



Joint Audit & Ethics Committee

21st June 2021

Item 21 – Appendix B

TACTICAL ETHICS COMMITTEE

Report for the Joint Audit and Ethics Committee

Virtual meeting held on Thursday 13th May 2021

Chair: Superintendent Stasia Osiowy

Introduction

The Tactical Ethics Committee (TEC) met this week in keeping with the quarterly meeting cycle. Sixteen members attended, with a mix of police officers and staff from different disciplines. Three members, who were unable to attend the meeting, sent observations by email. These observations were raised at the meeting on behalf of the members.

The TEC meeting was dedicated to one item of business, notably the draft Dress and Standards Policy. The full two hours were dedicated to ensuring that there was enough time to feedback on each section of the policy. Of note, the detailed feedback on the policy is provided in [Appendix A](#). An overview of the discussion is provided below:

Dress and Standards Policy (Draft)

Background

On the 27th February 2020, the TEC considered the incumbent Dress and Standards Policy to review ethical currency, relevancy, and accuracy. The TEC discussed how this issue linked with public confidence and the need to ensure the constabulary balances the need to uphold standards whilst treating its staff fairly. There was discussion about the need for an individual to be able to express their own identity set against the need for safety at work and uniformity as a police service.

The TEC agreed that a number of issues were being raised as part of this conversation and there was a need to understand the distinction between standards of dress and appearance linked to officer safety, those of the physical uniform, and that of cleanliness and tidiness. Matters relating to health and safety were also raised and the responsibilities that an individual officer has when performing their duties.

Finally, the question of fairness was raised, and the Committee agreed that there needs to be a balance between individuality and the requirement for the constabulary to revisit its standards of dress and appearance policy. It was suggested that guidance from the College of Policing may assist in this review.

The TEC concluded that the incumbent policy was outdated and difficult to administer.

Following this discussion, Superintendent Osiowy and two TEC members met with Deputy Chief Constable Woods and appraised him of the findings from the TEC meeting. Mr Woods agreed to commission a policy review to ensure that the Dress and Standards policy was up-to-date and fit for purpose. This review was delayed due to Covid-19; however, on Thursday 13th May 2021 Chief Superintendent Procter presented the new draft guidance for review by the TEC.

TEC Objective

To consider if this new guidance is ethical and to what extent the guidance embeds the Code of Ethics; in particular, to the conduct as a police officer and police staff and the requirement to maintain a high standard of appearance when at work, whether in uniform or plain clothes.

TEC Discussion

The Committee had sight of the draft policy prior to the meeting and moved straight into discussing the document. The initial conversation focused on the foreword/introduction section and whether having the Chief Constable introduce this policy was the right thing to do when the Chief Constable does not introduce any other force policy. If Mr Rowley is asked to front this policy then should he not be asked to front all of them, which may increase the bureaucracy around keeping policies updated when senior officers change.

The discussion moved on to the compliance section and fairness for staff. The Committee agreed that to achieve compliance the policy must be clear with staff on the consequences of not complying. It is only fair that staff are given this clarity so that they understand the boundaries of what is, and conversely is not, acceptable. In this same theme, the Committee felt that it was important to be consistent with the terms policy and guidance, which appeared to be used interchangeably. It was agreed that this updated text should be a policy and would benefit from sitting within the formal constabulary policy template. Rationale: this is designed to achieve a corporate consistency that mandates a standard that must be followed, rather than a generalist and loose framework that creates non-mandatory recommendations.

A Committee member then raised an issue on the Diversity, Equality and Inclusion section and asked why gender stood aside from the other protected characteristics of the Equality Act

2010 (p. 4). The Committee felt that it would be better to set each protected characteristic out in the same list to demonstrate equal standing and importance.

From here, the Committee moved on to discuss health and safety, body armour, and hi-visibility jackets with a recommendation for a reword to provide additional clarity on when to wear hi-visibility jackets on a highway. An action was sent to the health and safety team for an update.

Religious headwear was then considered and the Committee felt that the text was consistent with the values of the constabulary, the code of ethics and the wider public. The policy caters for religious headwear whilst ensuring that clarity on use is provided to the wearer.

Suggestions were then made on the wording relating to non-uniformed police officers and police staff. It was agreed that several the points raised in this section did not provide a consistent message and could be re-written with more clarity and in line with national case law. An action was taken away by a member of the Committee to suggest rewording.

The discussion then turned to tattoos, hair, facial hair, cosmetics and jewellery. There was a range of views on these topics, with several recommendations for improvements to this part of the policy. Similar debates were had during the review of the incumbent policy some 12 months earlier, which demonstrates the variation of views on these topics. At this present-day meeting, the views ranged from strong feelings that standards are maintained through uniformity and by reducing the variation for difference, to members of the Committee feeling that these matters have little to no bearing on smartness and professionalism. Consensus was achieved and recommendations to update the policy were provided, which are documented in full in [Appendix A](#).

The final point related to communicating the changes and delivering the policy. Notably, research points to the need to socialise changes of this nature slowly and by seeking feedback from the wider organisation. This way the organisation can ensure that the policy is reasonable, proportionate and can be objectively justified whilst also providing further opportunity to improve the policy.

Outcome

With the relevant amendments, the TEC supports the new guidance on dress and standards. The Committee made several recommendations to improve the guidance, as outlined above. In addition, Superintendent Osiowy offered the TEC services to consider the final draft and to support a wider communication strategy aimed at socialising the policy and referencing the importance of its link to the Code of Ethics, to workforce engagement and to legitimacy within our communities.

Appendix A

Detailed response to the draft Dress and Standards Policy – attached.