



Promoting improvements
in policing to make
everyone safer

PEEL: Police legitimacy 2016

An inspection of Nottinghamshire Police



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Introduction

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

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

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

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

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

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

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

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

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

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

Force in numbers



Workforce

Total workforce as of 31 March 2016

3,307

Total workforce breakdown as of 31 March 2016

officers

1,973

staff

1,119

PCSOs

214



Ethnic diversity

Percentage of BAME in workforce 31 March 2016

overall workforce

4.4%

officers

4.4%

staff

4.6%

PCSOs

3.3%

Percentage of BAME in local population, 2011 Census

11.2%



Gender diversity

Percentage of females in overall workforce 31 March 2016

40%

England and Wales population, 2011 Census

51%

Percentage of females by role 31 March 2016

Nottinghamshire Police

officers

28%

staff

60%

PCSOs

48%



Public complaints

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

Officers

Nottinghamshire Police

447

England and Wales force average

268

Staff (including PCSOs)

83

61



Grievances

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

Officers

Nottinghamshire Police

10.1

England and Wales force average

4.8

Staff (including PCSOs)

21.7

6.8



Victim satisfaction

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

Nottinghamshire Police

94.6%

England and Wales force average

93.4%

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

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

Overall judgment³



Good

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

The force continues to reinforce the importance of treating people with fairness and respect and to ensure that its workforce behaves ethically and lawfully. It values workforce wellbeing and identifies and understands those issues that have the greatest impact on workforce perceptions of fair and respectful treatment. However, it is not able to demonstrate whether its performance assessment process is fair or effective.

Overall summary

Nottinghamshire Police is good at treating the people it serves with fairness and respect and its importance is understood by the workforce. The force seeks feedback and challenge from the people it serves, including those who have less trust and confidence in the police or are less likely to complain. It conducts victim surveys and surveys of those who have made complaints and also works with an independent advisory group (IAG) and a stop and search scrutiny board that include members of the public from diverse groups. However, although the force acts on learning and feedback, it does not always demonstrate clearly what action it has taken.

The force makes good use of social media and its website, which is easily accessible to those people whose first language is not English because it can display text in over 150 different languages. It has also considered the needs of people with sight or hearing problems, or dyslexia.

Nottinghamshire Police continues to ensure that its workforce behaves ethically and lawfully, although there are gaps in its vetting processes to ensure that designated posts are vetted to a specific standard. The force has an ethical culture and the

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

workforce understands what serious corruption is and how to report it. Staff and officers are aware of the gifts and hospitality register and notifiable associations procedure.

The force clarifies and reinforces unacceptable behaviour effectively. The force intranet contains very good reference material, and the Integrity matters newsletter provides real-life examples linked to the Code of Ethics.⁴ Officers and staff, including volunteers, have a good understanding of these standards. The force proactively and effectively identifies and manages the threat, risk and harm from corruption. It also identifies early warning signs of potential risks to integrity and corruption and shares information internally and with other forces.

Nottinghamshire Police recognises abuse of authority for sexual gain (taking advantage of a position of power to exploit vulnerable victims of crime) as serious corruption. The workforce are clear that this behaviour is unacceptable. The force deals with it robustly by dismissing officers or staff and prosecuting them in court.

The force publicises misconduct hearings on its public website, including information about how to attend open hearings. The outcomes from gross misconduct and misconduct findings are also publicised on the force's intranet and include the names of those involved.

Nottinghamshire Police needs to improve how it treats its workforce with fairness and respect. It is good at using a variety of methods to understand workforce perceptions, including: a people survey, a suggestion scheme, a people board, meetings with unions, the police federation, staff associations and staff networks, and exit interviews with those leaving the force. In addition, it conducts interview sessions with under-represented groups to better understand their views. However, the force needs to improve how it shares information about the actions it takes in response to workforce concerns.

The force actively monitors workforce diversity, complaints, misconduct and grievances, but we found that staff sometimes feel grievances are not dealt with effectively, with no action taken or no formal response provided.

The force's understanding of the wellbeing needs of its workforce is generally good and is improving, although its provision is more reactive than preventative. It provides gyms and a sports and social club as well as a website called 'Working well

⁴ *Promoting ethical behaviour and preventing wrongdoing in organisations*, College of Policing, 2015. Available at:

http://whatworks.college.police.uk/Research/Documents/150317_Integrity_REA_FINAL_REPORT.pdf and *The role of leadership in promoting ethical police behaviour*, College of Policing, 2015. Available at:

http://whatworks.college.police.uk/Research/Documents/150317_Ethical_leadership_FINAL_REPORT.pdf and *Literature review – Police integrity and corruption*, HMIC, January 2015. Available at: www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/

for East Midlands forces', which covers dietary advice, fitness and other health-related matters. It is working to improve measures to support mental health.

Nottinghamshire Police is not able to demonstrate whether its performance assessment process is fair or effective. From April 2016 it became an online 'self-service' procedure and the force had provided no guidance or support for supervisors on how to manage the new process, apart from a link to a guidance document on the intranet. The force is not able to measure the outcomes of its performance assessment process, apart from when people are referred for unsatisfactory performance. The workforce do not value the PDR process and do not believe that it is fair or effective.

Recommendation

HMIC has not identified any causes of concern and has therefore made no specific recommendations.

Areas for improvement

- The force should improve how it demonstrates that it has taken action to improve how it treats all the people it serves.
- The force should ensure the business interest and notifiable association policies are current, effectively communicated to staff and properly managed.
- The force should improve how it communicates the action it has taken in response to issues identified by the workforce.
- The force should ensure staff receive their annual leave entitlement and that they take the rest days owed to them, to support their health and wellbeing.
- The force should improve how it manages individual performance .

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 drives 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

Treating people with fairness and respect is well established within the vision and values of the force. The chief officer team continues to communicate the need for an ethical culture in a number of different ways. The main method is through the force’s shared values, commonly known as the ‘PROUD’ values. This acronym stands for professional; respect for all; one team; utmost integrity, trust and honesty; and ‘doing it differently’. These values are sufficiently aligned to and consistent with the College of Policing’s Code of Ethics.

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.*

When the Code of Ethics was first launched in April 2014, some officers and staff volunteered to promote it among their colleagues, and the workforce are still encouraged to bring any ethical dilemmas to the force's standards, integrity and ethics board. This group meets regularly and is chaired by the deputy chief constable. Trends in complaints from members of the public are also assessed during these meetings. Information on complaints and outcomes from the ethical dilemma discussions are posted on the force's intranet.

