HMICFRS

Her Majesty's Inspectorate of Constabulary
and Fire & Rescue Services

PEEL: Police legitimacy (including leadership) 2017

An inspection of Metropolitan Police Service

Contents

Introduction

As part of its annual inspections into police effectiveness, efficiency and legitimacy (PEEL), HM Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS)[1] assesses the legitimacy and leadership 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). Therefore, it is 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 by 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 why they are making those decisions), as well as being friendly and approachable.[2] This is often referred to as 'procedural justice'. Police actions that are perceived to be unfair or disrespectful can have extremely negative effect on 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 are being treated fairly and respectfully, particularly by their own police force. Therefore, it is important that the decisions made by their force about matters that affect them are perceived to be fair.[3] This principle is described as

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[1] This inspection was carried out before 19 July 2017, when HMIC also took on responsibility for fire & rescue service inspections and was renamed HM Inspectorate of Constabulary and Fire & Rescue Services. The methodology underpinning our inspection findings is unaffected by this change. References to HMICFRS in this report may relate to an event that happened before 19 July 2017 when HMICFRS was HMIC. Citations of documents which HMIC published before 19 July 2017 will still cite HMIC as the publisher.

[2] *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

[3] *Fair cop 2: Organisational justice, behaviour and ethical policing*, College of Policing, 2015. Available at: http://whatworks.college.police.uk/Research/Documents/150317_Fair_cop%202_FINAL_REPORT.pdf

'organisational justice', and HMICFRS considers that, alongside the principle of procedural justice, it makes up a vital aspect of any assessment of police legitimacy.

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 ensure that their workforce behaves ethically and lawfully. In HMICFRS' 2017 legitimacy inspection, we continued our assessment of how well forces develop and maintain an ethical culture and we re-examined how forces deal with public complaints against the police. 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.

As part of this year's inspection, we also integrated aspects of leadership into our assessment of legitimacy, as the two areas are closely linked. We assessed the role that leadership plays in shaping force culture, the extent to which leadership teams act as role models, and looked at how the force identifies and selects its leaders.

While our overarching legitimacy principles and core questions remain the same as last year, our areas of specific focus continue to change to ensure we are able to assess a full range of police legitimacy topics, including emerging concerns or Home Office commissions. As such, it is not always possible to provide a direct comparison with last year's grades. Where it is possible to highlight emerging trends in our inspection findings between years, we do so in this report.

A separate report on the force's efficiency inspection findings is available on our website (www.justiceinspectorates.gov.uk/hmicfrs/peel-assessments/peel-2017/metropolitan/efficiency/). Our reports on police effectiveness will be published in early 2018. Our 2016 reports on forces' effectiveness, efficiency, and legitimacy are available on our website: www.justiceinspectorates.gov.uk/hmicfrs/peel-assessments/peel-2016/metropolitan/.

More information on how we inspect and grade forces as part of this wide-ranging inspection is available on our website (www.justiceinspectorates.gov.uk/hmicfrs/peel-assessments/how-we-inspect/).

Force in numbers

Workforce

Total workforce (full time equivalents) as of 31 March 2017

41,874

Total workforce breakdown (full time equivalents) as of 31 March 2017

officers	staff (including section 38)	PCSOs
31,517	**8,915**	**1,442**

Ethnic diversity

Percentage of BAME in workforce 31 March 2017

overall workforce

16.7%

officers	staff	PCSOs
13.3%	**25.5%**	**37.8%**

Percentage of BAME in local population, 2011 Census

40.2%

Gender diversity

Percentage of females in overall workforce 31 March 2017

Metropolitan Police Service	England and Wales population, 2015 estimate
33%	**51%**

Percentage of females by role 31 March 2017

Metropolitan Police Service

officers	staff	PCSOs
27%	**58%**	**36%**

Grievances

Number of grievances per 1,000 workforce raised and finalised 10 months to 31 March 2017

	Metropolitan Police Service	England and Wales force average
Officers	5.4	4.1
PCSOs	11.1	4.4
Staff	9.5	6.2

Stop and search

Number of stops and searches carried out in 2015/16 (excluding 'vehicle only' searches)

153,750

Number of stop and searches per 1,000 population in 2015/16

	Metropolitan Police Service	England and Wales force average
	17.7	4.8

Note: All figures exclude section 38 staff unless stated otherwise. For further information about the data used, including information about section 38 staff, please see annex A.

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

Overall judgment[4]

⬤⬤⬤◯ **Good**

The Metropolitan Police Service is judged to be good in how legitimately it keeps people safe and reduces crime. For the areas of legitimacy we looked at this year, our overall judgment is the same as last year. The force is judged to be good at treating all of the people it serves with fairness and respect and ensuring its workforce behaves ethically and lawfully, but judged to be requiring improvement in some elements of treating its workforce with fairness and respect.

Overall summary

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

⬤⬤⬤◯ **Good**

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

⬤⬤⬤◯ **Good**

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

⬤⬤◯◯ **Requires improvement**

The Metropolitan Police Service is good at treating all the people it serves with fairness and respect. Force leaders show the value and benefits of procedural justice and the force ensures the workforce understands its importance. The force provides unconscious bias training, but understanding of unconscious bias varies throughout the organisation. It also provides communications training to improve how its officers interact with the public. Internal and external scrutiny of use of force is good and the force is compliant with the national recording standard. All aspects of the force's arrangements for the use and scrutiny of stop and search are impressive.

The force is good at ensuring its workforce behaves ethically and lawfully. It is co-founder of the London police challenge forum, which considers and advises on ethical dilemmas. Force leaders regularly clarify, and reinforce understanding of, what behaviour is considered acceptable and unacceptable, and are open to

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[4] HMICFRS judgments are outstanding, good, requires improvement and inadequate.

challenge about their decision making. The force has an achievable plan for carrying out re-vetting to ensure all vetting is up to date, and has made good progress against the other areas for improvement noted in our 2016 legitimacy report. The public can make complaints in different ways, although information about written complaints is not consistently made available to the public and is not targeted at communities who are reluctant to complain. We were not told of any formal process for additional assistance being offered to complainants, and records of keeping complainants updated are poor. The workforce understands discrimination. The force has reviewed its grievance procedure and is continuing its work to increase the workforce's trust and confidence in this process.

The force needs to improve the way it treats its own workforce. It continues to offer its personnel many ways to provide feedback. It has carried out work to identify any unfairness in its recruitment, promotion and misconduct processes, and has taken action when needed. Some progress has been made in the areas that our 2016 legitimacy report noted as requiring improvement, including piloting a new performance appraisal process, and in general the changes made have been well received. However, the workforce has low levels of trust and confidence in its leaders and morale appears to be at a three-year low. The force continues to have good provision of workforce wellbeing.

Areas for improvement

- The force should ensure that all officers and staff have a good understanding of how to recognise and overcome unconscious bias when making decisions and during interactions with the public.

- The force should ensure that the complaints process is fully accessible to the public, including those people who may require additional assistance, and those who may have less trust and confidence in the police.

- The force should ensure that it provides complainants with meaningful updates consistently, and records information about the updates in its complaints database.

- The force should ensure that cases of discrimination that do not meet the IPCC referral criteria are not referred to the IPCC and that all such cases are dealt with properly at a local level.

- The force should improve the way that it communicates with the workforce to increase trust and confidence in its leaders, and should provide feedback when it has listened and responded to staff concerns.

- The force should ensure that awareness of unconscious bias is reinforced among supervisors and that they have regular access to guidance to help them to make decisions with confidence about allegations involving BAME officers and staff.

- The force should ensure that it understands and monitors the impact of the build-up of the daily pressures of policing on the workforce and takes an effective, early-action approach towards reducing this pressure.

- The force should ensure that the workforce clearly understands its approach to the current and pilot appraisal processes. It should also consider how best to improve the current process until such time as the new one comes into effect.

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 their reasons openly and clearly), while being consistently friendly and approachable.[5]

While HMICFRS recognises that police legitimacy stems from broader experiences of the police than by direct contact alone, our inspection focuses specifically on assessing the extent to which forces make fair decisions and treat people with respect during their interactions with the public. To do this, we looked at how well leaders can demonstrate the importance they place on procedural justice and how well the workforce understands these principles and applies them. Also, we assessed how well the force scrutinises the extent to which procedural justice takes place, particularly with regard to coercive powers, including the use of force and stop and search.

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

HMICFRS assessed the extent to which leaders of the force understand the importance of procedural justice, and the arrangements they have made to provide the workforce with the knowledge, skills and understanding they need to treat all the people they serve fairly and with respect. We examined the workforce's understanding of the principles of procedural justice (being friendly and approachable, treating people with respect, making fair decisions, and taking time to explain these decisions). We did this by checking their understanding of the concept of unconscious bias,[6] their awareness of effective communication skills[7] in all

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[5] *It's a fair cop? Police legitimacy, public cooperation, and crime reduction*, National Policing Improvement Agency, September 2011. Available from: http://whatworks.college.police.uk/Research/Documents/Fair_cop_Full_Report.pdf

[6] Personal biases are influenced by factors including people's background, personal experiences and occupational culture, and they can affect our decision-making. When we make quick decisions, these biases can, without us realising, disadvantage particular groups of people. It is vital that police officers understand their own biases and how to overcome them, to ensure the decisions they make are fair.

[7] Research into the effect of communication skills training in Greater Manchester Police (e.g. showing empathy, building rapport, signposting and using positive and supportive language) showed this improved officer attitudes and behaviours and had a "significant positive effect" on the quality of interactions between police officers and victims. See: http://library.college.police.uk/docs/college-of-policing/Technical-Report.pdf

interactions with the public and their appropriate use of coercive powers (with a specific focus on stop and search and use of force).[8]

Understanding the importance of treating people with fairness and respect

The importance of procedural justice is clearly understood by leaders in the Metropolitan Police Service. Since 2015, work on promoting the Code of Ethics[9] throughout the force has continued. The force's organisational values of integrity, professionalism, courage and compassion reflect the Code and support its goal of making London the safest global city. The force's professionalism board and the assistant commissioner for professionalism direct activities to raise the workforce's awareness of the Code of Ethics and the force's values, which are also available on the force intranet and displayed on posters in force buildings. Training on the Code of Ethics is provided in several ways, including face-to-face and remote electronic learning. In our inspections in 2015, 2016 and 2017, we found knowledge of the Code of Ethics to be widespread among the people to whom we spoke throughout the force. The importance of treating people with fairness and respect is also widely understood, although this does not always extend to less obvious situations, such as the provision of a poor level of service. One example we saw involved members of the public having to wait too long to be seen at a public counter. In another, new ways of working have resulted in delays in officers attending some incidents, meaning that the person who made the report is kept waiting for longer than they should be.

Understanding of unconscious bias

The force provides training so that officers, staff and volunteers, such as special constables, are able to recognise and overcome unconscious bias. This is most notable in the training provided to new recruits, newly promoted officers, detectives, and those who investigate grievance cases and allegations of misconduct. One example we were given showed that a registered sex offender who was a victim of crime would be treated the same as other victims. Unconscious bias is one of the main areas covered in stop and search training and those who receive this training remember it well. However, understanding throughout the force varies, particularly among those who do not recall receiving recent, or indeed any, awareness training. These include frontline officers and staff who have direct contact with the public, and

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[8] *Authorised Professional Practice on Stop and Search*, College of Policing, February 2017. Available from: www.app.college.police.uk/app-content/stop-and-search/; *Authorised Professional Practice on Use of Force*, College of Policing, October 2013. Available from: www.app.college.police.uk/app-content/public-order/core-principles-and-legislation/police-use-of-force; and *College of Policing and National Police Chiefs' Council, Personal safety manual*, 2016. 2016. Available from: http://library.college.police.uk/docs/college-of-policing/PSM/PSM-MOD-01-INTRODUCTION.pdf

[9] *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, 2014. Available from: www.college.police.uk/What-we-do/Ethics/Pages/Code-of-Ethics.aspx

also supervisors. Nonetheless, some of those who had not received training were able to describe the concept of unconscious bias. The force should ensure that awareness of unconscious bias is reinforced throughout the workforce, so that they can avoid bias when making decisions and interacting with the public.

