

Joint Audit Committee

31 July 2025

| Responsible Officer: | Impact on Business: | | Risk Register Reference & RAG |
|--|---------------------|---|-------------------------------|
| Jack Hudson Chief Executive | High | | |
| | Medium | X | |
| | Low | | |
| Lead Manager: | Report Type: | | |
| Heather Sheldon Head of Governance & Compliance | Governance | X | |
| | Strategic | | |
| | Operational | | |
| Previous papers to Committee: | | | |
| Integrity Assurance Report 23 July 2024 | | | |

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| Report summary | The purpose of this paper is to provide a comprehensive update on the work progressed since the 2024 Integrity Report, outlining the various mechanisms and governance structures the Commissioner has in place to ensure ethical standards and integrity are upheld within Cambridgeshire Constabulary. This report specifically focuses on how the Commissioner exercises oversight and holds the Chief Constable accountable for the ethical conduct of the Constabulary. |
| Related Police and Crime Plan objective | Building Trust and Confidence |

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|--------------------------------------|--------------------------------------|---|-----------------------------------|-----------------------------------|
| Action (tick one box only) | Information <input type="checkbox"/> | Assurance <input checked="" type="checkbox"/> | Approval <input type="checkbox"/> | Decision <input type="checkbox"/> |
| Recommendation | The Committee to note the report. | | | |

1. Background and Legislation

- 1.1 The national policing model is based on public co-operation. Public confidence in policing depends on officers and staff behaving in a manner that maintains public support. Through the “Building Trust and Confidence” theme of the Plan the Commissioner has outlined the importance of, and his commitment to, holding the Chief Constable to account for ensuring that all members of the Constabulary conduct themselves in accordance with the standards of professional behaviour expected within policing.
- 1.2 The Commissioner has made it clear that, where standards fall short of expectations, or where improvements are required, the Chief Constable has established processes in place to ensure complaints are managed fairly, outcomes are reasonable, and lessons are learned for future improvements.
- 1.3 The Plan builds upon the Commissioner’s previous plan to ensure that the police act with integrity and social responsibility, promoting a culture that is inclusive, diverse and committed to equality – from public engagement to environmental sustainability. The Commissioner will continue to ensure that robust governance arrangements are in place, enabling effective oversight and assurance on deliverables.
- 1.4 The following sections outline the mechanisms that are currently in place and provide an update relative to the baseline that was reported on in July 2024.

2. CONSTABULARY HOSTED CONTROLS ASSURANCE

2.1 Bedfordshire, Cambridgeshire and Hertfordshire (BCH) Professional Standards Department (PSD) Strategic Scrutiny Panel

- 2.1.1. The BCH PSD Strategic Scrutiny Panel continues to operate under the new name which was changed in 2024. The terms of reference were reviewed in early 2025 with minor changes made. The Panel is held quarterly, with the

option to increase frequency if significant concerns arise regarding any relevant subject matter. The Head of Governance and Compliance attends this meeting on behalf of the Commissioner. The outcomes, recommendations, and observations from it inform the strategic direction of PSD and they are incorporated within BCH PSD's delivery planning or policy and procedure as appropriate.

2.1.2. The primary functions of this panel are:

- To hold the Head of PSD to account for their delivery, and to use their collective expertise to provide feedback on PSD work, identify learning, and exploit opportunities to jointly resolve identified issues.
- This will be achieved through the effective scrutiny of:
 - Outcomes of and learning from tactical scrutiny panel reviews,
 - Themes in data reporting (inclusive of but not limited to: overall performance, Violence Against Women and Girls (VAWG), discrimination, disproportionality of conduct and vetting decision making, pension forfeiture, organisational and individual learning),
 - PSD strategic and delivery planning, including response to national and local issues,
 - Horizon scanning and His Majesty's Inspectorate of Constabulary. Fire and Rescue Service (HMICFRS) readiness,
 - New or updated policies and procedures.

2.2 **BCH PSD Tactical Scrutiny Panel**

2.2.1. The Primary functions of this panel are:

- Retrospectively checking and challenging BCH PSD decision making in relation to: Discrimination and disproportionality – conduct and public complaints, VAWG and Vetting.
- Membership comprises of PSD representatives, internal and external community representatives, Police Race Action Plan (PRAP) and VAWG tactical leads, force ethics leads and internal support and advisory networks.

- Outcomes, recommendations, and observations from this panel will be shared with the BCH PSD Strategic Scrutiny Panel for further consideration and strategic direction.
- This panel is held bi-monthly

2.2.2. The Office of the Police and Crime Commissioner (OPCC) has a relevant policy area representative in attendance at each of the tactical panels. Their role is to provide assurance to the Commissioner that effective scrutiny is taking place and to inform the Head of Governance and Compliance of any upcoming themes to be considered by the Strategic Scrutiny Panel.

