



MINUTES OF A MEETING OF THE ETHICS AND TRANSPARENCY PANEL
25th June 14:00 – 16:00 HRS
Microsoft Teams Call
Shona Chapple, Executive Secretary – Minute Taker

Office of Police and Crime Commissioner

Mrs C Trewartha (Chief Executive)
Mr O Bryan (Deputy Police and Crime Commissioner)
Mrs N Chamund (Director of Governance and Performance)
Mrs C Hornbuckle (Assurance Officer)
Ms L Thomas (Administrator)

Office of Chief Constable

D/SUPT N Main
Mr M Gamble

Ethics and Transparency Panel Members

Ms Kathleen Harris Leighton
Dr Louise Bradley
Miss Lisa Vine
Ms Nikki Plant
Ms Katie Walker
Dr Frances Deepwell
Mr Matthew Youngs
Mr Kieran Breen
Mr Dennis Tanfa

1. Apologies

DCC M Kerr (Deputy Chief Constable)
Mr Kieran Breen

2. Declarations of Interest

None.

3. Minutes of meeting of the Ethics and Transparency Panel held June 2026 & Rolling Action Log

Item 4 in the minutes contains a typing error.

Update action 60 – The meeting with the Chair of JARAP was postponed. Kathleen has requested the OPCC to reschedule

Update action 55 - Due to OPCC roll changes, Vernon Scott was not asked to return and report on force performance and EDIC in this meeting. They will invite him to another meeting.

Kathleen reflects the action log has many open actions that may need to be reviewed.

Actions:

- Edit spelling of Kathleen's name
- Declutter action log

4. Urgent Business & Chair Updates

In the pre-meet, the panel noted 3 points that they will be elaborating on. These were as follows:

- a. Street wardens – they will discuss at the end of this meeting
- b. Grooming gangs – they will discuss in the next meeting and would like more in depth information.
- c. The ICV visits – these were very informative, but they would like to discuss some points in another meeting

5. Gifts and Gratuities

The Panel reviewed the Gifts and Gratuities Register and sought additional clarification on several entries. Members queried an entry relating to parking arrangements at Mansfield House and asked whether a discounted parking scheme existed between Mansfield House and the Euro Car Park, whether the arrangement was a one-off concession, and what financial value had been received. The Force advised that the arrangement may form part of a wider parking scheme available to officers within the City NPA area but agreed to verify the details and provide a response.

Members also expressed concern that entries recorded simply as being "over £75" did not provide sufficient detail to allow meaningful scrutiny. The Panel noted that the broad

value range made it difficult to assess proportionality and potential risks associated with gifts received. In addition, members questioned the requirement to record declined gifts and gratuities and requested further explanation of the rationale behind this practice. The Force agreed to review the recording requirements and provide clarification.

Discussion also focused on an entry relating to tea and coffee exceeding £75 in value. The Force explained that this related to support provided by a volunteer organisation involved in operational and training activity. Following clarification that part of the spreadsheet formatting had obscured details within the report bundle, members noted that the entry related to a gift provided as a gesture of thanks to officers for their assistance. The Panel concluded that additional narrative should be included for higher-value entries, particularly where gifts exceeded £50, to improve transparency and aid public understanding.

Actions

- Nicole Main to confirm whether a formal officer parking discount scheme exists between Mansfield House and the Euro Car Park and advise on its value.
- Nicole Main to clarify the rationale for recording declined gifts and gratuities within the register.
- Clare Hornbuckle to review the formatting of the Gifts and Gratuities spreadsheet to improve readability and transparency.

6. Emerging Issues

Paper A – Complaints Report

The Force advised that two dedicated teams manage approximately 99% of all Professional Standards Department (PSD) complaints. One team focuses on service recovery and resolving issues at the earliest opportunity, while the second team deals with more serious allegations. Between 1 April 2025 and 31 March 2026, the Force received between 3,500 and 4,000 expressions of dissatisfaction. This represents an 11% increase locally, compared with a national increase of 15%, placing Leicestershire broadly in line with national trends.

Members questioned whether matching the national average should be viewed as a positive performance indicator. The Force explained that its objective is not to see complaint numbers rise and that a range of interventions are in place to reduce dissatisfaction. However, it was noted that an increase in complaints is not always indicative of poorer performance, as higher complaint volumes can sometimes reflect greater public confidence in reporting concerns. The Force highlighted ongoing efforts to embed a culture of resolving issues at the first point of contact wherever possible.

The Panel sought further insight into the reasons behind the increase in complaints. The Force advised that it is difficult to identify a single cause, as a range of factors may influence complaint levels. These include changes in public confidence, the impact of high-profile cases, rising public expectations, resource pressures, and improved access to complaint reporting systems. The Force also noted that policing demand typically increases during and after the summer period, which can contribute to higher complaint volumes. More than half of complaints across Leicester, Leicestershire and Rutland relate to the investigative process, and there is a clear correlation between longer investigations and increased dissatisfaction. Improving investigation timeliness remains a key area of focus.

