

FOI Disclosures January 2024

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This month we have responded to questions relating to the following topics:

- [Training concerning autism spectrum conditions, physical disability and naturism](#)
- [Public Perception Tracker corruption figures for November 2022](#)
- [Qualifications of DP and FOI team members](#)
- [Suicide cases involving the police and Common Law Police Disclosure](#)

If you require a full copy of any of the embedded attachments, please contact Requestinfo@policeconduct.gov.uk quoting the reference number from the relevant response.

<u>Ref</u> 5024594 Back to top	<u>Training concerning autism spectrum conditions, physical disability and naturism</u>
<u>Request</u>	<i>I would like to enquire as to what training is provided to your staff concerning autism spectrum conditions, physical disabilities and the lifestyle of naturism</i>
<u>Response</u>	<p>Under The Equality Act 2010, persons with autism and physical disability are protected from discrimination where these conditions fall within the protected characteristic of 'disability' as defined in the Act. Information about how we comply with our public sector equality duty under the Equality Act can be found on our website here: Equality and diversity Independent Office for Police Conduct (IOPC). This includes our service standards for people who use our services.</p> <p>All new starters at the IOPC attend an induction course called "Understanding Equality and IOPC expectations". The content of this course is as follows:</p> <ol style="list-style-type: none">1. The Equality Act<ol style="list-style-type: none">a. What is discrimination?b. Overview of the Equality Actc. How we apply the Equality Act as a public organisationd. Unlawful vs unfair discriminatione. Protected characteristics + quiz2. Unlawful discrimination<ol style="list-style-type: none">a. Direct discriminationb. Discrimination by associationc. Discrimination by perceptiond. Harassment

- e. Victimisation
 - f. Indirect discrimination
 - g. Discrimination arising from disability.
 - h. Failure to make reasonable adjustments for disabled persons.
3. Duty to make reasonable adjustments
 - a. Organisational duties
 - b. Understanding disability as a protected characteristic
 - c. Physical impairments, mental impairments, substantial effect, long-term, day-to-day activities.
 4. When are reasonable adjustments required?
 - a. When the duty arises
 - b. The anticipatory duty
 - c. Where the duty applies
 - i. Premises
 - ii. Auxiliary Aids
 - iii. Policies/practices
 5. Assessing reasonable adjustments
 - a. Factors to consider
 6. Bias and stereotyping
 - a. Background to unconscious bias and stereotyping
 - b. Iceberg effect – unconscious and conscious mind
 - c. Evidence that discriminatory bias is a predictor of behaviour
 - d. Acknowledging biases – optional unconscious preference test
 7. Knowledge check

Our staff also receive equality and diversity development appropriate to their roles. If you require information about our equality and diversity training for persons in a particular role, for example, casework managers, investigators, or staff in our customer contact centre, please let us know.

There is no course on the specific subject of autism or autism-spectrum conditions. However, learning on this subject is covered in three IOPC e-learning courses. These are listed below together with the course summary for our staff.

- Neurodiversity - Language and communications: This module will provide you with a guide to appropriate use of language surrounding neurodiversity and how to communicate with neurodivergent people.
- Neurodiversity at the IOPC: In this module you'll find out about the benefits of a neurodiverse workplace, listen to the lived experiences of neurodivergent colleagues at the IOPC and reflect on your understanding of 'disability' and 'difference'. The module will help build awareness and understanding of neurodiversity and how neurodiverse individuals can be affected.
- Neurotypes: This module describes some of the more common neurotypes along with the assumptions and challenges they face in day-to-day society and the workplace. The module will also highlight the benefits of different neurotypes in the workplace.

There are also ad-hoc awareness events and communications covering these topics. These are hosted by our staff networks. The IOPC has invited an external organisation specialising in Neurodiversity in the workplace to

provide a training and awareness session to all staff (May). This session covered awareness of neurodiversity, terminology and language related to neurodiversity, neurodiversity and the Equality Act, the strengths and benefits of recruiting and supporting neurodivergent people in the workplace, and best practice on supporting neurodiverse people and people with a physical disability in the workplace. We also provided colleagues with support materials including; how to empower neurodiversity in the workplace; a workplace assessments guide, information to support line managers working with neurodivergent employees, and signposting to where further support can be obtained.

We also have a dedicated staff network who have led our activities on World Autism Acceptance Week and Mental Health Awareness Week. To support this work we have a cultural knowledge accountability approach to the work we undertake and in development of our workplace. This means that whilst we don't have a formal training programme, the organisation provides access to materials and events such as those set out above. We place a duty on our staff to seek out the knowledge they require to ensure inclusivity in the workplace and to ensure excellence in their work. Therefore, minimising and ultimately seeking to remove disadvantages suffered by people due to their protected characteristics.