2.2.3. The Commissioner is satisfied that the panel continues to provide an enhanced level of scrutiny on ethical decisions and strategic planning as a result of scrutiny feedback.

2.2.4. The topics discussed include equality and diversity, as well as the national PRAP. These are steered by the Code of Ethics and ethical issues are therefore considered.

2.3 **Hate Crime Scrutiny Panel**

2.3.1. The Constabulary launched a new Hate Crime Scrutiny Panel in 2024, which met twice during 2024/25. Going forward the aim is to meet at least three times per year. This panel has membership from people who are representative of those, or who themselves, have lived experiences of hate crime. At each session a selection of hate crimes that have reached a conclusion, and which includes the outcome of no further action, are scrutinised. The selection per session includes a range of hate crimes including race, disability, religion, sexuality/gender (LGBTQ+ community).

2.3.2. The OPCC are appraised of the outcome of these meetings. This provides further assurance to the Commissioner that the scrutiny of hate crime is being carried out with a key focus on ethics and ethical decision making.

2.3.3. The sessions continue to generate organisational learning and change ideas. Membership at the Hate Crime Scrutiny Panel is distinct from the other scrutiny panels and includes specific representatives from seldom heard communities who provide direct feedback.

2.4 **Bedfordshire, Cambridgeshire and Hertfordshire Equality, Diversity and Inclusion Board (BCH EDIB)**

2.4.1. This board provides strategic vision and coordination to ensure BCH supports the National Police Chiefs Council (NPCC) Policing Vision 2025¹. The Senior Partnership Policy Officer from the OPCC is a member on this board for assurance that the force is committed to achieving this. These meetings are held bi-monthly and are chaired by the Deputy Chief Constable (DCC) for Bedfordshire. The work is supported by a designated BCH Inclusion Co-ordinator. There is regular attendance at these meetings by BCH stakeholders and force Ethics, Diversity, Equality, and Inclusion (EDEI) strategic leads. Updates are provided in relation to ongoing and proposed activity including positive action which is managed through the local force EDEI Strategic Group meetings.

2.4.2. Ethics points which arise or are discussed at the BCH EDIB are sufficiently considered and agreed decisions and actions are circulated to members for consideration. Force EDEI leads discuss such items. Through the Senior Partnership Policy Officer attending this meeting, the Commissioner is assured that actions are completed and responded to.

2.5 **Ethics Diversity Equality and Inclusion Strategic Group (Cambs)**

2.5.1. This is a Constabulary specific strategic meeting that ensures the Force acts in accordance with its statutory duties under the Equality Act 2010 to eliminate unlawful discrimination, advance equality of opportunity, and foster good relations. The purpose of this meeting to promote the highest standards of conduct to help create an inclusive working environment through EDEI activity in line with the Code of Ethics, and to provide

¹[policing-vision-2025.pdf](#)

governance and oversight, reinforcing the core Constabulary Values of Fairness, Integrity, Diligence and Impartiality. The meeting is chaired by the Head of People and Professionalism and the Force Strategic EDEI Lead, with upward reporting to Cambridgeshire DCC as Chief Officer Lead. The group meets bi-monthly, and work is supported by a designated Force Inclusion Co-ordinator. The Senior Partnership Policy Officer is a member of this group. This group reports into BCH EDIB and the Commissioner's Business Co-ordination Board in respect of the Constabulary's duties under the Equality Act.

2.5.2. The Commissioner remains assured that the Constabulary is satisfied that ethics are scrutinised at this meeting as they are considered when discussing agenda items, including national drivers such the national Police Race Action Plan, the Macpherson Report, and the Baroness Casey Report. BCH initiatives such as anti-racism training, ethics panels, force culture activity, positive action, equality, and staff network updates among others. In addition, this group informs EDEI tactical group activity which also considers and actions ethical issues that arise at the strategic level, as well as dealing with matters for escalation and requiring sign-off at a strategic level. All Constabulary business areas are in attendance; this includes staff associations, support group leads and the force Ethics & Legitimacy Co-ordinator with representation at both the strategic and tactical meetings, offering assurance as to the consistency of ethics considered and managed between both EDEI meetings.

2.6 **Race and Inclusion Board (Cambs)**

2.6.1. Cambridgeshire Constabulary's Race and Inclusion Board (RIB) is a decision-making board. It is informed by local Neighbourhood Policing Boards, EDEI Board, Force Performance Board (FPB), Criminal Justice Board (CJB) and reports up to the Force Executive Board (FEB) and Business Co-ordination Board (BCB).

