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**Enquiries to: Mrs J Head**  
**Telephone: 01768 217734**

**Our reference: JH/EIP**

**Date: 19 August 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 31 August 2022** at **2.00 pm** in **Conference Room 2**, Police Headquarters, Carleton Hall, Penrith.

**G Shearer**  
**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**

<b>Number</b>	<b>Agenda Item</b>	<b>Allocated Time</b>
<b>4.</b>	<b>NOTES OF THE PREVIOUS MEETING</b> To confirm the restricted notes of the meeting of the Ethics and Integrity Panel held on 27 May 2022 (copy enclosed).	
<b>5.</b>	<b>CORPORATE UPDATE</b> To receive a briefing from DCC Carden and OPCC Chief Executive Gill Shearer	15 minutes
<b>6.</b>	<b>INTEGRITY</b> To receive a report on the work carried out within the Constabulary's Professional Standards Department, including Complaints by the Public; and Anti-Fraud & Corruption (including officer and staff misconduct) – <i>to be presented by Chief Inspector Hayley Wilkinson and D/Inspector Simon Gray or Complaints &amp; Misconduct Manager (Mr Barry Bell)</i>	15 minutes
<b>7.</b>	<b>VIOLENCE AGAINST WOMEN AND GIRLS</b> To receive a copy of the updated action plan and report upon the work being carried out by the Constabulary - <i>to be presented by D/Superintendent Sally Blaiklock</i>	10 minutes

8.	<p><b>CONTACT WITH THE PUBLIC</b> To receive an update on the work being carried out to develop the Constabulary's Race and Inclusion Plan – <i>to be presented by Inspector Siraaz Patel.</i></p>	20 minutes
9.	<p><b>STOP AND SEARCH</b> (a) To receive an annual report on Stop and Searches made by the Constabulary during 2020-21 – <i>to be presented by Chief Superintendent Matt Kennerley and C/Insp Jon Sherlock</i> (b) The Panel to provide feedback from the Stop and Search dip sample session.</p>	15 minutes
10.	<p><b>TASER / USE OF FORCE</b> (a) To receive an annual report on the Constabulary's usage of TASER, training and future developments within the force – <i>to be presented by Firearms Policy &amp; Skills Manager (Mr Paul Telford)</i> (b) The Panel to provide feedback from the TASER/Use of Force dip sample session.</p>	15 minutes
11.	<p><b>INFORMATION MANAGEMENT COMPLIANCE</b> To receive and note a report by Cumbria Constabulary on their compliance with Data Protection Legislation (copy enclosed) – <i>To be presented by Chief Information Officer (Jo Edgar).</i></p>	5 minutes
12.	<p><b>INFORMATION MANAGEMENT COMPLIANCE</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>	5 minutes
13.	<p><b>FORWARD WORK PLAN</b> To discuss with the Panel work for the next meeting to be held on 3 November 2022.</p>	10 minutes

## Agenda Item No 04

### ETHICS AND INTEGRITY PANEL

Notes of a meeting of the Ethics and Integrity Panel held on  
Friday 27 May 2022 in Conference Room 2, Police Headquarters, Penrith at 9.30 am

#### PRESENT

Mr Alan Rankin (Chair)  
Mr Michael Duff  
Mr Alex Rocke

#### Also present:

T/Deputy Chief Constable – Rob Carden  
Chief Superintendent Lisa Hogan  
Superintendent Dave Stalker  
Detective Chief Inspector Craig Smith  
Head of Legal Services – Andrew Dobson  
Inspector Lizzie Mitchell  
OPCC Chief Executive – Gill Shearer  
OPCC Governance Manager - Joanne Head

The Chair welcomed T/DCC Carden to his first meeting of the Ethics & Integrity Panel. He and the other Panel members introduced themselves.

Prior to commencing the meeting the Chair wished to raise the issue of papers being received late by the Panel. This was particularly concerning given that the meeting had been re-scheduled three weeks later and therefore the papers should have been ready in time. Consequently it made it difficult for the Panel to read through all the information provided.

#### 11. APOLOGIES FOR ABSENCE

Apologies for absence were received from Ms Jane Scattergood

#### 12. DISCLOSURE OF PERSONAL INTERESTS

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

#### 13. URGENT BUSINESS

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

#### 4. NOTES OF THE PREVIOUS MEETING

The notes of the meeting held on 10 February 2022 previously circulated with the agenda were agreed.

**Agreed;** that, the notes of the meeting held on 10 February 2022 were agreed

#### 5. 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.

Members noted the number of active and closed cases during the past six months. There were currently 4 Active Claims, 6 of the previous 8 had now been closed and 2 new significant claims had been identified.

Since November 2021 the Constabulary had concluded 33 Public Liability claims (PL) of which approximately 58% had resulted in no payments being made. Of the remaining 14, 4 had resulted in payments of less than £5,000. No new Employer Liability (EL) claims had been received during the past 6 months and 6 cases were currently active.

Several ongoing cases were discussed regarding what stage they were currently at and whether the estimated potential costs had remained the same. Some of the claims related to issues encountered on a national basis and therefore Legal Services were liaising with other forces.

The Panel notes that a number of the claims were linked to public complaints received by the Professional Standards Department in relation to lost or damaged property. This matter had been raised in late 2020 and during 2021 and the Panel were concerned that this was again becoming an issue and trend. Dealing with such claims and complaints took time and effort and previously the Panel had raised concerns regarding the impact seizing a mobile phone had on victims and witnesses due to time taken to obtain evidence. Superintendent Stalker advised that the Constabulary followed national procedures to only seize telephones where necessary and to retrieve and return the device as quickly as possible.

The OPCC Chief Executive recognised that this issue had been raised a number of times by the Panel and therefore suggested that work be carried out to identify the trends and seek to identify whether the complaints and claims were from victims/witnesses of crime or perpetrators

**Agreed;** that, the

- (i) reports be noted; and
- (ii) the OPCC Chief Executive and T/DCC Carden discuss what work is to be carried out to review the matters raised in the civil claims and complaints

in relation to lost or damaged property and report to the August meeting.

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

## 16. OFFICER & STAFF UPDATE

### Operation Uplift

Superintendent Stalker presented the latest data in relation to Operation Uplift including current levels and future forecasts. It was noted that the Constabulary had achieved its targets during the first two years and were due to uplift by a further 30 officers by the end of 2022. Future intakes remained flexible to account for the new officers and officers to replace those who retired or left the force. The completion of medicals and vetting processes were causing some delays in new officers being processed.

It was noted that there had been an increased attrition rate of officers who had served between 5 and 15 years but that no distinct trends were being seen. A number of large employers within the county were carrying out recruitment programmes, such as Sellafeld and BAE Systems. It was also important to understand the reasons behind officers leaving. A member asked that due to the process recruits went through to join the Constabulary the new officers should be aware of what was required of them. A Task and Finish Group had been created to look at the reasons why officers were leaving the force and try to identify any trends. Superintendent Stalker advised that the Constabulary would be returning to the more traditional Initial Police Learning and Development Programme (IPLDP). Many forces in the Northwest and across the country were returning to this approach in order to attract new recruits as it did not have the same academic challenge for officers. T/DCC Carden advised that this was a national issue which was due to be discussed at a meeting the following week.

The Constabulary made every effort to plan their intakes during the forthcoming year taking into account those who were due to retire. However, officers who made a decision to transfer to another force could not be catered for but would need to have replacements found. The Panel asked what Cumbria was doing to compete with other forces to attract new recruits and highlight what Cumbria had to offer. T/DCC Carden advised a number of avenues were being used including speaking with universities and students.

With 244 new officers within the Constabulary, it was recognised that 20% of the overall workforce had less than 2 years' service and the Panel asked what, if any, impact this placed upon the force. T/DCC Carden advised that this was a national issue as all forces were recruiting. The ratio of police officers to sergeants was 1 to 4 which was very low, however it was important to ensure that the Constabulary got value for money using this approach.

An impact of the PQEF programme was abstraction of officers from the front line and it was noted that 35 days had been removed from the programme. A member asked what had forced this change and were advised that an imbalance between academic and operational requirements was having an impact. The Task and Finish Group were looking at the impact upon those officers on shifts and the workload required to be carried out, asking supervision to

put measures in place with officers before extraction about their casework, ie what could be delayed and what needed to be reassigned during the abstraction. This did not detract from the fact that officers would not be available to work and would increase pressures and demand on the remainder of the shift.

### Officer & Staff Absences

Superintendent Stalker advised that sickness levels were returning to those seen prior to the COVID pandemic. When asked if there were any trends or concerns, he advised that the psychological disorder made up the largest proportion of absences. Work had been carried out to develop a buddy system to assist in coming back to work.

When reporting sickness there was the ability to not disclose the reason for sickness absence. To assist the Constabulary to understand officer and staff health issues this was being addressed during the return-to-work interview when it could be 're-categorised' to provide tailored support if necessary and enable the Constabulary to fully understand the head issues of the force. The Panel asked what the top 5 absence types were and what the Constabulary were doing to address them. A discussion took place on these and to be included within future reports.

A member asked whether any analysis had been carried out in relation to the length of service of the officers who were absent. Superintendent Stalker advised that he did not have that information to hand but would include it within the next report in November. If there were early warning signs that officers were being affected by their work, the Constabulary may be able to put interventions in place and reduce officer attrition rate. It was also felt that some new officers were recruited during COVID and therefore not fully exposed to all areas of work within communities.

**Agreed;** that,  
(i) the report be noted;  
(ii) future reports to identify the top 5 absence types and what the Constabulary is doing to address them; and  
(iii) information regarding length of service of officers who were absent to be provided within the report for the November meeting.

## **17. GRIEVANCES**

The Panel Chair provided a summary of the finalised cases the members had seen as part of their six-monthly dip sample process, and they had noted a number of cases related to terms and conditions. In response to a question Superintendent Stalker advised that prior to the introduction of the CROWN system, ad-hoc payments such as overtime and on-call were dealt with at a local level.

The CROWN system had streamlined such processes and changes had been made which staff may have not understood. Cumbria had previously utilised local conditions but that there was

now a wish to utilise national conditions and therefore negotiations were taking place with Unison regarding this.

**Agreed;** that the report be noted.

## 18. VIOLENCE AGAINST WOMEN AND GIRLS

Chief Superintendent Hogan updated the Panel on the work being carried out by the Constabulary in response to the national programme of Violence Against Women and Girls. Work was being carried out nationally by the National Police Chiefs Council (NPCC) and the work of the Constabulary complimented that work.

A joint VAWG and OPCC group had been set up and chaired by the Victims Charitable Trust chaired to provide further independence. This group would carry out scrutiny and feedback on their findings to the Constabulary and OPCC. A lesson plan was being developed for student officers and this would also be rolled out across the organisation. Roadshows had taken place across the Constabulary and officers were asked about their understanding. Following these a webpage had been developed on the Constabulary's intranet which acted as an information depository for officers and staff.

Following a member's question, Chief Inspector Smith confirmed to the Panel that the Constabulary had undertaken a review of all cases where sexualised behaviour or inappropriate relationships of officers had been a feature in the past 6 years. HMICFRS had subsequently carried out a review of the past 4 years, the report from which was due to be published in September 2022. Both reviews confirmed that all matters had been robustly investigated and all avenues of enquiries had been made.

The Constabulary had appointed a Diversity and Prevent officer whose responsibility it was to identify individual and organisational learning; whilst promoting the Constabulary's expected standards with regards to APSP and inappropriate relationships. Where officers were promoted within their own shift, expectations and responsibilities needed to be highlighted and re-affirmed.

**Agreed;**

- (i) that the report be noted; and
- (ii) the panel be provided with an update and updated action plan on the work being carried out at their next meeting.

## 19. CONTACT WITH THE PUBLIC REVIEW

Chief Superintendent Hogan presented the finalised report from the work carried out by Anti-Racist Cumbria during 2021. The report highlighted their findings and contained recommendations which the Constabulary were currently working through. Representatives from Anti-Racist Cumbria were programmed to return to the Constabulary at the end of June to discuss their findings and assist in the development of the action plan. It was important that any way forward did not marginalise any officer, member of staff, partner or members of the communities served by the Constabulary.



During discussions it was recognised that training in relation to equality and inclusion should be delivered face-to-face rather than via an E-learning package. This enabled subject expert trainers to deliver the training, putting it into context for officer/staff and answering any questions. It could also dovetail into the Constabulary's Conscious Inclusion Accreditation Programme.

Appended to the report was a copy of the HMICFRS – Disproportionate Use of Police Powers report which was published in early 2021. The report placed a spotlight on stop and search and the use of force within all police forces. In early May as part of the Panel's dip sample programme the members had reviewed some stop and search forms and the use of force forms. It was agreed that the Panel would increase the frequency from annually their dip samples in this area of business and would be added to their work programme.

The OPCC Chief Executive asked that as the action plan was developed this was regularly reported to the Panel to enable them to have oversight of the work being carried out. She also advised on the importance of ensuring officers and staff had a clear steer on the changes, the rationale behind them, and the organisation's expectations during the process.

- Agreed;** that,
- (i) the report be noted;
  - (ii) the frequency of Stop and Search and the Use of Force dip samples be increased from annually and included within the Panel's work programme;
  - (iii) an update on the developing action plan and work being carried out to be reported to the Panel at their next meeting; and
  - (iv) update on the Constabulary's Conscious Inclusion Accreditation Programme be provided to the next meeting.

## 20. INTEGRITY

Chief Inspector Smith guided members through the Integrity report which had been circulated to the Panel prior to the meeting. There had been a reduction in the number of complaint cases during quarter 4 which was attributed to a reduction by 7.4% of incidents dealt with by the Constabulary.

The Panel noted that there had been an increase from 9 cases to 19 cases of complaints relating to the handling or damage to property or premises during the last quarter. The majority of these sat within the North TPA with a rationale being that often officers were not experienced in dealing with property. C/Insp Smith advised that 2 of the complaints were de-recorded and 15 were resolved through service recovery. When asked by a member C/Insp Smith advised that due to rising living costs, where items or property were damaged members of the public were not financially able to repair or replace and were therefore making claims against the Constabulary. As part of their role, the PREVENT officer was looking at such themes, drilling down into the data to identify any individual or organisational learning.

The Chair provided feedback on the complaint cases they dip sampled earlier in the month. Generally, most were well handled, and a significant improvement could be seen with the use of Body Worn Video footage assist in complaint handling.

In relation to misconduct cases the Panel noted that 57.1% of cases related to off-duty conduct. The majority of issues related to young in-service officers and it was recognised that due to officers progressing that line managers were often young in service themselves with officer attrition rates compounding this factor. The members asked whether future reports could include the top 5 conduct issues and any work being carried out by the Constabulary.

The Chair provided feedback on the conduct cases which they had dip sampled. A number of which had involved driving accidents. C/Insp Smith advised that where appropriate officers would undertake driving training as part of the PRI process. Deputy Chief Constable Carden advised that the Constabulary had a driver standards panel to ensure standards across the force.

**Agreed;** that,  
(i) the report be noted; and  
(ii) future reports include the top 5 conduct issues and any work being carried out by the Constabulary.

## 21. DIP SAMPLE FEEDBACK

In addition to the feedback provided during the meeting the Panel Chair also updated the meeting on the Mental Health Detention, Stop and Search and the Use of Force cases which had been reviewed.

In relation to Mental Health Detention, all the cases reviewed by the Panel had been very good with one case in particular being exemplary. The level of detail provided within the custody records clearly demonstrated the care and attention that such detainees received whilst waiting to be transferred to health care providers. It was recognised that due to the reduced number of facilities across the country this could often result in prolonged waiting times for detainees. The Panel asked that their feedback be provided to the custody staff.