Workforce awareness of the Code of Ethics has since been reinforced by a video produced by the College of Policing, clear information on the use of PROUD values on the force's intranet and updated policies and practices. The force encourages its workforce, including volunteers, to use the National Decision Model (NDM), which is the framework by which all policing decisions should be made, examined and challenged. However, we found that some officers and staff are still unable to describe clearly that the code is at the heart of the NDM. The force promotes to its workforce both the PROUD values and the Code of Ethics, but the code is not as well known among its workforce.

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

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

Seeking feedback and challenge

The force seeks feedback and challenge from many of the people it serves, and is developing ways of communicating with those identified as having less trust and confidence in the police and those less likely to complain. For example, it conducts a survey of those who have made complaints, to better understand how it can improve its complaints process. The independent advisory group (IAG) provides scrutiny and advice to the force and there is also a proactive stop and search scrutiny board. Both groups include members of the black, Asian and minority ethnic community (BAME) and young people are also invited to share their views.

The force website is easily accessible to those people whose first language is not English, because it can display text in over 150 different languages. This function is easily accessible on the front page. The force works with the Physical Disability Action Group to make improvements, for example different colour contrasts on the

website, publications to assist people with dyslexia and a system to help callers who are deaf. The force makes good use of social media such as Twitter and Facebook, to interact with the public and seek feedback.

The professional standards department (PSD) investigates complaints and invites feedback on how complaints have been handled. It proactively seeks comments from the public through the media and force website to help understand which issues are affecting the public. Following high-profile cases the department has also talked to sex worker and domestic abuse support agencies to reassure them about police behaviour and to encourage them to provide further comment and information.

Victim surveys are carried out on a monthly basis and include those who have suffered domestic abuse, hate crime or burglary. All feedback is provided to officers and staff who had contact with that victim and feedback from the incident is used to improve individual performance. Force analysis has found a drop in satisfaction rates for crimes that are now investigated over the telephone rather than being attended by an officer. Improvements used by other forces that have a similar non-attendance policy are being introduced to increase satisfaction.

Identifying and understanding the issues

The force has good arrangements in place to understand the issues that have the greatest impact on public perceptions of fair and respectful treatment. For example, after the fatal stabbing of an Asian man in Nottingham, the chair of the IAG, city councillors and relevant contacts within the Asian community worked closely with the community cohesion team to provide reassurance and gather information. A week after the incident, this information indicated tensions in the community had risen and after consulting several members of the community, a section 60 search was authorised.⁷ The force website was used to update the public on police actions and as a result of feedback, the force changed its 'frequently asked questions' page so that the questions followed the timeline of the event and its after effects. Overall, the community was very supportive of the use of section 60, recognising that the force needed to be proactive in order to reduce tensions and prevent reprisals. However, the force is sometimes limited by a lack of resources and a broad range of data (including partner agency data), to fully understand some issues, for example, those relating to hate crime. There are co-located officers and a hate crime manager, working with community cohesion teams to build a better understanding of the problems in those communities in force areas with a highly diverse ethnic profile.

⁷ Section 60 stop and search powers are among the most controversial of all such powers because individual police officers can stop and search a person without needing reasonable grounds for suspicion (but the police must explain to the person that a section 60 authorisation is in place). This can lead to a large number of searches and lead to tensions between the community and police.

If any officers or staff are dismissed for gross misconduct, the force issues press releases to explain the reasons why. If a specific group has been victimised through the behaviour of any officer(s), the force communicates proactively with that group. For example, when local women had been sexually harassed by an officer, the force spoke to local women's groups once the matter was resolved, to reassure them that appropriate action had been taken and the officer had been dismissed.

The force has an independent custody visitors' scheme which is run by the police and crime commissioner's (PCC's) office. Visitors make unannounced visits to custody suites, to speak to detained people about how they are being treated and the conditions in which they are being detained. They report that most issues raised are resolved quickly and that the quality of care provided is good.

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

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

Making improvements

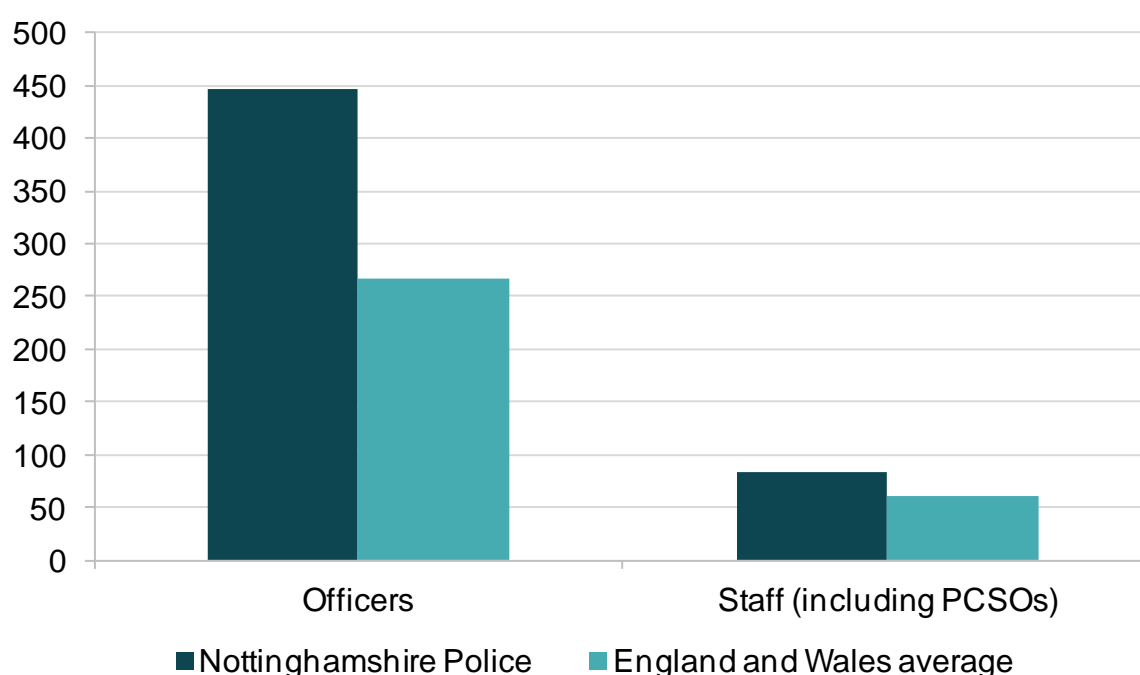
The force acts on recommendations and findings from audits, enquiries and inspections in a systematic way. Recommendations come from a number of sources, for example, following an Independent Police Complaints Commission investigation or an inspection by HMIC. These are logged in an action tracker and specific people are assigned to each action. An agreement to meet a recommendation is recorded and the person assigned to the action provides regular updates until improvements have been made or the desired outcomes are achieved. The action is only marked as completed once the deputy chief constable is satisfied that all outcomes have been met.