2.6.2. Formal communication between this subgroup and FEB is by way of Bi-monthly meetings providing national and local updates including delivery

against the local PRAP. The Chief Constable chairs this Board. Their purpose is to maintain and oversee the force response to the four workstreams of the national PRAP. Each pillar has a designated Chief Superintendent lead who is responsible for delivery against the plan.

2.6.3. The Board is attended by the DCC who as Chief Officer EDEI lead, acts in an advisory capacity to the Chief Constable. Attendees include Assistant Chief Constable's (ACC's), Chief Superintendent workstream leads and other business leads, such as Corporate Communications and PSD. This level of corporate governance is considered essential by the Constabulary to provide assurance that the longstanding challenges around the lower levels of trust and confidence in Black communities are being addressed and managed appropriately: similarly, that issues are identified, reviewed, and managed effectively, and that opportunities are recognised and maximised in line with the national plan.

2.6.4. Key activity updates from RIB are reported into BCH Equality, Diversity and Inclusion Board for information only, chaired by Bedfordshire DCC.

2.6.5. The role of the RIB is to maintain and oversee the force response to the NPCC Race Action Plan under the four workstreams detailed below.

2.6.6. **Workstream 1: Culture and Workforce**

Develop officers' and staff members' understanding of Black history and the relationship between policing and Black communities. This will be mandatory and role- or rank-specific for all staff. It will challenge assumptions and bias. This will also be used to assist with developing a shared local and mutual understanding with Black communities.

2.6.7. **Workstream 2: Powers & Procedure**

Adopt an agreed national approach for the recording, analysis, supervision and scrutiny of police powers (Section 163 of the Road Traffic Act 1988, Section 60 of the Criminal Justice and Public Order Act 1994, use of Taser,

use of force), to identify and take actions to eliminate racial disparities at force and individual levels.

2.6.8. **Workstream 3: Trust & Reconciliation**

Develop a national approach to improve engagement in policing activity and governance. Work with Black people and external partners to design engagement methods that ensure Black voices are heard and can influence policing. This will involve engagement with, and learning from, other non-policing organisations.

2.6.9. **Workstream 4: Safety & Victimisation**

Undertake analysis to identify which crime types have the most disproportional impact on Black people and the service level that Black victims receive. This analysis will form the basis of ensuring equality of service.

2.6.10. RIB maintains strategic ownership for policing activity around the four workstreams outlined above.

2.7 **Ethics Panels**

2.7.1. The Constabulary facilitate one internal and one external Ethics Panel four times per year. Both are currently chaired by a Chief Inspector within the People and Professionalism Department. The purpose of these panels are to address questions or dilemmas that have been raised within the workplace where supervisors, officers and staff may not know the appropriate outcome and/or there is no defined policy or procedure in such a case. Discretion may have already been applied in the specific incidents raised, however a referral of the 'dilemma' to the Ethics Panels may support the decision making, assist others in the future and/or identify the need for a policy to be created.

2.7.2. All items raised are documented in the accessible online Ethics Library (held in SharePoint), for all within the force to access if necessary. By hosting external panels for members of the public, this allows the Constabulary to

seek the views of volunteer members from local communities on the same dilemmas, enabling the Constabulary to consider different perspectives before any final learning is identified or new policies/guidance created. The Senior Policy Officer from the OPCC attends the external panel for information and assurance on the scrutiny of ethical decision making within policing. This provides additional assurance to the Commissioner that Ethics are being scrutinised.

2.8 Complaint Review Team

2.8.1. The Complaint Review Team (CRT) managed within the People and Professionalism Department of the Constabulary provides quarterly updates to the FEB and subsequent updates to the Commissioner's BCB. The report advises around emerging patterns and trends within complaints and identifies opportunities for learning and improvement on an individual, team and Constabulary wide basis which would include ethical issues if identified. Through onward reporting to BCB, the Commissioner continues to scrutinise performance and hold the Chief Constable to account.

2.8.2. The Commissioner is also the Appropriate Authority for the initial handling of certain complaints and is the Relevant Review Body for handling certain Complaint Reviews (See Section 6).

2.9 Business Assurance Meeting

2.9.1. The purpose of this meeting is to discuss actions and recommendations from HMICFRS reports. OPCC staff attend this and provide oversight and assurance to the Commissioner, that the recommendations made by HMICFRS are being considered and progressed and to monitor and ensure progress is made against all HMICFRS Areas for Improvement (AFI), recommendations and key findings.

2.9.2. To monitor progress against actions arising from the Risk Assurance Services (RSM) non-financial internal audits.

2.9.3. To monitor and track progress of all actions arising from the Constabulary Strategic Threat and Risk Assessment (CamSTRA) process.

