

FOI Disclosures August 2025

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

- [IOPC investigation relating to Manchester Airport incident](#)
- [Code of Conduct for IOPC employees](#)
- [Investigation report relating to Operation Gullane](#)

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> <u>5025631</u> <u>Back to top</u>	<u>IOPC investigation relating to Manchester Airport incident</u>
<u>Request</u>	<i>I am writing to formally request information under the Freedom of Information Act 2000 regarding the investigation conducted by Greater Manchester Police and/or the Independent Office for Police Conduct into the incident at Manchester Airport on 23 July 2024 involving the Akhtar family and two police officers.</i> <i>Specifically, I request the following details:</i> <i>1. Whether Greater Manchester Police or the IOPC attempted to contact Qatar Airways or its cabin crew for evidence related to the alleged racist incident aboard flight QR023 arriving on 23 July 2024.</i> <i>2. Whether any crew statements, in-flight incident logs, or passenger complaints were obtained or reviewed as part of the investigation.</i> <i>3. Whether Qatar Airways was asked to provide CCTV, staff reports, or communications logs.</i> <i>4. Any reasons documented by GMP or IOPC for not pursuing in-flight evidence.</i>
<u>Response</u>	The matters you raise do not fall within the terms of reference of the IOPC investigation, which relates to the actions of GMP officers at the airport. Therefore, this information is not held by the IOPC and we recommend that you contact Greater Manchester Police to find out whether they can assist with your request.
<u>Ref</u> <u>5025710</u> <u>Back to top</u>	<u>Code of Conduct for IOPC employees</u>
<u>Request</u>	

Would you be willing to allow me to see you conduct policy regarding conduct in a public office

Response

Please find below the Code of Conduct for IOPC employees:



Code of Conduct for IOPC employees

Feb 2025

Foreword from the Director General

The IOPC's principal operational statutory purpose is to secure and maintain public confidence in the police complaints system in England and Wales. As we are the independent guardians of the system, the public's perception of and trust in how we conduct ourselves as public servants is essential.

This document is the IOPC's approved code of conduct for all staff, up to and including all members of the Board. It sets out the standards of behaviour and practices that you, as a member of our staff, are expected to follow in discharging your responsibilities. The code has been developed in consultation with staff.

It is a requirement of your role that you familiarise yourself with the code and what it means for you personally. You need to ensure you understand the organisation's expectations of you, so please discuss with your line manager if you need any further guidance or have concerns as to how any aspect might apply to you. Acting in accordance with the values of the organisation and this code matters for each and every one of us.

This code is based on Cabinet Office guidance but importantly, it has been developed to reflect the IOPC's unique role and our organisational values.

If you have any queries on how the code applies to you or colleagues, then please raise them with your line manager. The People Directorate can also offer further help or advice on the interpretation of the Code.

Non-executive directors are public appointments. As such they are subject to a separate Code of Conduct, published by the [Cabinet Office](#).

Rachel Watson
Director General

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IOPC Values

The IOPC is a values-based organisation. People will work for it because they believe in what it is trying to do. The IOPC's five organisational values are:

- We seek the truth
- We are inclusive
- We empower our people
- We are transparent
- We make a difference

These values underpin all our work and staff are encouraged to pro-actively consider them in all aspects of their roles. They are part of our recruitment criteria and are reinforced through induction and training and articulated in actions and words by those who lead the organisation. At times living these values while delivering our statutory duties will be challenging, but we recognise they are aspirational and help to inspire us in delivering our roles.

Standards of behaviour

The nature of the IOPC's business means that the way in which we conduct ourselves and go about our business is as important as the results we deliver. We are expected to carry out our roles with dedication and commitment to the IOPC, its values and code of conduct. Outlined below are the standards of behaviour by which all IOPC employees should conduct themselves and should expect to be treated.

As an IOPC employee you are expected to:

- Always act in a way that is professional and that demonstrates and maintains the confidence of all those with whom you have dealings.
- Treat colleagues, members of the public, stakeholders and any other individuals you come into contact with through your role with courtesy, consideration and fairness. Aggressive or bullying behaviour will not be tolerated in any form.
- Demonstrate respect for others' background, experience and the different perspectives this may bring to a situation.
- Respond constructively to others' ideas, points of view and input, whether or not they reflect your own position. Where appropriate opportunities should be taken to consult on matters that affect others.

