

Performance and Resources Scrutiny Programme 2021

Report to: the Office of the Police, Fire and Crime Commissioner for Essex

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1.0 Purpose of Report

This annual report gives an overview of progress following the changes in Police (Conduct) Regulations 2020 and the Professional Standards Department's (PSD) response to this. The report gives information regarding public complaints, Police conduct and developments within PSD. This report compliments the scrutiny of complaints and conduct at the Professional Standards Quarterly Meeting.

2.0 Recommendations

This report is for the board to note.

3.0 Executive Summary

The work of Professional Standards Department (PSD) is provided along with an explanation of the new Regulations introduced in February 2020 and the impact this had on PSD. The direct result of these changes for public complaints is an increase in the number of complaints recorded, as low-level dissatisfaction issues are now recorded as complaints. Precise analysis of this has been made difficult as COVID-19 has affected the timings of complaints being made and the IOPC have not yet provided comparable data following the introduction of the new Regulations. The paper

references different elements of the complaints system including, timeliness, ethnicity of complainants and outcomes.

Overall, the levels of conduct in the force have remained steady. IOPC referrals remain steady and liaison is good.

Work in the last year within PSD focuses on the four areas of Prevention, Confidence, Learning and Enforcement. Significant progress has been made in ensuring the workforce have a better understanding of themes through improved communication methods. PSD have sought to increase confidence internally by improving relationships, timeliness of conduct investigations and transparency. Public confidence is an area being developed into 2021/2. A clear programme of learning is in place where opportunities to improve are identified and implemented via the Integrity and Counter Corruption board and Learning the lessons board.

The paper reflects on issues and risks including the lack of current IOPC national data, and explains the work completed to ensure previous HMICFRS areas for improvement have been completed and finalised. PSD contributes towards the Police and Crime Plan centring mostly around public confidence. Considerations are identified around health and safety implications, ethnicity and human rights – These include concern of COVID-19 complaints from members of the public and how the increased use of strands assists in identifying concerns from different ethnic groups in relation to policing.

Finally, the report details the intended innovations over the coming year to ensure PSD focuses on shifting the balance from 'enforcement' to improved learning through formalised de-briefing and prevention with the use of PSD surgeries and improving public confidence by increased community engagement via IAG and scrutiny of PSD decision making.

4.0 Introduction/Background

The Professional Standards Department (PSD) coordinates investigations and responses to public complaints. It is also responsible for the coordination and conducting the investigation into allegations of misconduct against Police Officers and Police Staff. Part of this function includes the collection and assessment of intelligence submitted concerning officers/staff and identifying and addressing current threats to the integrity of the organisation. PSD is also the conduit between the IOPC and Essex Police and the main point of contact with the PFCC regarding public complaints.

In February 2020 new legislation in the form of Police (Conduct) Regulations 2020 and the Police (Complaints and Misconduct) Regulations 2020 was enacted.

The main implications of this legislation were a fundamental change to the way public complaints and expressions of dissatisfaction were recorded - resulting in the formalisation of recording lower level complaints. The definition of 'misconduct' was changed to raise the level at which this could be the outcome. This enables forces to place an emphasis on reflection and learning for low level conduct or mistakes rather than only being able to rely on punitive measures.

The impact for PSD resulted in a predicted increase in workload, especially surrounding the complaint recording and processing. Significant preparation in 2019 and early 2020 (including growth in 2020/21) resulted in a smooth transition to the new Regulations.

This report gives more detail on the implications the changes had to complaint recording, information around police conduct and further work PSD has completed (and planned) which contributes to the Force Plan and PFCC Plan.

Because the changes in recording were so significant, this report focuses attention on data from Q1 – Q3 2020/21.

5.0 Current Work and Performance

Section 5.0 is split into two sections. The first will use data to show the current position of Essex Police in respect of Complaints and conduct. The second section will show the current work of PSD as a command.

5.1 Public Complaints

Since the introduction of the new regulations, the IOPC have not been able to provide the usual comparable date with other forces. This is predicted to be released for the first time in April 2021 (more detail in 6.3 – Risks).

Table 1 displays the levels of public complaints. The orange line indicates individual complainants and is more representative of the increase. The blue line shows complaint strands. It is not uncommon for one complaint to contain several strands.