2.9.4. To report on horizon scanning, proposed inspection work, notable practice and innovation to seek to improve practices within the Constabulary to ensure the force continues to innovate and develop work to protect and serve the public.

2.10 **Youth Justice Management Board**

2.10.1. The Constabulary have nominated strategic and tactical stop and search leads to ensure performance and scrutiny is maintained in an effective, fair, proportionate, and transparent manner. This is supported by an independent community stop search scrutiny group.

2.10.2. A Young Persons in Custody Review Meeting is held on a quarterly basis between the Constabulary and senior leaders within the Youth Offending Service to review each case in detail.

2.10.3. Data on strip search involving children/young people and overnight custody of children/young people is reported on to this Board. A quarterly update detailing stop/strip search data in relation to under 18s conducted by the Constabulary together with any cases of a child/young person being kept overnight in police custody is taken to the Cambridgeshire and Peterborough Youth Justice Management Boards. Here it is reviewed by relevant partner agencies to ensure the appropriate use of police powers. The OPCC have a senior member of the team attend this Board.

2.11 **Trust Confidence and Legitimacy SME Meeting**

2.11.1. The primary purpose of the Trust Confidence & Legitimacy SME's meeting is to oversee the strategic direction from the Chief Constable to seek to improve the trust confidence and legitimacy of Cambridgeshire Constabulary both internally and externally and in so doing properly embed the culture statement and values.

2.11.2. The meeting is positioned at a tactical level and will allow the strategic lead to track progress as evidenced in the data gathered by a number of workstreams that report into the meeting. This meeting then feeds into the Force Performance Board on a quarterly basis.

2.11.3. Key items that are discussed at this meeting include:

- Casey review
- Culture statement
- Number of fairness at work cases
- Number of complaints
- Number of misconduct cases
- Race Action Plan
- Diversity data
- HMICFRS reports
- Stop & search data

2.11.4. By participating in this meeting, the OPCC contributes to the improvement of trust, confidence and legitimacy in Cambridgeshire Constabulary and provides the Commissioner with assurance that the Constabulary are addressing key issues that can have an impact on this important agenda.

2.12 Integrity Health Check and Vetting Review

2.12.1. The annual Integrity Health Check (IHC) and Vetting Review (VR) processes are referenced within the National Vetting Authorised Professional Practice as an integral part of the wider protective security regime, which allows police personnel to maintain their police vetting clearance. It is intended to act as a reminder for managers and employees of areas which create risk and vulnerability. The checks can safeguard and protect both the individual and the organisation from the risk of exploitation.

2.12.2. Managers regularly undertake IHCs and these can be undertaken at any point throughout the year with their staff rather than just at the end of the year. In addition, the IHC and VR is be completed with anyone that has moved units or had a substantial change of circumstances.

2.12.3. Compliance is mandatory across the entire Constabulary and is reported upon.

3. OPCC HOSTED CONTROLS ASSURANCE

3.1 Complaints and Reviews

3.1.1. The Commissioner has a statutory duty to hold the Chief Constable to account for the handling of complaints and to oversee Cambridgeshire Constabulary's complaints system.

3.1.2. The CRT initially handle complaints against officers and staff who work for the Constabulary, as well as complaints about the service provided by the Constabulary as a whole. It is recognised that sometimes CRT may be unable to resolve expressions of dissatisfaction. This may result in PSD recording the matter as a complaint. This is handled by PSD and upon finalisation, the complainant receives a letter outlining the outcome. The outcome letter also outlines how they can have the handling of their complaint reviewed by the relevant review body. Generally, this request must be made to the relevant review body within 28 days. For most complaints managed by the Constabulary, the relevant review body is the Commissioner.

3.1.3. A review focuses on the handling of the complaint. The review considers whether the outcome of the handling of the complaint was reasonable and proportionate. It is not a reinvestigation of the original incident that led to the complaint. Where it is found that the outcome of the complaint is not

reasonable and proportionate, the OPCC will uphold the review and may make certain recommendations to the Chief Constable.

3.1.4. Until April 2024, reviews were undertaken by the Reviews Officer of the OPCC and quality assured by a member of the OPCC's Senior Management Team (SMT) before finalisation. Since the last update that was presented to the Police and Crime Panel, this function has been outsourced to an independent service provider, Sancus Operations. This was necessary to meet the increasing demand on the OPCC, to improve timeliness and increase customer satisfaction. The OPCC retains overall responsibility for this, they remain the single point of contact for complainants and continue to complete a thorough quality assurance process for all completed complaint reviews.