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- Maintain the ICPC's independence in all your dealings and where necessary identify any issues that may have an actual or perceived impact on you or the ICPC's independence. (See [Conflicts of Interest](#))
- Learn from mistakes when they happen, work positively to resolve them and where appropriate share learning within the organisation.
- Challenge or report inappropriate behaviour directed at yourself or others that you may encounter in delivering your duties. (See [Respect for the Code of Conduct](#))
- Deliver your duties in line with the code of conduct and supporting policy. Should you become aware of a matter that contradicts any one of these you should alert your line manager or other appropriate manager.

As an ICPC employee you should not:

- Misuse your official position, for example by using information acquired in the course of your official duties to further your private interests or those of others.
- Accept gifts or hospitality or receive other benefits from anyone that might be perceived by others to compromise personal judgement or integrity (see [Gifts and Hospitality](#))
- Use your position to discriminate unlawfully or pressure others to discriminate unlawfully (see [Valuing Diversity](#))

As an employee of the ICPC you can expect:

- To be treated with courtesy, consideration, fairness and respect by colleagues at all grades within the organisation
- To receive appropriate support from your manager including regular 1:1 conversations.
- To be treated fairly in recruitment, training, promotion and the allocation of work.
- Not to be harassed or intimidated at work and in particular not to be harassed or intimidated because of your race, gender, religion or belief, disability, mental / civil partnership status, age, sexuality, gender re-assignment or pregnancy / maternity. (See [Valuing Diversity](#))

All ICPC employees are expected to make all reasonable efforts to deliver their role in accordance with the above. If you identify an issue in doing so then you should consult your line manager in the first instance and support can be provided. However, a persistent or significant failure to meet any aspect(s) of the code will be taken seriously and may lead to capability or disciplinary sanctions.

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Valuing diversity

The ICPC values and promotes equality, diversity and inclusion. This commitment is both as a service provider and employer. In line with the Equality Act 2010, in considering diversity and equality issues in our work, the ICPC considers the following 'protected characteristics':

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race (including ethnic or national origins, colour and nationality)
- religion or belief (including lack of belief)
- sex
- sexual orientation

The ICPC treat Welsh speakers as the tenth protected characteristic and affords them the same equality considerations as the other protected characteristics.

The ICPC is a learning organisation in which knowledge and learning are shared amongst colleagues and improvement becomes endemic. With this in mind it is clearly important that colleagues are free to explore and discuss issues around diversity and differences. Nothing in this code of conduct should be interpreted as seeking to prevent or constrain such discussion.

It is unacceptable however for employees to discriminate unlawfully – either in the decisions they make, or in putting pressure on another person to discriminate or in victimising someone who has raised an issue of potential discrimination in good faith and if you do so, you will face disciplinary action.

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Accountability

All staff are accountable to the ICPC Director General, who in turn is accountable to the Home Office, as the ICPC's sponsor department.

This relationship is set out in the [Framework Agreement](#).

The Home Secretary is the Minister responsible for the ICPC and is ultimately accountable to Parliament for the ICPC's effectiveness and efficiency.

As a member of ICPC staff you are expected to:

- Conduct yourself without bias and with integrity, objectivity and honesty. You should not deceive or knowingly mislead others, including other staff, Board members, the sponsor department, Ministers, Parliament or the public.
- Deal with the affairs of the public sympathetically, efficiently, promptly and without bias or maladministration. You should always aim to offer the public the highest standards of conduct and service.
- Ensure that the ICPC's resources are used in the most economical, efficient and effective manner as befits public money.

ICPC policy and procedures

The code of conduct is complemented by a suite of ICPC policies and procedures that provide more detailed guidance and direction regarding specific aspects of your role and how you are expected to deliver your duties.

Where appropriate you will find references within the code to relevant policy and the full library of ICPC policies is available via the ICPC intranet.