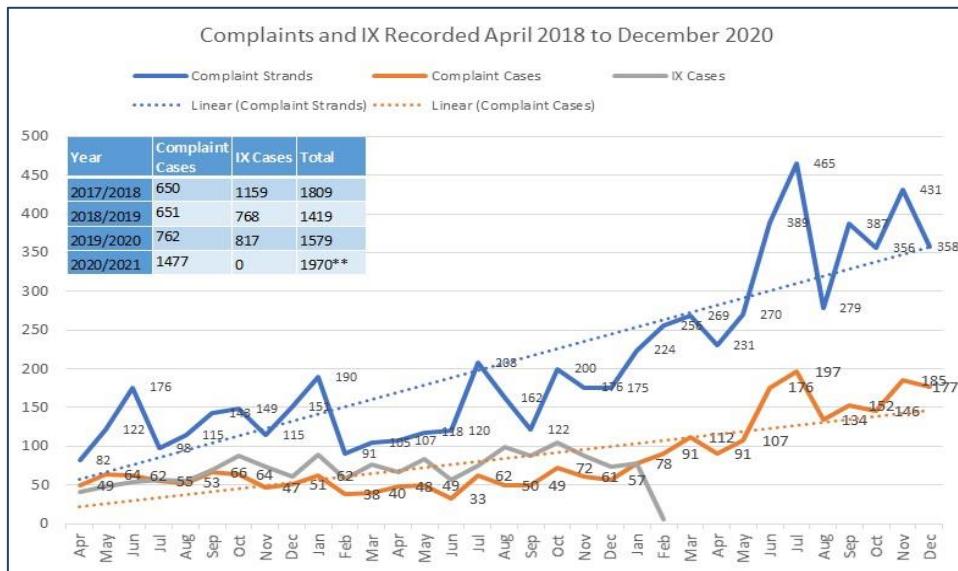


TABLE 1

The main increase was not experienced until the end of May and this coincided with the end of the first COVID-19 lockdown. COVID-19 has made it difficult to understand what the 'new normal' level of complaints will be as complaints have fallen during periods of lockdown. If complaints continue as predicted, 2020/21 will show a total of 1,970 public complaints. The embedded table with 1 draws a comparison to previous

years by including 'IX' numbers against public complaints 2017/18 onwards, IX being the previous method for the recording of low-level complaints.

Categories of Complaints

Since the introduction of the new regulations in February 2020 the complaint categories have changed, although many are comparable to the old categories. Within each category letter, there are many different stands. For example, 'B' refers to Police Powers, Policy & Procedures – but contains B1-B9 and includes; Stop/Search, Power to arrest, Use of force, Bail, Search of premises etc. This extension of categories allows better analysis of what is being complained about and provides increased opportunity to address trends of the type of complaint.

Overall Category	Description/Summary	Q1 Total April to June 2020	Q2 Total July to Sep 2020	Q3 Total Oct to Dec 2020	Q1, Q2 and Q3 Total	% of Total Q1, Q2 & Q3
A Delivery of Service	Police Action, Decisions, Information	362	508	570	1440	45.5%
B Police Powers, Policy and Procedures	Searches, Use of Force, Custody, Evidence	191	233	199	623	19.7%
C Handling of, or Damage to property/premises	Property/Premises Handling/Damage	36	37	41	114	3.6%
D Access and/or disclosure of information	Use of Data, disclosure	25	33	37	95	3.0%
E Use of Police Vehicles	Use of Police Vehicles	5	7	12	24	0.8%
F Discriminatory Behaviour	Various Discrimination Categories	22	43	42	107	3.4%
G Abuse of Position/Corruption	Organisational, Abuse of Position, Justice	13	13	21	47	1.5%
H Individual Behaviours	Impolite, Unprofessional, Lack of fairness, Overbearing/Harassing	229	234	212	675	21.3%
J Sexual Conduct	Sexual Assault, Harassment, Other Sexual Conduct	2	7	0	9	0.3%
K Discreditable Conduct	Discreditable Conduct	1	13	4	18	0.6%
L Other	Other	4	3	7	14	0.4%
		890	1131	1145	3166	100%

TABLE 2

Delivery of Service, Police Powers and Individual Behaviours continue to be the three most complained about areas. This is in line with previous years.

COVID-19 Related Complaints

Table 3 shows a total of 143 complaint cases in relation to COVID-19. The 'other' category indicates a complaint that is likely to have been made anyway, but has a COVID element to it, leaving 106 complaints solely about COVID.

These show 53% involved complaints about officers not wearing masks/not social distancing. The level of complaints around police inaction relating to COVID or police overreacting in relation to COVID are almost the same (11% and 10%). This indicates that the policing style has been proportionate, reflected in the SMSR independent survey results. The volume of COVID complaints has reduced meaning since the beginning of Q4 there have only been 5.