3.1.5. During 2024/25 Sancus completed 33 reviews with one later being considered an invalid review request (correct as of 1 April 2025). During the last quarter (January-March 2025) Sancus completed 15 reviews, with the average time taken to complete a review being 10 days. Over the last 6 months (October-March), Sancus completed a total of 23 reviews, with the average time taken to complete a review being 10 days. This exceeds the originally agreed expectation that Sancus will complete reviews within 21 days.

3.1.6. Once finalised, the complainant is informed of the outcome and if the complainant is still dissatisfied with the outcome, they have the option of proceeding through the judicial review process.

3.1.7. Between 1 April 2024 and 31 March 2025, details relating to complaint review requests received are as follows.

Total number of complaint review requests received: 42

Number of valid requests: 35

Number of invalid requests: 7

- Outside of review period: 1
- Incorrect Relevant Review Body: 6

Number of requests not progressed due to withdrawal from review process or no response from complainant (unable to confirm review request): 2

Number of complaint reviews upheld: 7

3.2 Complaints Dip-Sampling

- 3.2.1. On a quarterly basis, the OPCC request a theme for complaints from PSD and all complaints fitting that theme are made available to be dip-sampled. This gives the Commissioner additional assurance that complaints against the Constabulary are being handled reasonably and proportionately and provides an opportunity for the OPCC to raise any issues they identify within the complaints directly with PSD for addressing.

3.3 Complaints against the Chief Constable

- 3.3.1. The Commissioner is the appropriate authority for handling complaints against the Chief Constable. More serious complaints are referred to the Independent Office for Police Conduct (IOPC) for investigation. The threshold for referring such complaints is set out in IOPC Statutory guidance on the police complaints system 2020.
- 3.3.2. Following receipt of a complaint against the Chief Constable the OPCC will assess whether the complaint falls within the scope of the Policing and Crime Act 2017 and the complainant's eligibility to make a complaint. Also, whether the matter relates to conduct and / or death or serious injury and whether the complaint should be recorded. Local Policing Bodies (the OPCC) are the appropriate authority only when a complaint is about the conduct of a Chief Constable. If the complaint relates to decisions in general or about decisions delegated by the Chief Constable these matters will be

referred to the CRT for them to resolve or, if not resolved, forwarded to PSD to be dealt with as a local complaint.

3.3.3. Complaints are dealt with in accordance with the statutory guidance. In certain circumstances the OPCC will, when required, refer the matter to the IOPC for independent consideration. The OPCC will inform the complainant of their decision whether to record the complaint or not and the reasons behind the decision. The complainant will be informed in writing of any outcome as well as any right of appeal.

3.3.4. Between 1 April 2024 and 31 March 2025, details relating to complaints received against the Chief Constable of Cambridgeshire Constabulary are as follows.

Total number of complaints received: 3

Number of complaints which met criteria for Chief Constable

Complaint: 1

Number of complaints that did not meet criteria for CC complaint): 2

Number of complaint outcomes appealed to IOPC: 0

3.4 **Complaints against the Commissioner**

3.4.1. The Police and Crime Panel has responsibility for handling complaints against the Commissioner and where appointed the Deputy Police and Crime Commissioner. Details of the complaints process are available on the Commissioner's Website.

3.4.2. Between 1 April 2024 and 31 March 2025, no complaints have been recorded by the Panel against the Commissioner.

3.5 **Independent Custody Visitors**

- 3.5.1. Independent Custody Visitors (ICVs) are volunteers who represent the local community and conduct unannounced visits to police custody suites. Their primary purpose is to independently assess the treatment of detainees, the conditions of their detention, and ensure that their rights and entitlements are upheld. Every Commissioner has a legal duty to run an Independent Custody Visiting scheme and appoints a scheme manager. Findings from ICV reports are used to effectively hold the Chief Constable to account, from frontline operations to senior management. We are currently looking to change from paper reporting to online to enhance efficiency.
- 3.5.2. The Constabulary currently operates two full time custody suites. Thorpe Wood in Peterborough which has 26 cells, and Parkside in Cambridge which has 12 cells. Following the permanent closure of Huntingdon and March Custody facilities the Constabulary now also utilises King's Lynn Police Investigation Centre (PIC) as part of efforts to enhance operational efficiency and maintain high standards of detainee care.
- 3.5.3. Through the work of ICVs, the Commissioner continues to give assurance to the public that people detained in the Cambridgeshire area are being treated in a lawful, ethical and transparent way. Ethical considerations are integral to ICV visits, and ICVs receive training to assess detainee treatment from an ethical policing perspective. ICV visits help to prevent ill-treatment and harm to detainees, and Custody Inspectors value the work of the ICVs in contributing to a safe environment and continuous improvement of custody.
- 3.5.4. The Commissioner recently shadowed an ICV visit and was reassured by the positive and constructive relationship between the ICVs and the Constabulary. This is particularly evident in the open access provided to ICVs by custody officers, who welcome visits at any time of day. Quarterly panel meetings are held with the lead Inspector for Custody (covering both North and South working areas), facilitated by the OPCC. Additionally, there is a biannual meeting involving senior OPCC staff and senior officers from the Constabulary, including the Custody Lead, enabling the OPCC to directly hold the force to account regarding actions taken in response to ICV

recommendations, including those relating to ethical concerns. Matters of concern may also be raised at any time throughout the year.

