



Promoting improvements
in policing to make
everyone safer

PEEL: Police legitimacy 2016

An inspection of North Wales Police



December 2016

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Introduction

As part of our annual inspections of police effectiveness, efficiency, legitimacy and leadership (PEEL), Her Majesty's Inspectorate of Constabulary (HMIC) assesses the legitimacy of police forces across England and Wales.

Police legitimacy – a concept that is well established in the UK as 'policing by consent' – is crucial in a democratic society. The police have powers to act in ways that would be considered illegal by any other member of the public (for example, by using force or depriving people of their liberty). It is therefore vital that they use these powers fairly, and that they treat people with respect in the course of their duties.

Police legitimacy is also required for the police to be effective and efficient: as well as motivating the public to co-operate with the police and respect the law, it encourages them to become more socially responsible. The more the public supports the police by providing information or becoming more involved in policing activities (such as via Neighbourhood Watch or other voluntary activity), the greater the reduction in demand on police forces.

To achieve this support – or 'consent' – the public needs to believe that the police will treat them with respect and make fair decisions (while taking the time to explain those decisions), as well as being friendly and approachable.¹ This is often referred to as 'procedural justice'. Police actions that are perceived to be unfair or disrespectful can have extremely negative results for police legitimacy in the eyes of the public.

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

¹ *It's a fair cop? Police legitimacy, public cooperation, and crime reduction*, National Policing Improvement Agency, September 2011. Available at:
http://whatworks.college.police.uk/Research/Documents/Fair_cop_Full_Report.pdf

² *Fair cop 2: Organisational justice, behaviour and ethical policing*, College of Policing, 2015. Available at:
http://whatworks.college.police.uk/Research/Documents/150317_Fair_cop%20FINAL_REPORT.pdf

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

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

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

Force in numbers

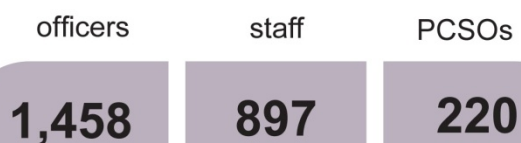


Workforce

Total workforce as of 31 March 2016

2,574

Total workforce breakdown as of 31 March 2016

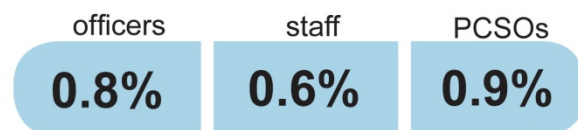


Ethnic diversity

Percentage of BAME in workforce 31 March 2016

overall workforce

0.8%



Percentage of BAME in local population, 2011 Census

2.5%



Gender diversity

Percentage of females in overall workforce 31 March 2016

44%

England and Wales population, 2011 Census

51%

Percentage of females by role 31 March 2016

32%

North Wales Police

62%

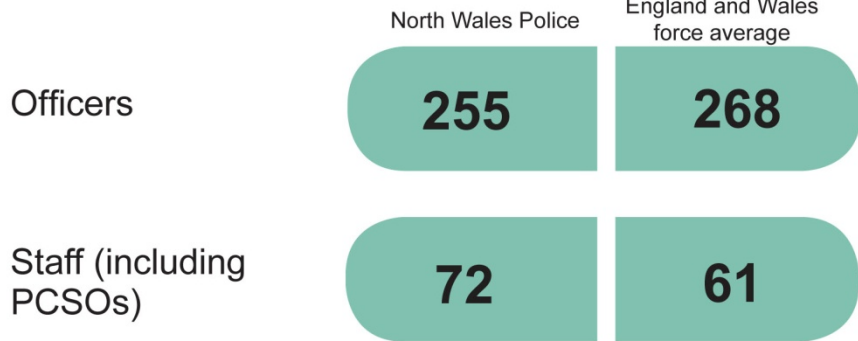
PCSOs

50%



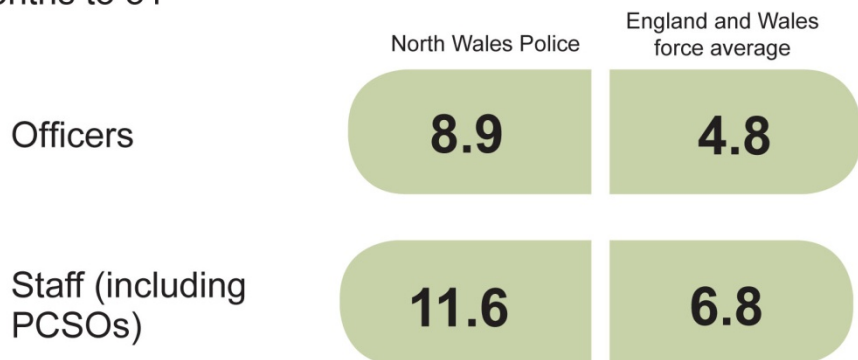
Public complaints

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



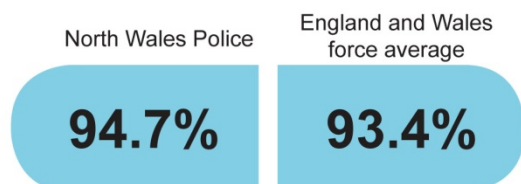
Grievances

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



Victim satisfaction

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



For further information about the data in this graphic please see annex A

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

Overall judgment³



Requires improvement

North Wales Police has been assessed as requires improvement in respect of the legitimacy with which it keeps people safe and reduces crime. Our findings this year are not consistent with last year's findings, in which we judged the force to be good in respect of legitimacy. The force works hard to ensure that the behaviour of its officers is aligned with the Code of Ethics, is good at treating the people that it serves with fairness and respect and seeks feedback and challenge from its local communities. It has limited capacity to seek out and deal with potential corruption, however, and while it recognises the value of wellbeing, we found concerns among the workforce.

Overall summary

North Wales Police understands the importance of treating people with fairness and respect and the workforce understands the relationship between the force's vision and values and the Code of Ethics.⁴ The force seeks feedback and challenge from the people it serves using social media and other methods, and has taken some action to communicate with those who have less trust and confidence in the police. North Wales Police vets applicants in accordance with national guidelines and has a comprehensive programme of action to highlight what is considered to be acceptable and unacceptable behaviour.

The force has some understanding of strategic risks to the integrity of the organisation but has limited capacity to seek out and develop intelligence and conduct proactive enquiries to deal with potential corruption. It is taking action to prevent abuse of authority for sexual gain and informs the public and its workforce about misconduct outcomes. The force uses a several methods to seek the views of its workforce, and is aware of the importance and value of promoting wellbeing. However, not all staff feel equipped to recognise the signs of ill health and the force's

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

⁴ *Code of Ethics – A Code of Practice for the Principles and Standards of Professional Behaviour for the Policing Profession of England and Wales*, College of Policing, London, July 2014. Available at: www.college.police.uk/What-we-do/Ethics/Documents/Code_of_Ethics.pdf

counselling service has been withdrawn. The force's annual performance assessment is not yet perceived to be fair and effective.

Recommendations

North Wales Police is a force that requires improvement. HMIC has not identified any causes of concern and has therefore made no specific recommendations.

Areas for improvement

- The force should review the capacity of its anti-corruption unit to ensure the unit is capable of seeking out misconduct and corruption, and developing intelligence once it is received.
- Annually, the force should produce a local counter-corruption strategic assessment and control strategy, to identify risks to its integrity.
- The force should ensure that its supervisors can recognise and provide support in relation to wellbeing issues.
- The force should improve workforce access to occupational health provision.
- The force should improve how it manages individual performance of officers and staff.

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

College of Policing research suggests that, in the eyes of the public, police legitimacy stems primarily from the concept of ‘procedural justice’: the expectation that officers will treat the public respectfully and make fair decisions (explaining them openly and clearly), while being consistently friendly and approachable.⁵

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

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

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

It is important for the police to understand that it is procedural justice – making fair decisions and treating people with respect – that brings about police legitimacy in the eyes of the public, over and above police effectiveness at preventing and detecting crime.⁶ HMIC assessed the extent to which the importance of procedural justice was reflected in the force’s vision and values, and the extent to which it was understood by the workforce.

Organisational values

North Wales Police understands the importance of treating people with fairness and respect. Staff and officers HMIC spoke to during the inspection said that fairness and respect were core functions of their work, and that the requirement to treat all people in accordance with these values was well understood throughout the workforce. The force regularly reinforces the importance of treating people with fairness and respect

⁵ *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

⁶ *Ibid.*

through regular messages, such as chief constable road shows, the 'It Matters' campaign, the cultural survey, weekly email bulletins, posters, and promotes this further in its leadership training.

