
Enquiries to: Mrs J Head
Telephone: 01768 217734

Our reference: JH/EIP

Date: 26 October 2022

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 **Wednesday 8 February 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 To confirm the restricted notes of the meeting of the Ethics and Integrity Panel held on 3 November 2022 (copy enclosed).	5 minutes
5.	CORPORATE UPDATE To receive a briefing from DCC Carden and OPCC Chief Executive Gill Shearer	15 minutes
6.	BODY WORN VIDEO To receive a briefing regarding the first 30 seconds of body worn video footage - <i>to be presented by T/Chief Inspector Nick Oliver</i>	10 minutes
7.	VIOLENCE AGAINST WOMEN AND GIRLS To receive a report six monthly report on what is being achieved and whether it was making a difference within local communities - <i>to be presented by A/Inspector Matt Belshaw</i>	10 minutes

8.	<p>INFORMATION MANAGEMENT</p> <p>(a) To receive and note a report by Cumbria Constabulary on their compliance with Data Protection Legislation (copy enclosed) – <i>To be presented by Data & Information Privacy Manager (Lesley Johnson).</i></p> <p>(b) To receive and note a report by the Office of the Police and Crime Commissioner on their compliance with Data Protection Legislation (copy enclosed) – <i>To be presented by the OPCC Governance Manager</i></p>	15 minutes
9.	<p>INTEGRITY</p> <p>(a) To receive a report on the work carried out within the Constabulary’s Professional Standards Department, including Complaints by the Public; officer and staff misconduct and Anti-Fraud & Corruption– <i>to be presented by Chief Inspector Hayley Wilkinson</i></p> <p>(b) The Panel to provide feedback from the Vetting Decisions dip sample session</p>	20 minutes
10.	<p>YOUNG IN SERVICE OFFICERS (BELOW 3 YEARS)</p> <p>The Panel to be provided with an information pack that contains data and analysis since the start of Operation Uplift</p>	15 minutes
11.	<p>STOP AND SEARCH and USE OF FORCE CASE SAMPLING</p> <p>The Panel to provide feedback from the Stop and Search and Use of Force dip sample sessions.</p>	10 minutes
12.	<p>OPCC COMPLAINTS, COMPLAINT REVIEWS AND QSPI</p> <p>To receive and note reports regarding</p> <p>(i) OPCC Complaints & Reviews; and</p> <p>(ii) Quality of Service Issues received and work carried out <i>to be presented by the OPCC Governance Manager</i></p>	5 minutes
13.	<p>ETHICS & INTEGRITY PANEL ANNUAL REPORT</p> <p>To consider and agree the Panel’s annual report for 2022 - <i>To be presented by the OPCC Governance Manager</i></p>	5 minutes

Agenda Item No 4

ETHICS AND INTEGRITY PANEL

Notes of a meeting of the Ethics and Integrity Panel held on
Thursday 3 November 2022 in Conference Room 2, Police Headquarters, Penrith at 2.00 pm

PRESENT

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

Also present:

T/Chief Superintendent Mick Bird
ACO Nancie Shackleton
Head of Legal Services – Andrew Dobson
Director of Corporate Services – Stephen Kirkpatrick
HR Manager – Diane Johnson
Chief Inspector Hayley Wilkinson
OPCC Deputy Chief Executive – Gill Shearer
OPCC Governance Manager - Joanne Head

36. APOLOGIES FOR ABSENCE

No apologies for absence were received as all members were present

37. DISCLOSURE OF PERSONAL INTERESTS

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

38. URGENT BUSINESS

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

39. NOTES OF THE PREVIOUS MEETING

The notes of the meeting held on Wednesday 31 August 2022 previously circulated with the agenda were agreed.

Agreed; that, the notes of the meeting held on 31 August 2022 were agreed.

40. CORPORATE UPDATE

T/Chief Superintendent Bird briefed the Panel on the Constabulary's restructure to align with the changes as part of Local Government Reform. Local response had become more tailored with daily meetings to scrutinise how resources were being deployed and evaluating threat and harm on a local basis. More integration with partner agencies was working well with the new neighbourhood policing model. Dedicated officers with specific remits were being introduced under a robust framework of deployment. This was enabling visible policing to be broadened which would enable them to pick up on local issues and work with communities.

Changes had been made to the Constabulary's corporate governance and frameworks which included a new performance structure and meetings to ensure that the force were achieving their objectives. To ensure that HMICFRS recommendations were being identified and actioned these were being discussed on a monthly basis along with scrutiny of overall performance. A Strategic Change Board had been introduced to develop the force which T/Chief Superintendent Bird was happy to provide a presentation to the Panel in the future if they felt it would be beneficial.

The Panel were briefed on what the Constabulary were, and intended to do, in relation to vetting of officers and staff following a recent HMICFRS report. The audit had taken place in 2021 and T/Chief Superintendent Bird assured the Panel that the issues identified had or were being addressed. It was proposed that the Panel review and dip sample some of the Constabulary's vetting decisions. This would be factored into their 2023 work programme.

The Chief Executive provided an update to the Panel on work being carried out by the Commissioner and the OPCC, particularly in relation to Fire Governance. From 1 April 2023 the Commissioner would become to Cumbria Commissioner Fire and Rescue Authority. The Police and Crime Commissioner will carry out the role of shadow authority from 1 January 2023 until full implementation on 1 April 2023. This will allow the Commissioner to set the annual precept and carry out other financial duties. It was proposed and the Panel agreed that the OPCC would include work in relation to Cumbria Fire and Rescue Service as part of the 2023 programme and beyond. This would be developed with the Fire Service over the next few months.

AGREED; that

- (i) the verbal reports be noted;
- (ii) the Panel review and dip sample some of the Constabulary's vetting decisions in January 2023.

41. PROPERTY STORE

ACO Shackleton presented two reports, the first was a peer review which Humberside Police had carried out on the Constabulary's property services. It had identified some areas for

improvement such as general 'housekeeping' and retention of property. The second report identified the amount of property the Constabulary currently had, the identified risks and issues with the current system and what the proposals were going forward. These included carrying out a physical audit of all property currently being retained, looking at exhibits and speaking with officers to ascertain whether or not they needed to be retained.

Where property was no longer required, could not be returned or was confiscated, this may have the ability to be sold at auction. The profits from such sales would then be given to the Police and Crime Commissioner as part of his 'Property Fund'. This money was then made available to local groups who could bid for money to assist in community projects and help to prevent and deter individuals from crime.

The storage of property, especially those which required refrigeration or freezing was also to be looked at. It was recognised that new and specialist equipment was required for this and some of this could be funded from the profits at auction. Following a review of front counter staff and existing vacancies the Constabulary were proposing to introduce 4 property assistant roles who would take responsibility for property at the principle 4 sites for set opening hours. These new staff were due to take up their roles just before Christmas.

A new system was being introduced in the force from 2024 which would assist in the management of property. A temporary system would be introduced as part of the overall review. Further information on the proposed ISO accreditation requirements were awaited and would be included within the work being carried out. It was agreed that a six-month update would be provided to the Panel in May 2023.

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

42. CIVIL CLAIMS

The Head of Legal Services presented a report outlining active and closed Public Liability Claims, Employer Liability Claims, Employment Tribunal applications or proceedings.

The Panel discussed a number of claims with the Head of Legal Services including a recent employment tribunal which had found against the Constabulary. ACO Shackleton advised that Cumbria Constabulary was not on the national terms and conditions which had resulted in managers carrying out different practices at a local level. She advised that it was the intention to have a staff handbook which would enable working practices to be consistent across the force.

In addition to the report, the Panel were advised that an additional Public Liability Claim had been received. This was part of a case being reviewed by the IOPC and had the potential to be a significant risk. The outcome of the IOPC review was awaited.

The Panel noted that there were still a number of claims which related to damaged or lost property; it was recognised that these were historic issues which were taking time to deal with. It was hoped that the property store review and new practices would reduce these in the future.

Currently the report provided the members with values of claims settled for the previous six months. The Panel Chair asked if future reports could include a total for the year and for the previous 3 years on a rolling basis to enable them to be aware of the overall value of civil claims being paid out. Members also asked for organisational learning to be included and how this was disseminated within the force.

Agreed; that,

- (i) the reports be noted; and
- (ii) future reports include the annual total and the previous 3 years on a rolling basis
- (iii) organisational learning and how it is disseminated within the force to be included in future reports.

(Note: Andrew Dobson left the meeting at this point.)

43. OFFICER & STAFF UPDATE

The Director of Corporate Services, Stephen Kirkpatrick, briefed the members on the current position with recruiting officers as part of Operation Uplift. The Constabulary had to achieve a total establishment of 1,368 officers by the end of March 2023 and he advised that they currently had 1308. There were to be intakes of new officers to the force in October, November, December and a final intake in March 2023. The December and March intakes were as part of the IPDPL route and this would end in March going back to the degree entry route only. This process was a huge undertaking for the force with a financial penalty of £70k per officer they did not recruit as part of the Operation Uplift target.

In addition, the Constabulary had to factor in those officers who were due to retire and it was noted that there was a large number within 2022 and 2023, however this would reduce thereafter. ACO Shackleton assured the Panel that although the recruitment programme was challenging there were no shortcuts being taken when it came to the vetting process, or that transferees were not rigorously vetted and checked.

It was noted that with a large influx of officers over the past 2 years that 75% of officers who were on front line response had less than 3 years' service. This resulted in many tutor officers themselves having less than 5 years service. The Constabulary were introducing a Tutor Constable Programme which would see 49 tutors forcewide. The programme would ensure that the tutors were full aware of the responsibility and what was required to develop new student officers.

In response to a member's question the Director of Corporate Services advised that there had been 35 resignations from PQF programme, of which it was a 50/50 split of male and female during the last 24 months. There had been some resignations from earlier cohorts. The Panel asked that future reports identify what the attrition rate was across the force and particularly in relation to newly recruited officers. This information should also include gender and ethnicity.

Support for student officers had been developed to enable them to manage their caseloads and provide academic support throughout the probationary period and beyond. If necessary their training could be extended to ensure that officers were confident and were retained.

In relation to force sickness there had been an overall 4% absence during the last six months. The number of identified COVID related sickness had also decreased but this could be attributed to the time of year and that formal testing requirements were no longer in place. There had been 62 stress related referrals which had been raised with the Health and Safety Committee. This had been attributed to shifts and it was hoped that the new shift pattern would alleviate the issues. Managers were now required to carry out a stress risk assessment to enable tailored support to be provided. The services of a psychological company could be provided which was beneficial to officers but did come at an additional cost. The Constabulary were looking at Occupational Health services and what support functions could be provided, including specialist screening and a wellbeing programme. The Panel indicated that young in service officers would be an area for further work.

AGREED; that,
(i) the report be noted;
(ii) future reports identify the attrition rate across the force including gender, ethnicity and length of service.

44. STAFF GRIEVANCES

Prior to the meeting the Panel had carried out a review of the case which had been finalised during the previous 6 months. There had been no issues identified with how the Constabulary had dealt with it.

The HR Manager briefed the Panel on the contents of the report and advised that a number of grievance cases were due to be finalised and that these would be reported to the next meeting.

AGREED; that, the report and updates be noted.

45. CONSTABULARY'S CONSCIOUS INCLUSION ACCREDITATION PROGRAMME

The introduction of the Inclusion Hub in early 2020 had identified a gap within the Constabulary regarding inclusion. The Learning and Development department was currently working to deliver the national Uplift recruitment programme which left limited capacity to deliver further inclusion training to the remainder of the force.

Work had been carried out to benchmark against other forces and it was found that commissioned bespoke training had been utilised by some, however this was an expensive option. The Constabulary proposed to utilise Anti-Racist Cumbria to understand the history and experience of black people with policing. Recent HMICFRS reports had identified a number of recommendations nationally relating to disproportionality which the force was looking to address.

The Panel asked that they received an update report to their February 2023 meeting identifying the next steps and progress being made.

AGREED; that,
 (i) the report be noted; and
 (ii) an update report identifying the next steps and progress being made be provided to the February 2023 meeting.

46. 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 this was the first report since coming into the department and she wanted to develop it further to make it more meaningful for the Panel. It was important to look at the context behind the performance figures such as complainant characteristics and was there any disparity in how they were handled. Service recovery officers were now in place to deal with complaints at an early stage, however often there was a gap in complainants being provided with an update. Information regarding officers and staff should include length of service and the caseload of officers not being able to respond to a complainant.

The Constabulary's Prevent and Deter officer was working closely with the Learning and Development Department to ensure that officers were receiving appropriate training and support. Officers within the Mobile Support Group were now becoming more involved in incident attendance. However, these were proactive officers and provided support to response officers which may result in an increase in complaints.

The members asked that future reports identify the risks and what the force were doing to address them. T/Chief Superintendent Bird proposed that a terms of reference be drawn up to enable future reports to meet their needs whilst remaining dynamic for future change.

Prior to the meeting the Panel had carried out a dip sample of public complaint, complaint review and misconduct cases. As part of this session the Panel had sampled some cases which related to officers who were young in service, some of which had been found to be very positive. Providing feedback in a timely manner had been an issue with some of the Service Recovery cases and this had been fed back to Chief Inspector Wilkinson at the time. One of the complaint review cases had been upheld and the Panel asked that they be able to review the case again at the next dip sample to ascertain what actions the Constabulary had taken; with an update to be provided to the February meeting

AGREED; that,
 (i) the report and updates be noted;

- (ii) an update on the case identified by the Panel be provided to the February meeting; and
- (iii) terms of reference be developed and be shared with the Panel for comment for future report content.

47. 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 and some Use of Force incidents. The Chair provided feedback on what they had seen and reported on the value of Body Worn Video footage. The Panel asked 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 asked whether or not it was an option to change from the national agreement. T/Chief Superintendent Bird advised that he would raise the issue with Superintendent Kennerley who held the portfolio for BWV within the force.

As part of the Use of Force dip sample some cases had involved the use of TASER. The Panel were pleased to note that their recommendation that any incident involving the discharge of TASER should be reviewed by a senior officer had been implemented. They commented on how well the use of TASER had been used and the very good aftercare to the individual after the TASER had been discharged.

AGREED; that, the

- (i) dip sample feedback be received; and
- (ii) matter of audio within the first 30 seconds of footage be raised with Superintendent Kennerley and an update be provided to the Panel in February 2023.

48. 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 30 March 2022 the OPCC had received 49 complaint review requests, illustrating a 22.5% increase compared to the same period in 2021. An average of 12% of the review requests received were upheld. The Panel asked that any identified areas of learning be included within future reports.

From 1 January to 30 September 2022, the number of QSPI's received by the OPCC had risen to 452, an increase on average 25% year on 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. Of the police service dissatisfaction matters over 20 related to firearms licensing, predominantly about the length of time being taken for licence renewals. T/Chief Superintendent Bird advised that the length of time had now reduced from 15 months to 11 months. He explained to the Panel the reasons behind the backlog including COVID sickness and absence and the inability to carry out suitability checks for nearly 2 years. The department currently had a paper-based system which led to inefficiencies. A case management system was being introduced and over 10,000 paper records had been scanned which would allow remote access. With the new system everything could be submitted and accessed electronically speeding up the process. It was noted that as part of the process an applicant would require a doctor's assessment which often held up the process.

Anyone who required a firearms license for work was being prioritised. A Constabulary Gold Group was still running and overseeing the progress of the application renewal and case management system implementation. Two additional staff were being recruited to provide a longer and more sustainable model within the department once the backlog had been dealt with.

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 was 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;
- (ii) any identified areas of learning in relation to complaint reviews be included within future reports; and
- (iii) future QSPI reports include outcomes of success and how these are measured.

49. 2023 MEETING DATES AND ANNUAL WORK PROGRAMME

A draft of the 2023 work programme and meetings dates were provided to the Panel. In addition to the cyclical work of the Ethics Panel a discussion was held on what areas of business they could look at as part of the Thematic review work and a number of topics were discussed. These included –

- Comms Centre re 101 live chat and digital media. Listening to calls to ensure the victims code was being adhered to and any relevant crime prevention advice was being given.
- Vetting process – dip sample of vetting decisions against the HMICFRS report

With the Police and Crime Commissioner becoming the Fire and Rescue Authority from the 1 April 2023 some areas of business may be added to the Ethics Panel's future work.