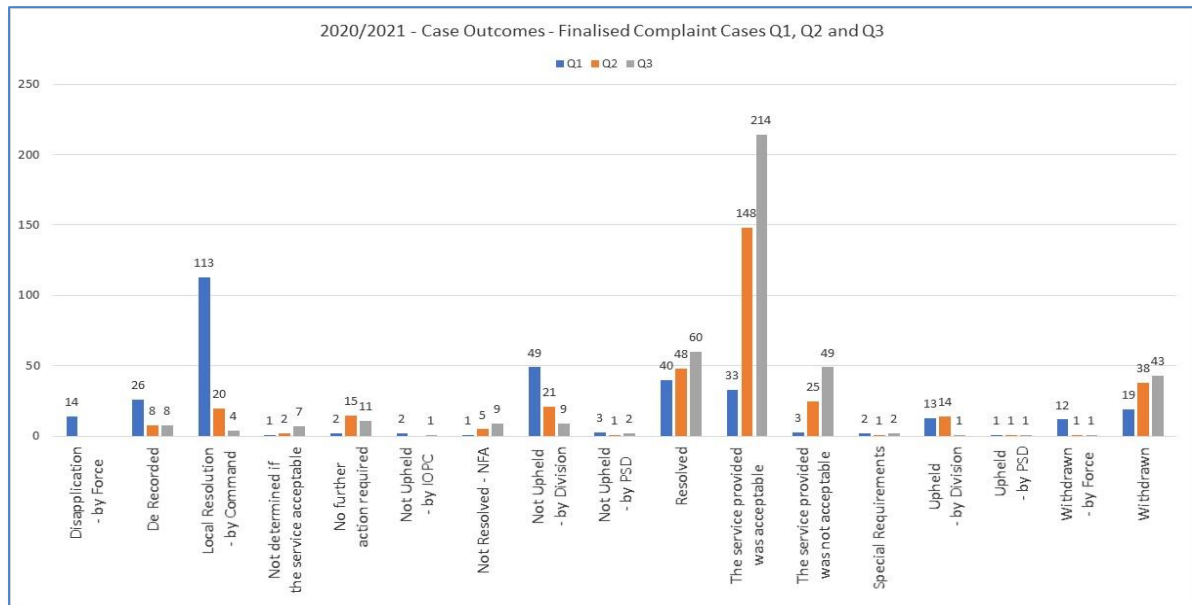
	OTHER	Inaction	Overreaction	Officer Related	TOTAL
Q1	23 (35%)	10 (15%)	11 (16%)	23 (34%)	67
Q2	6 (16%)	5 (13%)	1 (3%)	26 (68%)	38
Q3	8 (21%)	1 (3%)	3 (8%)	26 (68%)	38
TOTAL	37(26%)	16 (11%)	15 (10%)	75 (53%)	143

TABLE 3

Outcome of Complaints

Table 4 shows the outcome of complaints during the report period (Apr-Dec 2021). There are still some ‘old style’ outcomes (such as local resolution) due to old complaints still being finalised under the old Regulations during the reporting period. It shows that of the cases finalised, 11% have an outcome where the service provided was not acceptable.

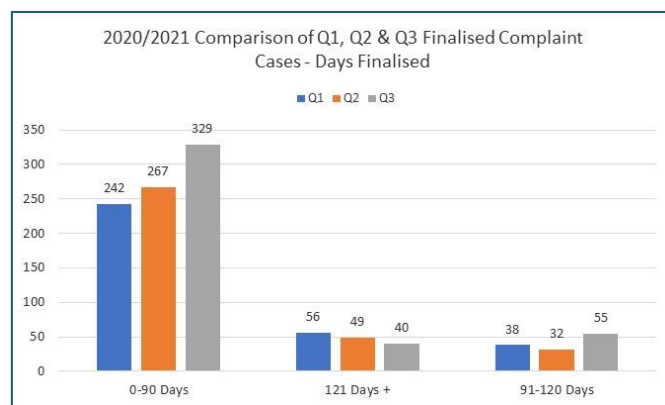
TABLE 4



Timeliness

The speed with which complaints are resolved is of paramount importance in providing the public with confidence in the complaints system. Timeliness is scrutinised internally at the quarterly Integrity & Counter Corruption Board and at the quarterly Professional Standards Scrutiny meeting with the Deputy PFCC. The new regulations also require the investigating body to report any complaint (or conduct) matter which exceeds 12 months to the PFCC and the Independent Office of Police Conduct (IOPC). The ambition is for complaints to be resolved within 120 days. Table A5 shows the proportion of complaints resolved in the different time frames.

TABLE 5



Ethnicity of Complainants

Improved recording methods and expansion of complaint categories have enabled PSD to report the ethnicity of complainants (when declared). Table 6 shows the percentages of complaints from different ethnic backgrounds.

TABLE 6

Self Defined Ethnicity	Q1	Q1 %	Q2	Q2 %	Q3	Q3 %	Total	% Total
Asian	5	1%	12	3%	21	4%	38	3%
Black	15	4%	29	6%	21	4%	65	5%
Mixed	11	3%	17	4%	17	3%	45	3%
Other Ethnicity	1	0%	2	0%	2	0%	5	0%
Unknown/Not Stated	65	18%	75	16%	115	23%	255	19%
White	261	73%	341	72%	329	65%	931	70%
Total	358	100%	476	100%	505	100%	1339	100%

Recent analysis has shown differences in the categories of complaints, for example Black complainants being much less likely to complain about the service they receive from the police, but more likely to complain about police powers. PSD provide this data to the Diversity, Equality & Inclusion board and the Integrity & Counter Corruption Board. Work is ongoing to significantly reduce the 19% 'Unknown / Not stated' category of self-defined ethnicity.