The PSD produces a regular newsletter called Integrity matters, which is widely read by the workforce and is used by many supervisors as a briefing document to discuss issues in an honest and open way. In addition, there is an early intervention trigger to identify cases where management intervention may be required. For example, if an officer receives four complaints in a 12-month period, they will be assessed for any recurring themes in their behaviour and if necessary, will receive management advice about their complaint history and emerging trends in behaviour.

The force's communications team has also revised the receipt given to members of the public who have been the subject of a stop and search. The new receipt improves how the force gathers feedback and helps it conduct a better analysis of complaints.

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

Figure 1: Number of public complaint cases recorded against officers (per 1,000 officers) or staff (per 1,000 staff, including police community support officers) in Nottinghamshire 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, Nottinghamshire Police recorded 447 public complaint cases per 1,000 officers, which was higher than the England and Wales average of 268 cases per 1,000 officers. During this period, the force recorded 83 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 Nottinghamshire Police are 'other neglect or failure in duty' and 'incivility, impoliteness and intolerance'. It is important to note, however, an issue

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 professional standards, integrity and ethics board thoroughly analyses complaints to identify trends in complaint type. For lower level complaints, the force speaks with the individual at the earliest opportunity in order that it can take action to resolve the situation.

There is good communication between the head of the PSD and other heads of departments, who discuss trends and emerging themes. However, the results of these discussions are not always communicated throughout the organisation, and some managers reported that they could not always share this information with their teams.

Demonstrating effectiveness

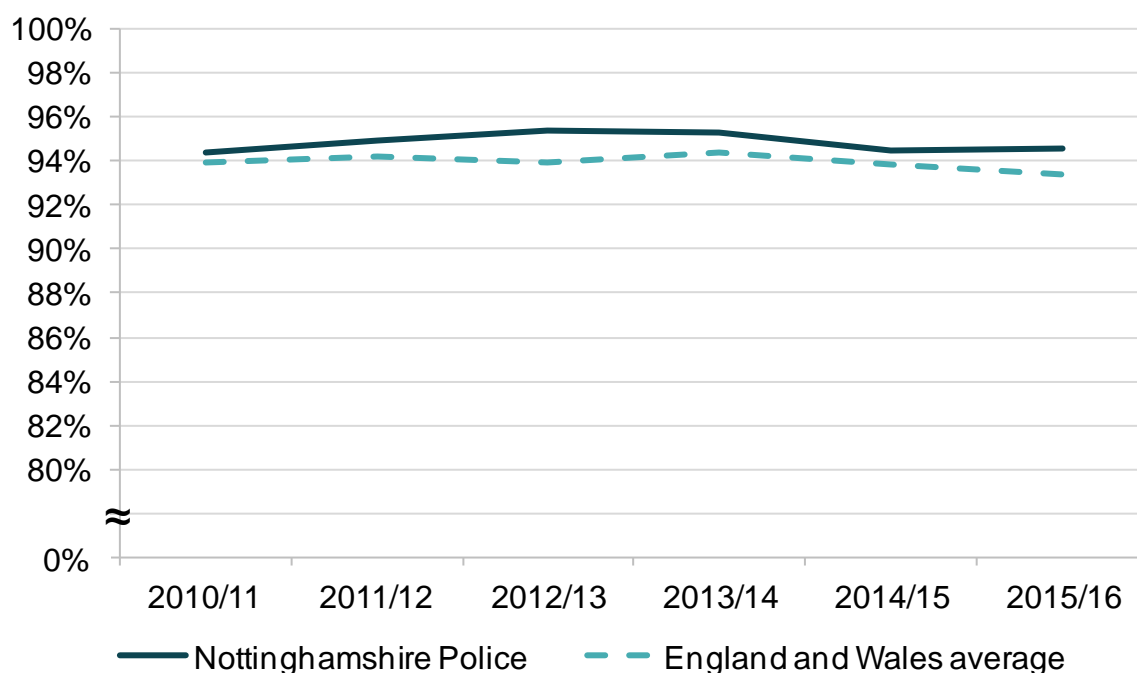
The force acts on learning and feedback but it does not always demonstrate clearly what action it has taken to improve the way it treats all the people it serves, including those who have less trust and confidence in the police.

The force engages with the public using a wide range of methods and has a small public engagement team that monitors the use of social media and maps current and emerging platforms used by communities across the force area. There is an online priority survey so that the public can share their local priorities, but these focus more on crime than how people would like to be treated.

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.

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

Figure 2: Percentage of victims satisfied with overall treatment by Nottinghamshire 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, 94.6 percent of all victims of crime (excluding hate crime) who responded to the victim satisfaction survey were satisfied with the overall treatment provided by Nottinghamshire Police, which was broadly in line with the England and Wales average of 93.4 percent; and higher than the 94.5 percent who were satisfied with the overall treatment that the force provided in the 12 months to 31 March 2015, this is not a statistically significant difference.

The force's engagement team uses the results from the PCC's twice-yearly surveys to understand which issues have the greatest effect on public perceptions of fair and respectful treatment. As a result of recent feedback, the communications team is now developing a media plan to explain to the public how the force will improve its response times to priority calls.

Summary of findings



Good

Nottinghamshire Police continues to reinforce the importance of treating people with fairness and respect through its PROUD values. The workforce understands the importance of treating people fairly and with respect and the force regularly seeks feedback on people's perceptions of fair and respectful treatment. The force engages with those who have less confidence in the police to increase their understanding of its commitment to fair and respectful treatment, particularly those who are fearful of the police. It also encourages the public to make complaints in order to improve its service. The force analyses complaints comprehensively, but this analysis is not always shared as widely as possible with managers and supervisors so that the organisation can act on this information. The force does not always show clearly what action it has taken to improve the way it treats people.

Area for improvement

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

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

In 2014, HMIC inspected the extent to which the police were acting with integrity and guarding against corruption.⁹ 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.¹⁰

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.¹¹

Once recruited, one of the best ways to prevent corruption from occurring among the workforce is by establishing an ethical working environment or culture. To achieve this, forces need to clarify and continue to reinforce and exemplify acceptable and unacceptable standards of behaviour, including the Code of Ethics.¹² This year, HMIC focused on assessing progress in those areas highlighted for improvement in our 2015 legitimacy inspection and our 2014 integrity and corruption inspection.

