Policing, 2015, page 11. Available at:

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

## Identifying and understanding the issues

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 Wiltshire Police finalised compared with England and Wales, in the 12 months to 31 March 2016**



**Source: HMIC Legitimacy data collection**

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

In the 12 months to 31 March 2016, Wiltshire Police finalised 8.8 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 8.3 formal grievances raised by staff per 1,000 staff (including PCSOs), which was broadly in line with the England and Wales average of 6.8 per 1,000 staff (including PCSOs).

Wiltshire Police regularly uses a variety of methods, from staff surveys to chief officer web chats, to seek the views of the workforce. Staff can post questions to the chief constable, anonymously if they wish, on any issue. The chief constable and the chief officer team have created a culture of challenge and open communication. All questions and answers from the chief officers' web chats are posted online. Challenges have ranged from questions about chief officers' gifts and hospitality to new ways of working and grievance procedures. These web chats are used frequently and, as a result, staff feel they are being listened to and involved. Without exception, everyone spoken to during the inspection commented on positive improvements to the force culture and told us that they are treated fairly and with

respect. Staff told us that if they had a problem or issue they could raise this in a number of different ways, and that they would be listened to. One example given was the representation of black, Asian and minority ethnic (BAME) staff at force meetings. Before the launch of the values and behaviours and the chief officer's web chats, only a handful of BAME staff would attend the meetings. Now there is regular full attendance and this was felt to be a direct result of the new, open culture within the force.

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

The force tries to improve staff's perception of fair and respectful treatment by analysing the results of the annual staff surveys. These results feature on the agenda of the chief constable's roadshows and are published via his online web chats. The surveys have been conducted for the past eight years. The force decided not to conduct a full staff survey in 2015; instead, the chief constable held a series of face-to-face meetings with all supervisors and managers. The open two-way challenge culture in these staff seminars helps to improve staff perceptions of fairness and respect. In one of the chief constable's roadshows, a question was asked about the dog handler shift pattern for Wiltshire. As a result of the conversation the shift pattern was changed within a day to fall in line with other officers involved in such work. Another example was a change to the authorisation process for payment of expenses, which, as a result of a suggestion on the web chat forum, only requires a single line manager endorsement. This reduces the time taken to pay staff and removes an unnecessary level of bureaucracy.

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

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

### **Understanding and valuing the benefits**

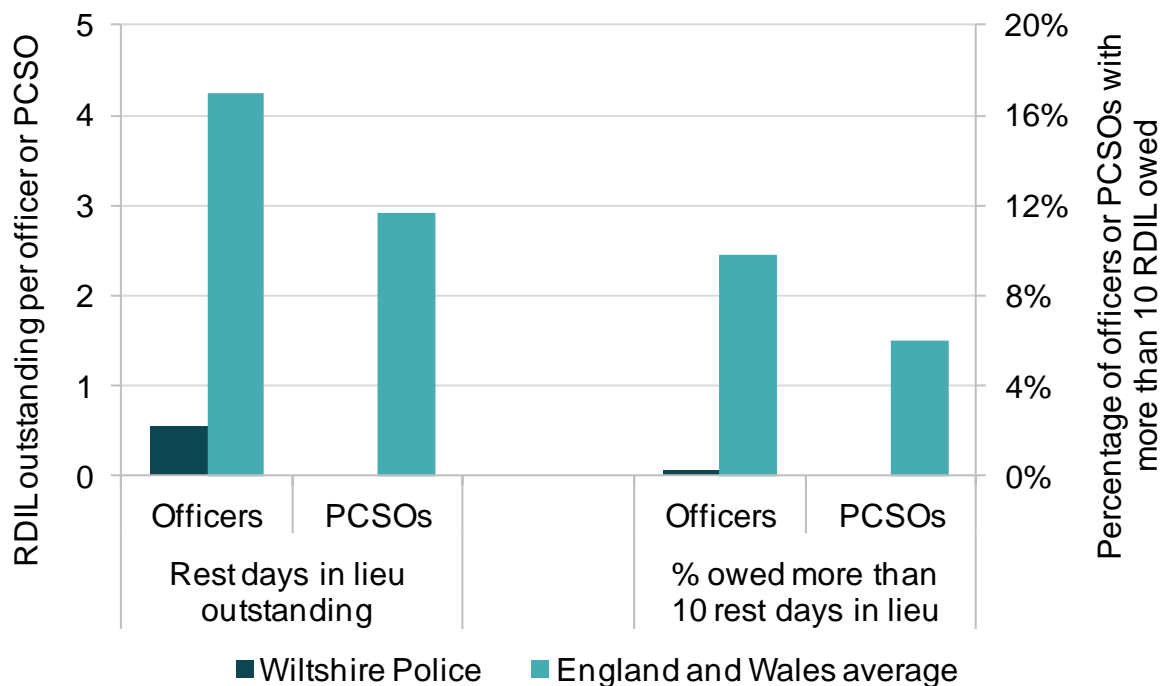
The force understands and values staff wellbeing. A mental health nurse has been appointed, and occupational health services are available to all staff. In addition, the force has introduced a confidential care line for people to access advice and counselling on a range of issues, such as debt counselling. This service has been promoted through leadership training where responsibility for the welfare of staff is

made clear to all supervisors and managers. The National Institute for Health and Clinical Excellence guidelines are used as a framework within the occupational health unit (OHU).