Agreed; that, the proposed areas be included within the Panel's 2023 work programme

Meeting ended at 4:45 pm

Signed: Alan Rankin
Panel Chair

Date: 03.11.2022



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Violence Against Women and Girls



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- The term ‘**Violence Against Women and Girls**’ refers to acts of violence or abuse that we know **disproportionately affect women and girls**.
- Crimes and behaviour covered by this term include rape and other sexual offences, domestic abuse, stalking, ‘honour’-based abuse (including female genital mutilation, forced marriage, and ‘honour’ killings), as well as many others, including offences committed online.
- While we use the term ‘violence against women and girls’, this refers to all victims and survivors of any of these offences



Report **online**



www.cumbria.police.uk



[cumbriapolice](https://www.facebook.com/cumbriapolice)



[cumbriacops](https://www.instagram.com/cumbriacops)

Always call **999** in an emergency



I have often referred to 2021 as a ‘watershed moment’ for both society and policing. Events of the past year, combined with women’s longstanding concern that the criminal justice system does not protect them or bring them justice for violent and sexual crimes, has led to a serious loss of trust in the police. The pandemic has also shone a light on the terrible reality for many women and girls behind closed doors.

Maggie Blyth

NPCC VAWG Outcomes and performance framework

April 2022



Report online



www.cumbria.police.uk



cumbriapolice



cumbriacops

Always call **999** in an emergency

Violence Against Women and Girls (VAWG)

Key Achievements 2022



- New governance structure and dedicated tactical lead and operation lead established in role.
- 59 VAWG champions in force recruited and providing operational support
- Publication of VAWG Strategy

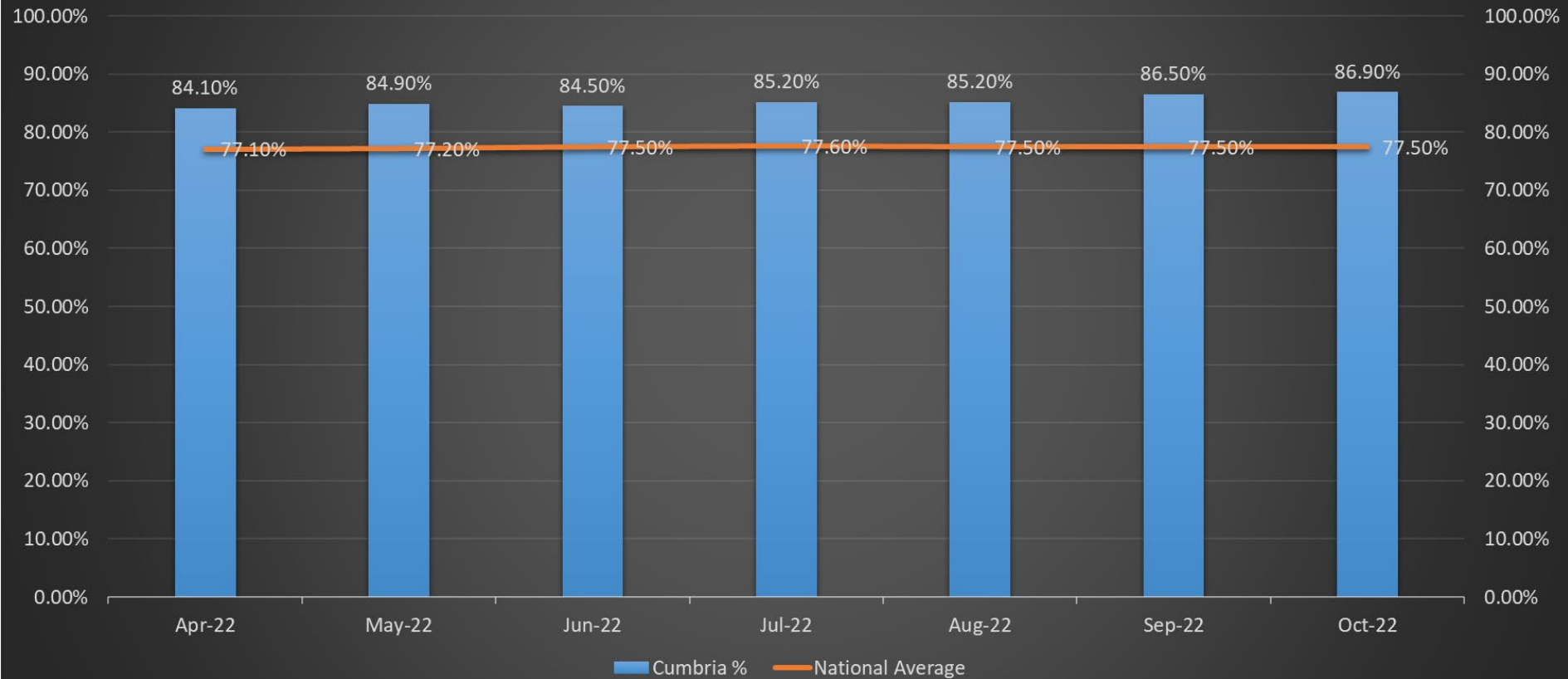
- Victims charitable trust scrutiny panel. TOR agreed and themed reviews with a victim focus conducted quarterly.
- Report written regarding review into outcomes for VAWG offences following data check on crimes where victims decline to prosecute

- National and regional VAWG conference attended by Tactical lead and champions for best practice learning.
- NW regional VAWG group set up for sharing of practices

- VAWG lesson plan being delivered to student officer training and operational Sgts and Insp.
- Further training to be provided to operational officers in area in 2023.
- Training delivered to relevant partners from witness care, probation and health.
- Womens centres in Cumbria working with VAWG champions

- Media campaign continues with VAWG linking into all Media messages.
- Monthly VAWG media on the 3 pillars planned for each month
- CUMBRIA POLICE WERE NUMBER 1 FOR VAWG CONVICTION RATES FOR 6 MONTHS RUNNING

VAWG Offences



STRATEGIC LEAD -
Detective Superintendent Blaiklock

DCI Head of RASSO/VAWG -
DCI Coombes

TACTICAL LEAD -
Detective Inspector Belshaw

**VAWG
CHAMPIONS**

OPERATIONAL LEADS

Safer Spaces

Restore public
trust and confidence

Relentless pursuit
of perpetrators

WOMENS SUPPORT CENTERS

**Barrow Women's
Community
Matters**

**Carlisle's
Gateway for
Women**

**Women Out
West**

TRAINING

Victim support leaders	04/11/22
Victim support – North	02/11/22
Victim Support- West	16/11/22
Victim support- South	24/10/22
Probation Leaders	04/11/22
1 set of students Officers D22	01/08/22
1 set of ICIDP students	10/11/22
All PSD staff	03/11/22
5 weeks of Sergeants and Inspectors	1 st Nov-5 th December
All NPT Staff	11/10/22
4 Workshops at Carlisle College during Be Safe, Stay Safe Day	30/11/22

Training in 2023

Ongoing Sgts VAWG Training

Front line officers VAWG Training

Ongoing Student officer training

Ongoing ICIDP officer training

Development of primary school VAWG Training- incorporating the mini police as champions

Development of secondary school VAWG Training- work ongoing with the PSHE syllabus

Development of Asylum Seekers and refugee training

SAFER SPACES CASE STUDY

Thelkeld Railway walk

In September 2022 a reporter contacted Cumbria Police regarding an incident they had been made aware of whereby a lone female was approached on a secluded Path

'She was walking alone toward the Threlkeld Railway walk when the male cyclist stopped her asking her out for dinner. She refused saying her husband was coming, and he continued trying to talk to her commenting how lucky her husband was to have her.

She felt very frightened and called for her son to come and meet her.

Her husband was running ahead of her and when she told him he said the man had done the same with another woman further up but he thought they were just talking'

Thelkeld Railway walk Case Study

This incident saw a seismic change in the way that we handle and deal with VAWG incidents from the frontline, to the messages we put out to the women and girls of Cumbria via our media unit.

No longer do we solely give public safety information such as women should walk in pairs, carry a fully charged mobile phone, alert someone when they have got to their destination- instead we go directly to the root cause of the situation which is male inappropriate behaviours towards women and girls.

The press release was directed at men- it challenged them to consider their behaviour towards women, and called for self reflection about how behaviours might be perceived.

The message was also reiterated in the area newsletter that has a readership of over 7000.

Thelkeld Raily Walk Case Study

Thelkeld railway walk is added to a patrol plan and deemed a hotspot area for VAWG Offences- utilising NPT officers and the busybeat app

DI Belshaw has now met with the Mayor of Keswick and members of the council to plan for better lighting along the route to minimise the fear of violence suffered by women and Girls- following reports from schoolgirls to the council suggesting they were scared to use the pathway.

Crime Prevention were also in attendance of this meeting and are preparing a report into sustainable and relevant methods to better light the walkway to support the councils' bids for better lighting against the national parks suggesting darker skys and wildlife could be affected

A meeting has been set up with the National Parks (who own the pathway) to discuss funding and working together in conjunction with the police and Keswic Council.

Violence Against Women and Girls (VAWG)

Whats Next?



- RASSO – rape and serious sexual offences strategic lead will be working alongside VAWG team. Enhance service supporting victims from point of contact through the CJ system.

- Schools VAWG educational program
- Refugee and Asylum Seekers educational program
- GWEN
- Focus on Safer Streets and Partnership working to develop safe space

- Single Online home – national build for national website this will include a VAWG reporting page. It will aim to cover, Claires and Sarah's law, street safe, rasso, DA. Cumbria starts SOH from Nov 2022

- Preparing for HMICFRS inspection
- Call It Out campaign
- APSP and VAWG training video

- In depth review of VAWG Action plan with Ops leads

Ethics and Integrity Panel



Cumbria Constabulary Information Management Compliance

Date: 30th January 2023

Agenda Item No: 08a

Originating Officer: Kathleen Riley and Lesley Johnson

Executive Summary:

As a public authority, Cumbria Constabulary is required comply with the requirements of the Freedom of Information Act 2000 and respond to information requests within the statutory timescale. As a Data Controller, the Chief Constable is also required to process personal data lawfully and respond to 'subject access requests' within the statutory timescales specified within the Data Protection Act 2018.

This report provides an update on the levels of compliance achieved by the Constabulary in respect of responses provided to freedom of information and subject access requests.

Recommendation:

That the members of the Panel note this report.

1. Introduction and Background

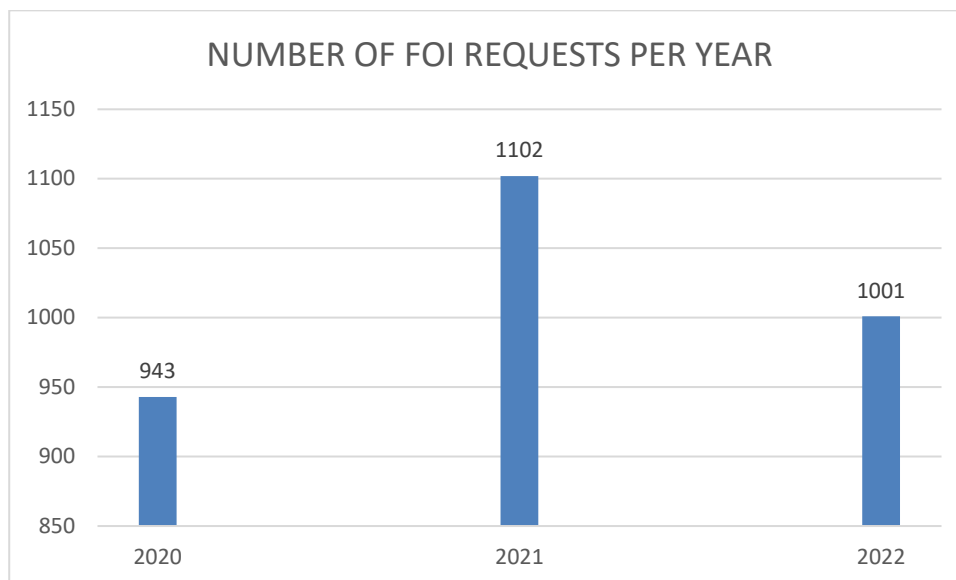
- 1.1 As a public authority, Cumbria Constabulary is required to comply with the requirements of the Freedom of Information Act 2000. These requirements include the right of an individual to ask whether specified information is held by the Constabulary and, if that is the case, to be provided with that information, subject to the applicability of relevant exemptions. With limited exceptions, the Act requires that a response to a request is provided within 20 working days of a request being received.
- 1.2 The Chief Constable, as Data Controller for Cumbria Constabulary, is also obliged to ensure that Cumbria Constabulary complies with the requirements of the Data Protection Act 2018. These requirements include a provision for an applicant to request access to personal data which may be held about them. A response to a 'subject access request, as the right of access is commonly known as, is required to be provided within 1 calendar month, although this can be extended in limited circumstances by a further 2 months.

- 1.3 The Information Commissioner has indicated that an acceptable level of compliance for public authorities to meet, for both freedom of information and subject access requests, is 90% of requests closed within the statutory timescales.
- 1.4 The Information Management Team, which forms part of the Digital, Data, and Technology Command, is responsible for receiving, recording, collating internal responses and responding to freedom of information requests and subject access requests, received by the Constabulary.

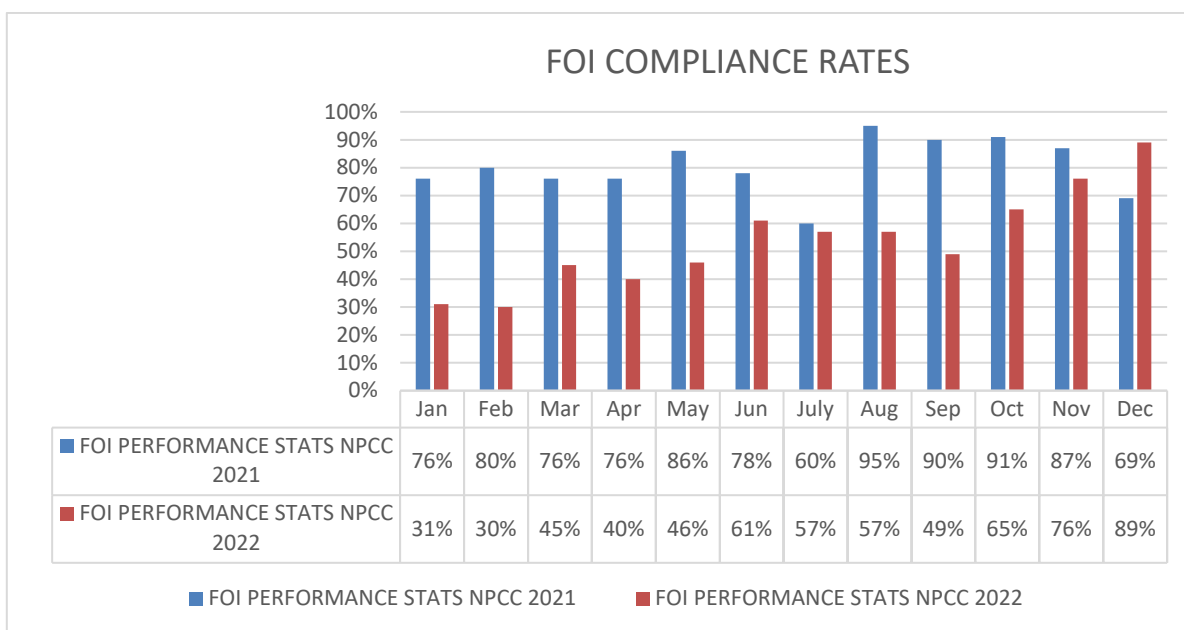
2. Issues for Consideration

2.1 Freedom of Information Requests (FOI)

- 2.1.1 A total of 1001 Freedom of Information requests were received in 2022, a reduction of 101 from 2021.
- 2.1.2 The chart below shows the number of FOI requests received per year for 2020, 2021 and 2022.



- 2.1.3 Over the course of 2022, compliance with the 20-day timescale has fluctuated. Considering the abstractions required to further enhance training amongst new team members following the Information Management programme of change, this level of performance was expected. However, there has been a noticeable improvement in performance recently, as individuals have become more skilled, and a temporary FOI expert has contributed to an improvement in internal policies and procedures. Compliance is steadily improving, as shown in the chart below.