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Integrity

Conflicts of interest

The ICPC has a stand-alone [conflicts of interest policy](#) that provides guidance in identifying and reporting potential conflicts of interest. It also details the types of private interest that should be declared on joining the ICPC. You should refer to the full policy but Cabinet Office guidance suggests:

In general, all financial interests should be declared. When considering what non-financial interests should be declared, you should ask yourself whether a member of the public, acting reasonably, would consider that the interest in question might influence your words, actions or decisions.

Gifts and hospitality

As an ICPC employee you should not use your official position to receive benefits of any kind from a third party, which might reasonably be seen to compromise your personal judgement and integrity.

Gifts

You must not accept or give any gifts in connection with your official duties. The only permissible exception is where the refusal to accept a gift is judged to cause unnecessary offence.

Any gift that is accepted must be declared, irrespective of perceived value. A [declaration form](#) should be completed via MyICPC and it will be your responsibility to submit the gift to a charity, submitting a receipt to the Governance Secretary to confirm that you have done so. Alternatively, as the gift recipient, you may retain the gift and make a donation to one of the ICPC's charities, equivalent to the approximate value of the gift as determined by the Director General's office.

Where the gift is not appropriate to give to charity, the Director General's office will advise on what should be done with it.

In the event that you suspect a gift has been offered with the expectation of influencing you, this must be immediately reported to your line manager (see [Bribery Act](#)).

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Hospitality

You may accept conventional hospitality provided it is normal and reasonable in the circumstances, for example:

- Tea, coffee, biscuits and sandwiches at meetings.
- A working lunch in the course of normal business provided this is not lavish. Nil: please see [consumption of alcohol during working hours](#)

Apart from the conventional hospitality outlined above, all other invitations or hospitality should be declared to the Director General's office prior to responding. All hospitality received must be in relation to delivering your duties as an employee of the IOPC and you should apply the test as to whether a reasonable member of the public would consider it appropriate for you to accept. This may include invitations to an annual dinner or conference of an organisation with which the IOPC has regular contact. Offers made by stakeholders and service providers to attend purely social, artistic or sporting functions must be declined and returned to sender. Advice can be sought from your line manager or the Director General's office.

In line with the Business Expenditure policy, employees should not expect the IOPC to pay for the meals or drinks of stakeholders and service providers unless they have permission from their line manager to do so. Any hospitality provided should be in line with IOPC's Business Expenditure Policy.

All declarations of hospitality are placed on a register which is reviewed on a 6 monthly basis by the Director General and made available via the IOPC website. Guidance for employees and managers on registering gifts or hospitality is available [here](#).

Bribery Act

On 1 July 2011 the Bribery Act 2010 came into effect. The Act broadly defines bribery as giving a financial or other advantage to encourage a person to perform their functions or activities improperly or to reward a person for already having done so.

While bribery has long been a criminal offence, the Act takes a robust approach, establishing new criminal offences of which two are of specific relevance to you as a member of staff:

- Active bribery- bribing a person to induce or reward them to perform a relevant function or activity improperly
- Passive bribery- requesting, accepting or receiving a bribe as a reward for performing a relevant function or activity improperly

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members of the European Parliament (MEP) and local councillors should be referred to the Parliamentary Officer within the Strategy and Impact Directorate.

Parliamentary questions in particular often require a quick turnaround and should be forwarded to the Parliamentary Officer immediately. Further guidance on interacting with Parliamentarians is provided within the Operations Manual.

Outside of work

As a member of the IOPC you are expected to conduct your professional life in line with the IOPC's values, this code and IOPC policies and the expectation is that this should not encroach on your private life, subject to the following guidance regarding off-duty time:

You must not bring the IOPC into disrepute, by doing or saying things that will reflect badly on the IOPC. In their spare time, staff should not engage in activities organised by groups or organisations which could be seen as related to IOPC without the prior agreement of their line manager. It is important that you seek advice from your line manager or the People Management & Wellbeing Team in advance of taking part in any event which may fall into this category. If this approach is not followed, you may be subject to a management investigation in accordance with the IOPC's Disciplinary Procedures.