- 3.5.5. This multi-meeting approach, and the involvement of ICVs provides assurance to the Commissioner that ethics are sufficiently scrutinised. Staff from the OPCC attend and contribute to both regional and national meetings, assuring the Commissioner that the ICV scheme in Cambridgeshire are in line with all new policies and procedures.
- 3.5.6. In November 2023 the Scheme was recognised nationally for the excellent quality of its work and was presented with a gold quality assurance award by the Independent Custody Visiting Association (ICVA). We are currently working towards the next level of recognition, further ensuring that the Cambridgeshire Scheme operates at the highest standard.
- 3.5.7. The ICV scheme collects a range of data from visits, reporting back at panel meetings and to ICVA. While aggregate figures are recorded, the most valuable information is the detailed findings from visits, which continue to inform ICVs, the OPCC and the Constabulary, supporting the identification of best practice and process improvements where required.

3.6 **Community Scrutiny Panels**

- 3.6.1. The OPCC work with the Constabulary to facilitate Community Scrutiny Panels (CSP). They are independently chaired and membership on the panel includes volunteers who represent the communities of Cambridgeshire and Peterborough.
- 3.6.2. The panels are tasked with scrutinising police interactions with the public, specifically where officers have exercised Stop and Search and Use of Force and custody detention powers. The panel ensures that these powers are being exercised appropriately and ethically, with particular attention to interactions involving communities with historically lower levels of trust in policing.

- 3.6.3. Recommendations from the panels have resulted in tangible improvements within the Constabulary, from front line interactions to organisational and systematic changes. Examples of positive change include:
- Promoting diversity in Stop and Search training sessions.
 - Significant improvement in the quality of the grounds recorded for Stop and Search.
 - A cultural shift towards increased use of Body Worn Video.
- 3.6.4. Panel members have been trained to equip them with the relevant knowledge to effectively scrutinise incidents. This can include reviewing background information and custody records and the viewing of Body Worn Videos (BWV). The Constabulary are provided with a summary of each encounter scrutinised. Any learning identified is passed on to both individual officers and the Constabulary run Organisational Learning Group.
- 3.6.5. Attendance includes the Constabulary's Strategic Lead, as well as the Constabulary's Inclusion, Ethics and Legitimacy Co-ordinator along with representatives from the OPCC.
- 3.6.6. Between 1 April 2024 and 31 March 2025 the OPCC facilitated 12 Community Scrutiny Panel sessions and scrutinised Body Worn Video from 47 incidents involving Stop and Search, Use of Force and Custody.
- 3.6.7. The most recent HMICFRS PEEL² assessment of Cambridgeshire Constabulary (published on 12th March 2024) reported that 'Cambridgeshire Constabulary is outstanding at using police powers and treating people fairly and respectfully'. Cambridgeshire Constabulary continue to remain the only force in the country with this grading from HMICFRS.

² [Cambridgeshire PEEL Assessment 2023–2025 - His Majesty's Inspectorate of Constabulary and Fire & Rescue Services \(justiceinspectors.gov.uk\)](https://www.justiceinspectors.gov.uk)

- 3.6.8. As a result of this grading, the College of Policing undertook an Exploring Outstanding Practice study on Cambridge Police Stop and Search. In this report the OPCC feature for their role in scrutiny of Stop and Search. The panel has received recognition from both HMICFRS and the College of Policing for the impact this has on the Constabulary's ability to ensure such powers are used reasonably and proportionately.
- 3.6.9. In addition to the Community Scrutiny Panel, the OPCC runs Youth Scrutiny sessions in conjunction with the Constabulary. These sessions are run in the community at colleges, universities and youth groups throughout the county, helping to engage and connect with young people in the community.
- 3.6.10. Following the success of these sessions, the OPCC have now implemented roadshow style sessions within seldom heard from communities across the county, which will be carried out in the year ahead, ensuring that the full voice of Cambridgeshire and Peterborough is heard.

