Enquiries to: Mrs J Head
Telephone: 01768 217734

Our reference: JH/EIP

Date: 27 April 2023

AGENDA

TO: THE MEMBERS OF THE ETHCS AND INTEGRITY PANEL

CUMBRIA POLICE & CRIME COMMISSIONER AND CUMBRIA CONSTABULARY ETHICS AND INTEGRITY PANEL

A Meeting of the Ethics and Integrity Panel will take place on **Thursday 4 May 2023** at **2.00 pm** in **Conference Room 2,** Police Headquarters, Carleton Hall, Penrith**.**

G Shearer
Deputy Chief Executive

Note: Members are advised that allocated car parking for the meeting is available in the Visitors Car Park to the left of the main Headquarters building.

PANEL MEMBERSHIP
Mr Michael Duff
Mr Alan Rankin (Chair)
Mr Alex Rocke
Ms Jane Scattergood

AGENDA

PART 1– ITEMS TO BE CONSIDERED IN THE PRESENCE OF THE PRESS AND PUBLIC

1. **APOLOGIES FOR ABSENCE**

2. **DISCLOSURE OF PERSONAL INTERESTS**
    Members are invited to disclose any personal/prejudicial interest which they may have in any of the items on the Agenda. If the personal interest is a prejudicial interest, then the individual member should not participate in a discussion of the matter and must withdraw from the meeting room unless a dispensation has previously been obtained.

3. **URGENT BUSINESS AND EXCLUSION OF THE PRESS AND PUBLIC**
    To consider (i) any urgent items of business and (ii) whether the press and public should be excluded from the Meeting during consideration of any Agenda item where there is likely disclosure of information exempt under s.100A(4) and Part I Schedule A of the Local Government Act 1972 and the public interest in not disclosing outweighs any public interest in disclosure.

PART 2– ITEMS TO BE CONSIDERED IN THE ABSENCE OF THE PRESS AND PUBLIC

Number	Agenda Item	Allocated Time
4.	**NOTES OF THE PREVIOUS MEETING & ACTION SHEET** To confirm the restricted notes of the meeting of the Ethics and Integrity Panel held on 8 February 2023 (copy enclosed).	
5.	**DIGITAL POLICING** To receive a presentation on the work being carried out by the Constabulary to enhance digital policing skills – A/Detective Inspector Rob Ewin	10 minutes
6.	**CORPORATE UPDATE** To receive a briefing from DCC Carden and OPFCC Chief Executive Gill Shearer	10 minutes
7.	**UPDATES** To receive updates on Body Worn Video recordings and work being carried out in relation to force Vetting from *T/Chief Superintendent Bird*	5 minutes

8.	**NATIONAL POLICE RACE ACTION PLAN** A six-monthly update on progress of the action plan – *ACO Nancie Shackleton*	10 minutes
9.	**CIVIL CLAIMS** 1. To receive a report on Civil Claims to monitor any trends/issues and how learning/training has been implemented. – *to be presented by Andrew Dobson, Head of Legal Services*	10 minutes
10.	**OFFICER & STAFF UPDATE** To receive a report on the Constabulary's officer & staff establishment, recruitment and sickness/wellbeing - *to be presented by Director of Corporate Support, Stephen Kirkpatrick*	10 minutes
11.	**STAFF GRIEVANCES** (i) To receive a report on Grievances against the Constabulary identifying any trends or issues - *to be presented by Diane Johnson, HR Manager* (ii) Panel to provide feedback from their dip sample session	10 minutes
12.	**YOUNG IN-SERVICE OFFICERS** To receive a report regarding officers recruited as part of the Operation Uplift process and within their first three years of service.	10 minutes
13.	**INTEGRITY** (i) To receive a report on the work carried out within the Constabulary's Professional Standards Department, including Complaints by the Public; and Anti-Fraud & Corruption (including officer and staff misconduct) – *to be presented by Chief Inspector Hayley Wilkinson* (ii) Panel to provide feedback from their dip sample session	20 minutes

14.	**DIP SAMPLE SESSIONS**
	The Panel to provide feedback from the following dip sample sessions:
	   1. Comms Centre Calls
	   2. Stop and Search
	   3. Use of Force
		10 minutes

Peter McCall

Agenda Item 04

ETHICS AND INTEGRITY PANEL

Notes of a meeting of the Ethics and Integrity Panel held on
Wednesday 8 February 2023 in Conference Room 2, Police Headquarters, Penrith at 2.00 pm

PRESENT
Mr Michael Duff
Mr Alex Rocke
Ms Jane Scattergood

Also present:
Deputy Chief Constable Rob Carden
T/Chief Superintendent Mick Bird
Chief Inspector Hayley Wilkinson
A/Inspector Matthew Belshaw
Disclosure Manager (Kerry Carson)

OPCC Deputy Chief Executive – Gill Shearer
OPCC Governance Manager - Joanne Head

Due to the Panel Chair being unable to attend the meeting it was agreed that Mr Mike Duff would Chair in his absence.

01.   APOLOGIES FOR ABSENCE

Apologies for absence were received from Mr Alan Rankin.

02.   DISCLOSURE OF PERSONAL INTERESTS

There were no disclosures of personal interest regarding any agenda item.

03.   URGENT BUSINESS

There were no items of urgent business to be considered by the Panel.

04.   NOTES OF THE PREVIOUS MEETING

The notes of the meeting held on Thursday 3 November 2022 previously circulated with the agenda were agreed.

Agreed; that, the notes of the meeting held on 3 November 2022 were agreed.

05. CORPORATE UPDATE

The Chief Executive provided an update to the Panel on work being carried out by the Commissioner and the OPCC, particularly in relation to 2023/24 budgets, Council Tax Precept decisions and Fire Governance. Work was ongoing regarding the transition of Fire and Rescue Service Governance to the Commissioner from 1 April 2023.

DCC Carden briefed the Panel on work being carried out by the Constabulary. The alignment with the Local Government Reform programme (LGR) had taken place and work was being carried out with partners to co-inside with the unitary changes being implemented from 1 April 2023. A new neighbourhood policing model which allowed officers to patrol in dedicated areas but have the ability to flex and change when demand allowed had also been introduced; along with a new shift pattern which were working well. Changes to how crimes were allocated allowed specialist officers to deal with crimes allowing neighbourhood crimes to be dealt with by neighbourhood officers.

The national Single Online Home portal was being developed which would see updates from social media being included. This would also provide a portal for individuals to make firearms licensing applications from early March. Applications could be made digitally and from May this would be done directly to the new case management system. The backlog of applications was starting to reduce due to weekend working and overtime for trained staff. Monthly figures were being provided to the Home Office. Additional resources had been required to ensure a sustainable model going forward which was fit for purpose and would meet future demands.

Operation Uplift was continuing until the end of March 2023 where it was envisaged that the Constabulary would meet and potentially exceed its target. This would enable the Constabulary to retain the funding, but account for retirements and leavers within the next 18 months. However, with an increased establishment savings and efficiencies would be a challenge going forward.

DCC Carden advised the Panel of IT upgrades which were being made to Apps used by officers, especially regarding Use of Force incidents which would increase the quality of recording ofsuch incidents.

AGREED; that, the verbal reports be noted.

06. BODY WORN VIDEO

During their last Use of Force and Stop and Search dip sample sessions the Panel had identified that during the first 30 seconds of footage there was no sound. This was something that had been noticeable on a few occasions and they were advised that officers were told to turn on

their BWV cameras before leaving their vehicles. Often this did not occur rather they turned them on at the beginning of an interaction and was generally attributed to poor battery life. The Panel felt that the first 30 seconds often gave good context of an interaction and had asked whether or not it was an option to change from the national agreement.

T/Chief Superintendent Bird advised the Panel that when Body Worn Video was first rolled out it had been agreed nationally that the first 30 seconds would not have sound, this was to reduce any intrusion of the officers. However, as the officer had to personally activate the system they would be fully aware of when it was recording and when it was not. He advised that the Constabulary were considering following another force who had stepped away from this agreement. Work was being carried out with the local Police Federation and would be presented to the Use of Force Board for consideration. If in agreement a decision would be presented to the Operations Board for final decision.

An update on this work would be provided to the Panel's next meeting in May.

AGREED;   that,
         (i)   the report be noted; and
         (ii)   an update be provided to the Panel in May 2023.

07.   VIOLENCE AGAINST WOMEN AND GIRLS

A/Inspector Belshaw guided the Panel through a presentation which provided an update on the work and key achievements attained by the Constabulary in relation to Violence Against Women and Girls (VAWG) during the past six months.

Training was being provided to highlight unacceptable behaviours within the force, encouraging front line officers to intervene either internally or externally to the organisation. Sixty-three VAWG champions had been appointed throughout the force to address behaviours and attitudes and promote care of victims. As part of induction and new officer training, sessions on VAWG were being provided. This included inputs on the sexual predator behaviour, making them aware of the signs, the misconduct element in an attempt to reduce cases and prevent it happening both within and outside the organisation. The Constabulary wanted officers and staff to have confidence to report.

The Prevent Officer was linking in with the Professional Standards Department (PSD) who lead on this area of work. Within the new corporate governance structure was PSD board. It enabled organisational intelligence to highlight issues such as the link between officers who were assaulted, the number of complaints they received and/or sickness levels.

Work had been carried out with Women's Centres and other similar organisations across the county, providing training on understanding the culture, identifying who victims could be and provide education so that they provide confidence to report. In the West a pilot scheme was developing with schools.

A scrutiny panel to review cases had been set up utilising the Victims Charitable Trust. They had reviewed nine cases to look at with particular focus on the care of the victim. At the first session there had been a number of learning points identified which had been disseminated throughout the force. At a recent panel it was noted that all the points previously raised had been improved upon.

DCC Carden reported on a recent meeting he had with the Head of the Crown Prosecution Service for the region regarding the Police-CPS Joint National RASSO (Rape and Serious Sexual Offences) Action Plan. This enabled a dedicated solicitor to deal with such cases, providing early advice and therefore allowing cases to be progressed court in a timely manner. By changing the escalation process within the organisation it was hoped to reduce the timescales to within 6 months.

The Constabulary were looking to carry out another `call it out' survey to gain public perspectives. A number of internal communications were taking place and would feature a survey to obtain officer and staff feedback. Many media and press statements now contained an element regarding VAWG, illustrating that women do not have to change their lives but that men should address their behaviour.

The Panel thanked A/Inspector Belshaw for his report and offered their assistance if required in the future. Regarding future reports they asked that where statistical and trend information was available that this be included within the report.

Agreed;   that,
            (i)   the update be noted; and
            (ii)   a six-monthly update be provided to the August meeting.

(Note: A/Inspector Belshaw left the meeting at this point.)

08.   INFORMATION MANAGEMENT

(a)   CONSTABULARY INFORMATION MANAGEMENT COMPLIANCE

The Disclosure Manager presented a report which detailed the Constabulary's compliance with information management requirements. Previous reports had identified an issue with the Constabulary being able to respond to Freedom of Information and Subject Access requests within the required timescales. It was reported that there was additional staffing in the department which meant they were now managing to meet the timescales with 90% compliance.

The Panel asked whether the department would be able to sustain the current compliance rate once temporary staff contracts ended in July 2023. New staff were now becoming more skilled in dealing with requests and therefore compliance should remain at a similar level or above.

There had been a noticeable increase in the number of Subject Access Requests received with 100% compliance rate for dealing with requests within the required timescale. There had been

no identified themes or trends. With the introduction of Single Online Home and the publishing of sets of data people would be able to find their own data.

AGREED;   that, the report be noted.

(Note: Kerry Carson left the meeting at this point.)

(b)   OPCC INFORMATION MANAGEMENT COMPLIANCE

The Governance Manager guided members through the OPCC Information Management Compliance report which had been circulated to the Panel prior to the meeting. It was noted that on average half of the Freedom of Information requests received were in fact for the Constabulary to deal with.   During 2022 there had been one appeal to the Information Commissioner's Office following the outcome of an FOI request. Following review this had not been upheld and it was deemed that the OPCC had provided all the information that the individual was entitled to.

There had been an increase in the number of Subject Access Requests received in 2022, however only 1 was for the OPCC to deal with. There had been no appeals made to the Information Commissioner's Office and no data breaches had been identified.

AGREED;   that, the report be noted.

09.   INTEGRITY

Chief Inspector Wilkinson presented the quarterly report for the Professional Standards Department including public complaints, misconduct and anti-corruption unit performance. She advised that work was ongoing to streamline and standardise the complaint handling process. Ethnicity data was being not always captured due to the many different reporting methods. A performance indicator had been given to the service recovery handlers to have them ask complainants about their ethnicity to enable the data to be captured.

The Centurion case management system was due to be reconfigured on 2 March which would enable the department to identify complaints for those officers on front line patrol who were also young in service.   This should appear within the next quarters figures.   A `Safe to Say' campaign had been introduced to enable young in service officers raise work issues, ask for support and guidance and identify any financial difficulties.   Internal communications had also been circulated in December 2022 on the requirement to notify the organisation of associations. DCC Carden advised that a change to the performance review structure would see a link with performance, wellbeing, associations and vetting.   All departments were carrying out Strategic Risk Assessments (STRA) and T/Chief Superintendent Bird advised that a summary of the PSD STRA would be provided for the next panel meeting.

At the November meeting the Panel had feedback on a complaint and review cases they had reviewed as part of their dip sample process. A number of questions had been raised and Chief Inspector Wilkinson provided an update in response to those.   It was agreed that a further response should be sent to the complainant following the outcome of further investigations; the OPCC would agree with the Constabulary who would be best placed to provide it.

The Panel reiterated the importance of independent complaint reviews being carried out in an open and transparent manner. Where a review was upheld it was important that the Constabulary acknowledged and accepted the recommendations in order to review the case again; carrying out any proposals and work thereby giving the complainant assurance that the matter was dealt with appropriately.

AGREED;   that,
- (i)   the report be noted;
- (iii)   a summary of the PSD STRA process be provided for the next meeting; and
- (iv)   a letter be sent to the complainant of the identified case to advise them of the further investigation outcome and police actions.

(b)   Vetting Dip Sample

Prior to the meeting the Panel had carried out a dip sample of the Constabulary's vetting decisions. They had reviewed 12 cases and were in agreement with 11 out of the 12 decisions.