This work is reinforced by the force's efforts to raise awareness of the Code of Ethics regularly. The workforce understand the relationship between the force's vision and values and the Code of Ethics, and the importance of acting ethically. This understanding extends to volunteers and the Special Constabulary. This reaffirms HMIC's 2015 legitimacy inspection findings that the chief constable of North Wales Police, with the support of his chief officer team, had sent clear messages to staff about the standards of ethics and behaviour that were expected of them. As a consequence, the people of North Wales can expect to be treated with fairness and respect when they come into contact with North Wales Police.

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

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

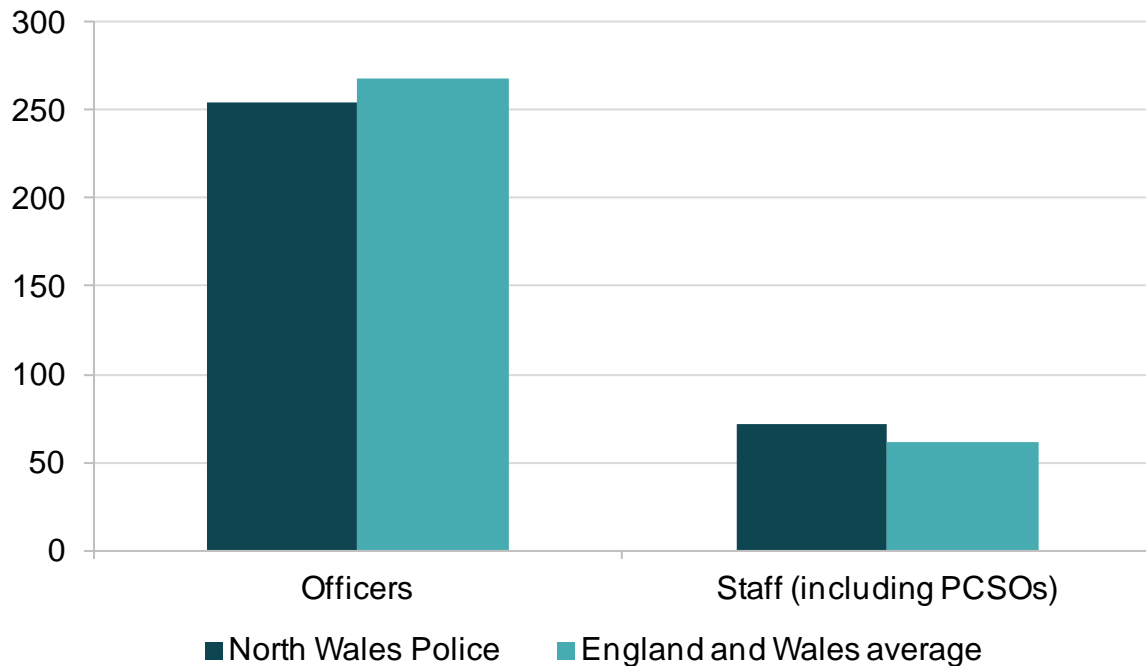
Each force in England and Wales is required to record the nature of complaint cases and allegations and be able to produce complaints data annually. The numbers and types of complaints are valuable sources of information for forces and can be used to help them identify areas of dissatisfaction with their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

Seeking feedback and challenge

North Wales Police frequently seeks feedback and challenge from the people it serves using social media and a variety of data collection tools, such as the Crime Survey of England and Wales and public satisfaction surveys. The force makes contact with communities through forums designed to encourage local participation and help improve the service it provides. While the force focuses chiefly on general efficiency, demand reduction and improved engagement, it does identify and understand some of the issues that have the greatest impact on people's perceptions of fair and respectful treatment. This could be enhanced by gathering relevant information from the various sources and analysing it to identify which issues have the greatest impact on members of the public's perceptions of how they are treated by the police. The force does encourage members of the public to challenge decisions made by officers and staff through the North Wales Police website, Twitter, Facebook, Instagram and YouTube. It also provides a live chat

option on its website. Safer neighbourhood teams regularly attend community meetings to hear about local concerns and these meetings result in the development of local action plans designed to improve public confidence in the police. North Wales Police records cases of dissatisfaction raised by the public. Sergeants are required to contact complainants to understand the issues involved and, where appropriate, initiate an investigation.

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



Source: HMIC Legitimacy data collection

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

In the 12 months to 31 March 2016, North Wales Police recorded 255 public complaint cases per 1,000 officers, which was broadly in line with the England and Wales average of 268 cases per 1,000 officers. During this period, the force recorded 72 public complaint cases per 1,000 staff (including PCSOs), which was broadly in line with the England and Wales average of 61 cases per 1,000 staff (including PCSOs).

The most recent Independent Police Complaints Commission (IPCC) data from forces show that, for April, May and June 2016, the types of complaint most frequently recorded by North Wales Police are ‘other neglect or failure in duty’ and ‘oppressive conduct or harassment’.⁷ It is important to note, however, an issue

⁷ Independent Police Complaints Commission data are available at: www.ipcc.gov.uk/reports/statistics/police-complaints/police-performance-data

identified during our 2014 inspection on police integrity and corruption; ⁸ complaint allegation categories used by different forces may overlap with each other. For instance, similar allegations might be recorded by one force as 'other neglect or failure in duty', and by another force as 'other irregularity in procedure' or 'lack of fairness and impartiality'. This means there is no definitive way of establishing accurately the number of public complaints about certain behaviours.

The force seeks to connect with hard-to-reach communities by communicating and working closely with disability equality and lesbian, gay, bisexual and transgender groups. It has also worked with associations for the blind to understand better the concerns and issues faced by blind members of the public, and it engages with university students. It also meets every two months with the independent advisory group that scrutinises police involvement across a range of its work. The chief constable and police and crime commissioner take part in a mosque leaders' meeting every six months, and members of the public attend a stop and search board (a public encounters board) and a body-worn video scrutiny panel every six months. This means that communities within North Wales have the opportunity to express their views and can expect to be listened to by the police.

Identifying and understanding the issues

North Wales Police undertakes a range of activities better to understand those issues that have the greatest effect on public perceptions of fair and respectful treatment. It has a 'ride along' scheme, which gives people the opportunity observe routine police patrol activities. The force uses an independent panel for external review of its stop and search encounters. This panel includes young people and representation from minority communities. The review also includes examining body-worn video recordings. In the 2015 legitimacy inspection, HMIC said that not all grounds for stop and search were properly recorded or properly supervised. We were therefore pleased to see that the force has introduced additional training so that supervisors and staff fully understand the grounds required for stop and search. At the time of this inspection, the force told us they had recorded no complaints in respect of stop and search during the previous 12 months.

In August 2014, following HMIC's 2013 inspection on the effective and fair use of stop and search powers,⁹ the Home Office published guidance to police forces on

⁸ *Integrity matters*, HMIC, January 2015. Available from: www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/

⁹ *Stop and Search Powers – are the police using them effectively and fairly?* HMIC, July 2013. Available from: www.justiceinspectorates.gov.uk/hmic/publications/stop-and-search-powers-20130709/

how to implement the Best Use of Stop and Search (BUSS) scheme.¹⁰ The scheme aims to increase transparency and community involvement, and to support a more intelligence-led use of the powers leading to better outcomes. All police forces in England and Wales signed up to participate in the scheme. In 2015, HMIC's legitimacy inspection¹¹ considered the extent to which the force was complying with the scheme and found that it did not comply with all features of the scheme. In autumn 2016, HMIC will re-assess the force's compliance with those features of the scheme that it was not complying with in 2015. We will publish our findings in early 2017.