You must also tell your line manager as soon as practicable if you inadvertently find yourself in a situation outside work which you had not anticipated and which you believe could negatively impact on the public confidence in the IOPC.

You must not knowingly put yourself in a position where your private interests conflict with the IOPC's and any conflict of interest must be resolved in the IOPC's favour. For example, you should not knowingly attend a social event, at which an individual currently under IOPC investigation is present, if by doing so you could be perceived by a reasonable member of the public as being open to personal influence in the way in which you do your job. If you do inadvertently attend such an event and find yourself in this situation, you must report it to your line manager.

Social media

Expectations in relation to your conduct as a member of IOPC staff apply equally to use of social media and online activity as they would do in any other social context. You must not refer to any IOPC related matters in these forums unless you have been authorised to do so i.e. as a member of the Press Team (in which case personal and professional accounts should be kept strictly separate).

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Definitions

A **relevant function** is defined as a function which should be carried out in either good faith, impartially or that the person performing it is in a position of trust.

Improper performance would be a failure to perform a function in line with an expectation of "good faith", "impartiality" or "trust". The test for whether performance is improper is what a reasonable person in the UK would expect.

Any incident of bribery will be dealt with as a serious disciplinary matter, which, if proven, is likely to result in dismissal as well as being a criminal offence. The maximum penalty for an offence of bribery by an individual is 10 years imprisonment and/or an unlimited fine. You should familiarise yourself with the IOPC's [corporate fraud, bribery and corruption strategy](#).

If you are offered a bribe, this must be reported immediately to your line manager. If you have any suspicion that another IOPC employee is involved in bribery you should consult your line manager or the [Fraud, Bribery and Corruption Policy](#) as appropriate.

Representing the IOPC externally

As an IOPC employee, when writing or speaking publicly (either in a formal speech or informally at a meeting) on any matter which could be seen as falling within the remit of the IOPC, you are likely to be seen as representing the IOPC or the IOPC's position on an issue. This may well be the case even when you may believe you are writing or speaking as an individual.

Speeches, presentation or articles, which relate to IOPC work, should be cleared in advance with your Director. See also [Outside of Work](#).

Contact with the media

All media enquiries should be directed to the Communications Team in the first instance. You should not make direct contact with the media or respond to media enquiries unless it has been agreed in advance that you should do so.

Contact with Parliamentarians

Any contact through your role from Parliamentarians including members of the House of Commons (MP), members of the House of Lords, Welsh Assembly Members (AM),

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You are advised to exercise due care in sharing any personal details online and identifying yourself as a member of IOPC staff outside of professional or business related forums.

Other employment

You are expected to be fully committed to the work of the IOPC and are therefore required to seek permission before starting any employment elsewhere. Permission will not be unreasonably withheld but due consideration must be given to whether:

- There is a potential impact on your performance within your IOPC role
- There are implications for the provisions of the Working Time Regulations
- There is any potential conflict of interest with your job at the IOPC. Conflicts may arise, for example, if the other employer comes under the remit of the IOPC's powers or is seeking a contract for goods or services with the IOPC.

You are advised to consult your line manager at the earliest available opportunity and any additional employment should be reported in your register of interest return.

Political activities

This section is concerned with party political activity liable to give public expression to political views rather than with privately held beliefs and opinions. It is not intended that these restrictions affect trade union membership or activities.

The IOPC is independent from Government, the police and pressure groups. Public confidence might be affected if it was believed that an individual member of staff's personal political views were compromising its independence and impartiality or influencing its decision making.

Employees, whether in politically restricted posts or not, may be members of a political party (and need not declare it). If you are not in a politically restricted post you may participate in political activities such as helping with administration at the time of a general election or delivering leaflets provided that you are conscious of the standards of behaviour expected of you as set out in this code and ensure a proper discretion, particularly in regard to the work of the IOPC. On matters directly affecting the IOPC, you should not make political speeches or engage in other political activities.

If you wish to run for office, you must seek advice at an early stage from your director and you may be required to take a leave of absence to do so.