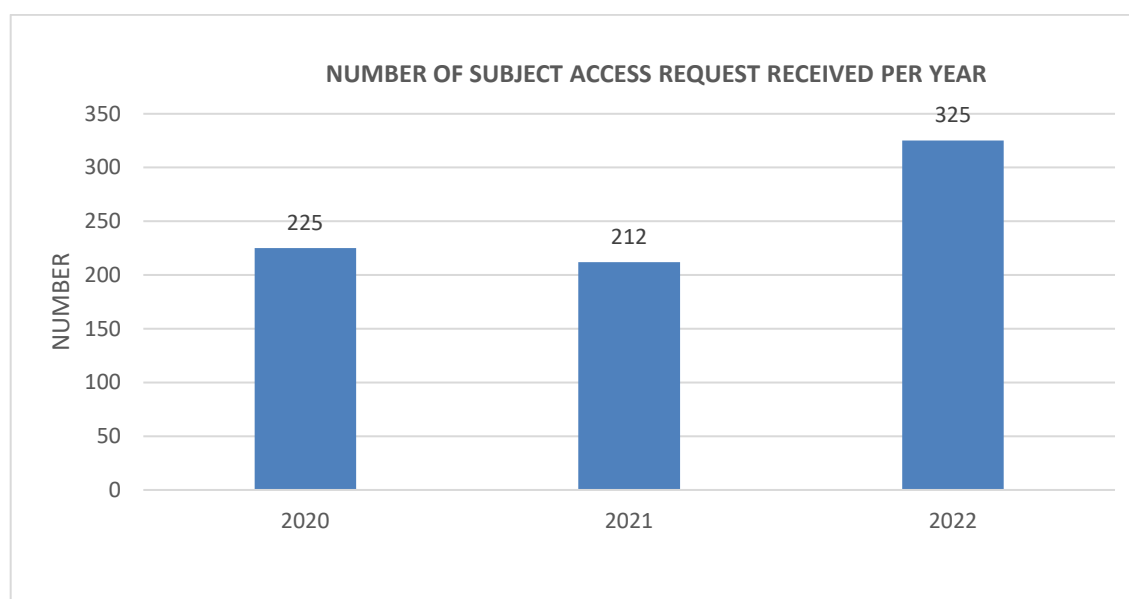


2.1.4 Based on the results from all police forces in England and Wales for the year ending 2022, 74% of requests were completed within 20 working days on average. At the end of 2022 Cumbria Constabulary reported a compliance level of 89%, a significant improvement to the 31% reported at the beginning of the year.

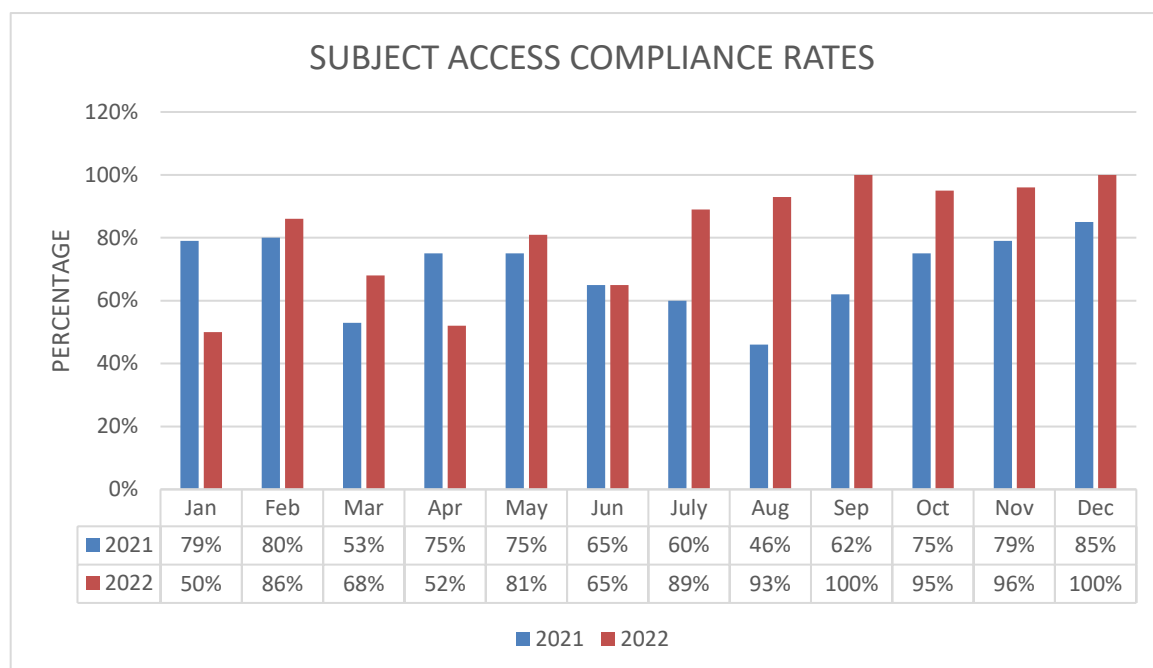
2.2 Subject Access Requests (SAR)

2.2.1 A total of 325 Subject Access Requests were received in 2022, a substantial increase of 113 from 2021.

2.2.2 The chart below shows the number of SAR requests received per year for 2020, 2021 and 2022.



- 2.2.3 In the first half of 2022, compliance over a one-month period fluctuated. This level of performance was expected given the abstraction required to further improve the training of new team members following the information management change program. However, as you can see from the image below, there have been significant improvements and we continue to deliver a consistently high level of performance.



- 2.2.4 Based on the results from all police forces in England and Wales for the year ending 2022, 76% of requests were completed within the statutory one-month period on average. At the end of 2022, Cumbria Constabulary reported 100% compliance for the month of December, a significant improvement since the beginning of the year.
- 2.2.5 The Constabulary continue to receive requests from officers and staff. Even though the number of these requests remains relatively small, the time taken to process them is generally high, such requests tend to be more time-consuming and complex than requests from members of the public. Requesting access to video and/or audio recordings (such as body-worn videos) can also take a disproportionate amount of time.
- 2.2.6 The goal of the Publication Scheme, which the Constabulary is required to implement, is to notify the public of the information that is easily accessible and make it simple to obtain.

We now have a more effective service for the general public to make a SAR/FOI request thanks to the ongoing rollout of a redesigned website using the “Single On Line Home” platform. Ongoing recommendations and improvements include proactive website disclosure of FOI compliance as well as publication of datasets and material as required by the Publication Scheme to improve compliance with s19 of the FOIA. This project is expected to be finished within six months.

3. Other Considerations

3.1 The Data Protection and Digital Information Bill

3.1.1 The Data Protection and Digital Information Bill (Data Reform) was published on Monday 18th July 2022. This Bill is intended to update and simplify the UK's data protection framework with a view to reducing burdens on organisations while maintaining high data protection standards

3.1.2 It has been nearly 5 years since the EU General Data Protection Regulations applied to the UK, as supplemented by the Data Protection Act (DPA) 2018. Since then, the UK has left the EU and the UK GDPR introduced. The Bill was scheduled to have its second reading in the House of Commons on Monday 5th September. However due to the changes in leadership in the Government around that date this did not take place and we await clarification of the progress of the Bill with a further date to be announced for the second reading.



Professional Standards Department

Ethics and Integrity Panel Report

2022/2023 Q3

January 2023

T/DCI Hayley Wilkinson – Head of Professional Standards

Hannah Pocock – Force Intelligence Analyst, Anti-Corruption Unit

Tracy Caldwell – Force Intelligence Analyst, Anti-Corruption Unit

OFFICIAL – SENSITIVE

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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 3 (Q3), 01/10/2022 to 31/12/2022. Figures in this report are correct as of 01/02/2023.

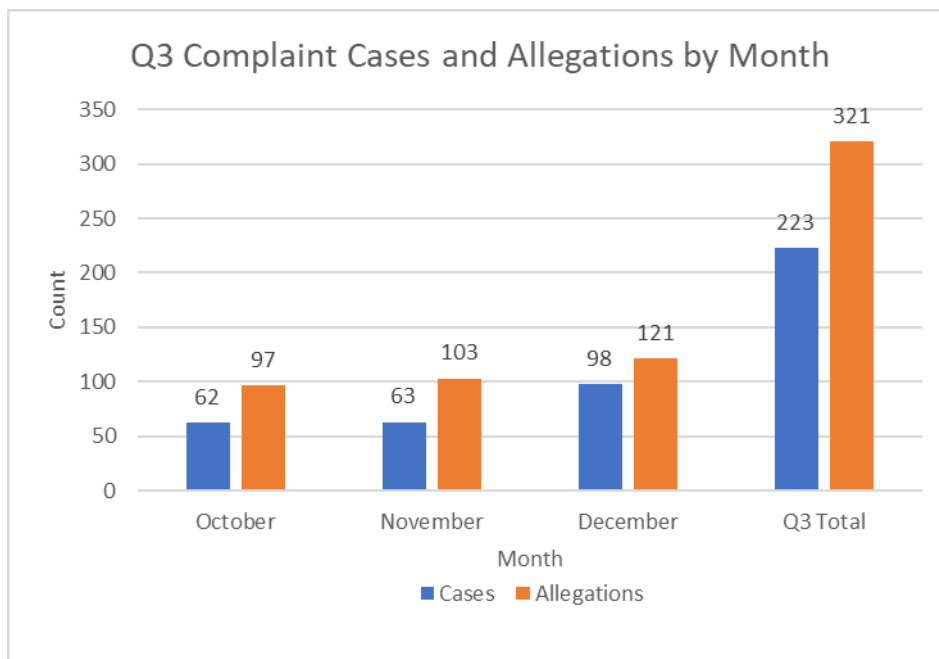
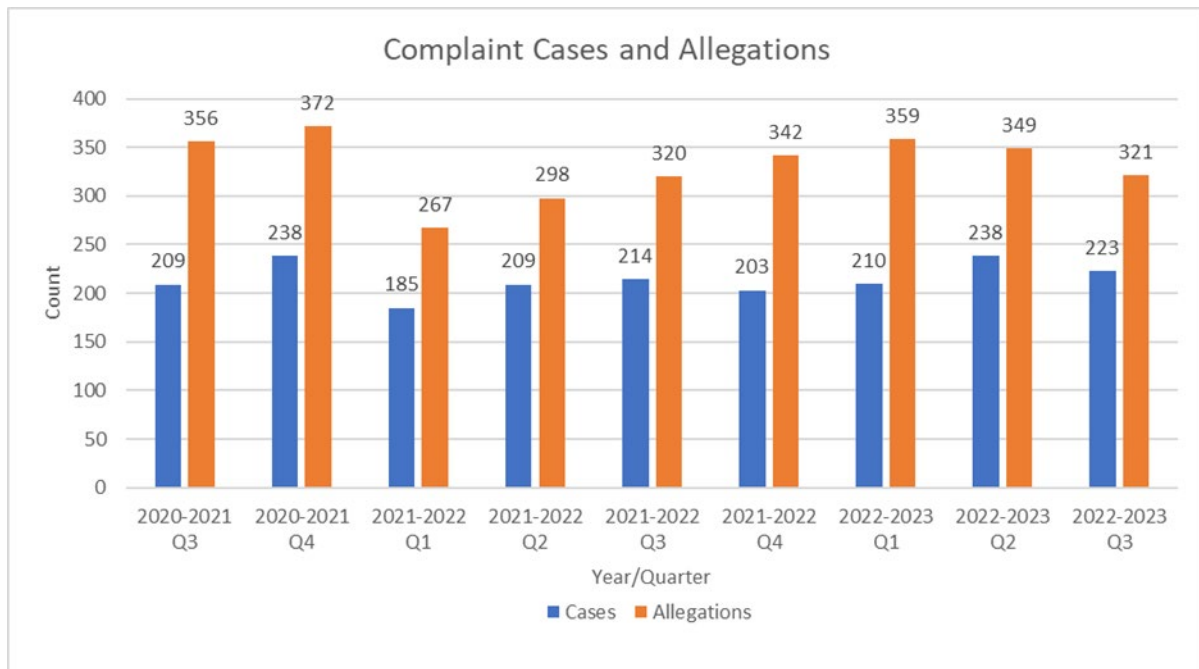
Conduct, Anti-Corruption Unit Intelligence, and certain commentary within the Public Complaints sections are not for publication. Please consult with the Head of Professional Standards prior to publishing any of the contents of this report.

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.

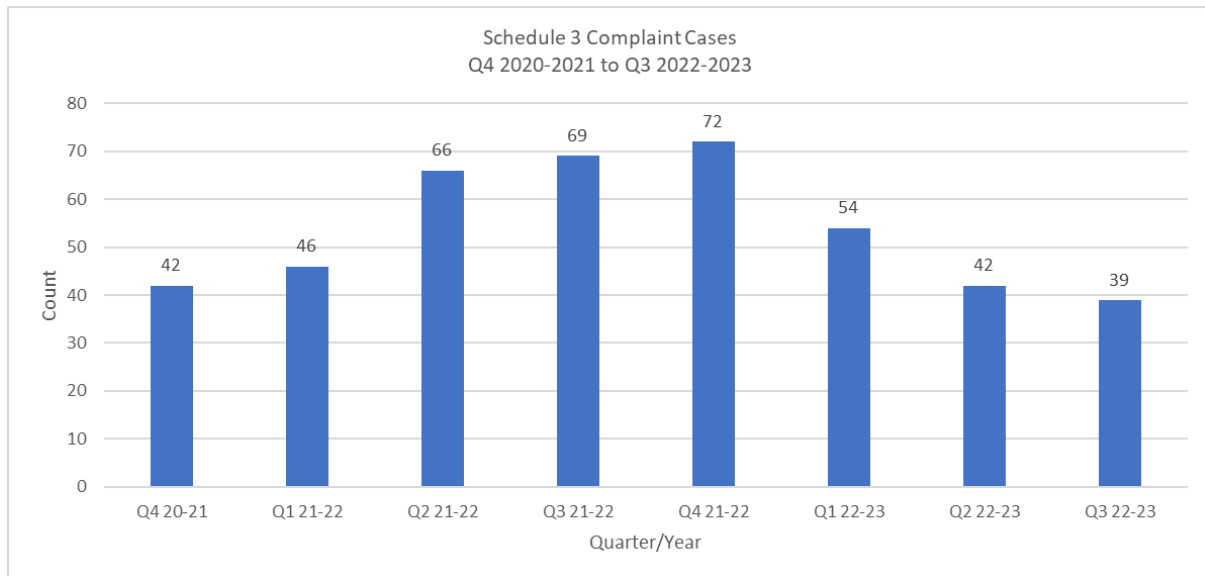
Public Complaints

Complaint cases have decreased in Q3 when compared to Q2, cases have decreased 7% and allegations 9%.



Figures are reasonably consistent to Q3 2021/2022 with 1 additional allegation and a small increase in cases of 4% (9 cases) in 2023 compared to 2022. Complaint cases are just above average and allegations just below average compared to the last two years of data ([Appendix A – Chart A1](#)). The decrease in complaints, albeit not to the same extent, broadly follows the overall decrease in incidents (-13%), crimes (-13%) and custody (-1%) during Q3 compared to Q2 ([Appendix C](#)). The increased

number of complaint allegations and cases logged/recorded in December ([Appendix A – Charts A2 and A3](#)) is due to administrative capabilities during Q3.



There has been a slight decrease in the number of Schedule 3 cases in Q3, but not as significant as from Q1-Q2. They are at the lowest in 2 years with the reason appearing to be less cases being recorded due to *Severity of allegation (Para 2(6B))* ([Appendix E](#)).

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.

Contact Days (Case Received to Initial Contact)

Q3	October	November	December
0-5 days	1	2	6
6-10 days	12	5	6
11-20 days	29	12	15
21-30 days	7	25	8
Over 31 days	8	22	4
No Initial Contact Date Recorded	11	15	37

Days taken to log Complaint (Case Received to Case Logged)

Q3 (Including De-Recorded Complaint Cases)	October	November	December
0-5 Days	61	44	76
5+ Days	3	24	23

A total of 206 cases (89.18%) of cases were logged within 7 days of having been received. The remaining 25 cases (10.82%) were logged after 1 week of having been received, 19 cases within 14 days or less and 5 cases over 2 weeks with the longest being 34 days.

Average Finalisation Times of Cases Logged/Recorded and Finalised

	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 <i>(Including De-Recorded Cases)</i>	30 <i>(Including De-Recorded Cases)</i>

Time taken to log a complaint started off well in October but has been much longer in the latter two months of Q3. December has seen a drive to reduce the backlog of cases awaiting logging hence the increased number of cases logged in the final month of Q3.

The time taken to finalise complaint cases in Q3 has significantly increased from previous quarters, however, is akin to Q1 2021/2022.

