



**Title**                      **Professional Standards Reporting**

**CCMT Sponsor**        **Deputy Chief Constable**

**Department/Area**    **Professional Standards**

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## **1.0 Rationale**

1.1 This policy is a key part of the Association of Chief Police Officers Corruption Prevention Strategy, and responds to recommendations made by the then Commission for Racial Equality and HMIC that every police force has an independent confidential reporting line where staff can feel confident to report inappropriate behaviour of colleagues.

1.2 Nationally it is considered best practice for all police forces to have such a policy so that all their staff can have confidence in the reporting mechanisms available to them. This policy borrows extensively from the National Template for Professional Standards Reporting.

## **2.0 Intention**

2.1 All staff should feel a genuine obligation to report breaches of professional standards - their motivation arising from a desire to maintain the integrity of the Police Service, and with the knowledge that such action will be universally acknowledged as 'doing the right thing.'

2.2 This policy aims to set out the ways in which individuals within Thames Valley Police can engage in reporting the inappropriate behaviour of colleagues in a supportive and confidential environment.

2.3 The service is aimed primarily for reporting corruption, misconduct, all aspects of discrimination, bullying and health and safety issues, but will not prevent a person from reporting any concerns of inappropriate behaviour.

## **3.0 General Principles**

3.1 Breaches of professional standards include criminal activity, unethical behaviour, breaches of the 'Standards of Professional Behaviour', malpractice and dishonesty.

3.2 **All staff have a clear responsibility to report suspected corrupt, dishonest or unethical behaviour by others in Thames Valley Police.** Indeed, Regulation 3 and Schedule of the Police (Conduct) Regulations 2008 states 'police officers report, challenge or take action against the conduct of

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colleagues which has fallen below the standards of professional behaviour expected. The Police Staff Council have an identical clause in the Standards of Professional Behaviour for police staff.

3.3 All staff should feel that they can report corruption, dishonesty, criminal activity and unethical behaviour openly and with the support of their colleagues and managers. Members of staff who make reports should do so in the knowledge that they may be required to give evidence and support a criminal prosecution and/or misconduct proceedings where appropriate.

3.4 It is recognised that current societal culture does not always provide a supportive environment for such reporting. In some instances, a member of staff making a report may wish to remain anonymous. On other occasions a member of staff may wish to have his or her information treated confidentially but will be prepared to supply their own details. This policy encourages open reporting but makes provision for other methods to improve staff confidence in internal systems, and their willingness to make professional standards reports.

### **Background Information**

3.5 In the past, cultural pressures within the British police service have actively discouraged individuals from reporting wrongdoing. These cultural pressures arise from the excessive demands of 'comradeship' that inherently exist within the police service. Loyalty to colleagues above any other competing loyalty is a feature of this culture. Essentially, this has meant that, on occasions, staff have presented a united 'wall of silence' and, therefore, have not reported misconduct.

3.6 As a result of these cultural pressures, there have been cases when an individual has openly made a report, where this has been seen by peers as an act of treachery and disloyalty. This, combined with inadequate organisational support, frequently leaves the individual who made the report feeling victimised by the process.

3.7 Whilst in recent times there has been a greater willingness to report breaches of professional standards, and to support those who do so, this process of change must continue. The challenge is to build upon this progress and implement a clear and comprehensive reporting policy that provides:

- clear and effective mechanisms for 'open' and 'confidential' professional standards reporting;
- comprehensive arrangements for supporting staff who, in good faith, make such a report;
- acknowledgement of the potential impact on an individual, department and/or the Service; and
- support to other strands of the force Corruption Prevention Strategy.

3.8 This policy may be used by staff to make such reports, and

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complements, but does not replace, the following existing policies and procedures:

- Grievance Procedure
- Police Officer Conduct
- Police Staff Disciplinary
- Unsatisfactory Performance and Attendance – Police Staff
- Police Officer Unsatisfactory Performance and Attendance
- Public Interest Disclosure Act 1998.