One of the decisions related to a serving officer within another force. The Panel asked what the process would be to ensure that the relevant force were notified of the transfer application being declined. DCC Carden assured the members that the Constabulary would be speaking directly with the relevant PSD to ensure that they were aware of the issues.

T/Chief Superintendent Bird briefed the Panel on changes being made within the Constabulary and also on a national level. The frequency of vetting would be increased and the College of Policing were looking to replace the Authorised Professional Practice (APP) guidance with a Code of Practice. This would ensure that all forces met the minimum standards and processes were clear.   Plans had been developed should additional resources be required within PSD to meet requirements.   Where an officer was promoted or changed roles they would now be vetted before taking up that position.

It was agreed that the Panel would review vetting decisions again in six months' time prior to their August meeting.

AGREED;   that, the
- (i)   feedback be noted; and
- (ii)   Panel to review vetting decisions in six months' time prior to their August 2023 meeting.

10. YOUNG IN-SERVICE OFFICERS

Due to the information not being available for the meeting it was agreed that this would be deferred to the May meeting. It would also allow information up to the end of Operation Uplift to also be included within the data being provided.

AGREED;   that, the agenda item be deferred to the May meeting.

11. STOP & SEARCH AND USE OF FORCE CASE SAMPLING

Prior to the Panel meeting the members had had the opportunity to dip sample a selection of Stop and Search incidents. No issues or concerns had been identified with what they had seen and reported on the value of Body Worn Video footage.

The Panel had reviewed 3 cases where Use of Force had been used by officers. Two of the cases the Panel had no comments to make. The third case had involved the use of PAVA and use of force which the Panel questioned the need for. The Constabulary were to look into the matter, linking in with the officer's supervision and the Learning and Development Department regarding student officers.

AGREED;   that, the
(i)   dip sample feedback be received; and
(ii)   the identified case be reviewed by the Constabulary, linking in with the Learning and Development Department.

12. OPCC COMPLAINTS, REVIEWS AND QSPI'S

The OPCC Governance Manager presented two reports which outlined complaints dealt with by the OPCC and complaint reviews; and regarding areas of dissatisfaction which members of the public had contacted the Commissioner about. It also highlighted the work being carried out by the Police and Crime Commissioner and the OPCC to make a difference to the communities in Cumbria.

The OPCC had seen a continued increase in members of the public writing to the Commissioner to make a complaint regarding a police officer or staff member. As the OPCC had no statutory authority to deal with these, the individual was provided with the contact information for the Constabulary's Professional Standards Department.

From 1 January to 31 December 2022 the OPCC had received 57 complaint review requests, illustrating a 10% increase compared to the same period in 2021. On average 10% of the review requests received were upheld.

From 1 January to 31 December 2022, the number of QSPI's received by the OPCC had risen to 591, this being a 23% increase from the previous year resulting in approximately 3 per day being received.

The report identified 4 main issues raised as being – police service dissatisfaction, miscellaneous, anti-social behaviour and driving issues. The report also detailed work being carried out by the OPCC and the difference it was making in local communities. In response to a member's question, the OPCC Chief Executive advised that the Pathway programme which aims to listen to both victims and prevent offenders returning to crime had found that re-offending rates were very low. The Panel asked whether it was possible to include the outcome of success for future reports and how these are measured.

Agreed;   that,
        (i)   the reports be noted; and
        (ii)   future QSPI reports include outcomes of success and how these are measured.

13.   2022 ETHICS AND INTEGRITY PANEL ANNUAL REPORT

The Governance Manager presented a draft of the Panel's Annual Report which had been previously circulated. The report detailed the work overseen by the Panel and the thematic sessions they had carried out during 2022. It had been another very busy year, with the Panel becoming involved in new areas of work.

Members were asked to provide any further comments to the OPCC Governance Manager who would collate them and re-circulate a final draft. Once finalised the report would be presented to the Police and Crime Commissioner and also to the Joint Audit Committee.

Agreed;   that,
        (i)   the draft Annual Report be noted; and
        (ii)   members provide any comments to the OPCC Governance Manager.

Meeting ended at 4:30 pm

Signed: _____   **Date: _____**
            Panel Chair

Implementing the PRAP
- Some thoughts

ACO Shackleton

Some Thoughts

- Needs to remain focussed on Black community/employee experience
- Needs to have internal and external scrutiny
- Has a set of diagnostic indicators/ scope dashboard
- This is about people and culture - How do we ensure it is across the organisation
- How do we link it into wider transformation?
- How do we show as a team that we are discussing/implementing this
- Are we/our leaders prepared for the true cost of allyship
- Ice Breaker/priority actions = 17, all =63
- Revised actions/milestone issued w/c 10th April 2023

Recommendations (63) Priority Action Milestones (17)
Workstream 1 (internal culture & inclusivity)

- Develop officers/staff understanding of Black history &relationship with Black Community

- Adopt annual ethnicity pay gap survey

- Nationwide minimum level of support for Black officers/staff subject to racially motivated harassment/hate crime

- **Develop fair and equitable misconduct and complaints process (initial assessment to investigation, outcome), to eliminate disparity in disc process**

- NPCC/CoP – identify disproportionality for black staff in disciplinary processes and develop ant racist response

- Best practice – benefits of black staff/scrutiny panels to inform PSD initial assessment, investigation & decision making processes

Recommendations (63) Priority Action Milestones (17)
Workstream 2 (Not over policed, use of powers)

- **National approach to eliminate racial disparities at force/individual level – S163 RTA, S60, Taser, UoF**

- Identify & address disproportionality in use of Taser & force

- Develop a framework for recording vehicle stops

Recommendations (63) Priority Action Milestones (17)
Workstream 3 (community engagement & relations)

- Improve engagement in policing activity & governance – test IAG, scrutiny panels, how are Black voices heard

- NPCC/CoP to pilot examples and joint policing/community evaluation

- NPCC/CoP produce evaluated practice models, knowledge bank – accessible to police and public

Recommendations (63) Priority Action Milestones (17)
Workstream 4 (not under protected against victimisation)

- Analysis to identify which crime types have the most disproportionate impact on Black people and service level they receive (ensure equality of service)

- NPCC/PCCs – more effective public safety response to improve victim experience of hate crime & their families

- Create a national Black mentoring scheme- more effective at understanding & supporting Black people who feel marginalised

- Refresh crime prevention plans to improve the support to Black communities – introduce plans to reduce victimisation & marginalisation

Internal and External Governance

Part	Owner	Internal Gov	External Gov	Black Scrutiny/ Community involvement
WS 1 - Culture	Nancie Shackleton (Programme Board)	Confidence & Equality (CC)	Ethics & Integrity (PCC facilitated independence)	
WS 2 - Powers	Matt Kennerley *(Rachel Trehearne)*	Use of Force Board, Stop Search Board Ops Board (ACC)	SIAG	
WS 3 - Involved	Hayley Wilkinson *(Siraaaz Patel)*	PSD Board (DCC) VIG/CCMP	Ethics & Integrity (PCC facilitated independence)	
WS 4 –Protected	Lisa Hogan	Ops Board (ACC) or Performance Board (DCC)	VAWG/victim scrutiny panel?	
Our Black Workforce & ARC Cultural Audit	Nancie Shackleton (Siraaz Patel) (Programme Board)	Confidence & Equality	Ethics & Integrity	

How do we mainstream?

- This isn't a tick box action plan
- Needs changes in thinking and behaviour
- This is about people (leadership) and culture
- With all other reviews, could we change our people/culture to address other "isms" and aspire to become institutionally/systemically inclusive
- How do we inform/educate the remainder of the organisation? This is about being fair and shouldn't increase "fear of getting things wrong"
- Increasing the confidence that getting things right
- This is long term change but needs action focus
- People need to feel safe with us

Our Black workforce (Appendix A)

- Findings
- Support (openly racist public) and allyship
- Disproportionality
- How do we have open dialogue (collectively)
- How do we remain inclusive with Brown colleagues and VIG
- How do we get white colleagues to understand the additionality of race?
- How do we keep people safe/supported (inside org and in public)
- How do we replicate black/brown/VIG etc

ARC Cultural Audit (Appendix B)

- Unpopulated action plan (14 recommendations)
- Overlay to PRAP and anti racist training
- Started dialogue with B & B colleagues but needs to be wider COG

The Landscape, reporting & scrutiny

- Trust and Confidence

PRAP

Casey

VAWG

Serious Youth Violence

Victims groups

External Scrutiny (refresh)
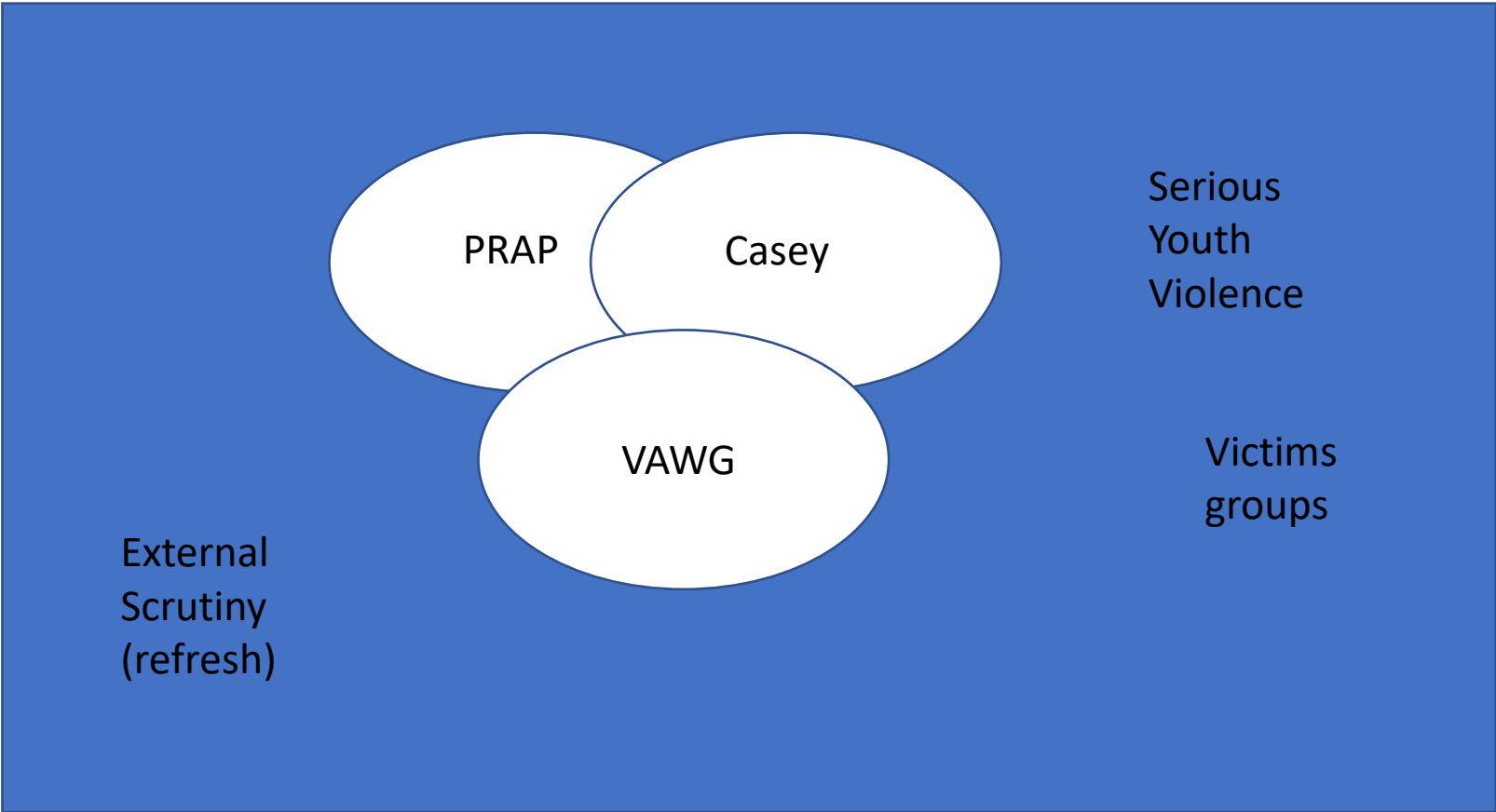
Measurement

- Scoping diagnostic dashboard

Workstream One – Represented

Outcomes into diagnostic indicators

	Represented Outcomes	Diagnostic Indicators
WS1/1	Eliminating any racial bias, sterotyping profiling or discrimination from our policies procedures and practices	Perception survey**, recruiting, retention & wellbeing data by ethnicity
WS1/2	Approaching racial disparities in the police as problems in themselves regardless of their causes because of their impact on out Black officers staff and volunteers	Internal procedural justice for example misconduct and grievance - professional standards data*
WS1/3	Making sure Black people are Encouraged and well prepared to apply for police roles	Perception survey** / career progression* / attrition rate by ethnicity
WS1/4	Making sure Black people Submit good applications	Recruitment process data* / Career progression incl timeliness & attrition / rank & representation data / ethncity pay gap*
WS1/5	Making sure Black people Are not disadvantaged in the process	Career progression incl timeliness & attrition / rank & representation data / ethncity pay gap*
WS1/6	Making sure Black people: Are assessed fairly	Career progression incl timeliness & attrition / rank & representation data / ethncity pay gap* New recruits survey**
WS1/7	Making sure Black people are: Are able to develop and progress including to the most senior levels	SCC application and success rate / Career progression incl timeliness*
WS1/8	Making sure Black people: have their individual needs met	Perception survey**, Black officers and staff assaults data
WS1/9	Making sure Black people are: listened to and have influence	Perception survey** / career progression */ attrition rate by ethnicity

Police Race Action Plan – Success Measures

Workstream One – Represented measures

Workstream one - represented - success indicators
Increase the number of Black recruits joining policing (proportion of recruits)
Increase the proportion of Black officer in the total workforce
national absence information white v black
Identify and reduce the proportion of misconduct investigations relating to black officers
Identify and reduce the proportion of grievance investigations relating to black officers
Identify and reduce any gap in promotion average time for promotion for Black officers
Increase the number of Black officers and staff attending SPNAC
internal victims — Reduce the number of Black officers/staff who are victims of assault / Reduce the number of Black internal victims of hate crime - Black officers/staff
Identify & reduce ethnicity pay gap
Perception survey results
New recruits survey findings