Communication skills

The force provides training in communication skills to improve how its officers interact with the public. This was most notable in the training provided to new recruits, newly promoted officers and detectives. The force places great emphasis on effective communication in stop and search training because it is committed to achieving the highest levels of public confidence in its use of these powers. Although the force does not provide specific refresher training in communication skills, it is included in the two-day safety training that officers are required to attend each year. The importance of good communication is emphasised to police staff, such as those working in Metropolitan communications command. However, this is done by remote computer-based learning, which staff do not see as an effective learning tool, or by email briefings, which staff do not have time to consider fully because of the number of calls they need to deal with, thus limiting its efficacy. Despite this, all the people with whom we spoke recognised the importance of effective communication.

Use of coercive powers

The force provides training in the use of coercive powers to ensure that they are used fairly and respectfully. Use of force training, based on the College of Policing's Authorised Professional Practice (APP), is given to all new recruits, including special constables. The National Decision Model (NDM)[10] and Code of Ethics are included in this training. Information and guidance on the use of coercive powers is readily available on the force intranet and is reinforced in compulsory officer safety training. The officers we spoke with have a high level of understanding of the fair, respectful, legal and professional use of their powers.

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[10] The National Decision Model is the framework by which all policing decisions should be made, examined and challenged. The Code of Ethics is a central component of the National Decision Model.

How well does the force understand the extent to which its workforce treats people with fairness and respect?

HMICFRS continues to examine the extent to which forces work to identify and understand what affects people's perceptions of fair and respectful treatment. This year we re-assessed a specific aspect of fair and respectful treatment that we examined in PEEL 2015: the use of force[11] and stop and search powers. Specifically, we inspected the extent to which forces record data and how well they scrutinise data and other information, including through external scrutiny,[12] to understand and improve the use of these powers. In the case of stop and search, the next section sets out our findings. It includes our assessment of the reasonableness of recorded grounds for stop and search.

Scrutiny of use of force

The Metropolitan Police Service is compliant with the national recording standard on the use of force. The system for collecting the dataset required by the standard was put into operation in April 2017, and the first report will be available in July 2017. In our 2015 legitimacy report, we found: Taser-trained officers understand how to apply the NDM when considering whether to use Taser; the level and standard of the force's supervision of its use of Taser is rigorous; and the force provides extensive information to the public about its use of Taser. This led us to conclude that use of Taser was fair and appropriate in the force.

The legitimacy 2017 inspection considered the scrutiny of all uses of force, irrespective of where they occurred or in what circumstances. This inspection found that the force maintains comprehensive data on all types of use of force, including firearms, baton, handcuffs, leg restraints, arrest, incapacitant spray and control and restraint techniques, and scrutinises it regularly and frequently. The data are reviewed at the force-wide monthly use of force monitoring group meetings, chaired by the commander (who is the force and national lead in this area). Use of force data are also grouped by the age and ethnicity of those subject to its use, and by

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[11] In 2015 HMICFRS found a generally positive picture of force oversight arrangements for use of Taser. However, in 2016, we found that many forces did not have similar levels of oversight for other types of use of force. As a result of a review undertaken by the National Police Chiefs' Council, all forces have been required to collect a minimum data set in respect of use of force since April 2017. The review is available from:
www.npcc.police.uk/documents/uniformed/2016/Use%20of%20Force%20Data%20Report%20to%20Home%20Sec.pdf. Also see *Authorised Professional Practice on Use of Force*, College of Policing, October 2013. Available from: www.app.college.police.uk/app-content/public-order/core-principles-and-legislation/police-use-of-force/

[12] *Independent Advisory Groups: considerations and advice for the police service on the recruitment, role and value of IAGs*, College of Policing, 2015. Available from: www.college.police.uk/What-we-do/Support/Equality/Documents/Independent_advisory_groups_advice_2015.pdf

individual officers, to assess whether force is used fairly. The force has not completed its issue of body-worn video cameras but so far has issued 11,000 to frontline officers out of a total of 22,000 units purchased. The scrutiny of use of force data, including information about complaints, is used to improve individual and organisational learning; the force is considering how to add the review of body-worn video footage to the scrutiny process.

In June 2017, Her Majesty's Inspectorate of Prisons and HMICFRS inspected nine of the force's custody suites as part of the programme of unannounced inspections of police custody facilities carried out jointly by the two inspectorates. The inspection included a detailed audit of use of force case files and CCTV footage. The inspection also assessed the proportionality of the force used against those detained in police custody compared to the threat that they posed, how restraint is applied, attendance at use of force training by officers and pass rates, and the monitoring of use of force in custody. This inspection highlighted three areas for improvement in the custody suites inspected, further details of which can be found in the resultant report.[13] The force is also trialling the use of spit hoods in one of its custody suites and will consider extending their use to the other custody suites once the pilot has been evaluated.

External scrutiny

There are many opportunities for the public to join an external scrutiny group at a local level. For example, each borough works with an independent advisory group that looks carefully at the force's activities, such as the trial of spit hoods in one custody suite, and advises how these may be, or are being, perceived by communities. The force seeks the groups' advice about critical incidents, major investigations and planned operations. Independent advisers help to ensure that these activities have the support of the community and that any community resources are identified. These advisers may also be able to alert the force to any negative effects of proposed actions, thereby helping to prevent tension from arising between the force and the communities it serves.

We observed two groups as part of our inspection. The chair and membership were independent of the police, and the meetings were well attended by a diverse mix of people. One of the groups included a number of young people. Its members were confident about challenging the information provided to them. A senior officer was present at both meetings and engaged effectively with the members. Local officers also provide support to the groups, for instance by typing and circulating meeting minutes and actions. The meeting formats included a review of the matters arising

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[13] *Report on an unannounced inspection visit to police custody suites in Metropolitan Police Service North and North East clusters,* HM Inspectorate of Prisons and HM Inspectorate of Constabulary and Fire & Rescue Services, 2017. Available at: www.justiceinspectorates.gov.uk/hmiprisons/inspections/metropolitan-police-service-north-and-north-east-clusters/

from the previous meeting and the actions taken to respond to them. Other mechanisms used to provide updates from the meetings to the wider community include Twitter, newsletters and the borough commander's blog. The chairs asked members to encourage others in the community to join their local advisory group. On its website, the force also publicises how members of the public can join a local group.

In addition to the external scrutiny groups that the public can join, the force also uses the public attitude survey to seek feedback from the public. The survey is designed by the Mayor's Office for Policing and Crime (MOPAC) and is carried out each quarter. A market research company conducts 12,800 face-to-face interviews throughout the year on behalf of the force. The survey measures public confidence in the force based on four principal factors: engagement; fair treatment; anti-social behaviour reduction; and crime reduction. The main factor is fair treatment. The force uses the survey results to shape its engagement activities and to measure their effect on fair treatment and on other factors that affect confidence. It also has a scheme called 'Rate my PC', which invites the public to submit feedback about the attitude and behaviour of individual constables with whom they have contact. Respondents complete and return a calling card that the constable attending an incident is required to leave with them.

How fairly does the force use stop and search powers?

The purpose of stop and search powers is to enable officers to eliminate or confirm suspicions that individuals may be in possession of stolen or prohibited items, without exercising their power of arrest. Except in exceptional circumstances, an officer must have reasonable grounds for carrying out such a search. While this can be valuable in the fight against crime when based on genuinely objective reasonable grounds, the powers to stop and search people are some of the most intrusive available to the police. Their disproportionate use in respect of black, Asian and minority ethnic communities threatens to undermine police legitimacy. As such, it is crucial that all forces use these powers fairly, and demonstrate to the public that they are doing this.[14]

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[14] *Authorised Professional Practice on Stop and Search*, College of Policing, February 2017. Available from: www.app.college.police.uk/app-content/stop-and-search/

HMICFRS has assessed the police's use of its stop and search powers on a number of occasions.[15] Our 2015 legitimacy inspection[16] found that too many forces were not always recording reasonable grounds on their stop and search records. In 2017, we reviewed the reasonableness of the grounds again to assess how fairly forces are using stop and search in line with national guidance.[17] Also, we assessed how the forces scrutinise use of these powers.

Understanding of national guidance

The Metropolitan Police Service provides thorough training in the use of stop and search to ensure that it is used fairly and respectfully. The training is based on the College of Policing's APP and is given to all new recruits, including special constables. The NDM and Code of Ethics are included in this training. Information and guidance on the use of stop and search are readily available on the force intranet. Those we spoke with had a high level of understanding of the fair, respectful, legal and professional use of stop and search, and all of them were aware of the APP. A web and mobile phone application-based learning resource is also to be introduced, which consists of videos that are broken down into short sections and can be easily assimilated. The force has also introduced what it calls the 'stop and search judgment range', in which participants play the role of an officer considering a stop and search, and the decisions they make influence what happens next. This helps to improve understanding about stop and search. The force has developed a comprehensive stop and search training package that includes role play, but it has not been put into practice throughout the force. It may want to consider including this as part of the update of training that is now taking place.

**Monitoring use of stop and search powers to improve treatment**

In order to monitor the use of stop and search powers effectively, forces should use a range of data to help them understand how the powers are being used and the subsequent effect on crime, disorder, and perceptions in the community. In particular, forces should consider whether the use of stop and search powers is disproportionately affecting one group compared with another. In 2015/16, in the local population of the Metropolitan Police Service, BAME people were 1.8 times more likely to be stopped and searched as white people. Black people were 3.3 times more likely to be stopped and searched than white people.

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[15] *Stop and Search Powers – are the police using them effectively and fairly?* HMIC, July 2013. Available at: www.justiceinspectorates.gov.uk/hmicfrs/publications/stop-and-search-powers-20130709/ and *Best Use of Stop and Search revisits*, HMIC, September 2016. Available from: www.justiceinspectorates.gov.uk/hmicfrs/publications/best-use-of-stop-and-search-revisits/

[16] *Police legitimacy 2015 – a national overview*, HMIC, February 2016. Available from: www.justiceinspectorates.gov.uk/hmicfrs/publications/police-legitimacy-2015/

[17] See annex A for more information about the methodology for our review of stop and search records.

Figure 1: Likelihood of black, Asian and minority ethnic (BAME) people being stopped and searched (under section 1, PACE)[18] compared with white people, in the local population of Metropolitan Police Service in the 12 months to 31 March 2016
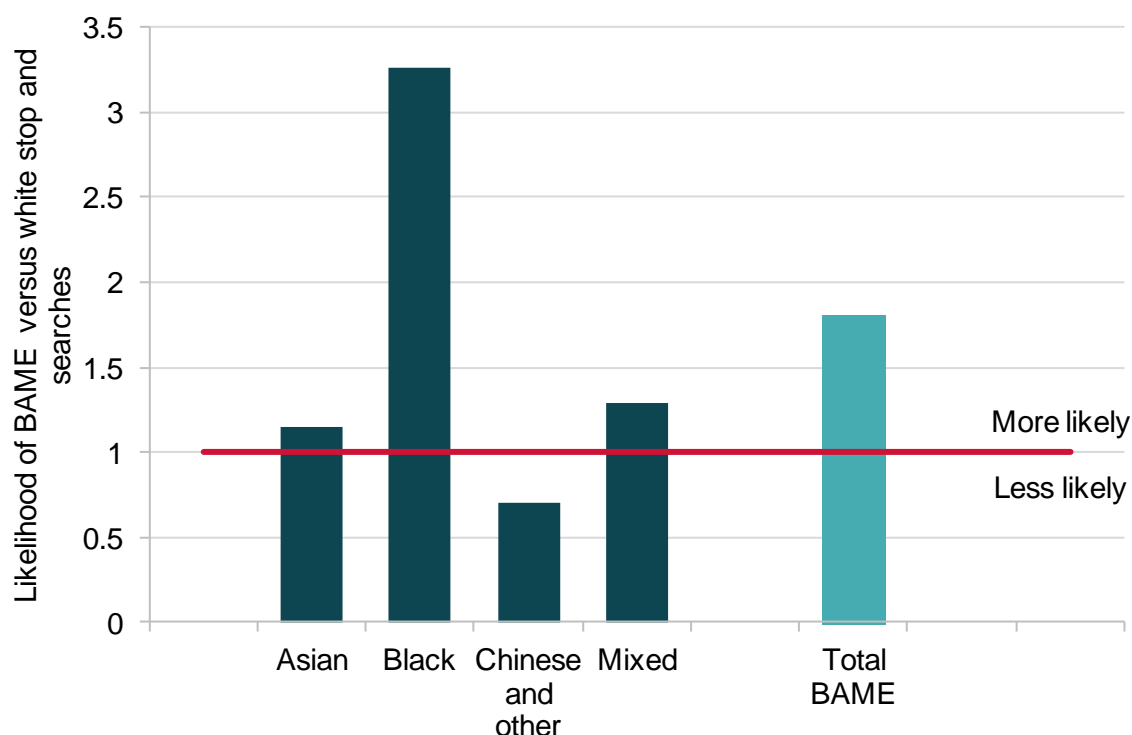
Source: Home Office 2016

The Metropolitan Police Service regularly examines data on the use of stop and search throughout the force at monthly performance meetings chaired by the commander, who is the force's lead for this area. Comprehensive data are produced and reviewed at this meeting. To be sure that certain groups are not being disproportionately stopped and searched, the force cross-analyses stop and search data in a number of ways. This includes analysis by age and ethnicity and by outcome and reason, to assess fairness; and by officer and those that have been stopped and searched, to ensure that officers are not abusing the powers and that individuals are not being targeted unfairly. The force is half-way through rolling out body-worn video cameras to frontline officers. The scrutiny of data, and now of body-worn video footage of stop and search, is used to improve individual and organisational learning. Learning is also drawn from the complaints about stop and search that the force receives.