### **Public Interest Disclosure Act 1998**

3.9 The aim of the Public Interest Disclosure Act, which came into effect on 2 July 1999, is to ensure that information in the public interest is brought to the attention of the appropriate person in order that wrongdoing can be dealt with speedily. It encourages disclosure of information by giving statutory protection against victimisation and unfair dismissal to individuals who make 'protected' disclosures in good faith about certain acts of wrongdoing, or dangers in the workplace. It does so primarily by inserting new provisions into the Employment Rights Act 1996.

3.10 The Act applies to 'workers' which includes members of the police staff. Although police officers were specifically excluded under this Act, Section 37 of the Police Reform Act 2002 amends the definition of 'worker' in Section 43K ERA to include them. Under the Police Reform Act 2002 (Commencement No 9) Order 2004 SI Number 1319 officers can receive statutory protection from 1<sup>st</sup> April 2004.

3.11 The types of disclosures which individuals are encouraged to report under this Act includes information relating to:

- a criminal offence;
- the breach of a legal obligation;
- a miscarriage of justice;
- a danger to the health and safety of an individual;
- damage to the environment;
- deliberate covering up of information in respect of any of the above matters.

Clearly the scope of this Act goes further than this policy e.g. it specifically includes health and safety issues.

3.12 Individuals who are protected by the provisions of the Act can complain to an Employment Tribunal if they have been subjected to a detriment as a result of making a protected disclosure. The remedies available to a tribunal include reinstatement, re-employment, and compensation.

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## **Guiding Principles**

### **3.13 Confidentiality**

While we encourage open reporting, reports may be made confidentially by any member of staff. Confidentiality when requested will be given the utmost priority. All staff should be aware that the legal rules governing 'disclosure' would apply to cases under this procedure as they apply to all others. Where confidential information has been received this will be handled for disclosure purposes in a similar way to criminal intelligence. It will be possible to report issues anonymously but this is not the preferred method.

### **3.14 Published and accessible procedure for Reporting**

The procedure for reporting will be readily available to all staff by Intranet and published on the Force Professional Standards Department Intranet site.

### **3.15 Multiple methods of reporting**

The policy provides for a number of different mechanisms through which breaches of professional standards can be reported both openly and confidentially.

### **3.16 Immediate feedback that a member of staff is 'Doing the Right Thing'**

It is vital that immediate and positive feedback is given to an individual who makes a report, where their identity is known. The term 'doing the right thing' will be encouraged.

### **3.17 The term 'Whistleblower' will not be used**

It is evident that the term 'whistleblower' is deeply upsetting to those who report wrong-doing. For this reason, it will not be used in the policy document and is not to be used in documentation in individual cases. The term 'Professional Standards Reporting' will be used.

### **3.18 Arrangements for supporting personnel**

Having established effective mechanisms through which members of staff can make reports, it is necessary to create an organisational climate where staff feel confident to report misconduct and corruption. The ethos underpinning the strategy is that where an individual reports breaches in standards they will be valued and supported throughout the process.

In most cases the person making the report will be a confidential source or a witness and/or a victim of a crime. The force is committed to providing an enhanced service to such staff in a similar way to that provided to vulnerable victims and witnesses in high priority crime cases. A separate policy for the care of witnesses has been prepared by the Professional Standards

Department and is also available on the Force intranet site.

### **3.19 Visible Leadership by Management**

Visible, active, and supportive leadership must be demonstrated by line managers when dealing with an individual who has made an open report.

### **3.20 False and malicious allegations**

The integrity and accuracy of information must be fully investigated. In all cases, but especially where the information is anonymous, evidence or other intelligence will be sought at the earliest opportunity to corroborate the information received. Where it is clear, beyond reasonable doubt to the Deputy Chief Constable, that a report was made maliciously, an investigation may take place and consideration given to disciplinary/misconduct action. Such an investigation would only be initiated after careful consideration by the Deputy Chief Constable.

### **3.21 Immunity from discipline/misconduct proceedings**

Immunity from discipline/misconduct offences may be given for staff who are able to give evidence of criminal activity, and serious breaches of discipline. It would only be given after careful consideration by the Deputy Chief Constable. Criteria to be considered include:

- the evidence being given is essential;
- the evidence is needed to support a successful prosecution; and
- the member of staff concerned has not taken part in the criminal offence, or the serious breach of discipline or gained from it.