With regards to Stop and Search, the members reported to the meetings their findings from those cases dip sampled, with the majority of them being of good quality. Two Use of Force cases had been reviewed with one being good and the other had a number of issues which were fed back to the relevant department at the time.

As previously advised the OPCC would look at the latest HMIC PEEL report to identify any areas of business with which the Panel could assist. These would then be added to the Panel's work programme.

**Agreed;** that  
(i) the updates be noted;

- (ii) the Panel's comments be fed back to custody staff; and
- (iii) identified areas of business within the PEEL report which the Panel could assist with be added to the work programme.

## 22. 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 18 requests, illustrating a 38% increase compared to the same period in 2021. An average of 6 requests per month were being received taking an average of 20 days to complete.

From 1 October 2021 to 31 March 2022, OPCC received 320 QSPI'S, 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 – miscellaneous, police service dissatisfaction, crime and anti-social behaviour. 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 from the first 6 months data obtained the Safer Streets work was not displacing issues to other areas once work had been carried out. The Pathway programme which aims to listen to both victims and prevent offenders returning to crime was required to provide statistical analysis of its services, which were positive.

**Agreed;** that, the reports be noted.

**Meeting ended at 11.45 am**

**Signed:** \_\_\_\_\_  
Panel Chair

**Date:** \_\_\_\_\_



# Violence Against Women and Girls (VAWG)

- Cumbria VAWG strategy in place, review due in autumn 2022
- VAWG embedded into violent crime strategy, Force management statement and all relevant policies
- Governance structure for VAWG reports to Force Operations board.



- Tactical plan set using 3 VAWG pillars
- Operational owners set for each pillar.
- HMICFRS, NPCC, and Cumbria aspirational outcomes set.



- VAWG board created with monthly reviews of tactical plan.
- VAWG scrutiny panel due to meet Sept 2022.



- Cumbria tactical plan reviewed by VAWG taskforce - positive direction.
- All NPCC data returns met
- Tactical plan monitored on Force CCIP plan for compliance

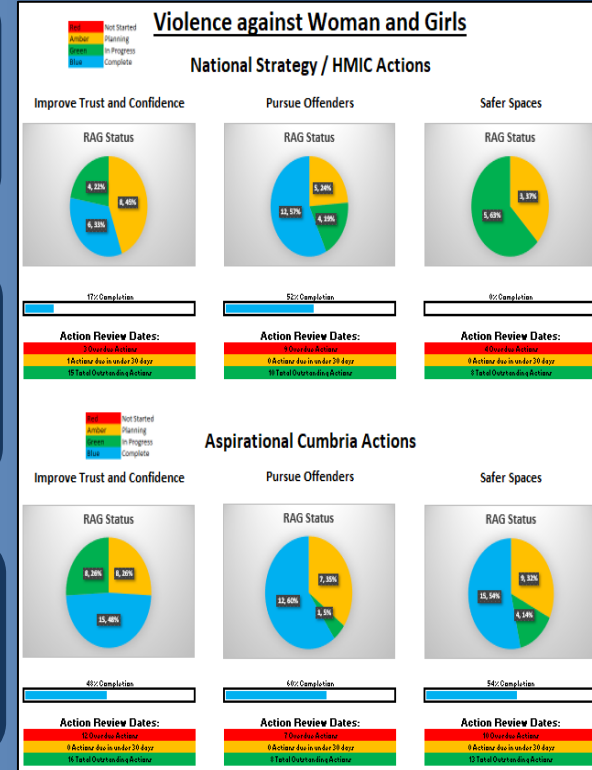


- VAWG Webpage and Yammer created including NPCC toolkits.
- QR keyrings for quick links to tool kits
- National and local press coverage Aug 2022.



Strategic Lead:  
D Supt Sally Blaiklock  
Sally.Blaiklock@cumbria.police.uk

Tactical Lead:  
D Inspector Matt Belshaw  
Matthew.Belshaw@cumbria.police.uk



# Violence Against Women and Girls (VAWG)



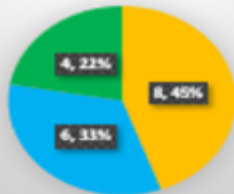
## Violence against Woman and Girls



### National Strategy / HMIC Actions

#### Improve Trust and Confidence

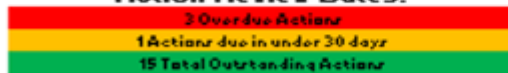
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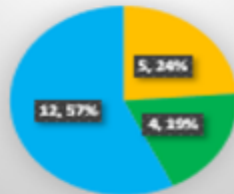


#### Action Review Dates:



#### Pursue Offenders

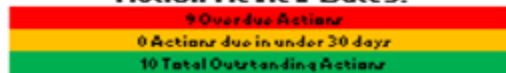
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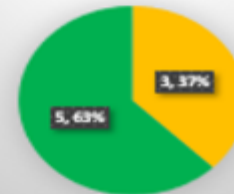


#### Action Review Dates:



#### Safer Spaces

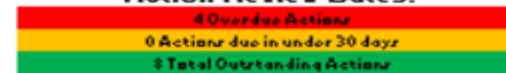
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#### Action Review Dates:

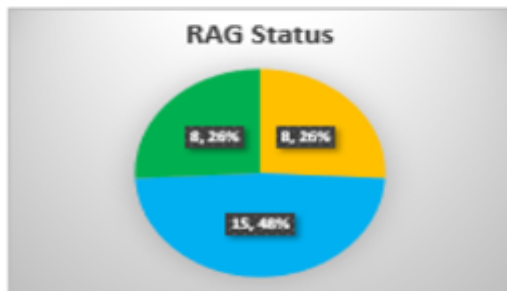


# Violence Against Women and Girls (VAWG)



## Aspirational Cumbria Actions

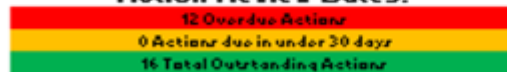
### Improve Trust and Confidence



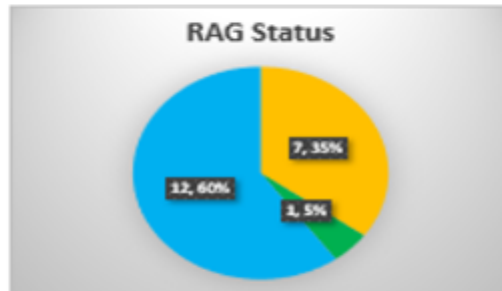
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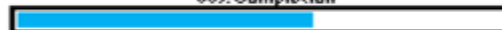
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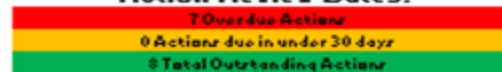
### Pursue Offenders



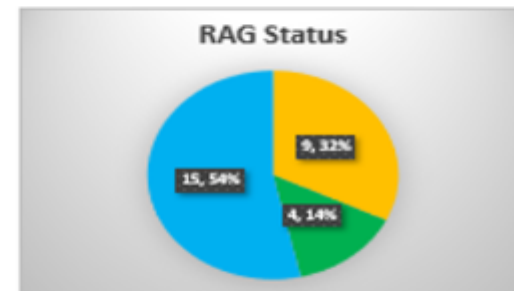
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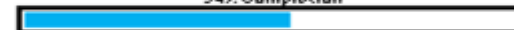
#### Action Review Dates:



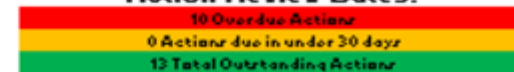
### Safer Spaces



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#### Action Review Dates:



# Violence Against Women and Girls (VAWG)

## Key Achievements 2022



- New governance structure and dedicated tactical lead from July
- VAWG champions in force recruited

- Victims Charitable Trust scrutiny panel. TOR agreed and will go live in September
- Themed reviews with a victim focus
- 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 due to be delivered to student officer training and operational officers on training days
- Women's centres in Cumbria working with VAWG champions

- Media campaign will launch by DI Belshaw in August 2022.
- Monthly VAWG media on the 3 pillars planned for each month



**Police Race Action Plan**  
Improving policing for Black people

A photograph of a sunset over a green landscape. The sun is low on the horizon, creating a bright orange and yellow glow in the sky. The foreground is a lush green field with some trees in the distance.

# **Diversity, Equality and Inclusion input on the National Race Action Plan**







## Police Race Action Plan

Improving policing for Black people

### 2021 George Floyd

Murdered by a police officer in America, causing protests across the world and starting the **Black Lives Matter** movement

### 1993 Stephen Lawrence

Murdered by a gang of white youth in an unprovoked attack. The youths were acquitted.

**2022 May**  
**NPCC Race Action Plan**  
*first iteration*

## TIMELINE OF EVENTS IMPACTING CUMBRIA

### 1998 MacPherson Report

Report published on findings from the Stephen Lawrence investigation identifying institutional racism in policing and actions to address them.

The actions were found, in the Race Action Plan in 2022, to have not been implemented.

### 2020 Op Leaf and Op Branch

## Police Race Action Plan

Improving policing for Black people

**2020** (May) PS Siraaz Patel appointed to position of Positive Action Coordinator. Appointment due to identification of low uptake from minoritised communities.

**2021** (May) Identification of local community tension through racial disparities (covid tickets)

**2021** (September)  
ARC presented their findings from their independent audit

**2022** (May)  
**NPCC Race Action Plan**  
*first iteration*

### TIMELINE OF EVENTS IMPACTING CUMBRIA

**2021** (June) Partnered with ARC for an internal Cultural audit to identify and address any disparities and learning opportunities

**2022** (April)  
HMICFRS PEEL Inspection report

**2021** (September)  
ARC Actioned to create an action plan to address their findings

**2020** (May) – **Present**  
Implementation of:

- Positive Action
- Further Diversity Boards
- Scrutiny Panels
- Specific minority community engagement

## ARC Partnership 2021

### Background

- Partners

### Phase

- Internal Audit
- Report
- Action Plan



## What ARC are proposing:

*In line with what we have identified is needed*

### Culture change:

- Training
- Leadership
- Engagement
- Representation
- Consistent and driven



## Plan on a page 2022

### Vision

A police service that is anti-racist and trusted by Black and Brown people.

### What

NPCC and College of Policing are releasing a new police action plan that aims to address the significantly lower levels of trust and confidence among some Black people and the race disparities affecting Black people.

### Why

The legitimacy and effectiveness of UK policing is built on relationships between the police and the public but there are long-standing challenges in our relationship with Black people. Levels of trust and confidence are significantly lower among some Black people and racial disparities exist that we cannot fully explain.

## Plan on a page 2022

### How

#### Our Commitments (Agreed to by Chief Constable Michelle Skeer QPM)

- 1 Zero tolerance of racism in policing.
- 2 Policing will adopt an 'explain or reform' approach to address the negative impact and outcomes experiences by Black people.
- 3 We will increase the awareness and understanding of every officer and member of staff of racism, anti-racism, Black history and its connection to policing through introduction of a mandatory programme of training for all police officers and staff.
- 4 Policing will increase the involvement of Black communities in its work and improve support to Black victims of crime.
- 5 Enable Black people to have their voices heard, raise concerns, work on solving problems in their community and provide feedback and improve support to black victims of crime.

# Outcome framework

## A police service that is anti-racist and trusted by Black people

An anti-racist police service requires us to tackle racial disparities in policing proactively, to not exacerbate racial disparities that may exist elsewhere in society, and to be continually alive to issues of race and racism. We are responsible for making sure Black people feel...

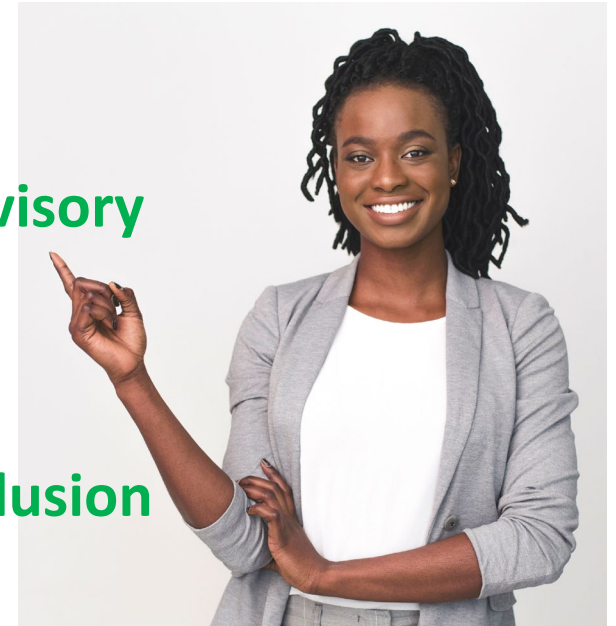






**Police Race Action Plan**  
Improving policing for Black people

- ✓ **Ethics and Integrity Board**
- ✓ **One Change**
- ✓ **Confidence and Equality Board**
- ✓ **Strategic Board**
- ✓ **Inclusion Allies**
- ✓ **Positive Action Strategy Action**
- ✓ **ARC Cultural Audit**
- ✓ **ARC report**
- ✓ **ARC action plan**
- ✓ **Faith Based Tac Advise Service**
- ✓ **Inclusion Allies**
- ✓ **Fortnightly Online live recruitment events**
- ✓ **Buddy System**
- ✓ **Strategic Independent Advisory Group**
- ✓ **Valuing Individuals Group**
- ✓ **Equality, Diversity and Inclusion Strategy**



# First NPCC deadline

## August 28<sup>th</sup>

*Feedback stage*



# Police Race Action Plan

Improving policing for Black people

Showing 25 of 33

Export

33

TOTAL RESULTS

39.3K

TOTAL REACH

55.6K

TOTAL IMPRESSIONS

240

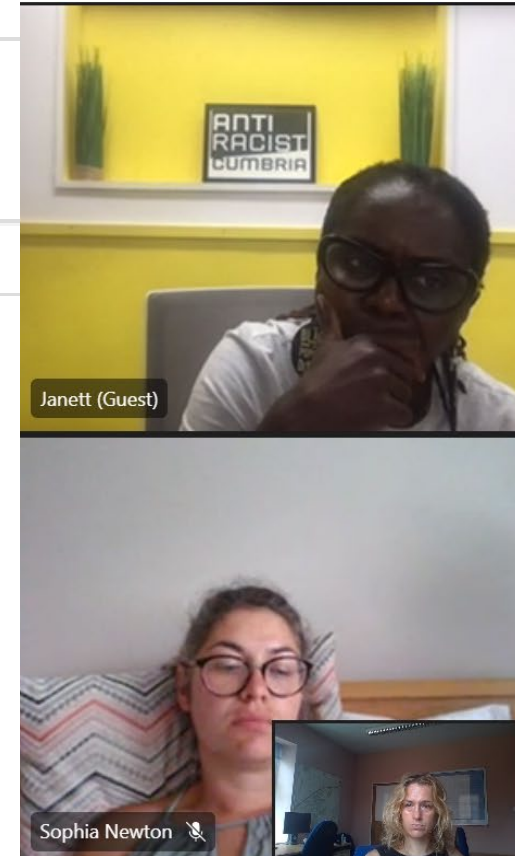
TOTAL CLICKS

13

TOTAL COMMENTS

40

TOTAL LIKES



## Police Race Action Plan

Improving policing for Black people

### Involved

1. ARC and CCMPA training – supported by CCMPA (internal) SIAG\* external
2. ARC and CCMPA training – supported by CCMPA (internal) SIAG\* external
3. Multifaith Tac Advice Service, SIAG and AIG. Proactive support brief and in ARC and CCMPA training
4. IAG and CCMPA led by DEI Manager
5. Frontline officers, PSD

\*45% of the SIAG are Black and Brown

### Involved

A police service that routinely involves Black people in its governance

- Accepting the impact of historic policing practice, which has led to community trauma and distrust of the police.
- Understanding the frustrations of Black people about the slow speed of change
- Responding to community trauma and reconciling police/community divisions
- Involving Black people in our oversight and scrutiny processes proactively and as a matter of course
- Making sure Black people:
  - Can influence our decisions at different stages in the process
  - Are able to voice their opinions, to which we listen and take into account
  - Receive timely and meaningful information from us about our decisions and how we were reached them
  - Have opportunities to review our decisions and have appropriate means of redress
  - Are treated with dignity and respect



# What's next...



**Police Race Action Plan**  
Improving policing for Black people





**Operations Board**

**Stop and Search Annual Performance Report**

**Reporting Period 01<sup>st</sup> April 2021 to 31<sup>st</sup> March 2022**

**A/Inspector 1878 TAYLOR**

### **Executive summary**

The total number of stop and searches FYTD 2021/2022 has decreased across the Constabulary when compared to FYTD 2020/2021 data.