In our 2015 stop and search report, HMICFRS found that the force was one of about three-quarters of forces that audited the legality of the use of the powers as part of a scheduled audit programme. This work continues. In that report, we also assessed that the force was not complying with one element of the Best Use of Stop and

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[18] Police and Criminal Evidence Act 1984. Available from: www.legislation.gov.uk/ukpga/1984/60/section/1

Search Scheme[19]: it was not publishing data showing the connection, or the lack of one, between the outcome of the search and the original reason for the search. However, when we revisited the force in late 2016, we found it complied with that element of the scheme.

At a local level, supervisors are required to review all stop and search records against a comprehensive checklist, to assess the reasonableness of grounds and correctness of procedures. When video footage is reviewed, the quality of the interaction is also assessed and, if necessary, feedback is given to individual officers to help them improve their use of the powers and so reduce the likelihood of complaints. Learning from the review process is also disseminated throughout the organisation via the stop and search performance group. HMICFRS was impressed by the level of internal scrutiny of stop and search, although an unintended consequence of this scrutiny is that some officers said that the high level of oversight affected their confidence in using the powers.

External scrutiny of stop and search powers to improve treatment

The force is committed to raising levels of trust and confidence within London's communities in its use of stop and search. Each borough has a stop and search community monitoring group whose role is to look at stop and search data and provide feedback to the force. These groups have recently received authority to scrutinise body-worn video footage. The chair and membership are independent of the police and the meetings are attended by a diverse mix of people, although the force would like to see more young people attend. To bridge this gap, officers regularly go into local schools and colleges to ascertain young people's views on stop and search. The monitoring groups and students from a London college have been invited to complete the 'stop and search judgment range' (see page 13) to improve their understanding of officers' decision making. MOPAC has prepared a training presentation to enable the monitoring groups to understand the terminology, forms, information and data concerning stop and search, and to help them to challenge the force appropriately. A senior officer attends the meetings and the minutes show that the matters arising from the previous meeting and the actions taken to respond to them are reviewed. MOPAC has produced terms of reference for the stop and search community monitoring groups that clearly set out what is expected of them, which help the groups to operate consistently.

Each community monitoring group nominates a member to represent the local community at the stop and search community monitoring network. The network is the MOPAC meeting that facilitates community scrutiny of the force's use of stop and search powers throughout London. It also provides the force and MOPAC with a view of the London-wide community, and acts as a central forum for local monitoring groups to discuss their experiences and provide mutual support. The network meets

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[19] The Best Use of Stop and Search Scheme. Available from:
www.gov.uk/government/publications/best-use-of-stop-and-search-scheme

quarterly and the notes from the meetings are published on MOPAC's website. Meetings are attended by representatives from many of the local groups and by senior force officers. The force and MOPAC publish detailed information about stop and search on their websites, which any member of the public can access easily. MOPAC has also produced a leaflet, 'Stop and search know your rights', which is available on its website.

Reasonable grounds for use of stop and search

The Police and Criminal Evidence Act 1984 requires that, to stop and search a person, the grounds to suspect that person of being in possession of a stolen or prohibited article must be reasonable and that the grounds must be recorded on the stop and search record.[20]

In our 2013 inspection into the police use of stop and search powers,[21] we were concerned to see that, of the 8,783 stop and search records we examined across all forces in England and Wales, 27 percent did not include sufficient reasonable grounds to justify the lawful use of the power. For the Metropolitan Police Service, the 2013 inspection showed that 31 of 200 records reviewed did not have grounds recorded that were considered reasonable. In 2015, as part of our PEEL legitimacy inspection,[22] we carried out a further review of the recorded grounds in a sample of stop and search records. In that inspection, our review found that six of 99 records did not have reasonable grounds recorded.

During our 2017 inspection, we reviewed 198 stop and search records of which four did not have grounds recorded that we considered reasonable. While the records we reviewed may not be representative of all stop and search records completed by the force, our findings indicate that, in general, officers understand not only what constitutes reasonable grounds but also how to record them properly.

It is important to note that a lack of reasonable grounds on the stop and search record does not necessarily mean that reasonable grounds did not exist in reality at the time of the stop and search.

In 43 of the 198 records we reviewed, the item searched for was found. This is an important measure because the primary purpose of the powers is to confirm or allay an officer's suspicions. Finding the item searched for is one of the best indications that the grounds for the suspicions are likely to have been strong.

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[20] Police and Criminal Evidence Act 1984. Available from: www.legislation.gov.uk/ukpga/1984/60/contents

[21] *Stop and Search Powers: Are the police using them effectively and fairly?* HMIC, 2013. Available from: www.justiceinspectorates.gov.uk/hmicfrs/publications/stop-and-search-powers-20130709/

[22] *PEEL: Police legitimacy 2015*, HMIC, 2016. Available from: www.justiceinspectorates.gov.uk/hmicfrs/publications/police-legitimacy-2015/

Table 1: Results of HMICFRS stop and search records review 2013-17

	2013	2015	2017
Records not containing reasonable grounds	31 of 200	6 of 99	4 of 198
Item searched for found	-	-	43 of 198

Summary of findings

 Good

The Metropolitan Police Service is good at treating all the people it serves with fairness and respect. Force leaders can demonstrate the value and benefits of procedural justice, and arrangements exist to ensure the workforce has the knowledge it requires. The importance of treating people with fairness and respect is widely understood, although it does not always extend to less obvious situations, such as providing a poor level of service to the public. While the force provides training so that the workforce can recognise and overcome unconscious bias, the level of understanding of unconscious bias varies throughout the organisation. The force provides good communications training, which is reinforced within some teams by remote electronic learning or by email briefings. Both training in, and scrutiny of, use of force are good, and the force is compliant with the national recording standard. HMICFRS is impressed by all aspects of the force's arrangements for training in, and understanding, the use and scrutiny of stop and search.

Area for improvement

- The force should ensure that all officers and staff have a good understanding of how to recognise and overcome unconscious bias when making decisions and during interactions with the public.

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

In HMICFRS' 2017 legitimacy inspection, we continued to focus on the extent to which forces develop and maintain an ethical culture to reduce unacceptable types of behaviour among their workforces. We also returned to look at how well forces are handling complaints and misconduct cases,[23] as opposed to last year's focus on how well forces are guarding against corruption. [24]

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

Research tells us that the best way to prevent wrongdoing is to promote an ethical working environment or culture.[25] Police leaders need to promote ethical principles and behaviour and act as role models, in line with the Code of Ethics.[26] Officers and staff should feel confident that they can apply these principles to their decision-making. This year, we focused on the way that the leaders of forces demonstrate ethical behaviour and the way that forces approach ethical decision-making across the entire workforce. In addition, where forces had failed to comply with all aspects of the national vetting standards in 2016, we assessed whether their plans are credible and are likely to be compliant by December 2018.[27]

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[23] *Police legitimacy 2015 – a national overview*, HMIC, February 2016. Available from:
www.justiceinspectorates.gov.uk/hmicfrs/publications/police-legitimacy-2015/

[24] We did, however, undertake a review of forces' plans in response to our PEEL legitimacy 2016 national report recommendation. The report of our findings is available here:
www.justiceinspectorates.gov.uk/hmicfrs/publications/peel-police-legitimacy-2016/

[25] *Promoting ethical behaviour and preventing wrongdoing in organisations*, College of Policing, 2015. Available from:
http://whatworks.college.police.uk/Research/Documents/150317_Integrity_REA_FINAL_REPORT.pdf
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

[26] 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, 2014. Available from:
www.college.police.uk/What-we-do/Ethics/Pages/Code-of-Ethics.aspx; *Literature review – Police integrity and corruption*, HMIC, January 2015. Available from:
www.justiceinspectorates.gov.uk/hmicfrs/publications/integrity-matters/

[27] HMICFRS' recommendation in December 2016 was that (i) Within six months, all forces not already complying with current national vetting policy should have started to implement a sufficient plan to do so and (ii) Within two years, all members of the police workforce should have received at least the lowest level of vetting clearance for their roles. The ACPO/ACPOS National Vetting Policy was

Leaders as ethical role models

HMICFRS was pleased to see examples of the work that local leaders in the Metropolitan Police Service are doing to create an environment that supports its workforce in making difficult decisions rather than seeking to blame individuals when something goes wrong. With City of London Police and British Transport Police, the force is co-founder of the tri-force London police challenge forum, established in December 2016. It meets quarterly to consider 'ethical dilemmas', which anyone in the three forces can submit, and takes a view on the appropriate approach to these dilemmas. The forum is considering where best to publish the results so that everyone in the three forces can see them. Leaders are being encouraged through training to see the benefits of ethical decision making. The force recently re-designed its promotion process and has made values testing a main module. For example, the middle managers promotion course now includes role-play exercises, designed to stimulate discussions about ethical dilemmas in order to test values. In addition, the force now uses 'values assessments' in its lateral selection process,[28] in which the ethical implications of work-related decisions are considered.

Leaders act as role models for ethical behaviour; the force publishes the registers relating to chief officers' gifts and hospitality and business interests on its public website. Information about the pay and rewards of these officers is published in the force's annual accounts, which are also available on its website. Leaders regularly clarify and reinforce acceptable and unacceptable forms of behaviour, for example on the 'notices' section of the force intranet, through the work of the directorate of professional standards, and in regular staff briefings. In our 2016 legitimacy report, we said the force should produce a local counter-corruption strategic assessment and control strategy every year to identify the risks to its integrity. In response, the force has developed both of these documents and they have recently been approved by its professionalism board.

Ethical decision making

The force's policies and procedures are easily found on the force intranet. All policies and procedures comply with the Equality Duty[29] and reflect the Code of Ethics. The intention is to extend the role of the newly established London police challenge

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replaced in October 2017 by the Vetting Code of Practice and Vetting Authorised Professional Practice. Available from: www.app.college.police.uk/app-content/professional-standards/vetting/

[28] When an officer or member of police staff applies to move into a new role at the same level as their existing role.

[29] The Equality Duty was created by the Equality Act 2010 and places a duty on public bodies and others carrying out public functions. It ensures that public bodies consider the needs of all individuals in their day to day work – in shaping policy, in delivering services, and in relation to their own employees. Available from: www.legislation.gov.uk/ukpga/2010/15/section/149

forum to include it giving advice on force policies and procedures. The force's professionalism board is chaired by an assistant commissioner and oversees all work to promote the Code of Ethics and the force's values.

The prevention and reduction team is part of the directorate of professional standards. The team's responsibilities include providing professional standards training throughout the force, such as on the NDM and ethical decision making. The team provides initial training on ethical decision making to groups including new recruits, volunteers in the Special Constabulary and newly promoted officers, using training material produced by Devon and Cornwall Police. The prevention and reduction team also provides regular training and advice on ethical decision making, including a training programme to reinforce the Code of Ethics, which is part of compulsory officer safety training.