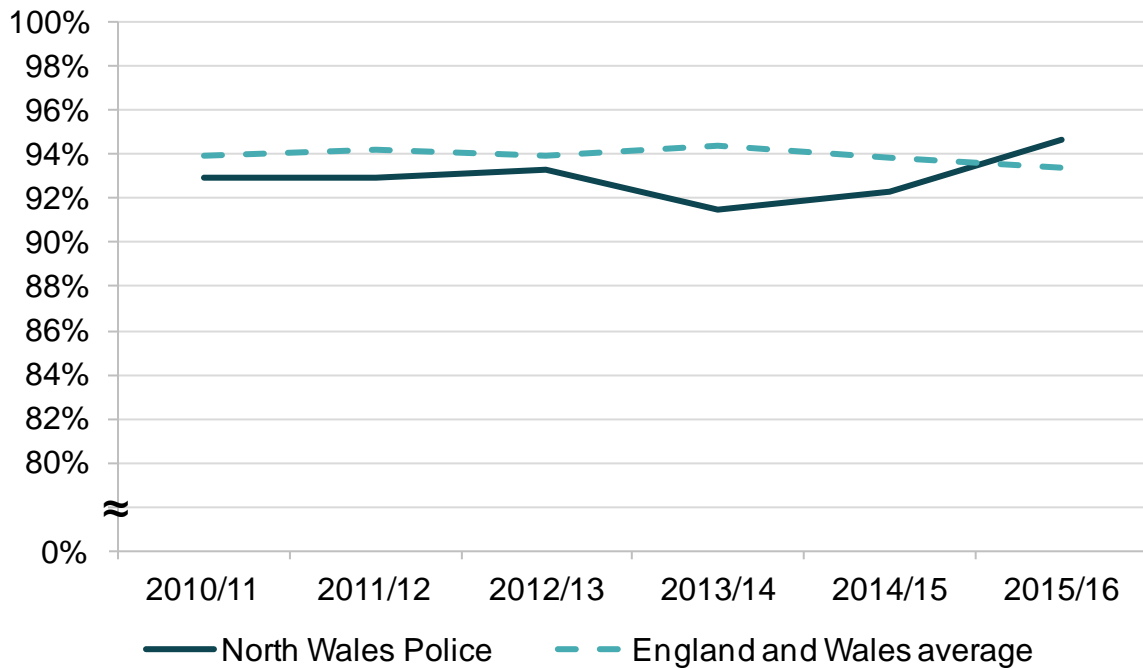
To increase public confidence, the force intends to issue body-worn video cameras to all officers and the police and crime commissioner has agreed to fund an additional 301 devices. Custody arrangements are scrutinised by independent custody visitors, who visit the force without warning, to check on the treatment and welfare of people held in custody.

All forces are required to conduct victim satisfaction surveys with specified victims of crime groups and provide data on a quarterly basis. The surveys take account of victims' experience of the service provided to them by the police and inform forces' improvements to their service provision, including examining how well victims feel they are treated.

¹⁰ Best Use of Stop and Search Scheme, Home Office, August 2014. Available at: www.gov.uk/government/uploads/system/uploads/attachment_data/file/346922/Best_Use_of_Stop_and_Search_Scheme_v3.0_v2.pdf

¹¹ *PEEL: Police legitimacy 2015 – A national overview*, HMIC, February 2016. Available at: www.justiceinspectorates.gov.uk/hmic/publications/police-legitimacy-2015/

Figure 2: Percentage of victims satisfied with overall treatment by North Wales Police compared with England and Wales, from the 12 months to 31 March 2011 to the 12 months to 31 March 2016



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

In the 12 months to 31 March 2016, 94.7 percent of all victims of crime (excluding hate crime) who responded to the victim satisfaction survey were satisfied with the overall treatment provided by North Wales Police, which was broadly in line with the England and Wales average of 93.4 percent; and higher than the 92.3 percent who were satisfied with the overall treatment that the force provided in the 12 months to 31 March 2015. This is a statistically significant difference.

At a strategic level, police activity is monitored through the quality of service and victim satisfaction boards. These boards review independent public data to assess user satisfaction, investigations and anti-social behaviour. This helps North Wales Police understand better its compliance with the victim’s code of practice, blockers to service and levels of confidence and satisfaction. The force then brings these findings to the attention of the confidence and ethical standards committee. There are also meetings of the independent advisory group, stop search board (public encounters board) and body-worn video scrutiny panel. Although members of the community have the opportunity to express their views and opinions through social media and public forums, there was less evidence to suggest that North Wales Police encourages specific feedback in respect of the extent to which people feel they are being treated fairly and with respect. The focus appeared to be more about improving service delivery and public engagement.

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

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

Making improvements

North Wales Police acts on feedback and learning to improve the way it treats the people it serves. The force provides feedback to the public through the Office of the police and crime commissioner on how it deals with complaints. The police and crime commissioner regularly reviews complaints and conducts investigations. For example, the police and crime commissioner recently advised the professional standards department to amend its complaints forms so that people from hard-to-reach communities were able to complete them. These forms are now easier to understand. The professional standards department produces 'lessons learnt', 'need to know' and 'top tips' bulletins, which highlight learning and good practice from outcomes of public complaints and allegations, including those published by the Independent Police Complaints Commission (IPCC). These internal publications focus on the negative impact of specific officer actions while also identifying concerns that attract attention and affect public confidence. These publications are intended to educate the workforce and avoid similar situations arising in the future.

The force welcomes independent custody visits. If an independent custody visitor inspection identifies an issue, custody officers either resolve the matter immediately or it is referred to the custody inspector. All feedback reports are analysed by the force and the office of the police and crime commissioner and are discussed at the independent custody visitors' panel meeting, which is held every three months. The force operations committee is chaired by the assistant chief constable. One of its principal objectives is to ensure that operational lessons are learnt. This includes locally identified emerging issues and external recommendations made by the IPCC, HMIC and others.

Demonstrating effectiveness

North Wales Police has taken some action to work with members of the public, including those who have less trust and confidence in the police. For example, the chief constable and police and crime commissioner take part in a six-monthly mosque leaders' meeting, and a PCSO is also assigned to work with those who attend the mosque. Members of the public can attend the stop and search board (public encounters board) and body-worn video scrutiny panels. This is in addition to scrutiny provided by the independent advisory group. The force has 'diversity teams'

based across the force area that consider local issues. For example, the deputy chief constable and assistant chief constable visited a Polish community because of concerns about its safety following the EU referendum. The force was able to provide reassurances in respect of taking hate crime seriously. The public in North Wales, including those who have less trust and confidence in the police, can expect to be treated with fairness and respect.

Summary of findings



Good

North Wales Police is good at treating all of the people it serves with fairness and respect. The force understands the importance of treating people with fairness and respect and the workforce understands the relationship between the force's vision and values and the Code of Ethics, and the importance of acting ethically.

North Wales Police can demonstrate that it seeks feedback and challenge from the people it serves using social media and a variety of data collection opportunities. The force's recently introduced local forums have focused on increased public participation to help improve the service it provides.

The force identifies and understands some of the issues that have the greatest impact on people's perceptions of fair and respectful treatment. This could be enhanced by gathering information from the various sources and analysing it to identify those issues that have the greatest impact on public perceptions of how they are treated by the police. The force has taken some action to communicate with members of the public, including those who have less trust and confidence in the police, and is open to external scrutiny.

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

In 2014, HMIC inspected the extent to which the police were acting with integrity and guarding against corruption.¹² Given the continued importance of this topic, we are returning in this question to those national recommendations emerging from the 2014 report from that inspection, that our 2015 legitimacy inspection did not cover. Our inspection focus this year also reflects research showing that prevention is better than cure: the best way to ensure that police workforces behave ethically is for the forces to develop an ethical culture and to have systems in place to identify potential risks to the integrity of the organisations, so that forces can intervene early to reduce the likelihood of corruption.¹³

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

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

Once recruited, one of the best ways to prevent corruption from occurring among the workforce is by establishing an ethical working environment or culture. To achieve this, forces need to clarify and continue to reinforce and exemplify acceptable and unacceptable standards of behaviour, including the Code of Ethics.¹⁴ This year, HMIC focused on assessing progress in those areas highlighted for improvement in our 2015 legitimacy inspection and our 2014 integrity and corruption inspection.