Workstream Two

Outcomes into diagnostic indicators

	Respected Outcomes	Diagnostic Indicators
WS2/1	Eliminating any racial bias sterotyping profiling or discrimination in our actions	Monitor compliance to national data standards for data & transparency* track proportionate use of powers: stop & search, use of force incl Taser, traffic stops by ethnicity* Arrest / RUI / outcome data monitored by ethnicity*
WS2/2	Treating black people as individuals and taking account of their needs vulnerablitites experiences and circumstances such as trauma	Track racial disparity use of powers: stop & search, use of force incl Taser, traffic stops (s.163) by ethnicity* Arrest / RUI / outcome data monitored by ethnicity* CSEW respect & fair treatment questions Monitor compliance to national data standards for data & transparency*
WS2/3	Approaching racial disparities in our actions as problems in themselves regardless of their causes because of their impact on Black people	Track racial disparity use of powers: stop & search, use of force incl Taser, traffic stops by ethnicity* - including individual officer interaction by ethnicity Arrest / RUI / outcome data monitored by ethnicity* CJ racial disparity data incl First time entrants by ethnicity Monitor compliance to national data standards for data & transparency*
WS2/4	Minimising any harms we inadvertently cause because of their differential impact on Black People	to be determined
WS2/5	Reducing the risk of criminalising Black people by ensuring they benefit from early action prevention and diversion	Out of court disposals and alternate diversionary CJ pathways* / arrest / RUI / outcome data monitored by ethnicity*

Police Race Action Plan – Workstream Success Measures

Workstream two - respected

Workstream two - respected
Monitor compliance to national data standards for data & transparency*
Reduce the disproportionate use of powers effecting Black people: use of force
Reduce the disproportionate use of powers effecting Black people: stop & search
Reduce the disproportionate use of powers effecting Black people: Taser
Identify and reduce the disproportionate use of traffic stops effecting Black people
Reduce the disproportionate arrest rates effecting Black people
Identify and reduce disproportionate decisions effecting Black people for released under investigation decisions.
Identify and reduce disproportionate outcome decisions effecting Black people
CSEW respect & fair treatment questions
Identify and reduce racial disparity data in First time entrants into the criminal justice system

Workstream three – involved

Outcomes into diagnostic indicators

	Involved Outcomes	Diagnostic Indicators
WS3/1	Apologising for the long lasting effects of problems in Policing on Black communities	CSEW public confidence by ethnicity
WS3/2	Understanding the frustrations of Black people about the slow speed of change	Commmunity engagement feedback capture*
WS3/3	Responding to community trauma and reconciling Police/Community divisions	CSEW public confidence by ethnicity / Commmunity & public engagement feedback capture*
WS3/4	Involving Black People in our oversight and scrutiny processes proactively and as a matter of course	IAG and scrutiny panel by ethnicity* / Commmunity & public engagement feedback capture*
WS3/5	Making sure Black people: Can influence our decisions at different stages in the process	IAG and scrutiny panel by ethnicity* / Commmunity & public engagement feedback capture*
WS3/6	Making sure Black people: are able to voice their opinions to which we listen and take account	IAG and scrutiny panel by ethnicity* / Commmunity & public engagement feedback capture*
WS3/7	Making sure Black people: receive timely and meaningful information about our decisions and how we reached them	Commmunity &public engagement feedback capture /Victim satisfaction by ethnicity*
WS1/9	Making sure Black people: have opportunities to review our decisions and have appropriate means of redress	Public complaints and dissatisfaction / Commmunity & public engagement feedback capture*
WS1/10	Making sure Black people: are treated with dignity and respect	Public complaints and dissatisfaction / Commmunity & public engagement feedback capture* / IAG and scrutiny panel by ethnicity*

Police Race Action Plan – Success Measures

Workstream three – involved

Workstream three – involved
Improve Black people's confidence in the police
Community engagement feedback capture* from innovation hubs
Improve Black people's confidence in their local force
Increase the involvement of Black people in Force oversight and involvement of - representation level in IAG or equivalent
Reduce the proportion of public complaints and dissatisfaction received from Black People

Outcomes into diagnostic indicators

	Protected Outcomes	Diagnostic Indicators
WS4/1	Making sure Black People are, and feel safer	CSEW public confidence & feelings of safety
WS4/2	Reducing Black victimisation, especially of hate crime and serious youth violence	Police recorded crime - Race related hate incidents and cime, violence crime rates by ethnicity by age category. CSEW - victim rates for violence and hate crime by ethnicity
WS4/3	Reducing the harms caused by the crime and disorder experienced by Black People, partcualrly by the most vulnerable	Police recorded crime - Race related hate incidents and cime, violence crime rates by ethnicity by age category. CSEW - victim rates for violence and hate crime by ethnicity
WS4/4	Treating Black victims and witnesses better, understanding their needs and vulnerablities	Home Office victim satisfaction by ethnicity*
WS4/5	Improving the quality and outcome of our investigations for Black victims	Police recorded crime outcomes by ethnicity / CJ outcomes by ethnicity
WS4/6	Taking clearer action to tackle far-right extremism and racist violence	to be determined
WS4/7	Improving how we prevent, and respond to, the crime and disorder concerns of Black communities, particularly of young people	Crime severity score, vulnerability and deprivation monitoring alongside ONS community data to identify and reduce disparity*
WS4/8	Helping Black communities to address local crime and disorder problems	Crime severity score, vulnerability and deprivation monitoring alongside ONS community data to identify and reduce disparity*
WS4/9	Actively supporting services that make a difference to Black people's lives, and reduce the need for us to be involved later on	to be determined

Police Race Action Plan – Success Measures
Workstream four - protected

Workstream four - protected
CSEW feelings of safety improved for Black people
Police recorded crime - Race related hate incidents and cime, violence crime rates by ethnicity by age category.
CSEW - victim rates for violence and hate crime by ethnicity
Home Office victim satisfaction by ethnicity*
Police recorded crime outcomes by ethnicity / CJ outcomes by ethnicity
Crime severity score, vulnerability and deprivation monitoring alongside ONS community data to identify and reduce disparity*

Agenda Item 10

Cumbria Constabulary Report to the Ethics & Integrity Panel

Subject	Officer & Staff update
Lead	Stephen Kirkpatrick, Director of Corporate Support
Date and version	19 April 2023 / V1

I. Update on the IPLDP Route

The traditional entry route to policing, known as the Initial Police Learning and Development Programme (IPLDP) was replaced by the Police Education Qualifications Framework (PEQF) in 2020.

The IPLDP programme traditionally includes around 18-20 weeks initial classroom training before moving to operational 'in company' duties and then Independent Patrol Status (IPS) within a two-year probationary period. Officers completing the programme gain a (Level 3 Diploma) qualification in Professional Policing Practice accredited by SFJ Awards.

The Police Constable Degree Apprentice (PCDA) route is the closest replacement for IPLDP and follows the same initial format but runs for a three-year period where the officer will balance operational duties alongside achievement of a (Level 6) Policing Degree. The Constabulary have successfully implemented and operated the PEQF programme since this time and have recruited across a range of entry routes including PCDA and Degree Holder programmes.

Whilst the Constabulary enjoy continued success with PEQF entry programmes, it has been recognised that the closure of the IPLDP route has placed an increased strain on forces to achieve the Police Officer Uplift programme whist managing abstraction levels due to the increased academic workloads. Additionally, it was considered that the closure of IPLDP route could potentially reduce access to a policing career for some.

Following pressure from forces, the College of Policing took the decision to temporarily reintroduce the IPLDP entry route whilst a new 'non-degree' route is developed before 31/03/24 which will be incorporated as an additional route within the PEQF framework.

Cumbria Constabulary have reintroduced IPLDP alongside the other PEQF routes with three cohorts of student officers currently in training. The first IPLDP cohort of 16 student officers joined in December 2022 with a second and third cohort of 19 and 20 student officers respectively joining in March 2023.

The reintroduced programme is progressing well with the first cohort due to complete initial training at HQ shortly. There are currently no significant retention or absence issues with the new IPLDP routes which is in-line with the other PEQF routes. Focus is being given to increasing tutor capacity to support student officers when they commence operational duties. Looking forward to the 2023/24 financial year,

the Constabulary are planning to run one PCDA cohort with the remaining intakes for the year planned as IPLDP before the replacement for IPLDP is introduced from April 2024.

II. Absences

The following graphs detail force level absences across officers and staff broken down to include and exclude Covid-19 related absences.

 The graphs are then broken into further detail by police officers and staff.

All Absences

% of Employees Absent as at Month End

Month	2018	2019	2020	2021	2022	2023
Jan		3.0%	3.4%	3.2%	4.2%	3.9%
Feb		3.9%	2.9%	3.0%	4.0%	3.4%
Mar		3.9%	4.6%	2.5%	5.3%	2.8%
Apr	3.0%	3.9%	2.7%	2.3%	2.7%	
May	2.5%	3.4%	2.4%	2.2%	3.4%	
Jun	2.4%	3.4%	2.2%	3.8%	3.5%	
Jul	2.8%	3.8%	2.4%	3.0%	4.0%	
Aug	2.8%	3.7%	2.2%	3.3%	3.4%	
Sep	3.1%	3.8%	3.3%	4.0%	4.0%	
Oct	3.6%	4.2%	2.8%	3.5%	4.0%	
Nov	3.5%	4.3%	3.4%	3.7%	4.9%	
Dec	3.9%	4.4%	3.2%	5.8%	4.7%	

Covid - 19 Absence Removed

Month	2018	2019	2020	2021	2022	2023
Jan		3.0%	3.4%	2.4%	3.1%	3.7%
Feb		3.9%	2.9%	2.7%	3.2%	3.3%
Mar		3.9%	3.2%	2.1%	3.2%	2.7%
Apr	3.0%	3.9%	2.3%	2.2%	2.3%	
May	2.5%	3.4%	2.3%	2.0%	3.2%	
Jun	2.4%	3.4%	2.1%	2.4%	2.9%	
Jul	2.8%	3.8%	2.3%	2.6%	3.8%	
Aug	2.8%	3.7%	2.1%	2.6%	3.4%	
Sep	3.1%	3.8%	3.2%	3.1%	3.8%	
Oct	3.6%	4.2%	2.7%	2.9%	3.9%	
Nov	3.5%	4.3%	3.1%	3.4%	4.7%	
Dec	3.9%	4.4%	2.5%	2.8%	4.6%	

Covid - 19 Sickness Absence

Month	2020	2021	2022	2023
Jan		0.8%	1.1%	0.2%
Feb		0.4%	0.9%	0.1%
Mar	1.4%	0.5%	2.1%	0.1%
Apr	0.4%	0.1%	0.4%	
May	0.0%	0.1%	0.2%	
Jun	0.1%	1.4%	0.6%	
Jul	0.0%	0.5%	0.2%	
Aug	0.0%	0.7%	0.0%	
Sep	0.1%	1.0%	0.2%	
Oct	0.0%	0.6%	0.1%	
Nov	0.3%	0.3%	0.2%	
Dec	0.7%	3.0%	0.1%	

Police Officer Absences only

% of Employees Absent as at Month End

Month	2018	2019	2020	2021	2022	2023
Jan		3.0%	3.3%	3.3%	4.3%	3.8%
Feb		3.7%	2.8%	3.5%	4.3%	3.1%
Mar		4.1%	4.2%	2.8%	5.1%	2.6%
Apr	2.2%	3.6%	2.8%	2.6%	2.6%	
May	2.1%	3.6%	2.4%	2.5%	3.0%	
Jun	2.2%	3.5%	2.5%	4.6%	3.0%	
Jul	3.0%	3.3%	2.9%	3.7%	4.1%	
Aug	2.9%	3.6%	2.6%	3.8%	3.2%	
Sep	3.0%	3.8%	3.5%	3.8%	4.1%	
Oct	3.4%	4.0%	2.7%	3.5%	4.3%	
Nov	3.6%	4.1%	3.2%	4.0%	5.1%	
Dec	4.1%	4.6%	3.3%	6.2%	5.0%	

Covid - 19 Absence Removed

Month	2018	2019	2020	2021	2022	2023
Jan		3.0%	3.3%	2.5%	3.1%	3.6%
Feb		3.7%	2.8%	3.3%	3.3%	3.1%
Mar		4.1%	2.9%	2.4%	3.0%	2.5%
Apr	2.2%	3.6%	2.5%	2.5%	2.2%	
May	2.1%	3.6%	2.4%	2.3%	2.8%	
Jun	2.2%	3.5%	2.5%	2.9%	2.5%	
Jul	3.0%	3.3%	2.8%	3.1%	3.9%	
Aug	2.9%	3.6%	2.5%	3.0%	3.2%	
Sep	3.0%	3.8%	3.4%	3.0%	4.1%	
Oct	3.4%	4.0%	2.6%	2.7%	4.3%	
Nov	3.6%	4.1%	3.0%	3.6%	5.0%	
Dec	4.1%	4.6%	2.2%	2.9%	4.9%	

Covid - 19 Sickness Absence

Month	2020	2021	2022	2023
Jan		0.8%	1.2%	0.1%
Feb		0.2%	1.0%	
Mar	1.3%	0.4%	2.1%	0.1%
Apr	0.3%	0.1%	0.4%	
May		0.1%	0.2%	
Jun	0.1%	1.7%	0.5%	
Jul	0.1%	0.6%	0.2%	
Aug	0.1%	0.7%		
Sep	0.1%	0.9%		
Oct	0.1%	0.8%		
Nov	0.2%	0.4%	0.1%	
Dec	1.1%	3.3%	0.1%	