Vetting

It is important for re-vetting to take place regularly and before an individual is promoted or posted to a high-risk unit. During this year's inspection, we asked the Metropolitan Police Service to provide data on the percentage of its workforce that had received up-to-date security clearance. The Metropolitan Police Service could not provide data on security clearances in its workforce as at 31 January 2017, although it stated that, at the time of inspection, work was underway to obtain this information. During our 2016 legitimacy inspection, we considered the extent to which the force was ensuring it was developing and maintaining an ethical culture through effective vetting. We found that the Metropolitan Police Service was not complying with all aspects of the National Police Chiefs' Council's national policy on vetting for the police community, which sets out how often re-vetting should be carried out. The force was re-vetting officers and staff on what it described as a 'business needs basis', which resulted in large numbers of officers and police staff not being re-vetted after their initial vetting expired. During this year's inspection, we assessed the force's plan to deal with this problem and found it has a solid plan to get all re-vetting up to date over the next two years. The plan includes a process of prioritisation, and is well funded and resourced. The force has convened a vetting board to ensure it meets the current national vetting policy; the board's role also

includes considering difficult vetting decisions on a case-by-case basis. Although a backlog in re-vetting remained at the time of our inspection, we consider the force's plan to reduce the backlog achievable.

How accessible is the complaints system to all members of the public?

An accessible complaints system is crucial to building public confidence in the police and to a force's ability to improve the extent to which its workforce acts ethically and lawfully. As such, we assessed how easy it is for the public to make a complaint – including how well forces support those people that may require additional help to gain access to the complaints process.[30] Also, we used a review of case files to assess the level of information provided to complainants and looked at how well forces keep complainants updated about the progress of their complaints.

Ease of making a complaint

The Metropolitan Police Service website provides clear, useful and accessible information about how to make a complaint. Complaints may be made on the website or by telephone, email or through the IPCC. The availability of printed information about complaints, such as leaflets and posters at public counters in police buildings varies, although those we spoke to on duty at the counters were helpful and knowledgeable when explaining the options for making a complaint. MOPAC's leaflet, 'Stop and search know your rights', also sets out how to make a complaint. It is available on MOPAC's website and so may reach some people who have less confidence in the police. However, complaints information is not specifically targeted at those who may be reluctant to complain. The force could not tell us whether similar information is available in non-police premises, such as libraries, community centres and Citizens Advice centres. We think the force could do more to target complaints information at communities that are less likely to make a complaint. The force is working to identify and engage with some hard-to-reach communities and those with less confidence in the police. Examples of this activity include the force's work with young people on stop and search as part of its wider youth engagement strategy.

We saw some evidence of the force offering support to complainants who require additional assistance. Public counters are fitted with hearing loops and personnel dealing with complaints can access Language Line[31] if required. One police station had a separate room where frequently asked questions can be translated into other languages using a computer. As part of the inspection, HMICFRS carried out a case

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[30] These could include people with learning difficulties, mental health issues, young people or people whose first language is not English. *IPCC Statutory Guidance to the police service on the handling of complaints,* IPCC, May 2015. Available from: www.ipcc.gov.uk/sites/default/files/Documents/statutoryguidance/2015_statutory_guidance_english.pdf and *Access to the police complaints system*, IPCC, September 2015. Available from: www.ipcc.gov.uk/sites/default/files/Documents/research_stats/Access_to_the_police_complaints_system.pdf

[31] Language Line is an agency that provides a range of language translation and interpreting services.

file review which included 24 complaints that had been received from the public. This showed that the force provided additional assistance in the one public complaint in which it was required. However, we were not told of any formal processes for offering additional assistance to complainants, and information about how to obtain such assistance could not be found on the force's website. This led us to conclude that the force could do more to publicise the offer of additional assistance to those who need help when making a complaint.

Keeping complainants updated

All complaints that the force receives are assessed initially by the directorate of professional standards' complaints support team, which determines how to deal with the allegations. The file review found that the force provided the correct information to all 24 public complainants via standardised letters. These provided all of the required information, such as a copy of the complaint, how the complaint would be dealt with, contact details for the investigator and information on the right to appeal. The review also found that investigations and reports generally were of a high standard and provided complainants with appropriate outcomes, regardless of whether the central complaints team or one of the 32 boroughs had dealt with them.

In only two of the 24 cases that we reviewed was there a record of the complainant receiving meaningful updates in line with the 28-day deadline. The force attributes its inability to confirm that it provides updates consistently to its current complaints database, which not all those carrying out local investigations can access. The force should improve the way it keeps complainants informed of progress and its recording of updates in the complaints database. The force has invested in a new complaints database, which will be put into operation in two phases; first with the central complaints team and then with users in each borough. This database is due to be start working before the end of 2017 and will enable all those who deal with complaints to record when an update is given to a complainant.

How well does the force identify and investigate potential discrimination by officers and staff?

For the public to have confidence in the police and the police complaints system, it is vital that allegations of discrimination arising from police complaints, conduct matters, and death and serious injury investigations are handled fairly and appropriately. We reviewed complaint, misconduct and grievance files to assess the extent to which forces identify and respond to discrimination appropriately and at the earliest opportunity (including referrals to the IPCC), and the extent to which these allegations are investigated in accordance with the IPCC guidelines for handling allegations of discrimination.[32]

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[32] See annex A for more information about our case file review. *IPCC guidelines for handling allegations of discrimination*, IPCC, September 2015. Available from:

Identifying and responding to potential discrimination

The Metropolitan Police Service's workforce has a good understanding of what discrimination involves, both as it involves the police's treatment of the public and as it relates to behaviour in the workplace. Those we spoke with were able to describe discrimination and gave examples of instances where it had occurred and the negative effect it had had. These examples mostly involved the force failing to address discrimination, resulting in the workforce losing trust and confidence in their leaders and in the process of reporting discrimination. Many of those we spoke with said that although they would feel confident about reporting workplace concerns unrelated to discrimination, they believe that colleagues are less likely to raise allegations of discrimination because they will not be dealt with properly. In September 2016, the Equalities and Human Rights Commission published its report on its investigation into the unlawful harassment of, discrimination against and victimisation of Metropolitan Police Service staff who made discrimination complaints. Since then, the force has worked to improve its approach to dealing with allegations of discrimination under its grievance procedure and to raise awareness of this matter in the workforce. The workforce considers that the force has taken positive action to improve its process of dealing with discrimination. However, the force recognises that more needs to be done to win the workforce's trust and confidence in its grievance process.

Allegations of discrimination are mainly identified and handled correctly. We examined ten discrimination complaints recorded by the force. We also evaluated 14 other complaints that we considered might contain unidentified allegations of discrimination. We found that one of these other complaint cases contained allegations of discrimination that the force had failed to identify. We then assessed six discrimination internal misconduct cases, and nine that we considered might contain unidentified allegations of discrimination. We did not find any additional cases that the force had failed to identify.

The Police (Complaints and Misconduct) Regulations 2012 require forces to refer a matter to the IPCC if it is more serious and is aggravated because it is alleged that discrimination was a reason for this behaviour. We examined the cases that the force had recorded as alleging discrimination to see whether it had complied with this requirement. We found that five discrimination complaint cases met the IPCC referral criteria, and that all five cases had been referred to the IPCC. We found that five discrimination internal misconduct cases met the IPCC referral criteria, and that four of these cases had been referred to the IPCC.

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www.ipcc.gov.uk/sites/default/files/Documents/statutoryguidance/Guidelines_for_handling_allegations_of_discrimination.pdf

Our inspectors found evidence that the force tended also to refer cases to the IPCC too readily. Taking discrimination matters to a level beyond what is required can result in victims being reluctant to report less serious allegations that should be dealt with more appropriately at a local level. The directorate of professional standards recognises the tendency to refer all cases alleging discrimination to the IPCC and is considering how to respond to this. Getting referrals right will help to convince the workforce that allegations of discrimination will be handled correctly.

Investigating allegations of discrimination

The force has recently set up a discrimination investigation unit within the directorate of professional standards. The unit is not yet fully staffed but those working already in the unit have a good understanding of equality and diversity issues, as do their colleagues who carry out local investigations. While the team has not received specialist training, its members have attended presentations by the Advisory, Conciliation and Arbitration Service (Acas) and the IPCC to help them to carry out thorough, high-quality investigations in line with IPCC guidelines. We therefore consider that the team members have the knowledge, skills and experience they need to apply the IPCC guidelines when dealing with allegations of discrimination. Views have also been sought from the chair of the pan-London independent advisory group, the Police Federation and the staff unions concerning their expectations of the unit. We consider the establishment of the discrimination investigation unit a positive step towards ensuring that serious allegations of discrimination are investigated to a high standard. However, we consider that the force needs to take care to ensure that identifying, understanding, responding to and investigating discrimination is not considered the responsibility of this unit alone.

The case file review showed that allegations of discrimination are handled effectively, with IPCC guidelines being applied routinely in the majority of cases. Of the ten public complaint cases that were recorded as discrimination, all but one had been investigated satisfactorily. The main reason for failure in the one case was evidence gathering. The review also showed that all but one complainant who had made an allegation of discrimination received a good service from the force.

Summary of findings

Good

The Metropolitan Police Service is good at ensuring that its workforce behaves ethically and lawfully. It is co-founder of the tri-force London police challenge forum, which considers and advises on ethical dilemmas. Leaders regularly clarify and reinforce what constitutes acceptable and unacceptable behaviour. The force has an achievable plan to ensure all re-vetting is up to date within the next two years. Members of the public can make complaints in different ways, although written

complaints information is not consistently available in police and other public buildings, and is not targeted at those who are reluctant to complain. The complaints we reviewed were dealt with effectively and consistently, so it is disappointing that we were not told of any formal process for offering additional assistance to complainants who need help when going through the complaints process, and records relating to keeping complainants appropriately updated are poor. The workforce has a good understanding of what discrimination involves, but, although it is generally well identified, we encountered some evidence and some workforce perceptions that the force is not responding to discrimination appropriately in all cases. The force is taking concerted action to address these issues, including a recent review of its grievance procedure and work to increase the workforce's trust and confidence in the process. We found a high standard of investigation into allegations of discrimination, while complainants generally received a high standard of service.

Areas for improvement

- The force should ensure that the complaints process is fully accessible to the public, including those people who may require additional assistance, and those who may have less trust and confidence in the police.

- The force should ensure that it provides complainants with meaningful updates consistently, and records information about the updates in its complaints database.

- The force should ensure that cases of discrimination that do not meet the IPCC referral criteria are not referred to the IPCC and that all such cases are dealt with properly at a local level.

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 types of behaviour.[33] As such, this concept of 'organisational justice', and its potential effect on 'procedural justice' forms an important part of HMICFRS' assessment of police legitimacy and leadership. As no comparative data exist on how fairly officers and staff perceive forces have treated them, we continue to focus our assessment on how well forces identify individual and organisational concerns within their workforces and act on these findings.

In our 2017 inspection, we focused specifically on how well forces identify and act to improve fairness at work, including what action they are taking to make their workforces more representative of the communities they serve. We continued to look at how well forces provide for the wellbeing of their workforces, particularly through preventative and early action, and at the way individual performance is managed and developed.

How well does the force identify and act to improve fairness at work?

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.[34] HMICFRS assessed how well force leaders seek feedback from their workforces and use this, alongside other data and information – including that on grievances[35] – to identify, understand, prioritise and resolve their workforces'

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[33] *Fair cop 2: Organisational justice, behaviour and ethical policing*, College of Policing, 2015. Available from:
http://whatworks.college.police.uk/Research/Documents/150317_Fair_cop%202_FINAL_REPORT.pdf and *Organisational justice: Implications for police and emergency service leadership*, Herrington, C. and Roberts, K. AIPM Research Focus, Issue 2, 2013. Available from: www.aipm.gov.au/wp-content/uploads/2013/08/Org-Justice-Final.pdf

[34] *Ibid.*

[35] Grievances are concerns, problems or complaints that a member of staff raises formally with an employer, so data on numbers and types of grievances can provide forces with useful information about matters of concern to their workforces.

concerns. Part of our assessment involved reviewing a small number of grievance cases to assess if these adhere to Acas guidance and the Code of Practice.[36]

Unfairness, or perceived unfairness, in recruitment processes, opportunities and limited career progression can lead to good officers and staff leaving the service prematurely and fewer women and people from black, Asian and minority ethnic (BAME) communities wanting to join the police in the first place. As such, we re-examined how well forces address disproportional workforce representation in a variety of areas – including recruitment, retention and progression for those people with protected characteristics.[37] We looked at the treatment of BAME officers and staff subject to allegations of misconduct – to improve fairness at work and to make forces more representative of the communities they serve.[38]

Leaders seeking feedback and challenge from the workforce

The Metropolitan Police Service has systems and processes that ensure its leaders are open to feedback from the workforce. The annual employee survey called 'Build a better Met' is followed by what it calls 'Met conversations', where senior leaders speak with their teams to agree the top three actions that will be included in the survey action plan. The force also runs 'pulse surveys' throughout the year to check on the views of the workforce. Other feedback mechanisms include intranet forums. The workforce can also provide feedback on leaders' blogs, articles and briefings published on the force intranet, and senior leaders are subject to 360° feedback and are encouraged to seek views from colleagues at different levels. The feedback mechanisms made available by the force are well used. In 2016, 54 percent of the workforce responded to the staff survey.