With the Constabulary recording a total of 2224 searches, a significant decrease from the same FYTD period when 3595 searches were conducted: an overall decrease of 1371.

<b>YEAR NAME</b>	<b>#STOP SEARCHES</b>	<b>#ARRESTS</b>	<b>%ARRESTED</b>
<b>2021/22</b>	2224	383	17.3%
<b>2020/21</b>	3595	614	17.1%
<b>2019/20</b>	2120	344	16.2%



All three Territorial Policing Areas (TPAs) have decreased, with North TPA accruing 827, South 589 and West 706 respectively. These figures remain broadly identifiable across most demographics and searches by officers.<sup>1</sup>

Whilst the number of stop searches has reduced from the previous year, the numbers have become more synchronised with pre-COVID-19 levels. The previous closures and restrictions on licensed premises, public and private meetings and closure of many non-essential retailers was purported to be a reason for officers in the previous year to have more time for proactive and targeted policing opportunities. As Cumbria returns closer to normality this could be an indication as to why stop and searches have reduced to previous levels.

Arrest rate is still considered a marker of success. As evidenced the number of searches resulting in arrest across the constabulary decreased significantly from 614 (17.1%) to 383 (17.3%), a decrease of 231 arrests, but this decrease is in line with the overall drop in stop searches and is evidenced in the percentages which shows a continued similarity.

The data demonstrates how the proportion of searches resulting in a positive outcome has remained level despite the drop in actual searches conducted across the constabulary and demonstrates an application of more targeted and specific use of stop and search powers which is linked to priorities raised at Tasking and Coordination meetings such as rural crime and county lines drug trafficking.

All discussed, all three TPAs have lower numbers in their use of stop and search from previous years.

- North conducted 827 searches, resulting in 122 arrests (14.7%) and 236 having positive outcomes (28.5%)
- South conducted 589 searches, resulting in 141 arrests (23.9%) and 194 having positive outcomes (32.9%)
- West conducted 706 searches, resulting in 111 arrests (15.7%) and 190 having positive outcomes (26.9%)

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<sup>1</sup> It was identified that 102 searches included in the overall total had a blank/unknown TPA at the initial point of data collection. For openness and transparency this data will be included in overall statistics and also separated for comparison during this report.

- Unknown/blank TPA were 102 searches, resulting in 9 arrests (10.5%) and 15 having positive outcomes (14.7%)

The main reason for searching continues to be misuse of drugs, in particular possession followed by supply of drugs and then offensive weapons.

The Red Sigma stop and search platform allows for officers to directly input the details onto the ICT system and can be uploaded by officers direct from their hand-held devices which assists with immediate recording of searches compared with the traditional paper version or inputting at a desktop at a police station. A newly designed and implemented Power BI system has also been introduced to aid analyst and data and now includes gender as well as age and ethnicity.

## **National Picture**

*The below statistics are the most recent national statistics and continues to act as a useful contextual comparator.*

Police powers and procedures, England and Wales, year ending 31 March 2021 –

- There were 695,009 stops and searches conducted under section 1 PACE (and associated legislation) by police in England and Wales (excluding Greater Manchester Police who were unable to provide complete stop and search data during this reporting period, but this now includes the British Transport Police). This was an increase of 135,808 (24%).
- This is the highest number of stops and searches since 2013/14 (872,518), but 53% below the peak number of in 2010/11 (1,179,746).

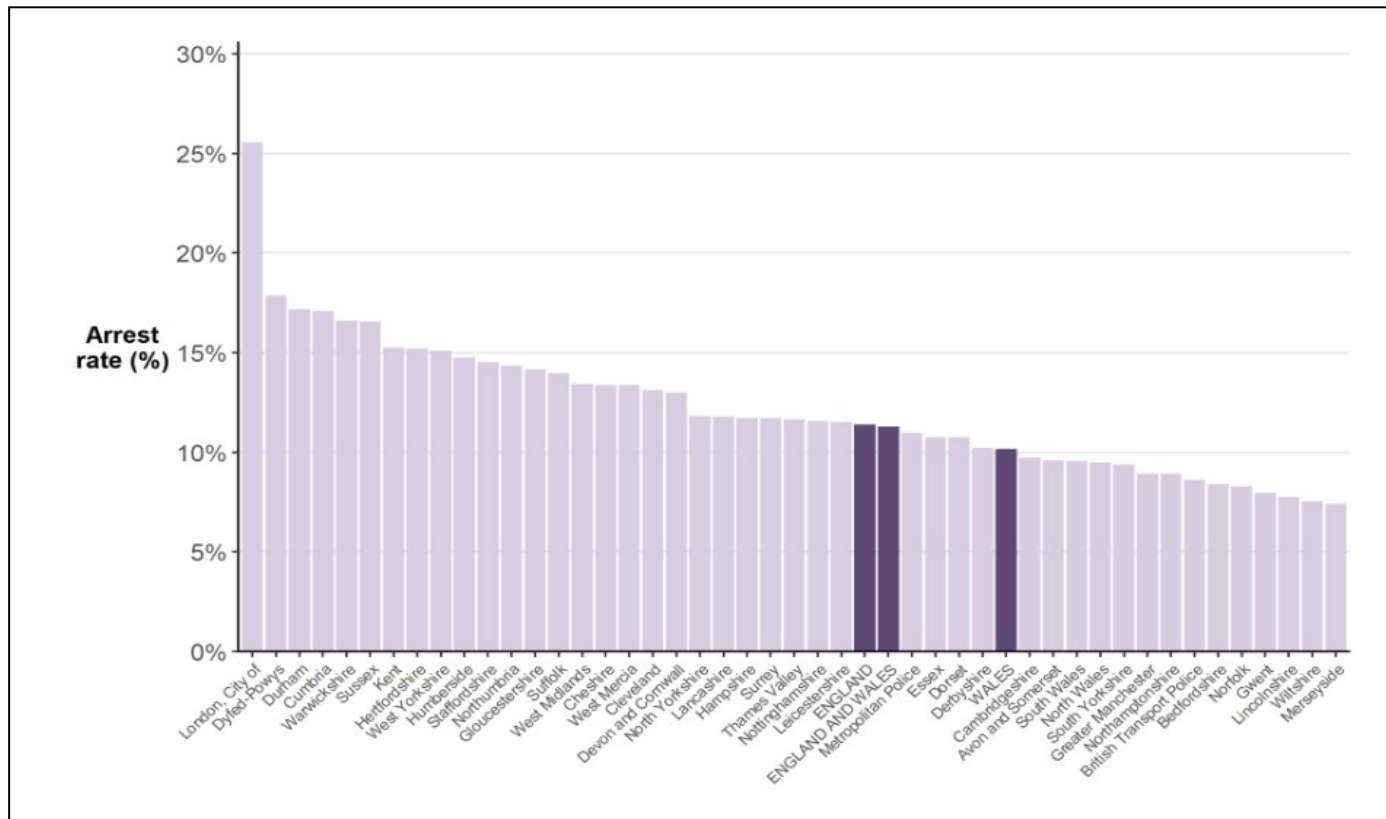
- Of those conducted under section 1 PACE (and associated legislation), 79,391 led to an arrest. The arrest rate has fallen from 13% to 11% and in 77% of stop and searches nationally the outcome was recorded as 'No Further Action' which is similar to previous years.
- Police in England and Wales carried out 9,230 stops and searches under section 60 of the Criminal Justice and Public Order Act which is a 49% decrease when compared with the previous reporting year when 18,043 searches were undertaken.
- Individuals from a Black or Black British background were stopped at a rate 7.0 times higher than those who were from a White ethnic group and individuals who identified as Asian or Asian British were searched at a rate 2.4 times that of those from a White ethnic group.<sup>2</sup>

## **Cumbria Constabulary**

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<sup>2</sup> Source: Home Office Report on Stop and Search for Year Ending March 2021 are the latest data available. The data for year end March 2022 are due to be released on 27<sup>th</sup> October 2022. For the above 2021 statistics, please see: [Police powers and procedures: Stop and search and arrests, England and Wales, year ending 31 March 2021 second edition - GOV.UK \(www.gov.uk\)](#) The Accessed 16/08/2022

In comparison with other constabularies (including the British Transport Police), Cumbria Constabulary has the fourth highest arrest rate for stop and searches, behind Durham, Dyfed-Powys, and the City of London.



During 2020/2021 FYTD, the stop and search recording system has fully relocated to the Red Sigma platform. This will ultimately allow for a comprehensive review and recording of searches undertaken by officers. The ambition going forward remains for the Power BI product to allow for real time review. Previous issues and significant lags have now been fixed and the Power BI product is regularly utilised throughout the constabulary.

Red Sigma continues to incorporate system alerts which allow the Child Centred Policing Teams to be informed of any stop searches of children, enabling them to contact the child and family within 72 hours. Additional guidance text within the grounds box has also been requested, acting as a prompt for officers to include more detail when completing this section. This should continue to strengthen constabulary compliance rates.

There were two s60 authorisations during this review period and both for violent disorder/perceived disorder.

- Appleby on 14<sup>th</sup> August 2021 0930hrs until 0030hrs on 15<sup>th</sup> August 2021.
- Barrow on 23<sup>rd</sup> July 2021 for 24hrs from 1800hrs to 1800hrs

# **Cumbria Constabulary Stop Search Data**

## **Period 01<sup>st</sup> April 2021 – 31<sup>st</sup> March 2022**

### **Constabulary Year to Date**

From 1<sup>st</sup> April 2021 until 31<sup>st</sup> March 2022 there have been 2224 searches of people and vehicles which have taken place. This is compared to 3595 which were conducted in the same period in 2020/2021, but similar to the year before of 2019/20 when the figure was 2120.

The majority of the searches have been person searches or persons with a vehicle and there were nil recorded vehicles only searches undertaken.

As previously stated, the number of arrests, which can be seen as a marker of success, has dropped to 383 (17.35%) when compared to the previous year when the data shows 614 (17.1%), but if compared to 2019/20 the figures show a similar 344 (16.2%).

In line with the decreased number of searches, the proportion of positive outcomes has decreased to 635 (28.5%) whereas in 2020/21 it stood at 1002 (27.9%).

- North conducted 827 searches, resulting in 122 arrests (14.75%) and 236 having positive outcomes (28.5%).
- South conducted 589 searches, resulting in 141 arrests (23.94%) and 194 having positive outcomes (32.0%).
- West conducted 706 searches, resulting in 111 arrests (15.72%) and 190 having positive outcomes (26.9%).
- Unknown/blank TPA was 102 searches, with 9 arrests (10.5%), and 15 having positive outcomes (14.7%)

The most common reason for searching was under the Misuse of Drugs Act. 2744 stop and searches were conducted using this power across the constabulary with a positive outcome rate of 27%.

The below data evidences the stop searches increases across all three TPAs and the constabulary as a whole.

**Constabulary search and arrest rate 2021/22**



Dates Covered

01/04/2021

31/03/2022

TPAName

North

- North
- South
- West
- Unknown
- (Blank)

All

Gender

All

AgeBand

All

EthnicAppearance

All

Search comparison

TPA	Searches	Same Period Last Year	Difference	% Change	Previous 3Yr Average	Difference	% Change
North	827	1220	-393	-32.2%	752	75	10.0%
<b>Total</b>	<b>827</b>	<b>1220</b>	<b>-393</b>	<b>-32.2%</b>	<b>752</b>	<b>75</b>	<b>10.0%</b>

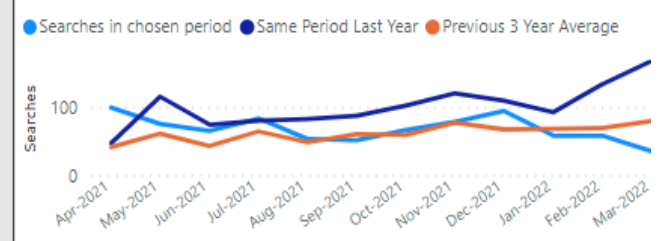
Positive Outcome Searches

TPA	Positive Searches	% of all searches	Same Period Last Year	% of all searches same period last year	% Difference Positive Outcome Rate
North	236	28.5%	328	26.9%	1.7%
<b>Total</b>	<b>236</b>	<b>28.5%</b>	<b>328</b>	<b>26.9%</b>	<b>1.7%</b>

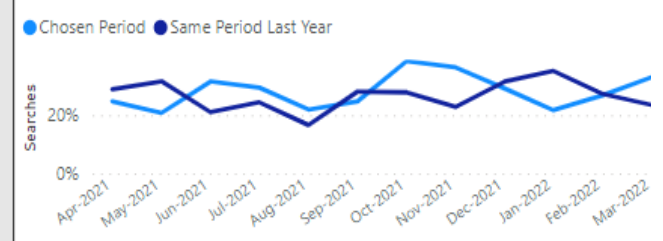
Searches by Outcome

Outcome	Searches	% of Total	Same Period Last Year	% of Total Same Period Last Year	Change
Arrest	122	14.75%	189	15.49%	-0.74%
Caution	5	0.60%	13	1.07%	-0.46%
Community Resolution	24	2.90%	23	1.89%	1.02%
Khat / Cannabis Warning	11	1.33%	58	4.75%	-3.42%
No further action	589	71.22%	881	72.21%	-0.99%
Other action	0	0.00%	0	0.00%	0.00%
Penalty Notice for Disorder	0	0.00%	9	0.74%	-0.74%
Summons	27	3.26%	40	3.28%	-0.01%
Verbal warning / words of advice	49	5.93%	6	0.49%	5.43%
<b>Total</b>	<b>827</b>	<b>100.00%</b>	<b>1220</b>	<b>100.00%</b>	<b>0.00%</b>

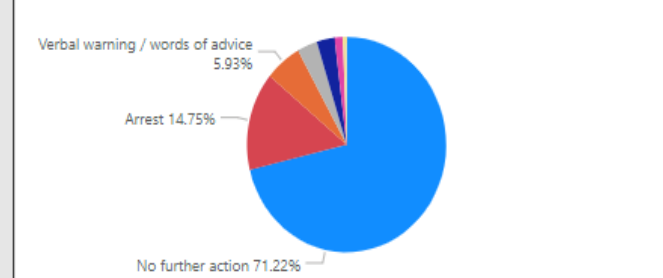
Searches in chosen date range compared to previous period



Positive Outcome % compared to previous periods



Searches by Outcome



Search and arrest data North 2021/2022

# Search and arrest data South 2021/22

Cumbria Constabulary |
Stop and Search Summary

Stop Date  
 01/04/2021 | 31/03/2022

**Dates Covered**  
 01/04/2021  
 31/03/2022

**TPAName**

South ^

North

South

West

Unknown

(Blank)

All v

**Gender**

All v

**AgeBand**

All v

**EthnicAppearance**

All v

**Search comparison**

TPA	Searches	Same Period Last Year	Difference	% Change	Previous 3Yr Average	Difference	% Change
South	589	1081	-492	-45.5%	763	-174	-22.8%
<b>Total</b>	<b>589</b>	<b>1081</b>	<b>-492</b>	<b>-45.5%</b>	<b>763</b>	<b>-174</b>	<b>-22.8%</b>

