

Joint Audit and Standards Committee
25 June 2022

Standards Update

1. Update from Fairness, Policy and Standards Meeting

- 1.1 The last Fairness, Policy and Standards meeting was held on 12/05/22. The meeting is chaired by the Deputy Chief Constable (DCC).
- 1.2 The meeting covered a range of topics including:
- Fairness at work (FAW);
 - Promotions processes;
 - MyMax (the force's new approach to PDRs); and
 - Professional standards performance report.
- 1.3 The force has made considerable progress on the FAW review over the last 2 years. Management information in relation to FAW is now a standing agenda item to ensure continued oversight of this business area.
- 1.4 Analysis has identified disproportionality in FAW submissions, with 70% of submissions over the last 5 years being made by female officers and staff. Qualitative analysis of these cases has been commissioned for the next meeting.
- 1.5 Following feedback from stakeholders, the timescales set out in the FAW policy are due to be reviewed to ensure they are fit for purpose.
- 1.6 Whilst some progress has been made in respect of the promotion process review; it has not had the same momentum and grip as FAW. The force have appointed a new Interim Senior People & Organisational Development (OD) Manager who will lead on this work.
- 1.7 The force have launched a new approach to PDRs – MyMax. MyMax seeks to simplify and make it easier to record and monitor conversations between the individual and their line manager, built around achieving objectives and evidencing individual contributions to the organisations vision, values and plan on a page.
- 1.8 The new PDR process will help the force improve how it manages individual performance and identifies talent. This was an Area for Improvement (AFI) identified by HMICFRS in the 21/22 PEEL Inspection.

2. Update from Quarterly PSD Performance Meeting

- 2.1 The PCC has a quarterly performance meeting with the DCC, Head of PSD and the Senior Complaints and Misconduct Manager.

- 2.2 The last meeting took place on 25/04/2022. An overview of complaints performance and live misconduct matters in Q4 (Jan- Mar 2022) was provided.
- 2.3 There was a 7% reduction in complaints recorded in 2021/22 compared to 2020/21.
- 2.4 It is PSD's ambition to retain as many complaints within the department as possible, to reduce demand on local policing areas and to improve the timeliness, standards and consistency of complaint resolution for the public.
- 2.5 Integral to this is the utilisation of the triage team to resolve complaints informally outside of Schedule 3 of the Police Reform Act, (however it should be noted that a proportion of complaints will always be recorded under Schedule 3 due to the severity of allegations or the wishes of the complainant).
- 2.6 In line with these ambitions, PSD have set an internal aspiration to resolve 75% of complaints through the triage team. PSD exceeded this target each month in Q3-Q4. This has led to a considerable reduction in demand on Local Policing teams, as well as improved timeliness of response for members of the public.
- 2.7 Due to staff changes and vacancies, there has been a small reduction in timeliness of front end recording of complaints. This is compounded by the retention of 90% of complaints within the complaint team (as set out above).
- 2.8 This matter was raised by the PCC following correspondence from members of the public who had experienced delays in contact from PSD. Assurance was provided that performance is continually monitored, appointments have been made to vacant posts and further steps taken to mitigate the impact on the public (e.g. through the use of overtime).
- 2.9 There was a 52% increase in conduct matters in 2021/22 compared to 2020/22, (a trend seen regionally and nationally). An update on conduct cases in terms of both volumes and context is provided to the PCC each quarter.
- 2.10 The increased levels of recorded misconduct and the number of current suspensions (20) shows that the department is taking a proactive approach and position to investigating reports of misconduct. The department is also seeing an increase in officers and staff feeling comfortable to report concerns and worrying behaviours about their fellow colleagues, enabling the team to carry out further investigation.
- 2.11 The key themes for conduct cases recorded in 2021/22 are:
- Inappropriate sexual / suggestable behaviour;
 - Domestic abuse;

- Abuse of position for sexual purpose;
- Dishonesty;
- Use of force; and
- Harassment.

2.12 The data pack provided to the PCC has been amended to include a greater focus on sexual misconduct; reflecting the trends above.

2.13 The increase in conduct cases have been escalated to a series of formal holding to account (HTA) meetings with the Chief Constable (Jun-21, Mar-22).

2.14 At the HTA meeting in March, the PCC asked the force to set out their response to the increase in conduct cases with a focus on prevention. The CC highlighted the importance of understanding the national context when considering the police response to conduct matters.

2.15 The DCC was confident that the force was in the right place in terms of the volume of conduct cases and suspensions. Force activity underway includes delivery of the 'Not in my force, not in my profession' communications campaign; a prevention focused PSD action plan; and the force's wider Violence against Women and Girls (VAWG) strategy.

2.16 The PCC's 2022/23 budget prioritises additional resource into force vetting and professional standards, to provide reassurance to all parties that the right checks are being carried out on all police officers and staff, and to root out any individuals not suitable for the profession.

3. 12 month timeliness letters

3.1 PSD must provide the PCC and the Independent Office for Police Conduct (IOPC) with a notification letter for any local investigation (complaint, conduct or death or serious injury matter) which has not been completed within 12 months. 6 month updates are then required thereafter until the matter has been completed.

3.2 In this context, 'completed' is defined as a final report being submitted to the Appropriate Authority (i.e. does not include the reviews period). Letters must still be submitted even where cases are subjudice.

3.3 Since February 2020, PSD have submitted letters for 10 cases. A small no. of these cases have required subsequent letters at 18 and 24 months. The PCC's office have developed a mechanism to monitor the submission of these letters and to provide oversight of trends.

3.4 In 7 of the cases the delays have been the result of investigations being subjudice and awaiting the outcome of court proceedings.

- 3.5 In 3 cases, the delays are due to complaint matters being allocated to officers in the Local Policing Area. The PCC has raised these cases with PSD as part of the quarterly performance meeting and will be asking for regular updates to ensure these matters get resolved as quickly as possible.

4. PCC Review Function

- 4.1 As of February 2020, the PCC has become the relevant review body (RRB) for low level complaints.
- 4.2 A log has been created to monitor the progress, outcomes and learning for all complaint reviews. This data is also recorded on Centurion (the ICT system used by PSDs nationally), to ensure compliance with national data standards.
- 4.3 101 reviews were completed in 2021/22. 13% (13) of reviews were upheld with recommendations made to the force. National comparator data for the financial year is not currently available, however based on previous data (2020/21), this upheld rate is likely comparable to the national average.
- 4.4 Key themes identified through the recommendations include: the need to provide complainants with more clarity on explanations provided; the need to ensure all elements of the complaint are addressed in the outcome letter, and consideration to be provided to new evidence presented by complainants.