Immunity could therefore only be considered in non-serious misconduct cases. As a rough guide, the sanction for a non-serious misconduct offence would be unlikely to exceed a written warning.

### **3.22 Mitigation in crime and serious discipline/misconduct cases**

The arrangements and facilities provided in criminal courts, whereby the fact an offender has assisted the police in their enquiries is made known to the trial judge and it is taken into consideration by him in mitigation of the sanction, will be applied in suitable cases involving staff who fall within this policy. *It will therefore be for the member of staff concerned, their Staff Association representative or legal representative if applicable to inform the Head of Professional Standards Department that this is their wish. The Head of PSD will prepare a short confidential note outlining the assistance provided for the information of the Tribunal Chairman when deciding upon the appropriate sanction.*

## **4.0 Guidance, Procedures & Tactics**

### **4.1 Appointment of CCMT overseer**

The Deputy Chief Constable is appointed in all cases to oversee the process outlined in this policy. Where such a case involves allegations against colleagues who are line managed by the Deputy Chief Constable, consideration will be given to appointing another member of the Chief Constable's Management Team. This officer has particular responsibility for ensuring that the appropriate support is provided to individuals who make professional standards reports. Individuals who have made reports can at any stage have direct access to the designated Chief Constable's Management Team member in order to discuss personal concerns.

Where an allegation involves a member of the Chief Constable's Management Team, this will be directed to the Chair of the Police Authority at the earliest opportunity.

### **4.2 Mechanisms for reporting wrongdoing**

If a member of staff has reason to believe they have information pointing to a breach of professional standards, then it should be reported as soon as practicable.

There are a number of ways in which staff can make such reports. These are set out below. It is for the individual making the report to choose which method is the right one for them.

### **4.3 Reporting direct to line management**

This method has always been available to members of staff. It has the advantage of enabling an immediate response, where appropriate, and direct feedback to the individual. It is important that line management have a clear understanding of their role and responsibilities when presented with this type of information. Managers must also consider whether a report is suitable for the force grievance procedure and be aware of that policy.

Where the breach of professional standards is believed to involve the person's line manager, or where for any reason it is felt more appropriate to report it to another manager, this may be done. If there is doubt as to who is an appropriate manager then advice may be sought from the Professional Standards Department or alternative methods of reporting may be chosen.

### **4.4 Confidential telephone line – "I-Line"**

A confidential phone reporting system is available to all staff. This facility, called "I-Line" (Integrity Line) is for internal use only (0800 111 4444). Below is a rough guide to the service that will be provided.

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1. The "I-Line" will have its own 0800 number (0800 111 4444) and will be a free call from all landlines and will be available to participating police forces.
2. Trained personnel will take calls in the 24/7 Crimestoppers Bureau.
3. Each call will be answered with "You are through to I-Line"
4. Callers will not be asked any personal questions which may seek to identify them.
5. No calls will be tape recorded.
6. All information will be sanitised to remove anything that may identify a caller.
7. Where a caller is prepared to speak with a source handler in the PSD, this will be facilitated wherever possible.
8. Callers will be encouraged to provide further information wherever possible and they will be provided with a unique caller ID reference in order to collate responses.
9. The normal standards of anonymity afforded to Crimestoppers will be adopted for callers on the I-Line and calls will never be traced.
10. All information will be retained on a Crimestoppers database and will only be disseminated to identified police Professional Standards contact/s.
11. Dissemination will be carried out by secure e mail and where the information is timely will also be transmitted by telephone to an identified point of contact.
12. No rewards will be offered for information.
13. The police force will be offered freedom to market I-Line as it sees fit (subject to the approval of the Director of Crimestoppers).
14. The line may be used pro-actively to address any particular perceived problem.

### **4.5 Concerns brought through the Staff Associations**

The Police Federation, Superintendents' Association, Unison, and support groups such as the Support Association for Minority Ethnic Staff can, and do, play a key role in acting as an agent through which members can relay their concerns in a non-threatening environment. They are used to dealing with issues in a confidential way.