Police Officer and Staff Misconduct

Allegations of misconduct have remained steady for several years. The orange line in Table 7 indicates cases and the blue line indicates strands within a case. It is not uncommon for allegations against an officer to include more than one of the standards of professional behaviour (for example a breach of data protection would cover the strands of 'duties & responsibilities' and 'confidentiality').

TABLE 7

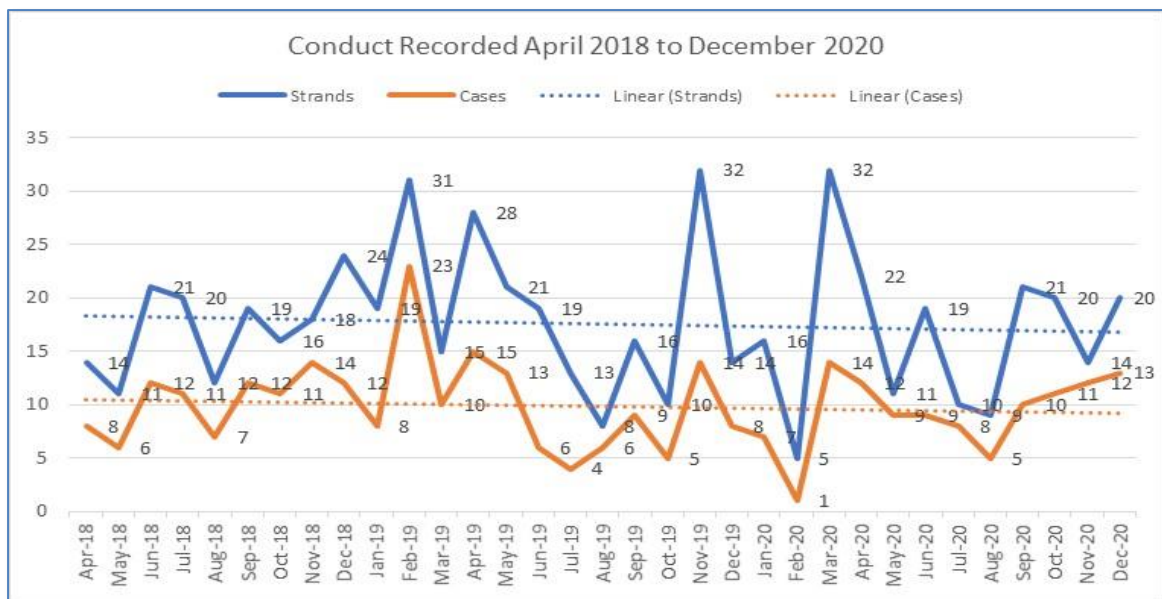


Table 8 shows the different standards of professional behaviour and the percentage of allegations against each one.

TABLE 8

Category	Total 2020-2021	% Total
01 Honesty and Integrity	16	11%
02 Authority, Respect and Courtesy	14	10%
03 Equality and Diversity	7	5%
04 Use of Force	1	1%
05 Orders and Instructions	11	8%
06 Duties and Responsibilities	31	21%
07 Confidentiality	20	14%
08 Fitness for Duty	5	3%
09 Discreditable Conduct	39	27%
10 Challenging and Reporting Improper Conduct	1	1%
Not known	1	1%
Total	146	100%

It should be noted that an allegation is recorded against an officer if the appropriate authority decides whether the allegation, if proved, would amount to misconduct or gross misconduct.

Outcomes

In 53% of cases, the outcome is 'no case to answer'. However, over half of those cases result in some kind of action (either reflective practice or management action).

Of the 'cases to answer', 70% are referred for formal proceedings (Misconduct Meeting or Misconduct hearing). The table below shows the final outcomes of all 'cases to answer'

TABLE 9

Final Outcome	2020	%
Dismissal	11	11%
Final Written Warning	14	15%
Management Action	25	26%
Management Advice	4	4%
No Action	8	8%
Not Proven	3	3%
Reflective Practice	1	1%
Resigned or Retired	1	1%
Resigned or Retired /Would have been dismissed	11	11%
UPP	2	2%
Written Warning	16	17%
Total	96	44%