Members identified an error in the report, noting that the reporting period had been incorrectly recorded as April 2024 to March 2025 rather than April 2025 to March 2026.

The Panel also discussed fluctuations in allegation percentages and sought assurance regarding the measures being taken to improve performance. The Force outlined a number of initiatives, including the introduction of a Prevent Officer role working across conduct, vetting and complaints, ongoing reviews of investigative processes to improve timeliness, and plans to recruit an analyst to develop a performance dashboard. It was further explained that the complaints recording system allows individuals to withhold personal demographic information, which limits the Force's ability to fully understand the characteristics of complainants.

Members suggested that future reports could benefit from the inclusion of more qualitative information alongside statistical data. In response to questions about complaint categorisation, the Force explained that categories are determined in line with Independent Office for Police Conduct (IOPC) guidance. Complaint handlers review

each submission and record the relevant categories, with additional allegations being captured where they emerge during the process.

The Panel requested clarification on the meaning of "non-factor" complaints. The Force explained that national factors have only recently been introduced and that some complaints do not align with the available categories. These cases are therefore recorded as non-category matters, whilst still retaining their relevant IOPC complaint categories. An example provided was a complaint concerning police volunteers being dismissed without clear communication.

Discussion also took place regarding references to AI-generated complaints. Members sought reassurance that these were not fraudulent submissions. The Force confirmed that the complaints themselves were legitimate; however, the use of AI by complainants often resulted in significantly longer submissions containing more allegations and greater levels of detail. While this information is welcomed, it can increase the time required to assess and investigate complaints, impacting overall processing times.

Members observed that complaint outcome data appeared to show relatively few apologies being issued. The Force clarified that where service has fallen below expectations, outcomes frequently include explanations, apologies, organisational learning or a combination of these measures. However, the recording system only captures the primary outcome, which is often logged as an explanation. As a result, the published statistics underrepresent the number of apologies actually provided to complainants.

The Panel also queried why only one court proceeding had been recorded. The Force confirmed that this figure was accurate and advised that only a small proportion of complaints progress to court proceedings. Where complainants remain dissatisfied with PSD outcomes, they also have access to an independent review process through the OPCC. The relatively low number of court proceedings was considered to reflect the fact that many complaints arise from errors or service issues rather than deliberate misconduct.

Finally, members sought clarification regarding the percentages shown within the measure type factor table, particularly where complaint types appeared to have been recorded but showed a 0% figure. The Force explained that the table relates to national

factors rather than complaint outcomes and that the percentage figures may have been rounded. Members were also advised that the proportion of complaints recorded as non-factor matters had reduced significantly, from 39% to 9%.

Actions

- Amend the report dates to reflect the correct reporting period of 2025-26.
- Nicole Main to provide a summary explaining the types of complaints recorded as non-category/non-factor cases.
- Consider including additional qualitative analysis within future complaints reports to provide greater context to performance data.

Paper B – Police misconduct

The Force advised that the report contained misconduct data that had originally been scheduled for discussion in December but had not been considered at that time. Members were informed that more recent statistics were now available should the Panel wish to review them at a future meeting.

Members raised concerns regarding the transparency of misconduct information published on the Force website. In reviewing the site, the Panel noted that only one misconduct hearing from May was visible and that there appeared to be no record of previous hearings or notification of forthcoming proceedings. The Force explained that gross misconduct hearings are published in advance of the hearing date in accordance with statutory requirements. Outcomes are published for police officer hearings only, rather than police staff hearings, and remain available online for five weeks before being removed. The Force further advised that some misconduct hearings are currently underway and will be published once authorised for release by the Chief Constable. It was noted that publication arrangements seek to balance transparency with the welfare of officers involved in proceedings. The Force agreed to clarify the minimum notice period required for publicising future hearings.

The Panel expressed concern that the current publication approach may create the impression that very few misconduct hearings take place, particularly as completed cases are removed from the website after a short period and live proceedings are not

always visible. Members suggested that this could impact public understanding and confidence in the misconduct process. The Force acknowledged the point and agreed to consider whether additional statistical information could be published to provide a clearer picture of both completed and forthcoming misconduct hearings.

Discussion then moved to the report's misconduct categories. Members commented that, while the categories themselves were included, it would have been beneficial to understand how many cases sat within each category. Questions were also raised regarding appeal rights and whether complainants could challenge the outcome of misconduct proceedings. The Force clarified that misconduct proceedings, public complaints and criminal proceedings are distinct processes. Whilst a person subject to proceedings may have appeal rights within the relevant process, complainants and victims cannot appeal a court verdict. Public complaints remain subject to separate review mechanisms.