Despite the opportunities that the workforce has to influence developments, we found that more officers and staff we spoke with said they do not feel listened to or valued than we found in our 2015 and 2016 legitimacy inspections. This dissatisfaction is confirmed by the 'Build a Better Met' employee survey, in which only 11 per cent of respondents reported a belief that action would be taken in response to the survey findings. When we explored this further, we found that many

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[36] *Code of Practice on Disciplinary and Grievance Procedures.* Acas 2015. Available from www.acas.org.uk/media/pdf/f/m/Acas-Code-of-Practice-1-on-disciplinary-and-grievance-procedures.pdf. Also *Discipline and grievances at work: The Acas guide,* Acas, August 2017. Available from: www.acas.org.uk/media/pdf/9/g/Discipline-and-grievances-Acas-guide.pdf

[37] The Equality Act 2010 defines the following characteristics as protected characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation. Available from: www.legislation.gov.uk/ukpga/2010/15/section/4

[38] We last examined these issues as part of our 2015 PEEL legitimacy inspection. See *Police legitimacy 2015 – a national overview*, HMIC, February 2016. Available from: www.justiceinspectorates.gov.uk/hmicfrs/publications/police-legitimacy-2015/

feel the force's leaders would press ahead with implementing new ways of working whatever valid concerns had been raised about the detrimental effects of the changes on the workforce and the service to the public. Communication and engagement with the workforce about the One Met Model 2020[39] has also lessened since our earlier inspections, and, as a result, many people have become disengaged from the change process. Before it puts change programmes into effect – so that the force's ability to make lasting change is not undermined – the force needs to ensure that the workforce is fully engaged and is confident that, when it gives feedback and submits ideas, these are valued and listened to.

Identifying and resolving workforce concerns

The force analyses a range of data and feedback from the workforce to identify issues that influence workforce perceptions. Sources include grievances, exit interviews, complaints, disciplinary action and employment tribunals. This management information is presented in a dashboard format and is monitored by local and central leaders, so that trends may be identified and positive action taken. The force has made a number of improvements to the way in which it deals with workplace concerns, including the launch of its new grievance policy and procedure, which was produced following consultation with Acas, the Police Federation and staff unions. The revised documents are easily accessible on the force intranet. Following training, 50 officers and staff now provide an internal mediation service that helps to resolve grievances at the earliest opportunity. A grievance telephone helpline was introduced in January 2016 to provide callers with early advice, intervention and local resolution. At the time of the inspection, the helpline had given advice and support to 163 callers.

Data on the numbers and types of concerns, problems or complaints (collectively known as grievances) that have been raised by officers or staff can provide forces with useful information about matters of concern to their workforces.

All forces have grievance procedures but the number of grievances in each force differs widely across England and Wales. We requested data for the ten months from 1 April 2016 to 31 January 2017 on the number of grievances raised by the workforce. Figure 2, below, shows that the Metropolitan Police Service had 6.6 grievances raised per 1,000 workforce. This is broadly in line with the England and Wales average of 4.9 grievances raised per 1,000 workforce.

Figure 3 shows that the number of grievances raised by officers in the Metropolitan Police Service was 5.4 per 1,000 officers, while the England and Wales average was 4.1 grievances per 1,000 officers. In the same period, PCSOs raised 11.1 grievances

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[39] One Met Model 2020 is the 10 change programmes that will transform the way in which the force is organised and how it operates.

per 1,000 PCSOs; the England and Wales average was 4.4 grievances per 1,000 PCSOs. Police staff raised 9.5 grievances per 1,000 staff in the same period; the England and Wales average was 6.2 grievances per 1,000 staff.

Figure 2: Grievances raised per 1,000 workforce in Metropolitan Police Service in the ten months from 1 April 2016 to 31 January 2017
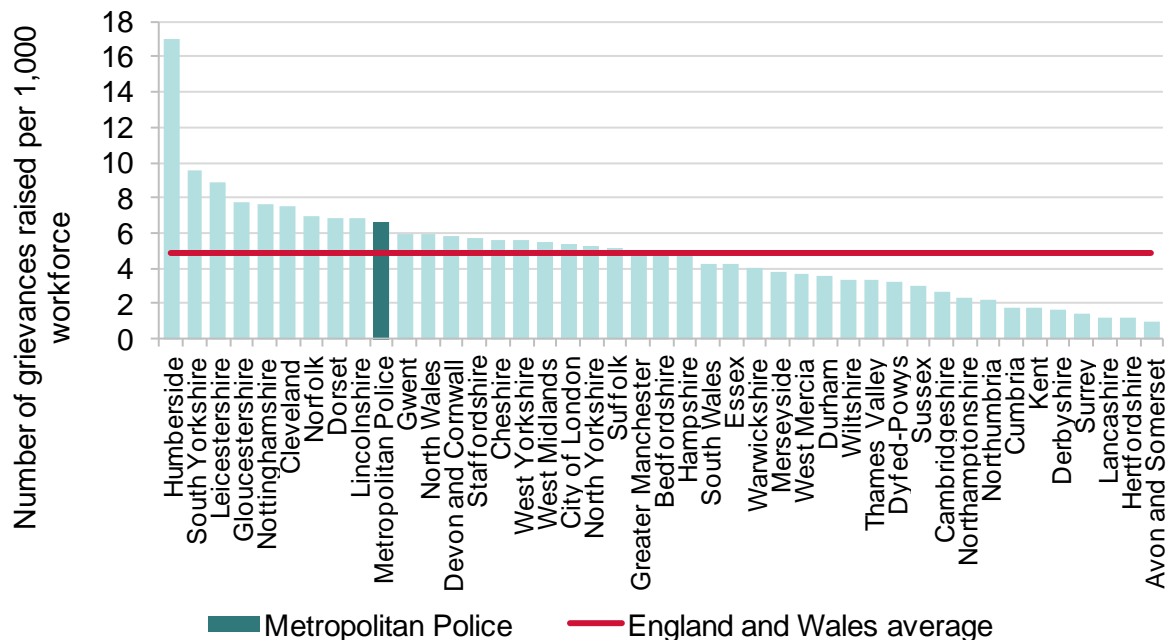
Source: HMICFRS Legitimacy data collection

Figure 3: Grievances raised by officers, PCSOs and staff (per 1,000 officers, PCSOs and staff), in Metropolitan Police Service in the ten months from 1 April 2016 to 31 January 2017
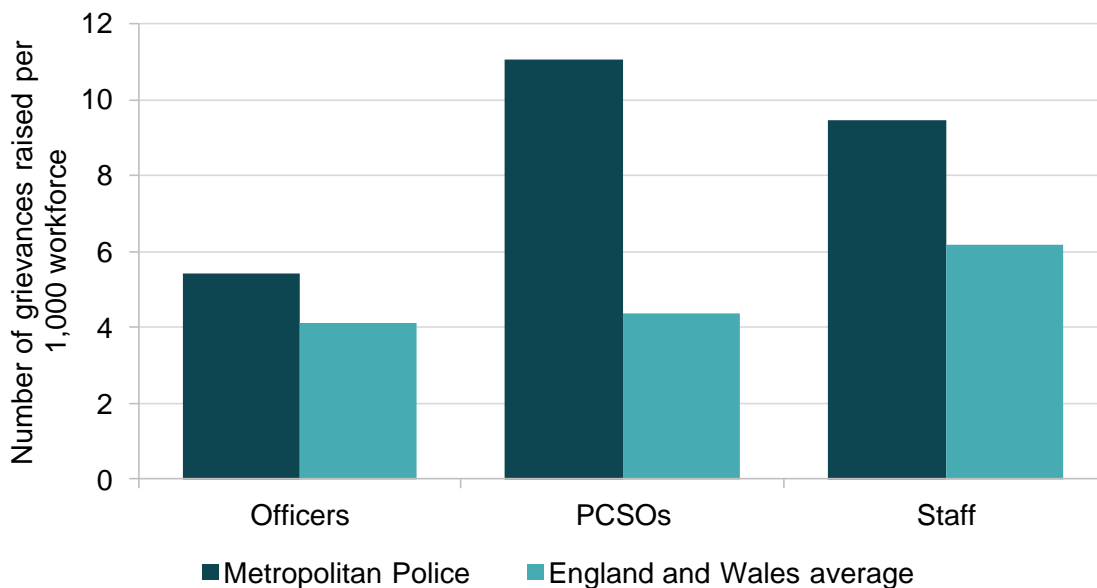
Source: HMICFRS Legitimacy data collection

Creating a more representative workforce

The force has carried out detailed analysis of its recruitment processes to ensure that these do not unfairly favour or exclude any particular group. As a result, it has identified the points at which applicants with protected characteristics[40] fail to go on to the next stage to recruitment as officers, and has made reasonable adjustments. Examples include joint work with the College of Policing to re-design the assessment centre stage of the new recruit process because the failure rates for BAME applicants are disproportionately high. The revised process is due to be piloted in September 2017, so its effect is not yet known.

The force has also recently run a targeted campaign to attract more female applicants as direct-entry detectives. Analysis of the force's retention rates, the make-up of its workforce and exit interviews do not suggest that a disproportionately high number of people with protected characteristics are leaving the organisation, which is also confirmed by leaver rates shown in Figures 5 and 7. Promotion board scores are also analysed to identify any disproportionality. Despite this, officers and staff who had unsuccessfully applied to be included in progression schemes, or who are not eligible for these schemes, were dissatisfied with their career opportunities, pointing out the lack of clear career routes to follow. The force's people strategy 2017–2020 clearly sets out its approach to recruitment and progression throughout its current transformation programme. The force should ensure that the workforce is made aware of the strategy to help manage their expectations.

Our 2015 legitimacy inspection found that the force had analysed complaints data and recognised that BAME officers and staff were more likely than others to be subject to a complaint and more severely disciplined following an investigation. At that time, the reasons for this were not understood. Since then, MOPAC has carried out research to gain a better understanding of the causes and of ways to address them. One cause is that allegations involving BAME officers and staff are more likely to be referred to the directorate of professional standards rather than being resolved locally; this is due to a perception that supervisors will be accused of racism. An action plan has been developed to respond to the research findings; actions include re-designing the misconduct form to ascertain further whether a case meets the criteria for referral to professional standards. It would assist the force if awareness of unconscious bias was reinforced among supervisors, to help them to make decisions confidently about allegations involving BAME officers and staff.

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[40] The Equality Act 2010 defines the following characteristics as protected characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation. Available from: www.legislation.gov.uk/ukpga/2010/15/section/4

To assess how well the force reflects the local population, we considered data on the number of women and people from BAME communities recruited to the force, the number at senior officer level and the number who have served for over 20 years. We used these data to compare the make-up of the force with the make-up of the community it serves.

In the geographical areas served by the Metropolitan Police Service, the 2011 census indicates that BAME people made up 40.2 per cent of the local population. In 2016/17, in the Metropolitan Police Service 13.3 per cent of officers were BAME (see Figure 4). In relation to officers, 25.4 per cent of those joining the force, 5.7 per cent of those in senior ranks and 6.4 per cent of those who had served over 20 years were BAME.