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

¹⁰ *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

¹¹ *College of Policing: Authorised Professional Practice on vetting*. Available at:
www.app.college.police.uk/app-content/professional-standards/vetting/

¹² *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

In HMIC's 2014 police integrity and corruption inspection, vetting arrangements within Nottinghamshire Police complied with the national police vetting policy. In 2016, the force has selected certain posts as requiring specific levels of vetting. However, due to structural changes in departments and a new shared service function introduced in April 2015, the force cannot be sure that all staff in those designated posts are vetted to the correct level. It is however currently undertaking research to ensure that the people in those posts have the right level of vetting.

The force vetting unit works in accordance with the national guidelines. Any applications that fail are inspected within the unit to see if any changes to where they live or who they associate with would affect the decision, or whether any control measures in place. .

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

The force constantly seeks to reinforce what it considers acceptable and unacceptable standards of behaviour. The force intranet contains very good reference material, and the Integrity matters newsletter provides real-life examples linked to the Code of Ethics. Officers and staff, including volunteers, have a good understanding of these standards. Governance and accountability is monitored through the quarterly professional standards, integrity and ethics board, chaired by the deputy chief constable.

Staff and officers are aware of the gifts and hospitality register and notifiable associations procedure. The force also keeps a corporate media register which records meetings with the media. HMIC's 2015 police integrity and corruption inspection report included a recommendation that the force ensures any secondary employment or business interest application which had been declined or withdrawn is followed up, to ensure compliance. The force has decided not to identify whether officers or staff whose business interest application was declined continued to engage in the activity. Instead, it relies on local managers to identify where this might be taking place and alert the professional standards department. As a consequence, staff members may be carrying on a business interest even though the force has declined permission for them to do so.

While the force generally investigates complaints swiftly and provides regular updates on progress, some officers and staff nevertheless still have a negative perception of the PSD. They perceive that it takes too long to investigate a complaint and does not provide regular updates on progress. However, these perceptions are changing. Staff we spoke with are confident about using the anonymous reporting line and about challenging poor behaviour. Regardless of how the department is perceived, the workforce has a strong desire to maintain an ethical culture in the organisation.

The communications team works closely with human resources (HR) and the PSD to review issues of behaviour and complaints against officers and staff. It produces DVDs which highlight lessons learned from cases. For example, lessons learned from a case where an officer abused their authority for sexual gain was used to create a DVD called 'It started with a kiss', which was shown to every officer in the force.

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.¹³ 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

The force uses the National Crime Agency (NCA) risk assessment process to identify areas of risk and has a force control strategy for anti-corruption. The force assesses any emerging issues and trends together with intelligence from a range of sources. It proactively and effectively identifies and manages the threat, risk and

¹³ *Integrity matters*, HMIC, January 2015. Available from: www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/

harm from corruption. Although the force performs analytical work and sets priorities as part of an annual threat assessment, it has not updated its actions since September 2015.

The force collaborates regionally by providing staff to the East Midlands Special Operations Unit (EMSOU). HMIC's 2015 police integrity and corruption inspection report recommended that the force work with EMSOU to ensure that there are proactive counter-corruption processes for all staff posted to the joint unit. This work has now been completed by Derbyshire Constabulary on behalf of the five forces in the region, and arrangements are reported as effective.

The force identifies early warning signs of potential risks to integrity and corruption through sharing information between internal departments and with other forces. For example, the PSD and HR department share information in order to identify and manage potential risks to the integrity of staff and the force. An early intervention programme is triggered by a number of complaints in a 12-month period and has a graded response. Depending on the severity of complaint, the level and type of intervention is categorised and the force monitors the success of the interventions within the professional standards, integrity and ethics meeting. This means that the force can be confident that its preventative action is evaluated to maximise its impact.

The force uses several ways to monitor and audit digital information systems, and the communications team monitors local and national press in case of leaks from within the organisation so that an investigation can take place. A new shared-service system, which started in April 2015, can run reports that cross-reference duty rotas, sickness, overtime payments and business interests.

Nottinghamshire Police does not always identify the risks associated with business interests and notifiable associations or other changes in personal circumstances, such as points accumulated on driving licences. While the workforce understands how to make an initial notification to the force of a business interest or notifiable association, an integrity health check form, which should be completed annually at the same time as the performance development review (PDR), is not working as effectively. Some departments do perform well, but the force does not ensure the PDR process is used strictly and therefore the health check form is not completed consistently. This means the force cannot be sure it is able to monitor or understand potential risks to the integrity of the organisation.

Intervening early to manage risks to integrity

The force has effective prevention and early intervention mechanisms in place to manage risks to integrity but its on-going annual review processes are not monitored well.

Officers and staff are encouraged to admit mistakes and are supported when they do so, which gives the force an opportunity to intervene early before the behaviour reaches a serious level of misconduct or corruption. Clear information on the force intranet and the Integrity matters newsletter, use real-life examples to illustrate what the force considers to be corruption. The chief officer team uses the senior leadership conference to explain ethical role model examples and these are reinforced through online chats where the workforce can ask questions of senior officers. The questions and answers are published on the force intranet.

Business interests and notifiable associations are initially controlled and monitored well. When business interests and notifiable associations are identified, a risk assessment is carried out and a control measure applied. The extent of the control measure depends on the level of threat and risk linked to the association. Changes to business interests and notifiable associations are managed through the annual integrity health check form which, as already mentioned, the force does not manage robustly.

Looking for, reporting and assessing intelligence on potential corruption

In HMIC's police integrity and corruption inspection we found that the force's counter-corruption unit (CCU) had sufficient capacity and capability to conduct comprehensive and timely analysis of existing and potential threats. Staff continue to have the capacity and the capability to use a full range of covert investigation and intelligence gathering techniques. Staff are trained and accredited in the essential elements of counter-corruption and surveillance specialities.

The force regularly and proactively gathers actionable intelligence on corruption. Intelligence gathered or received is analysed, graded and developed appropriately by analysts within the CCU before being allocated for further investigation. The force has sufficient resources for dealing with the flow of intelligence and the proactive work the CCU does to gather evidence can sometimes result in further analysis and investigation being required. The force undertakes random and intelligence-led drug testing

The CCU has access to specialist staff when required. The force identifies and prioritises these requirements through a tasking and coordination process, with support from the NCA. The force is also part of the established EMSOU and therefore has access to a variety of other resources, including those for covert operations. A recent investigation resulted in three officers being charged with serious criminal offences; they are all currently suspended from duty and awaiting trial.