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	Politically Restricted Posts All posts at or above grade 15 are politically restricted. This covers the Deputy Directors General, Directors and Heads of Function. Other posts below grade 15 are also considered politically restricted if: - They act as "spokesperson" for the Director General or have a significant degree of face-to-face contact with stakeholders, pressure groups, or other bodies or individuals who are seeking to influence the IOPC. - It would appear to the public that the post holder had some influence over the outcome of the Director General's decisions. Senior Lawyers and posts within the Media and Digital Communications Teams and Policy and Engagement Team are considered politically restricted. If a post is politically restricted this means that you should discuss with your line manager before taking on any political activities. Permissions will not be unreasonably withheld but consideration will need to be given to the scope and remit of the role and how this may be perceived in the context of your IOPC position. You should discuss with your line manager if you are considering becoming politically active, for example: - Campaigning for a political party. - Holding a political office. - Occupying party political posts. - Holding a particularly sensitive or high profile unpaid role in a political party. If you are in a politically restricted post and another person resident at the same address as you is politically active, you need to ensure that your own political impartiality is not compromised and should seek advice if necessary from your line manager in such circumstances. Police and Crime Commissioner (PCC) Elections In addition to the above, no staff may be permitted to provide support for the election for a PCC. This includes campaigning for the PCC or providing support for the election process such as counting votes or administering at election stations. Breaches of the Code of Conduct The code of conduct and IOPC policies provide the standard against which all staff behaviour should be measured. Any breaches of the code will be subject to investigation and serious breaches may lead to disciplinary proceedings. Conflict at work The IOPC has a range of support tools and processes in place for members of staff who feel they have been the victim of bullying or harassment at work to support and enable them to appropriately raise and challenge this behaviour. If you feel you have been a victim of such behaviour, the Conflict and Dispute Resolution Policy details how to raise such issues. Further support and guidance can be sought from line managers, trade union representatives, Staff Council Representatives and the Employee Assistance Programme (EAP). Where a complaint is made between members of staff, the IOPC uses a conflict and disagreement resolution process, with an emphasis placed on achieving a mutual resolution as opposed to apportioning blame. The first stage of any such process is to attempt to resolve the process swiftly and amicably through informal action. Unacceptable behaviour can only be addressed when the victim or witnesses make a complaint. Action cannot be taken against unconfirmed or anonymous allegations. Further details on the available support and relevant processes can be found on the Hub. Employee involvement and management direction Employee involvement in discussion and debate is a healthy part of the IOPC, achieving robust decision making and planning, although the final decision must rest with the accountable manager(s). You can refer to the IOPC's agreed Scheme of Delegation for further details of who holds specific delegated authorities. You are expected to follow management direction where it has been given. Where you do not agree with or understand why a decision has been taken, in the first instance you should ask the accountable manager for an explanation. Should this not resolve the matter and you still feel that the management direction is unreasonable you should consult the Conflict Resolution and Grievance Policy for further guidance. Use of alcohol or illegal drugs In keeping with the expectation that IOPC staff always act professionally, you cannot drink alcohol during your working hours (including during meal breaks). This includes times at which you are on-call or representing the IOPC externally. The only exception to this rule would be where director approval has been sought ahead of attending a work related function. If you are not on call, but have consumed alcohol and are then contacted to undertake IOPC work, you should make the instructing manager aware of the circumstances. If you are at work under the influence of alcohol or illegal drugs, then that will be regarded as a serious disciplinary matter. If you are prescribed drugs which may affect your ability to do your job, then you should advise your line manager. Raising concerns In the event that you have a significant concern about an IOPC related matter that you feel unable to raise with your line manager, please refer to the IOPC Raising Concerns Policy for further information relating to this. Published Feb 2025 © IOPC 2025 OGL This is licensed under the Open Government Licence v3.0 except where otherwise stated. This does not include material belonging to third parties. Authorisation to use such material must be obtained from the copyright holders concerned.
Ref 5025764 Back to top	<u>Investigation report relating to Operation Gullane</u>
<u>Request</u>	<i>As the successor organisation to the Independent Police Complaints Commission are you able to provide a copy of the full report into Operation GULLANE?</i>
<u>Response</u>	The information we have published about this case can be found on the National Archives website here: [ARCHIVED CONTENT]