**Positive Outcome Searches**

TPA	Positive Searches	% of all searches	Same Period Last Year	% of all searches same period last year	% Difference Positive Outcome Rate
South	194	32.9%	300	27.8%	5.2%
<b>Total</b>	<b>194</b>	<b>32.9%</b>	<b>300</b>	<b>27.8%</b>	<b>5.2%</b>

**Searches by Outcome**

Outcome	Searches	% of Total	Same Period Last Year	% of Total Same Period Last Year	Change
Arrest	141	23.94%	183	16.93%	7.01%
Caution	1	0.17%	3	0.28%	-0.11%
Community Resolution	20	3.40%	13	1.20%	2.19%
Khat / Cannabis Warning	6	1.02%	63	5.83%	-4.81%
No further action	379	64.35%	784	72.53%	-8.18%
Other action	0	0.00%	0	0.00%	0.00%
Penalty Notice for Disorder	1	0.17%	9	0.83%	-0.66%
Summons	17	2.89%	22	2.04%	0.85%
Verbal warning / words of advice	24	4.07%	2	0.19%	3.89%
<b>Total</b>	<b>589</b>	<b>100.00%</b>	<b>1081</b>	<b>100.00%</b>	<b>0.00%</b>

**Searches in chosen date range compared to previous periods**

**Positive Outcome % compared to previous periods**

**Searches by Outcome**

# Search and arrest data West 2021/2022

Cumbria Constabulary |
Stop and Search Summary

Stop Date  
 01/04/2021 31/03/2022

**Dates Covered**  
 01/04/2021  
 31/03/2022

**TPAName**

West

- North
- South
- West
- Unknown
- (Blank)

All

**Gender**

All

**AgeBand**

All

**EthnicAppearance**

All

**Search comparison**

TPA	Searches	Same Period Last Year	Difference	% Change	Previous 3Yr Average	Difference	% Change
West	706	1109	-403	-36.3%	935	-229	-24.5%
<b>Total</b>	<b>706</b>	<b>1109</b>	<b>-403</b>	<b>-36.3%</b>	<b>935</b>	<b>-229</b>	<b>-24.5%</b>

**Positive Outcome Searches**

TPA	Positive Searches	% of all searches	Same Period Last Year	% of all searches same period last year	% Difference Positive Outcome Rate
West	190	26.9%	287	25.9%	1.0%
<b>Total</b>	<b>190</b>	<b>26.9%</b>	<b>287</b>	<b>25.9%</b>	<b>1.0%</b>

**Searches by Outcome**

Outcome	Searches	% of Total	Same Period Last Year	% of Total Same Period Last Year	Change
Arrest	111	15.72%	175	15.78%	-0.06%
Caution	6	0.85%	6	0.54%	0.31%
Community Resolution	15	2.12%	10	0.90%	1.22%
Khat / Cannabis Warning	7	0.99%	39	3.52%	-2.53%
No further action	509	72.10%	821	74.03%	-1.93%
Other action	0	0.00%	0	0.00%	0.00%
Penalty Notice for Disorder	0	0.00%	4	0.36%	-0.36%
Summons	45	6.37%	52	4.69%	1.69%
Verbal warning / words of advice	13	1.84%	0	0.00%	1.84%
<b>Total</b>	<b>706</b>	<b>100.00%</b>	<b>1109</b>	<b>100.00%</b>	<b>0.00%</b>

**Searches in chosen date range compared to previous periods**

**Positive Outcome % compared to previous periods**

**Searches by Outcome**

# Search and arrest data Unknown & Blank 2021/22

Cumbria Constabulary
Stop and Search Summary

Stop Date  
 01/04/2021 | 31/03/2022

**Dates Covered**  
 01/04/2021  
 31/03/2022

**TPAName**

Multiple selections ^

- North
- South
- West
- Unknown
- (Blank)

All v

**Gender**

All v

**AgeBand**

All v

**EthnicAppearance**

All v

**Search comparison**

TPA	Searches	Same Period Last Year	Difference	% Change	Previous 3Yr Average	Difference	% Change
Unknown	85	8	77	902.5%	2	83	4150.0%
Total	102	34	68	200.0%	15	87	580.0%

**Positive Outcome Searches**

TPA	Positive Searches	% of all searches	Same Period Last Year	% of all searches same period last year	% Difference Positive Outcome Rate
Unknown	15	17.6%	2	25.0%	-7.4%
Total	15	14.7%	23	67.6%	-52.9%

**Searches by Outcome**

Outcome	Searches	% of Total	Same Period Last Year	% of Total Same Period Last Year	Change
Arrest	9	10.59%	1	3.33%	7.25%
Caution	0	0.00%	0	0.00%	0.00%
Community Resolution	1	1.18%	0	0.00%	1.18%
Khat / Cannabis Warning	1	1.18%	0	0.00%	1.18%
No further action	68	80.00%	5	16.67%	63.33%
Other action	0	0.00%	0	0.00%	0.00%
Penalty Notice for Disorder	1	1.18%	0	0.00%	1.18%
Summons	3	3.53%	0	0.00%	3.53%
Verbal warning / words of advice	2	2.35%	3	10.00%	-7.65%
<b>Total</b>	<b>85</b>	<b>100.00%</b>	<b>30</b>	<b>100.00%</b>	<b>0.00%</b>

**Searches in chosen date range compared to previous periods**

**Positive Outcome % compared to previous periods**

**Searches by Outcome**

## Stop & Search External Scrutiny

Due to the COVID-19 pandemic, it has not been possible for the constabulary to utilise external scrutiny as it has in previous years. However, the constabulary is in the process of re-generating the Independent Advisory Groups (IAGS) and for them to be an additional and independent layer of scrutiny in the area. It is anticipated that future Stop Search Reports will be able to produce the results and advice from IAG meetings.

### **Compliance and Body worn video**

Since the end of June 2020, the Insight and Performance Team (formerly the Business Improvement Unit) have quality assured every stop and search record. This is to ensure officers are undertaking searches as per College of Policing guidance and that the encounters themselves are being correctly recorded.

A dip sample of approximately 20% are further checked for Body Worn Video (BWV) compliance and to see if GOWISELY if correctly used. This data is then fed to the Constabulary Quality Counts department.

The below data displays the dip sampled searches completed with include North, South, and West TPA and specialist departments such as Uniformed Operational Support (Pro-Active Support Group and Mobile Support Group) and the ANPR Team.

The data is broken down and graded as compliant, requires improvement but still compliant and finally non-compliant.

Definitions of the categories are included in the quality counts document which supports consistency of regular review and is defined as follows:

**Compliant** – where an officer has recorded reasonable grounds to state why they are searching the person/vehicle. They have given enough information/detail that any lay person reading the grounds in isolation from any other document (e.g. incident log) would fully understand the reason for search.

**Requires Improvement** – Grounds are lacking in detail or ambiguous wording has been used. Terms such as suspicious or evasive have been used where best practice would be to expand to say what is meant by suspicious, or for example including

what was said between officer and subject rather than just writing that the person was evasive to questions. Where smell of cannabis alone is used in isolation. Best practice is to use alongside other factors.

**Non-compliant** – Officer has not given enough detail to show the reason for the search.

The following data is direct from the Insight and Performance Team and outlines there checks during this reporting period.

**April 2021**

Area	Compliant		Requires Improvement		Total Compliant (compliant & requires improvement)		Non-Compliant		Total Stop Searches	BWV used in all searches	
	No.	%	No.	%	No.	%	No.	%	No.	No.	%
North	60	63%	27	28%	87	92%	8	8%	95	91	96%
South	30	59%	16	31%	46	90%	5	10%	51	46	90%
West	58	69%	23	27%	81	96%	3	4%	84	78	93%
Specialist	15	68%	7	32%	22	100%	0	0%	22	20	91%
Total	163	65%	73	29%	236	94%	16	6%	252	235	93%

	Total Searches	BWV Marked as Used (from Pronto)		BWV Checked		GOWISELY Used		GOWISELY Part Used		No GOWISELY heard		Not Found on Evidence.com	
			%		%		%		%		%		%
North	95	91	96%	19	20%	11	58%	3	16%	2	11%	3	16%
South	51	46	90%	10	20%	6	60%	3	30%	0	0%	1	10%
West	84	78	93%	18	21%	12	67%	4	22%	0	0%	2	11%
Specialist	22	20	91%	5	23%	1	20%	3	60%	1	20%	0	0%
Total	252	235	93%	52	21%	30	58%	13	25%	3	6%	6	12%

**May 2021**

Area	Compliant		Requires Improvement		Total Compliant (compliant & requires improvement)		Non-Compliant		Total Stop Searches	BWV used in all searches	
		%		%		%		%			%
North	34	48%	33	46%	67	94%	4	6%	71	68	96%
South	19	51%	15	41%	34	92%	3	8%	37	27	73%
West	49	55%	37	42%	86	97%	3	3%	89	71	80%
Specialist	21	91%	0	0%	21	91%	2	9%	23	20	87%
Total	123	56%	85	39%	208	95%	12	5%	220	186	85%

	Total Searches	BWV Marked as Used (from Pronto)		BWV Checked		GOWISELY Used		GOWISELY Part Used		No GOWISELY heard		Not Found on Evidence.com	
			%		%		%		%		%		%
North	71	70	99%	14	20%	11	79%	1	7%	1	7%	1	7%
South	37	27	73%	8	22%	4	50%	3	38%	0	0%	1	13%
West	89	71	80%	19	21%	9	47%	5	26%	2	11%	3	16%
Specialist	23	20	87%	3	13%	2	67%	0	0%	1	33%	0	0%
Total	220	188	85%	44	20%	26	59%	9	20%	4	9%	5	11%

**June 2021**



Area	Total Stop Searches		Compliant (Fully)		Compliant but requires improvement		Non-Compliant	
		%		%		%		%
North	62	36%	19	31%	38	61%	5	8%
South	43	25%	8	19%	32	74%	3	7%
West	58	34%	24	42%	28	48%	6	10%
Specialist	9	5%	1	11%	8	89%	0	0%
<b>Force total</b>	<b>172</b>		<b>52</b>	<b>30%</b>	<b>106</b>	<b>62%</b>	<b>14</b>	<b>8%</b>

	Total Search Forms	BWV Marked as 'Used'		BWV Checked		GOWISELY Used		GOWISELY Part Used		No GOWISELY heard		Not Found on Evidence.com	
			% for area		% for area		% of checked		% of checked		% of checked		% of checked
North	62	44	71%	8	14%	1	13%	6	75%	1	13%	0	0%
South	43	34	79%	9	21%	5	56%	4	44%	0	0%	0	0%
West	58	45	78%	9	16%	3	33%	3	33%	1	11%	2	22%
Specialist	9	8	89%	4	50%	1	25%	0	0%	1	25%	2	50%
<b>Total</b>	<b>172</b>	<b>131</b>		<b>30</b>		<b>10</b>		<b>13</b>		<b>3</b>		<b>4</b>	

**JULY 2021**

Criteria	Force total		North		South		West		Specialist	
Total number stop search forms	141	100%	70	100%	13	100%	44	100%	14	100%
Overall compliance (i) + (ii)	123	87%	57	81%	12	92%	41	93%	13	93%
(i) Fully compliant	54	38%	20	29%	6	46%	22	50%	6	43%
(ii) Compliant (requires improvement)	69	49%	37	52%	6	46%	19	43%	7	50%
Non-compliant	18	13%	13	19%	1	8%	3	7%	1	7%
Criteria	Force total		North		South		West		Specialist	
Forms endorsed BWV used	126	89%	64	91%	12	92%	36	82%	14	100%
Forms endorsed BWV not used	15	11%	6	9%	1	8%	8	18%	0	0
Criteria	Force total		North		South		West		Specialist	
Total number searches undertaken	193		87	45%	20	10%	64	33%	22	11%
Monthly QA dip sample of searches for GOWISELY use	60	31%	26	29%	7	35%	19	30%	8	36%
GOWISELY delivered in full	15	25%	7	22%	1	14%	7	37%	0	0
GOWISELY delivered in parts	27	45%	13	42%	4	57%	6	32%	4	50%
GOWISELY not evidenced	9	15%	3	10%	0	0	4	21%	2	25%
NOT PRACTICABLE	2	3%	1	3%	0	0	1	5%	0	0
o BWV file on Evidence.com	7	12%	2	23%	2	29%	1	5%	2	25%

### AUGUST 2021

Criteria	Force total	North	South	West	Specialist
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Total number stop search forms	138	100%	41	30%	31	22%	43	31%	23	17%
Overall compliance (i) + (ii)	125	91%	36	88%	25	81%	43	100%	21	91%
(i) Fully compliant	81	59%	21	51%	16	52%	33	77%	11	48%
(ii) Compliant (requires improvement)	44	32%	15	37%	9	29%	10	23%	10	43%
Non-compliant	13	9%	5	12%	6	19%	0	0%	2	9%
<b>Criteria</b>	<b>Force total</b>		<b>North</b>		<b>South</b>		<b>West</b>		<b>Specialist</b>	
Forms endorsed BWV used	129	93%	38	93%	29	94%	41	95%	21	91%
Forms endorsed BWV not used	9	7%	3	7%	2	6%	2	5%	2	9%
<b>Criteria</b>	<b>Force total</b>		<b>North</b>		<b>South</b>		<b>West</b>		<b>Specialist</b>	
Total number searches undertaken	172		47	27%	37	22%	60	35%	28	16%
Monthly QA dip sample of searches for GOWISELY use	53	31%	14	30%	12	32%	19	32%	8	29%
GOWISELY delivered in full	25	47%	8	57%	0	0%	16	84%	1	13%
GOWISELY delivered in parts	10	19%	4	29%	4	33%	0	0%	2	25%
GOWISELY not evidenced	10	19%	1	7%	6	50%	3	16%	0	0%
NOT PRACTICABLE	0	0%	0	0%	0	0%	0	0%	0	0%
No BWV file on Evidence.com	8	15%	1	7%	2	17%	0	0%	5	63%

## SEPTEMBER 2021

Criteria	Force total	North	South	West	Specialist
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Total number stop search forms	105		38	36%	32	30%	23	22%	12	11%
Overall compliance (i) + (ii)	93	89%	33	87%	26	81%	23	100%	11	92%
(i) Fully compliant	60	57%	18	47%	16	50%	16	70%	10	83%
(ii) Compliant (requires improvement)	33	31%	15	39%	10	31%	7	30%	1	8%
Non-compliant	12	11%	5	13%	6	19%	0	0%	1	8%
<b>Criteria</b>	<b>Force total</b>		<b>North</b>		<b>South</b>		<b>West</b>		<b>Specialist</b>	
Forms endorsed BWV used	100	95%	37	97%	30	94%	22	96%	11	92%
Forms endorsed BWV not used	5	5%	1	3%	2	6%	1	4%	1	8%
<b>Criteria</b>	<b>Force total</b>		<b>North</b>		<b>South</b>		<b>West</b>		<b>Specialist</b>	
Total number searches undertaken	134		49	37%	35	26%	30	22%	20	15%
Monthly QA dip sample of searches for GOWISELY use	51	38%	17	34%	13	37%	11	37%	10	50%
GOWISELY delivered in full	24	47%	9	53%	6	46%	6	55%	3	30%
GOWISELY delivered in parts	5	10%	1	6%	2	15%	0	0%	2	20%
GOWISELY not evidenced	8	16%	4	24%	0	0%	2	18%	2	20%
NOT PRACTICABLE	2	4%	0	0%	1	8%	1	9%	0	0%
No BWV file on Evidence.com	12	24%	3	18%	4	31%	2	18%	3	30%