Police Staff Absences Only – excluding PCSO

% of Employees Absent as at Month End

Month	2018	2019	2020	2021	2022	2023
Jan		2.9%	3.3%	2.9%	3.8%	3.8%
Feb		3.9%	2.6%	1.8%	3.7%	3.7%
Mar		3.3%	5.1%	2.2%	5.3%	2.9%
Apr	4.2%	4.1%	2.6%	1.6%	2.9%	
May	3.0%	3.0%	2.4%	1.6%	3.9%	
Jun	2.8%	3.3%	1.8%	2.5%	4.1%	
Jul	2.2%	4.5%	1.4%	2.0%	3.5%	
Aug	2.8%	3.5%	1.4%	2.4%	3.5%	
Sep	3.3%	3.7%	3.2%	4.1%	3.7%	
Oct	4.1%	4.5%	2.9%	3.5%	3.2%	
Nov	3.2%	4.2%	3.5%	3.2%	4.3%	
Dec	3.0%	3.8%	2.9%	5.5%	3.8%	

Covid - 19 Absence Removed

Month	2018	2019	2020	2021	2022	2023
Jan		2.9%	3.3%	2.1%	3.0%	3.4%
Feb		3.9%	2.6%	1.2%	3.0%	3.3%
Mar		3.3%	3.7%	1.6%	3.3%	2.8%
Apr	4.2%	4.1%	2.0%	1.4%	2.4%	
May	3.0%	3.0%	2.2%	1.4%	3.8%	
Jun	2.8%	3.3%	1.7%	1.6%	3.4%	
Jul	2.2%	4.5%	1.4%	1.7%	3.3%	
Aug	2.8%	3.5%	1.4%	1.7%	3.4%	
Sep	3.3%	3.7%	3.0%	3.2%	3.0%	
Oct	4.1%	4.5%	2.9%	3.2%	2.8%	
Nov	3.2%	4.2%	3.2%	2.9%	3.9%	
Dec	3.0%	3.8%	2.8%	2.8%	3.7%	

Covid - 19 Sickness Absence

Month	2020	2021	2022	2023
Jan		0.8%	0.8%	0.4%
Feb		0.7%	0.7%	0.4%
Mar	1.4%	0.7%	2.0%	0.1%
Apr	0.7%	0.1%	0.5%	
May	0.1%	0.1%	0.1%	
Jun	0.1%	0.9%	0.7%	
Jul		0.3%	0.3%	
Aug		0.7%	0.1%	
Sep	0.1%	0.9%	0.7%	
Oct		0.4%	0.4%	
Nov	0.4%	0.3%	0.4%	
Dec	0.1%	2.8%	0.1%	

The top 5 absence types

	Oct 22 – Mar 23	Up to Sept 22 – previous 12 months
1	Cough and Cold	Covid 19
2	Diarrhoea/Vomiting	Psychological
3	Covid 19	Miscellaneous
4	General	Cough and Cold
5	Psychological	Headaches

Highlights are below, but other work continues as business as usual such as signposting to the inclusion hub, attendance surgeries with managers, case conferences, referrals to OH (Occupational Health) etc.

- Absence has significantly decreased from December 2022 and in March 2023 was under 3%.
- 1003 absences within the Constabulary with only 16 being student officers (October 22 – March 23).
- The average length of service for all officers and staff reporting sick was 10 years.
- Specific focus is given to the top absence types where appropriate:
  - Cough and cold – Although a rise in position from the previous 12 months, some of this can be accounted for by the increased freedom of movement following Covid-19. Messages relating to the importance of hand hygiene continue to be highlighted on force intranet and in all facilities. The Constabulary has, however, provided 687 targeted flu injections during the winter of 2022 to those in key roles across the organisation. This annual programme complements the NHS winter flu vaccinations for over 50s.
  - Diarrhoea/Vomiting – No specific activities undertaken.
  - Covid 19 – The Constabulary continue to report on this as a specific absence type. We follow the national approach with staff refraining from attending the workplace (5 days) and facilitate

      home working when we are able to, if people feel well enough to work. Covid-19 now counts towards sickness measures.

- o General – No specific activities undertaken.
- o Psychological – A drill down in absence data demonstrates a relatively even split between work related and non work-related mental health absences. There has and continues to be a lot of support with respect to psychological ill health. Managers are required to complete a stress risk assessment for all cases where work has been cited as the trigger and are mandatory if they wish to refer onto Occupational Health. Confidential counselling is provided, with the constabulary funding 6 sessions. In the vent of trauma related absence, we provide trauma focussed CBT (Cognitive Behavioural Therapy) as well as EMDR (Eye Movement Desensitisation and Reprogramming) in line with NICE Standards. Proactively we participate in the College of Policing Psychological Screening programme, which allows us to identify early signs of anxiety, depression as well as burnout and early signs of traumatic injury in our most vulnerable and high-risk roles.
- o Early intervention emails are sent to managers when any individual reports absent, so that a referral can be submitted at the earliest opportunity as this is known to be the best support to act quickly. Managers can participate in attendance surgeries to discuss cases with HR and OH professionals to ensure they are fully supporting individuals. The inclusion hub continues to offer additional support.
- o Stress related issues continue to be one of the most common themes of management referrals to Occupational Health (OH) – during the consultation's reasons given often relate to demand and resources. OH are monitoring this and will report at future Workforce Boards in relation to the breakdown of officers and staff, the Commands and main reasons.

- Reviewing completion of Return to Work Interviews to ensure managers have these important conversations with individuals and consider any support to enable the person to stay in the workplace and prevent future absences in some cases.
- Recuperative duties – message to be cascaded to managers to review Business Interest agreements if appropriate, as a supportive measure to enable the individual to return to full hours and tasks. Documentation to be updated to remind managers to have discussion.
- Limited duties data is provided to Chief Officer Group on a quarterly basis to ensure that those unable to work in their substantive roles, are contributing to the priorities of the Constabulary in an inclusive and supportive way.
- Closed Work Force Silver in January & review of cases with senior managers – there is a clear picture of cases being supported and managed and progressed through the correct process i.e. UAP / ill health retirement / return to work etc
- Better Health at Work – the Constabulary has received the Gold Award
- Link on OH site to Oscar Kilo (national wellbeing framework) for additional tools and support
- HR have a dedicated SPOC for Neurodiversity. The guidance on the inclusion hub is currently being updated to ensure individuals and their managers have a good understanding of what support is available. Alongside this, HR are reviewing the Access2Work process to remove some barriers and speed up the process of allocating resources and support to individuals.

III. Attrition rates

Current Turnover Rates (past 12 months):

Police Officer – Overall 7.3%
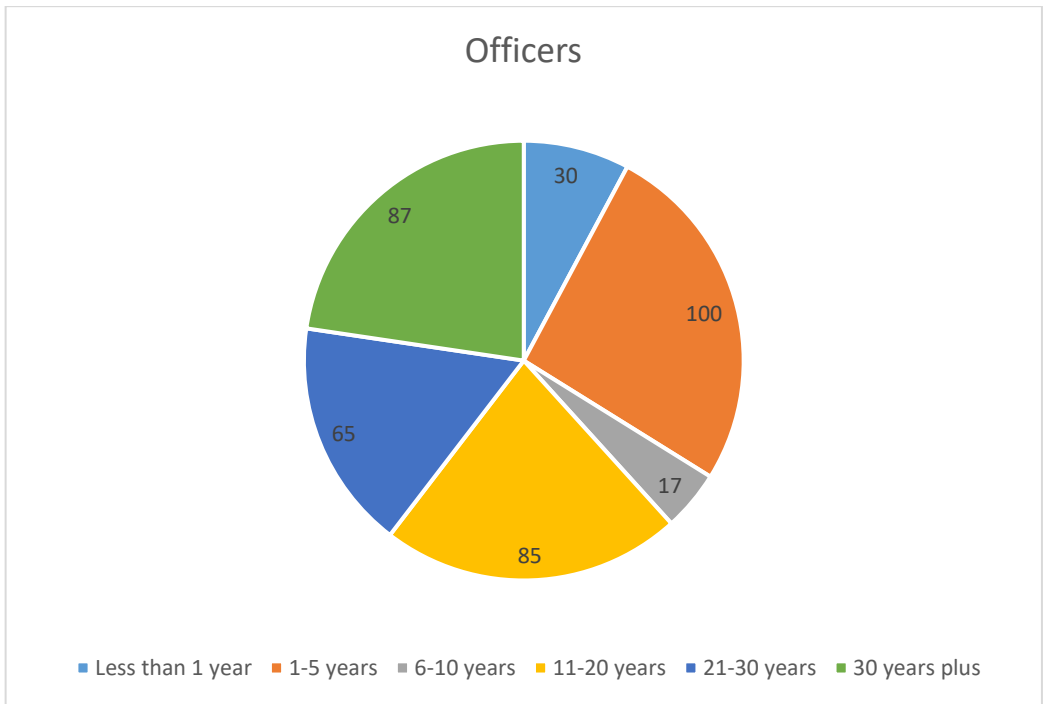- Retirement – 3.5%
- Resignation – 3.0%
- Transfer Out - 0.9%

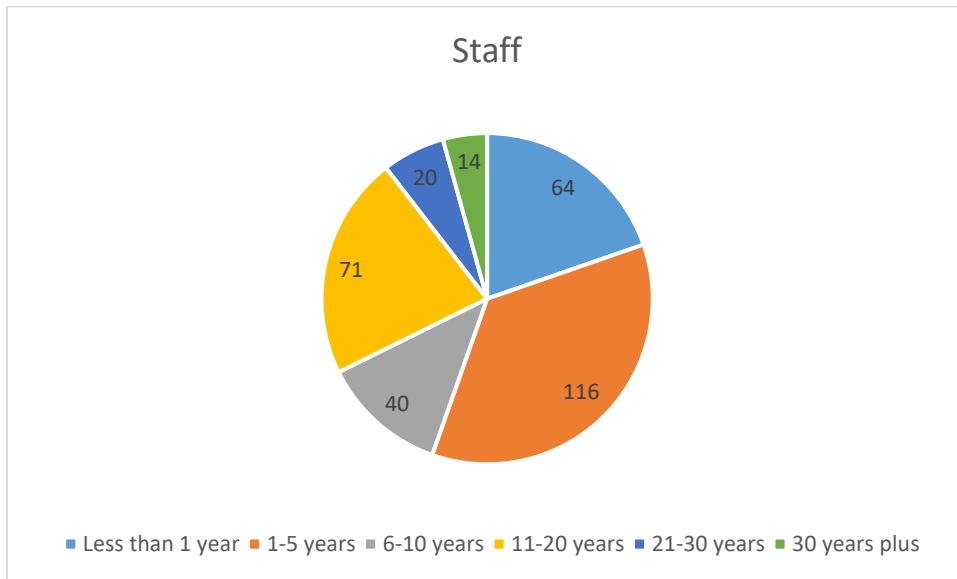**Police Staff** – 11.6%

PCSOs – 11.0%

Length of Service

Based on leavers April 2020 – March 2023

The below table details the current split between Officer resignations over the past 3 years. As detailed the majority of leavers are in the 1-5 year service period. This mirrors national trends. It is expected this will continue in the next two years due to the number of new officers recruited through Uplift. It is also anticipated that 2023/24 will be the first year the force sees more officer resignations than retirements.

Officers

Legend: ■ Less than 1 year ■ 1-5 years ■ 6-10 years ■ 11-20 years ■ 21-30 years ■ 30 years plus

Values shown: 30, 100, 17, 85, 65, 87

The table overleaf details the current split between staff resignations over the past 3 years. Like officers, as detailed the majority of leavers are in the 1-5 year service period

Staff

Legend: ■ Less than 1 year ■ 1-5 years ■ 6-10 years ■ 11-20 years ■ 21-30 years ■ 30 years plus

(Pie chart values: 64, 116, 40, 71, 20, 14)

Diversity Data

Based on leavers April 2020 – March 2023

Ethnicity	Officers	Staff
Asian or Asian British - Pakistani	0.4%	0.0%
Black or Black British - Any Other Black Background	0.0%	0.4%
Choose Not to Disclose	1.8%	5.8%
Mixed - Any Other Mixed/ Multiple Ethnic Background	0.0%	0.4%
Unknown	0.4%	0.4%
White - Any Other White Background	0.0%	3.1%
White - English/Welsh/Scottish/Northern Irish/British	97.5%	89.5%
White - Irish	0.0%	0.4%

The above table shows a breakdown of all leavers by ethnicity over the past 3 years. As detailed a significant number of the leavers are White - English/Welsh/Scottish/Northern Irish/British. The number of leavers from minority backgrounds is disproportionately lower than the current force representation of 3.9%. The Positive Action team continue their proactive work around retention including 121 sessions.

Gender	Officers	Staff
Male	72.2%	45.8%
Female	27.8%	54.2%

The above table shows a breakdown of all leavers by gender over the past 3 years. The amount of male leavers is disproportionately higher than the male representation, which is currently 58% for officers and 36% for staff.

Retention Strategy

The Constabulary are currently finalising a new retention strategy which outlines the forces approach to retention going forward, including the introduction of "stay conversations", improved exit interviews and improved data analysis.

Constabulary Report to OPCC

TITLE OF REPORT:	**Constabulary Grievances**

DATE OF MEETING:	**04 May 2023**

ORIGINATING OFFICER:	**Diane Johnson - HR Manager**

PART 1 or PART 2 PAPER:	**PART 1 (OPEN)**

Executive Summary:

The report provides a position overview in respect of ongoing, finalised and newly submitted grievances for the period 01 November 2022 to 31 March 2023.

The last report was November 2022.

Recommendation:

• That the Ethics and Integrity Panel note the report.

People Department / Human Resources / DJ

MAIN SECTION

1. Introduction and Background

1.1 The attached Grievance Statistics Report shows the number of grievances lodged during the period 01 November 2022 up until 31 March 2023, together with a summary of ongoing and finalised cases within the reference period.

1.2 Included in the report is an overview of the characteristics of those lodging grievances. The report identifies the gender and race of those submitting grievances as well as an overview as to the nature of the grievance. In addition, statistics relating to whether the aggrieved is a police officer or member of staff and whether the grievance relates to alleged discrimination have been included.

1.3 Summary position is as follows:

- 6 grievances were ongoing during the reference period and there were 2 new grievances lodged in this reporting period.

- 1 remains outstanding at the end of the reporting period.

- 3 relate to interpretation of Terms & Conditions, 2 relates to relationships in the workplace, 1 in relation to less favourable treatment and 1 in relation to queries concerning job profiles linked to potential redundancy. 1 remains in the process due to ongoing in another external process.

