



## **Annual Ethics Report**

**Report from:** Sergeant Neal Gillson  
**To:** Chair and Members of the Audit Committee  
**Date:** November 2025  
**Status:** For information  
**Executive & Presenting officer:** Neal Gillson (Presenting)

### **1 Purpose**

- 1.1 This report is to update members of the ethics work of Cleveland Police and to provide a strategic overview of the structures and functions comprising ethics within the organisation. This report naturally overlaps with the Directorate of Standards (DSE) report and some items may be referred to in both reports as a result.
- 1.2 The report covers the period 31 October 2024 to 1 November 2025, this being the only report since November 2024.

### **2 Background and information**

- 2.1 Previous reports have documented the journey Cleveland Police has experienced, including inspections and reports from HMICFRS.
- 2.2 Significant work took place to achieve the positive findings and reports from the Inspectorate, and those efforts continue to do this day – ethics is an ongoing journey and the overall Standards and Ethics portfolio is central to this work.
- 2.3 This paper will update on the continuation of that work, plus new actions and workstreams.

### **3 Ethics portfolio**

- 3.1 There are well established functions within the ethics arena which will be briefly introduced. The various functions support one another and are well connected, as will be highlighted, enhancing the collective value provided.

## Ethics and Standards Board

- 3.2 The Ethics and Standards Board is an internal function and provides strategic oversight and the monitoring and scrutiny of the standards of ethical and professional behaviour, including the prevention and investigation of complaints and misconduct matters.
- 3.3 The Ethics and Standards Board has a formal strategy with an overarching aim of embedding the Code of Ethics and achieving the highest standards of professional behaviour. The Ethics and Standards Board reports to the GAIN Board, itself chaired by DCC Felton.
- 3.4 The Ethics and Standards Board retains this strategy and function, and was remodelled as per the last report to have a wider, more extensive membership from across the organisation. The Board is chaired by the Head of the Directorate of Standards and Ethics (DSE). At the commencement of this reporting period that was T/ Superintendent Matt Murphy-King, and since August 2025 Superintendent Gez Wraith is in that role as both Head of DSE, and Chair of the Ethics and Standards Board.
- 3.5 Over twenty additional roles, mostly Chief Inspectors and Staff equivalents, were added to the invitation list for this Board. Given their operational roles, attendance will not be as consistent as the core invitees, but their involvement will enrich the board in various ways, plus they will be aware of the agenda items and discussions.
- 3.6 This afforded the committee to have representation from CID, Response policing, Neighbourhood Policing, specialist uniform roles, and specialist investigators in addition to the usual lay members, the OPCC, Learning and Development, Human Resourcing, Legal, DSE, Business Support, Executive Project Management, EDI, and more.
- 3.7 The Ethics and Standards Boards meets quarterly to discuss ethical dilemmas and topics, although it has capacity to hold extraordinary meetings as necessary.
- 3.8 In this reporting period, the Ethics and Standards Board has considered the following ethical dilemmas (further details in appendix 1):
- Anonymity in misconduct cases
  - Due diligence in firearms licensing
  - External support for Wellbeing initiatives
  - Prosecution of malicious complaints
  - Home visits in recruitment of officers
- 3.9 This totals 5 dilemma items discussed by the Board, which compares with 9 dilemmas discussed in the 2023 to 2024 period, and 11 in the 2022 to 2023 period.
- 3.10 The Ethics and Standards Board has also contributed or developed a number of items, including:
- Lessons learned – culture of learning and reflection
  - The continued embedding of the Code of Ethics

- Artificial Intelligence in Policing
- Gifts, Gratuities and Hospitality policy
- Vetting
- The Angiolini enquiry and report

3.11 Each meeting produces a written report of the meeting which is shared amongst shareholders and retained on the force's intranet site. An example can be found in appendix 2.

#### Independent Ethics Committee

3.12 Externally, the Independent Ethics Committee has made significant contributions to ethical considerations and is chaired independently by Mr Dave Smith. The Committee is supported by the OPCC.

3.13 The Independent Ethics Committee meets bi-monthly, with the potential to hold extraordinary meetings as necessary.

3.14 Full meeting minutes are published on the [OPCC's website](#), alongside lay member details.

3.15 The committee has considered and provided recommendations on the following ethical dilemmas:

- Anonymity in misconduct cases
- External support for Wellbeing initiatives
- Prosecution of malicious complaints
- Home visits in recruitment of officers
- Communications with the public – informing the narrative, feeding the trolls
- The naming and shaming of recipients of Criminal Behaviour Orders
- The release of ethnicity and nationality information

3.16 This totals 7 dilemmas discussed in this period, compared with 10 in the 2023 to 2024 period, and 11 in the 2022 to 2023 period.