### October 2021

Criteria	Force total		North		South		West		Specialist	
Total number stop search forms	141		58	41%	28	20%	37	26%	18	13%

Overall compliance (i) + (ii)	91	65%	33	57%	19	68%	30	81%	9	50%		
(i) Fully compliant	30	21%	12	21%	4	14%	13	35%	1	6%		
(ii) Compliant (requires improvement)	61	43%	21	36%	15	54%	17	46%	8	44%		
Non-compliant	50	35%	25	43%	9	32%	7	19%	9	50%		
<b>Criteria</b>			<b>Force total</b>		<b>North</b>		<b>South</b>		<b>West</b>		<b>Specialist</b>	
<b>Forms endorsed BWV used</b>			<b>131</b>	<b>93%</b>	56	<b>97%</b>	22	<b>79%</b>	35	<b>95%</b>	18	<b>100%</b>
<b>Forms endorsed BWV not used</b>			<b>10</b>	<b>7%</b>	2	<b>3%</b>	6	<b>21%</b>	2	<b>5%</b>	0	<b>0%</b>
<b>Criteria</b>	<b>Force total</b>		<b>North</b>		<b>South</b>		<b>West</b>		<b>Specialist</b>			
Total number <b>searches</b> undertaken	<b>199</b>		75	<b>38%</b>	43	<b>22%</b>	54	<b>27%</b>	27	<b>14%</b>		
Monthly QA dip sample of <b>searches</b> for GOWISELY use	<b>46</b>		<b>14</b>		<b>10</b>		<b>12</b>		<b>10</b>			
GOWISELY delivered in full	<b>24</b>	<b>52%</b>	7	<b>50%</b>	4	<b>40%</b>	10	<b>83%</b>	3	<b>30%</b>		
GOWISELY delivered in parts	<b>7</b>	<b>15%</b>	4	<b>29%</b>	2	<b>20%</b>	1	<b>8%</b>	0	<b>0%</b>		
GOWISELY not evidenced	<b>9</b>	<b>20%</b>	1	<b>7%</b>	1	<b>10%</b>	1	<b>8%</b>	6	<b>60%</b>		
NOT PRACTICABLE	<b>1</b>	<b>2%</b>	1	<b>7%</b>	0	<b>0%</b>	0	<b>0%</b>	0	<b>0%</b>		
No BWV file on Evidence.com	<b>5</b>	<b>11%</b>	1	<b>7%</b>	3	<b>30%</b>	0	<b>0%</b>	1	<b>10%</b>		

### November 2021

Criteria	Force total	North	South	West	Specialist				
Total number stop search forms	183	50	27%	32	17%	61	33%	40	22%

Overall compliance (i) + (ii)	126	69%	33	66%	25	78%	38	62%	30	75%
(i) Fully compliant	70	38%	17	34%	10	31%	27	44%	16	40%
(ii) Compliant (requires improvement)	56	31%	16	32%	15	47%	11	18%	14	35%
Non-compliant	57	31%	17	34%	7	22%	23	38%	10	25%
<b>Criteria</b>	<b>Force total</b>		<b>North</b>		<b>South</b>		<b>West</b>		<b>Specialist</b>	
<b>Forms endorsed BWV used</b>	<b>154</b>	<b>84%</b>	48	96%	24	75%	49	80%	33	83%
<b>Forms endorsed BWV not used</b>	<b>29</b>	<b>16%</b>	2	4%	8	25%	12	20%	7	18%
<b>Criteria</b>	<b>Force total</b>		<b>North</b>		<b>South</b>		<b>West</b>		<b>Specialist</b>	
Total number <b>searches</b> undertaken	<b>252</b>		<b>68</b>	<b>27%</b>	<b>34</b>	<b>13%</b>	<b>82</b>	<b>33%</b>	<b>68</b>	<b>27%</b>
Monthly QA dip sample of <b>searches</b> for GOWISELY use	<b>63</b>		<b>20</b>		<b>9</b>		<b>18</b>		<b>16</b>	
GOWISELY delivered in full	<b>38</b>	<b>60%</b>	10	50%	7	78%	16	89%	5	31%
GOWISELY delivered in parts	<b>12</b>	<b>19%</b>	8	40%	0	0%	2	11%	2	13%
GOWISELY not evidenced	<b>5</b>	<b>8%</b>	1	5%	1	11%	0	0%	3	19%
NOT PRACTICABLE	<b>1</b>	<b>2%</b>	1	5%	0	0%	0	0%	0	0%
No BWV file on Evidence.com	<b>7</b>	<b>11%</b>	0	0%	1	11%	0	0%	6	38%

**December 2021**

<b>Criteria</b>	<b>Force total</b>	<b>North</b>	<b>South</b>	<b>West</b>	<b>Specialist</b>
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Total number stop search forms	168		68	40%	29	17%	30	18%	41	24%
Overall compliance (i) + (ii)	132	79%	53	78%	22	76%	29	97%	28	68%
(i) Fully compliant	89	53%	35	51%	18	62%	20	67%	16	39%
(ii) Compliant (requires improvement)	43	26%	18	26%	4	14%	9	30%	12	29%
Non-compliant	36	21%	15	22%	7	24%	1	3%	13	32%
<b>Criteria</b>	<b>Force total</b>		<b>North</b>		<b>South</b>		<b>West</b>		<b>Specialist</b>	
Forms endorsed BWV used	147	88%	61	90%	26	90%	24	80%	36	88%
Forms endorsed BWV not used	21	13%	7	10%	3	10%	6	20%	5	12%
<b>Criteria</b>	<b>Force total</b>		<b>North</b>		<b>South</b>		<b>West</b>		<b>Specialist</b>	
Total number searches undertaken	235		79	34%	44	19%	45	19%	67	29%
Monthly QA dip sample of searches for GOWISELY use	66		21		15		12		18	
GOWISELY delivered in full	43	65%	14	67%	9	60%	11	92%	9	50%
GOWISELY delivered in parts	11	17%	5	24%	3	20%	1	8%	2	11%
GOWISELY not evidenced	1	2%	0	0%	0	0%	0	0%	1	6%
NOT PRACTICABLE	4	6%	1	5%	2	13%	0	0%	1	6%
No BWV file on Evidence.com	8	12%	1	5%	1	7%	1	8%	5	28%

### January 2022

Criteria	Force total	North	South	West	Specialist
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Total number stop search forms	<b>180</b>		<b>48</b>	<b>27%</b>	<b>34</b>	<b>19%</b>	<b>59</b>	<b>33%</b>	<b>39</b>	<b>22%</b>
Overall compliance (i) + (ii)	125	<b>69%</b>	32	<b>67%</b>	22	<b>65%</b>	50	<b>85%</b>	21	<b>54%</b>
(i) Fully compliant	86	<b>48%</b>	22	<b>46%</b>	17	<b>50%</b>	34	<b>58%</b>	13	<b>33%</b>
(ii) Compliant (requires improvement)	39	<b>22%</b>	10	<b>21%</b>	5	<b>15%</b>	16	<b>27%</b>	8	<b>21%</b>
Non-compliant	55	<b>31%</b>	16	<b>33%</b>	12	<b>35%</b>	9	<b>15%</b>	18	<b>46%</b>
<b>Total number searches undertaken</b>										
	<b>256</b>		<b>65</b>	<b>25%</b>	<b>52</b>	<b>20%</b>	<b>77</b>	<b>30%</b>	<b>62</b>	<b>24%</b>
MDA 1971	<b>158</b>	<b>62%</b>	42	<b>65%</b>	30	<b>58%</b>	38	<b>49%</b>	48	<b>77%</b>
PACE 1984	<b>91</b>	<b>36%</b>	23	<b>35%</b>	16	<b>31%</b>	38	<b>49%</b>	14	<b>23%</b>
Other legislation	<b>7</b>	<b>3%</b>	0	<b>0%</b>	6	<b>2%</b>	1	<b>0%</b>	0	<b>0%</b>
<b>Total number positive searches</b>										
	<b>37</b>		<b>10</b>	<b>27%</b>	<b>9</b>	<b>24%</b>	<b>8</b>	<b>22%</b>	<b>10</b>	<b>27%</b>
MDA 1971	32	<b>86%</b>	9	<b>90%</b>	8	<b>89%</b>	5	<b>63%</b>	10	<b>100%</b>
PACE 1984	4	<b>11%</b>	1	<b>10%</b>	1	<b>11%</b>	2	<b>25%</b>	0	<b>0%</b>
Other	1	<b>0</b>	0	<b>0%</b>	0	<b>0%</b>	1	<b>0%</b>	0	<b>0%</b>
<b>Forms endorsed BWV used</b>										
	<b>159</b>	<b>88%</b>	45	<b>94%</b>	33	<b>97%</b>	51	<b>86%</b>	30	<b>77%</b>
<b>Forms endorsed BWV not used</b>										
	<b>21</b>	<b>12%</b>	3	<b>6%</b>	1	<b>3%</b>	8	<b>14%</b>	9	<b>23%</b>
<b>Monthly QA dip sample of searches for GOWISELY use</b>										
	<b>52</b>		<b>13</b>		<b>14</b>		<b>15</b>		<b>10</b>	



GOWISELY delivered in full	<b>29</b>	56%	8	62%	9	64%	10	67%	2	20%
GOWISELY delivered in parts	<b>9</b>	17%	1	8%	5	36%	1	7%	2	20%
GOWISELY not evidenced	<b>6</b>	12%	0	0%	0	0%	0	0%	6	60%
NOT PRACTICABLE	<b>0</b>	0%	0	0%	0	0%	0	0%	0	0%
No BWV file on Evidence.com	<b>8</b>	15%	4	31%	0	0%	4	27%	0	0%

**February 2022**

Criteria	Force total	North	South	West	Specialist
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Total number stop search forms	165		50	30%	46	28%	44	27%	25	15%
Overall compliance (i) + (ii)	118	72%	28	56%	35	76%	41	93%	14	56%
(i) Fully compliant	71	43%	19	38%	25	54%	24	55%	3	12%
(ii) Compliant (requires improvement)	47	28%	9	18%	10	22%	17	39%	11	44%
Non-compliant	47	28%	22	44%	11	24%	3	7%	11	44%
Total number searches undertaken	248		62	25%	73	29%	58	23%	55	22%
MDA 1971	174	70%	42	68%	43	59%	50	86%	39	71%
PACE 1984	63	25%	20	32%	21	29%	8	14%	14	25%
Other legislation	9	4%	0	0%	6	2%	0	0%	0	0%
Total number positive searches	41		13	32%	12	29%	14	34%	2	5%
MDA 1971	36	88%	12	92%	9	75%	14	100%	1	50%
PACE 1984	2	5%	1	8%	0	0%	0	0%	1	50%
Other	2	0	0	0%	2	0%	0	0%	0	0%

<b>Forms endorsed BWV used</b>	<b>150</b>	<b>91%</b>	<b>49</b>	<b>98%</b>	<b>43</b>	<b>93%</b>	<b>41</b>	<b>93%</b>	<b>17</b>	<b>68%</b>
<b>Forms endorsed BWV not used</b>	<b>15</b>	<b>9%</b>	<b>1</b>	<b>2%</b>	<b>3</b>	<b>7%</b>	<b>3</b>	<b>7%</b>	<b>8</b>	<b>32%</b>
<b>Monthly QA dip sample of searches for GOWISELY use</b>										
	<b>52</b>		<b>12</b>		<b>14</b>		<b>13</b>		<b>13</b>	
GOWISELY delivered in full	<b>33</b>	<b>63%</b>	<b>7</b>	<b>58%</b>	<b>8</b>	<b>57%</b>	<b>11</b>	<b>85%</b>	<b>7</b>	<b>54%</b>
GOWISELY delivered in parts	<b>6</b>	<b>12%</b>	<b>2</b>	<b>17%</b>	<b>2</b>	<b>14%</b>	<b>2</b>	<b>15%</b>	<b>0</b>	<b>0%</b>
GOWISELY not evidenced	<b>7</b>	<b>13%</b>	<b>1</b>	<b>8%</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>	<b>6</b>	<b>46%</b>
NOT PRACTICABLE	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>
No BWV file on Evidence.com	<b>6</b>	<b>12%</b>	<b>2</b>	<b>17%</b>	<b>4</b>	<b>29%</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>

**March 2022**

<b>Criteria</b>	<b>Force total</b>	<b>North</b>	<b>South</b>	<b>West</b>	<b>Specialist</b>
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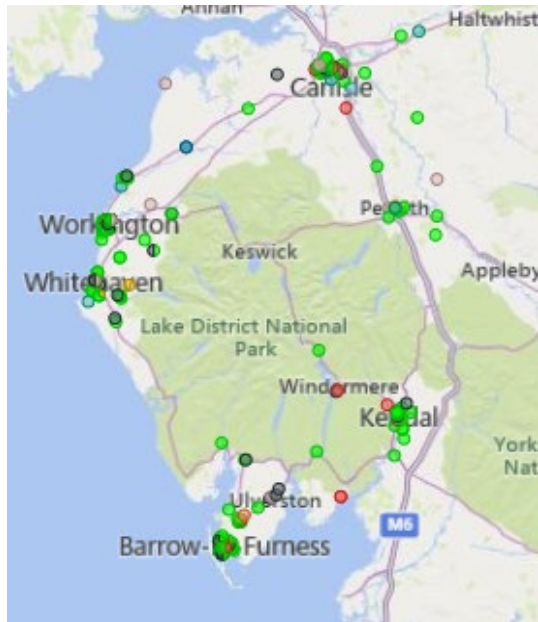
Total number stop search forms	135		24	18%	35	26%	49	36%	27	20%
Overall compliance (i) + (ii)	88	65%	15	63%	20	57%	34	69%	19	70%
(i) Fully compliant	54	40%	9	38%	12	34%	20	41%	13	48%
(ii) Compliant (requires improvement)	34	25%	6	25%	8	23%	14	29%	6	22%
Non-compliant	47	35%	9	38%	15	43%	15	31%	8	30%
Total number searches undertaken	192		35	18%	38	20%	65	34%	54	28%
MDA Possession	79	41%	13	37%	16	42%	31	48%	19	35%
MDA Supply	75	39%	6	17%	11	29%	24	37%	34	63%
PACE	35	18%	13	37%	11	29%	10	15%	1	2%
Other legislation	3	2%	3	2%	0	0%	0	0%	0	0%
Total number positive searches	46		8	17%	14	30%	15	33%	9	20%
MDA Possession	26	57%	4	50%	4	29%	9	60%	9	100%
MDA Supply	12	26%	0	0%	7	50%	5	33%	0	0%
PACE	8	17%	4	50%	3	21%	1	7%	0	0%

Other	0	0	0	0%	0	0%	0	0%	0	0%
<b>Forms endorsed BWV used</b>	<b>123</b>	<b>91%</b>	<b>23</b>	<b>96%</b>	<b>32</b>	<b>91%</b>	<b>46</b>	<b>94%</b>	<b>22</b>	<b>81%</b>
<b>Forms endorsed BWV not used</b>	<b>12</b>	<b>9%</b>	<b>1</b>	<b>4%</b>	<b>3</b>	<b>9%</b>	<b>3</b>	<b>6%</b>	<b>5</b>	<b>19%</b>
Monthly QA dip sample of searches for GOWISELY use	<b>57</b>		<b>11</b>		<b>13</b>		<b>19</b>		<b>14</b>	
GOWISELY delivered in full	<b>28</b>	<b>49%</b>	<b>9</b>	<b>82%</b>	<b>2</b>	<b>15%</b>	<b>16</b>	<b>84%</b>	<b>1</b>	<b>7%</b>
GOWISELY delivered in parts	<b>9</b>	<b>16%</b>	<b>0</b>	<b>0%</b>	<b>5</b>	<b>38%</b>	<b>0</b>	<b>0%</b>	<b>4</b>	<b>29%</b>
GOWISELY not evidenced	<b>7</b>	<b>12%</b>	<b>0</b>	<b>0%</b>	<b>1</b>	<b>8%</b>	<b>3</b>	<b>16%</b>	<b>3</b>	<b>21%</b>
NOT PRACTICABLE	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>
No BWV file on Evidence.com	<b>13</b>	<b>23%</b>	<b>2</b>	<b>18%</b>	<b>5</b>	<b>38%</b>	<b>0</b>	<b>0%</b>	<b>6</b>	<b>43%</b>

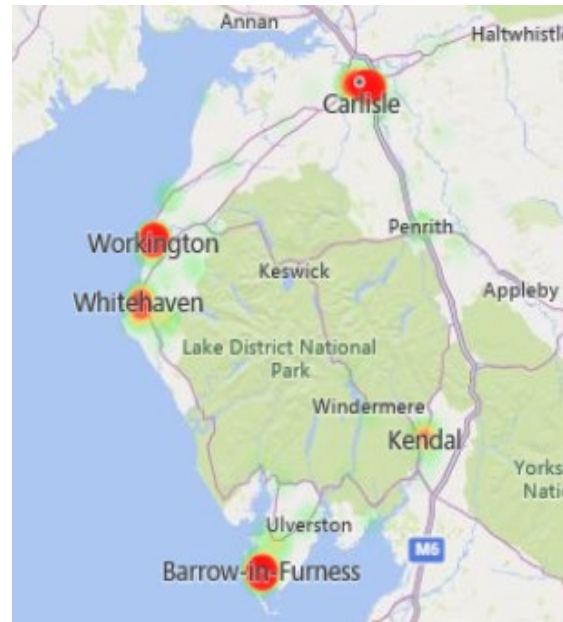
## Power BI Tool

The Power BI stop and search tool shows locations of recorded searches and a heat map in which it is clear that the majority of stop and searches are conducted in the largest towns and the city of Carlisle within the constabulary geographical area.