3.7 **Business Coordination Board**

- 3.7.1. This is the mechanism by which the Commissioner holds the Chief Constable to account for the efficiency and effectiveness of the Constabulary focussing on issues relating to strategy, governance and business. The agenda is managed by the Commissioner.
- 3.7.2. The Board takes a risk-based approach. Where necessary, additional meetings are scheduled to manage finance, risks and thematic issues.
- 3.7.3. Minutes of meetings, key papers and the terms of reference are published on the Commissioner's website.

3.8 **Gross Misconduct Hearings**

- 3.8.1. Following the government announcement of major reforms regarding the police disciplinary system, it was announced that the first set of legislative changes would come into effect on the 7 May 2024. These Regulations

amend the composition of misconduct panels, removing the role of Legally Qualified Chair (LQC) and assigning the responsibility of chairing hearings to Chief Officers.

- 3.8.2. The role of LQC has been replaced with Legally Qualified Persons/Advisors (LQP's). LQP's remain independent of the police in order to provide fair and impartial support to misconduct hearings chaired by a Chief Officer. Panels also include two Independent Panel Members (IPM's).
- 3.8.3. The OPCC is responsible for appointing and maintaining a list of LQP's and IPM's. This is managed in collaboration with Bedfordshire, Essex, Hertfordshire, Norfolk, Suffolk OPCC's and the Ministry of Defence Police, allowing LQP's and IPM's to serve across those areas.
- 3.8.4. When a case is referred to a misconduct hearing for a Cambridgeshire officer, PSD for BCH will contact the OPCC to request the appointment of an LQP and two IPM's. The OPCC liaise with Herts OPCC (who maintain control of the list on behalf of the seven areas), to request the next three names on the list, using a cab bank rota selection approach. It is then the responsibility of the OPCC to contact the individuals and appoint as necessary. PSD are then informed, enabling them to continue with the misconduct proceedings.
- 3.8.5. The Commissioner is provided with a decision notice to formally approve the appointment. In doing so, this ensures the Commissioner is fully informed on misconduct hearing numbers. This is a key area of business for the Commissioner and crucial in supporting the building trust and confidence pillar of the Police and Crime Plan, strengthening public confidence by ensuring police officers and staff act with integrity and are held responsible for their actions where standards fall below expectations.

3.9 **Pension Forfeiture**

- 3.9.1. The primary legislation for police pension forfeiture is found in Regulation K5 of the police pension regulations 1987.

- 3.9.2. These regulations permit forfeiture in cases where an officer is convicted of an offence committed in connection with their service that is certified by the Home Secretary as gravely injurious to the interests of the State or likely to lead to serious loss of confidence in the police service.
- 3.9.3. The process of pension forfeiture involves three stages:
1. The OPCC Chief Executive Officer (with delegated authority from the Commissioner) reviews the case and if appropriate, applies to the Home Secretary for a certificate of pension forfeiture.
 2. The Home Secretary issues a certificate of pension forfeiture if they deem appropriate.
 3. Upon receiving the certificate, the Commissioner determines whether to forfeit the pension and if so, the extent and duration of the forfeiture
- 3.9.4. Robust mechanisms are in place to ensure that the PSD bring to the attention of the OPCC, any case where an officer is convicted of a criminal offence.
- 3.9.5. In the last year, one application has been made to the Home Secretary for a pension forfeiture certificate. The OPCC are still awaiting an outcome of this application.

3.10 **Equality, Diversity and Inclusion (EDI) Working Group**

- 3.10.1. The EDI Task and Finish group have reviewed internal processes in relation to EDI. Through their research on the Equality Act and the PSED, delivery of team inputs on EDI good practice, and reviewing, updating and publishing OPCC team profile information related to the proportions of staff who are women, of an ethnic minority background, and have a disability, the group is assured that the OPCC is compliant with the duty.
- 3.10.2. The report, which includes the Constabulary assurances detailed in points 4.4 and 4.5, can be read in full here: [Equality, Diversity and Inclusion Report](#)

3.11 Internal Audit

3.11.1. RSM undertake reviews of Risk Management as part of the internal audit plan. This was last reported in October 2023 with reasonable assurance. The purpose of this is to provide an opinion of the effectiveness of risk management processes and to assess whether these have been embedded throughout both organisations.

3.11.2. The most recent RSM Internal Audit Progress Report (May 2025) reported on the following areas:

- BCH Innovation Framework – Minimal assurance.
- BCH Payroll & Expenses – Reasonable assurance.
- Follow Up – Reasonable progress has been made in implementing agreed management actions.

3.11.3. The Annual Internal Audit Opinion is due to be reported to the Joint Audit Committee (JAC) in July 2025.

4. External Control Assurance

4.1 Joint Audit Committee

4.1.1. The JAC undertakes the core functions of an audit committee in accordance with the guidance set out in the Chartered Institute of Public Finance and Accountancy publication. The JAC meets quarterly. They provide independent advice and assurance to the Commissioner and the Chief Constable.