3.17 The committee has also assisted in the following operational developments, policies and procedures:

- The embedding of the Code of Ethics
- Vetting
- Artificial Intelligence in Policing
- Conduct Early Warning System
- Recruitment and retention of under-represented group
- Gifts, Gratuities and Hospitality policy

3.18 Feedback is provided each meeting to the Committee by the Operational Ethics Lead, documenting what has been done with the views, thoughts and guidance of the committee. An example can be found in appendix 3.

- 3.19 Recruitment and membership continues to be prioritised by the Committee which is managed by Chair, a newly appointed Vice Chair, and members, and supported by the OPCC. There have been 10 members in the Committee throughout the reporting period, albeit one sadly passed away and their funeral was attended by representatives from the Committee and force.

#### Youth Ethics Commission

- 3.20 The Youth Committee is a group ran by the OPCC in partnership with an external provider. The meet through the year and each meeting will have a different perspective. In previous reporting periods they have met specifically for ethics related matters, whereas this year they have met for other purposes.
- 3.21 Despite that, the links between the Youth Committee, OPCC, and force continue to exist and their views will be sought when they gather for a dedicated ethics meet in the future.

#### Ethics Advocates

- 3.22 The Ethics Advocates and the development of the group were highlighted in previous reports. Briefly, the Ethics Advocates are staff and officers of various ranks and roles who have an interest in ethics and have received training and inputs. This included two dedicated ethics CPD events, advanced discussion on the Code of Ethics, and practical experience in discussing ethical matters that impact on policing.
- 3.23 The Ethics Advocates are a point of contact for colleagues to approach regards any concerns or advice and also will be a function for centralised messages to be cascaded. The Ethics Advocates are a visible and publicised group, with awareness assisted by badges, information on the internal intranet, email signatures, and posters.
- 3.24 Due to other commitments of the Chair of the Ethics Advocates, Sergeant Neal Gillson, the group have not met in this reporting period to discuss ethical dilemmas. The Advocates have been involved in the delivery and support of the embedding of the Code of Ethics.
- 3.25 The group have met 3<sup>rd</sup> November 2025 to discuss ethical dilemmas again which will be documented in future reports. One area covered there was the single point of failure that lead to the Advocates not meeting during the reporting period which undermines the wider work. A meeting has been scheduled bi-monthly and deputies are able to Chair the meetings if the usual Chair is not available.
- 3.26 Ensuring the Advocates continue to meet and be embedding into the wider committees is a priority for the upcoming reporting period. This will include Advocates attending the Ethics and Standards Board, Independent Ethics Committee and Youth Commission to afford cross-pollination and enhance the overall impact of the committees.

### Regional ethics

- 3.27 Cleveland Police is an active member of the North East Regions Ethics Committee (NREC) which meets every three months and discusses ethical dilemmas and similar issues. The NREC is attended by numerous forces with representatives from the various Professional Standards and Anti-Corruption units.
- 3.28 Cleveland Police is represented here by the Operational Ethics Lead Sergeant Neal Gillson and Head of DSE.
- 3.29 Cleveland Police has raised ethical dilemmas which have been approved for discussion at one of the meetings in the reporting period, namely:
- Sharing of uniformed pictures on social media
  - How forces communicate with communities
- 3.30 The NREC have been advised on the ethics programme employed by Cleveland Police and has the activities have been complimented upon by other forces for the proactive and forward-thinking work. Papers which introduced the Ethics Advocates have been shared and with other forces looking to replicate a similar programme. Durham Police have also benchmarked the Cleveland Police Ethics Committee work in the development of their structure.
- 3.31 The NREC have provided information which impacted some actions within the force, namely:
- What a good ethics structure looks like (Cleveland's being highlighted as a good example)
  - Managing communications regards contentious issues with the public
  - Vetting
  - Recruitment and retention of officer and staff from under-represented groups

### Prevent Team

- 3.32 The Prevent Team has two officers whom work within DSE and CCU, ensuring lessons from misconduct and complaints are embedded, trends are identified, and assisting in ensuring a culture of reflection and learning is adopted across the organisation.
- 3.33 The Prevent Team will present to persons and teams (more details below in section 4) and reports to the Ethics and Standards Board.
- 3.34 The Prevent Team is lead by a Sergeant, and until August 2025 that was a dual-role held by the Operational Ethics Lead. In August 2025 the force took the step of recruiting in a Detective Sergeant whom will work solely as Prevent Sergeant to allow the proactive steps to improving collective standards, behaviour and knowledge of the force to grow.