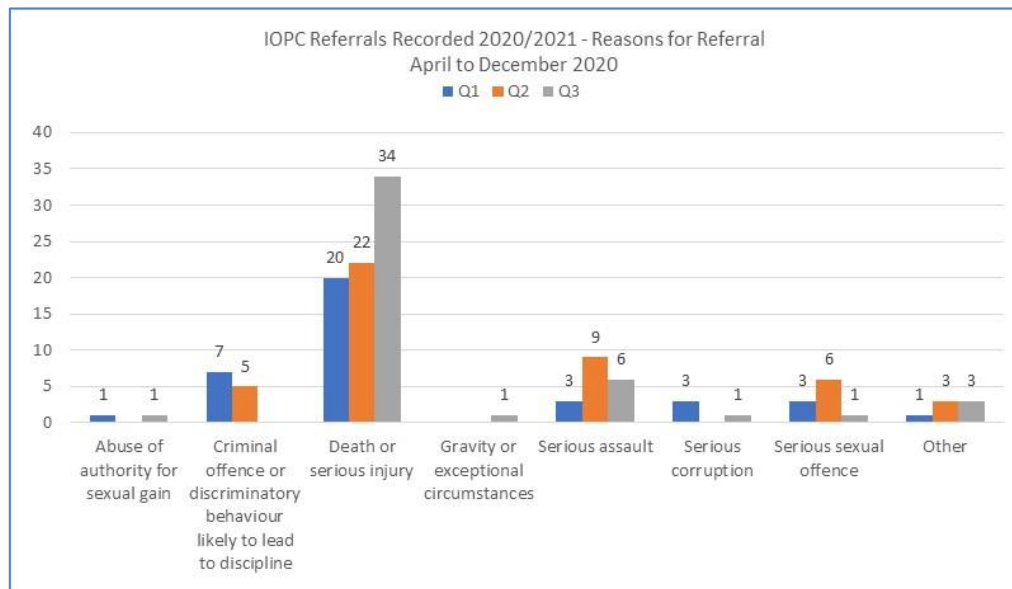
Any serious allegations of wrongdoing could result in officers and staff being suspended. This may only take place if the confidence of the public or potential interference with the investigation overrides the presumption that staff will remain in

the workplace whilst under investigation. There are currently 14 officers and staff suspended. This is made up of 8 police staff and 6 police officers (one of whom is a Special Constable). In order to achieve consistency between staff and officers, all staff suspension considerations are made by the Deputy Chief Constable and are reviewed each month to ensure they remain appropriate.

Referrals to the IOPC

Table A10 shows the type and quantity of referrals to the IOPC. The overwhelming majority is the category of ‘death or serious injury after police contact’. All DSI’s are reviewed by the Appropriate Authority within PSD and any themes or trends are identified and further investigation commissioned if necessary, to review any learning opportunities. 56% of DSI’s relate to incidents in custody, 17% during arrest and 15% due to a DSI after police attendance.

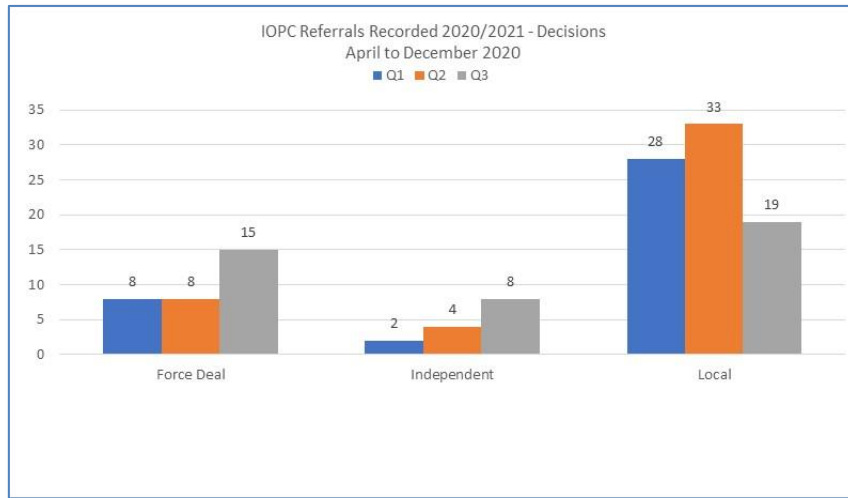
TABLE10



Following referral of a matter, the IOPC method of investigation decision can be either ‘Force Deals’ in whatever way they see fit, a ‘Local’ investigation in force or ‘independent’ where the IOPC conduct the investigation themselves.

Table 11 displays the responses from the IOPC regarding method of investigation. The IOPC ‘key areas of work’ include; DSI’s, discrimination, domestic abuse, treatment of vulnerable people, corruption, armed policing, traffic incidents, custody and child abuse. During Q1 20/21, they announced independent investigations would reduce to ‘core work’ only - essentially cases that involve Article 2 and the most serious Article 3 considerations or had the potential to significantly impact public confidence. Later in Q2 they announced the resumption of their thematic investigations. This accounts for the low number of independent investigations in Q1 compared to Q3.