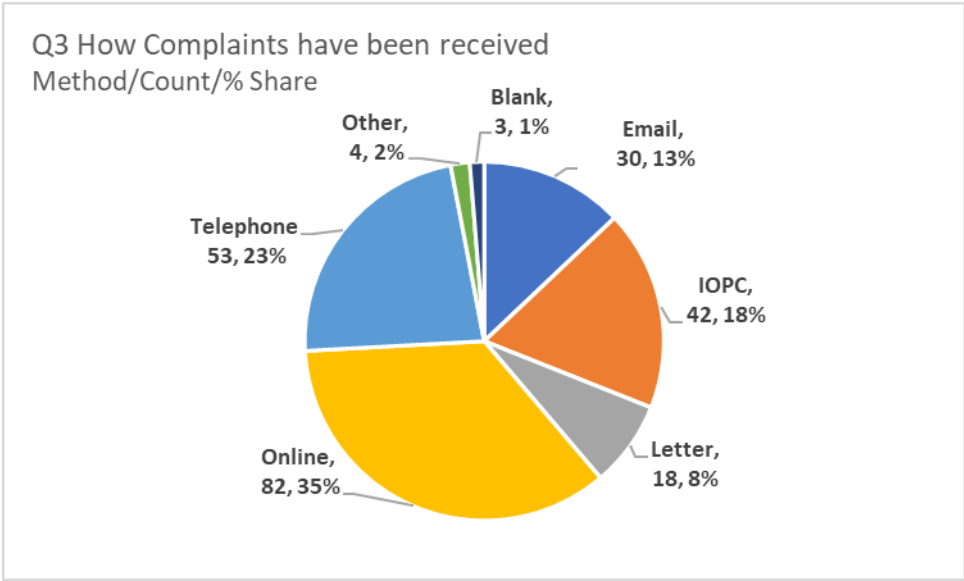
The number of Q3 complaint cases logged and finalised and logged and still Live at the end of Q3 is around a 60/40 split. This is a shift from previous two thirds Finalised and one third Live split ([Appendix F](#)).

In Q3 we employed a PSD police volunteer to help with admin and service recovery one day a week.

There is work ongoing to streamline and standardise complaint handling processes.

Complaints Received

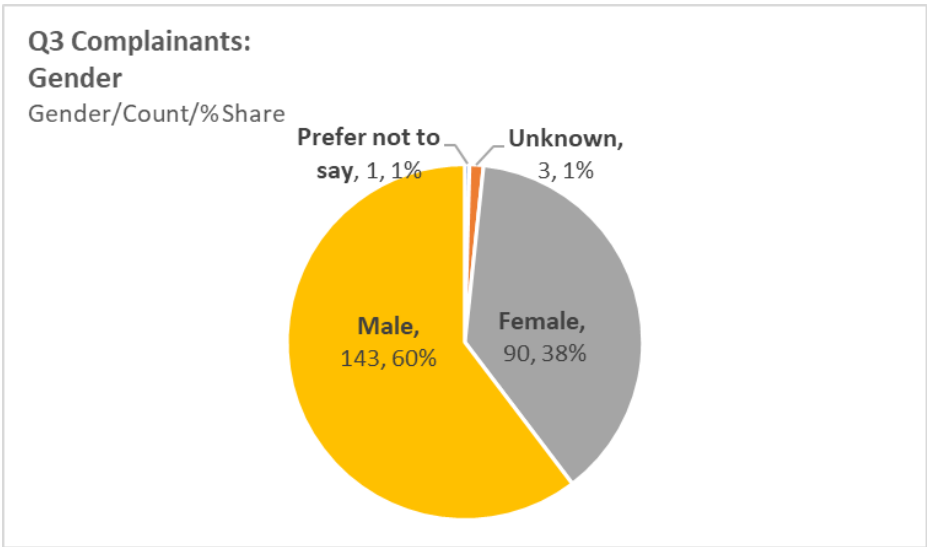
During Q3, 231 complaints (including De-Recorded) were received through various routes, although Online complaints were the most common.



The single online home form for reporting complaints went live in October 2022

Complainant Characteristics

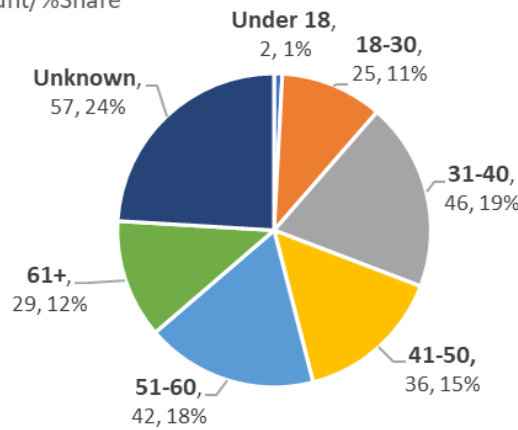
From the Complainant Characteristics data available, complaints are more likely to be submitted from Males rather than Females. At least half of Complainants are White and are most likely to be over 40 years old.



Q3 Complainants:

Age

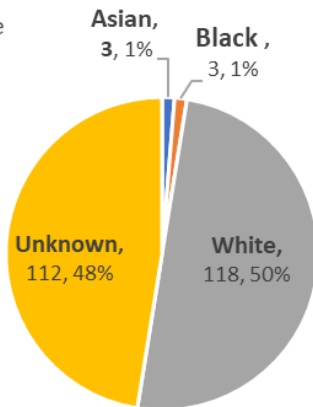
Age Range/Count/%Share



Q3 Complainants:

Ethnicity

Ethnicity/Count/%Share



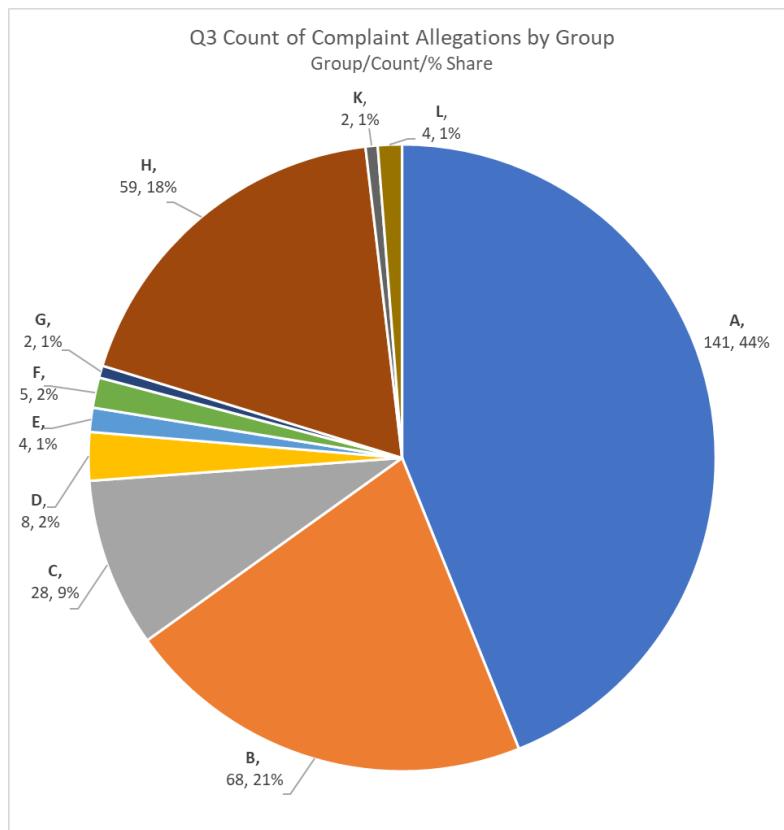
See [Appendix D](#) for breakdown of *Complainant Ethnicity: Self Classification*.

Currently the age of complainants is unknown in a quarter of cases and their ethnicity in nearly half. Single online home went live in October 2022, which requests complainant protected characteristics and it is hoped that these figures will improve in at least 1/3 of cases (35% of complaints are submitted online as noted earlier in the report).

It is now a performance indicator for service recovery complaint resolution case handlers to consistently ask what a complainant's self-classified ethnicity is.

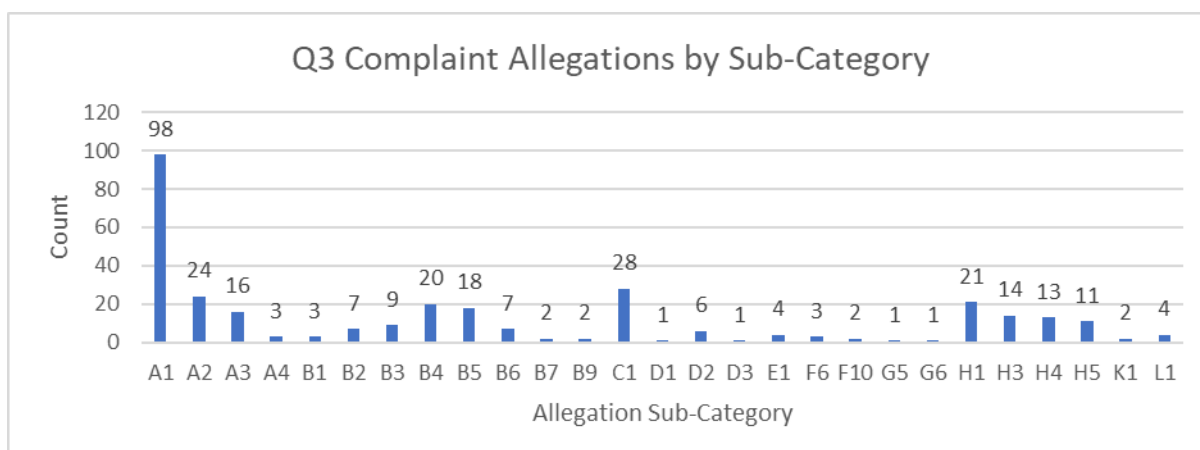
Complaint Allegations

Complaints continue to fall under the two most common complaint groups, *Group A – Delivery of duties and service* and *Group B – Police powers, policies, and procedures*.



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

Both Group A and Group B allegations have decreased in line with the overall decrease of complaints in Q3 compared to Q2. *Group H – Individual Behaviours complaints* are again the third most common types of complaint made but they have seen a greater decrease of 15.25% compared to Q2 and are at their lowest for least the last 4 quarters. *Group C – Handling of or damage to property/premises* has however continued to rise from the previous rise seen in Q2, with an overall increase of over a third in Q3 compared to Q2, the highest for this financial year ([Appendix B, Chart B1](#) and [Chart B2](#)).



Group C is the only Group to see an overall increase in allegations which opposes the overall decrease in allegations in Q3.

Group C – Handling of or damage to property/premises

	Q4 21-22	Q1 22-23	Q2 22-23	Q3 22-23	% Change Q2 to Q3
Group C	19	9	18	28	35.71%

The increase in *C1 Handling of or damage to property/premises* allegations appear to primarily relate to mobile devices having not been returned post NFA of a criminal case. A total of 18 officers are known subjects of a selection of these cases, with one officer noted on two cases. The most common length of service of officers linked to these cases is 3-5 years (7 officers).

Despite decreases in Groups A and B allegations, in particular, allegation types *A4 General Level of Service* (-233%), *B7 Evidential Procedures* (-150%) and *B9 Other Policies and Procedures* (-400%), there have been increases in certain allegation types within both of these two groups. Namely *A2 Decisions* (+37.5%, 9 extra allegations compared to Q2) and *B5 Detention in Custody* (+66.67%, 12 additional allegations compared to Q2).

A2 Decisions

Of the 24 allegations *A2 Decision* allegations making up 21 cases in Q3, over half relate to National Factor: Investigation due to cases being finalised as NFA. This correlates with the rise in *C1* type allegations which concern the return of property following a case being deemed NFA. Of the 21 cases, two thirds of the cases have known officers as subjects, the majority (10) being officers with 0-2yrs service.

See Organisational Learning regarding NFA cases.

B5 Detention in Custody

There were 15 cases with 18 associated *B5 Detention in Custody* allegations made in Q3. These are spread across the custody suites and concern a variety of allegations such as being denied food, rights, medical or mental health care and do not correlate with one issue. Four cases are Resolved, with the remainder still Live which includes 4 Schedule 3 cases. Of the 15 cases, known officers are noted on only 2 cases therefore no commentary is possible as to the characteristics of subjects of *B5* complaint allegations.

Group H – Individual Behaviours

	Q4 21-22	Q1 22-23	Q2 22-23	Q3 22-23	% Change Q2 to Q3
Group H	66	67	68	59	-15.25%

The welcome change in Group H allegations is due to the decrease of *H5 Overbearing or harassing behaviours*, down 45.45% compared to Q2.

The decrease in A4 General Level of Service allegations correlates with work done to improve victim care force wide.

Complaint themes will be fed back via command performance meetings and other scrutiny panels, e.g., custody scrutiny panel concerning the increase in B5 allegations.

HMICFRS undertook an inspection of custody in January 2023, and they were provided with complaints data.

There is some work needed to re-configure Centurion for the new BCU structure.

Complaints by Department

Currently unable to report upon as ICT work is required. We expect to be able to report on Department figures in Q1 2023-2024 report.

Referrals to the IOPC

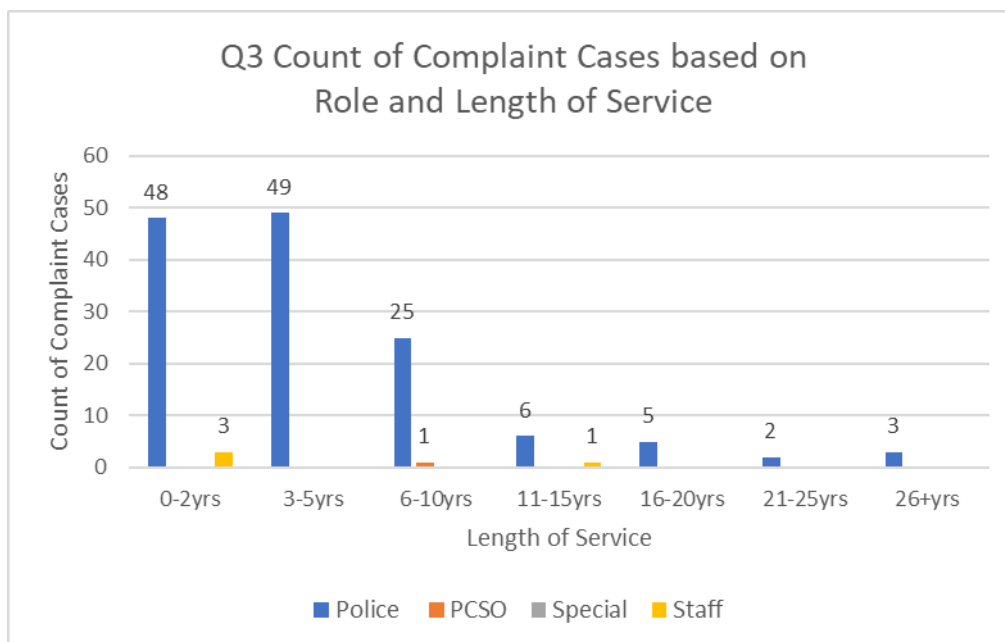
Between October and December 2022, Cumbria Constabulary referred a total of 11 cases to the Independent Office for Police Conduct (IOPC).

Eight referrals were in relation to Death or Serious Injury (DSI) (1 converted to Serious Assault complaint case), 1 additional Serious Assault, 1 Criminal Offence or Discriminatory Behaviour likely to lead to Discipline and 1 Other.

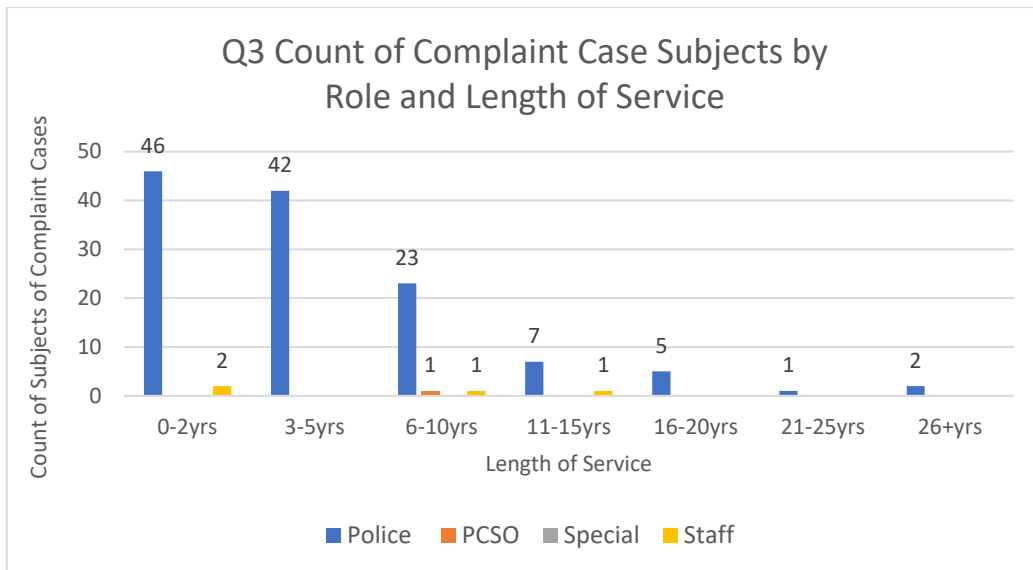
These split into 3 unexplained deaths, 3 attempted/potential suicide attempts, 3 Use of Force, 1 serious injury and 1 potential criminal case. Officers who are noted on these cases have primarily 7 years' service or less.