### Learning and Development

- 3.35 Although a separate function which will be covered in another report, it is important to note the role of the Learning and Development Team (L&D) here. Ethics is *the golden thread of training* and is embedded into all facets of training.
- 3.36 L&D deliver training ranging from initial student officer training, specialist training such as specialist investigations, to ongoing training such as First Aid and Personal Safety Training. Ethics is a key message built into the curriculum of all training.

### Organisational Development Team

- 3.37 Also important to recognise is the work of the Organisational Development Team (OD Team) who work to provide a collection of training and development opportunities, particularly for those in leadership roles. Although documented in their own report, the OD programme is underpinned by the Code of Ethics and goes a long way to enhancing the ethical behaviours and appreciation of the force.
- 3.38 An example of the OD Team's work is the Masterclass Series, referred to in section 4.

### Ethics Committee linkage

- 3.39 There is linkage with all the ethics committees which assists in collaboration and enhances the collective outputs. For example, the Operational Ethics Lead attends the Ethics and Standards Board, Independent Ethics Committee, Youth Committee, Ethics Advocates and Regional Ethics Committee. A representative from the OPCC also attends the internal and external boards and committees too. Mr Dave Smith, Chair of the Independent Ethics Committee also, attends the Ethics and Standards Board.
- 3.40 As mentioned in 3.26, the Ethics Advocates will become a regular fixture in the other ethics committees and boards.

## **4 Initiatives and activities**

### Ethical dilemmas

- 4.1 As highlighted above, there have been numerous ethical dilemmas discussed within the organisation and is in keeping with the view that discussing ethical dilemmas allows the best decisions to be made with sound under-pinning. Such discussion also encourages people to examine the ethical practice in their day-to-day roles with a view to embed ethics into every aspect of business.
- 4.2 An outcome from ethical dilemma discussions may be a definitive answer as to how to respond to a situation. It may also be that the discussion does not achieve a definitive answer, rather it explores options so that if encountered elsewhere, persons are fore-armed with information to assist make an informed and ethical decision.

- 4.3 The awareness of ethical dilemmas in the organisation is assisted by corporate communications and messaging, the work of the above committees and boards, the Ethics Advocates, an internal intranet page housing the dilemmas, and awareness in other presentations (see below).
- 4.4 New technology affords communications and awareness through Viva Engage, part of the Microsoft Office package which allows communications and interactions. Although similar to email and SharePoint, it benefits from greater opportunity to collaborate and connect. Dedicated pages have been created for a DSE channel, and one for the Code of Ethics. These are in their infancy currently and will be reported on in the next report.

#### Staff development – Masterclass series

- 4.5 After the success of previous Organisational Development Team's Masterclass Series', Cleveland Police continued with the Masterclass programme in 2025. The programme was open to all officers and staff and included two separate Ethical Leadership and Corruption Prevention classes in the reporting period. The classes were online via Teams, and the inputs were subsequently recorded without an audience and made available for persons to access on the internal Code of Ethics intranet site.
- 4.6 One was presented by the Operational Ethics Lead, the other by the CCU Prevent Officer.

#### Student officer and staff inputs

- 4.7 The Operational Ethics Lead and Prevent Team officers attend every new intake of student officers, as well as intakes of people taking staff roles, including PCSO, Force Control Room staff and more. The inputs outline the professional requirements of the Standards of Professional Behaviour, Code of Ethics, and general expectations of those within the organisation. This is a fixed and valued part of the initial training new entrants experience.

#### Code of Ethics

- 4.8 As mentioned already, underpinning a great deal of the work of the force, is the Code of Ethics. The initial implementation of the Code which was updated in February 2024 was documented in the previous report and work continues to embed this into all facets of the organisation.
- 4.9 The College of Police provided seven modules for the training of the new Code, including one *in-person* input, delivered by the Operational Ethics Lead, Ethics Advocates, and trainers within force Control Room.
- 4.10 To date, there have been over 80 inputs, delivering to over 1,700 persons within the force, with the delivery programme to continue into 2026. These inputs have been well received and have been adapted to emphasise the wider ethical framework within force.