TABLE 11



Appeals to the IOPC

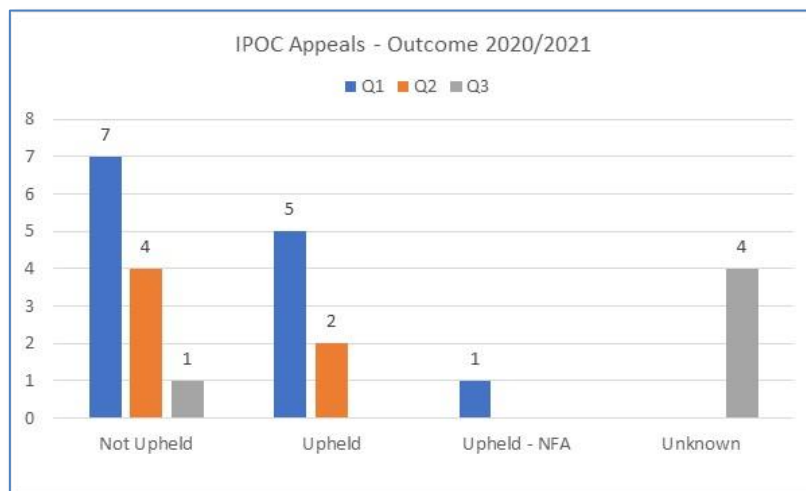
The majority of appeals to the IOPC are where a complainant wishes to appeal the ‘outcome of a police investigation’. However, the number of appeals has reduced over the last three years.

TABLE 12

Financial Year	IOPC Appeals
2018/2019	76
2019/2020	52
2020/2021 (Predicted)	32
Total	152

The outcome of the appeals during the reporting period is shown in Table 13.

TABLE 13



The ‘unknown’ section captures those appeals still outstanding. The amount of appeals remains relatively low and the vast proportion of those are not upheld.

Reviews to the IOPC

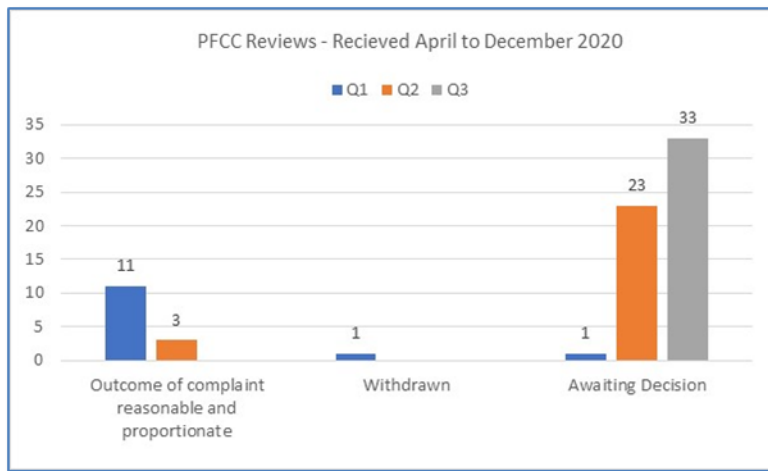
The introduction of the Police Regulations in February 2020 changed the review body for certain categories of complaints from the police to the PFCC. Table 14 shows the number of review requests made by members of public. The rise from Q1 was expected as complaints recorded since the changes have had time to be investigated and finalised.

Table 14

2020-2021	Total	%
Q1	13	18%
Q2	26	36%
Q3	33	46%
Total	72	100%

Table 15 shows the outcomes of the review requests. To date, there have been no reviews upheld.

Table 15



5.2 Current Work in PSD

There are four key areas of focus within PSD. These are; Prevention, Learning, Confidence and Enforcement.

Prevention

Awareness is raised in the organisation via a number of methods. At the conclusion of a gross misconduct hearing, internal communications use this as an opportunity to publish the circumstances so staff and officers are fully aware of the implications of breaches.

A new Quarterly briefing distributed to the force focuses on trends, common complaint themes, also focuses on positive IOPC feedback. This has received positive feedback as a method of understanding all types of matters being referred into PSD.

Relationships with the staff associations (Police Federation, Superintendents Association and Unison) continue to grow. This has enabled constructive interactions

to take place and messaging to be sent out via their correspondence around different conduct trends.

A new dedicated reporting line has been set up which goes straight to the Counter Corruption Unit (CCU) to enable staff to report concerns – this is in addition to the existing confidential online reporting method. More widely, the CCU continue to gather intelligence and identify trends and key areas of concerns, which in turn informs the control strategy for PSD and sets the areas of focus each year. This is completed in conjunction with the National strategic assessment and control strategy.

PSD surgeries have been arranged, where PSD staff visit will locations around the county to engage with the workforce, answer questions, provide assistance (COVID-19 has prevented this for the time being).

Confidence

To Report

This has been helped with the new reporting line into CCU. PSD's relationship with the staff associations has instigated some work on messaging to staff and officers to have the confidence to report matters, particularly in relation to abuse of position/harassment.

Further development this year means that PSD supply the Police Federation details of staff who are witnesses in conduct investigation to Support them as required during any investigations. This ensures that staff who report matters or witness behaviour are supported.

Regular opportunities are used to provide training inputs to staff and officers – including new recruits. Not only does this address the 'prevention' strand, but it also gives confidence that matters will be investigated and treated seriously. CCU have also provided training to external partners, so awareness of possible conduct behaviours enables them to report any concerns into the organisation.

Internal Confidence

The ongoing relationship and witness support programme with the Staff Associations is working towards improving the confidence staff and officers have in PSD.

