Thank you for your letter of 31 July 2018 about the recent report on sexual harassment in the workplace. You asked what work we are doing in this area, and what we plan to do in the future.

2. Our PEEL (police effectiveness, efficiency and legitimacy) inspection programme includes police culture and behaviour; how forces deal with workforce concerns and grievances; and the work of counter-corruption units. These are the areas where we would expect to find evidence of sexual harassment or a culture that facilitates it. While we do not specifically inspect how fire and rescue services respond to sexual harassment, we do assess how well they look after their people more generally.

3. The inspectors of constabulary and fire and rescue services are not regulators. The only hard power we have is to require police forces and fire and rescue services to give us information and access to their premises for the purposes of inspection. Our power is in our voice. The inspection reports we publish lead to improvements in policing and fire and rescue services, helping to keep everyone safer.

Inspecting police culture and behaviour

4. In 2018, as part of the legitimacy element of our PEEL inspections, we are inspecting how well forces set and reinforce acceptable standards of behaviour. We focus particularly on how forces learn lessons from complaint and misconduct investigations and use them to improve standards of behaviour. We also assess how effectively force leaders reinforce standards of behaviour by communicating these lessons to the workforce.

5. The Police (Conduct) Regulations 2012 define the standards of professional behaviour for policing in England and Wales. The College of Policing Code of Ethics (2014) sets out nine policing principles, built on the Nolan principles for public life. Together, the Code and standards of professional behaviour set out how all policing personnel should conduct themselves. When the
standards of professional behaviour are breached, forces assess whether the breach amounts to misconduct, gross misconduct or neither. We inspect forces’ professional standards departments in these areas, and their investigations into internal conduct matters.

6. We use a broad range of information sources to shape our inspection work and draw upon experts from both inside and outside policing. For example, a recent survey by UNISON has reported on experiences of sexual harassment by police staff members across England, Scotland and Wales. The National Police Chiefs’ Council (NPCC) has committed to developing a comprehensive action plan to address the issue of sexual harassment throughout the police service. And UNISON is currently working with the NPCC to develop policy and practice guidance. Our future inspections will be able to consider how well forces are following this guidance. We will work with these other organisations to develop our methodology.

**Inspecting how police forces deal with workforce concerns and grievances**

7. Our inspections assess the extent to which police forces treat their workforces with fairness and respect. This includes how forces identify, understand and address workforce concerns: both informal concerns and those raised through a formal grievance process. We assess the processes forces have in place to understand the concerns of their workforce and what they do to make improvements.

8. We consider whether forces have clear and well-publicised grievance procedures and what information and data monitoring processes are in place. We also consider whether the workforce sees the processes as effective and fair, and if they feel the force would support them if they submitted a grievance.

9. Our inspections collect data on grievances from every force in England and Wales. We also review a small number of grievance cases in each force. This is to assess whether forces handle cases in line with the ACAS guidance (for example mediation where appropriate, or ACAS dispute resolution) and the ACAS Code of Practice on Disciplinary and Grievance Procedures (as issued under section 199 of the Trade Union and Labour Relations (Consolidation) Act 1992).

**Inspecting counter-corruption units**

10. We also inspect forces’ counter corruption units. In 2016, we raised concerns about police officers developing inappropriate relationships with vulnerable people. This behaviour has a devastating effect on the lives of victims, and corrodes the public’s trust and confidence in the police. It includes interactions with members of the public as well as with colleagues in and outside the workplace. At that time, we found that nearly all forces had dealt with or were dealing with cases of abuse of position for a sexual purpose.

11. We stressed the need for a comprehensive national policing response. This should include clear messages about the seriousness of this form of corruption, with an emphasis on prevention.

12. In 2017 the National Police Chiefs’ Council (NPCC) published a national strategy to address the issue of police officers and staff who abuse their positions for a sexual purpose. The purpose of the strategy is to give the police service a framework to respond effectively to this issue. We are aware that the NPCC is currently developing similar guidance on appropriate relationships
within the police service and with their partner agencies (that is, different organisations with whom the service works closely, for example schools and local authorities).

13. We are inspecting all forces on abuse of position for a sexual purpose in our 2018 integrated PEEL inspection programme. We will assess how well forces have responded to the national strategy. We will consider specifically how forces identify those at risk of corruption, how they intervene to remove the risk and how effective this is. This includes what processes forces have in place to make sure staff feel confident in reporting potential corruption.

14. As part of our 2018 inspection, we will review all forces' intelligence case files on abuse of position for a sexual purpose. From this, we can assess whether forces deal with this issue promptly and professionally, and whether they fulfil their statutory obligation to refer relevant cases to the Independent Office for Police Conduct (IOPC).

Inspecting fire and rescue services in England

15. In July 2017, the then Home Secretary announced that we would become the inspectorate for fire and rescue services in England as well as for the police service. Inspections are now under way, with the first reports due for publication by the end of 2018.

16. As part of these inspections, we are assessing how well services look after their people. This includes considering fire and rescue services' values and culture; whether they have well-understood and effective health, safety, wellbeing and dignity at work policies, and grievance procedures; and how well they promote equality and diversity and engage with underrepresented groups in the workforce.

Sir Thomas Winsor
Her Majesty's Chief Inspector of Constabulary
Her Majesty's Chief Inspector of Fire and Rescue Services