## **5 Implications**

### Finance

5.1 There are no financial implications arising from this report.

### Diversity and Equal Opportunities

5.2 Whilst there are no diversity or equal opportunity implications arising from the content of this report, it should be noted that some topics considered are intrinsic to the Equality, Diversity and Inclusion agenda.

### Human Rights Act

5.3 There are no Human Rights Act implications arising from the content of this report, it should be noted however that topics considered can often appear to have Human Rights implications, which are always considered.

### Sustainability

5.4 An assessment is to be conducted to ensure the collective committees have appropriate level oversight. As mentioned, the Ethics and Standards Board has Head of Command Chair and reports to the COT Chaired GAIN Board, assurance there is sufficient Strategic-level access and reporting from the committees will take place.

5.5 The above will be reviewed by the DCC, the Head of DSE, and Operational Ethics Lead.

5.6 Additionally, the work of the ethics committees will feed into the Organisational Learning Board. The implementation and progress of this will be reported and documented in the next annual report.

### Risk

5.7 There are no risk implications arising from this report.

## **6 Conclusion**

6.1 Cleveland Police, the OPCC and partners continue to develop both internal and external ethical structures to provide strategic oversight, monitoring and scrutiny of the standards of ethical and professional behaviour.



## Appendix 1 – Ethical Dilemmas

	Topic	Ethics Committees	Organisational learning, outcomes, decisions
1.	<p><b>Anonymity in Misconduct</b></p> <p>In misconduct cases Staff are afforded anonymity. For officers, the default is for the name of the officer to be part of the information released, with anonymity granted only in exceptional cases. This dilemma explores those boundaries and thresholds.</p>	<p>Independent Ethics Committee (September 2024)</p> <p>Ethics and Standards Board (November 2024)</p>	<p><b>IEC</b> – the committee discussed this prior to the reporting period, although the views are documented here for additional context.</p> <p>The committee raised various points, starting with fact the public are not afforded anonymity in criminal cases. Transparency is a fundamental part to policing and the powers and responsibilities afforded to the role generally comes with greater consequence, including fact that any misconduct hearing may be held in the public domain.</p> <p>Overall, the committee felt overall that when a misconduct hearing fell from criminal offending, no anonymity should be afforded, whereas non-criminal reasons could be managed without releasing personal details of those involved publicly.</p> <p><b>E&amp;S</b> - It was acknowledged from the start that the decision as to whether a person is granted anonymity or not is a decision for the Chair of the hearing, as set in legislation. The Conduct Regulations deem that the starting point should be that naming people should be the default unless sufficiently compelling circumstances exist.</p> <p>However, given the lack of clarity as to these thresholds in the Regulations, the decision can be subjective and merits discussion.</p> <p>This process means some are granted anonymity, some are not, is that inherently inconsistent and therefore unethical?</p> <p>Safety concerns were raised. Officers are directed to not travel in <i>half-blues</i>, however someone at the beginning of misconduct</p>

			<p>proceedings could be named, their photograph circulated, and other details in the public domain. Whether they remain in policing or not, their involvement in the force is now known to the public.</p> <p>If increasing public trust is the goal of this, is it the processes of identifying and removing persons that gains trust, not specific named cases? i.e. is it the naming of a person removed from the force for wrongdoing which gains trust, or more the demonstrating that there is an effective process in place to remove those not fit to serve?</p> <p>The Board felt they could not give a definitive answer, but achieved their aim of exploring this so that future decisions would be better informed.</p> <p><b>Outcome</b> – the Chair of the Board fed back the views and considerations to the pool of conduct Chairs who ultimately make these decisions.</p>
2.	<p><b>Due diligence in Firearms Licensing</b></p> <p>This dilemma raised the question as to whether Cleveland Police should follow suit of others whom extend the depth and areas of questions those applying for a firearm license must answer, including checks into those living in the same address. Gwent Police developed a deeper question set under Project Titanium.</p>	<p>Ethics and Standards Board (November 2024)</p>	<p>Previously discussed by the IEC in February 2024 who had concerns that the national Application form did not place enough onus on applicants to disclose wider risks.</p> <p><b>E&amp;S</b> – the Board agreed there was concerns, however there was not a simple fix given the lack of legal basis to extend the information required, plus the capacity of those involved to extend their work.</p> <p>The Board explored the fact that an application has two aspects, one for the suitability of the applicant, the other the suitability of how any firearms will be housed. Would other people present at the address, be that full time or otherwise, influence the suitability of the housing i.e. if a person is unwilling to provide details of whom they live with, does that question the suitability of the safe housing of any firearms?</p>