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

¹³ *Promoting ethical behaviour and preventing wrongdoing in organisations*, College of Policing, 2015. Available at:
http://whatworks.college.police.uk/Research/Documents/150317_Integrity_REA_FINAL_REPORT.pdf

¹⁴ *Promoting ethical behaviour and preventing wrongdoing in organisations*, College of Policing, 2015. Available at:
http://whatworks.college.police.uk/Research/Documents/150317_Ethical_leadership_FINAL_REPORT.pdf and *The role of leadership in promoting ethical police behaviour*, College of Policing, 2015. Available at:
http://whatworks.college.police.uk/Research/Documents/150317_Ethical_leadership_FINAL_REPORT.pdf and *Literature review – Police integrity and corruption*, HMIC, January 2015. Available at:
www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/

Initial vetting

North Wales Police vets applicants to ensure that it recruits officers, staff and volunteers with high standards of ethical behaviour in line with national vetting policies. The recruiting department is responsible for the initial vetting process. Applications are screened out if an applicant discloses criminal convictions, associations or financial vulnerabilities and are sent to the force vetting unit to decide whether to allow the application to proceed. This avoids the applicant going through the whole recruiting process, only to fail their vetting at a later stage. When necessary, the force interviews applicants face-to-face or by telephone to obtain further information or clarify the information they have supplied. When conducting vetting, staff consider the openness and honesty of the applicant. Although the force vets applicants to ensure that it recruits staff who will form an ethical workforce, it does not monitor rejection rates for applicants with protected characteristics (such as disability, sexual orientation or race). At the time of this inspection, the force had a backlog of 180 cases but had a plan in place to manage this number down. The force's human resources department and the vetting unit work closely to support the development of an ethical workforce. The force is confident that it is taking action to ensure its recruitment processes identify those officers, staff and volunteers who demonstrate high standards of ethical behaviour.

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

Clarifying and reinforcing standards of behaviour

North Wales Police has a comprehensive programme for reinforcing the importance of understanding what is considered acceptable and unacceptable behaviour. Staff and officers across a range of roles and grades, including volunteer staff, were clear in their understanding of what constitutes acceptable and unacceptable behaviour. This understanding is supported by the force's regular reference to the Code of Ethics and its vision and values. The force stresses the need to act ethically through the chief officer road shows, the 'It Matters' campaign, weekly professional standards department 'lesson learnt' bulletins, the force's quarterly 'Communicate' magazine and weekly 'orders', where reference is made to complaints and dissatisfaction, misconduct cases and allegations. More recently, the professional standards department has introduced scenario testing focused on a range of ethical dilemmas.

Staff and officers HMIC spoke to were able to describe a range of circumstances that accurately portrayed acceptable and unacceptable behaviour. They were also aware of the importance of highlighting potential risks to the organisation, such as a conflict in business interests or notifiable associations, and the requirement to declare gifts

and hospitality. The force's leadership courses include training to identify acceptable and unacceptable behaviour, and will also be included in the new annual performance appraisal. At a strategic level, this activity is referred to the force's confidence and ethical standards committee for review and oversight. Guidance is also provided through the quality of service and victim satisfaction boards. The people of North Wales can expect the police to understand the difference between acceptable and unacceptable behaviour.

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

HMIC's 2014 police integrity and corruption inspection emphasised the need for forces to make arrangements for continuous monitoring of their ethical health, through active monitoring of force systems and processes to spot risks to their integrity, including – but not limited to – business interests, gifts and hospitality, and public complaints.¹⁵ These findings reflect the research commissioned by the College of Policing, which highlights the importance of taking a problem-solving approach to preventing wrongdoing, by scanning and analysing police data to identify particular officers or hotspots for targeting prevention activity.

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

Identifying and understanding risks to integrity

North Wales Police has some understanding of the strategic risks posed to the integrity of the organisation. The most recent strategic threat assessment was carried out in 2014. A control strategy was completed at the same time and was reviewed, without an updated threat assessment, in June 2015. HMIC reviewed the control strategy and considers that it does not focus enough on preventing corruption, intelligence gathering or enforcement activity. Although the anti-corruption unit records intelligence against the National Crime Agency corruption categories, it does not carry out routine analysis of all available information and intelligence to identify emerging risks. Currently, the force does not have a complete understanding of risks to the organisation at a strategic level.

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

North Wales Police is taking action to ensure that the workforce understands the requirement to declare business interests, notifiable associations (including media), gifts and hospitality, and monitors and reviews such interests on an annual basis. Relevant guidance and advice is displayed on the force intranet, with links to policy and 'notification forms' for notifiable association procedure, gifts and hospitality, the confidential reporting procedure, secondary employment, business interests and Safecall (a confidential phone line for reporting misconduct). All registered business interests and notifiable associations are recorded and managed on the professional standards department (PSD) intelligence systems. Business interests are subject to annual reviews and notifiable associations are examined in accordance with the force's assessment of corruption risk. This activity is in line with HMIC's 2014 recommendation that all forces should have systems in place to assess and ensure compliance in respect of business interests and notifiable associations, and that the gifts and hospitality registers are maintained and audited. This means that the officers and staff employed by North Wales Police understand the need to declare conflicts of interest and that these records will be maintained and monitored to ensure that they do so.

North Wales Police uses a range of mechanisms to identify individual and organisational risks. The force undertakes political, economic, social, technological, environmental, legislative, and ethical scanning to identify risks. The force's risk manager provides risk awareness workshops so consideration of ethical behaviours is integral to risk identification and management processes. The risk manager also carries out risk reviews with local teams and departments, including the head of the PSD. This work is linked to the PSD strategic assessment, which includes an integrity action plan. The risk review process is overseen by the deputy chief constable. The force's risk strategy 2015–18 makes clear links to the Code of Ethics and integrity.

The force carries out vetting if there is a change in an individual's personal circumstances or when they move from one post to another, including posting to high-risk roles, and on promotion. As a result of this activity, it is possible for the force to identify individual risks to the organisation.

Intervening early to manage risks to integrity

North Wales Police is taking some action to understand, identify and monitor risks to the integrity of the organisation, and to intervene at an early stage when it identifies a risk. The PSD analyst monitors intelligence reports that are referred to the anti-corruption unit (ACU). The details and circumstances of these reports are raised at the professional standards department fortnightly tasking and co-ordinating meeting. Where appropriate, they are further investigated or scheduled for ethical interview at the earliest opportunity. The head of the PSD meets quarterly with force senior management teams and presents quarterly analytical data for each area. Emerging problems are highlighted and discussed at these meetings, including data relating to

intelligence reports on a range of topics, for example, inappropriate sexual behaviour. The PSD and ACU send out weekly bulletins covering lessons learned, 'need to know' and 'top tips'. Awareness sessions are provided to all recruits and there is a specific force intranet page containing advice on reporting methods, policy and the work undertaken to support staff.

The PSD and human resources (HR) department identify potential vulnerabilities at a 'people intelligence' meeting. They consider intelligence on staff and police officers who have been identified as potentially giving cause for concern, although there is no agreed process for deciding what information is shared. At the time of the inspection, the people intelligence meeting's terms of reference were being reviewed and the force was considering setting up a people intelligence board or developing a vulnerability matrix, as is the case with other police forces. In our view, HR and PSD are not making the most of this opportunity to understand, identify and monitor risks to the integrity of the organisation. The force should do more to accelerate this process and ensure a co-ordinated approach.

North Wales Police undertakes both random and intelligence-led drug testing. As a result of these measures the force is using preventative tactics to reduce the number of individual and organisational risks.

Looking for, reporting and assessing intelligence on potential corruption

North Wales Police has limited capacity to seek out and assess intelligence about potential corruption. The PSD and anti-corruption unit gather intelligence on potential corruption and vulnerability by promoting direct confidential reporting methods and third-party reporting through Safecall. This activity complies with HMIC's 2014 recommendation that all forces should have in place a confidential means of reporting wrongdoing, in which officers and staff have confidence. ACU staff also have contact meetings with area inspectors throughout the force to encourage more direct reporting, increase manager confidence and, if appropriate, triangulate intelligence received. This is in addition to the meetings between PSD senior managers and area business leads.

However, capacity within the ACU is a concern. The relatively small number of staff means that they cannot take on as many cases as they would like, nor can they undertake regular proactive work to explore more fully emerging areas of risk to the organisation. The force should consider whether it has sufficient capacity within the ACU to improve oversight and its ability to seek out corruption – as opposed to responding to reports – and to take on a greater number of proactive cases.

North Wales Police is not maximising all opportunities to identify risk by seeking intelligence on corruption proactively, due to capacity issues within the anti-corruption unit. At the time of our inspection there were 30 live and supporting intelligence cases. There was one detective inspector, two constables and one

civilian investigator to manage this workload, which appeared to be insufficient. Some of the intelligence received in the ACU that should be developed further is not progressed because of limited resources in the ACU.