Figure 4: Percentage of officer joiners, officers in post, officers in senior roles and officers serving over 20 years who are black, Asian or minority ethnic (BAME), in Metropolitan Police Service in 2016/17, compared with the percentage of BAME people in the local population
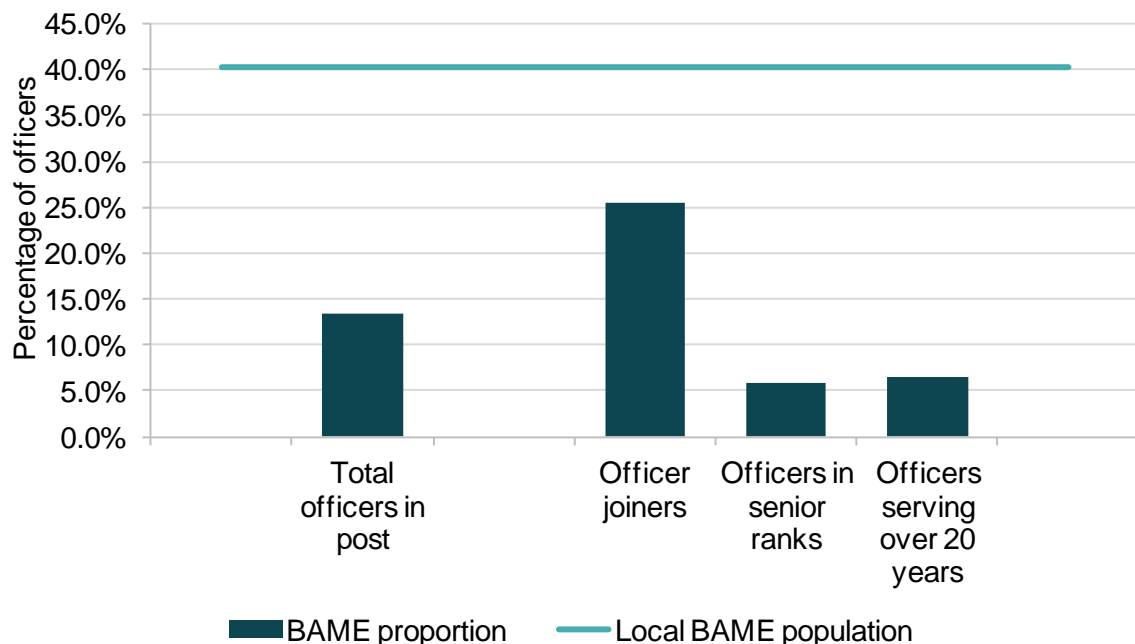
Source: Home Office Annual Data Requirement
Note: High percentages may be due to low overall numbers. The figure above represents officers where an ethnicity was stated.

Figure 5: Comparison of officer leaving rates between white and black, Asian or minority ethnic (BAME) officers (per 1,000 white or BAME officers), in the Metropolitan Police Service from 2007/08 to 2016/17
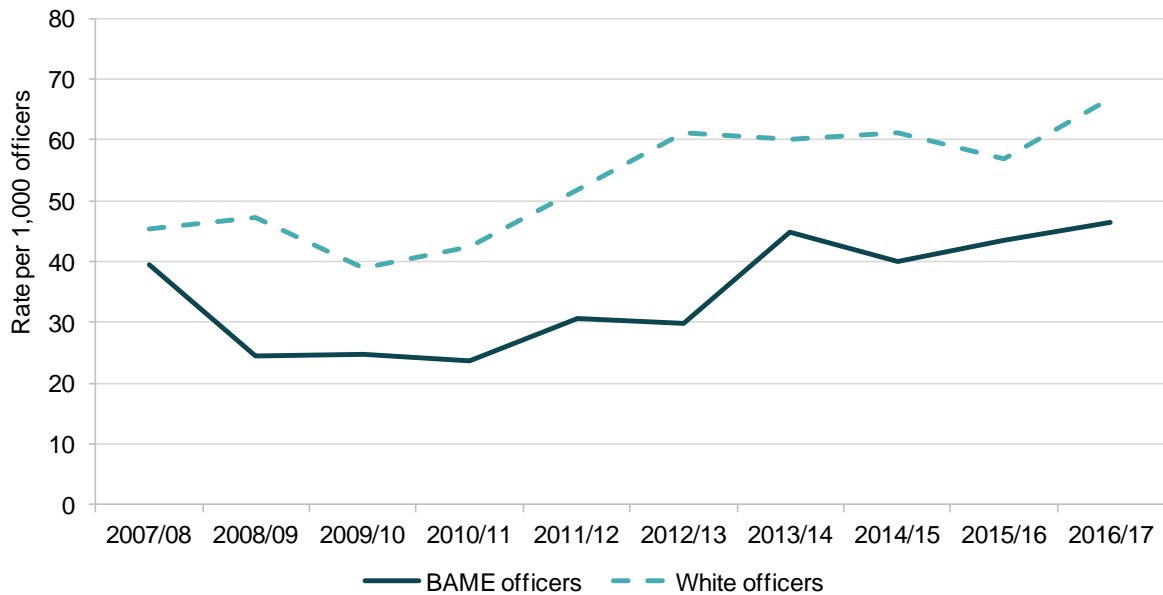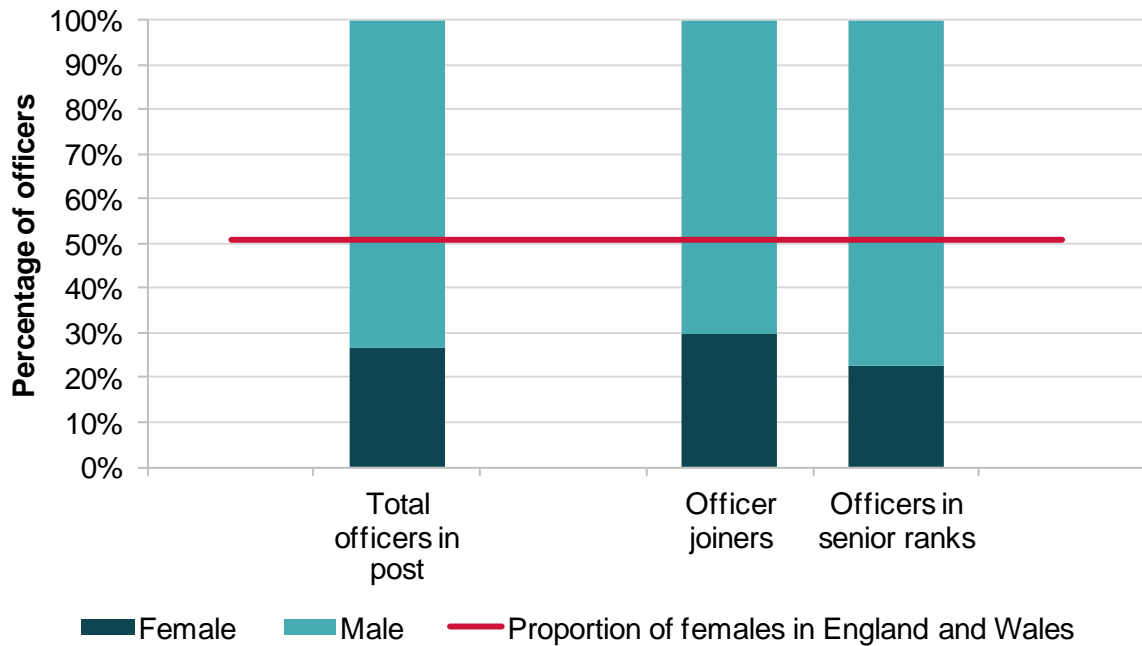
In 2016/17 in the Metropolitan Police Service, 47 of the equivalent of every 1,000 BAME officers left the force (see Figure 5), while 67 of every 1,000 white officers left. Fluctuations in the BAME officer leaver rate may be due to low numbers of BAME officers in the force.
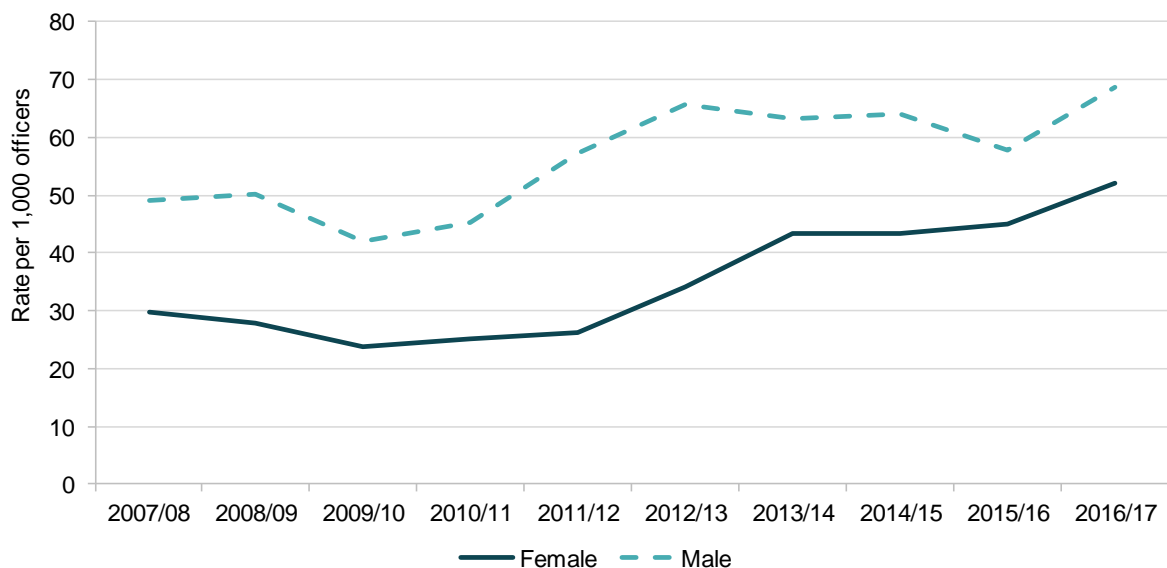
The proportion of female officers, at 27 percent, is lower than the proportion of females in the general population (51 percent). In the 12 months to 31 March 2017, in the Metropolitan Police Service, 30 per cent of those joining the force and 23 per cent of those in senior ranks were female (see Figure 6).

Figure 6: Percentage of officer joiners, officers in post and officers in senior ranks, by gender, in the Metropolitan Police Service in 2016/17, compared with the percentage of women in the England and Wales population

Figure 7: Comparison of officer leaving rates between male and female officers (per 1,000 male or female officers) in the Metropolitan Police Service from 2007/08 to 2016/17

In 2016/17 in the Metropolitan Police Service, 52 female officers per 1,000 officers left the force, compared with 69 male officers per 1,000 officers.

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.[41] HMICFRS assessed how well force leaders understand and promote these benefits by developing a culture that fosters workforce wellbeing, and how well forces use data and information – including feedback from the workforce – to identify and understand their wellbeing. Also, we assessed how well forces use this information to take preventative and early action to support workforce wellbeing at both an individual and organisational level.

Understanding and promoting wellbeing

The Metropolitan Police Service recognises that the nature of policing can pose physical and psychological risks to the health and wellbeing of its workforce and is committed to addressing them. It has made some progress in this respect since our 2016 legitimacy inspection. Wellbeing is an important element of the people strategy. A wellbeing lead was appointed in March 2017 and a steering group was set up the previous month. Furthermore, the health and safety board was extended in March 2017; it is now called the health and safety and wellbeing board. In our 2016 legitimacy report, we said the force should ensure that its supervisors can recognise and provide support on wellbeing issues. There has been some improvement in this area since last year. Leaders we spoke with understand their responsibilities in this field and, in general, feel supported by the force. In addition, the 'Leading for London' programme now includes wellbeing awareness briefings, to help leaders identify the early signs of a problem. We were given many examples of how leaders actively champion wellbeing, such as the introduction of a walking group and the holding of wellbeing days when officers and staff can speak directly to appropriate professionals.

Identifying and understanding workforce wellbeing needs

Analysis of sickness data can give an indication of whether there are problems relating to wellbeing within a police force. It provides a useful point of comparison between forces who can also use sickness data to help them understand the nature and causes of sickness across the organisation to help them prevent sickness and manage it when it occurs.