The Federation, Unison and other associations in this process offer independent advice on whether a particular case merits formal reporting. These organisations are bound by their own internal rules regarding confidentiality and the need for a member's consent prior to the forwarding of information.

### **4.6 Concerns brought to the direct attention of the Professional Standards Department**

This alternative has always been available and contact may be made verbally, in writing, by E-mail, fax or by a personal face-to-face meeting. Such an approach will be dealt with by staff experienced in dealing with cases

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involving allegations of breaches of professional standards. When direct reporting is chosen, an agreement on the status of the report and the degree of confidentiality necessary will be made between professional standards and the person reporting. This agreement will be recorded in writing.

Reports can be made anonymously. Such information will be treated with caution and corroboration sought at the earliest opportunity.

This particular method of reporting provides an element of independent and objective assessment of the information provided at the earliest stage. This is beneficial to both the Force and to the person reporting.

### **4.7 Concerns brought to the direct attention of the Police Authority Team (where applicable)**

The 'Internal Audit' carries out audits and investigates possible fraud in relation to Police Authority funds and property. Criminal cases are referred after initial investigation to the appropriate investigating officer. Police staff misconduct cases are referred after investigation to the appropriate personnel officer and line manager for disciplinary action. The Personnel Department may investigate alleged, non criminal, misconduct by police staff. Where this is the case they should be identified with a similar reporting mechanism.

The responsibilities of the 'Internal Audit' are set out in force policy documents. Any member of staff can contact the 'Internal Audit' investigators verbally, in writing, by facsimile or in person. All these approaches are dealt with by experienced investigators. The point of contact for the Internal Audit is via the Police Authority Treasurer.

### **4.8 Report to Criminal Cases Review Commission**

The Public Interest Disclosure Act identifies the Criminal Case Review Commission (CCRC) as the body to which any member of a police service can bring to notice any allegation of a miscarriage of justice without fear of recrimination or retribution. The CCRC is the body designated by the Criminal Appeal Act 1995 for the review of miscarriages of justice.

Any members of the Police Service can raise concerns with the CCRC in accordance with this policy:

By letter to: The Chairman  
Criminal Cases Review Commission  
Alpha Tower  
Suffolk Street, Queensway  
Birmingham B1 1TT

Phone: 0121 633 1800

Fax: 0121 633 1823

E mail: [complaints@ccrc.x.gsi.gov.uk](mailto:complaints@ccrc.x.gsi.gov.uk) or [info@ccrc.gov.uk](mailto:info@ccrc.gov.uk)

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#### **4.9 Concerns raised through the Independent Police Complaints Commission**

The Independent Police Complaints Commission is an independent body whose purpose is to see that whenever a complaint is made about a police officer's conduct by a member of the public, it is dealt with thoroughly and, above all, fairly. All members of the Police Service can raise concerns within this policy:

By letter to: The Independent Police Complaints Commission  
90 High Holborn  
London WC1V 6BH  
Phone: 0207 166 3000 or 08453 002 002 (local rate)  
Fax: 0207 404 0430  
E mail: [enquiries@ipcc.gsi.gov.uk](mailto:enquiries@ipcc.gsi.gov.uk)  
[www.ipcc.gov.uk](http://www.ipcc.gov.uk)

The IPCC/CCRC will action the concerns, ensuring that the individual reporting is kept apprised of progress.

Whilst the IPCC/CCRC will encourage open reporting, confidentiality, when requested will be given the utmost priority. All staff should be aware that legal rules governing disclosure could apply.

#### **4.10 Range of options**

The above range of options is designed to afford staff flexibility in the way they make reports. The choice of which route to take lies with the individual. Whichever one is selected, it is vital that the initial response is positive, robust and supportive.

It is acknowledged that there are a number of other routes through which reports might first come to notice e.g. in force Occupational Health Service, Welfare Services or HR units. When reports are brought to notice this way, the role of receiving staff will be to provide support, and ensure confidentiality is respected and explained. They should then help the individual concerned to identify the most suitable way of formally reporting the breach of professional standards.

#### **4.11 Tangible support to the individual making a Report**

When open reports have been made i.e. the identity of the individual and the fact of the report is known to his or her colleagues, appropriate support must be given to the individual from the outset of the case and must continue until the issue is fully resolved. This includes pro-active management support and action, staff association and trade union involvement and advice on access to professional personnel support services.