Length of Service

Where there is at least one identified subject of a complaint case, it is officers with less than 5 years' service, with a reasonably even split between 0-2yrs and 3-5yrs service, who are most likely to be subject of those complaints. The Q3 data below does not include where the subject of the complaint has not been established.



Caveat: If more than one officer with the same role and length of service is linked to a case then they will appear once for that length of service, e.g., Complaint Case 1 has 2 PCs with 1 year service each, this will be counted once on the above chart. Repeat Officers may be counted more than once if linked to more than once case on the above chart.



Caveat: This chart considers individuals linked to a complaint case based on their collar number so on their own merits, therefore, if there is more than one officer with 1 year service linked to the same complaint case then they will both be counted on this chart. In turn, a complaint case therefore may be counted more than once on this chart if more than one individual is subject of a complaint case. Repeat Officers who are subject of more than one complaint case will be counted once on the above chart.

These graphs illustrate that the younger in service an officer is, the more likely they are to receive a public complaint.

Of note, patrol officers are consistently the most complained about department, as they have the most interaction with members of public. Most officers on patrol are likely to be younger in service, as that is where police officers start their careers.

Other Updates and Hot Topics

Organisational Learning

Lessons Learnt in Q3 spanned a variety of topics ([Appendix H](#)). The 12 issued related to 1/3 Individual and 2/3 Organisational with two for Driving and two for Victim Support.

PASS and PSD communications in Q3 have included:

PASS Newsletters

- Stalking and Harassment – Are you providing the correct digital safety advice?
- Avoid the use of Cannabidiol (CBD) Products
- Inappropriate use of batons
- Activation of BWV

Videos presented by DI Gray issued on the Intranet covered the following trending topics in Q3:

- Police perpetrated Domestic Violence and Internal Domestic Violence
- Sexual Misconduct and Data Protection Breaches

Complaints over 1 Year Old

CO/838/20 was sub-judice until court case, which finalised in December 2022, and so now is with the investigator to proceed/complete

CO/172/21 sub-judice

CO/235/21 sub-judice

CO/348/21 sub-judice

CO/54/22 A service recovery not finalised properly – returned to complaint handler

Other Updates

ATA auditable capabilities

PowerBI Dashboard for Centurion data due to be designed in Q4.

National sexual harassment policy and procedures adopted

Appendices

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

Chart A1 Q3 2020-2021 to Q3 2022-2023 Complaint Cases and Allegations

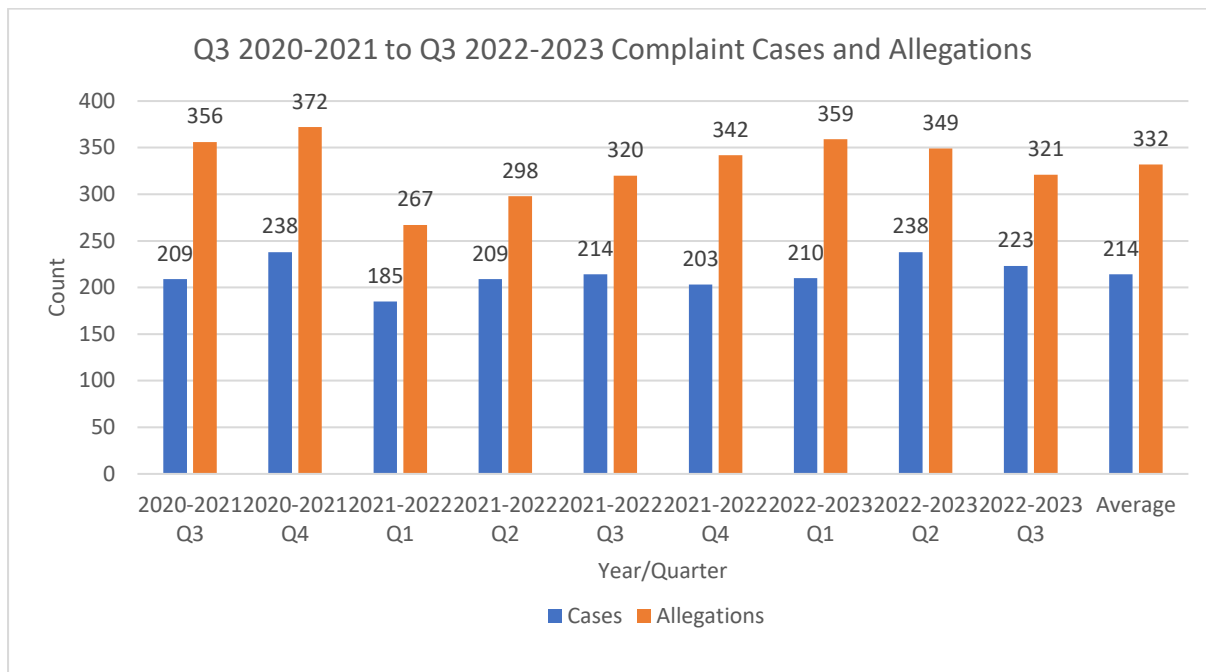
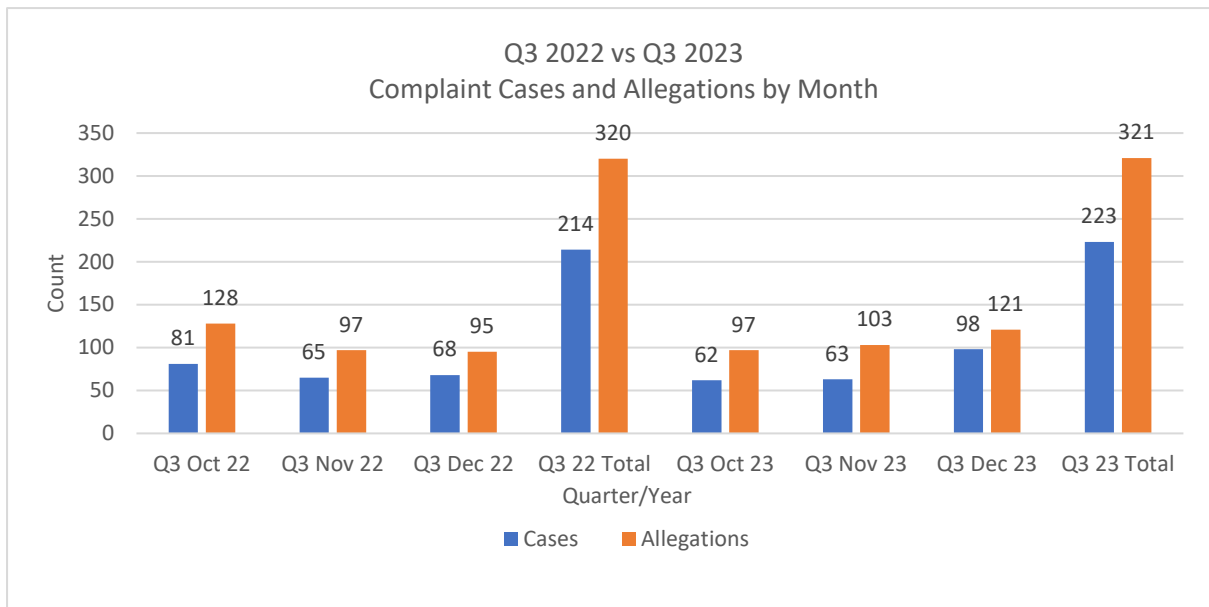


Chart A2 Q3 2021-2022 to Q3 2022-2023 Complaint Cases and Allegations by Month



Chart A3 Q3 2021-2022 (2022) vs Q3 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 Q3 2022-2023

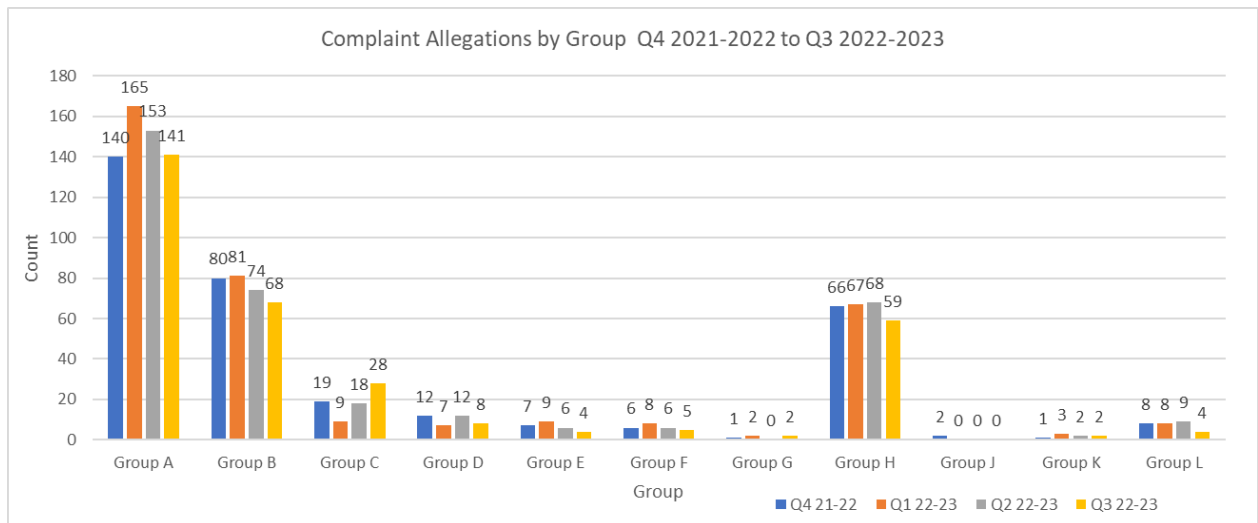


Table B2 Count of Allegations per Complaint Group (excluding De-Recorded) for the previous year

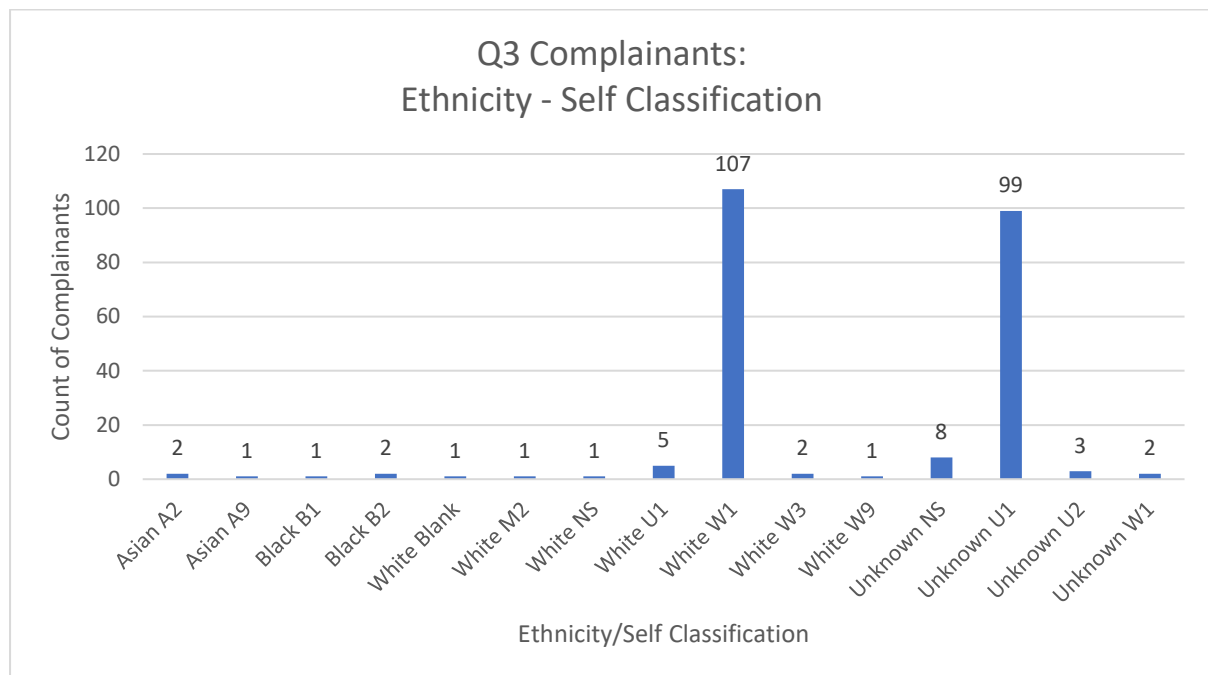
	Q4 21-22	Q1 22-23	Q2 22-23	Q3 22-23	% Change Q2 to Q3
Group A	140	165	153	141	-8.51%
Group B	80	81	74	68	-8.82%
Group C	19	9	18	28	35.71%
Group D	12	7	12	8	-50.00%
Group E	7	9	6	4	-50.00%
Group F	6	8	6	5	-20.00%
Group G	1	2	0	2	100.00%
Group H	66	67	68	59	-15.25%
Group J	2	0	0	0	0.00%

Group K	1	3	2	2	0.00%
Group L	8	8	9	4	-125.00%

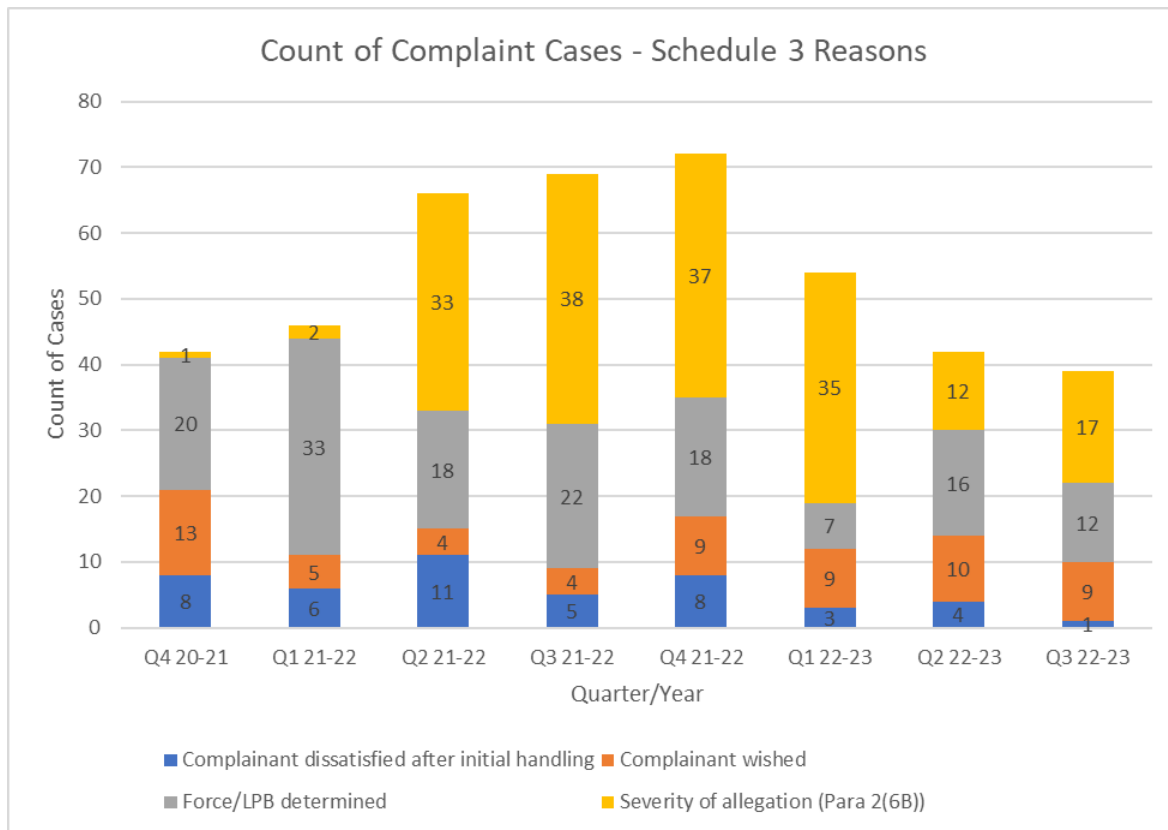
Appendix C – Q3 Incidents, Crimes and Custody Figures

	2022-2023 Q2	2022-2023 Q3	% Change
Incident Logs	24713	21796	-13%
Incident Logs minus duplicates/errors	23668	20876	-13%
Crimes	10346	9185	-13%
Custody: Arrests	2487	2398	-4%
Custody: Voluntary Attendance	896	947	+5%
Custody Total	3383	3345	-1%