			<p>This is an area of risk, and proportionate research is required, albeit that may be tailored to each individual case.</p> <p><b>Outcomes</b> – the balance of resourcing to risk is key. The force has been reviewed as performing well in this area and in following APP and National Guidance. However, the committee and Board felt the suggested wider work could be adopted and would be in the public interest.</p> <p>Currently, wider checks are intelligence lead rather than a default. Statutory Guidance in Aug 2025 widened the National Application form and covers more areas, for example, neurodiversity issues are now queried.</p> <p>The Firearms Licensing Unit are aware of the views of the Boards and endeavour to be as productive and effective as they can be.</p>
3.	<p><b>Sponsorship</b></p> <p>Should the force football team accept monies to purchase equipment? And further discussion into sponsorship generally</p>	<p>Independent Ethics Committee (September 2024)</p> <p>Ethics and Standards Board (October 2024)</p>	<p><b>IEC</b> – the committee discussed this prior to the reporting period, although the views are documented here for additional context.</p> <p>The committee felt that the principles within the GGH guidance are of help here. Namely, is the offer genuine, free of obligation, reasonable, and would the force be able to justify it?</p> <p>Context would be key too, is the force approaching the potential sponsor, or they approaching the police? Is the potential partner a suitable and appropriate party?</p> <p>The committee did see the benefit of sport, and if suitable and reasonable sponsorship was appropriately achieved, they could support this.</p>

			<p>This support was with the proviso that measures would be in place to guard against ethical drift and ensure the principles were maintained.</p> <p><b>E&amp;S</b> – the board felt for this specific case, due diligence would be required to ensure the company involved are legitimate and there would be no conflict of interest.</p> <p>Such sponsorship has occurred before with success and been, so if it can be achieved ethically and properly, is a beneficial endeavour.</p> <p>The process and procedures in procurement will assist in such decisions and are to be used / replicated as required.</p> <p><b>Overall</b> – the football team ceased to operate due to unrelated matters. However, the principles provided will be the standard in the future.</p>
4.	<p><b>Informing the narrative or feeding the trolls?</b></p> <p>A submission that invited discussion as to the levels of interaction forces should have with the public, particularly in times of criticism of police action.</p>	Independent Ethics Committee (December 24)	<p><b>E&amp;S</b> – greater detail is in the previous write-up, however, in short, the Board felt engagement is key to public trust and confidence. Internal morale must be considered too, which will lead to a need for appropriate response, and it must be borne in mind that the great majority of the public are supportive of police and the loud, critical minority are exactly that, a minority.</p> <p><b>NREC</b> – discussed prior to this reporting period but included for context.</p> <p>It is timely to raise this in that the NREC is Chaired and hosted by GMP who managed the Airport incident which sparked much debate and appropriate communications from force to the public were crucial.</p>

			<p>The Committee widely felt an appropriate stance would be that not incidents necessitate a formal response. However, where there is misinformation or public unrest issues, the release of a neutral, professional statement would be required. Other factors such as subjudice, individual rights, and privacy are to be considered on what will be a case-by-case basis.</p> <p><b>IEC</b> – the committee felt this was important to get right, but also a complex matter. Releasing a neutral, accurate, and timely response to relevant matters is best, and will be supported by having a bank of statements which can be used as a template.</p> <p><b>Outcome</b> – the views of the Boards and Committee were discussed with the Corporate Communications Team.</p> <p>The force’s approach to addressing false information in a professional manner but not getting into debates were seen as mature and professional and to continue.</p> <p>The Code of Ethics training examines this topic and encourages discussion which seeks to achieve a more mature understanding of this complex matter.</p>
5.	<p><b>Restrictions on social media pictures in uniform</b></p> <p>This dilemma sought to explore whether policy was appropriate regards officers / PCSOs being able to post pictures of themselves in uniform on social media.</p> <p>Many such posts would not be suitable, but what about a post on a passing-out ceremony for example?</p>	Northern Region Ethics Committee (March 2025)	<p><b>NREC</b> - Six of the seven forces present had similar approaches and prohibited personal social media accounts from sharing images of officers / staff in uniform. All cited a risk to the safety of those who identified themselves online, plus risks to their families etc if the account will reveal home addresses etc.</p> <p>Forces also cited reputational risk if an officer / staff persons posted images, and then start posting inappropriate things – would the latter posts be seen as being from an official source and representative of the force itself?</p>