The force receives intelligence from a range of sources, including women's aid organisations, the probation service and the force's protecting vulnerable people unit, to help identify potentially corrupt officers. Staff indicated that they would like to extend this activity, but were limited by capacity issues, which limits their ability to develop potential intelligence proactively. The intelligence system used by the force to store information can be searched and can be used to produce management information reports. All intelligence reports viewed are linked to subjects and the system can also be used to manage documents scanned onto the system. Registered business interests and reportable associations are now recorded and managed on professional standards department intelligence systems. While the force can demonstrate that it has a range of effective intelligence systems, there was less evidence that these were being used to undertake analysis of future demand. In 2014 HMIC recommended that North Wales Police should ensure it has the necessary capability to develop and assess corruption-related intelligence. This year we found that capacity issues within the anti-corruption unit meant that the force is not maximising the opportunity to gather and develop intelligence from a wide range of sources.

HMIC did not find any evidence of significant delays in the initial assessment of intelligence referrals, although some corruption intelligence is not subsequently developed. All intelligence received by the PSD is assessed, graded and prioritised for development in line, with the force control strategy and prioritisation of tasks is based on an assessment of risk and harm. Since 2014, intelligence referrals have increased from 172 (2014) to 276 (2015), with a year-end projection of over 300. These figures exclude all business interests and reportable associations' records. In accordance with national policy and the professional standards control strategy, North Wales Police undertakes both random and 'with cause' or intelligence-led drug testing. The force last undertook random drug testing at the end of 2015, and plans to do so again this year. In the last 12 months there have been two occasions when 'with cause' testing took place after the force received credible intelligence. North Wales Police is able to identify corruption as a result of using a range of techniques, including random drug testing, but needs to address capacity issues within the anti-corruption unit.

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

In 2012 the Independent Police Complaints Commission (IPCC) and Association of Chief Police Officers (ACPO) published *The abuse of police powers to perpetrate sexual violence*.¹⁶ This report states that “the abuse of police powers for purposes of sexual exploitation, or even violence, is something that fundamentally betrays the trust that communities and individuals place in the police. It therefore has a serious impact on the public’s confidence in individual officers and the service in general.” The report identified this behaviour as a form of serious corruption that forces should refer to the IPCC for its consideration of how it should be investigated.

The Code of Ethics¹⁷ – which sets out the standards of professional behaviour expected of all policing professionals – explicitly states that they must “not establish or pursue an improper sexual or emotional relationship with a person with whom [they] come into contact in the course of [their] work who may be vulnerable to an abuse of trust or power”.

The most recent national counter corruption assessment, in 2013, highlighted corruption for the purposes of sexual gratification as a major threat to law enforcement.¹⁸ HMIC’s 2015 report *Integrity matters*¹⁹ identified police sexual misconduct as an area of great concern to the public. We share the public’s disquiet and so we looked at this issue specifically as part of our 2016 inspection. Our work was given additional emphasis in May 2016 by a request from the Home Secretary that we inspect forces’ response to the issue of officers and staff developing inappropriate relationships with victims of domestic abuse and abusing their position of power to exploit victims.

¹⁶ *The abuse of police powers to perpetrate sexual violence*, jointly published by IPCC and ACPO (now the National Police Chiefs’ Council), September 2012. Available at: www.ipcc.gov.uk/sites/default/files/Documents/research_stats/abuse_of_police_powers_to_perpetrate_sexual_violence.PDF

¹⁷ Code of Ethics – A Code of Practice for the Principles and Standards of Professional Behaviour for the Policing Profession of England and Wales, College of Policing, London, July 2014. Available at: www.college.police.uk/What-we-do/Ethics/Documents/Code_of_Ethics.pdf

¹⁸ Every three years, the National Counter Corruption Advisory Group commissions a strategic assessment of the threat to law enforcement from corruption. The most recent assessment was completed in June 2013 by the Serious Organised Crime Agency. The assessment was based upon three years of intelligence reports on possible corruption gathered by forces in England and Wales, supplemented by information from other forces and national agencies. The NCA is due to publish the latest assessment in 2016.

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

Recognising abuse of authority for sexual gain as serious corruption

North Wales Police has a zero-tolerance approach to misconduct that is sexually motivated. This is a PSD control strategy priority. Officers and staff HMIC spoke with had no difficulty in recognising abuse of authority for sexual gain as a matter of serious corruption. The PSD had recently circulated a bulletin highlighting the risks involved and expected standards of behaviour when dealing with vulnerable victims. Any complaints that are referred for recording to the PSD are assessed by senior managers and, if sexual misconduct is identified, they are automatically referred to the IPCC.

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

North Wales Police includes the subject of sexual misconduct in its control strategy, but only in general terms. There is no anti-corruption unit threat assessment and sexual misconduct is not specifically mentioned as an abuse of authority. The last two anti-corruption unit (ACU) control strategies have been based on the National Crime Agency assessment in 2014. The force's control strategy was due to be reviewed at the same time as the publication of the revised National Crime Agency assessment in early 2016, but this has been delayed until later in 2016. The ACU detective inspector assesses intelligence received by the PSD. If this intelligence cannot be developed to support a misconduct investigation, it is assessed to see whether early intervention using an ethical interview is possible or otherwise kept on record as intelligence and subject to further reviews. All such referrals of intelligence are held on the ACU intelligence system and retained after review in accordance with management of police information guidance. However, capacity issues within the ACU limits its ability proactively to seek intelligence on a range of issues.

Taking action to prevent abuse of authority for sexual gain

North Wales Police takes action to prevent abuse of authority for sexual gain. As part of its measures to actively promote the Code of Ethics across the force, the PSD's training material and presentations include references to sexual misconduct, risk factors and signal behaviours that staff are encouraged to report. This form of abuse is also discussed at force-level meetings, such as the protecting vulnerable person's board, for senior managers working in all areas of policing involved with domestic violence and contact with vulnerable people. The force helps refer concerns from other professionals working with vulnerable people, through for example, the integrated offender management units, where local authority staff work alongside the police.

The professional standards department provides training on abuse of authority for sexual gain to newly-promoted sergeants and as part of the leadership development programme. This includes a classroom, role-play training scenario that demonstrates how this type of inappropriate sexual behaviour can develop to highlight how to

intervene and take positive action. The force publicises the outcome and details of all proven gross misconduct cases, including a summary of the behaviour exhibited, to act as a deterrent and to raise awareness of expected standards of professional behaviour. Officers and staff understand the risks to themselves and the organisation of the abuse of authority for sexual gain.

Building public trust

North Wales Police takes action to publicise the outcome of cases concerning the abuse of authority within the force. For example, details of a police detective who used work software to spy on his former partner who worked for the force were discussed at a disciplinary panel and released to the press. The detective had used official systems on 286 occasions to monitor the activities of the woman concerned. After a two-day hearing, the officer was found guilty of accessing police computers for personal reasons and disobeying instructions from his superiors. He was sacked without notice after admitting six allegations of misconduct.

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

HMIC's 2014 literature review on police integrity and corruption²⁰ emphasised the importance of collection and dissemination of information about misconduct to the public, on the basis that it shows police forces are taking the problem seriously, and detecting and punishing wrongdoing. This information also forms the basis for deterring misconduct and enhancing integrity within police forces themselves. This year, HMIC looked at how well forces engage with the public online and through police officer misconduct hearings in public, and also more widely following high profile incidents with the potential to undermine public perceptions of police integrity. We also looked at how aware the workforce is of these outcomes.

Working with the public

North Wales Police is working closely with the public to keep them informed about cases of misconduct and corruption. In accordance with police conduct regulations, the force publicises the outcome of police officer misconduct hearings on its webpage and releases details of outcomes through the media. After 28 days the misconduct outcome data are removed from the website, in line with requirements, but the force may wish to consider extending this, and include police staff outcomes, in the interests of increasing openness.

²⁰ *Literature review – Police integrity and corruption*, HMIC, January 2015. Available at: www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/

The force website provides information about forthcoming public misconduct cases and details of how members of the public can attend. Details of disapproved gifts, for example alcohol and gift vouchers, are also published externally on the force's website within the gifts and hospitality register. The information provided is easy to find and of a good quality, including the rank of the officer, the gift and/or hospitality offered, its value and whether it was accepted or declined.

Working with the workforce

North Wales Police undertakes a range of activities to ensure that its workforce is informed about cases of misconduct and corruption. The head of the PSD has quarterly meetings with all area senior management teams to highlight appropriate learning for senior managers arising from misconduct meetings and hearings. The PSD sends weekly bulletins to all staff that include the outcomes of misconduct and corruption cases, and names the people involved. The 'need to know' training bulletin is designed to improve corporate knowledge of high-risk low-frequency events. It also covers topical issues to encourage learning, introduce new policies and increase awareness of the misconduct process.