The force has effective internal systems for submitting anonymous information about corruption and other areas of concern, but these are not independent of the force. Members of the workforce or the public could report wrongdoing through Crimestoppers. The Crimestoppers programme enables anonymous reporting of

information about corruption. Most of the staff we spoke to however are comfortable and feel supported when they report wrongdoing through the force's anonymous system.

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*.¹⁴ This report states that “the abuse of police powers for purposes of sexual exploitation, or even violence, is something that fundamentally betrays the trust that communities and individuals place in the police. It therefore has a serious impact on the public's confidence in individual officers and the service in general.” The report identified this behaviour as a form of serious corruption that forces should refer to the IPCC for its consideration of how it should be investigated.

The *Code of Ethics*¹⁵ – 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.¹⁶ HMIC's 2015 report *Integrity matters*¹⁷ 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

¹⁴ *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

¹⁵ 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

¹⁶ 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.

¹⁷ *Integrity matters*, HMIC, January 2015. Available from: www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/

that we inspect forces' response to the issue of officers and staff developing inappropriate relationships with victims of domestic abuse and abusing their position of power to exploit victims.

Recognising abuse of authority for sexual gain as serious corruption

The force recognises abuse of authority for sexual gain as serious corruption and it is identified as a threat in the anti-corruption strategic assessment and control strategy. The force prosecutes any officers or staff in court and staff are clear that this type of behaviour is unacceptable.

The force has also pursued a case against a police community support officer (PCSO) to take back their pension. This is the first case of its kind, being against a staff member rather than a police officer. The PCSO was dismissed from the force and charged and convicted of serious sexual offences. The decision to take back the pension has been made by the Secretary of State at the Department for Communities and Local Government.

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

The force has a confidential reporting line to the professional standards department. Staff told us that they felt comfortable both using the reporting line and reporting this type of corruption to their line manager. They also said that they had confidence in the organisation to deal with these issues robustly. The number of cases of this nature has reduced; staff said that this was due to increased awareness of the issue.

Taking action to prevent abuse of authority for sexual gain

In one high profile case, an officer abused their position for sexual gain with victims of domestic abuse. The force dealt with the crime and identified the lessons learned to educate the rest of the workforce. It produced an informative educational video, called 'It started with a kiss' which the whole workforce watched. New recruits, including volunteers, now receive training and the force runs team briefings to understand this issue and raise awareness. Staff said that they would readily report any suspicious behaviour they witnessed. Nottinghamshire Police includes such cases in its internal newsletter 'Integrity matters', and provides refresher training for first line supervisors.

Supervisors are clear about their responsibilities and the importance of police integrity to public confidence, although they are sometimes unclear on what signs to look for. A 'professional boundaries' document is part of the annual health check form and it explains what is acceptable and unacceptable behaviour when dealing with victims and witnesses. This is a good document, which sets out the force's expectations but it is not read widely because it is part of the annual integrity health-check form which is not always completed.

Building public trust

The force publishes accessible and up to date complaint and gross misconduct investigation outcomes on its website, including information on how the public can attend upcoming misconduct hearings. It works to rebuild trust with communities following high profile incidents of police misconduct or corruption. For example when an officer was found guilty of sexual misconduct with a domestic abuse victim and went to prison, the force encouraged the public to report any concerns in relation to this particular case, and concerns of their own about this type of behaviour. The force's expectations of its workforce were made clear to the public through a widely broadcast interview with a chief officer. The force's communications team visited support group meetings and talked with various groups where previous experiences with police had not been taken seriously, in order to build public trust and confidence.

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

HMIC's 2014 literature review on police integrity and corruption emphasised the importance of collection and dissemination of information about misconduct to the public, on the basis that it shows police forces are taking the problem seriously, and detecting and punishing wrongdoing.¹⁸ This information also forms the basis for deterring misconduct and enhancing integrity within police forces themselves. This year, HMIC looked at how well forces engage with the public online and through police officer misconduct hearings in public, and also more widely following high profile incidents with the potential to undermine public perceptions of police integrity. We also looked at how aware the workforce is of these outcomes.

Working with the public

The force publicises misconduct hearings on its website, including information about how to attend open hearings. The force's media department is proactive in ensuring that the force is ready to publish the outcome immediately, and post it on the force's website for 28 days. It also seeks to re-build trust with specific communities that have been affected. For example, the communications team has visited support group meetings and met with various groups who have felt their previous experiences with police have not been taken seriously.

There were ten misconduct hearings for officers since May 2015 to April 2016 which is 4.8 misconduct hearings per 1,000 officers in the force. This is a higher rate of misconduct hearings than the England and Wales average. Out of ten misconduct

¹⁸ *Literature review – Police integrity and corruption*, HMIC, January 2015. Available at: www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/

hearings in that period, four were held in public; the remaining six were not held in public, which is permitted under the national regulations governing misconduct hearings.

Working with the workforce

The outcomes from gross misconduct and misconduct findings are publicised on the force's intranet and include the names of those involved. The Integrity matters newsletter, produced by the PSD, also publishes the main findings and themes of the outcomes. The force publishes lessons learned from IPCC investigations. Staff know how to report a colleague whom they suspect of inappropriate behaviour or corruption.

Summary of findings



Good

Nottinghamshire Police continues to ensure that its workforce behaves ethically and lawfully. There is an ethical culture and the workforce understands what serious corruption is and how to report it. The force clarifies and reinforces unacceptable behaviour effectively. There are gaps in its vetting processes in respect of the force's ability to assure itself that designated posts are vetted to a specific standard, but it identifies early warning signs of potential risks to integrity and corruption by sharing information internally and with other forces.

The abuse of authority for sexual gain is understood by the workforce as serious corruption and the force prosecutes any officers or staff in court. There are good prevention and early intervention mechanisms in place for potential corruption and for ensuring the effective security of its systems. However, the annual integrity health check form is poorly understood and poorly completed, which means the force cannot be sure it is able to monitor or understand risks to the integrity of the organisation.

The force decided not to progress the recommendation we made in 2014 on ensuring compliance with declined applications for secondary employment or business interests. However, it is now working more effectively to ensure there are proactive counter-corruption processes in respect of all staff posted to the EMSOU.

Area for improvement

- The force should ensure the business interest and notifiable association policies are current, effectively communicated to staff and properly managed.