There is now consistency within PSD around the point at which conduct severity is assessed and in line with further growth (see Section 9.0) this will soon incorporate PSD retaining the police staff investigations. This will work towards ensuring staff and officers can have the confidence they are being treated in a fair and consistent way.

PSD has made progress in becoming more open and transparent to the staff and officers within the organisation. We now provide more information than ever before (briefing document, PSD surgeries and will be holding staff debriefs see Section 9.0).

The timeliness of conduct investigations is traditionally a key area of concern. Historically some PSD investigations have simply taken too long. This has been addressed in 2020/21 through an investment in PSD but also a focus on proportionate

investigations and more timely interviews of staff/officers. This can more quickly establish what investigative route should be taken. The new requirement to report investigations which are over 12 months old ensures this remains a key focus.

The new quarterly Appropriate Authority Forum ensures that AA's from around the force responsible for each Command come together. Part of this forum is to discuss local cases and 'benchmark' opinions. This ensures staff and officers across the force are treated in the same way – assisting in perceptions of fairness. The Deputy Chief Constable also meets with all new AA's to set the initial expectations around standards of behaviour and awareness of key policies.

External Confidence

Improvements have been made in our general communication with the public, including some basic things like the way apologies are written. Best practice has been taken from other forces.

Liaison has taken place between the Force Control Room and Quality of Service Team to ensure the 'first contact' from a member of public expressing dissatisfaction is a positive and efficient one, leaving the complainant understanding the pathway for the matter to be resolved.

A recent feedback exercise has provided Investigating Officers advice on their complaint investigations. The aim is to give the complainant greater confidence when receiving the final report.

Utilisation of CSEO's to engage with their community links to disseminate key messaging from PSD has begun to create a pyramid of endorsement. In the coming year, external confidence remains the key focus – there is more detail in Section 9.

The latest data from the SMSR survey shows overall, 93% of people now think that if they were to make a complaint against Essex police they would be treated fairly. This is a significant increase over Q2 (88%) and the highest on record.

Learning

This is a key area of focus for PSD. Ensuring organisational and personal learning to prevent further instances of misconduct or public complaints is essential. All learning (including good practice) is identified from all reporting streams, such as complaints, Conduct Investigations, Counter Corruption enquiries, IOPC reports and recommendations and PFCC Complaint Reviews. There is a clear structure for embedding this learning. It could be individual learning for a staff member/officer – they can receive this via a debrief, or more formally through Reflective Practice. Learning could be focused on a certain location or command in the force and this is filtered via the Appropriate Authority for that Command. Finally, learning could be force wide, or narrower than this, but applicable force wide. This learning is presented to the force 'Learning the Lessons' board chaired by the Deputy Chief Constable.

The introduction of reflective practice in the new Regulations has been well implemented within Essex. Whilst specific national data is still not available a recent

Home Office paper identified some Forces were yet to formalise the process or deliver a single instance of reflective practice. Current figures for Essex show that as a result of public complaints or instances of low-level breaches of the standards, we have referred 126 officers to 'Practice Requires Improvement (PRI), 61 of which have been finalised. This has resulted in 56 individual learning points, 23 line manager learning points and 12 wider organisational learning. The learning ethos the new regulations introduced has been widely embraced by Essex Police.

Enforcement

The final area of focus for PSD is Enforcement. Whilst this will naturally be the case, it is absolutely right that officers and staff are held to account and formal sanctions against them made, including dismissal if necessary. This enforces the expected standard to our workforce and demonstrates to the public that officers and staff whose conduct falls far below the standards expected are held to account in an open and transparent conduct hearing. The names of dismissed officers also appear on a publicly available barred list. The Deputy Chief Constable as the Appropriate Authority for the force oversees all the communications at the conclusion of hearings to ensure the appropriate prevention, education and public confidence messages are included.

6.0 Implications (Issues)

Previous successful growth bids (2020/21) consisted of two constables and four police staff within PSD enabled sufficient resilience with regards to the new regulations, particularly the growth in the area of complaint recording, but also to enable PSD to investigate all conduct allegations against officers.

This foresight to see the need for growth in 2019 has meant the potential significant implications of the new regulations have not been felt by Essex as much as some forces. For example, the number of complaints awaiting initial assessment is currently 20. In one similar force, they have reported their figure is over 200.

It has been identified in terms of who conducts the investigation, Police Staff are currently dealt with in a different way when subject to misconduct. A successful growth bid for 2021/22 (5x FTE officer posts) will enable PSD to investigate all allegations of conduct for the force. This will provide public reassurance that all allegations are dealt with in the same way, and in turn provide the staff reassurance that allegations are dealt with consistently and fairly.

Part of this growth will provide a second Chief Inspector which will enabling one dedicated DCI for Investigations and one for CCU. The anticipated development of the way PSD contributes towards the organisation described throughout this report will be a key priority for the new DCI growth post.