			<p>One force said they don't have such a stricter policy, only that operational pictures can't be shared, but ones such as a pass out parade could be.</p> <p><b>SUMMARY –</b> Cleveland is largely in line with others on this matter, with safety concerns being the main reason to not permit this sort of activity. However, persons are still able to take and retain photographs for personal use.</p>
6.	<p><b>Naming and shaming?</b></p> <p>The force will communicate information of those issued with Community Behaviour Orders (CBOs) via posters and social media. This will include name, photograph, and other personal information when relevant.</p> <p>Is this ethical, and does it present a safeguarding risk?</p>	Independent Ethics Committee (March 2025)	<p><b>IEC –</b> The committee saw benefits and risks in this. A major consideration was whether this was effective in reassuring local communities or not? The argument for was that those issued a CBO would be known to cause issues locally, so seeing they were being held accountable and dealt with criminally was reassuring, and likely a deterrent to others.</p> <p>The opposite argument was whether this communication would unsettle local communities, and whether it placed the offender and their family at risk. For example, would those identified be targeted, placing those they live with at risk?</p> <p>The committee felt that so long as thought is given to wider risks and safeguarding prior to a CBO being communicated, and mitigation was in place, this activity was supported.</p> <p><b>Outcome</b> Stakeholders in this matter were informed of these views, including the need for assurance that prior to the communication of CBOs, consideration was made regards the risks and mitigation, and such action was recorded and rationalised.</p>