The PSD also sends out 'Top tips Tuesday' once a month, which provides scenarios and ethical dilemmas for staff to consider. The lessons learned bulletin is based on real-life cases dealt with by the PSD and provides further guidance about acting ethically. As a consequence, staff and officers spoken with during the inspection had an excellent understanding of the standards expected of them and of the negative consequences of failing to act in an ethical manner.

Summary of findings



Requires improvement

North Wales Police requires improvement to ensure that its workforce behaves ethically and lawfully. The force can demonstrate that it vets applicants to ensure that it recruits officers, staff and volunteers with high standards of ethical behaviour. It also has a comprehensive programme of action that reinforces the importance of acceptable and unacceptable behaviour. It can demonstrate that it is taking action to ensure that the workforce understands the requirement to declare business interests, notifiable associations (including media), gifts and hospitality.

However, we found North Wales Police has limited understanding of the strategic risks to the integrity of the organisation as its strategic threat assessment is out of date and it has limited capacity to seek out and develop all intelligence about potential corruption. The force has some systems in place for identifying individual and organisational risk and is taking some action to intervene at an early stage.

North Wales Police has a zero-tolerance approach to sexually motivated misconduct and takes action where it suspects the abuse of authority for sexual gain is taking place. This is a PSD control strategy priority. The force informs the public and its workforce about misconduct outcomes, although not all outcomes are published.

Areas for improvement

- The force should review the capacity of its anti-corruption unit to ensure the unit is capable of seeking out misconduct and corruption, and developing intelligence once it is received.
- Annually, the force should produce a local counter-corruption strategic assessment and control strategy, to identify risks to its integrity.

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

A workforce that feels it is treated fairly and with respect by its employers is more likely to identify with the organisation, and treat the public in a similarly fair and respectful way. Conversely, perceived unfairness within police organisations can have a detrimental effect on officer and staff attitudes and behaviours.²¹ As such, this concept of ‘organisational justice’ and its potential impact on ‘procedural justice’ forms an important part of HMIC’s assessment of police legitimacy. As there is no comparative data on how fairly officers and staff perceive forces to have treated them, we focused our assessment on how well forces identify these perceptions within their workforces and act on these findings. In particular, we looked at the extent to which organisational ‘fairness’ is reflected through the way individual performance is managed, and how ‘organisational respect’ is reflected through how forces provide for the wellbeing of their workforces, particularly through preventative and early action.

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

Research suggests that forces that involve officers and staff in decision-making processes, listen to their concerns, act on them, and are open about how and why decisions were reached, may improve workforce perceptions of fair and respectful treatment.²² On this basis, HMIC assessed how well the force engages with its staff to identify and understand the issues that affect them, and how well it acts on these issues and demonstrates it has done so.

Identifying and understanding the issues

North Wales Police uses a number of methods to seek the views of its workforce, including chief officer road shows, a suggestion scheme, a ‘lifestyle’ matters survey and an annual cultural survey. The force has used the annual cultural survey for several years and it gives all staff the opportunity to provide feedback on their experiences of working for North Wales Police. It also helps identify scope for further

²¹ *Fair cop 2: Organisational justice, behaviour and ethical policing*, College of Policing, 2015.

Available at:

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

²² *Fair cop 2: Organisational justice, behaviour and ethical policing*, College of Policing, 2015, page 11. Available at:

http://whatworks.college.police.uk/Research/Documents/150317_Fair_cop%202_FINAL_REPORT.pdf
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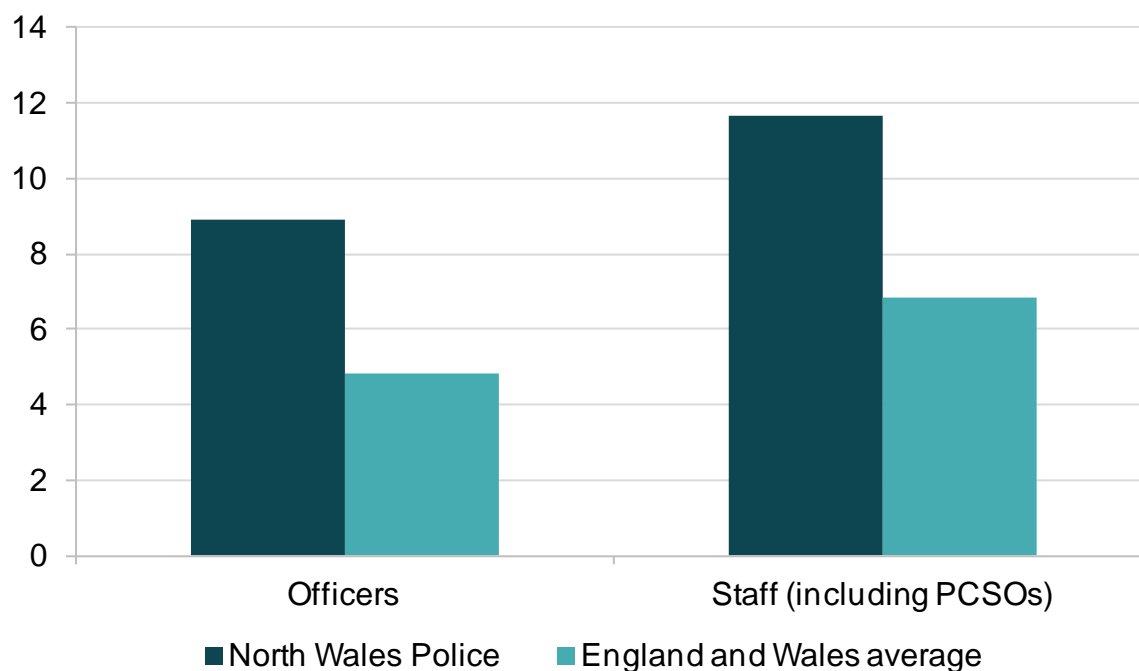
development, for example in terms of leadership. The most recent survey focused on integrity and the Code of Ethics. The results of the survey have led to changes in several areas. More recently, the assistant chief constable introduced 'Bend the boss's ear', which gives its workforce the opportunity to meet a member of the chief officer team or other senior manager to raise any issues or concerns, and to provide feedback in respect of changes they would like to see. These sessions aim to encourage open dialogue and conversation so that chief officers gain a greater understanding of the issues of concern to staff across the organisation. This will require commitment from the senior management team to ensure that enough time is set aside for this purpose, so that the credibility of the scheme and senior managers is not undermined. The range and number of engagement activities operated by the force means that the officers and staff have the opportunity to voice their opinions to those who can act on them.

Making improvements and demonstrating effectiveness

North Wales Police has taken some action to improve those areas identified by the workforce as requiring improvement. For example, the sergeants' promotion process was changed following feedback from officers received through the cultural survey, and is now competence and evidenced-based rather than solely interview-based. Despite the various methods of communication within North Wales Police, some officers and staff still felt excluded from recent changes to the operating model, believing that the force was indifferent to their views and opinions, and that feedback about the decisions on changes was not always forthcoming. Some also felt the staff suggestion scheme was not effective because not all suggestions were acknowledged. The force needs to do more to publish the outcomes of discussions with staff. Decision makers also need to explain why staff suggestions are not adopted, so that the workforce feels more included in the consultation process. North Wales Police does not demonstrate to the workforce that it is involving all officers and staff in the consultation process because communication could be better in terms of feedback.

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

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



Source: HMIC Legitimacy data collection

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

In the 12 months to 31 March 2016, North Wales Police finalised 8.9 formal grievances raised by officers per 1,000 officers, which was higher than the England and Wales average of 4.8 per 1,000 officers. During this period, the force finalised 11.6 formal grievances raised by staff per 1,000 staff (including PCSOs), which was higher than the England and Wales average of 6.8 per 1,000 staff (including PCSOs).

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

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

Understanding and valuing the benefits

North Wales Police is aware of the importance and value of promoting wellbeing and takes action to ensure that the benefits are also understood by the workforce. The force established a wellbeing board in 2015. The board is chaired by a senior officer and is linked to the force's people strategy. The force has policies and groups designed to support the wellbeing of its workforce. Overall, staff and officers have access to a range of sources designed to improve wellbeing.

In May 2015, the force received a gold award in the Welsh Assembly's corporate health standard, which is a national quality mark for health and wellbeing in the workplace. It recognises organisations that protect and promote the health and wellbeing of employees.