- Grievances dealt with during this period are approximately 62% male and 25% female; with one being a collective grievance relating to both male and female and the majority are from a white, British ethnicity with one unknown. The data from the collective grievance is not contained within the %.

2. Issues for Consideration

2.1 Drivers for Change

• There is an emerging theme surround interpretation of Police Staff Terms & Conditions. 1 (2 people) was heard at an Employment Tribunal and found in their favour and the other is the collective grievance.

3. Financial Implications and Comments

3.1 Please see Risk and Equality Implications

4. Legal Implications and Comments
Including advice received.

4.1 Please see Risk and Equality Implications

5. Risk Implications
.

5.1 With any complaint which is potentially linked to the employment relationship there is the risk of employment tribunal or judicial review should the matter not be resolved.

5.2 Through working in partnership with Unison and the Federation the aim is to continue to avoid formal proceedings and resolve issues in an informal manner to the satisfaction of all parties. The new Grievance procedure clearly identifies the informal and formal stages.

5.3   Specific items impacting on equality are raised through the Diversity and Inclusion Group (DIG) to ascertain if there are any issues that the Constabulary should be dealing with. At this time no issues have been raised.

5.4   The HR Department will continue to meet with the Federation and Unison when necessary to discuss issues that are emerging and look to informally resolve them prior to a formal grievance being submitted. The Constabulary proactively engages to address concerns.

6.   HR / Equality Implications and Comments

6.1   HR and Legal Services will be reviewing the judgement of any Employment Tribunal cases to identify any lesson to be learned with a view to appropriate dissemination within the Constabulary.

6.2   The internal pool of accredited mediators is available for utilisation through the Constabulary Mediation Scheme.

7.   Supplementary Information

7.1 List any relevant documents and attach to report

- Appendix 1 - Grievance Data for the reference period

People Department / Human Resources / DJ

Grievances – Overview 01 November 2022 to 31 March 2023

	01/11/22 to 31/03/23	01/04/22 to 31/10/22	01/10/21 to 31/03/22	01/04/21 to 30/09/21	01/11/20 to 31/03/21	01/10/19 to 31/10/20	01/04/19 to 30/09/19	01/10/18 to 31/03/19
Total No. of grievances submitted in period	2	-	3	8	7	2	4	5
Total No. of grievances ongoing at start of period	6	7	8	5	1	7	7	4
Resolved Stage 1		-	-	2	-	-	-	2
Resolved Stage 2		1	-	-	-	-	-	-
Resolved Stage 3	2	-	3	1	-	-	-	-
Resolved informally prior to Stage 1	1	-	-	1	3	-	-	-
Not Resolved	1	-	1	-	-	2	1	2
Awaiting Action/Resolution		4	6	8	5	1	4	4
Withdrawn	3	-	1	1	-	4	-	-
On Hold		1	-	-	-	2	3	-
Transferred to alternative procedure	1	1	-	-	-	-	3	-

Professional Standards Department

Ethics and Integrity Panel Report

2022/2023 Q4

April 2023

T/DCI Hayley Wilkinson – Head of Professional Standards

Hannah Pocock – Force Intelligence Analyst, Anti-Corruption Unit

Contents

Public Complaints	
Other Updates and Hot Topics	
Appendices:	
A – Public Complaint Cases and Allegations *B – Public Complaint Allegations by Complaint Group* C *– Incidents, Crimes and Custody Figures* D *– Complainant Characteristics* *E – Schedule 3 Reason* *F – Public Complaint Outcomes* *G – 2020 Complaint Groups and Allegation Types*	

This report combines three areas dealt with by Professional Standards Department: Public Complaints, Conduct, and Anti-Corruption Unit Intelligence.

Public Complaints and Conduct are assessed under the Police (Complaints and Misconduct) Regulations 2020 and Police (Conduct) Regulations 2020.

Conduct is reviewed in relation to Standards of Professional Behaviour as defined within the Code of Ethics:

Honesty and Integrity	**Duties and Responsibilities**
Authority/ Respect/ Courtesy	**Confidentiality**
Equality and Diversity	**Fitness for duty**
Use of Force	**Discreditable Conduct**
Orders and Instructions	**Challenging and Reporting Improper Conduct**

This report covers 2022/2023 Quarter 4 (Q4), 01/01/2023 to 31/03/2023. Figures in this report are correct as of 04/04/2023.
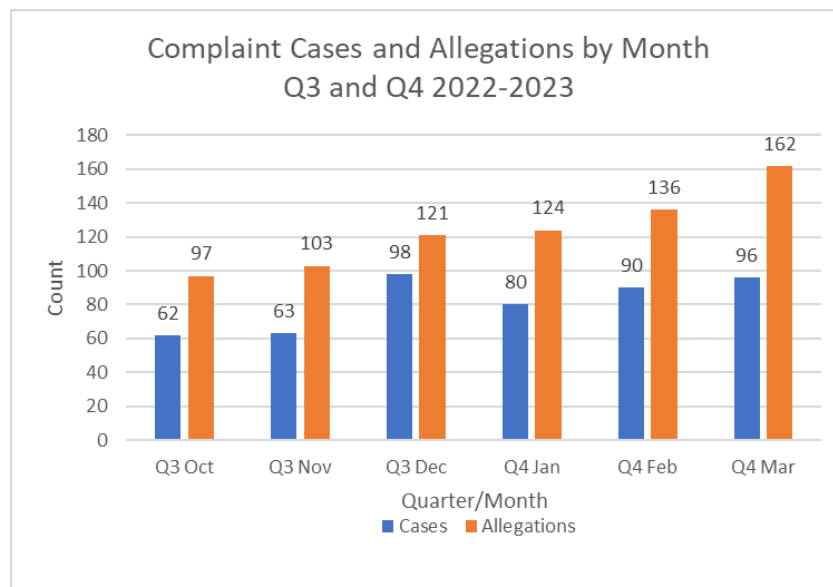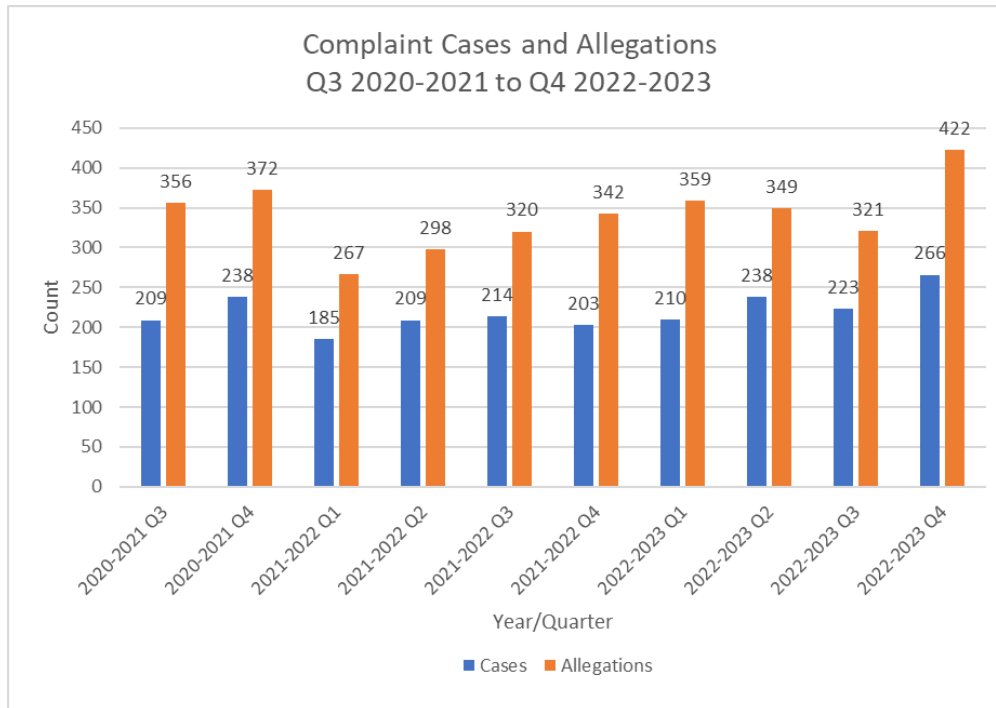
Conduct, Anti-Corruption Unit Intelligence, and certain commentary within the Public Complaints sections are not for publication. Please consult with the Head of Professional Standards prior to publishing any of the contents of this report.

In line with IOPC data collection and analysis, De-Recorded Public Complaint allegations and cases, unless otherwise stated, have been excluded from the below figures and commentary. De-Recorded cases and/or allegations may concern persons who are not eligible, as per the Police Regulations 2020, to make an expression of dissatisfaction and/or have been logged/recorded in error.

Unless otherwise stated, the below sections relate to allegations recorded within a given quarter and added to a case which has been logged/recorded in the same quarter. They do not include allegations which have been logged/recorded but added to an earlier quarter's case, e.g., allegation recorded in Q4 but added to a Q3 case; this is to allow more like for like comparisons between quarters.

Public Complaints

Complaints (expressions of dissatisfaction) have significantly increased in Q4. Cases have increased by 19.28% and allegations 31.46% when compared to the previous quarter, Q3. Complaint cases and associated allegations are at their all-time highest. This is despite incidents, crimes and custody arrests remaining relatively similar to Q3, with only a notable increase in voluntary custody attendance (*Appendix C*).

Complaint Cases and Allegations
Q3 2020-2021 to Q4 2022-2023

Year/Quarter	Cases	Allegations
2020-2021 Q3	209	356
2020-2021 Q4	238	372
2021-2022 Q1	185	267
2021-2022 Q2	209	298
2021-2022 Q3	214	320
2021-2022 Q4	203	342
2022-2023 Q1	210	359
2022-2023 Q2	238	349
2022-2023 Q3	223	321
2022-2023 Q4	266	422

Complaint Cases and Allegations by Month
Q3 and Q4 2022-2023

Quarter/Month	Cases	Allegations
Q3 Oct	62	97
Q3 Nov	63	103
Q3 Dec	98	121
Q4 Jan	80	124
Q4 Feb	90	136
Q4 Mar	96	162

Complaint allegations have seen a significant increase in Q4, with over 100 additional allegations compared to Q3. The increase in allegations correlates in part with the increase in complaints.

Case and allegation numbers have been variable month on month over the last 5 quarters, although, when compared to the same time period last year, previous Q4 (2021-2022), there are an additional 21 cases and 27 allegations logged/recorded per month see *Appendix A – Charts A1 and A2*.

The number of Schedule 3 cases has risen in Q4 compared to the rest of the 2022-2023 year and are starting to align to the previous year's figures. *Figures regarding Schedule 3 cases are correct as of 04/04/2023. Further Schedule 3 cases may be allocated post this date, likewise, cases in previous quarters may have increased post data extraction.*
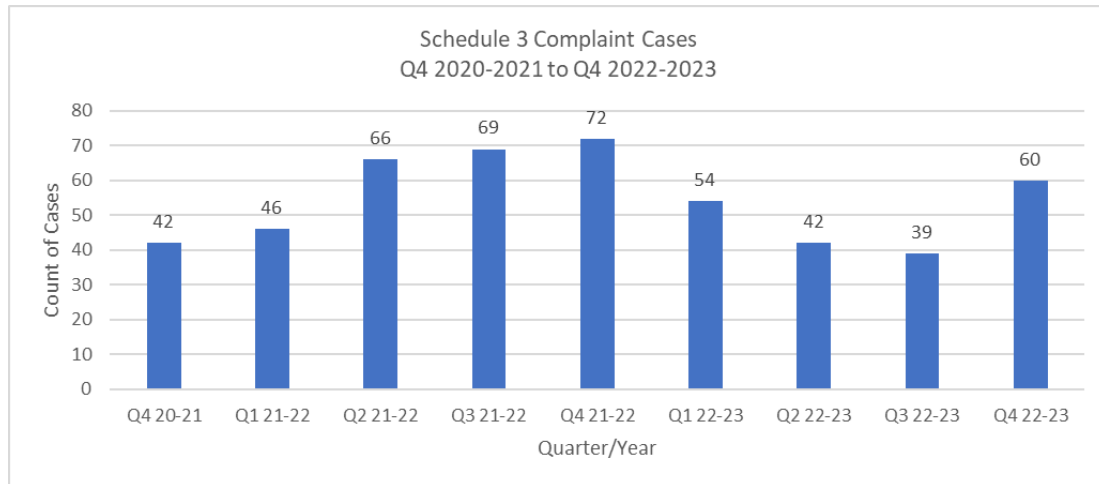
Due to the overall rise in complaints, it is expected that the Schedule 3 cases will continue to rise. The reason for the increase in Q4 is due to the *Force/LPB determine Schedule 3* cases and an increase in *Complainant dissatisfied after initial handling (Appendix E)*.

Prior to the start of this quarter, the department was divided to have dedicated complaints and dedicated conduct investigators.

The complaints team have since received training in-house on ensuring that complaints are broken down and all allegations recorded separately.

A process has been implemented in this quarter to ensure that where someone is a repeat complainant that new complaints are logged (and recorded where appropriate) rather than being added to an existing complaint. This informs a clearer picture of the complainant's complaint history.

Handling Times

Time taken to log complaints has been variable over the quarter and an increase in time taken to finalise cases has been evident throughout during Q3. *The below figures should be viewed with caution due to data quality issues.*

Contact Days (Case Received to Initial Contact) – Including De-Recorded Cases

Q4	January	February	March
0-5 days	11	7	5
6-10 days	25	9	11
11-20 days	32	34	60
21-30 days	6	16	21
Over 31 days	18	29	3

A tentative observation is that the time taken to make initial contact with the complainant became greater as the quarter progressed. It has also been noted that the time taken to contact a complainant of a Schedule 3 case is likely to be greater than that of a complainant from a case not deemed to be Schedule 3. However, caution is required due to data quality issues persisting throughout Q4.