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[41] *Well-being and engagement in policing: the key to unlocking discretionary effort*, Ian Hesketh, Cary Cooper and Jonathan Ivy, 2016, Policing. pp. 1–12. Available from: https://oscarkilo.org.uk/wellbeing-and-engagement-in-policing-the-key-to-unlocking-discretionary-effort/ Also see https://fitforwork.org/employer/benefits-of-a-healthy-workforce/

We compared force data on the percentage of police officers, PCSOs and police staff on long-term and short/medium-term sickness absence. On 31 March 2017, in the Metropolitan Police Service, 1.9 per cent of officers were on short or medium-term sick leave. The England and Wales average was 1.8 per cent. The latest year for which data is available is 2017; this saw an increase of 0.2 percentage points over the previous year, which is in line with changes in the last ten-year period (see Figure 8).

Figure 8: Percentage of officers on short or medium-term sick leave in the Metropolitan Police Service compared with the England and Wales average, on the 31 March from 2008 to 2017
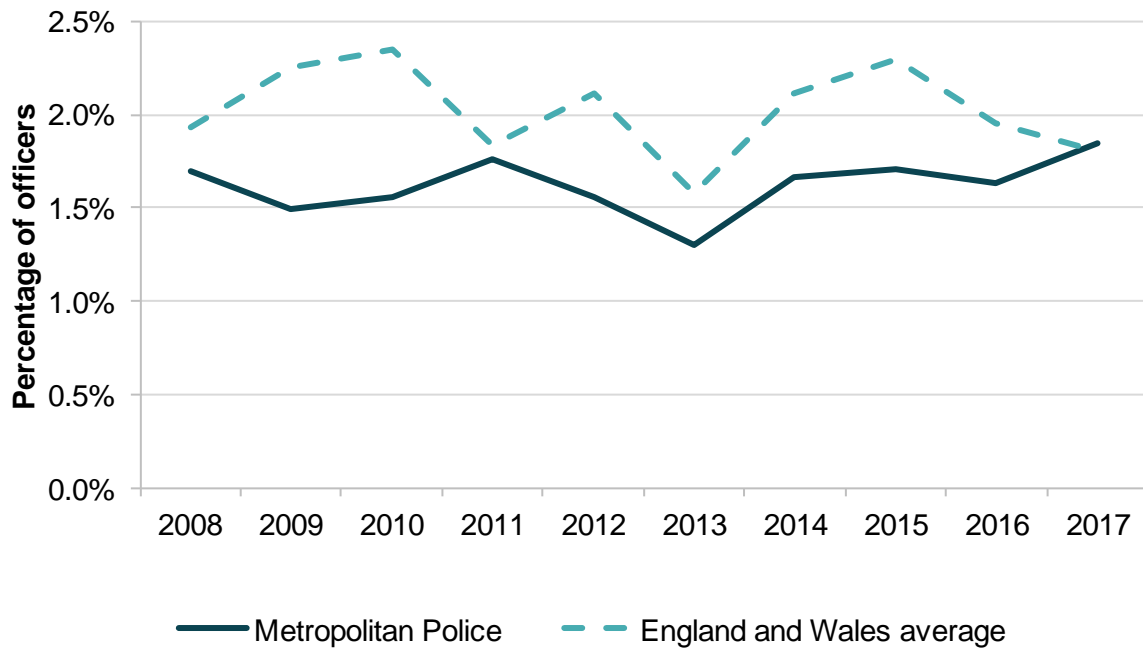
Source: Home Office Annual Data Requirement

On 31 March 2017 the proportion of officers in Metropolitan Police Service on long-term sick leave was 1.7 per cent, while the England and Wales average was 1.9 per cent. The latest year for which data were available is 2017, which saw an increase of 0.3 percentage points over the previous year, which is in line with changes in the last ten-year period.

Figure 9: Percentage of officers on long-term sick leave, in Metropolitan Police Service compared to the England and Wales average, as at 31 March from 2008 to 2017
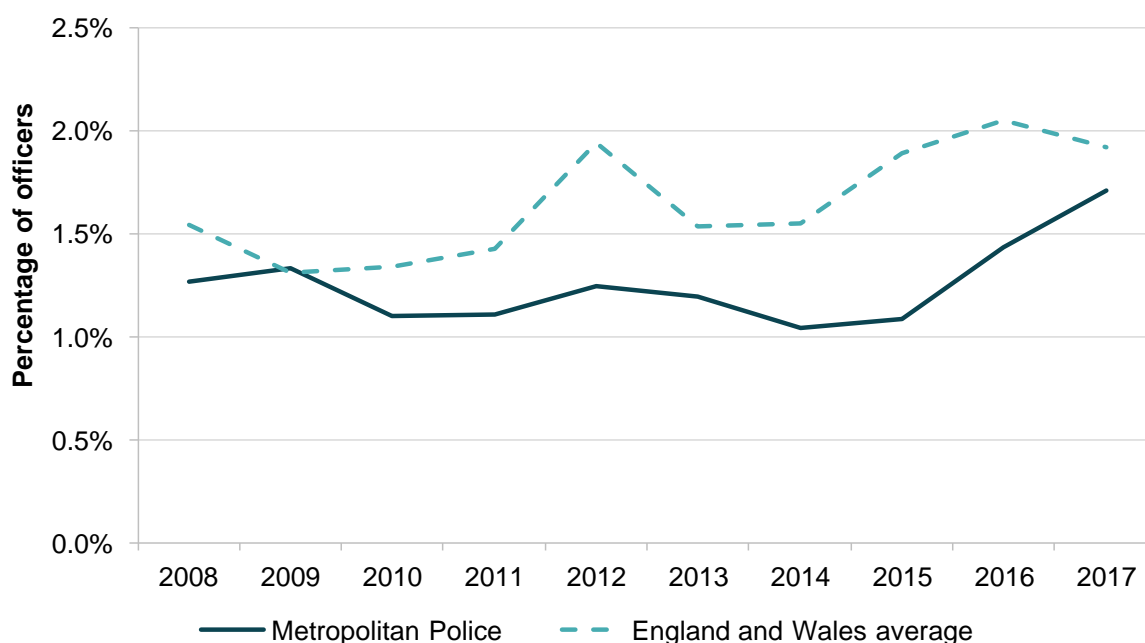
Source: Home Office Annual Data Requirement

The force monitors and analyses a range of information, including annual leave not taken, the re-scheduling of rest days that are cancelled, and overtime and sickness absence, to enable it to understand better the risks and threats to workforce wellbeing, and their underlying causes. The management information this provides is given to leaders for discussion and further action. The force has reduced additional overtime allocation to officers who have already worked a high number of overtime hours. It has also taken immediate action in response to high sickness absence and loss of staff and low staff morale in the Metropolitan communications command, and has a longer-term plan to maintain its wellbeing and morale. Since HMICFRS' 2016 inspection, the force has continued to raise awareness about mental health. For example, the mental health charity MIND visits boroughs to raise supervisors' awareness about recognising their own problems as well as those affecting their staff. Information about mental health support services is also available on the force intranet.

Taking preventative and early action to improve workforce wellbeing

The force has a range of wellbeing provision, and comprehensive information about this is available on its intranet. Recently, the force outsourced the management of its occupational health provision, in consultation with the Police Federation and staff unions, which the workforce sees as positive. The immediate action being taken to improve morale in Metropolitan communications command is also seen as positive. It is widely agreed that the provision of support following a critical incident, such as the Westminster attack, is good. Officers and staff know where to look for information and are confident about discussing such matters with their supervisors. Nonetheless, despite all the steps the force is taking, staff still feel that wellbeing is not a priority.

When we explored this concern, we found that many feel that consideration of the daily pressures of policing and of the detrimental effects of a build-up of pressure are insufficient, and that not enough action is being taken to reduce them.

Being the subject of, or a witness in, a misconduct case, can have a serious effect on people. In all 15 misconduct cases we reviewed, we found that witnesses and those subject to allegations received a satisfactory service from the force, from initial allegation through to final assessment. However, only eight received meaningful updates from the force, and there are concerns in the workforce about the length of time being taken to investigate some cases, and about the effect this has on those affected.

Wellbeing is an important part of the people strategy. A lead and clear governance structure are now in place that will help the force to strengthen its commitment to wellbeing among the workforce; the force should ensure that this happens. The force also needs to consider how best to balance the quality and timeliness of misconduct investigations.

How fairly and effectively does the force manage and develop both the performance of its individual officers and staff and its selection processes?

College of Policing research on organisational justice suggests that the process for promoting people and failure to deal with poor performance may have an adverse affect on workforce perceptions of fairness, and this in turn may lead to negative attitudes and types of behaviour in the workplace.[42] In addition, effective performance management and development mitigate risks to the force and ensure continuous improvement. HMICFRS assessed how fairly and effectively forces manage the performance of individual officers and staff, including the value that forces place on continuing professional development (CPD), in line with guidance from the College of Policing.[43] Also, we looked at how fairly forces identify and select their leaders, and the extent to which these decisions result in leaders who represent a range of styles, approaches and backgrounds.

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[42] *Fair cop 2: Organisational justice, behaviour and ethical policing*, College of Policing, 2015. Available from:
http://whatworks.college.police.uk/Research/Documents/150317_Fair_cop%202_FINAL_REPORT.pdf.

[43] College of Policing guidance on the police performance development review (PDR) process is available from: www.college.police.uk/What-we-do/Support/Reviewing-performance/Pages/PDR.aspx
See also the College of Policing's competency and values framework. Available from:
www.college.police.uk/What-we-do/Development/competency-and-values-framework/Pages/Competency-and-Values-framework.aspx

Managing and developing individual performance

Supervisors in the Metropolitan Police Service are required to complete an annual performance development review for the officers and staff they line manage to assess an individual's performance. It should also be used to enable line managers to support officers and staff in working towards their full potential. As found in our 2015 and 2016 inspections, the current process does not have credibility with the workforce. The problem is that performance is being marked as satisfactory regardless of how an individual is actually performing. In addition, performance conversations do not take place consistently, so that officers, and police staff especially, feel that they are not given the opportunity formally to discuss current performance and future development.

The force recognises the problem, and is piloting the '3 As' performance development review process (for officers from constable to inspector ranks) based on aspirations, achievements and abilities. Officers using the new process said it is an improvement on the old one, particularly as a performance conversation has to take place at least quarterly. However, consistency is an issue, and technical issues mean that full implementation has been delayed until the latter part of 2018. In the meantime, the majority of the workforce still have to use the current, unpopular, process. In addition, some police staff believe that they are no longer required to complete a review and that if they do not do so there is little, if any, opportunity for a formal discussion about their development. The force needs to ensure that its approach to both appraisal processes is clearly understood and that appraisal is used effectively by the workforce. It should also consider how it can improve the current process while awaiting implementation of the new one.

Identifying potential senior leaders

The force has many processes in place to select officers with high potential. It participates in a number of talent schemes, such as the College of Policing's direct entry superintendent and high potential development schemes, and has a leadership development programme for the Special Constabulary. It created the Police Now[44] initiative and played a leading role in its development into a national scheme. The force also runs internal fast-track schemes for officers within the organisation; all schemes are advertised annually so that they are accessible to all officers who may wish to apply.

Police staff can apply for some officer schemes, but, as in 2016, this group raised concerns that opportunities for progression and development are mostly aimed at officers. This is understandable because resources are limited, but the force needs to ensure that police staff feel valued. Clarifying the arrangements for police staff performance development reviews and ensuring that these reviews take place is a

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[44] Police Now is a two-year programme that offers graduates the opportunity to become a police officer in challenging and often deprived communities.

good starting point. The potential of officers at chief inspector rank and above, including those of National Police Chief Council's rank, is assessed using the force's performance and potential matrix. The matrix aims to help the force to gain a more consistent view of the capability and future potential available throughout the organisation. At the time of the inspection, there was no similar process for police staff equivalents. The force tells us that the performance and potential matrix is being put into operation in phases to include police staff. So far, it has been extended to police staff equivalents in the force's human resources function.

Selecting leaders

Over the last 12 months, the force has carried out a thorough review of its promotion process to include more varied ways of selecting suitable officers for promotion. This includes situational judgment testing, where candidates are presented with a situation that they could face in their new role, and are required to select the most and least appropriate response from a list of actions The force recently launched its career development service, which is an online tool for BAME and female officers, depending on rank, that brings together information on development opportunities throughout the force. An internal assessment director has been appointed whose responsibilities include candidate briefings and ensuring fair decision making. From July 2017, line management sponsorship is no longer necessary if an officer wants to apply for promotion, although line managers will be asked to verify candidate information at the end of the process.