6.1 Links to Police and Crime Plan Priorities

The PFCC's Police and Crime Plan states we need *"to ensure the public have confidence in their police force"*. The work of PSD in the area of complaints and investigation of conduct ensures that confidence is maintained.

In relation to victims, PSD ensure they have confidence their crime will be investigated properly, and they will receive timely updates. It also gives them a right of redress if that does not happen.

PSD is working to ensure its services are more accessible (priority 1). This public engagement is detailed in Section 9.

The function of PSD underpins priorities such as breaking the cycle of domestic abuse and protecting children from harm. The Police's effectiveness in doing this by giving the confidence to victims to step forward depends on their confidence the matter will be dealt with properly. The complaints and conduct systems ensure we learn from any failings and rightly hold officers and staff to account when their conduct falls below the expectations.

6.2 Demand

The increase in demand has been explained in previous sections. This was a predicted increase and measures were taken in 2019 to ensure PSD were ready to receive this increase. In 2021/22, PSD are looking to increase their capacity further by investigating all conduct investigations. Historically, PSD has only investigated Police officers, and police staff investigations have been dealt with locally.

6.3 Risks/Mitigation

A recognised risk is the lack of national data (via the IOPC) which has meant an inability to compare our performance to other forces. The new legislation has meant dramatic increase in recorded complaints and the inability to compare is problematic. This is now due to be resolved by April with the provision of initial national data from the IOPC. Other mitigation we have taken is to engage with other forces to informally compare increase in complaint recording data. We have also ensured there is regular liaison with the IOPC to discuss any concerns. The IOPC have not raised any concerns with the way Essex is applying the new regulations.

6.4 Equality and/or Human Rights Implications

The new complaint categories enable better analysis of different ethnicities and what is being complained about, against who and where. The formalisation of complaints enables the force to be able to access this information. One area for improvement is the size of the 'unknown' ethnicity of complainants. Whilst not obligatory to provide, a key area of focus now ensures every complainant is asked about their ethnicity. A detailed plan is now in place to ensure this data is collected.

A national area for concern is disproportionality shown against officers and staff from a BAME background in the misconduct process. Essex police submitted data to the NPCC which has contributed towards the publication of a national report. Work to assess this in Essex is being planned to develop our approach (see Section 9)

We continue to ensure that where Human Rights breaches may have taken place (such as death or serious injury) we appropriately refer matters to the IOPC. Regular

liaison around the appropriateness of the referrals Essex Police makes has indicated there are no concerns in this area.

6.5 Health and Safety Implications

One key Health and Safety concern identified via PSD this year is the COVID-19 complaints from members of public – specifically those against officers for not wearing masks or social distancing when interacting with members of the public. Analysis of these has enabled PSD to disseminate this information to relevant commands to address any concerns.

7.0 Consultation/Engagement

Community engagement and consultation with respect to PSD has traditionally been limited. Representatives from the counter corruption unit have engaged with partners to raise the awareness of 'abuse of position for sexual purposes' to encourage reporting. Increasing PSD's public engagement and encouraging commentary on what we do is a primary focus for the coming year, details of which can be found in Section 9.0.

8.0 Actions for Improvement

- In order to better assess complaints from BAME backgrounds, improvement is required regarding the improvement of recording ethnicity of complainants. There is already a clear action plan in place for this.
- HMICFRS set two AFI's for CCU regarding its capacity to properly deal with intelligence enquiries and those involved in abuse of position of trust. Both of these AFI's have been formally closed by HMICFRS at the end of 2020.

9.0 Future Work/Development and Expected Outcome

A Post Implementation Review of PSD's application of the new Regulations is due to be conducted from April 2021, enabled by the IOPC comparable data with other forces.

Fully embed, local level 'learning the lessons' board to enable a full systematic capturing of lessons identified, analysis of themes and enable appropriate dissemination whether that be at an individual or local level. For wider learning opportunities we would engage with the force 'Lessons board' chaired by the Deputy Chief Constable. This will address the prevention and learning culture PSD is striving towards.

As previously mentioned, an increase in growth 2021/22 will enable all conduct matters in the force to be investigated by PSD, providing fairness to all and consistent application of the Regulations, increasing confidence in the system.

Introduction of formal de-briefing of all conduct investigations of witnesses, victims, persons under investigation (where appropriate) to ensure staff involved in investigations are being treated fairly and any learning identified for the future.

The introduction of a scrutiny panel made up of members of public for PSD decision making. The concept is to anonymise cases, present and identify public opinion. This process will be fed into IAG presentations (below). Because the process will be anonymised, it will also assist in ensuring any disproportionality amongst BAME staff/officers is identified as highlighted nationally as an issue.

The engagement with IAG's and other partners in the form of PSD presentations. This will increase awareness of the existence of PSD, the framework they work within, the scrutiny from PFCC and IOPC and raise confidence in the complaints system and establish how better to ensure BAME communities have the confidence to report a matter they are not happy about. This will also increase public confidence in policing given the knowledge of the safeguards in place around the standards under which officers and staff are expected to operate.