Contact Days (Case Received to Initial Contact)– Including De-Recorded Cases
Schedule 3 and Outside Schedule 3 Cases

Q4	Outside of Schedule 3	Schedule 3
0-5 Days	22	1
6-10 Days	42	3
11-20 Days	116	10
21-30 Days	29	15
Over 31 Days	20	31

Days taken to log Complaint (Case Received to Case Logged) – Including De-Recorded Cases

Q4	January	February	March
0-5 Days	82	66	96
5+	11	30	4

A total of 270 cases (93% including De-Recorded cases) were logged within 7 days of having been received, this is a 4% improvement on Q3. Of these cases, 84% were logged within 5 days. March saw a significant improvement in the time take to log complaints, with 75% of all March cases being logged within 2 days or less and 96% of all cases logged within 4 days or less.

Average Finalisation Times of Cases Logged/Recorded and Finalised

Finalisation figures include only cases logged in Q4 and finalised in Q4, they do not include roll over legacy cases from previous quarters, this allows a fair comparison between quarters.

	Average number of days to finalise Complaint Case **Outside Schedule 3**	Average number of days to finalise Complaint Case **Schedule 3**
Q1 21/22	17.5	31.4
Q2 21/22	4.91	31.81
Q3 21/22	7.15	26.88
Q4 21/22	5.98	26.09
Q1 22/23	6.73	21.5
Q2 22/23	10.4	20.6
Q3 22/23	18 *(Including De-Recorded Cases)*	30 *(Including De-Recorded Cases)*
Q4 22/23	17.44 *(Including De-Recorded Cases)* 150 Finalised 81 Cases remain Live	44 *(Including De-Recorded Cases)* 7 Cases Finalised 54 Remain Live

Finalisation figures include only cases logged in Q4 and finalised in Q4, they do not include roll over legacy cases from previous quarters, this allows a fair comparison between quarters.

Time taken to finalise cases has significantly increased for all cases in particular cases logged Outside of Schedule 3. Further insight into the Outside Schedule 3 cases shows how many weeks it is taking to finalise a case.

Q4	Days to Finalise	Count of Cases
1 Week	0-6 Days	19
2 Weeks	7-13 Days	42
3 Weeks	14-20 Days	34
4 Weeks	21-27 Days	32
Over 4 Weeks	28+ Days	23
Remain Live	N/A	81

The total number of cases logged/recorded in Q4 and finalised in Q4 was 154 and those logged/recorded in Q4 and remaining live at the end of Q4 is 135. This is a 53/46 split and shows a decrease in performance compared to Q3 which was a 60/40 split. However, given the increase in cases logged/recorded in Q4 this likely accounts for the larger number of cases remaining live at the end of the quarter as capacity has been breached as the number of cases logged/recorded and finalised in previous Q3 was 151 cases (3 less than Q4).

During Q4, 43% of cases were *Resolved*, 1% were *Not Resolved NFA* or *NFA required* and 5% determined as '*The service provided was acceptable*'. No cases were finalised with '*The service was not acceptable*'. *(Appendix F).*
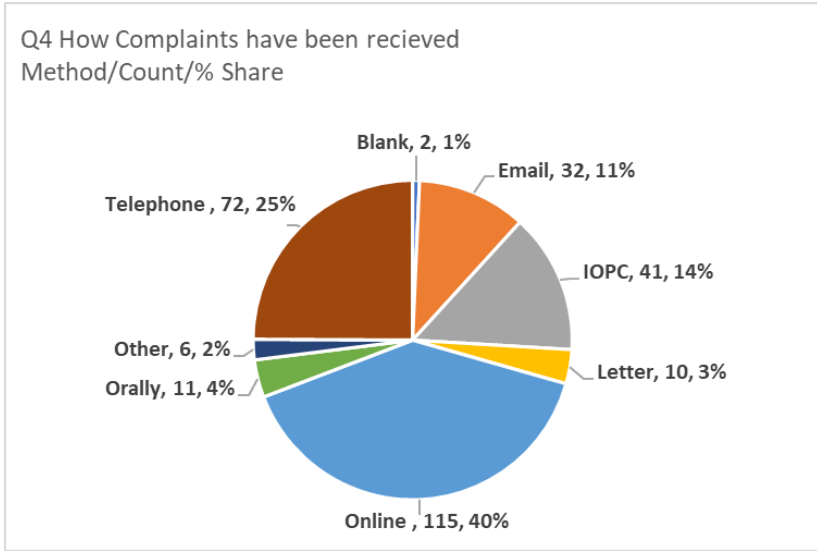
Q4 has seen an unprecedented increase in complaints, with the added challenge of being without a complaints and misconduct manager.

A review of complaint handling has been requested to better understand demand, efficiency, and effectiveness.
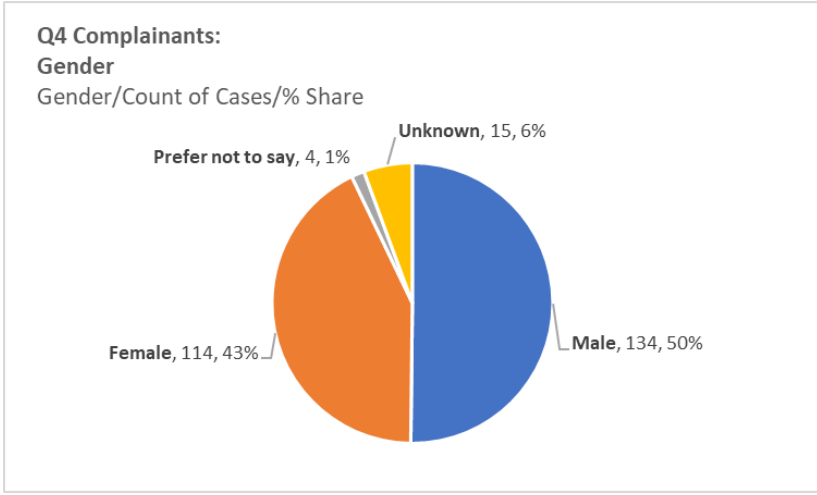
Complaints Received

During Q4, 290 complaints (including 23 De-Recorded) were received through various routes; Online complaints remain the most common. The overall % share of complaints received Online, telephone and oral complaints have all risen in Q3 compared to Q4. Online complaints have risen from 35% to 40%, telephone from 23% to 25% and oral complaints from 0% to 4%.
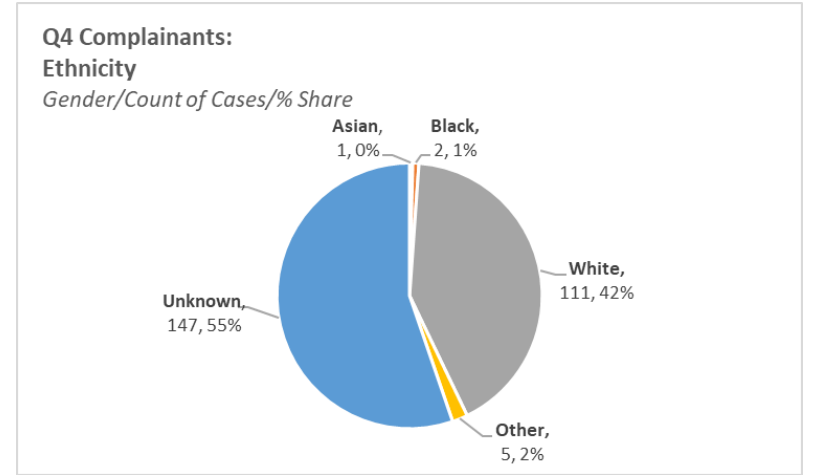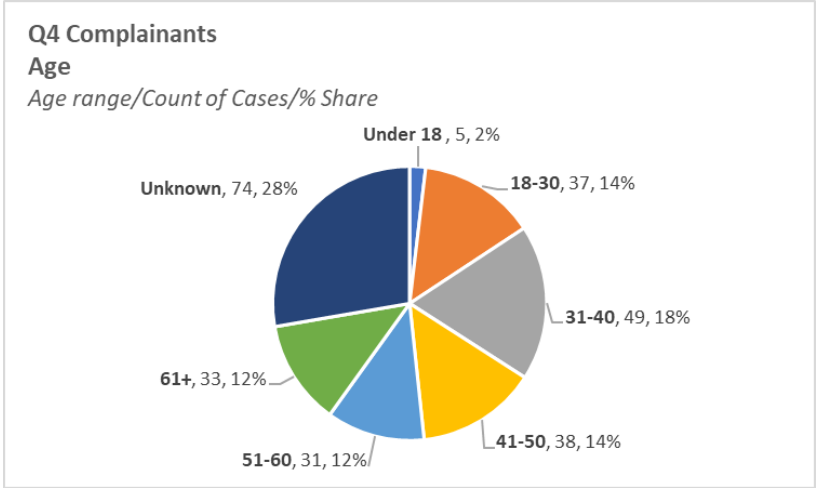
Q4 How Complaints have been recieved
Method/Count/% Share

Blank, 2, 1%
Email, 32, 11%
Telephone , 72, 25%
IOPC, 41, 14%
Other, 6, 2%
Orally, 11, 4%
Letter, 10, 3%
Online , 115, 40%

Complainant Characteristics

From the Complainant Characteristics data available, complaints are still more likely to be submitted from Males (50%) rather than Females (43%) although the split is not as great as in Q3 (60% Male and 38% Female). However, the number of unknown data sets has risen for Gender, Ethnicity and Age Range compared to Q3, this is despite internal reminders and an increase of online complaints whereby the data capture for such characteristics is presented to the complainant to complete. The issue of unknown data in general is a nationwide issue.

Q4 Complainants:
Gender
Gender/Count of Cases/% Share

Unknown, 15, 6%
Prefer not to say, 4, 1%
Male, 134, 50%
Female, 114, 43%

Q4 Complainants
Age
Age range/Count of Cases/% Share

Under 18, 5, 2%
18-30, 37, 14%
31-40, 49, 18%
41-50, 38, 14%
51-60, 31, 12%
61+, 33, 12%
Unknown, 74, 28%

Q4 Complainants:
Ethnicity
Gender/Count of Cases/% Share

Asian, 1, 0%
Black, 2, 1%
White, 111, 42%
Other, 5, 2%
Unknown, 147, 55%

See *Appendix D* for breakdown of *Complainant Ethnicity: Self Classification*.

Ethnicity is not known in over half of the cases, this is an increase on Q3. The percentage of cases in the 51-60 age range has decreased from 8% to 12%, this was a prominent age range in Q3. The percentage of cases relating to White complainants have been cited as 42% a decrease from 50% in Q3, although it is anticipated that the Unknown individuals most likely will fall into this category based on previous reports. Therefore a complete analysis of complainants' characteristics cannot be fully undertaken and the data quoted above is to be reviewed with caution although broadly represents Q3 data splits.
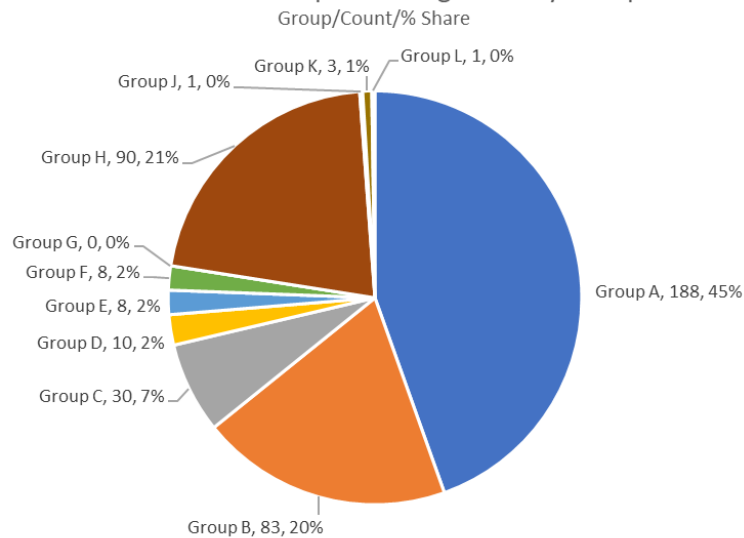
It remains a performance indicator for service recovery complaint handlers to consistently ask what a complainant's self-classified ethnicity is. Dip sampling of finalised complaint cases to check for compliance has been tasked to start in May 2023.

A new single online home form, where data is automatically ingested into Centurion, went live at the end of this quarter and so we await next quarters' results to see if this improves recording.
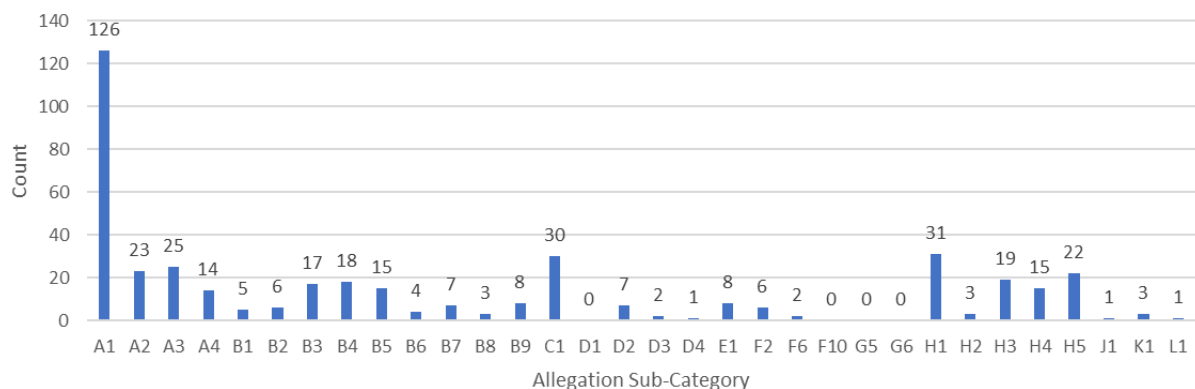
Complaint Allegations

Complaints continue to be logged/recorded under the two most common complaint groups, *Group A – Delivery of duties and service* and *Group B – Police powers, policies and procedures.* Group A complaints have risen in line with the overall 1/3 increase of allegations in Q4, although Group B have not increased to the same extent at only 22% more allegations in Q4 compared to Q3. The third most common complaints group, *Group H – Individual Behaviours* complaints have seen a 53% rise in the number of allegations which has pushed the Group H overall share of allegations from 18% to 21%, an increase of 59 allegations in Q3 to 90 allegations in Q4. Other complaint groups have either maintained the same overall share of allegations or have decreased (*Appendix B, Chart B1* and *Chart B2)*.