Appendix D – Complainant Characteristics



Appendix E – Schedule 3 Reason



Appendix F – Public Complaint Outcomes (as of 31/12/2022)

Complaint Case Outcome	Q2 Count of Cases	Q2 % of Cases	Q3 Count of Cases	Q3 % of Cases
Live	78	32.91%	82	35.50%
Resolved	145	61.18%	134	58.01%
Not Resolved NFA	3	1.27%	1	0.43%
NFA Required	0	0.00%	1	0.43%
Not determined if the service provided was acceptable	2	0.84%	3	1.30%
The service provided was acceptable	1	0.42%	2	0.87%
The service provided was not acceptable	0	0.00%	0	0.00%
Withdrawn	0	0.00%	0	0.00%
De-Recorded	7	2.95%	8	3.46%
Not resolved – Moved to Schedule 3	1	0.42%	0	0.00%
Total	237	100.00%	231	100.00%

Appendix G – Lessons Learnt

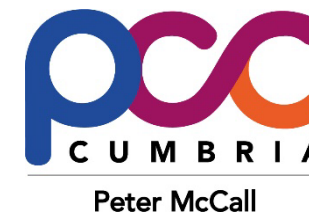
Lesson Ref	Lesson Category	Individual/Organisational	Brief Details and Lesson
546	Victim Support	Organisational	UCLAN Stalking and Harassment PowerPoint uploaded to Intranet to remind/refresh officers of current guidance
550	Detention	Organisational	Custody PS to action re AA being present during charging of a detainee
551	Driving	Organisational	Re-iteration of general driving standards with note of police car going through red light
552	Handling/Sharing of Information	Organisational	MARAC chair to stipulate who each party is if not apparent eg perp, victim. MARAC letter to be reworded which is sent to legal reps
553	Other	Organisational	CCR circulating information in relation to where CCTV is present in the county to assist incidents
554	Other	Organisational	Need to Know article to be issued in relation to dignity of treating deceased individuals
555	Driving	Individual	Driver awareness training
557	Other	Individual	Learning from reflection in relation to attitude of call handler
558	Record Keeping, Record Management	Individual	Use of Force forms policy issued to officers in question as a reminder
559	Victim Support	Organisational	New standard letter template being drafted for NFA cases
563	Other	Individual	Guidance provided to officer in relation to informing others when using BWV
564	Other	Organisational	Yammer Post and shared to BCUs re male officers in control of female subjects

Appendix H – 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

Ethics and Integrity Panel



Title: OPCC Complaints & Reviews

Date: 31 January 2023

Agenda Item No: 12

Originating Officer: Joanne Head

CC:

Executive Summary:

In accordance with the Police Reform and Social Responsibility Act 2011 the Police and Crime Commissioner has a responsibility in relation to conduct and complaints. The introduction of the Policing and Crime Act 2017 and subsequent complaint and misconduct regulations mandate Commissioners to deal with public complaint appeals now known as reviews.

The Commissioner is the appropriate authority for complaints and conduct matters relating to the Chief Constable only. The Chief Constable is the appropriate authority for any complaints regarding police officers (below the rank of Chief Constable) or police staff conduct whilst carrying out their work/duties under the Direction and Control of the Chief Constable.

Recommendation:

That, the Panel notes the current position in relation the number of complaints received by the Office of the Police & Crime Commissioner.

1. Introduction & Background

- 1.1 The Office of the Police & Crime Commissioner (OPCC) receives telephone calls and emails from members of the public who wish to make complaints about police officers and/or police staff under the rank of Chief Constable. As this is a matter for the Chief Constable to deal

with a process has been developed with the Constabulary to forward such complaints onto the Constabulary's Professional Standards Department, advising the complainant accordingly.

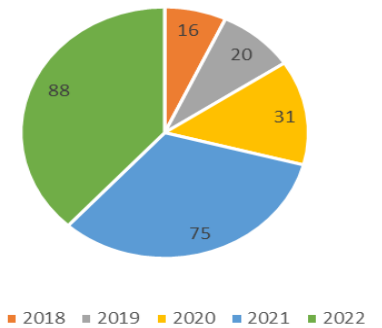
- 1.2 Some issues which are brought to the attention of the OPCC do not constitute a complaint but are regarding quality of service issues. Again, a system has been developed with the Constabulary to pass on the issues to the Chief Constable's Secretariat. The issues are then raised at a local level with the OPCC being kept updated as to progress and advised of either a final solution which has been agreed or a final response which the Commissioner will then send to the author. A separate report is provided to this meeting.

2. Issues for Consideration

Complaints received by the OPCC

- 2.1 This chart details the number of complaints which have been received by the OPCC up to 31 December 2022. The complaints received were all regarding police officers below the rank of Chief Constable and the Police and Crime Commissioner has no statutory responsibility to deal with such matters.

Complaints Received



- 2.2 There is a noted increase in the number of members of the public who are writing to the Police and Crime Commissioner regarding complaints about the Constabulary. This can be attributed to the visibility and increased awareness of the Commissioner's role; and a noted increase in the number of complaints being process by PSD. Where this occurs the OPCC will explain that the Police and Crime Commissioner does not have any statutory authority to investigate such complaint, and it is the overall responsibility of the Chief Constable. Contact details are provided for the Constabulary's Professional Standards Department (PSD) who are the appropriate body to deal with such complaints. If requested, the OPCC will forward the correspondence to PSD on behalf of the complainant.

Commissioner Complaints

- 2.3 Complaints made regarding the Police and Crime Commissioner are dealt with by the Police and Crime Panel (PCP). This Panel has statutory responsibility for holding the Commissioner to account for the work that he carries out and they are therefore the logical body to deal with any complaints. The Elected Local Policing Bodies (Complaints and Misconduct) Regulations 2012 details the role of the PCP.

- 2.4 Any complaint regarding the Commissioner is sent to Cumbria County Council's Monitoring Officer to assess and consider its severity. If it does not meet the above criteria an agreed protocol is in place whereby the Monitoring Officer will correspond with the Commissioner/OPCC Monitoring Officer to ascertain the circumstances surrounding the complaint and provide the complainant with an explanation. If the complainant is satisfied with the explanation such a complaint would be finalised as an informal resolution.
- 2.5 If the complaint cannot be dealt with by informal resolution the PCP will then consider the complaint and may decide to establish a subcommittee to consider the findings of the initial investigation of the Monitoring Officer and consider whether to undertake a more detailed investigation.
- 2.6 Detailed below are the number of complaints regarding the Commissioner, Mr Peter McCall, whereby the OPCC has been requested to provide information to the Police and Crime Panel.

YEAR	N° of Complaints Received	Complaint not about the PCC	Dealt with by informal resolution	Police & Crime Panel investigation
2019	0	0	0	0
2020	0	0	0	0
2021	2	2	2	0
2022	2	0	0	0

- 2.7 During 2022 two complaints were received by the Police and Crime Panel regarding the Police and Crime Commissioner. This is currently being reviewed by the Monitoring Officer. One complaint related to a dissatisfaction by an individual of the outcome of a complaint review rather than their personal conduct. The other was an anonymous complaint which was not within the remit of the Panel or could have been progressed in any event. There are currently no active complaints being dealt with by the Police and Crime Panel.

2.8 Chief Constable Complaints

The Commissioner is the appropriate authority for complaints and conduct matters relating to the Chief Constable. Members of the public may write to complain about the Chief Constable when in fact they are unhappy about the way in which policing is provided or regarding a policy or procedure rather than her personal conduct.

2.9 Changes in regulations mean that where it is apparent that the complaint is not in relation to the conduct of the Chief Constable and may in fact relate to that of officers below this rank, they are then automatically sent to the Constabulary's Professional Standards Department to deal with the issues raised. This would mean that the complaint is not in fact logged with the OPCC. As of 31 December 2022, the OPCC received two complaints against the Chief Constable. Neither complaint was logged as they did not relate to the conduct of the Chief Constable, rather they referred to officers below that rank. They were subsequently re-directed to the Professional Standards Department to be dealt with. The complainants were provide with full details leading to the decision.

YEAR	N° of Complaints Received	Not Logged	Logged	Dealt with by NFA	Investigation	PSD to deal with	IOPC Appeal
2020	4	1	3	4	0		0
2021	4	0	4	2			1
2022	2	2	0	0	0	2	0

2.10 OPCC Staff Complaints

During the 12-month reporting period, two staff complaints were received. Both were investigated and neither were upheld.

2.11 Complaint Reviews

From 1 February 2020, the Local Policing Body became the appropriate authority to deal with complaint reviews relating to cases dealt with as Recorded – No Investigation. The reviews are undertaken by an independent review officer to provide additional independence and transparency to the process.

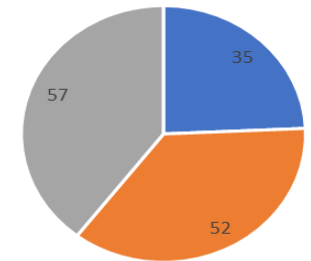
2.12 During 2022 the OPCC received a total of 57 complaint review requests of which six (10%) were upheld. This represents a 9.6% increase from the previous year. Two reviews have been withdrawn and two upon receipt identified that the OPCC was not the Relevant Review Body (RRB).

2.13 Upon the completion of a review the independent review officer will provide a written determination for the OPCC Appropriate Authority to consider. This outlines what they have reviewed, taken into consideration and their final decision. A copy is provided to the complainant upon the conclusion of the review.

2.14 Where the review is upheld, they may provide recommendations for the Constabulary's Appropriate Authority to consider. Within the legislation and statutory guidance, the Appropriate Authority must advise the OPCC and the complainant within 28 days of whether or not they will carry out the recommendations. The Commissioner, nor the OPCC, have any authority to direct or instruct the Constabulary to carry these out. However, as the ethos of the new process is to learn and improve, the recommendations are generally accepted and implemented.

2.15 On average complaint reviews take between 10- 20 days from receipt to finalisation, however this will depend upon the complexity of the matter and staff availability to carry out and administer the review process.

Review Requests



■ 2020 ■ 2021 ■ 2022

3. Implications

3.1 Financial - with the added statutory responsibility for undertaking complaint reviews there is an additional cost for the independent review officer. This is seen as value for money as they are only paid for the work that they carry out, there are no ancillary costs as there would be if they were an employed member of staff.

3.2 Legal – none identified.

3.3 Risk - None identified, beyond that to the OPCC's reputation if it does not deal with the issues raised appropriately and proportionately according to the merits of the individual case.

3.4 HR / Equality - none specifically identified.

Ethics and Integrity Panel

Title: OPCC Quality of Service & Policing Issues



Date: 1 February 2023

Agenda Item No: 12b

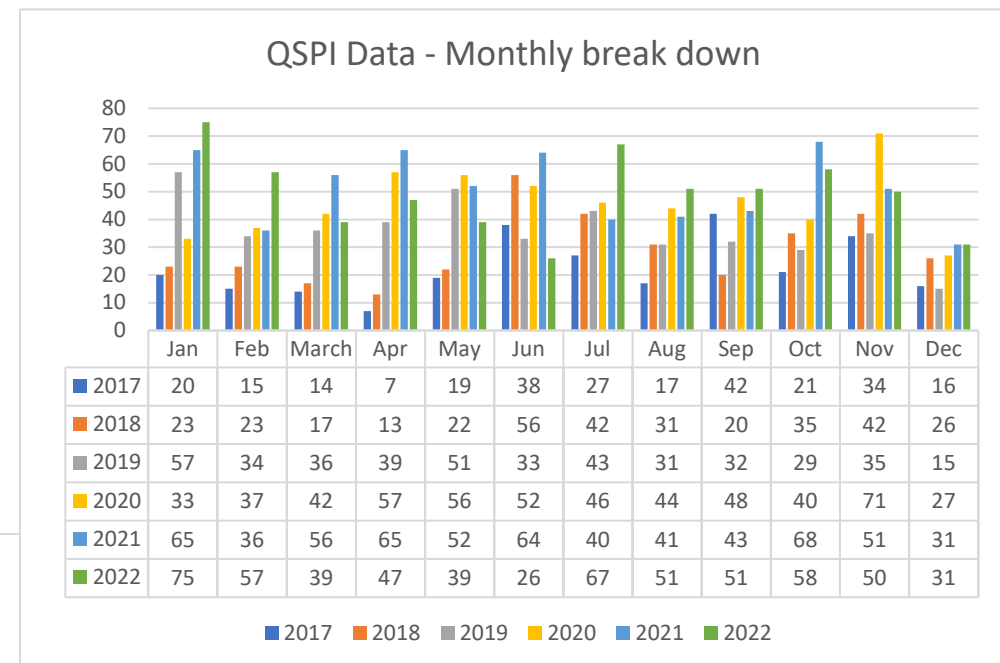
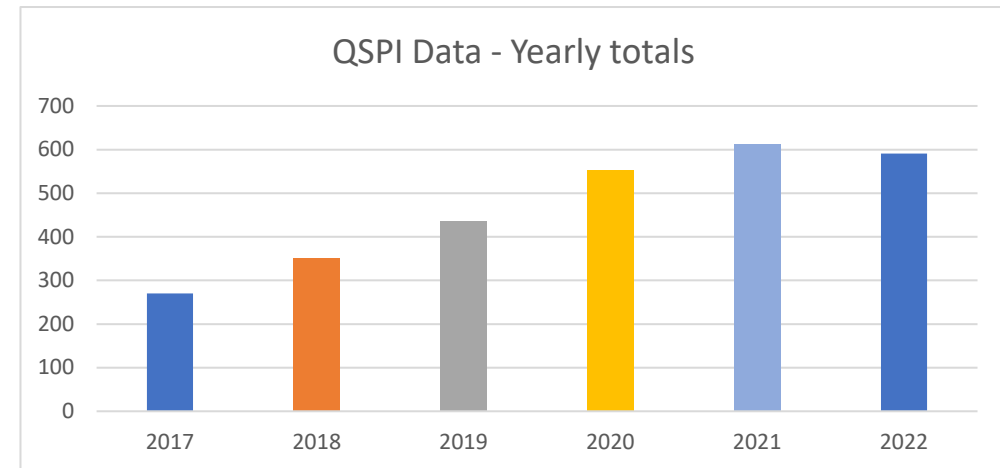
Originating Officer: Lisa Hodgson, Governance Officer

1. Introduction & Background

1.1 This report is a summary of QSPI's received in 2022, of which there were **591**.

1.2 The Office of the Police & Crime Commissioner (OPCC) receives a number of telephone calls, letters and emails from members of the public who wish to raise issues or dissatisfaction about some element of the policing service they have experienced, or concerns they have within the community. These are regarded as Quality of Service and Policing Issues (QSPI).

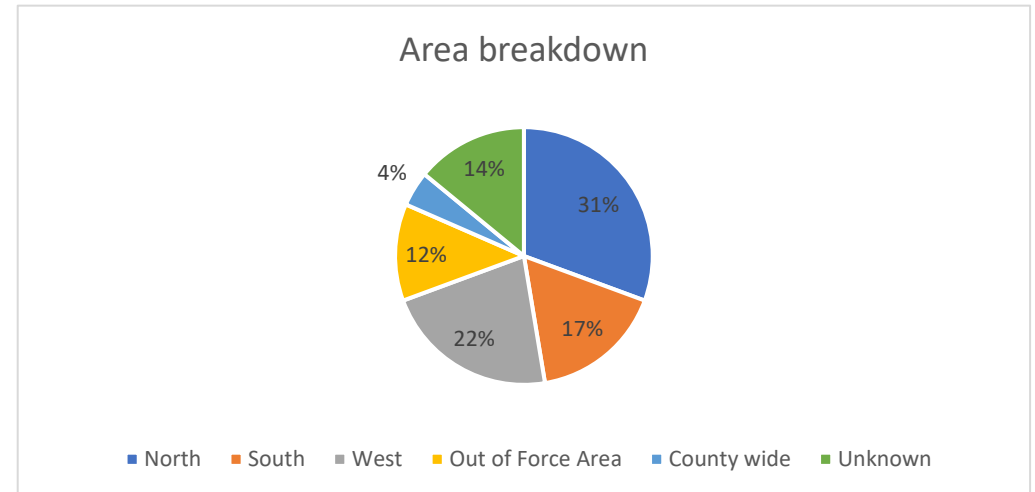
1.3 Since its inception the number of QSPIs received and dealt with by the OPCC has increased year on year. Included is a breakdown of QSPI's received per month.



1.4 Shown here is an area breakdown of where the complainant is based in Cumbria. When contacting the OPCC an individual may not always provide their location which is recorded as 'unknown'.