### 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 due to operational reasons. Long working hours can have a detrimental impact on the health and wellbeing of the workforce, so it serves as a useful point of comparison for assessing the extent to which the force is managing the wellbeing of its workforce. Analysis of the numbers of RDIL accrued, but not yet taken, can be useful tools for forces to identify and understand potential wellbeing concerns for individuals and teams.

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



Source: HMIC Legitimacy data collection

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

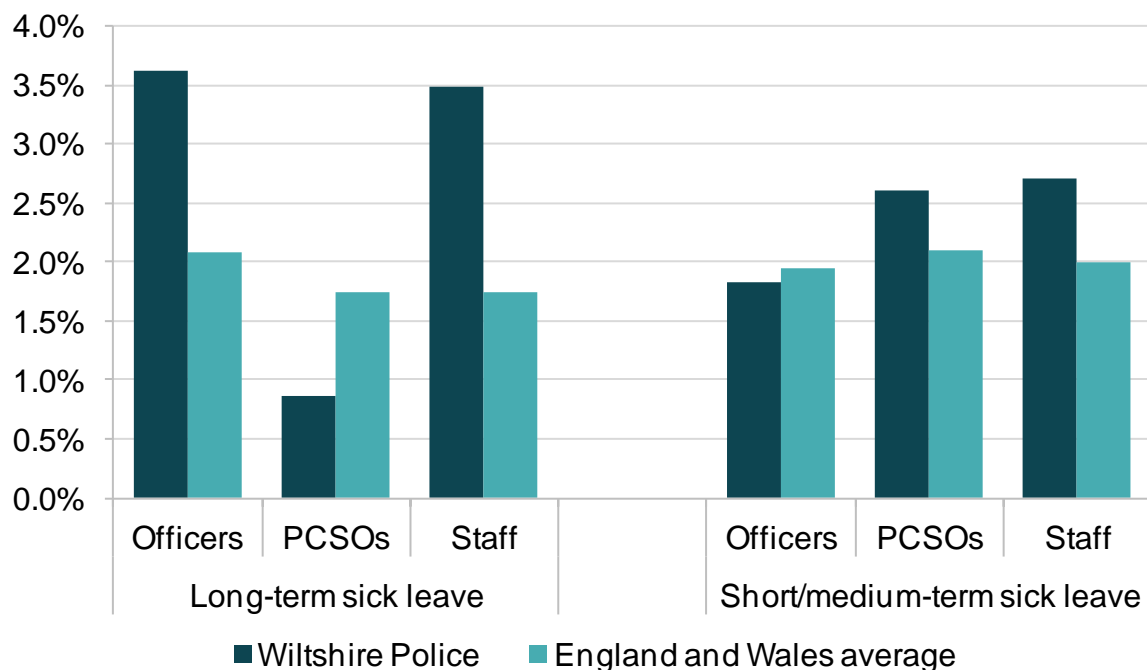
As at 31 March 2016, there were 0.6 rest days in lieu outstanding per officer in Wiltshire Police, which was lower than the England and Wales average of 4.2 days per officer. On the same date, there were no rest days in lieu outstanding per PCSO in the force, which was lower than the England and Wales average of 2.9 days per PCSO. As at 31 March 2016, 0.3 percent of officers in Wiltshire Police had more than 10 rest days in lieu owed to them, which was lower than the England and Wales

average of 9.8 percent. As at 31 March 2016, no PCSOs in Wiltshire Police 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.

Wiltshire Police takes positive action to identify and understand the wellbeing needs of its workforce. Staff occupying certain specialist roles are referred to OHU on an annual basis. The force also records the number of referrals made each year to the OHU, as well as sickness trends, self-referrals, assaults on officers and the location of those self-referring. The health and wellbeing board, chaired by the chief constable, provides a corporate governance function. The OHU looks at annual leave to establish if, and how, it is being used, and to analyse individual lifestyle needs. Staff with specific difficulties receive positive support and reasonable adjustments from the force. This makes a significant and positive difference to professional and personal lives.

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 Wiltshire 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.

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

1.8 percent of officers were on short or medium-term sick leave, which is broadly in line with the England and Wales average of 2.0 percent.