Q4 Count of Complaint Allegations by Group
Group/Count/% Share

- Group J, 1, 0%
- Group K, 3, 1%
- Group L, 1, 0%
- Group H, 90, 21%
- Group G, 0, 0%
- Group F, 8, 2%
- Group E, 8, 2%
- Group D, 10, 2%
- Group C, 30, 7%
- Group A, 188, 45%
- Group B, 83, 20%

Complaint Group
A-Delivery of duties and service
B - Police powers, policies and procedures
C - Handling of or damage to property/premises
D - Access and/or disclosure of information
E - Use of police vehicles
F - Discriminatory behaviour
G - Abuse of position/corruption
H - Individual behaviours
J – Sexual Conduct
K - Discreditable conduct
L – Other

Q4 Complaint Allegations by Sub-Category

Sub-Category	Count
A1	126
A2	23
A3	25
A4	14
B1	5
B2	6
B3	17
B4	18
B5	15
B6	4
B7	7
B8	3
B9	8
C1	30
D1	0
D2	7
D3	2
D4	1
E1	8
F2	6
F6	2
F10	0
G5	0
G6	0
H1	31
H2	3
H3	19
H4	15
H5	22
J1	1
K1	3
L1	1

The types of allegations peaking this quarter have generally varied to those noted in the previous Q3 report. Individual behaviours of officers and general service provided appear to be the main issues in Q4 which account for the rise in complaints. (*Appendix B, Chart B3*).

Group H – Individual Behaviours

The previous quarter (Q3) witnessed a decrease in Group H complaint allegations, but these have risen in Q4 and are now the highest they have been in the last year.

	Q4 21-22	Q1 22-23	Q2 22-23	Q3 22-23	Q3 22-24	% Change Q3 to Q4
Group H	66	67	68	59	90	**53%**

There has been increases across the bulk of allegation types that fall under Group H which is greater than the overall general increase of 1/3 more allegations this quarter. *H1 Impolite language and tone*, *H2 Impolite and intolerant actions*, *H3 Unprofessional attitude and respect* and *H5 Overbearing or harassing behaviours* have all increased above 1/3 compared to Q3 (*Appendix B, Chart B3*).

Of the 73 complaint cases citing an allegation from Group H, 14 of these refer to national factor *Call Handling* and 13 for *Investigations*.

From the information recorded on Centurion, there does not appear to be any particular geographical area or team which spike in Group H complaints. However, the data upgrade was only completed towards the end of Q4 and therefore the data set is not complete for analysis.

Where officers have been noted on complaints, there are 4 repeat officers in relation to Group H complaints, three of these officers are based in Command-and-Control Room (CCR) and the fourth based in Carlisle, they have either 2 or 3 cases each relating to Group H allegations. A total of 5 Lessons issued in Q4 related to the attitude and tone used by officers when speaking to members of the public, primarily over the telephone. Two of these lessons were issued to one of the CCR repeat officers. In total 5 lessons were issued to CCR staff, some individual and some organisational (*Appendix H*).

Group A – Delivery of duties and service

A4 General level of service

Although overall Group A allegations have risen in line with the increase in complaints, there has been a significant increase in A4 allegations. These types of complaints had decreased in Q3 (3 allegations) but have now risen above Q2 levels (10 allegations) with Q4 noting 14 allegations. Complaints relate to lack of updates or proactive crime investigation when there have been lines of enquiries, however, a minor theme related to three complaints regarding delayed issuance of firearms licences.

A3 Information

Of the 23 cases citing an allegation of A3 they relate to complainants having to make subject access requests for data and not receiving all the data they wish to obtain, as well as lack of updates on cases being investigated and general lack of contact from officers when contact has been sought from the complainant.

The work needed to re-configure Centurion for the new BCU structure has now been done.

Whilst we are not able to provide departmental data this quarter (see below), as mentioned above, we have noted an increase in complaints concerning call handling. This has been fed back to their chief inspector via our prevent officer and by PSD SLT. Operational Support Superintendent has requested complaints data specific to this department also, which we are progressing.

We continue to go into areas on site visits, visibility briefings and brief leadership teams on trends.

Complaints by Department

Currently unable to report upon, however, ICT work was undertaken in Q4 and it is expected that departmental figures should be reportable in Q1 2023-2024 report.

Referrals to the IOPC

Between January and March 2023, Cumbria Constabulary referred a total of 12 cases to the Independent Office for Police Conduct (IOPC), an increase of 1 additional referral compared to Q3.

Four referrals resulted from complaints, 3 from conduct and 5 miscellaneous. These can be broken down into 6 Death or Serious Injury (DSI), 3 sexual assault/offence, as well as 1 each for relevant offences, other and voluntary referral.

Length of Service

In Q4 a total of 152 cases (57% excluding De-Recorded cases) established a known individual as the subject. The number of individuals cited has risen from 131 in Q3 to 172 in Q4. However, 43% of cases do not cite any known individuals, this is likely due to the large number of cases still Live at the end of Q4, thus, the below data is again to be considered with caution.
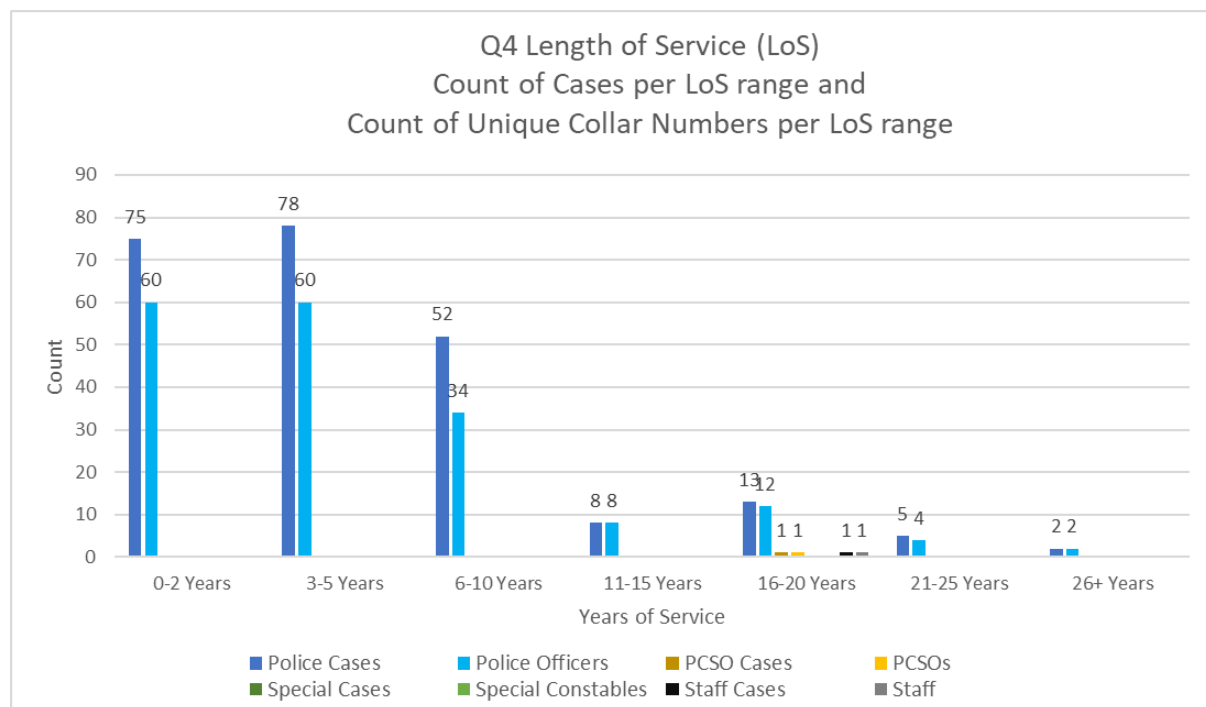
Where there is at least one identified subject of a complaint case who is a police officer, it is officers with less than 5 years' service, who are most likely to be subject of the complaint. Similar to Q3, there is an equal share between 0-2yrs and 3-5yrs service. However, those with 3 years' of service are most likely to be subject of a complaint, with peaks then showing again around 8 years and 19 years.

Q4 Length of Service - Count of Police Officers
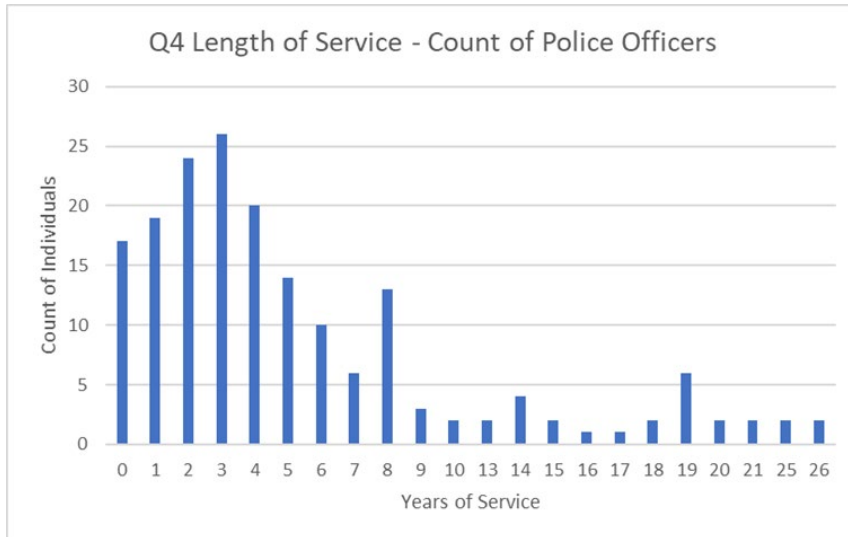
As in the last quarter, younger in-service officers tend to be the most complained about. Those with 3 years' service are at the stage in their careers when they are not long or just through their probationary period.

Work is still ongoing in Information Management on young in-service officers more holistically.

Other Updates and Hot Topics

Organisational Learning

Lessons Learnt in Q4 spanned a variety of topics *(Appendix H)*, 21 Lessons were issued in Q4, an increase of 9 compared to Q3. Themes have included the attitude and behaviour of officers whilst speaking to members of the public, this tying partly into the attitude and actions of CCR staff, which reflects the above findings noted in relation to rise in Group H complaints. As well as the general training of officers on subjects such as transgender individuals. Younger in-service officers feature most prominently alongside some longer serving repeat officers.

PSD Communications

The first issue of the newly created The Standard was published in Q4 covering PSD FAQs, The Standards of Professional Behaviour, current misconduct trends and vetting update.

Other Updates

Force Intelligence Analyst leaving in Q1 and recruitment process started to replace analyst although this may impact on Q1 data analysis.

Freedom of Information (FOI) Requests.

This quarter saw an increase in FOI requests, particularly concerning vetting and sexual misconduct. We have a solution to reduce the demand that answering each FOI brings, whilst providing sufficient information to the public. However, we are conducting some fact finding with other forces before it is published.
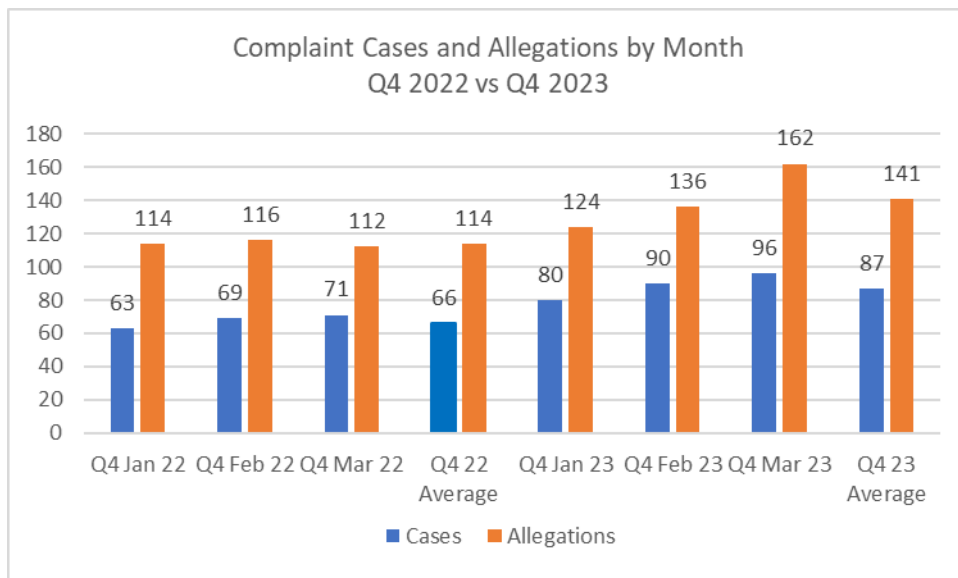
Appendices

Appendix A - *Public Complaint Cases and Allegations Q3 2020-2021 to Q4 2022-2023*