Members also requested clarification on what was included within the "other" misconduct category and sought further information regarding the Force's learning process. The report referred to an organisational learning loop that captures learning from misconduct cases, and the Panel asked how this operates in practice. The Force explained that learning identified through misconduct investigations is recorded by PSD and shared with the relevant department for implementation. Once the learning has been delivered, confirmation is returned to PSD and recorded accordingly. Work is currently underway to streamline the process so that all learning can be managed and tracked through a single system.

The Panel explored the issue of misogyny within policing and asked what action was being taken to address concerns raised by officers and staff. The Force reported that recent survey results indicate a reduction in reports of sexualised behaviour and suggested that this may be linked to ongoing awareness campaigns and Code of Ethics training. It was also noted that robust action has been taken in cases involving misogynistic behaviour. The Force recognised that encouraging reporting may initially lead to an increase in reported incidents and explained that a Standards of Behaviour Board, chaired by a Superintendent rather than PSD, has been established to support departmental leadership in addressing inappropriate behaviour before it escalates into

misconduct matters. Members were advised that forthcoming staff survey results would provide a clearer indication of whether cultural improvements are being achieved.

The Panel also sought clarification on the handling of criminal offences committed by police officers. The Force explained that offences committed off duty are investigated through the criminal justice process in the same manner as offences committed by members of the public, whereas offences arising in the course of duty are managed through PSD processes. Members specifically asked about current rape-related investigations involving police personnel. The Force advised that there is currently one on-duty case and agreed to establish whether there are any corresponding off-duty cases that should be reported.

Actions

- Nicole Main to establish how far in advance police misconduct hearings must be published and provide clarification to the Panel.
- Force to consider publishing additional misconduct statistics to improve transparency regarding completed hearings and those due to take place.
- Force to provide further information on the composition of the "other" misconduct category.
- Rape and sexual misconduct involving police officers to be included as a future agenda item.
- Force to provide updated misconduct statistics for future scrutiny if required by the Panel.

Paper C – OPCC Complaint Reviews Report

The OPCC reported a year-on-year increase in the number of complaint reviews received, which mirrors the overall rise in complaints submitted to the Force. Members were advised that the growing volume of reviews is having an impact on completion times. Similar to the challenges experienced by PSD, the increasing use of AI-assisted submissions has contributed to delays over the last two quarters, as review applications are often longer, contain greater levels of detail and include a larger number of issues requiring consideration. Despite these challenges, the OPCC continues to provide

learning, feedback and recommendations to the Force following the completion of complaint reviews.

The Panel sought clarification on who would undertake complaint reviews once the OPCC ceases to exist. The OPCC explained that the review function is a statutory responsibility and will transfer to the new governance body. At present, however, limited information is available regarding how the arrangements will operate in practice following the transition.

Members noted that only two reviews had been upheld during the reporting period and questioned whether this meant the OPCC had disagreed with the majority of applications received. The OPCC clarified that reviews are only upheld where it is determined that the actions or outcome reached by PSD were not fair and proportionate. In all other cases, the review process concluded that PSD had handled the matter appropriately. The two upheld reviews related to: (1) a complaint concerning a fraud investigation, where the complainant was dissatisfied with the manner in which the investigation had been conducted, and (2) a case where the complainant questioned an officer's impartiality during an investigation and felt that this aspect of the complaint had not been adequately addressed by the complaint handler.

The Panel also asked how the OPCC gains assurance that learning and recommendations arising from reviews are implemented. The OPCC advised that regular meetings take place between PSD and the OPCC to discuss complaints where actions or recommendations have been issued. Progress is monitored to ensure learning is embedded and improvements are delivered. In addition, the OPCC monitors review outcomes for recurring themes, including repeated complaints involving the same officer or similar issues, to identify opportunities for further organisational learning.

Members discussed the wider implications of AI-assisted complaint and review submissions, expressing concern about the potential impact on the volume and complexity of information being submitted by members of the public. While recognising the value of accessibility and detailed submissions, the Panel acknowledged the pressures that increasingly detailed applications can place on review timescales and resources.

In concluding the discussion, members commented that the report would have benefited from a greater degree of evaluative analysis. The Panel agreed that the review process appears to be functioning effectively and providing appropriate independent oversight, although some members reflected that the scope of the review function is inherently limited by its statutory remit and the framework within which it operates.

Paper D Ethical dilemma

CLOSED SESSION

7. AOB

Street warden funding

The Panel sought assurance that the proposed Street Warden initiative represented an effective use of funding and questioned whether the OPCC considered it to be a worthwhile investment. The OPCC explained that the Commissioner is taking a preventative approach and has identified funding from the Prevent budget to support community-based interventions. Similar schemes have been implemented successfully in other policing areas, with supporting evidence referenced within the report. However, the Commissioner's preferred option remains for the Force to deliver the initiative directly, should a suitable policing-led model be identified.