4.1.2. The joint Annual Integrity Report 2024/25 is scheduled to report to JAC in July 2025. It provides a summary of the non-financial integrity arrangements, which the Commissioner and the Constabulary had in place during the reporting period. It includes the controls process, how the various controls

processes operated during the reporting period and evidence of their effectiveness. It also includes a complaints update.

- 4.1.3. The strategic risk register was presented to JAC in May 2025. JAC provided the critical eye, and their feedback has been considered and implemented. The Commissioner is assured that the JAC are providing a critical summary of performance around integrity and management of controls.

5. Supporting the use of new tools and technologies

- 5.1 **Commenced work to support the ethical and proportionate adoption of emerging technologies**—including facial recognition, biometrics, and artificial intelligence—intended to aid in the prevention and detection of crime, the delivery of justice, and the enhancement of public safety, while safeguarding public trust and confidence in policing.

- 5.2 **Initiated the development of oversight mechanisms** at both local and national levels to ensure the responsible use of new technologies in law enforcement, including early-stage planning for the ethical governance of biometrics (in the capacity as the Association of Police and Crime Commissioners national lead) and preliminary monitoring of AI and facial recognition systems to ensure necessity, proportionality, and fairness.

6. Taking a commissioning approach

- 9.1 The Commissioner is overseeing a £6.6m commissioning and grants portfolio. This is made up of national government grants and local funding pots. The team is managing 36 unique providers with multiple funding arrangements. In line with the [Commissioning and Grants Strategy](#), which was taken to the Police and Crime Panel in September 2024, a commissioning approach is taken to award all funding. This is underpinned by the four stages of the commissioning cycle: understand, plan, do and review.

9.2 In 2025-26 two specialist VAWG support services are being re-commissioned.

- **Countywide emotional and practical support for all adult (18 years and over) victims of police reported medium risk assessed domestic abuse** (currently being delivered by Peterborough Women's Aid as a pilot co-located in the Victim and Witness Hub)
- **Countywide emotional and practical support for all survivors of sexual violence** (currently being delivered by Cambridge and Peterborough Rape Crisis in a consortium arrangement – this includes our countywide ISVA service)

9.3 The OPCC is being supported by Seven Force (7F) Commercial Services to ensure these processes are open and transparent. The work starts off with the **understand phase** which will include:

- Quantitative review of all data for both crime types and of current support service provision data
- Qualitative review of existing victim/survivor feedback – and for Sexual Violence this includes **an innovative 'engage visually' art-based engagement** with a group of Cambridge-based survivors. The end project will be a visual representative of survivors' needs and their views of services they use.
- Stakeholder survey – which was released on June 30 seeking feedback on both services.
- Stakeholder Event (domestic abuse only) on June 27 to gather views.

9.4 The **plan** phase follows where the OPCC will be using all of information gathered to finalise service specifications – based on the available budget (which may change as a result of the Comprehensive Spending Review) and holding market engagement events. For Sexual Violence a 'Request for

Information' will 'test the market' and guide the future process. ward. For domestic abuse an open tender process will be held. Both services will be mobilised to start (or continue) on April 1, 2026.

10 Summary

- 10.1 The purpose of this paper is to provide a comprehensive update on the work progressed since the 2024 Integrity Report, outlining the various mechanisms and governance structures the Commissioner has in place to ensure ethical standards and integrity are upheld within Cambridgeshire Constabulary. This report specifically focuses on how the Commissioner exercises oversight and holds the Chief Constable accountable for the ethical conduct of the Constabulary.
- 10.2 The report reviews a wide range of interlinked assurance processes embedded within both the OPCC and the Constabulary. These include formal governance meetings, internal audit functions, performance monitoring and ethical decision-making frameworks. Each mechanism is examined within the context of its contribution to maintaining and promoting ethical policing and public trust.
- 10.3 Throughout the paper, it becomes evident that ethics and integrity are not treated as isolated themes but are instead embedded at every level of governance and operational delivery. The Commissioner receives regular and structured updates on areas such as professional standards, complaints handling and conduct investigations. In addition, broader cultural indicators and values-based leadership assessments are taken into consideration to form a holistic view of organisational integrity.

10.4 As a result of this continued scrutiny and systematic assurance approach, the Commissioner remains confident that ethics and integrity are being robustly monitored, evaluated, and reinforced. The findings of this paper reaffirm that ethical governance is firmly embedded across both the OPCC and the Constabulary, and that it continues to be a foundational element of how both organisations operate and are held to account.