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.¹⁹ 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.²⁰ 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

Nottinghamshire Police has a good understanding of workforce perceptions and a range of feedback options are available to staff. This includes a people survey (through the University of Durham Business School) conducted in July 2015 which the force told HMIC received a 31 percent response rate. The survey showed that

¹⁹ *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

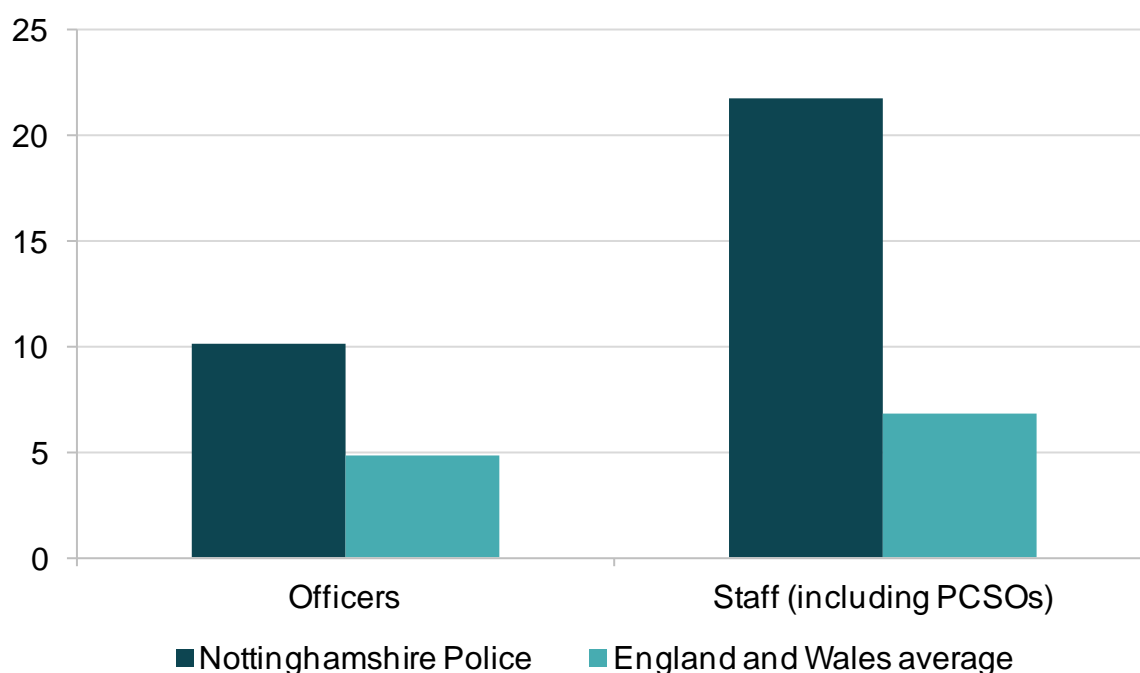
²⁰ *Fair cop 2: Organisational justice, behaviour and ethical policing*, College of Policing, 2015, page 11. Available at:

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

there are several positive areas, including a strong emotional attachment to the organisation among staff, but there are also areas for improvement. The force recognised the need to obtain feedback from members of the workforce who did not complete the survey. Managers therefore spoke to a further 100 staff throughout the organisation to gain a better insight into some of the main issues and concerns. The force found that people feel there are fewer opportunities for development and progression, and that there is a lack of fairness in the organisation. The force also uses other methods for understanding workforce perceptions, including the people board, a force suggestion scheme, exit interviews for staff who are leaving because of retirement or resignation, meetings with unions, police federation, staff associations, and staff networks. In addition, the force conducts interview sessions with under-represented groups to better understand their views.

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 Nottinghamshire 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, Nottinghamshire Police finalised 10.1 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

21.7 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).

The force actively monitors workforce diversity, complaints, misconduct and grievances. There are above average numbers of grievances for both officers and staff. One reason is due to a force re-structure. A high proportion of officers and staff are re-locating and some staff are being made redundant. These are complex matters and we found that staff sometimes feel grievances are not dealt with effectively, with no action taken or no formal response provided. Less complex grievances are more likely to be dealt with well at a local level.

Making improvements and demonstrating effectiveness

Having been through a long period of organisational change, the force seeks input from staff to understand areas of concern, including those that affect workforce perceptions of fair and respectful treatment. However, although the results of the staff survey are shared at the senior leadership conference and publicised on the force's intranet, staff we spoke to had a limited understanding and awareness of the results. Moreover, many are sceptical about any action being taken and do not see that actions arising from the people board address those issues highlighted in the staff survey. For instance, the force installed a cash machine to make it simpler for its workforce to withdraw money or make deposits; but staff indicated that there were more important issues for the force to address.

The force also conducted a work and wellbeing survey in February 2014 with the University of Nottingham, where focus groups looked at the most important issues in more detail. Following the survey, 15 recommendations were made, but neither the head of human resources nor any of the workforce we spoke with, knew about the outcomes from the recommendations.

The force recognises it has a higher number of officers in temporary rank positions than it would wish, and is working to reduce this number before a new organisational structure is put in place. The force has developed a fairer and more transparent policy for appointing temporary staff, but it is still not in use, which means some officers have been in temporary posts for a considerable time - in some instances over three years. Staff still believe that access to opportunities is limited, especially among police staff who perceive that only officers have been appointed to project roles in corporate services.

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

HMIC's 2015 PEEL legitimacy inspection found that the force had established a good range of practices to support the wellbeing of staff. The majority of staff we spoke to felt supported during periods of illness or when, for example, they needed to care for a family member. The force has some proactive measures in place to support staff, in relation to debt-related issues for example, and staff requiring support after a traumatic experience. Managers place a high importance on staff welfare.

The force aims to improve awareness, recognition and understanding of mental health issues within the workforce. It does not have a wellbeing lead or a wellbeing plan, but anticipates that a plan will be developed in 2016 across the tri-force collaboration with Northamptonshire and Leicestershire police forces. Once the plan has been developed, the force will implement the 'Workplace Wellbeing charter'. In the meantime it has a number of wellbeing initiatives and achieved a place in the top 100 companies in the 2016 Stonewall Workplace Equality Index. It also helped organise and contribute to a local conference called 'Who are We?: Exploring and Celebrating Trans Identities', which aimed to broaden delegates' understanding and awareness of the range of trans identities.

Supervisors understand their responsibilities for staff wellbeing, although some see this more as a welfare role than a holistic approach to wellbeing. The force demonstrates limited understanding of how to identify the early warning signs of mental ill health as part of prevention. For example, officers and staff dealing with intensive, sensitive cases of domestic or child abuse do not have managers who are trained to identify the early warning signs of stress. A staff member who had been off sick with workplace stress had a planned return to work arrangement, but we were informed that on their return, they found no action had been taken to manage their workload, which was reported to have worsened while they were away.