#### **4.12 Statement of expectations**

In both open and confidential cases an agreed statement of expectations based on a risk assessment and the guiding principles will be drawn up. It will summarise what each party can expect from the other and outline the minimum level of support we will give to staff who make professional standards reports. This will act as the benchmark against which steps taken in each case will be judged.

The agreed statement of expectations will be handed to the person who has made the report.

#### **4.13 Role of Line Managers**

Line managers will be required to ensure that:

- actions outlined in this policy are undertaken.
- an environment where members of staff are confident in coming forward to make such reports is developed and maintained;
- in open cases, where the identity of the individual and the fact that a report has been made is known to colleagues, such reports are responded to promptly, genuinely and with sensitivity ;
- the individual's actions are acknowledged as right and their approach to them is both supportive and positive;
- protection from victimisation or harassment is provided;
- positive and robust action is taken in cases of victimisation or harassment;
- action is taken to prevent any other adverse repercussions;
- only positive and supportive comments are reflected on the individual's personal file, and then only when the individual concerned agrees to their inclusion; and
- in every case reported that falls within the terms of this policy, a 'confidential' report, outlining the circumstances and initial action taken, will be forwarded immediately to Professional Standards Department. Initial action will remain the responsibility of the line manager and may include a request for appointment of an Investigating Officer and actions normally taken on commencement of an internal investigation.
- Line Managers are encouraged at their earliest convenience to themselves seek support and guidance from Professional Standards Department. If necessary, via the PSD on-call rota.

#### **4.14 Role of Professional Standards Department**

Professional Standards Department will undertake the following:-

- Provide support, guidance and advice at every stage of the process;

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- Monitor progress of each case from beginning to end;
- The collation, analysis and dissemination of intelligence (where appropriate);
- Ensure Confidentiality issues are properly handled in accordance with this policy;
- Mark case papers from the point at which report is made, through investigation, to prosecution stage, either criminal or discipline, indicating that the case falls within this policy;
- Ensure compliance with the policy;
- When appropriate keep the person who has made the report updated; and
- Act as conduit for identifying good practice.

### 4.15 Role of the Reference Group Meeting

When an investigation into a suspected breach of professional standards is initiated as a result of an open report under this policy, consideration will be given to holding a meeting between the Senior Investigating Officer and the senior local line manager. The purpose of this meeting will be to inform managers of the investigation, its scope and seriousness and to formulate an agreed way forward. This is called an 'Inclusion Meeting'. In all such cases consideration will be given to calling an Inclusion Meeting. However, in difficult or sensitive cases, the head of the Professional Standards Department will be responsible for calling the Inclusion Meeting. The principles of Inclusion Meetings are as follows:

- a) closed and confidential
- b) to freely exchange information on the subject and decide on appropriate action/ way forward.
- c) to decide on actions, which could include:
  - protection matters arising from the risk assessment;
  - what can be discussed beyond the closed meeting;
  - who else can share the detailed information and to what extent;
  - details of what will be included in a support plan.

A record of decisions made will be kept in a registered file by the head of 'Professional Standards Department' representative or equivalent; and it will be subject to the appropriate protective marking.

Reference Group meetings will be chaired by the senior local line manager, with a 'Professional Standards Department' representative in attendance. The senior local line manager will have the discretion to invite other relevant individuals such as Staff Association, mentors etc., as circumstances dictate.

In difficult and sensitive cases the Reference Group meeting will be chaired by the head of Professional Standards Department or the head of Human Resources. Core members will be the senior local line manager and a 'Professional Standards Department' representative. Head of Professional Standards Department has the discretion to invite other members such as

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Staff Association, mentor, if appropriate.

The Deputy Chief Constable has been appointed in all cases to oversee individual cases that are within this policy. This officer will have particular responsibility to ensure that the appropriate support is provided to the individual who makes a professional standards report. The individual can at any stage have direct access to the designated ACPO officer in order to discuss personal concerns.