Identifying and understanding the workforce's wellbeing needs

North Wales Police has some processes in place to identify wellbeing issues and concerns. The force undertook a 'lifestyle matters' survey in March 2016, which staff were encouraged to complete, and its findings will influence the future direction and focus of the lifestyle matters health and wellbeing programme. The survey results identified psychological and mental health as the main issue, followed by muscular-skeletal problems.

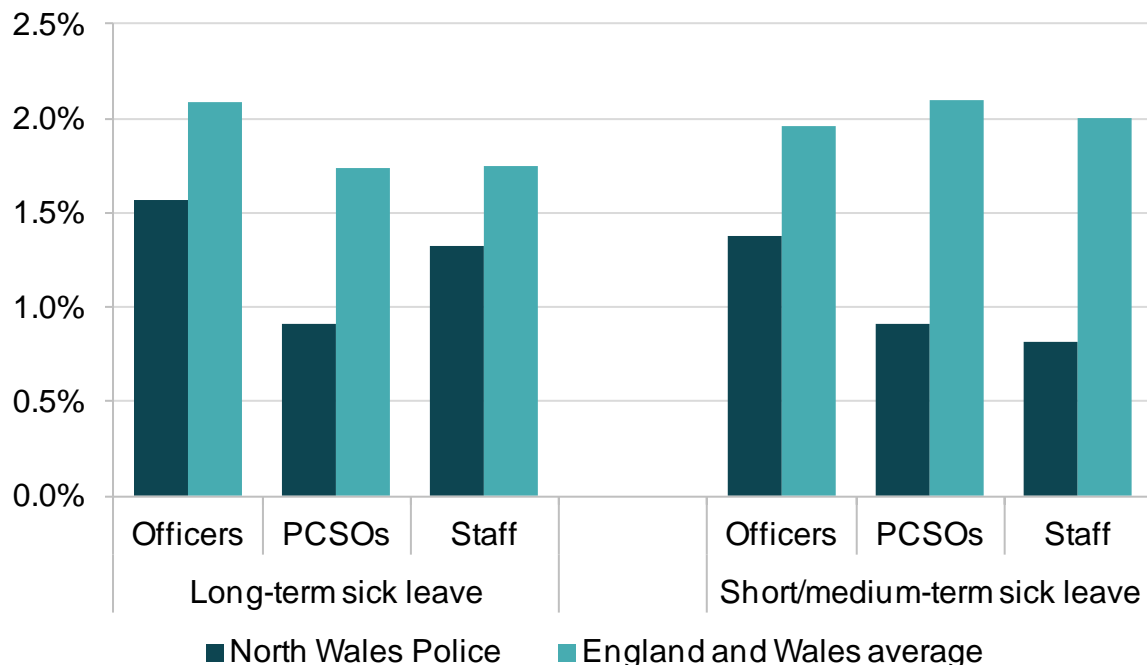
The force monitors assaults on staff, and reviews and discusses monthly updates at its conflict management board to identify any trends so that it can act to avoid similar situations in the future. It undertakes case reviews to encourage improvement and provide supportive management. The force can review any absences at management-level screening panels, no later than three months after the absence started. The panels review cases that look likely to result in a case and pay review (which considers reducing a staff member's pay or even dismissal), and monitor people who have returned to work on light duties. Human resources, the occupational health unit manager and the staff association and/or trades union representatives are involved in this process.

Staff welfare is discussed as part of leadership courses for supervisors, sergeants and inspectors with topics that include drinking in work, drug testing and welfare following officer attendance at critical incidents. While the force has taken preventative action at an organisational level, supervisors felt that they had not received enough training to recognise the early warning signs of ill health, particularly mental health issues. As a consequence, they felt ill-equipped to offer advice to their staff. In general, officers and staff felt that staff welfare was a matter for the individual and their immediate line manager, with the force offering little practical assistance or help.

Sickness data can provide a useful point of comparison for assessing the wellbeing of police workforces. Analysis of this data can also help forces to identify and

understand the nature and causes of sickness at individual and organisational levels, and inform targeted activity to prevent and manage sickness.

Figure 4: Percentage of officers, police community support officers and staff on long-term and short/medium-term sick leave in North Wales Police compared with England and Wales, as at 31 March 2016



Source: Home Office Annual Data Requirement

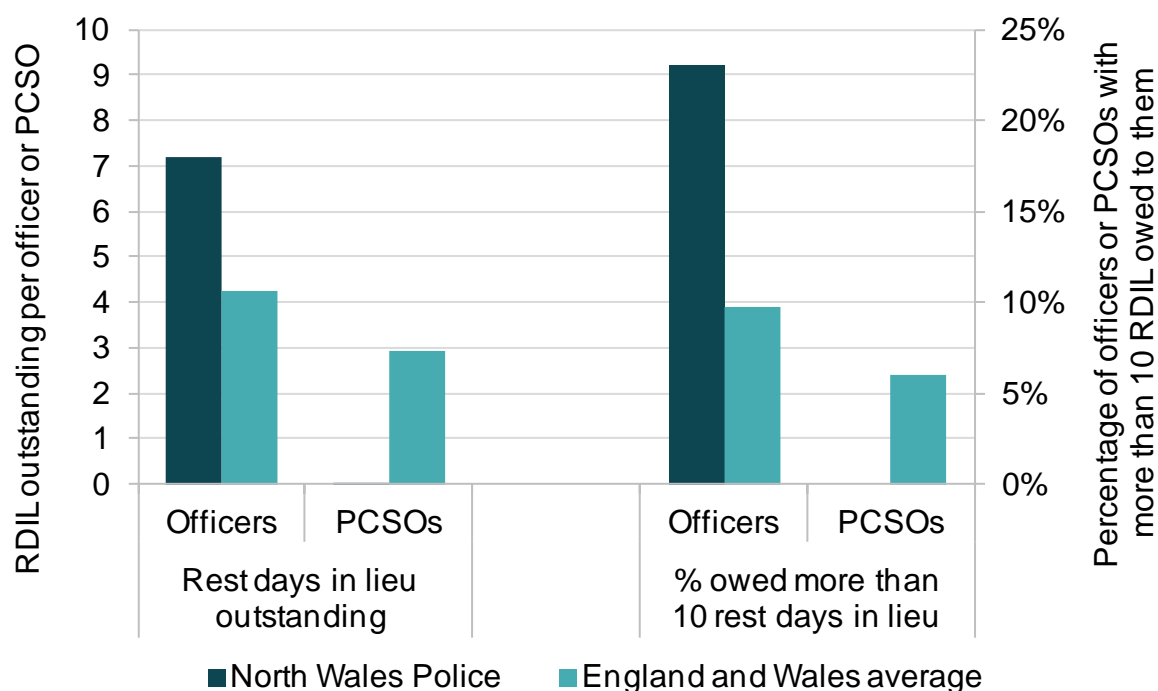
Note: Long-term sickness is defined as an absence due to sickness that has lasted for more than 28 days as at 31 March 2016. For further information about the data in figure 4 please see annex A.

Figure 4 provides data on the proportion of officers, PCSOs and staff who were absent due to sickness on 31 March 2016.

- 1.6 percent of officers were on long-term sick leave, which is broadly in line with the England and Wales average of 2.1 percent.
- 1.4 percent of officers were on short or medium-term sick leave, which is lower than the England and Wales average of 2.0 percent.
- 0.9 percent of PCSOs were on long-term sick leave, which is broadly in line with the England and Wales average of 1.7 percent.
- 0.9 percent of PCSOs were on short or medium-term sick leave, which is lower than the England and Wales average of 2.1 percent.
- 1.3 percent of staff were on long-term sick leave, which is broadly in line with the England and Wales average of 1.7 percent.
- 0.8 percent of staff were on short or medium-term sick leave, which is lower than the England and Wales average of 2.0 percent.

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

Figure 5: Number of rest days in lieu outstanding per officer or police community support officer (PCSO) and the percentage of officers or PCSOs with more than 10 rest days in lieu owed to them in North Wales Police compared with England and Wales, as at 31 March 2016



Source: HMIC Legitimacy data collection

Note: For some police forces data about the number of rest days in lieu outstanding are estimated from data on hours owed. For further information about the data in figure 5 please see annex A.

As at 31 March 2016, there were 7.2 rest days in lieu outstanding per officer in North Wales Police, which was higher than the England and Wales average of 4.2 days per officer. On the same date, there were 0.1 rest days in lieu outstanding per PCSO in the force, which was lower than the England and Wales average of 2.9 days per PCSO. As at 31 March 2016, 23.0 percent of officers in North Wales Police had more than 10 rest days in lieu owed to them, which was higher than the England and Wales average of 9.8 percent. As at 31 March 2016, no PCSOs in North Wales Police had more than 10 rest days in lieu owed to them. The England and Wales average was 6.0 percent of PCSOs. The data on PCSOs did not allow a comparison with the average.