Another aim of the review was to make the promotion process more open and accessible and improve the workforce's confidence in it. The changes have been well received, although many officers still do not feel that they have fair and equal access to promotion and development opportunities. The force recognises that it will take time to change the workforce's perceptions in this respect; reinforcement of its approach to recruitment and promotion may help it to start managing workforce expectations. The force recognises that it is important for its workforce to reflect the communities it serves at all ranks and grades. Through its participation in different talent schemes, it seeks to ensure its leaders include people with skills and experience outside the policing or public sectors, who bring a different perspective to discussions and improve collective decision making.

Summary of findings

Requires improvement

The Metropolitan Police Service requires improvement in some elements of treating its workforce with fairness and respect. Since our 2016 legitimacy inspection, the force has made progress in many areas. It continues to offer many ways in which the workforce can provide feedback to leaders. It has reviewed its grievance process, and has carried out work to identify any disproportionality in recruitment, retention, progression and in allegations of wrongdoing; it is taking action to address this. There are many processes in place to identify and select officers with high potential. The force continues to make good wellbeing provision and is piloting a new appraisal process. In general, these changes have been received well. However, low trust and confidence in leaders is a recurring theme among the workforce, and morale appears to be the lowest it has been in three years of inspection. Most members of the workforce still use the unpopular performance development review process, and wellbeing is still not perceived as a priority. Technical issues mean that the new appraisal process is unlikely to be put into operation until late in 2018, so improvements will not be introduced quickly.

Areas for improvement

- The force should improve the way that it communicates with the workforce to increase trust and confidence in its leaders, and should provide feedback when it has listened and responded to staff concerns.

- The force should ensure that awareness of unconscious bias is reinforced among supervisors and that they have regular access to guidance to help them to make decisions with confidence about allegations involving BAME officers and staff.

- The force should ensure that it understands and monitors the impact of the build-up of the daily pressures of policing on the workforce and takes an effective, early-action approach towards reducing this pressure.

- The force should ensure that the workforce clearly understands its approach to the current and pilot appraisal processes. It should also consider how best to improve the current process until such time as the new one comes into effect.

Next steps

HMICFRS will assess progress on any recommendations and areas for improvement identified within its reports in a number of ways. We either re-visit those forces where we have identified a serious cause of concern, go back to assess them as part of our annual PEEL inspection programme or receive updates on their progress through regular conversations with forces.

HMICFRS highlights recurring themes emerging from our PEEL inspections of police forces within our national reports on police effectiveness, efficiency, legitimacy and leadership. These reports identify problems 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 need to be made at a national level.

Annex A – About the data

Data used in this report

The source of the data is presented with each figure in the report, and is set out in more detail in this annex. The source of Force in numbers data is also set out below.

Methodology

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

Comparisons with England and Wales averages

For some datasets, the report states whether the force's value is 'lower', 'higher' or 'broadly in line with' the England and Wales average. This is calculated by using the difference from the mean average, as a proportion, 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.

The England and Wales averages will differ slightly from the Value for Money Profiles because we have included City of London Police and the Metropolitan Police Service within the average in this publication.

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.

Population

For all uses of population as a denominator, unless otherwise noted, we use the Office for National Statistics (ONS) mid-2015 population estimates.

Note on workforce figures

All workforce figures are from the Home Office Annual Data Return (ADR) published in the Home Office's published police workforce England and Wales statistics (available from www.gov.uk/government/collections/police-workforce-england-and-wales), or the Home Office police workforce open data tables (available from www.gov.uk/government/statistics/police-workforce-open-data-tables).

This year we have tried to align our workforce categories with those in the Home Office workforce Statistics publication.

This means data presented on the gender and ethnic diversity of the workforce we have not included Section 38-designated officers within the 'Police Staff' category so that these figure will read across to the workforce publication more easily. However we have included Section 38-designated officers within descriptions of the total workforce to be consistent with HMICFRS Efficiency reports.

Please note that all workforce figures are in full-time equivalent (FTE) unless otherwise stated and exclude traffic wardens and special constables.

Force in numbers

Workforce (FTE) for 2016/17

Data may have been updated since the publication. Workforce includes Section 38-designated investigation, detention or escort officers, but does not include Section 39-designated detention or escort staff[45]. The data are the actual full-time equivalent (FTE) and data for 2016/17 are as at 31 March 2017.

For FTE, these data include officers on career breaks and other types of long-term absence, and excludes those seconded to other forces.

Ethnic diversity and gender diversity

Data may have been updated since the publication. As noted above to align categories with Home Office publication the Police Staff category does not include Section 38-designated officers. Staff ethnicity data are derived from headcount rather than FTE.

Grievances

Data are derived from the HMICFRS data collection conducted prior to inspection. The data refer to those grievances that were raised and subject to a formal process (not including issues informally resolved with a line manager).

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[45] See sections 38 and 39 of the Police Reform Act 2002. Available at: www.legislation.gov.uk/ukpga/2002/30/section/38

Stop and search

Data are derived from the Home Office Police Powers and Procedures England and Wales year ending 31 March 2016 publication (available at www.gov.uk/government/statistics/police-powers-and-procedures-england-and-wales-year-ending-31-march-2016). Stop and search totals used exclude vehicle only searches and those searches where the ethnicity of the subject was 'not stated'. The population data used is usual residents by ethnicity from the 2011 census.

Figures throughout the report

Figure 1: Likelihood of black, Asian and minority ethnic (BAME) people being stopped and searched (under section 1, PACE) compared with white people, in the local population of Metropolitan Police Service in the 12 months to 31 March 2016

Data are derived from the Home Office Police Powers and Procedures England and Wales year ending 31 March 2016 (available at www.gov.uk/government/statistics/police-powers-and-procedures-england-and-wales-year-ending-31-march-2016). Stop search totals used exclude vehicle only searches and those searches where the ethnicity of the subject was 'not stated'. Data may have been updated since publication. The likelihood of a stop and search is based on the number of stop searches per 1,000 population for each ethnic group. The population data used is usual residents by ethnicity from the 2011 census. These are the most robust and up-to-date population breakdowns by ethnicity.

Figure 2: Grievances raised per 1,000 workforce, in Metropolitan Police Service in the ten months from 1 April 2016 to 31 January 2017

Figure 3: Grievances raised by officers, PCSOs and staff (per 1,000 officers, PCSOs and staff), in Metropolitan Police Service in the ten months from 1 April 2016 to 31 January 2017

Data are derived from the HMICFRS data collection conducted prior to inspection. The data refer to those grievances that were raised and subject to a formal process (not including issues informally resolved with a line manager). Differences between forces in the number of raised grievances may be due to different handling and recording policies.

Figure 4: Percentage of officer joiners, officers in post, officers in senior roles and officers serving over 20 years who are black, Asian or minority ethnic (BAME), in Metropolitan Police Service in 2016/17, compared with the percentage of BAME people in the local population

These data are derived from ADR 511, 512 and 521. Data may have been updated since the publication. Officer ethnicity totals are based on numbers of people (referred to in the Home Office data as headcount) rather than FTE.

Figure 5: Comparison of officer leaving rates between white and black, Asian or minority ethnic (BAME) officers (per 1,000 white or BAME officers), in Metropolitan Police Service from 2007/08 to 2016/17

These data are derived from ADR 511 and 531. Data may have been updated since the publication. Officer ethnicity totals are headcount rather than FTE.

Figure 6: Percentage of officer joiners, officers in post and officers in senior ranks, by gender, in Metropolitan Police Service in 2016/17 compared with the percentage of women in the England and Wales population

These data are derived from ADR 502 and 521. Data may have been updated since the publication.

Figure 7: Comparison of officer leaving rates between male and female officers (per 1,000 male or female officers), in Metropolitan Police Service from 2007/08 to 2016/17

These data are derived from ADR 502 and 531. Data may have been updated since the publication.

Figure 8: Percentage of officers on short or medium-term sick leave, in Metropolitan Police Service compared with the England and Wales average, on 31 March from 2008 to 2017

Data used in the above data were obtained from Home Office annual data returns 501 and 552 and published in the Home Office police workforce open data tables (available from www.gov.uk/government/statistics/police-workforce-open-data-tables).

Figure 9: Percentage of officers on long-term sick leave, in Metropolitan Police Service compared with the England and Wales average, as at 31 March from 2008 to 2017

Data used in the above data were obtained from Home Office annual data returns 501 and 552. Available from: www.gov.uk/government/statistics/police-workforce-open-data-tables. Long-term sick leave is defined as an absence due to sickness that has lasted for more than 28 days as at 31 March 2017. Data may have been updated since the publication.

Stop and search record review methodology

HMICFRS was commissioned by the Home Office to conduct a further assessment of reasonable grounds, building on the assessments we carried out in 2013 and 2015 so that we could demonstrate any changes over time. We used a similar methodology to do this: forces provided details of stop and search records by

working back in time from 7 January 2017 until a total of 200 was reached.[46] This amounted to a total of 8,574 records – some records provided were not actually records of stop and search encounters, and these were excluded. As part of our assessment, we gave forces the opportunity to review our findings and make representations.

As in 2013 and 2015, HMICFRS reviewed each record to assess the reasonableness of the recorded grounds. However, this year we also identified how many of the records reviewed were carried out to search for drugs and whether stop and search was carried out for drugs, whether the suspicion involved possession only or the more serious supply-type offence. Currently forces are not required to differentiate between the two. We did this so that we could ascertain how many in our sample were for possession of drugs, rather than supply, as high rates of possession-only searches are unlikely to fit with force priorities.

This year, for the first time, we assessed whether or not the use of stop and search powers prevented an unnecessary arrest. We did this to ascertain how many of the records reviewed involved allaying the officer's suspicion in circumstances where the person would otherwise have been arrested, thereby representing a positive use of the powers. Allaying suspicion and preventing an unnecessary arrest is as valuable as confirming suspicion by finding the item searched for.

Professional standards case file review methodology

During February and March 2017, inspection teams from HMICFRS visited the individual or professional standards departments working collaboratively of each force to conduct a case file review. We asked forces to provide us with the last case files they had finalised up to 31 December 2016; but going back no further than two years. We asked to see:

- 10 complaints the force had recorded as containing an allegation of discrimination

- 15 complaints the force had recorded in categories we felt may contain unidentified allegations of discrimination

- 10 service recovery complaints (if the force operated a separate service recovery scheme)

- 10 internal misconduct allegations the force had recorded as containing an allegation of discrimination

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[46] City of London Police was unable to provide records up to 7 January 2017 but instead provided 200 records from 4 October 2016 to 26 November 2016.

- 10 other internal misconduct allegations (so that we could ascertain if they contained unidentified allegations of discrimination)

- 10 grievances (and 10 workplace concerns if the force recorded these separately)

We assessed these case files against the relevant legislation, guidance and code of practice[47] to answer the following questions:

- Access to the system – Has the force identified those cases where the complainant requires additional support to make their complaint, and has that support been provided?

- Initial information – When the complaint was recorded, did the force provide the complainant with a copy of the complaint record, an explanation of the possible ways the complaint may be dealt with, and advised who will be dealing (including contact details)?

- Keeping complainants updated – Has the force provided complainants, witnesses, and those who are the subject of the complaints with regular, meaningful updates?

- Final outcome – Did the force provide the complainant with the findings of the report, its own determinations and the complainant's right of appeal?

- Handling discrimination – Has the force failed to identify any allegations of discrimination? Have any discrimination cases that meet the IPCC mandatory referral criteria been so referred? Has the force investigated the complaints alleging discrimination satisfactorily? Overall, has the complainant making an allegation of discrimination received a good service from the force?

- Grievances/workplace concerns – Has the force identified, investigated and resolved the grievance satisfactorily? Has the force put arrangements in place to support the employees or witnesses throughout the process? Did the witness and those who are subject to the allegations receive a satisfactory service from the force?

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[47] Relevant police complaints and misconduct legislation, IPCC statutory guidance, IPCC guidelines for handling allegations of discrimination, Acas code of practice on disciplinary and grievance procedures and Acas discipline and grievance guide.