### Example of All Stop Search Locations



### Example of All Heat Map of Majority of Stop Searches



This information allows for further governance of stop search locations and identify any patterns or areas of concern.

### Repeat searches

Over the twelve-month period 2021/2022, 271 individuals have been stopped and searched more than once. The most a person was searched during this full twelve-month period was 10 times. No significant trends have been identified or raised and scrutiny shows that these individuals are not repeatedly searched due to their location or protected

characteristic, but due to the grounds presented and their criminal activity. No adverse complaints have been received from these individuals that have been stopped and searched at the above times with appropriate grounds due to their criminality.

The person searched 10 times was a North nominal and searched on different occasions by 8 differing officers over the period and is a white 17 year old male.

### **Searches by officer**

The most searches conducted by an individual officer in 2021/2022 FYTD was 63, which were conducted by a constable in the West Pro-Active Team. The next top number of searches was conducted by a North Pro-Active officer with 44 and then a constable on the Road Crime Unit who conducted 39.

It is expected to see a disproportionate number of searches conducted by Pro-Active Team and Road Crime Unit officers where stop and search is used as a valid tactic in the prevention and detection of crime. All searches are checked and scrutinised by supervision for legitimacy, procedural accuracy, quality of the search and the submission and completion of correct forms. This ensures data such as powers used, ethnicity, and outcomes are recorded accurately.

# Constabulary Ethnicity, Gender, and Age Data

## **Constabulary Ethnicity Data**

The below ethnicity data shows the figures relating to self -defined ethnicity. It shows an increase in the number of stop & searches of members of the minority ethnic communities FYTD. The expanded numbers remain commensurate with general increased usage of the power across constabulary demographics. Similarly to all stop search data, the majority of searches were under the Misuse of Drugs Act.



The Red Sigma data currently records ethnicity and uses the term BAME (Black, Asian, and Minority Ethnic). The term BAME defines as all ethnic groups except White ethnic groups. It does not relate to the country of origin or affiliation. The Commission on Race and Ethnic Disparities and Disproportionality Working Group has recommended to stop using this term. In line with this, the Red Sigma Project has been approached and asked for such terminology to be changed, so any future generated reports will use more contemporary and inclusive language.<sup>3</sup> The recent HMICFRS Report *Disproportionate use of police powers: A spotlight on stop and search and the use of force*, highlights the use of the term ‘Black, Asian, and Minority Ethnic.’ This has received differing views, but HMICFRS will continue to use it as it is presently a widely accepted and recognised term and so this report will use the same terminology.<sup>4</sup>

This more informed Ethnicity Data will then be monitored on a quarterly basis through this report at Operations Board.

### **ALL CONSTABULARY ethnicity searches data: 2020/2021**

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<sup>3</sup> Please see current UK Government recommended guidance. Available at: <https://www.ethnicity-facts-figures.service.gov.uk/style-guide/writing-about-ethnicity> (Accessed 16/08/2022)

<sup>4</sup> Please see HMICFRS Report. Available at: <https://www.justiceinspectorates.gov.uk/hmicfrs/publications/disproportionate-use-of-police-powers-a-spotlight-on-stop-and-search-and-the-use-of-force/> (Accessed 16/08/2022)

EthnicAppearance	Searches	% of Total	ArrestCount	% Searches with Arrest	Positive Count	% Searches with Positive Outcome	Positive & Related	% with positive & related	Stops
Asian	58	2.61%	16	27.6%	26	44.8%	22	37.9%	49
Black	44	1.98%	11	25.0%	13	29.5%	9	20.5%	37
Other	9	0.40%	2	22.2%	2	22.2%	2	22.2%	9
Unknown	69	3.10%	9	13.0%	19	27.5%	17	24.6%	68
White	2044	91.91%	345	16.9%	575	28.1%	492	24.1%	1675
<b>Total</b>	<b>2224</b>	<b>100.00%</b>	<b>383</b>	<b>17.2%</b>	<b>635</b>	<b>28.6%</b>	<b>542</b>	<b>24.4%</b>	<b>1817</b>

During the previous year of 2020/21, due to issues with the PRONTO ICT system and the initial Red Sigma introduction, there were 391 records which had *not stated* for ethnicity. Due to continued work and improvements, this year's report shows only 69 classed as *unknown (not stated)*.

This allows for a more comprehensive and accurate view of ethnicity data and how stop and search legislation is utilised by the constabulary.

The above data evidences that 91.91% of all people stopped and search by Cumbria Constabulary were of white ethnicity.

**The following pages display ethnicity by TPA:**

**NORTH TPA**

EthnicAppearance	Searches	% of Total	ArrestCount	% Searches with Arrest	Positive Count	% Searches with Positive Outcome	Positive & Related	% with positive & related	Stops	
+	Asian	33	3.99%	9	27.3%	16	48.5%	14	42.4%	26
+	Black	16	1.93%	6	37.5%	7	43.8%	5	31.3%	11
+	Other	8	0.97%	2	25.0%	2	25.0%	2	25.0%	8
+	Unknown	18	2.18%	3	16.7%	6	33.3%	5	27.8%	18
+	White	752	90.93%	102	13.6%	205	27.3%	180	23.9%	634
	<b>Total</b>	<b>827</b>	<b>100.00%</b>	<b>122</b>	<b>14.8%</b>	<b>236</b>	<b>28.5%</b>	<b>206</b>	<b>24.9%</b>	<b>690</b>

### SOUTH TPA

EthnicAppearance	Searches	% of Total	ArrestCount	% Searches with Arrest	Positive Count	% Searches with Positive Outcome	Positive & Related	% with positive & related	Stops	
+	Asian	15	2.55%	3	20.0%	4	26.7%	4	26.7%	13
+	Black	17	2.89%	5	29.4%	5	29.4%	3	17.6%	17
+	Other	0	0.00%		0.0%		0.0%		0.0%	0
+	Unknown	14	2.38%	3	21.4%	6	42.9%	5	35.7%	13
+	White	543	92.19%	130	23.9%	179	33.0%	154	28.4%	434
	<b>Total</b>	<b>589</b>	<b>100.00%</b>	<b>141</b>	<b>23.9%</b>	<b>194</b>	<b>32.9%</b>	<b>166</b>	<b>28.2%</b>	<b>468</b>

### WEST TPA

EthnicAppearance	Searches	% of Total	ArrestCount	% Searches with Arrest	Positive Count	% Searches with Positive Outcome	Positive & Related	% with positive & related	Stops	
+	Asian	7	0.99%	3	42.9%	5	71.4%	4	57.1%	7
+	Black	8	1.13%		0.0%	1	12.5%	1	12.5%	6
+	Other	0	0.00%		0.0%		0.0%		0.0%	0
+	Unknown	16	2.27%	3	18.8%	7	43.8%	7	43.8%	16
+	White	675	95.61%	105	15.6%	177	26.2%	146	21.6%	555
	<b>Total</b>	<b>706</b>	<b>100.00%</b>	<b>111</b>	<b>15.7%</b>	<b>190</b>	<b>26.9%</b>	<b>158</b>	<b>22.4%</b>	<b>581</b>

### UNKNOWN/BLANK TPA

EthnicAppearance	Searches	% of Total	ArrestCount	% Searches with Arrest	Positive Count	% Searches with Positive Outcome	Positive & Related	% with positive & related	Stops
Asian	3	2.94%	1	33.3%	1	33.3%		0.0%	3
Black	3	2.94%		0.0%		0.0%		0.0%	3
Other	1	0.98%		0.0%		0.0%		0.0%	1
Unknown	21	20.59%		0.0%		0.0%		0.0%	21
White	74	72.55%	8	10.8%	14	18.9%	12	16.2%	52
<b>Total</b>	<b>102</b>	<b>100.00%</b>	<b>9</b>	<b>8.8%</b>	<b>15</b>	<b>14.7%</b>	<b>12</b>	<b>11.8%</b>	<b>78</b>

### Constabulary Gender Data:

Due to upgrades and changes in the Red Sigma and Power BI systems, it is now possible to obtain data on gender with regards to the stop and searches.

### **ALL Constabulary Gender data 2021/22:**

Gender	Searches	% of Total	% Searches with Arrest	Positive Count	% Searches with Positive Outcome	Positive & Related	% with positive & related
Female / Transgender Female	293	13.17%	14.0%	83	28.3%	75	25.6%
Male / Transgender Male	1889	84.94%	18.1%	551	29.2%	466	24.7%
Not Specified	0	0.00%	0.0%		0.0%		0.0%
Unknown	42	1.89%	2.4%	1	2.4%	1	2.4%
<b>Total</b>	<b>2224</b>	<b>100.00%</b>	<b>17.2%</b>	<b>635</b>	<b>28.6%</b>	<b>542</b>	<b>24.4%</b>

The above table outlines the numbers and percentages of genders of those stopped and searched by Cumbria Constabulary.

84.94% were recorded as Male/Transgender male, with 13.17% as Female/Transgender female.

**The following pages display gender by TPA:**

**NORTH TPA:**

Gender	Searches	% of Total	% Searches with Arrest	Positive Count	% Searches with Positive Outcome	Positive & Related	% with positive & related
Female / Transgender Female	89	10.76%	10.1%	26	29.2%	24	27.0%
Male / Transgender Male	723	87.42%	15.5%	209	28.9%	181	25.0%
Unknown	15	1.81%	6.7%	1	6.7%	1	6.7%
<b>Total</b>	<b>827</b>	<b>100.00%</b>	<b>14.8%</b>	<b>236</b>	<b>28.5%</b>	<b>206</b>	<b>24.9%</b>

**SOUTH TPA:**

Gender	Searches	% of Total	% Searches with Arrest	Positive Count	% Searches with Positive Outcome	Positive & Related	% with positive & related
Female / Transgender Female	85	14.43%	23.5%	28	32.9%	24	28.2%
Male / Transgender Male	501	85.06%	24.2%	166	33.1%	142	28.3%
Not Specified	0	0.00%	0.0%		0.0%		0.0%
Unknown	3	0.51%	0.0%		0.0%		0.0%
<b>Total</b>	<b>589</b>	<b>100.00%</b>	<b>23.9%</b>	<b>194</b>	<b>32.9%</b>	<b>166</b>	<b>28.2%</b>

**WEST TPA:**

Gender	Searches	% of Total	% Searches with Arrest	Positive Count	% Searches with Positive Outcome	Positive & Related	% with positive & related
Female / Transgender Female	117	16.57%	10.3%	29	24.8%	27	23.1%
Male / Transgender Male	583	82.58%	17.0%	161	27.6%	131	22.5%
Unknown	6	0.85%	0.0%		0.0%		0.0%
<b>Total</b>	<b>706</b>	<b>100.00%</b>	<b>15.7%</b>	<b>190</b>	<b>26.9%</b>	<b>158</b>	<b>22.4%</b>

**UNKNOWN/BLANK TPA:**

Gender	Searches	% of Total	% Searches with Arrest	Positive Count	% Searches with Positive Outcome	Positive & Related	% with positive & related
Female / Transgender Female	2	1.96%	0.0%		0.0%		0.0%
Male / Transgender Male	82	80.39%	11.0%	15	18.3%	12	14.6%
Unknown	18	17.65%	0.0%		0.0%		0.0%
<b>Total</b>	<b>102</b>	<b>100.00%</b>	<b>8.8%</b>	<b>15</b>	<b>14.7%</b>	<b>12</b>	<b>11.8%</b>

**Children (under 18 years of age)**

During 2021/22 there were 484 children (a person aged under 18 years) stopped and searched. This is 21.76% of all persons stopped and searched. Over the age of 18 was a total of 1712 and 28 were recorded as unknown.

AgeBand	Searches	% of Total	Arrest Count	% Searches with Arrest	Positive Count	% Searches with Positive Outcome	Positive & Related	% with positive & related
Unknown	28	1.26%	1	3.6%	1	3.6%	1	3.6%
Under 18	484	21.76%	35	7.2%	114	23.6%	99	20.5%
18 or Over	1712	76.98%	347	20.3%	520	30.4%	442	25.8%
<b>Total</b>	<b>2224</b>	<b>100.00%</b>	<b>383</b>	<b>17.2%</b>	<b>635</b>	<b>28.6%</b>	<b>542</b>	<b>24.4%</b>

This is an increase from 2020/21 when it was reported that 457 children were stopped and searched.

The Red Sigma stop and search module is ongoing and this automatically notifies the Child Centred Policing Teams of an under 18 search. The Team then reviews the information and contact the child and family to ensure there are no underlying vulnerabilities or support required. This approach will also allow for any concerns to be allayed regarding the search. The Child Centred Policing Teams are now established and operational in each of the TPA's and have responsibility for monitoring the stop and search of children. When a child is stop and searched the officer must consider the circumstances in which they have been located. They must consider any vulnerabilities and the safety of the child. If the child is deemed at risk in any way, then they should be returned home where possible.

With continuing scrutiny by the Independent Advisory Groups, the Child Centred Policing Team, and the TPA Performance Inspectors as well as the more routine checks and balances conducted by officers direct supervision, it is envisaged that any issues or concerns regarding the stop and search of children by Cumbria Constabulary officers will be highlighted and

justified accordingly, and, more importantly, that the child and their guardians will be contacted and offered support if applicable or necessitated.

The below data from Red Sigma and the Power BI outlines all the given ages of all those stop and searched. In every category those aged under 18 years of age are in the minority compared with adults.