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Our training does not cover naturism.

Ref
5024618
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Public Perception Tracker corruption figures for November 2022

Request

Page 14 of 'IOPC - Yonder Public Perception Tracker Wave 6 Summary Report 2023' includes responses to the following question:

' Why do you feel negative towards the police/your local police force?'
<https://www.policeconduct.gov.uk/publications/public-perceptions-tracker-summary-report-202223>

Responses are provided for June 2022 and November 2022. June's figure for 'corruption' is 13% but there is no 'corruption' figure for November. The accompanying notes state that: 'This question was open-ended, responses were coded into themes.'

1. Please provide the percentage for 'corruption' in November 2022. Perhaps it was so small that it was not published.

	<p><i>2. Please provide the rationale for any changes made to the themes. Include copies of related correspondence between yourselves and the research company on the matter.</i></p>
<u>Response</u>	<p>The Public Perceptions Tracker (PPT) data is collected in conjunction with the research agency Yonder. The PPT consists of an online quantitative survey carried out with general public using Yonder's omnibus platform.</p> <p>In response to your query in point 1, the percentage for 'corruption' in November 2022 is included on page 15 of the report (8%). 'Corruption' is a theme under the category 'systemic issues'. The categories are presented in order of the proportion of responses. In June 2022 the number of responses falling under the various categories was as follows:</p> <ol style="list-style-type: none"> 1. Failure to tackle crime / lack of presence (45%) 2. Systemic issues (40%) – corruption sits under this heading. 3. Specific incidents (30%) 4. Personal attributes (19%) <p>In November 2022 the order was as follows:</p> <ol style="list-style-type: none"> 1. Failure to tackle crime / lack of presence (56%) 2. Specific incidents (34%) 3. Systemic issues (32%) – corruption fits under this heading. 4. Personal attributes (18%) <p>In relation to your query in point 2, the themes were based on the public's responses to the question and kept the same where possible so that the data could be compared wave-on wave. A new theme would only have been added in November 2022 if responses did not fit into an existing theme from June 2022.</p>
<u>Ref</u> 5024623 Back to top	<u>Acting Director General of IOPC</u>
<u>Request</u>	<p><i>Can you please tell us the Public who has replaced ex-CEO Michael Lockwood ?</i></p> <p><i>Can you also help us with the interview process as to capabilities of the new CEO and what background history the new person has ?</i></p> <p><i>Could you please let us know exactly how many IOPC staff were previously serving Police officers OR employed within any Police Force before they took employment with the IOPC.</i></p>
<u>Response</u>	

	<p>The head of the IOPC is the Director General (DG) rather than a Chief Executive Officer (CEO). Tom Whiting was appointed Acting Director General in December 2022 following Michael Lockwood's resignation. Information about the background of Tom Whiting is available on our website here: Our people Independent Office for Police Conduct (IOPC).</p> <p>The IOPC Director General is appointed by the Crown on the recommendation of the Home Secretary and the Prime Minister. We therefore recommend that you redirect your question regarding the interview process to the Home Office as this is the appointing body. You can contact the Home Office using the following email address: foirequests@homeoffice.gov.uk.</p> <p>The number of IOPC employees who were previously employed as police officers or staff is published annually in our Diversity Report. The latest available information can be found on our website here: https://www.policeconduct.gov.uk/publications/staff-diversity-data-202223</p>
<p>Ref 5024621 Back to top</p>	<p><u>Qualifications of DP and FOI team members</u></p>
<p><u>Request</u></p>	<p><i>Data Protection Officers' Training and Qualifications: It would be appreciated if you could share some details on the types of training and qualifications that your authority recommends or provides funding for. I am particularly interested in understanding how these contribute to ensuring that your Data Protection Officers maintain a high standard in terms of Continuous Professional Development (CPD) and certification.</i></p> <p><i>Criteria for Consultants and New Recruits in Data Protection: Furthermore, I am curious about the qualifications or certifications that you look for when engaging with consultants or in the process of recruiting new team members for data protection and freedom of information roles.</i></p>
<p><u>Response</u></p>	<p>The following roles requiring specialist knowledge exist in our Data Protection and FOI Team:</p> <p>DPO Deputy DPO Senior FOI & DP Advisor Information Rights Officer DP Impact Assessment Officer</p> <p>It is not a condition of recruitment to these roles to hold any particular qualification, although a recognised qualification is included in the 'desirable' criteria when advertising vacancies. However, the persons who occupy these roles are normally required to obtain the PDP Practitioner Certificate in Data Protection with the support of the IOPC. Holders of this certificate are required with the support of the IOPC to keep their PC.dp. qualification up to date ('Continuing Professional Development') as specified in the PDP course details.</p> <p>Team members who deal with Freedom of Information requests also hold the Practitioner Certificate in Freedom of Information (pdptraining.com) There is no</p>