The force generally supports the wellbeing of officers who are whistleblowers and also staff being investigated for misconduct. However, many staff and officers, including staff networks, explained that investigations are often lengthy and staff

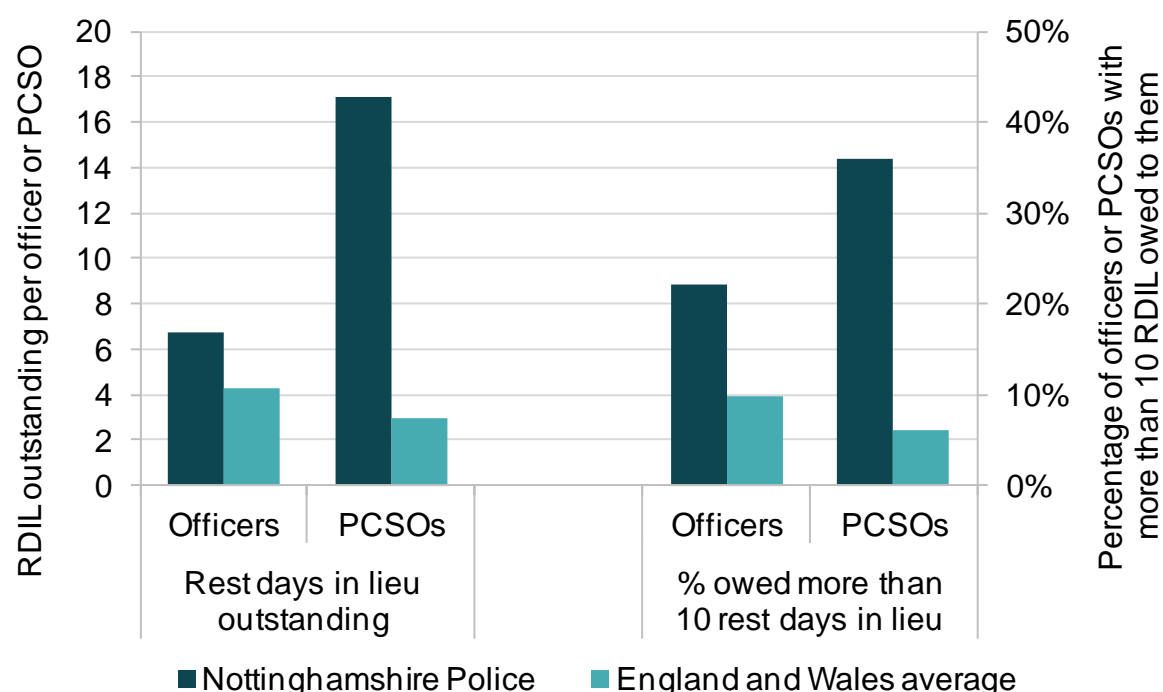
under investigation do not always receive information on progress or support to avoid unnecessary stress. The time the force takes to conclude straightforward investigations is highlighted as a particular area of concern and data provided on internal misconduct cases against officers or staff showed an increase from 51 cases in the 12 months to 31 March 2015 to 96 cases in 12 months to 31 March 2016.

The force has a policy on appointing a welfare officer to individuals who need one, although this is usually the line manager unless this is considered to be inappropriate. Guidance is provided to welfare officers but there is no specific training, for example suicide-awareness training, to prepare staff for this potentially significant role.

The force is re-organising how it provides police services and there are now fewer people in some teams. It is relocating officers and staff to other stations and some police staff are being made redundant. The control room, neighbourhood and response functions now consist of smaller teams and are also under-staffed because of abstractions to support planned events, long-term sickness and the force's decision not to recruit more staff. This means that staff who work in these teams find it much harder to take their leave or rest days owed and feel under-pressure and over-worked.

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

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



Source: HMIC Legitimacy data collection

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

As at 31 March 2016, there were 6.8 rest days in lieu outstanding per officer in Nottinghamshire Police, which was higher than the England and Wales average of 4.2 days per officer. On the same date, there were 17.1 rest days in lieu outstanding per PCSO in the force, which was higher than the England and Wales average of 2.9 days per PCSO. As at 31 March 2016, 22.1 percent of officers in Nottinghamshire 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, 35.9 percent of PCSOs in the force had more than 10 rest days in lieu owed to them, the England and Wales average was 6.0 percent of PCSOs. The data on PCSOs did not allow a comparison with the average.

Identifying and understanding the workforce's wellbeing needs

The force's understanding of the wellbeing needs of its workforce is generally good and is improving, although its provision is more reactive than preventative. It has some understanding of the risks and threats to the organisation in respect of wellbeing. The force analyses its management information (for example, assaults and injuries to officers and staff) to understand trends and take the appropriate action. The force has done more to understand workforce perceptions of wellbeing

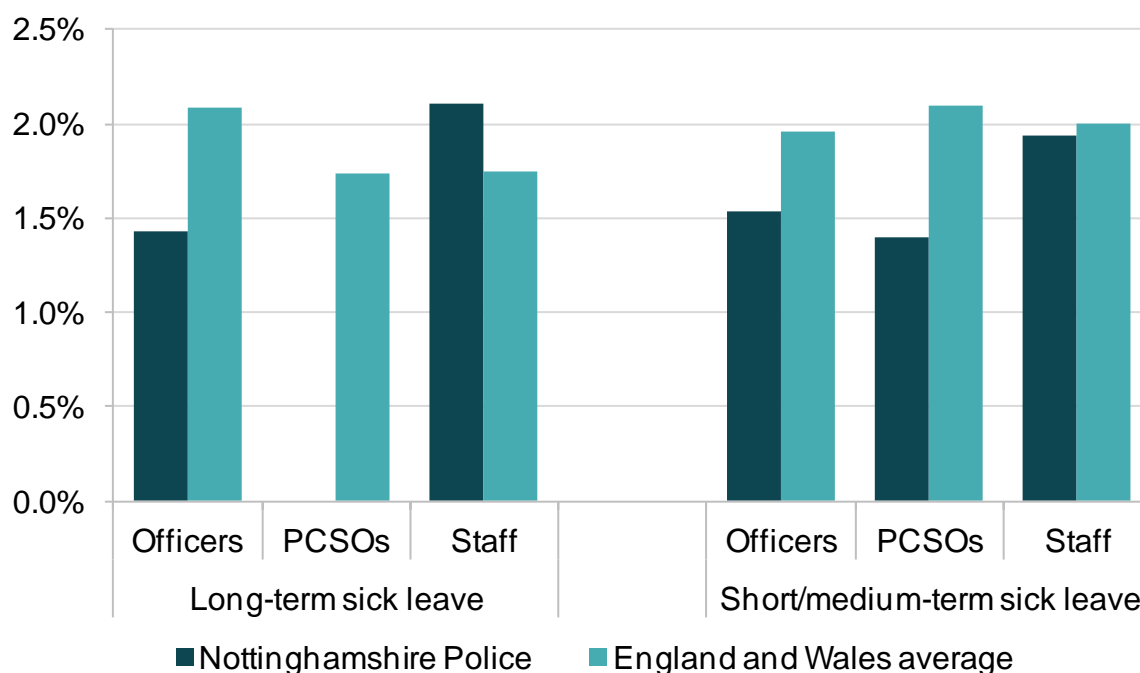
through the people survey and also encourages staff to be more open about discussing some types of illness such as mental health issues, which may have a stigma attached to them.