**NORTH TPA:**

AgeBand	Searches	% of Total	Arrest Count	% Searches with Arrest	Positive Count	% Searches with Positive Outcome	Positive & Related	% with positive & related
Unknown	1	0.12%		0.0%		0.0%		0.0%
Under 18	172	20.80%	8	4.7%	41	23.8%	34	19.8%
18 or Over	654	79.08%	114	17.4%	195	29.8%	172	26.3%
<b>Total</b>	<b>827</b>	<b>100.00%</b>	<b>122</b>	<b>14.8%</b>	<b>236</b>	<b>28.5%</b>	<b>206</b>	<b>24.9%</b>

**SOUTH TPA:**



AgeBand	Searches	% of Total	Arrest Count	% Searches with Arrest	Positive Count	% Searches with Positive Outcome	Positive & Related	% with positive & related
Unknown	6	1.02%		0.0%		0.0%		0.0%
Under 18	140	23.77%	21	15.0%	36	25.7%	34	24.3%
18 or Over	443	75.21%	120	27.1%	158	35.7%	132	29.8%
<b>Total</b>	<b>589</b>	<b>100.00%</b>	<b>141</b>	<b>23.9%</b>	<b>194</b>	<b>32.9%</b>	<b>166</b>	<b>28.2%</b>

**WEST TPA:**

AgeBand	Searches	% of Total	Arrest Count	% Searches with Arrest	Positive Count	% Searches with Positive Outcome	Positive & Related	% with positive & related
Unknown	4	0.57%	1	25.0%	1	25.0%	1	25.0%
Under 18	139	19.69%	6	4.3%	32	23.0%	26	18.7%
18 or Over	563	79.75%	104	18.5%	157	27.9%	131	23.3%
<b>Total</b>	<b>706</b>	<b>100.00%</b>	<b>111</b>	<b>15.7%</b>	<b>190</b>	<b>26.9%</b>	<b>158</b>	<b>22.4%</b>

**UNKNOWN/BLANK TPA:**

AgeBand	Searches	% of Total	Arrest Count	% Searches with Arrest	Positive Count	% Searches with Positive Outcome	Positive & Related	% with positive & related
Unknown	17	16.67%		0.0%		0.0%		0.0%
Under 18	33	32.35%		0.0%	5	15.2%	5	15.2%
18 or Over	52	50.98%	9	17.3%	10	19.2%	7	13.5%
<b>Total</b>	<b>102</b>	<b>100.00%</b>	<b>9</b>	<b>8.8%</b>	<b>15</b>	<b>14.7%</b>	<b>12</b>	<b>11.8%</b>

**Conclusion:**

This Annual Report covers from 01<sup>st</sup> April 2021 until 31<sup>st</sup> March 2022. Whilst emerging from the COVID-19 pandemic and associated restrictions, the data shows a marked decrease in stop searches throughout the county but still keeping a high percentage of positive outcomes (arrest, penalty notices, reporting for summons etc). This report also evidences how Cumbria Constabulary use of stop search legislation is proportionate within ethnicities and ages and favourable in comparison with other police and constabularies throughout England and Wales.

The Red Sigma process has now been fully implemented across the constabulary and replaced the previous Pronto system. This allows officers to be able to complete and submit stop search reports promptly and effectively either at a desk top computer or on their hand-held devices. The technology also allows for Line Managers, Performance Inspectors and Senior Management Teams to access data which includes location mapping as well as the legislation and Home Office required information. This immediate submission of data will allow other departments immediate access so that officers such as the Child Centred Policing Team have access and information of all under 18s who are subject of a search and allow them to intervene and support both the subjects and their families accordingly.

In light of continuing reported incidents of inequality throughout the world, Cumbria Constabulary aims to be at the forefront of ensuring the people and communities it serves are treated in a professional and non-discriminatory way. The data provided, along with the BWV audits, allows the constabulary to sight, review, and process alongside its dedication to work with partners such as the Independent Advisory Groups, Anti-Racist Cumbria, and other diversity organisations to ensure the high standards expected by both the constabulary and public are adhered to by officers.

The data shows that the average person who is stopped and searched by Cumbria Constabulary is a white male, over 18 years old, and the legislation is under the Misuse of Drugs Act.

The Red Sigma platform with drop down boxes for officer comments has helped massively reduce the numbers of *not stated/unknown/blank* when identifying ethnicity and genders and give the constabulary a more accurate picture of those

who we engage with whilst utilising this legislation. Future quarterly and annual reports will continue to utilise Red Sigma and the Power BI for data and information for the submission of these reports.

A/Insp 1878 Gaynor Taylor

Criminal Justice Unit

# Ethics and Integrity Panel



## Cumbria Constabulary Freedom of Information & Data Protection Compliance

**Date:** 19<sup>th</sup> August 2022

**Agenda Item No:** 11

**Originating Officer:** Jo Edgar and Lesley Johnson

### **Executive Summary:**

As a public authority, Cumbria Constabulary is required to 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 2020, 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.

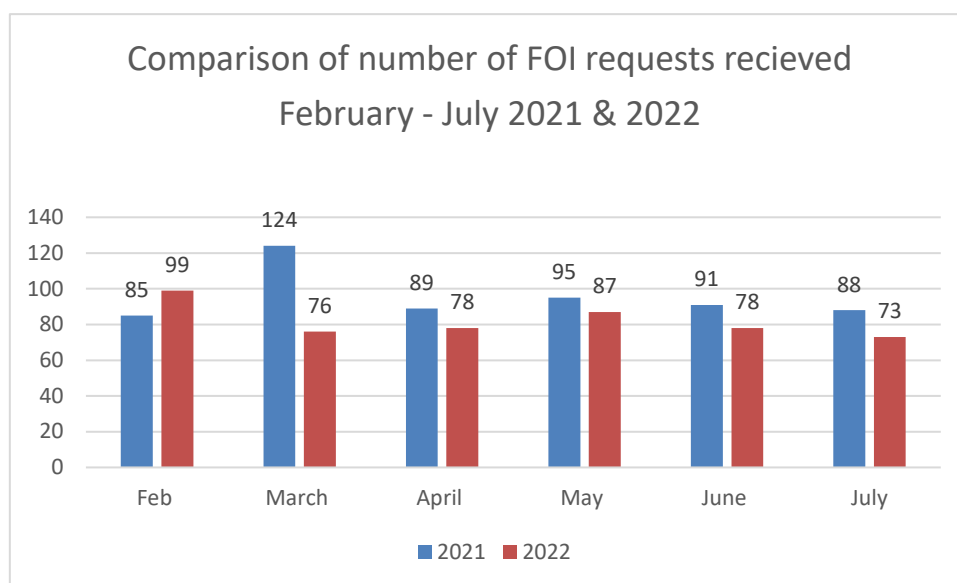
1.4 The Information Management Team, which forms part of the Digital, Data, and Technology Command, is responsible for receiving, recording, collating internal responses and responding to freedom of information requests and subject access requests, received by the Constabulary.

## 2. Issues for Consideration

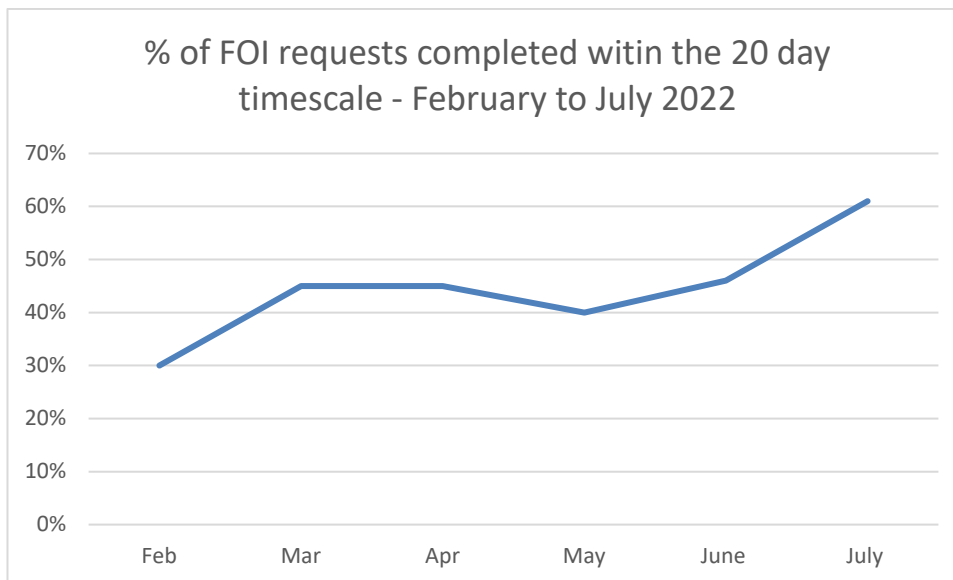
### 2.1 Freedom of Information Requests

2.1.1 In the six-month period between February 2022 and July 2022, 491 freedom of information requests were received, a reduction of 81 compared to the same period last year.

2.1.2 The chart below shows the number of FOI requests received by month for the same period for years 2021 and 2022.



2.1.3 Compliance to the 20-day timescale has fluctuated over the six-month period. This level of performance was anticipated due to the abstractions required to train new team members following the Information Management programme of change. Performance is starting to improve as individuals become more confident and the amount of quality checking is starting to reduce. The chart below indicates that compliance is steadily improving.

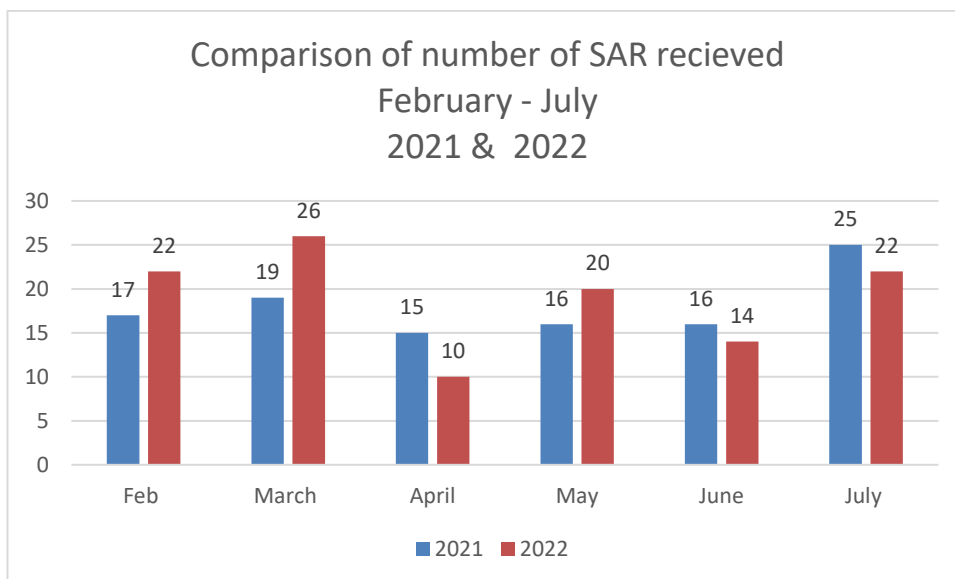


2.1.4 The mean compliance rate for all police forces in England and Wales, for May 2022 (the most recent month for which national statistics available), was 74% of requests closed within 20 working days. The compliance for Cumbria Constabulary for the month of May was 40% rising to 61% in July.

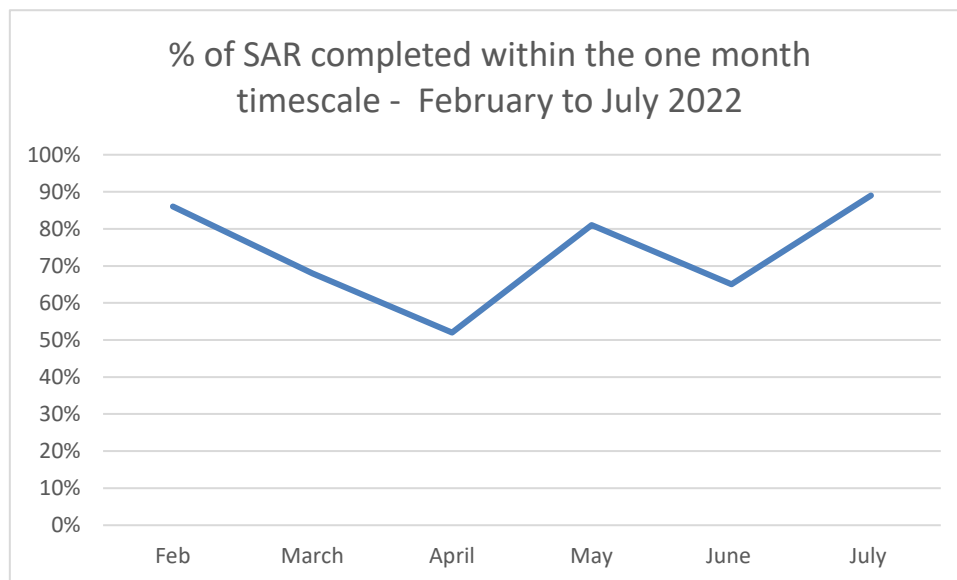
## 2.2 Subject Access Requests

2.2.1 In the six-month period between February 2022 and July 2022, 114 subject access requests were received, an increase of 6 compared to the same period last year.

2.2.2 The chart below shows the number of SAR requests received by month, for the same period for years 2021 and 2022.



2.2.3 Compliance to the one-month timescale has fluctuated over the six-month period. This level of performance was anticipated due to the abstractions required to train new team members following the information management change programme. Performance is starting to improve as individuals become more confident and the amount of quality checking is starting to reduce. The chart below indicates that compliance is steadily improving.



2.2.4 The mean compliance rate for all police forces in England and Wales, for May 2022, was 62% of requests closed within the statutory period. The compliance for Cumbria Constabulary for the month of May was 81% with a dip in June to 65%, increasing to 89% in July.

2.2.5 The Constabulary continues to receive a number of requests from its own officers and staff. Whilst the numbers of these requests remain relatively low, the time required to process these requests is disproportionately high as requests of this nature tend to be the more time consuming and complex when compared with requests received from members of the public. Requests for access to visual and/or audio recordings such as body worn video footage also take a disproportionately large amount of time to process.

### **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 over 4 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. The Bill is scheduled to have its second reading in the House of Commons on Monday 5<sup>th</sup> September. The National Policing Data Board are drafting a summary of the Bill and what proposed changes means for policing which will be available as soon as is practicable.

3.2 Accessibility

3.2.1 Work is being undertaken to improve access to services, in particular the website and publication scheme.

**4. Implications**

4.1 It is recognised that the Constabulary has not consistently responded to information requests within statutory timescales and therefore there is a risk of enforcement action by the Information Commissioner.



# Ethics and Integrity Panel



## Title: OPCC INFORMATION MANAGEMENT COMPLIANCE

**Date:** 15 August 2022

**Agenda Item No:** 12

**Originating Officer:** Joanne Head, OPCC Governance Manager

**CC:**

### **Executive Summary:**

As a public authority, the Office of the Police and Crime Commissioner is required to process information in an appropriate manner including complying with the Freedom of Information Act 2000 and the Data Protection Act 2018. Both Acts entitle an individual to request information from a public authority and as such public authorities must comply with requests under this legislation. The Acts clearly identify how a request should be processed including timescales in which an individual should be provided with the requested information or advised why an exemption is being applied.

### **Recommendation:**

That, the members of the Panel note the report.