	<p>requirement for continuing professional development to maintain this certification.</p> <p>There are no DP Practitioner Certification requirements for consultants.</p>
<p><u>Ref</u> <u>5024640</u> Back to top</p>	<p><u>Suicide cases involving the police and Common Law Police Disclosure</u></p>
<p><u>Request</u></p>	<ol style="list-style-type: none"> 1. <i>IOPC materials used when reviewed suicide cases involving the police.</i> 2. <i>Confirmation of if someone commits suicide and blames a police force if the IOPC will conduct an inquest into that police force's interaction with the individual. Furthermore, whether this applies if the individual commits suicide overseas but still blames the police and particularly if there is British and foreign press attention, and possibly contact from the FCDO.</i> 3. <i>Information on whether the IOPC has ever investigated a police force for making a Common Law Police Disclosure, and also whether it ruled against the police force for making the CLPD. If so why, and what sanction was applied?</i> 4. <i>Information on whether the IOPC has ever intervened in a case involving the Prevent Strategy.</i> 5. <i>Information on how long Professional Standards Department investigations should take in terms of being acceptable according to guidance, and what is the longest time a PSD investigation has taken according to what is known by the IOPC.</i>
<p><u>Response</u></p>	<p>Question 1: There may be many different circumstances involved and incidents are considered and assessed on a case by case basis using available resources applicable to the particular situation, therefore we do not have guidance that is categorised in this way. Each year we publish a report : Annual Deaths during or following police contact. One of the categories of deaths that have been referred to us and is examined to produce statistics for this report is ‘<i>apparent suicide following police custody</i>’ which includes apparent suicides that happen within two days of release from police custody and that occur beyond two days of release from custody, where the time spent in custody may be relevant to the death. Chapter six contains further details and analysis of some of the cases that were examined as part of this report and you may find this helpful to your enquiries.</p> <p>Question 2: The IOPC does not conduct inquests as that is the job of the Coroner. We may investigate a case that is referred to us where there has been an apparent suicide following police custody. Whether or not we decide to conduct an independent investigation is assessed on a case by case basis and it is not possible to categorically confirm whether or not the situation you describe would be subject to an independent investigation. Information regarding our investigations and how we decide what to investigate can be found on our website here: Investigations Independent Office for Police Conduct (IOPC).</p> <p>In terms of the second part of this question, our remit covers all police forces in England and Wales, however if someone died by suicide whilst abroad after contact with a police force in England and Wales then we may investigate if the matter was referred to us. Once again it depends on the circumstances as</p>

matters are assessed on a case by case basis. As per the definition contained in the 'Annual Deaths during or following police custody' report the definition for 'apparent suicide following police custody' includes the following situations: "Apparent suicides following time in police custody are included in these statistics if they happen within two days of the person's release from custody. They are also included if experiences in custody may have been relevant to the death, and the death was referred to the IOPC. The police may not always be told about an apparent suicide that happens after time in custody as the association may not be clear.

Question 3: We have no automated way of searching our systems to obtain comprehensive information from which we could answer this question. This means that we cannot identify IOPC cases without extensive manual searches, other than where we have already carried out relevant research or completed a data verification exercise that captures a specific case type. The IOPC has not carried out any research of its own into incidents or complaints involving Common Law Police Disclosures and there is no straightforward way of identifying incidents of this type from our cases.

Question 4: We have concluded that the activities required to locate cases that fell within the scope of your request would be highly likely to exceed the cost limit of £450 (or 18 hours work) as prescribed by the FOIA and associated regulations, with the result that we are not required to carry out this work.

We refer you to our response to question 3 above as the same applies here. We have no straightforward way of identifying cases that fall within the specific scope of your request and the manual activities involved to locate and extract would undoubtedly exceed the cost limit prescribed by the FOIA and associated regulations.

Question 5: Investigations can vary in length depending upon specific circumstances and complexity. The [Statutory Guidance](#) provides guidance to police forces to help them to achieve high standards in the handling of complaints and to comply with their legal obligations. Pages 97 to 99 provide guidance on the timeliness of investigations.

We do not hold information regarding the longest investigation undertaken by a Professional Standards Department and you would need to request this information from police forces. We collect certain information from police forces and publish an annual report – '[Police complaints statistics for England and Wales](#)'. Page 34 of this report provides information on the average number of days to finalise complaint cases which you may find helpful. You should read this report in conjunction with the '[Guidance on capturing data about police complaints](#)'.