#### **4.16 Role of Force Occupational Health Service/Welfare Service**

The Occupational Health/Welfare Service will provide information, advice and support to managers and individuals on a range of health, safety and welfare matters. Support in this context will be offered to the individual member of staff, their partner and the Area/Department and includes:

- formal referral to Occupational Health;
- self referral to Occupational Health Welfare Counselling Service for one-to-one counselling; and group work which will be provided at the request of management and where the impact of the reporting is causing problems in the workplace. Such sessions should be voluntary, time limited and have a clear targeted focus. Group work can facilitate communication between staff and management and should have clear agreements about how confidentiality within the sessions is managed.

Occupational Health/Welfare Service provides a confidential service and its practitioners, Welfare Counsellors and OH Advisers adhere to Professional Codes of Conduct.

#### **4.17 Role of police Staff Associations and Unison**

The Police Federation, Superintendents' Association and Unison are experienced in providing support for their members in these circumstances. In addition to offering advice and guidance on an individual basis, they can also act on behalf of their members to highlight perceived organisational shortcomings.

It may be that the initial professional standards report is made to one of these bodies. Initially staff should be advised to contact their local representative. If this is not suitable, they should be directed to contact the relevant Secretary at Branch or HQ.

#### **4.18 Mentoring System**

When appropriate, selected members of staff will be assigned to work with a person who makes a professional standards report on a "one to one" basis to act as a mentor. This gives the reporting staff member a greater measure of support and confidence. An essential and important consideration in the appointment of a mentor is that the person selected must have excellent

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interpersonal skills and a determination and ability to see through a difficult process. Only appropriately skilled staff should fulfil this role. The mentor will be expected to act as a bridge between the individual and the organisation. Senior local line managers should ensure that sufficient time outside core duties is made available, both to the individual reporting and the mentor, to fulfil the requirements of this policy.

Area Commanders or Departmental Heads will take a personal interest in all cases affecting a member of their staff.

### **4.19 Witness Protection Issues**

It is anticipated that issues of witness protection will only arise in the most serious cases. A threat assessment will be undertaken at an early stage and the appropriate facilities and support provided.

A range of tactical options will be made available and 'tailored' to meet the requirements of the member of staff, commensurate with the threat assessment. These could include one or more of the following:

- advice on personal security;
- physical security measures at the individual's home (alarms, locks, etc.);
- moving home;
- moving to another place of work within their Police Force;
- moving to another Police Force;
- complete change of identity and relocation; and/or
- ensuring that the individual is not put in a situation where false 'counter allegations' could be made.

These cases will be dealt with by Professional Standards in consultation with line management and, where appropriate, the investigating officer.

### **4.20 Feedback on progress of investigation**

The member of staff making the report will be kept updated by the Investigating Officer on progress of the investigation. This is particularly important when open reporting has occurred. When confidential reporting has taken place the wishes of the staff member making the report should be established at the outset. If they wish to be kept informed this should be facilitated as far as is practicable without compromising confidentiality or imposing undue burdens on the investigation.

### **4.21 Debriefing of persons involved**

An important part of the process will be to facilitate a debrief with the individual making the professional standards report. A debriefing session can often act in a therapeutic way for individuals and also provides an opportunity to identify both good and bad practice. It is a two-way process where outstanding issues and concerns can be raised by the individual, and the

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Service can restate its commitment to the process.

Debriefings will take place throughout the course of an investigation by the Investigating Officer following consultation with Professional Standards when appropriate. However, at the end of the case a full debrief must be undertaken irrespective of any previous debriefs. Staff conducting debriefing must consider disclosure issues in criminal cases if written records are made.

#### **4.22 Reward/Recognition System**

There will be occasions when a Police Force would wish to recognise the actions of an individual who has made a professional standards report. This might include a letter of appreciation or a private ceremony with a senior member of staff. In some circumstances, consideration may be given to awarding a formal commendation in public or in private.

It remains important to consider each case on its merits and be guided by the wishes of the individual concerned.