### **1. Introduction & Background**

- 1.1 This report is to provide information to the Panel, acting on behalf of the Commissioner, so the Panel can assure the Commissioner that the OPCC are complying with the Freedom of Information Act and the Data Protection Act.
- 1.2 The Chief Constable and the Police & Crime Commissioner (the Commissioner) are required to comply with the Freedom of Information (FOI) Act, the Environmental Information Regulations where applicable and the Data Protection Act. Set out within the legislation is how a request is to be processed and within what timescales.
- 1.3 On an annual basis the Commissioner agrees a "Funding Arrangement" with the Chief Constable. This arrangement sets out the terms and conditions under which the Commissioner will provide funding to the Chief Constable during the Funding Period. Detailed within Section 17 of the Funding Arrangement the Chief Constable will comply with their obligations detailed within the Data Protection Act 2018 and the General Data Protection Regulations (GDPR) effective from 25 May 2018. Where appropriate the Chief

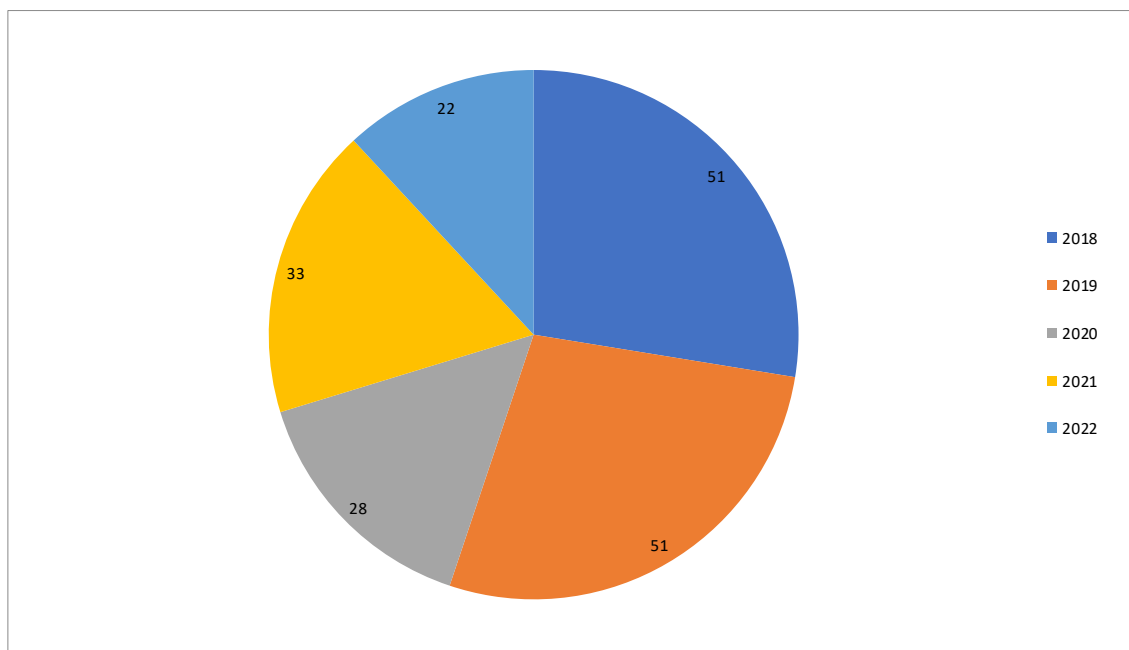
Constable must notify individuals that their personal data may be transferred to the Commissioner as required under the funding arrangement. They should ensure this is carried out via a secure means of transmission.

- 1.4 The Chief Constable agrees to assist and cooperate with the Commissioner, where necessary, to enable the Commissioner to comply with their obligations under the FOI Act and the Environmental Information Regulations whenever a request is made for information.
- 1.5 In the event that a request received by the Chief Constable under the FOI Act or the Environmental Information Regulations includes a request for information, either (i) provided to the Chief Constable by the Commissioner, or (ii) where a reasonably objective observer would consider that disclosure of that information would be likely to have a prejudicial impact on the Commissioner's priorities and responsibilities, the Chief Constable shall in good faith take account of any representations submitted by the Commissioner about the applicability of any exemptions under the FOI Act or exceptions under the Environmental Information Regulations.

**2. Issues for Consideration**

Freedom of Information Act

- 2.1 In order to have assurance that the OPCC and the Constabulary are complying with the Freedom of Information Act, the Police and Crime Commissioner has delegated authority to the Ethics and Integrity Panel to monitor this areas of business. This report is to provide assurance to the Panel that the OPCC are complying with the Freedom of Information Act.
- 2.2 The chart below shows the number of FOI requests that the OPCC has received from over the past 4 years and up to the end of July 2022.



- 2.3 The Act requires that requests for information are dealt with within 20 working days. This timescale commences the day after the request is received. The table below illustrates the number of requests received by the OPCC and how they were dealt with.

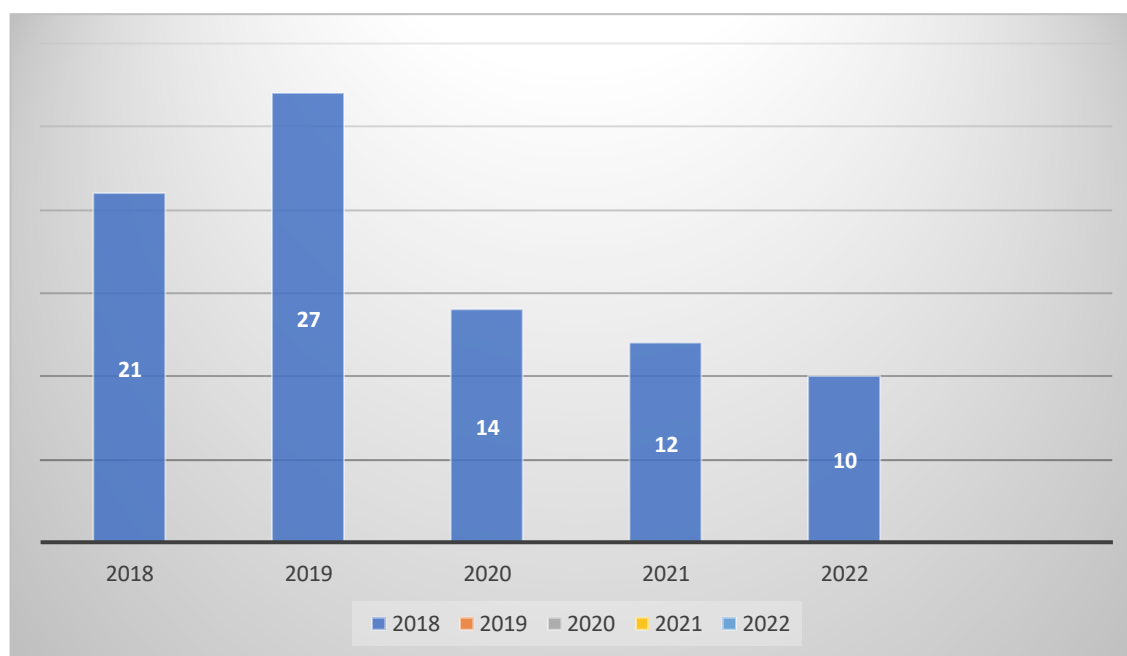
YEAR	N° of Requests Received	Within 20 working days	Over 20 working days	Request withdrawn	Internal Reviews	ICO Appeals
2018	51	48	3	0	0	0
2019	51	48	3	0	0	0
2020	28	26	2	0	0	0
2021	33	29	4	0	0	0
2022	22	20	2			

- 2.4 There are a number of reasons why a request cannot be dealt with within the 20-working day timescale. In cases where the request is taking longer to process, under Section 10 of the Act where a qualified exemption is being applied a public authority may extend the deadline for consideration of public interest tests for a time which is reasonable. In 2022 the two cases which were over 20 days were dealt with within 21 days. In the last 3 years the OPCC has not had any appeals dealt with by the ICO.

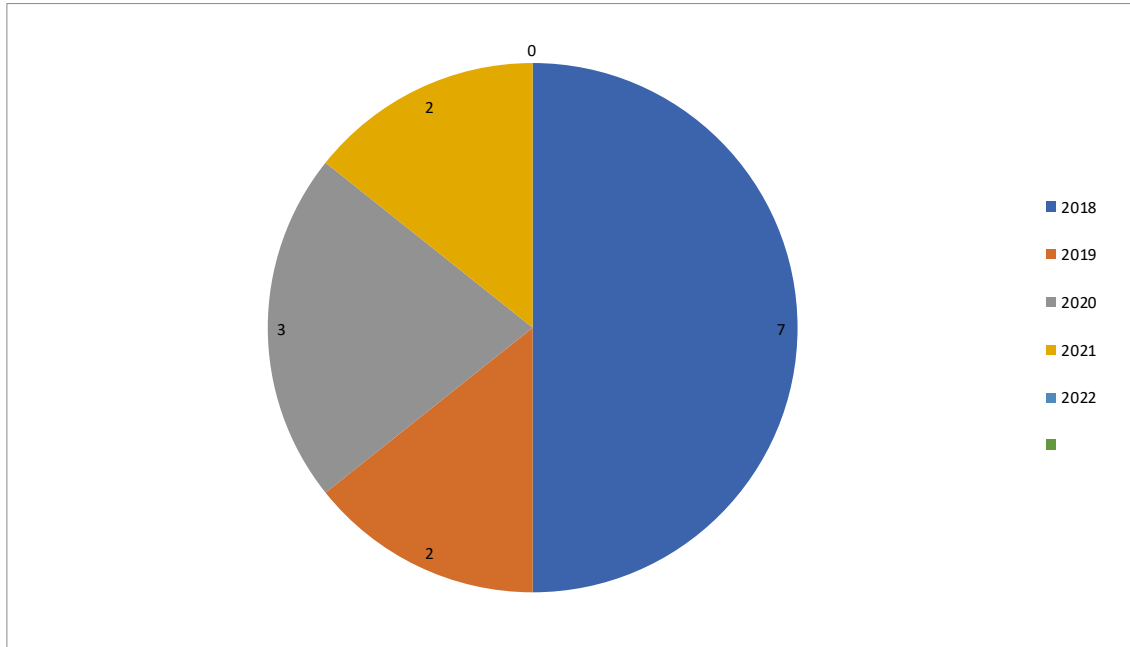
#### 2.5 Information Provided:

The Office of the Police and Crime Commissioner received varied requests during 2021 and the first seven months of 2022. Where information was provided most related to funding/grant applications and the business of the Partnerships and Commissioning Team. Several requests related to PCC elections.

- 2.6 Having received a request, where the OPCC does not hold the information as the information requested relates to the Constabulary; the requestor is advised of this and where appropriate provided with the contact details of the Constabulary. Figures included below:



- 2.7 The chart below illustrates the number of requests where information was not disclosed due to an applied exemption. Up to the end of July 2022 no requests which the OPCC has responded to have had an exemption applied.



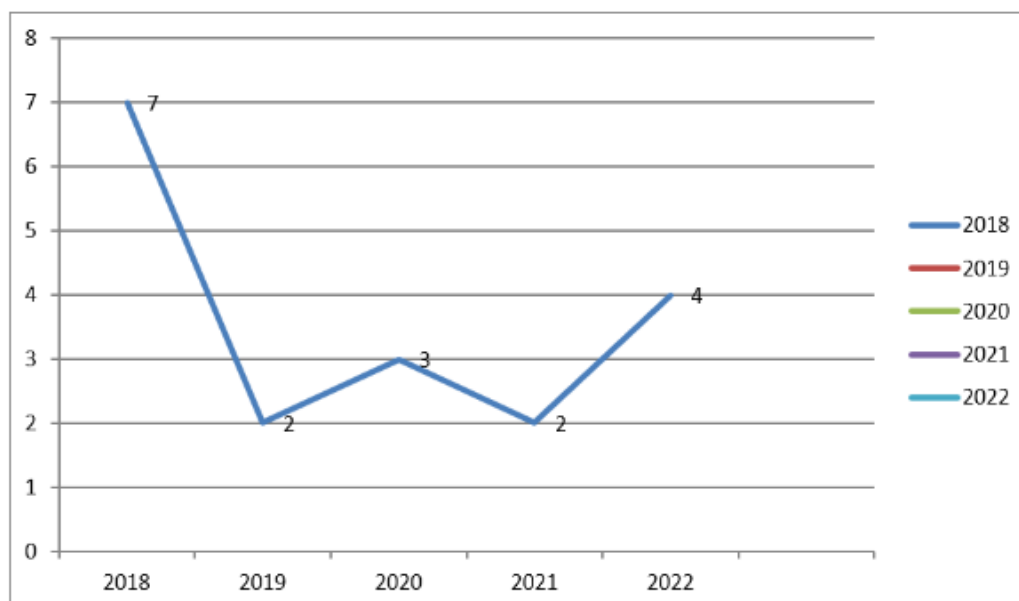
- 2.8 The Commissioner is required under the Elected Local Policing Bodies (Specified Information) Order 2011 to publish information in relation to the following:

- Who they are and what they do
- What they spend and how they spend it
- What their priorities are and how they are doing
- How they make, record and publish their decisions
- What policies and procedures govern the operation of the office of PCC
- Public disclosure of a register of interests

- 2.9 The OPCC endeavours to be as open and transparent as possible with regards to the work it and Commissioner carries out. By taking this approach it also enables members of the public to access such information and therefore negate the need for the public to request information via the FOI Act.

### **Data Protection Act – Subject Access Requests**

2. 10 Up to the end of July 2022 the OPCC received 4 Subject Access Requests. Below is a chart detailing the number of requests received in the last 4 years. As can be seen, the OPCC does not as a matter of course receive or deal with large quantities of SAR's. Since lockdowns in 2020, more people have communicated with the OPCC with SAR requests.



- 2.11 The Act requires that Subject Access Requests for information are dealt with within one month. This timescale commences the day after the request is received. The table below illustrates the number of requests received by the OPCC and how they were dealt with in comparison with previous years.

YEAR	N° of Requests Received	Within 1 month	Over 1 month	Request withdrawn	ICO Appeals
2018	2	2	0	0	0
2019	3	3	0	0	0
2020	0	0	0	0	0
2021	4	4	0	0	1
2022	4	4	0	0	0

- 2.12 During 2022 no Data Protection breaches have been identified.

### 3. Joint Data Protection Officer

- 3.1 With the introduction of the Data Protection Act 2018 and the General Data Protection Regulations (GDPR) on 25 May 2018, the OPCC was required to appoint a Data Protection Officer. Their role is to inform and advise the Data Controller of their obligations under the UK GDPR and other relevant data protection laws; and be the first point of contact for the Information Commissioner.
- 3.2 A Data Protection Officer monitors compliance with data protection laws, including managing internal data protection activities, advise on data protection impact assessments, train staff and conduct internal audits. To enable them to carry out this role they must

have professional experience and knowledge of data protection law proportionate to the type of processing carried out by the organisation.

- 3.3 The legislation allows for an individual to be appointed as a Data Protection Officer by more than one data controller, taking into account of their organisational structure and size. With this in mind, the Office of the Police and Crime Commissioner agreed that they would have a Joint Data Protection Officer (JDPO) with the Constabulary.
- 3.4 This arrangement has worked well since its introduction with the OPCC receiving professional support and guidance from the appointed JDPO. It has also enabled oversight of both organisations to identify any issues or trends.
- 3.5 A Personal Data Breach guidance document was developed to allow all members of staff to be aware of the requirements when reporting a breach. Any breaches in relation to information once identified must be notified to the Joint DPO within 72 hours, who will then deal with them appropriately.
- 3.6 On a six-monthly basis the OPCC Deputy Chief Executive, the Joint DPO and the OPCC Governance Manager meet to discuss any identified issues, emerging trends and themes. It also ensures knowledge and processes are up to date.

#### **4. Implications**

- 4.1 Financial - failure by the OPCC to comply with legislation could lead to financial penalties up to 20m Euros.
- 4.2 Legal – Freedom of Information Act, Data Protection Act and the General Data Protection Regulations are statute and the OPCC is thereby required to comply with them. Failure to do so could lead to financial penalties or legal proceedings.
- 4.3 Risk - should the OPCC fail to ensure that it processes and stores data in line with legislation it risks heavy financial penalties, adverse publicity and potential litigation.
- 4.4 HR / Equality - the new legislation has increased the rights of individuals to have their information processed fairly and where necessary removed.
- 4.5 I.T – the OPCC website has been updated to ensure that it complies with legislation.