QSPI's are broken down into:

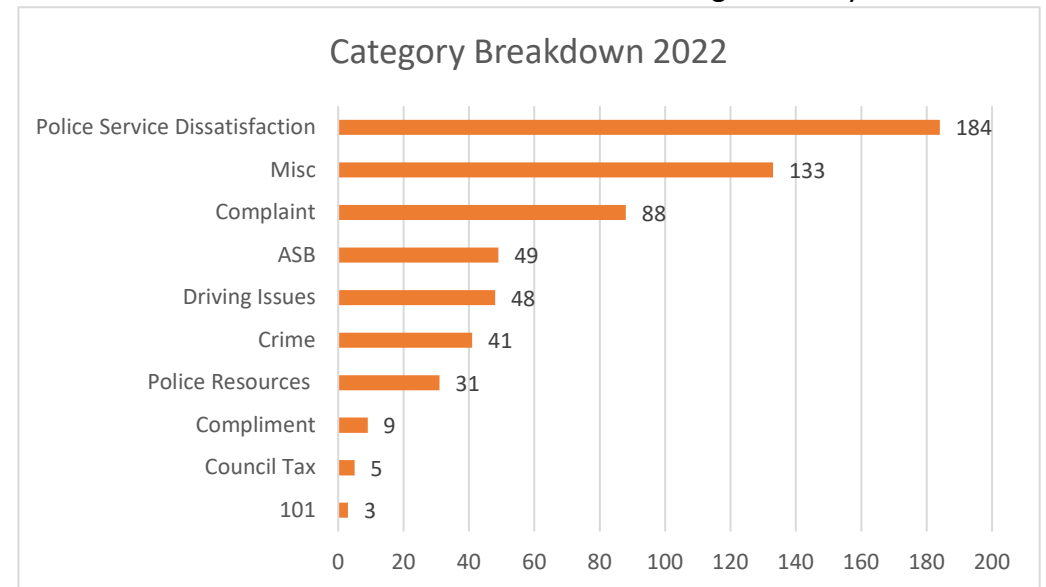
- North
- South
- West
- County Wide
- Out of Force Area (OFA)
- Unknown



1.5 Members of the public will contact the OPCC regarding a broad range of issues. The Commissioner will write to every individual using information provided by the Constabulary, within the OPCC or other partner organisations. Shown here is a breakdown of the issues raised throughout the year. As can be seen from this chart, the top 4 issues raised were:

1. Police Service Dissatisfaction – 184 QSPI's were received
2. Miscellaneous – 133 QSPI's were received
3. Anti-Social Behaviour – 49 QSPI's were received
4. Driving Issues – 48 QSPI's were received

Complaints - *When members of the public write to the OPCC to make a formal complaint about the police service received/ conduct of police officers/staff, these are recorded by the OPCC in the same way. The OPCC write back to all complainants advising that their complaint must be dealt with by the Professional Standards Department, and if we receive consent, we will forward this to PSD on their behalf. Further information specifically in relation to complaints is detailed in the complaints report.*



2 Compliments

The OPCC has received 9 forms of correspondence thanking the Commissioner and/or the Police for the service provided. It is important to recognise the compliments received and these are always shared where possible with the individual officers, and the Chief Constable's Office.

3 Making a difference

Detailed below is a summary of some of the work carried out by the Office of the Police and Crime Commissioner during 2022.

Correspondence from members of the public highlight to the Commissioner issues that are concerning local communities. In addition to individuals receiving a response, the information gathered is used to look at how assistance or changes can be provided throughout Cumbria.

The Commissioner has recently appointed a Victims' Quality Champion, whose role will include understanding the needs of victims following a crime or antisocial behaviour. The Commissioner took on the role of leading an annual review of compliance with the Victims' Code of Practice, which includes looking at how the Police and other criminal justice agencies provide the entitlements within the Code to victims and witnesses. This involves a dip sample of anonymised cases as part of the "Quality Assessment Framework", as it is known. The most recent review found good levels of compliance with the Code overall. The Office of the Police and Crime Commissioner is working with the Constabulary and the Cumbria Victims' Charitable Trust and have established an Independent Violence Against Women and Girls Scrutiny Panel to review how the Constabulary is dealing with such cases from a victim's perspective. The first meeting was held in early October and focused on cases of stalking the second meeting in early February will be focusing on Spiking.

The PCC continues to commission a range of services for those affected by crime. This includes emotional and practical support and advocacy through Victim Support as well as specialist services for victims of domestic and sexual violence through a range of providers. It also works with the county's women's centres to support them to continue to develop a range of services, including those who have been victims of domestic and sexual abuse.

Anti-Social Behaviour

Some initiatives which will help to address antisocial behaviour have been put in place. One of these is a new child mentoring service, RISE, which is provided by Barnados. It is supporting the Child Centered Policing Teams to provide early intervention with young people who are on the cusp of offending.

Another service which has been recommissioned for 2022-23 onwards is the restorative justice and mediation service, which is being provided by Remedi. This service will offer mediation between neighbours or other members of the public who are in conflict with one another and where that conflict is resulting in antisocial behaviour, to help them communicate and find a way forward.

Driving Issues

The OPCC's Communications Officer and a dedicated Project Manager attends monthly CRASH meetings to receive updates on how the Constabulary and partners are tackling road offences and promoting road safety and to identify areas where the OPCC can assist. Anti-social driving is a national priority for PCCs and is a key focus for Cumbria OPCC. The OPCC have an annual communications strategy to promote the rules of the road and raise awareness on how members of the public can stay safe on the road. In 2022, the OPCC have promoted and supported campaigns focusing on:

- Speeding
- Global Road Safety Week
- Child Road Safety Week
- Vulnerable Road Users Week
- Drug Driving Week
- Seatbelt Week

We work with partners, specifically Cumbria Police, to promote these campaigns and to produce media opportunities. Cumbria Police and Cumbria Fire and Rescue Service work together to deter dangerous driving, sending those who have been caught to Road Awareness Training instead of prosecution, where appropriate.

Brake – National Road Victim Service

The OPCC provided a contribution towards the Brake service, with Brake supporting 22 families in Cumbria bereaved or catastrophically injured due to road collisions in 2022. After a fatal or serious injury road traffic collision, the Constabulary's Family Liaison Officers (FLOs) provide information packs supplied by Brake. The FLOs then assist families to refer into the Brake programme, so they can receive a specialist, gold-standard, trauma-informed case management service that deploys professional caseworkers from day one of the crash supported by a triage and clinical team. The caseworkers assess needs, develop support plans, provide care directly and open doors to other care or support needed. The caseworkers will support the victims for as long as is necessary. Outcomes for victims include wellbeing, mental health, getting back into work and education and coping with the shock and trauma of a sudden bereavement.

Safer Streets

The Partnerships & Commissioning Team continues to secure funding from the Home Office Safer Streets Fund and lead on the delivery of projects to help neighbourhoods feel safer, reduce crime and anti-social behaviour, help the local communities feel heard and build confidence in the Constabulary and partner agencies. Safer Streets Fund Round 4 is underway, with the projects in Barrow and Carlisle designed to tackle the rising rates of anti-social behaviour being reported in the town centres, mainly attributed to young people. The projects will deliver improvements in town centre street lighting to make the public feel safer and prevent unwanted activity being carried out in the darkness. In addition to previous updates, the project will deliver

multi-agency events called Be Safe Stay Safe at 3 colleges targeting 16-18 year olds to raise awareness and educate young people about County Lines, exploitation and how to keep safe generally and online. The events also highlight the variety of support agencies available and how to access support if needed.

Safety of Women at Night (SWaN)

This project established a mobile multi-agency welfare hub staffed by volunteers to offer a safe space for anyone needing help or support whilst out in Carlisle on a Saturday night. The current volunteers are university students, but this will be opened up to any volunteers in the future who will be managed by the Neighbourhood Policing Team. Additionally, Carlisle City Council have employed staff who have additional training who act as additional eyes and ears on the street to help people or report issues, assisting as each situation dictates. Due to the initial success and demand, this scheme has now been fully adopted by the Constabulary.

Property Fund

The Property Fund redistributes funds by offering small grants to community groups to support activities which offer positive opportunities to young people and the community area to prevent crime and to make the community safer. The Commissioner has recently awarded funding to projects which will help to reduce specific local issues by involving young people already committing antisocial behaviour or at risk of this. For example, Westfield Housing Association were provided with some funding towards a football area on an estate in West Cumbria, this enables young people to move away from the housing estate where they were congregating and to meet in an area specifically set up for them. Funding was provided for “Youth Kits” to enable an organisation to run various mobile youth groups in Eden to offer young people a space to be and things to do whilst they are there. Funding was also supplied to our local sports groups to provide extra kit and facilities to encourage more young people to get involved in sport and exercise. Although there was only one round of the Property Fund in 2022, the PCC Property Fund provided £25,047.27 worth of funding to local groups and clubs.

Consultations

The Office of the Police and Crime Commissioner consulted members of the public, to listen to and obtain the views of local people on

- Perception of violence for young people to support the development of a Serious Violence Needs Assessment
- Local policing priorities around the County to inform the Police and Crime Plan
- Council tax policing precept
- As the shadow Cumbria Commissioner Fire & Rescue Authority, a consultation was carried out regarding council tax fire precept, formally done via Cumbria County Council

Pathways

“Pathways” is an early intervention offender management programme, providing specialist support to those eligible for Adult Out of Court Disposal options of deferred caution & deferred charge & delivered by Remedi. Appropriate use of out of court disposal means that victims receive justice quicker, while the

offender faces immediate consequences for their actions. The aim of the programme is to reduce re-offending and keep people safe. The aim of the programme is to reduce re-offending and keep people safe. To date there have been 705 referrals to the programme.

'They Matter'

This is an early intervention programme using restorative principles to address behaviours within a relationship that are either abusive or have the potential to become abusive for referrals assessed as low to medium risk. For those assessed as high harm / high risk They Matter delivers specific, bespoke intervention to prolific and repeat perpetrators across the county. They Matter will work alongside the existing work of Turning the Spotlight providing a suite of interventions to address the needs of perpetrators posing all levels of risk across Cumbria. The initial programme has shown a shift in attitude / awareness for participants & no reported violence from the group who have completed the whole programme.

Keep Safe

The Office of the Police and Crime Commissioner continues to develop and manage "Keep Safe" which is the crime prevention advice service available free of charge to all victims of crime and anti-social behaviour across Cumbria. For the period 1st April – 31st January 2023 the Crime Prevention Officers have provided the Keep Safe service to 486 individuals with 82.6% of these being recorded as female and 12.3% male and 5.1% not stated. The reason for the referral was recorded as Domestic Abuse in 54.1% of cases, with 33.6% of cases being marked as having been to MARAC. Dip samples are conducted monthly to ensure the victim is satisfied with the service they have received.

Drugs

Focusing on crime & the causes of crime the Commissioner seeks to develop projects & support policing activities which aim to prevent people from becoming involved in illicit drug taking and which target organised drug crime, including County Lines, to prevent the harm this has in local communities. Partnership working must be at the heart of any approach to county lines where we take responsibility for our part but also influence partners to take theirs. The 1CLIC (County Lines Informed Cumbria) model incorporates an innovative partnership approach between Cumbria Constabulary & The Well Communities. The link between the illicit drugs market and the harm caused to communities is well documented and evident in everyday policing. Drug misuse, addiction, consequential crime, threat and violence result in significant cost and demand on local health, social and criminal justice services plus personal cost to families and those individuals caught up in drugs misuse.

Together with robust enforcement activity, a dedicated drugs harm reduction approach was necessary that combines and maximises Police and Partnership knowledge, experience, and expertise to reduce harm, cost and demand as well as disrupting local illicit drugs market supply models. Providing funds to The Well Communities to work closely in partnership with the Constabulary will address & target key local issues sited in public consultation as drug dealing & taking. The approach of 1CLIC deals with addiction, disrupts and diverts, signposts into recovery and takes enforcement action where appropriate.

4. Implications

- 4.1 Financial - there are no additional financial costs associated with dealing with these complaints, quality of service issues as these tasks form part of staff roles.
- 4.2 Legal – none identified.
- 4.3 Risk - None identified, beyond that to the OPCC’s reputation if it does not deal with the issues raised appropriately and proportionately according to the merits of the individual case.
- 4.4 HR / Equality - none specifically identified.

Ethics and Integrity Panel



Title: Ethics and Integrity Panel Annual Report

Date: 10 January 2023

Agenda Item No: 13

Originating Officer: Joanne Head

CC:

Executive Summary:

The purpose of the Ethics and Integrity Panel is to promote and influence high standards of professional ethics, to challenge; encourage and support the Commissioner and the Chief Constable in their work by monitoring and dealing with issues of ethics and integrity in their organisations.

Recommendation:

That the Panel;

1. Consider the draft 2022 Annual Report; and
2. Provide feedback to inform the final version to be presented to the Police and Crime Commissioner at his Public Accountability Conference; and the Joint Audit Committee in May 2023.

1. Introduction & Background

- 1.1 The Panel's role is to identify issues and monitor change where required. It has no decision-making powers, although it is able to make recommendations to the Commissioner and the Chief Constable. It considers questions of ethics and integrity within both organisations and provides strategic advice, challenge and support in relation to such issues.

2. Issues for Consideration

- 2.1 A draft Annual Report has been prepared highlighting the work of the Ethics and Integrity Panel during 2022. The report illustrates the areas of business reviewed by the Panel; their findings and where the Panel have made proposals or suggestions to improve business practices and procedures.

3. Supplementary information

Appendix 1 – 2022 Ethics and Integrity Panel Annual Report



Ethics & Integrity Panel

2022 ANNUAL REPORT

Cumbria Office of the Police and Crime Commissioner
1-2 Carleton Hall, Penrith, Cumbria CA10 2AU | commissioner@cumbria-pcc.gov.uk
01768 217734

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Foreword from the Panel Chair

Welcome to the 2022 Ethics and Integrity Panel Annual Report. Over the last 12 months we have continued to see challenge and change for the Constabulary, it's officers and staff and the people of Cumbria that they serve. This can be attributed to us all emerging from the pandemic and also deal with the challenges of the cost of living crisis; in addition to issues both in the UK and abroad that affect us all. The Constabulary have through strong leadership, resilience and pro-active individual and team working have positively supported our communities and each other to deliver policing within our county with integrity and professionalism. The Panel have been hugely impressed by the resilience, commitment, focus and determination to serve our county; constantly striving to offer the policing service that the public require. This is a great credit to not only the Constabulary as an organisation but to each and every officer and member of staff.

I have had the pleasure of being Chair of the Ethics and Integrity Panel since 2016. The Panel's purpose is to promote and influence high standards of ethical performance in all aspects of policing in Cumbria and the work carried out by the Police and Crime Commissioner's office (OPCC). It achieves this by investigating, dip sampling, constructively challenging and reviewing a broad range of aspects of policy, process and performance, through the lens of ethics and integrity. We are entirely independent of both the Office of the Police and Crime Commissioner and the Constabulary.

We have an annual work programme that includes both routine and thematic activities through which we seek to always promote the improvement and value adding aspects of ethical responsibility. We do not hesitate to raise and challenge issues and actions where we believe there could have been an improvement, and importantly we also recognise and highlight areas of good practice, whilst helping to promote a wider understanding and awareness of the Constabulary's performance and ethical approach.

The work of the Panel is published on the OPCC's website and whilst the Panel membership is from a diverse range of backgrounds and experience, we have two things in common. We and our families live in the county and are committed to seeing the area thrive and we all share the strong desire to ensure that Cumbria Constabulary continues to deliver high quality services to the public, while maintaining Cumbria as the safe and secure place to live that it currently is. The Chief Constable, the Commissioner and their teams, fully support us in our work and are open to challenge, feedback and suggestions for improvement. This in itself is an indicator of a strong, open, transparent and ethical culture.

While 2022 has been an incredibly challenging year, we have enhanced our work programme, and have adapted to look at a number of thematic areas, including specific issues and activities. The information in this, and our other quarterly reports, helps to promote a wider understanding and awareness of the Constabulary's performance and ethical approach. We hope that you find the report useful and informative.

Alan Rankin

Ethics and Integrity Panel Chair

The Police and Crime Commissioner, Peter McCall



I am incredibly grateful for the commitment, professionalism and pragmatic approach taken by the Ethics and Integrity panel in their work. They provide effective and sensible challenge which I have no doubt enables both my office and the Constabulary to take stock and indeed to change practice where necessary in order to improve the service we are all here to deliver to the public of Cumbria.