Taking preventative and early action to improve workforce wellbeing

North Wales Police takes some preventative action to improve workforce wellbeing. The force introduced a lifestyle matters intranet site in 2015. This provides an interactive source of support, signposting, advice and guidance to all staff and managers on the principal elements of the lifestyle matters programme: healthy body, healthy mind, healthy work-life and healthy finances. However, officers and staff we spoke with were concerned about the withdrawal of the independent counselling service at the start of 2016, without notice or explanation. They were also concerned that there was now far greater reliance on self-help and obtaining support from their own GP rather than having access to specialists within the force's occupational health service. Officers and staff felt that the force was now more likely to suggest stress and mental health issues were dealt with by a GP or other external body, rather than offer an assessment within the force.

The force accepts that the counselling service to staff was temporarily halted due to contractual issues, but it continues to provide a service to staff employed in specialist or sensitive roles. The force did not however, communicate this effectively at the time. Its counselling service has since resumed and is available to all staff.

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

College of Policing research on organisational justice suggests that lack of promotion opportunities and not dealing with poor performance may adversely affect workforce perceptions of fairness, which in turn may lead to negative attitudes and behaviours in the workplace.²³ HMIC assessed how fairly and effectively the force manages the individual performance of its officers and staff, including the extent to which the process aligns with guidance produced by the College of Policing.²⁴

The performance assessment process

North Wales Police cannot yet demonstrate that its new performance assessment process is fair and effective because the performance assessment process has only recently been reintroduced after a long suspension. The force has informed us that the new performance development review process (referred to by the force as continuous professional development or CPD) is being used by all officers and staff but those we spoke with had limited understanding about what the new process involved, and some had no idea that a new force-wide CPD scheme existed at all.

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

Available at:

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

²⁴ College of Policing guidance on the police performance development review process is available at: www.college.police.uk/What-we-do/Support/Reviewing-performance/Pages/PDR.aspx

In the absence of a defined performance development review process, some staff had initiated their own one-to-one meetings with managers while others relied on monthly performance reviews. The force has an inconsistent approach to its monthly performance reviews, which are not mandatory. These reviews take place infrequently and are used to review performance rather than develop the individual. Some officers and staff were ambivalent about the new CPD process because the old system was seen as 'burdensome and bureaucratic'. The force needs to do more to explain the new CPD process and to communicate its benefits to the entire workforce. Until it is fully integrated and understood, officers and staff working for North Wales Police cannot be assured that standards of reporting are consistently applied or that the process is without bias.

The results of performance assessment

North Wales Police cannot yet demonstrate that its new annual performance assessment process is effective and fair. Monthly performance reviews are not mandatory and do not monitor learning and developmental needs or encourage career progression. Completion of the monthly performance reviews is inconsistent, depending on the attitude of the line manager. As a result, some staff receive a more comprehensive monthly performance review than others.

In general, officers and staff did not feel that the force was good at recognising good performance, and that any recognition was slow. They felt that the force focused more on poor performance, which it would take quick action to address. In this respect, the officers felt undervalued. While officers realised that the force addressed poor performance quickly, they felt that it focused on specific incidents rather using a structured approach to performance appraisal (i.e. through an understanding of development needs to support learning). Some staff felt that force-wide recognition was focused on specialist teams rather than generalist workers but they were aware of the 'nominate your mate' scheme, which encourages all staff to recognise and report good work.

The force cannot identify good and poor performance quickly without a recognised annual performance assessment; good performance will not receive the recognition that it deserves and poor performance will not be challenged. North Wales Police cannot be certain that it is managing its workforce effectively. It is hoped that the recent re-introduction of a formal annual performance assessment will address these concerns, but at the time of this inspection, the force did not have a fair or effective measure of development for the entire workforce.

Summary of findings



Requires improvement

North Wales Police requires improvement in how it treats its workforce with fairness and respect. The force seeks the views of the workforce in several ways and has taken some action on areas identified by the workforce as requiring improvement. The force is aware of the importance and value of promoting wellbeing and takes action to ensure that the benefits are also understood by the workforce. However, at the time of our inspection, officers and staff were concerned about the extent to which they could access wellbeing services. The force has some processes in place to identify wellbeing issues and concerns, but not all of the workforce feels equipped to recognise the signs of ill health involving mental health issues, including stress at work. At the time of our inspection the force's recently introduced annual performance process was not yet understood or perceived to be fair and effective by the entire workforce.

Areas for improvement

- The force should ensure that its supervisors can recognise and provide support in relation to wellbeing issues.
- The force should improve workforce access to occupational health provision.
- The force should improve how it manages individual performance of officers and staff.

Next steps

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

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

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

Annex A – About the data

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

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

Methodology

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

Comparisons with England and Wales average figures

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

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

Statistical significance

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

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

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

Population

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

Force in numbers

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

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

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

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

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

Figures throughout the report

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

The Independent Police Complaints Commission (IPCC) defines a complaint for the purposes of recording as "an expression of dissatisfaction by a member of the public with the service they have received from a police force. It may be about the conduct of one or more persons serving with the police and/or about the direction and control of a police force". A police complaint can be about more than one officer or member of staff and can refer to one or more allegations.²⁵

Data used in figure 1 are data extracted from the Centurion case recording and management system for Police Professional Standards data. We were able to collect the majority of this data through an automated database query, written for us by the creators of the software, Centurion (FIS Ltd). Forces ran this query on their systems

²⁵ Guidance on the recording of complaints under the Police Reform Act 2002, Independent Police Complaints Commission. Available at: www.ipcc.gov.uk/sites/default/files/Documents/statutoryguidance/guidance_on_recording_of_complaints_under_PRA_2002.pdf

and returned the outputs to us. This system is used in 41 of the 43 forces inspected. In order to collect the appropriate data from the two forces not using Centurion (Greater Manchester Police and Lancashire Constabulary), they were provided with a bespoke data collection template designed to correspond to information extracted from the Centurion database.

Although the IPCC categories used to record the type of public complaint and the accompanying guidance are the same in all police forces, differences in the way they are used still may occur. For example, one force may classify a case in one category while another force would classify the same case in a different category. This means that data on the types of public complaint should be treated with caution.

Figure 2: Percentage of victims satisfied with overall treatment compared with England and Wales, from the 12 months to 31 March 2011 to the 12 months to 31 March 2016

Forces are required by the Home Office to conduct satisfaction surveys with specific victim groups. Victim satisfaction surveys are structured around core questions exploring satisfaction with police responses across four stages of interactions: initial contact, actions, follow up, treatment plus the whole experience. The data in figure 2 use the results to the question on treatment, which specifically asks "Are you satisfied, dissatisfied or neither, with the way you were treated by the police officer and staff who dealt with you?"

When comparing with the England and Wales average, the standard methodology described above has been used. When testing whether the change in percentage of respondents who were satisfied between the 12 months to 31 March 2015 and the 12 months to 31 March 2016 is statistically significant, a chi square hypothesis test for independence has been applied.

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

The data refer to those grievances that were subject to a formal process (not including issues informally resolved with a line manager). Some of the grievances finalised in this period may have been raised in a previous year. Finalised refers to grievances where a resolution has been reached, after any appeals have been completed. Differences between forces in the number of finalised grievances may be due to different handling and recording policies. Data used in figure 3 were provided to HMIC by individual forces via a bespoke data collection in April 2016 prior to inspection.

Figure 4: Percentage of officers, police community support officers and staff on long-term and short/medium-term sick leave compared with England and Wales, as at 31 March 2016

Long-term sickness is defined as an absence due to sickness that has lasted for more than 28 days as at 31 March 2016. Data used in figure 4 were obtained from Home Office annual data returns 501 and 551. Data on long-term absences can be found in the Home Office police workforce open data tables:

www.gov.uk/government/statistics/police-workforce-open-data-tables

Figure 5: Number of rest days in lieu outstanding per officer or police community support officer (PCSO) and the percentage of officers or PCSOs with more than 10 rest days in lieu owed to them compared with England and Wales, as at 31 March 2016

Rest days in lieu are leave days owed to officers or police community support officers when they have been required to work on their scheduled rest day due to operational reasons. Data used in figure 5 were provided to HMIC by individual forces via a bespoke data collection in April 2016 prior to inspection.