It is not possible to break down the referrals to occupational health by physical or psychological reasons or by staff and officers, but during the 12 months to 31 March 2016 the total number of referrals was 877. The average number of days from referral to an appointment being offered was 6.1 days.

In the contact management centre, one of the most pressurised working environments, staff told us that wellbeing is considered on a formal and informal basis and that it is generally good. There are monthly meetings where welfare and mental health issues are discussed and every six months an integrity health check form is completed which reviews changes in circumstances and any debt-related concerns. For volunteers, the chief officer in the special constabulary is responsible for the welfare of special constables but can access the wellbeing resources available to the rest of the force. This is also the case for volunteers working elsewhere in the organisation.

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

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



Source: Home Office Annual Data Requirement

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

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

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

Taking preventative and early action to improve workforce wellbeing

The force's physical environment is generally managed well, with gyms and a sports and social club as well as a website called 'Working well for East Midlands forces' which covers dietary advice, fitness and other health-related matters.

The force has taken some steps to raise staff awareness of the main threats to workforce wellbeing, and is improving the way it takes early action. The force has worked with the mental health charity MIND to embrace the blue-light pledge programme of support. However, it is still developing its overall approach to supporting good mental health to ensure supervisors recognise the early warning signs of problems and there is clear information and support. Staff spoke positively about the ability to self-refer to a counselling service.

There is inconsistency across the workforce regarding how well supported staff feel. This is partly a result of the voluntary and compulsory redundancies that are taking place, but we were also told that this is due to how supervisors and managers work with their staff, as well as individual personalities. There are several examples of staff who feel well supported at a local level, after early warning signs were identified, but there are also examples of staff who are unsure how to raise issues of wellbeing, which they believe is due to a reduction in staff who are responsible for welfare.

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.²¹ 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.²²

The performance assessment process

The force is not able to demonstrate that its performance assessment process is fair and effective. There is an annual appraisal review for each person and, unless otherwise highlighted, an assumption that each person is competent to perform their role. Many staff told us that they had not had an appraisal for a considerable period

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

²² 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

of time. There is limited force control over whether or not the review process takes place, although there are some good examples where supervisors regularly sit down with staff to discuss performance. The process has recently changed and from April 2016 it became an online 'self-service' procedure. The force had provided no guidance or support for supervisors on how to manage the new process, apart from a link to a guidance document on the intranet. The force intends that the online procedure will provide an overall rating of performance as well as monitor completion rates.

The force's lack of monitoring of PDR completions also has a wider impact in terms of monitoring business interests and notifiable associations, which should be reviewed at the time of the PDR, using the integrity health check form. Although all staff told us they know how to report business interests and notifiable associations to their supervisor, the PSD cannot be certain that it has complete oversight of the process.

The results of performance assessment

The force is not able to measure the outcomes of its performance assessment process, apart from when people are referred for unsatisfactory performance. Each person will be supported with an action plan to improve their performance, but if they are unable to change, this may lead to dismissal.

The workforce does not value the PDR process and does not believe that it is fair or effective. They are critical of the fact that it has little bearing on who is promoted. Some people in the temporary rank reported that they have had several good PDRs, but this evidence is not necessarily used in the promotion process. This limits promotions to those who perform well in the selection process, but who are not necessarily the most effective in the workplace.

Summary of findings



Requires improvement

Nottinghamshire Police can identify and has a good understanding of those issues that have the greatest impact on workforce perceptions of fair and respectful treatment. It has taken some action to address some of these concerns, but sometimes it is unclear to the workforce what these actions are. However, some issues are still perceived as being unfair, such as fair access to opportunities to develop.

The force demonstrates that it understands and values the benefits of workforce wellbeing and has plans to conduct a wellbeing assessment. The physical environment is managed well. It is working to improve measures to support mental health but there are signs that staff are overworked.

Nottinghamshire Police is not able to demonstrate whether its performance assessment process is fair or effective. It is based on an assumption that the workforce is competent and although a performance assessment is required to be completed annually, there is no monitoring of compliance. There are some good informal performance assessment practices. However, some officers and staff have not had an assessment of performance for some time.

Areas for improvement

- The force should improve how it communicates the action it has taken in response to issues identified by the workforce.
- The force should ensure staff receive their annual leave entitlement and that they take the rest days owed to them, to support their health and wellbeing.
- The force should improve how it manages individual performance.

Next steps

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

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

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

Annex A – About the data

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

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

Methodology

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

Comparisons with England and Wales average figures

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

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

Statistical significance

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

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

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

Population

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

Force in numbers

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

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

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

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

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

Figures throughout the report

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

The Independent Police Complaints Commission (IPCC) defines a complaint for the purposes of recording as "an expression of dissatisfaction by a member of the public with the service they have received from a police force. It may be about the conduct of one or more persons serving with the police and/or about the direction and control of a police force". A police complaint can be about more than one officer or member of staff and can refer to one or more allegations.²³

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

²³ *Guidance on the recording of complaints under the Police Reform Act 2002*, Independent Police Complaints Commission. Available at: www.ipcc.gov.uk/sites/default/files/Documents/statutoryguidance/guidance_on_recording_of_complaints_under_PRA_2002.pdf

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

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

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

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

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

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

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

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

Rest days in lieu are leave days owed to officers or police community support officers when they have been required to work on their scheduled rest day due to operational reasons. Data used in figure 4 were provided to HMIC by individual forces via a bespoke data collection in April 2016 prior to inspection.

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

Long-term sickness is defined as an absence due to sickness that has lasted for more than 28 days as at 31 March 2016. Data used in figure 5 were obtained from Home Office annual data returns 501 and 551. Data on long-term absences can be found in the Home Office police workforce open data tables:

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