Members raised a number of concerns regarding the proposal, particularly around procurement, governance and value for money. Questions were raised about how a provider would be selected and monitored, how training and support standards would be assured, whether employing Street Wardens represented good value compared to recruiting additional police officers or PCSOs, and whether the research evidence adequately accounted for other factors that may have contributed to reductions in anti-social behaviour elsewhere. Members also sought clarification on accountability arrangements, vetting requirements, access to local intelligence and how wardens would maintain knowledge of local support services and referral pathways.

The OPCC advised that the report was intended as a high-level overview rather than a procurement proposal and therefore did not contain detailed implementation arrangements. It was reiterated that a policing-led approach would be preferable and that the Commissioner is awaiting options from the Chief Constable before making a final decision.

In discussing delivery timescales, the OPCC advised that implementation is hoped for before the end of the year. It was noted that a Force-led model could be delivered more quickly than an externally commissioned service. Should a policing option not be viable, a full procurement exercise would be undertaken in accordance with public procurement regulations. Members were advised that more detailed plans would be developed if the proposal progresses to that stage.

The Panel also queried how effective wardens could be when local services are already under pressure, and questioned the rationale for the proposed operating hours of 10:00am to 7:00pm. The OPCC clarified that the service is intended to supplement existing policing activity rather than provide a separate service and that the scope of the initiative is constrained by available funding.

Further discussion focused on the intended purpose of the scheme. The OPCC confirmed that activity would be primarily targeted towards shoplifting and after-school anti-social behaviour. It was noted that substance misuse is often a significant factor in shoplifting offences and that the Commissioner has already funded a range of substance misuse and anti-social behaviour services to which wardens could signpost individuals. Members queried whether additional funding would be provided to support those services should demand increase. The OPCC acknowledged this as an important consideration that would require further assessment if the project moved into procurement.

Members highlighted concerns regarding the public perception and reputation of Street Warden schemes, noting that experiences elsewhere had not always been positive. The Panel stressed the importance of robust oversight and performance monitoring to ensure the initiative enhanced, rather than damaged, public confidence. In response, the OPCC advised that only appropriately accredited providers would be considered, including those with recognised standards such as SIA accreditation. Independent

evaluation would be built into any commissioned service, and quarterly payment arrangements would provide opportunities for regular performance review.

The Panel also discussed equality, diversity and community confidence. Members asked how the scheme would reassure diverse communities and noted that the wardens themselves should reflect the diversity of the communities they serve. The OPCC advised that equality and diversity requirements are already included within the draft tender documentation and would form part of contractual expectations, with enforcement mechanisms available where standards were not met.

Questions were also raised about the limited powers available to Street Wardens and the potential public expectation that they would be able to intervene in situations beyond their remit. Members noted that perceptions of inaction can attract criticism, particularly on social media. The OPCC stated that any successful provider would need to demonstrate how such risks would be managed. The role is intended primarily as a visible deterrent, with wardens equipped appropriately, including the use of body-worn video for safety purposes.

Finally, the Panel sought clarification on how Street Wardens would engage with the police where police intervention was required. The OPCC explained that wardens would provide additional visibility and capacity within communities and, unlike police officers, would not be abstracted to other operational demands. It was noted that similar approaches have reportedly delivered positive results in areas such as Melton.

Terms of reference review & outstanding OPCC audit

The OPCC advised that the version of the Terms of Reference (ToR) included within the meeting papers was the version currently published on the website and was not the most recent approved document. Members noted that the Panel had agreed revisions to the ToR during 2024 which have yet to be incorporated into the published version. During the discussion, the Panel reviewed arrangements relating to member appraisals and reached agreement on the approach to be adopted. The OPCC confirmed that this would be

formally reflected within the updated Terms of Reference and circulated to members outside of the meeting.

Members were also informed that an audit of the scrutiny panels had recently been completed, with feedback expected in July. The OPCC explained that the audit findings may result in further amendments being required to the Terms of Reference. Any proposed changes would be shared with the Panel for consideration and approval before being implemented.

The Panel queried progress on plans for Ethics Panel members to become involved in other scrutiny panels, noting that there had previously been discussions about expanding member participation but no further updates had been received. Members also sought clarification regarding the allocation of newer panel members to existing or developing scrutiny arrangements.

The OPCC advised that, following Clare's return, work could now progress on allocating new members appropriately.

Actions

Update the Terms of Reference to incorporate previously agreed amendments, including member appraisal arrangements, and circulate to the Panel.

- Provide the Panel with an update on the scrutiny panel audit findings and any resulting changes to the Terms of Reference.
- Nupur and Clare to review progress on the development of scrutiny panels and provide an update before the September meeting.
- Confirm arrangements for the allocation of newer panel members to scrutiny panels

End of meeting