0.9 percent of PCSOs were on long-term sick leave, which is broadly in line with the England and Wales average of 1.7 percent.

2.6 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.

3.5 percent of staff were on long-term sick leave, which is higher than the England and Wales average of 1.7 percent.

2.7 percent of staff were on short or medium-term sick leave, which is higher than the England and Wales average of 2.0 percent.

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

Wiltshire Police demonstrates that it understands and values the benefits of workforce wellbeing by including the subject in its leadership programme. Staff taking part in the leadership programme clearly understand the importance of staff wellbeing and the benefits to both the force and the public. On the force leadership website, there are management of sickness guides for supervisors to use. The OHU places articles in the staff magazine, *First Beat*, on the benefits of staff keeping fit and healthy. The force is aware of the higher levels of sickness among staff and higher long-term sickness among police officers, compared to the England and Wales averages. Force analysis has identified that one of the key drivers is long-term psychological illness, particularly among police officers. The business intelligence, human resources and OHU departments are working together to address these issues.

## **How fairly and effectively does the force manage the individual performance of its officers and staff?**

College of Policing research on organisational justice suggests that lack of promotion opportunities and not dealing with poor performance may adversely affect workforce perceptions of fairness, which in turn may lead to negative attitudes and behaviours in the workplace.<sup>22</sup> HMIC assessed how fairly and effectively the force manages the individual performance of its officers and staff, including the extent to which the process aligns with guidance produced by the College of Policing.<sup>23</sup>

### **The performance assessment process**

Wiltshire Police has an established performance assessment process that members of staff consider to be fair and effective. Supervisors now receive training on the force's leadership courses on how to conduct PDR assessments. PDR interviews are conducted quarterly and recorded using an online system called 'i-perform'. Performance assessments are used in the promotion process to identify individuals for senior roles. The objectives within the PDR are set against force values and behaviours. Research is conducted to identify both those who are high performers and those underperforming.

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

The force knows which staff members are in the bottom 5 percent in performance terms and takes steps to manage their performance. There is an open and honest discussion with those considered to be underperforming, and action plans produced to address issues. Several action plans were reviewed by HMIC staff during the inspection. The force uses 360-degree feedback to measure performance against agreed PDR objectives. Compliance with the PDR process and the quality of assessments is managed and monitored through the PIB by the human resources department.

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

Available at:

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

<sup>23</sup> College of Policing guidance on the police performance development review process is available at: [www.college.police.uk/What-we-do/Support/Reviewing-performance/Pages/PDR.aspx](http://www.college.police.uk/What-we-do/Support/Reviewing-performance/Pages/PDR.aspx)

## Summary of findings



### Outstanding

The force is outstanding in the way it treats its workforce with fairness and respect. It uses a variety of methods to seek the views of staff regularly. These include internal surveys, face-to-face meetings and the chief officer's web chats. The chief constable and the chief officer team have created a culture of challenge and open communication. Without exception, everyone we spoke to during the inspection commented on positive improvements made to the force culture and told us that they are treated with fairness and respect. Officers and staff told us that if they had a problem or concern they could raise this in a number of different ways and that they would be listened to.

The chief constable has conducted road shows, during which he has met every supervisor and manager to ascertain their views on wellbeing, fairness and respect. The force understands and values the wellbeing of the workforce and has a range of processes in place to ensure that they have appropriate support and assistance. For example, the force has introduced a confidential care line where officers and staff can receive counselling and advice on a number of issues. An understanding of wellbeing forms an integral part of the leadership programme. The annual performance and assessment process is effective in supporting high performers within the leadership programme and addressing issues of underperformance through a structured, supportive action plans. This process is viewed by the workforce as being fair and transparent.

## Next steps

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

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

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

## Annex A – About the data

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

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

### Methodology

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

#### Comparisons with England and Wales average figures

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

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

#### Statistical significance

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

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

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

#### Population

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

## Force in numbers

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

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

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

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

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

## Figures throughout the report

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

The Independent Police Complaints Commission (IPCC) defines a complaint for the purposes of recording as "an expression of dissatisfaction by a member of the public with the service they have received from a police force. It may be about the conduct of one or more persons serving with the police and/or about the direction and control of a police force". A police complaint can be about more than one officer or member of staff and can refer to one or more allegations.<sup>24</sup>

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

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<sup>24</sup> *Guidance on the recording of complaints under the Police Reform Act 2002*, Independent Police Complaints Commission. Available at: [www.ipcc.gov.uk/sites/default/files/Documents/statutoryguidance/guidance\\_on\\_recording\\_of\\_complaints\\_under\\_PRA\\_2002.pdf](http://www.ipcc.gov.uk/sites/default/files/Documents/statutoryguidance/guidance_on_recording_of_complaints_under_PRA_2002.pdf)

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