As Police and Crime Commissioner, it is my role to serve the communities of Cumbria and be their voice for policing matters. Many individuals contact me and it is important that myself, my staff and indeed the Constabulary work to high

ethical standards to ensure that public confidence is maintained.

Integrity and ethical values must be one of our highest priorities.

Whilst we are blessed with highly professional, dedicated and committed officers and staff, we must always be ready to examine performance to ensure that every member of the organisation maintains the highest possible standards, when often faced with difficult and challenging circumstances.

I am grateful for the independent work of the Ethics and Integrity Panel as it is extremely important providing a valuable scrutiny role on the ethical values of both organisations. The ability of the panel to undertake in-depth scrutiny of specific areas provides not only myself but also the communities of Cumbria with additional assurance.

The variety of issues that they scrutinise continues to evolve to ensure that the Panel remains effective. It seeks to achieve this by acting as a critical friend to the Constabulary and the OPCC in the work it oversees. I look forward to working with the Panel in 2023 as my role expands to include the Cumbria Fire & Rescue Service.

Peter McCall

Police and Crime Commissioner for Cumbria

The Chief Constable, Michelle Skeer



As a Constabulary we consistently strive to provide members of the public with an outstanding police service to keep Cumbria safe.

The Police Code of Ethics affords underpinning of our standards and principles. Through the Ethics and Integrity Panel there is consistent

independent review and scrutiny of our commitment to ethical policing in Cumbria. I am continually reassured of our transparency and promotion of openness, leading to an increase in public confidence.

Cumbria is one of the safest areas in the country to live, work and visit, as such members of the public have an expectation of the level of policing they should receive. With the rigorous review and advice of the Panel I am encouraged that my officers and staff are determined to continue to deliver an outstanding police service to keep the communities of Cumbria safe.

Michelle Skeer

Chief Constable, Cumbria Constabulary

About the Ethics and Integrity Panel

Within Cumbria Constabulary and the Office of the Police and Crime Commissioner, the Ethics and Integrity Panel challenge, encourage, support and promote and influence high standards of professional work and ethics. Ensuring that these are effective in both organisations. This report provides an overview of the work that the Panel has carried out during 2022.

The Panel meets privately on a quarterly basis to enable open and frank discussions. The agenda and reports are published on the Commissioner's website following each meeting, with only sensitive or confidential information being excluded. Reports are provided by the Panel to the Commissioner's public meeting to provide information about the Constabulary and OPCC's performance in areas that relate to ethics and integrity. The purpose of this is to promote openness, transparency and public confidence.

A work programme is developed and agreed on an annual basis enabling the Panel to fulfill its terms of reference and scrutiny role. Where necessary the Panel will also provide scrutiny for areas identified during HMICFRS inspections to enable the implementation of recommendations to be monitored. In addition, they have critical and important thematic issues referred to them by both Cumbria Constabulary and the Office of the Police and Crime Commissioner. This enabled the Police and Crime Commissioner and the Chief Constable to be provided with independent reassurance.

Further information regarding the Panel, its membership, and the work it carries out can be found on the Commissioner's website:

<https://cumbria-pcc.gov.uk/what-we-do/ethics-integrity-panel/>

The membership of the Panel in 2022 was:

Mr Mike Duff
Mr Alan Rankin
Mr Alex Rocke
Ms Jane Scattergood

Work of the Panel During 2022

Code of Ethics and Code of Conduct

The Panel's role is to ensure that both the Constabulary and the Police and Crime Commissioner have embedded within their organisations the **Code of Ethics** and **Code of Conduct** respectively.

The Panel have been provided with assurance whilst carrying out their role that both organisations take the ethos of the Code of Ethics and Code of Conduct seriously and this has been evident in the reviews and dip samples they have undertaken in other areas of business. During their various dip sample sessions, the Panel saw first-hand that policies and procedures within the Constabulary had the ethos of the Code of Ethics embedded within them.



Similarly, the Commissioner upon re-election in May 2021 swore an oath to act with integrity and signed a Code of Conduct and Ethics. It sets out how the Commissioner has agreed to abide by the seven standards of conduct recognised as the Nolan Principles. This Ethical Framework allows transparency in all areas of the work of the Police and Crime Commissioner. These principles encompass the Commissioner's work locally and whilst representing Cumbria in regional and national forums.

Equally importantly, all the OPCC members of staff adhere to a **Staff Code of Conduct** which is based upon the model Code of Conduct for Local Government Employees and incorporates the principles arising from the Nolan Report, providing a framework for all employees in terms of official conduct

During 2022 the Panel did not identify any complaints received from either members of staff or the Commissioner regarding conduct or integrity.

Public Complaints



At their quarterly meetings the Panel received performance data from the Constabulary on the number of complaints received and how these have been managed, including whether they were within the required timescales. From these reports there were areas which had seen an increase in complaints being received, these being impolite language, race and complaints regarding young in-service officers. The Panel undertook to specifically review some of these complaints to see if there were any trends or concerns.

During 2022 the Panel carried out two dip sample sessions in which they reviewed a total of 67 files. They carried out the dip samples directly via the Centurion system within the Professional Standards Department, enabling members to view all information, actions and outcomes on the live system. Panel members spoke directly with case workers regarding any issues or concerns.

Following the sessions any recommendations or comments were collated within an action sheet to ensure that they are completed and where appropriate implemented in a timely manner. Some of these include:

- Officers not using body worn video when dealing with incidents or members of the public continued to be an issue, although the situation has improved significantly over recent years. A number of complaints could have been dealt with quicker and more effectively if this independent evidence had been available.
- The use of the Practice Requires Improvement (PRI) process had increased during the year allowing officers and their supervisors to reflect on matters and how their service could improve in the future. This was evident in a number of cases which confirmed that the process was now embedded within the force and being used to good effect.
- A number of complaints related to officer driving incidents which had resulted in officers undertaking driving training courses as part of the PRI process.

Quality of Service



The Office of the Police & Crime Commissioner received 591 letters, emails and telephone calls from members of the public who wished to raise issues or dissatisfaction with the Commissioner, highlighting issues that were concerning local communities. The majority of these related to operational policing and the OPCC liaised with the Chief Constable's Staff office to provide information or a solution for the individual. The types of issues raised are varied and detailed below are some of the categories:

- The Police Service Dissatisfaction in relation to the standard of service provided or received.
- Driving Issues – anti-social driving and speeding.
- Crime – drug dealing, rural crime and ongoing 'in progress' ASB neighbour issues.
- Anti-Social Behaviour
- Miscellaneous – how crime figures are recorded, DBS check process and CCTV cameras.

Many of the solutions were provided by the Constabulary in conjunction with local policing teams, local focus hubs and partner agencies, including local educational establishments, to see to identify the underlying causes of crime or behaviours and seek to support and deter individuals from going on to make further adverse live choices. The information gathered is used to look at how assistance or changes can be provided not only locally but throughout Cumbria. The Commissioner also uses the information to implement local initiatives to make a difference to local communities. Some of these included Safety of Women at Night (SWAN), Safer Streets Projects in Whitehaven and Workington, and funding for local projects through the 'Property Fund'

The OPCC also received a number of compliments thanking the Commissioner or the Constabulary for the service they provide.

Complaint Reviews



From 1 February 2020 the Office of the Police and Crime Commissioner (OPCC) has undertaken reviews of the outcomes of public complaints when requested by the complainant. During 2022 the OPCC carried out 57 reviews of which 6 (10%) had been upheld. The Panel dip sampled a number of reviews and felt that they had been dealt with appropriately and within a timely manner. Where a review had been upheld and recommendations made, the Constabulary had carried out further work providing the complainant and OPCC with their findings and outcome. Identified learning from the upheld reviews was collated and disseminated within local teams and more widely across the force.

Police Officer & Police Staff Misconduct



The Panel received information on a quarterly basis relating to **Police Officer and Police Staff Misconduct** from the Constabulary's Professional Standards Department. This enables the Panel to monitor performance in relation to these areas of business and consider any patterns or trends across the whole organisation.

As part of their work programme the Panel have reviewed misconduct files twice during 2022. During the session the Panel reviewed all completed files, providing views and recommendations for any improvement in the way information was provided, how cases were handled or the public perception of the handling of such cases. Nearly half of the cases related to officers' conduct when they were 'off-duty'. The Panel were pleased to note that the quality of the files was being maintained and that actions were being fully recorded within each case.

Grievances



On a six-monthly basis the Panel have reviewed **Grievances** being processed by the Constabulary. Although the Constabulary's HR Department dealt with all grievances, they link in with the Anti-Corruption Unit to ensure matters were cross referenced. In April and October 2022, the Panel reviewed a total of 3 finalised cases and discussed each one in turn with the HR Manager. Generally, the grievances were regarding policies and procedures or action taken against an individual.

Civil Claims



On behalf of the Police and Crime Commissioner the Panel also monitor **Civil Claims** being processed by the Constabulary's Legal Department. They received information about the types of claims being made, the stage the proceedings had reached and about the claims that had been resolved. As part of this oversight the Panel seek assurance that any trends are being identified and how the organisation has learnt from particular cases; disseminating such information throughout the organisation to avoid future risks and claims.

Following issues raised by the Panel in November 2020 regarding property, the Constabulary had carried out a review of this area of business and actions taken to ensure that the findings were incorporated into any changes made during 2021 and 2022. In November 2022 the Panel were updated on the work carried out and would continue to monitor this area of business as part of their 2023 work programme.

Officer Recruitment



The Panel monitored the Constabulary's progress on **Officer Recruitment** following the Government's announcement to appoint 20,000 officers across England and Wales. By November 2022 Cumbria Constabulary had an overall establishment of 1,308 officers and were programmed to achieve a total establishment of 1,368 officers by the end of March 2023. New officer intakes were programmed for December 2022 and March 2023, combined with officers transferring from other forces. Nationally there had been concerns regarding vetting decisions due to the pressures of recruiting new officers. As part of the Panel's 2023 work programme they would carry out a dip sample of vetting decisions. A number of officers were due to retire in 2022 and 2023 and this was being factored into the numbers being recruited. It was envisaged that the force would meet the Government's target by 31 March 2023.

As part of their oversight work the Panel were keen to understand the attrition rate of new police officers joining the service following 35 resignations from the Policing Education Qualifications Framework (PEQF) programme in which officers studied for their university degree whilst working. The Panel were assured that support for student officers had been developed to enable them to manage their caseloads and provide academic support throughout their probation period and beyond. The introduction of so many new police officers had resulted in approximately 75% of front-line response officers having less than 3 years' service with their tutor constables having less than 5 years' service. During the year the Constabulary had introduced a Tutor Constable Programme which had seen 49 tutors appointed force wide. This programme enabled the tutors to not only support the new officers but that they themselves were supported and fully understood the requirements of the role. This will continue to be an area of focus for the Panel.

Officer & Staff Wellbeing



During 2022 the Panel monitored **Officer and Staff Wellbeing and Sickness**. During the second half of the year force absence rates had risen to 4%. The number of stress related referrals had increased to 62 which had been attributed to shift patterns and was subsequently raised with the Constabulary's Health and Safety Committee. A new shift pattern had been introduced to alleviate the issues with managers required to carry out a stress risk assessment to enable tailored support to be provided to individuals. A review of occupational health services and support functions was being carried out by the Constabulary; which the Panel would monitor during 2023.

Information Management



During 2022 the Panel received six monthly reports on how the Constabulary and Office of the Police and Crime Commissioner were complying with their statutory duties in relation processing and managing data. This included Freedom of Information Requests, Subject Access Requests and data processing. Both organisations continued to see a year-on-year increase in the number of requests being received. The reports also identified whether any data breaches had occurred and how these were dealt with, including whether or not they had been reported to the Information Commissioner's Office and the subsequent outcomes. The Constabulary had undergone a review of the teams dealing with information across the Constabulary and placed additional resources within these teams.

Violence Against Women and Girls



In February and August, the Panel were provided with updates on the work being carried out by the Constabulary to deliver an array of services in response to offences such as domestic abuse, sexual crime and patterns of behaviour. A strategy was in place which encompassed the three pillars set out by HMICFRS, the NPCC and Cumbria Constabulary's aspirational outcomes. A Violence Against Women and Girls (VAWG) board and scrutiny panel had been set up ensuring that streams of work were being implemented and acted upon. Student and operational officers received training as part of their course or programmed training days.

Race Action Plan



Following the National Police Chief's Council (NPCC) identifying five key areas to change internal cultures and inclusivity towards communities the Constabulary had carried out an internal and external consultation process. HMICFRS as part of their cultural audit process had found the force to have an inclusive culture. The Panel were briefed on how the Constabulary would progress with this work during the forthcoming year and how this work would be benchmarked to enable performance and success to be measured.

The Learning and Development department were working towards a Conscious Inclusion Accreditation Programme for its officers and staff with the assistance of Anti-Racist Cumbria to understand the history and experience of black people with policing. Six monthly reports would be presented to the Panel to enable them to provide oversight of the work being carried out.

Thematic Sessions

Since its inception, the Panel has delivered a significant programme of work on a planned, dynamic and responsive basis. Detailed below and overleaf are some of the areas the Panel reviewed during 2022:



In February the Panel received an annual report on **SpitGuard Usage** within the Constabulary, which had decreased during the previous year. The Panel had sought assurance that where a SpitGuard was used on a young people that it was removed as soon as possible. They asked that an article in the Constabulary's Pass Newsletter advise that body Worn Video should be activated when applying SpitGuards to protect not only the individual but the officers involved. From 2023 this would be included within the annual Stop and Search and Use of Force Report.



During 2022 the Panel undertook quarterly reviews of **Stop and Search** and **Use of Force** incidents following HMICFRS inspections, enabling the implementation of recommendations to be monitored. The Panel carry out reviews of incidents via body worn video and completed forms. The Panel reviewed 11 separate incidents and found that although the incidents themselves were being carried out well the completion of the required forms was not. This had also been recognised by the Constabulary who would be introducing annual refresher training as part of the 3-day personal safety training package and include communication and de-escalation training. The Constabulary were keen to use Stop and Search as a key tool by the proactive policing teams to help prevent and detect crimes.



As part of the Stop and Search incidents reviewed there had been an inclusion of incidents where the use of **TASER** had also been a factor. As part of their work the Panel found that there was no record of such incidents being reviewed by supervision and they believed that this should be done every time to ensure any issues or learning was identified. A process was subsequently implemented by the Constabulary with all 2022 cases being reviewed.



The use of **Body Worn Video** continued to feature within the monitoring work of the Panel. Noticeably when reviewing Stop and Search or Use of Force incidents the first 30 seconds of footage had no sound when activated by the officer. The Panel felt that this timeframe was often when an officer was introducing themselves and provided a good context of the interaction. They asked that this be looked at by the Constabulary and would be included within the Panel's 2023 work programme.

Future Work

Cumbria Fire and Rescue Service

As part of the Local Government Reform programme the governance of Cumbria Fire and Rescue Service (CFRS) will be transferring to the Police and Crime Commissioner from April 2023 following a decision by the Home Secretary. As part of this governance it has been agreed that the Ethics and Integrity Panel will expand their remit to also provide oversight to the Fire Service.

Cumbria Fire and Rescue Service Plan 2022-2023

People: We will have a motivated and committed workforce that is innovative, supported, skilled and customer focused.



Protection: We will protect people, property and the environment by working with partners to ensure compliance with



Prevention: We will prevent fires and other emergencies by prioritising the most vulnerable.



Response: We will plan for and respond effectively to emergencies when they arise.



POLICING AND CRIME OBJECTIVES



Panel Member Recruitment

Following a recruitment programme in the autumn of 2021 a new member, Ms Jane Scattergood, was appointed to the Panel in January 2022. Upon appointment she was provided with induction training from the OPCC Governance Manager and mentoring from other Panel members.

Some of the current Panel members are due to end their membership in 2023 and 2024. A further recruitment campaign will be carried out during early 2023 when the Office of the Police and Crime Commissioner, Cumbria Constabulary and Cumbria Fire and Rescue Service will seek to extend the membership and look to members of the public both within and out with Cumbria to attract different skill sets.

Conclusion

The Panel continues to develop their role, expanding into other areas of business to assist not only the Constabulary but enable the Police and Crime Commissioner to have further and more detailed oversight.

The Panel have shown their ability to respond to emerging and changing situations; adapt to understand the issues; work with the Constabulary and OPCC to carry out work in addition to that scheduled within their work programme; and provide reassurance to both organisations and the public.

Recommendations and guidance given by the Panel continues to be welcomed by both the Constabulary and OPCC; resulting in a number of positive changes and developments to processes and procedures. The Panel's 2023 work programme will continue to ensure that the Panel remain an independent body in their oversight of Cumbria Constabulary, Cumbria Fire and Rescue Service and the Office of the Police and Crime Commissioner.