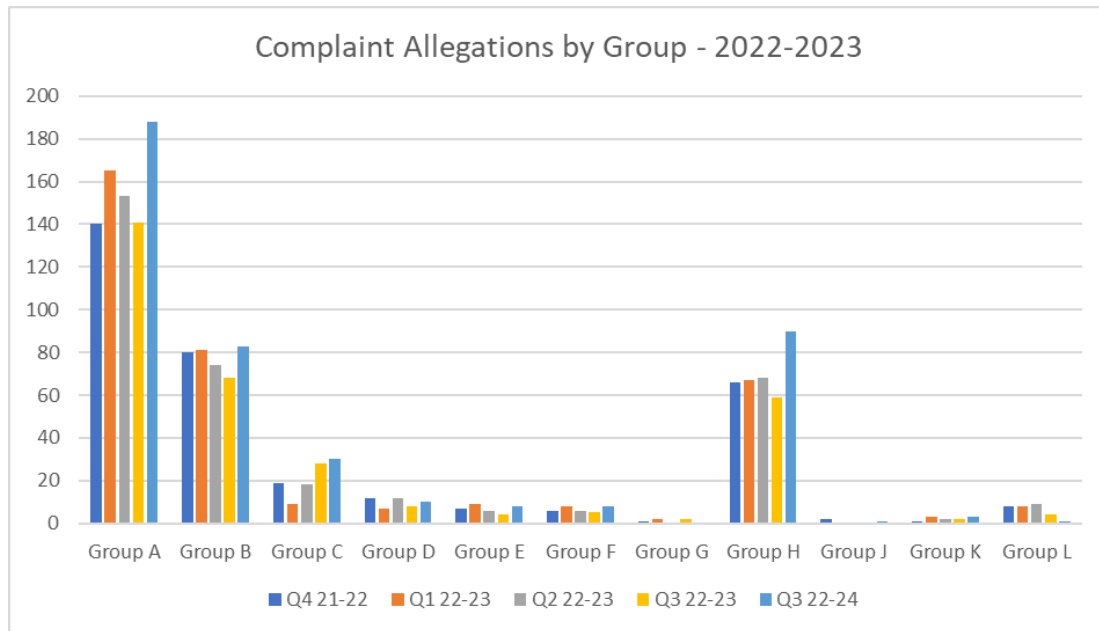***Chart A1*** *Q3 2020-2021 to Q4 2022-2023 Complaint Cases and Allegations*
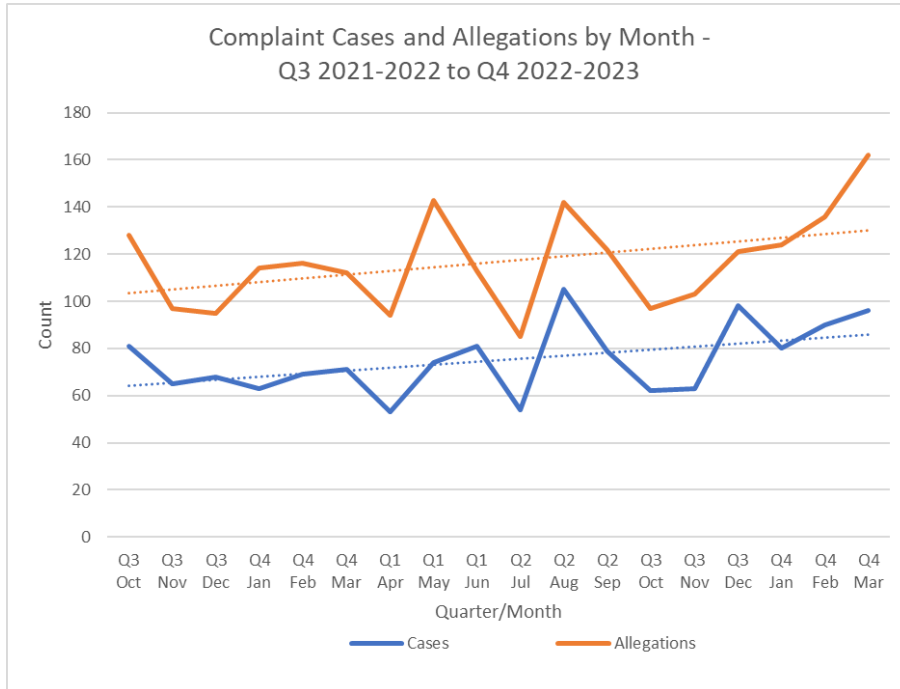
Chart A2 *Q4 2021-2022 (2022) vs Q4 2022-2023 (2023) Complaint Cases and Allegations by Month*

**Appendix B** – *Public Complaint Allegations by Complaint Groups*

Chart B1 *Complaint Allegations by Group Q4 2021-2022 to Q4 2022-2023*

Table B2 *Count of Allegations per Complaint Group (excluding De-Recorded) for the previous year*

	Q4 21-22	Q1 22-23	Q2 22-23	Q3 22-23	Q3 22-24	% Change Q3 to Q4
Group A	140	165	153	141	188	33%
Group B	80	81	74	68	83	22%
Group C	19	9	18	28	30	7%
Group D	12	7	12	8	10	25%
Group E	7	9	6	4	8	100%
Group F	6	8	6	5	8	60%
Group G	1	2	0	2	0	-100%
Group H	66	67	68	59	90	**53%**
Group J	2	0	0	0	1	Up
Group K	1	3	2	2	3	50%
Group L	8	8	9	4	1	-75%

Table B3 *Allegation Sub-Types (excluding De-Recorded) Q2-Q4*

Complaint Allegation Sub-Types Q2-Q4 2022-2023
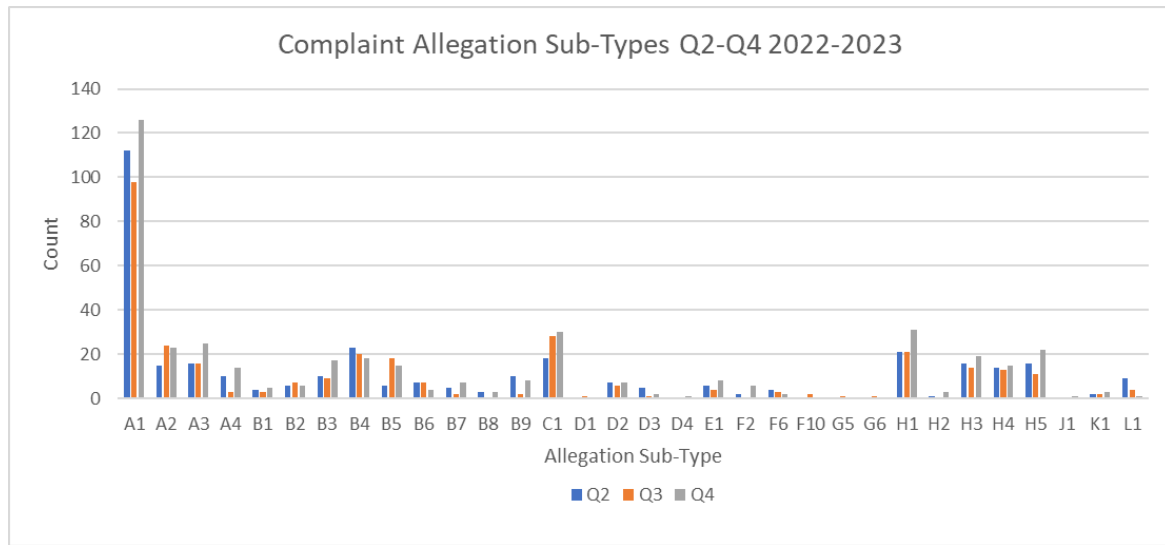
Appendix C – *Q4 Incidents, Crimes and Custody Figures*

	2022-2023 Q3	**2022-2023 Q4**	**% Change Q3 to Q4**
Incident Logs	21796	21698	-0.45%
Incident Logs minus duplicates/errors	20876	20821	-0.26%
Crimes	9185	9243	+0.63%
Custody: Arrests	2398	2367	-1.29%
Custody: Voluntary Attendance	947	1090	+15.10%
Custody Total	3345	3457	+3.35%

Appendix D – *Complainant Characteristics*

Q3 Complainants - Ethnicity Self Classification
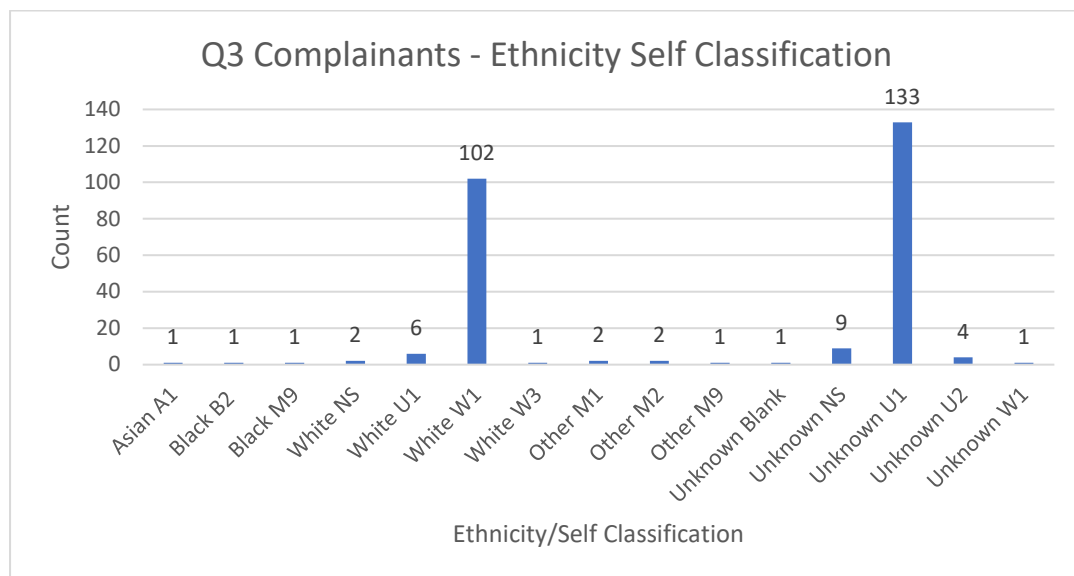
Appendix E – *Schedule 3 Reason*

Count of Complaint Cases - Schedule 3 Reasons
Q4 2020-2021 to Q4 2022-2023
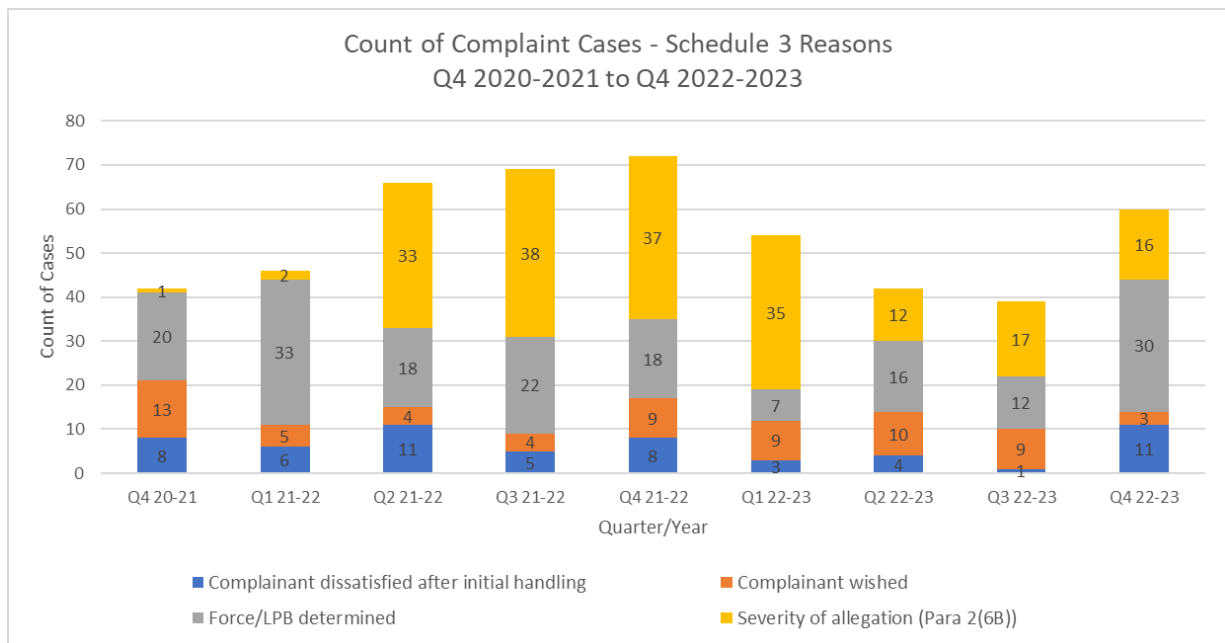
Appendix F – *Public Complaint Outcomes (as of 04/04/2023)*

Complaint Case Outcome	Q3 Count of Cases	Q3 % of Cases	Q4 Count of Cases	Q4 % of Cases
Live	82	35.50%	**135**	**46.71%**
Resolved	134	58.01%	**123**	**42.56%**
Not Resolved NFA	1	0.43%	**2**	**0.69%**
NFA Required	1	0.43%	**1**	**0.35%**
Not determined if the service provided was acceptable	3	1.30%	**0**	**0.00%**
The service provided was acceptable	2	0.87%	**5**	**1.73%**
The service provided was not acceptable	0	0.00%	**0**	**0.00%**
Withdrawn	0	0.00%	**0**	**0.00%**
De-Recorded	8	3.46%	**23**	**7.96%**
Not resolved – Moved to Schedule 3	0	0.00%	**0**	**0.00%**
Total	*231*	*100.00%*	*289*	*100.00%*

Appendix G – *2020 Complaint Groups and Allegation Types*

Complaint Group	Code	Complaint Allegation Type
Delivery of duties and service A1 – A4	A	A1 Police action following contact A2 Decisions A3 Information A4 General level of service
Police powers, policies and procedures B1 – B9	B	B1 Stops, and stop and search B2 Searches of premises and seizure of property B3 Power to arrest and detain B4 Use of force B5 Detention in police custody B6 Bail, identification and interview process B7 Evidential procedures B8 Out of court disposals B9 Other policies and procedures
Handling of or damage to property/premises	C	C1
Access and/or disclosure of information D1- D4	D	D1 Use of police systems D2 Disclosure of information D3 Handling of information D4 Accessing and handling of information from other sources
Use of police vehicles	E	E1
Discriminatory behaviour F1 – F10	F	F1 Age F2 Disability F3 Gender reassignment F4 Pregnancy and maternity F5 Marriage and civil partnership F6 Race F7 Religion or belief F8 Sex F9 Sexual orientation F10 Other
Abuse of position/corruption G1 – G6	G	G1 Organisational corruption G2 Abuse of position for sexual purpose G3 Abuse of position for the purpose of pursuing an inappropriate emotional relationship G4 Abuse of position for financial purpose G5 Obstruction of justice G6 Abuse of position for other purpose
Individual behaviours H1 – H5	H	H1 Impolite language/tone H2 Impolite and intolerant actions H3 Unprofessional attitude and disrespect H4 Lack of fairness and impartiality H5 Overbearing or harassing behaviours
Sexual conduct J1 – J3	J	J1 Sexual assault J2 Sexual harassment J3 Other sexual conduct
Discreditable Conduct	K	K1
Other	L	L1