#### **4.23 Return to work following prolonged period of absence**

A person making a report may experience a greater level of stress and anxiety as a result. Whilst support processes will attempt to minimise this problem, stress may on occasions lead to a period of absence from work. In these cases it may be necessary to make special arrangements to facilitate an individual's return to work. To assist with the decision making process the head of Professional Standards Department or the Department/Area Commander (or equivalent) may wish to convene a Reference Group meeting. In these circumstances, and in all other interventions, a risk assessment will be conducted.

In these cases the force should consider all the circumstances when making deployment/ promotion decisions.

#### **4.24 Remit for management of the policy**

The head of Professional Standards will have responsibility for the management of this policy, and this will be achieved by reviewing all cases notified to Professional Standards to ensure the aims are being achieved.

### **5.0 Challenges & Representations**

Challenges/representations in respect of this policy should be addressed to:

Head of Professional Standards  
Headquarters  
Oxford Road  
Kidlington  
Oxon OX5 2NX

## **6.0 Communication**

### **6.1 Links to Police National Legal Database/Other**

This policy should be read in conjunction with the policies listed at paragraph 3.8.

### **6.2 Implementation Strategy (Policy Impact Assessment)**

This policy will be available on the force Intranet site and the Professional Standards Site. The Confidential Reporting Line is advertised periodically throughout the force and on the PSD website.

## **7.0 Compliance and Certification**

### **7.1 Human Rights Audit**

This policy has been drafted in accordance with the Human Rights Act 1998 and the principles underpinning them, and audited by Mr C Kneafsey. It is considered to have no potential for engaging any of the Articles of the Convention. It does, however, enhance the likelihood of any trial or tribunal being fair, by allowing appropriate support to be available to those providing information which may ultimately lead to a trial or tribunal.

This policy document is not based on any legal basis. It is founded on what is considered to be good working practice.

This policy does not have the potential to discriminate.

### **7.2 Diversity Impact Assessment**

This policy has had a Diversity Impact Assessment carried out, it has a LOW/MEDIUM impact on the six stands of diversity.

### **7.3 Diversity (Human Resources)**

### **7.4 Management of Police Information (MOPI)**

Any information obtained as a result of this policy must be collected, recorded, evaluated, shared, retained and disposed of in accordance with the MoPI Code of Practice.

### **7.5 Data Protection**

When an open professional standards report is made, all documentation referring to it will carry a protective marking which limits access to it to those people who have a legitimate and lawful need to see it. Details of any professional standards report will be held within the Professional Standards Department under appropriate security. In confidential cases, knowledge of

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the identity of the person who has made the report will be kept to a minimum, based upon strict need to know criteria.

It is recognised that much of the personal data gathered as a result of this policy may be 'sensitive personal data' as defined by the Data Protection Act 1998. All personal data processed as a result of this policy will be managed to ensure compliance with the principles of the Data Protection Act 1998.

### **7.6 Freedom of Information Act**

This policy is not exempt under the Freedom of Information Act and will therefore be made publicly available. Copies can be obtained by writing to:

Policy Management Unit  
Corporate Development  
Thames Valley Police Headquarters  
Oxford Road  
Kidlington  
Oxon. OX5 2NX

### **7.7 Protective Markings**

This policy is not required to be protectively marked.

### **7.8 Health & Safety at Work**

Comprehensive advice, including risk assessment, can be found in the Home Office guidance Achieving Best Evidence in Criminal Proceedings: guidance for vulnerable and intimidated witnesses, including children.

Everyone dealing with a member of staff who reports a breach of professional standards should be alert to the possibility that they may suffer an adverse reaction due to the stress of their situation, especially if it is clear that other colleagues are aware of their reporting.

This policy is to be read in conjunction with the Force Health and Safety Manual, which sets out the requirement for documented risk assessment by a competent person when exposure to a particular hazard arising from workplace or pre-planned policing work activity can be said to be reasonably foreseeable.

### **8.0 Monitoring and Review**

This policy will be reviewed annually. The review will take into account any changes in legislation or guidance, court rulings, examples of good practice or any representations made by organisations or individuals.

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For use by the Policy Management Unit Only

Policy Authorisation

Policy approved at (e.g. meeting or committee):

Date policy signed off:

Policy signed off by:

\_\_\_\_\_  
(Name of relevant ACC)

\_\_\_\_\_  
(Signature)

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(Functional area)

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