7.	<p><b>External companies supporting Investigator Wellbeing days</b></p> <p>Would it be appropriate for the force to seek support from external partners and businesses to benefit events within force which looked to boost wellbeing? For example, could the force replicate a common practice in some industries whom will host a day where employees will be able to access treatments, massages, refreshments etc?</p>	<p>Ethics and Standards Board (May 2025)</p> <p>Independent Ethics Committee (June 2025)</p>	<p><b>E&amp;S</b> – the Board did ultimately support this, recognising the benefit, but also the potential harm.</p> <p>A regional Department within force had held similar events in the past with success and without issue, so there was precedence.</p> <p>Considerations and measures were suggested, including the need to not lose sight of public service, to maintain policing without fear or favour, and to be mindful of public perception.</p> <p>On balance, there were concerns in this matter, but there was also recognition of the wellbeing aspect – there are many issues impacting wellbeing that have a real and harmful effect on people, not least the effectiveness of officers and staff in their endeavour to protect the public if they themselves are struggling.</p> <p>Overall, the principles of the GGH guidance are to be followed and will assist ensure any action is suitable, ethical, and would withstand scrutiny.</p> <p><b>IEC</b> - Initial thoughts were that doing so does not feel right and would raise concerns of transparency and impartiality.</p> <p>Considerations as to what the other party would get in return would need to be explored and managed – for example, would they be able to advertise their involvement?</p> <p>The benefits of supporting wellbeing were highlighted, indeed it is essential to do so. However, is this appropriate, and would it cause more harm? For example, if this was for select people only, would the negative impact of that outweigh the benefit? Would the force harm its impartiality?</p>
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			<p>Also relevant was the sentiment that if wellbeing work assists those in policing to be more effective in protecting communities, does that benefit outweigh concerns?</p> <p>This does go against the Gifts, Gratuities and Hospitality (GGH) policy, so begs the question as to whether the Guidance is to be assessed?</p> <p>Overall, it was agreed that if the force can ensure there is appropriate due diligence in selecting other parties, does not jeopardise its impartiality, and manages the internal impact well, then there is support for this. However, it is reiterated that this is fraught with danger and appropriate consideration and procurement processes are necessary.</p> <p>There was support for a proposed amend to the GGH Guidance also.</p> <p><b>Outcome</b> - the views of the board and committee showed that if handled and approached appropriately, this would be a beneficial endeavour.</p> <p>Having guidance and support would be necessary, and they would come from policy and stakeholders such as Procurement able to advise. The policy holder has been approached with view to add the following –</p> <p><i>in exceptional circumstances, approaching external parties to support events is permitted, but must only be done with appropriate support and approval with various considerations and safeguards in place.</i></p>
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8.	<p><b>Prosecuting malicious complainers?</b></p> <p>This dilemma explored whether there could ever be merit in pursuing a conviction against a member of the public who knowingly makes a false complaint against police.</p> <p>This does go against the very spirit of the complaints mechanism which looks to encourage rather than discourage complaints. However, a case was brought forward where an officer was alleged to have used a racial slur during a traffic stop. This was proven to be false due to Bode Worn Video (BWV), and all evidence suggested there was no mistake, it was intentionally malicious and could have led to Gross Misconduct proceedings.</p>	<p>Ethics and Standards Board (May 2025)</p> <p>Independent Ethics Committee (June 2025)</p>	<p><b>E&amp;S</b> - the first point raised with this was that this is an opportunity for the force to show the public that false and malicious complaints will not be tolerated and show support for the officers.</p> <p>The Board could see merit in this for various reasons, however, the harm to public trust and perceptions may outweigh any benefits.</p> <p>Would the deterrent to genuine complaints be more harmful in the long run too?</p> <p>Although some false allegations could be deemed criminal and prosecuted as such, alternative actions such as control strategies would be more appropriate in all but the most extreme of cases.</p> <p><b>IEC</b> – The committee explored this and saw it as a deep and nuanced, but also as a very important matter.</p> <p>Complaint that are false and made in the <i>heat of the moment</i>, but later rescinded in due course, should not be pursued via criminal prosecution.</p> <p>Public opinion and the impact on confidence is important. A headline could undo a lot of positive work in this area, but a measured and communicated prosecution could be beneficial to all, and in reality, only those making false and malicious complaints should be concerned in the future.</p> <p>Internal measures such as control strategies, and markers on police systems were also explored and supported.</p> <p>Overall – the committee felt this is a very difficult area, and each case must be assessed on its own merit. However, there is support that in the most exceptional of circumstances, formal criminal proceedings <i>could</i> be appropriate.</p>
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			<p>It was also a timely reminder that the use of BWV is paramount to capturing evidence, as well as enhancing public trust. The protection of officers from complaints will also occur with the use of BWV.</p> <p><b>Outcome</b> – the views of the IEC were invaluable and showed that there could be support of this in the most extreme circumstances.</p> <p>Although it is extremely unlikely that a malicious complainer would be prosecuted, should a case be so persuasive that this option is considered, a more informed decision can be made as a result.</p>
9.	<p><b>OPCC use of X</b></p> <p>Some companies and bodies, such as BMW, NEAS and more are moving away from X (formerly Twitter) due to an increased feeling that the platform is unregulated and toxic – should the OPCC use the platform and associate with such a company?</p>	<p>Independent Ethics Committee (June 2025)</p>	<p><b>IEC</b> - The committee discussed this and explored wider social media (SM) use. There are various uses of SM, from engagement, to sharing of important messages, for example road closures, missing persons etc.</p> <p>The committee queried if X gains greater views, and therefore is viewed by more of the community, and if other platforms are equally unregulated and prone to hate.</p> <p>Colloquially, the Corporate Communications Team felt the Force's posts got less <i>traction</i> and engagement on X than elsewhere.</p> <p>A key factor was fact that X invest much less on regulation, such as fact-checking, and removing inappropriate comments compared to Meta (Facebook and Instagram). X also is believed to utilise purposefully controversial material to gain views via <i>rage-baiting</i> than others and holds much more right-wing material.</p> <p>Overall – the committee agree that if X is unregulated and hateful, and other platforms achieve the same information sharing and engagement results, then it is appropriate for the OPCC (and by extension the force) to dissociate itself from the platform.</p>

			<p><b>Outcome</b> – The OPCC has ceased its use of X, and although the Force’s X account is still live, it is dormant in terms of not being used for the same reasons as above.</p> <p>Engagement and communication is not hampered by using other platforms and not X, so whilst X remains in its current state, both bodies will not utilise X.</p>
10.	<p><b>Home Visits on Recruitment</b></p> <p>Recommendation 7 of the Angiolini Report is that forces should incorporate home visits as part of the recruitment process for officers. This is in keeping with the intention of ensuring those who may cause harm do not join policing.</p> <p>An element to this dilemma is whether applicants from different communities would be impacted disproportionately?</p>	<p>Northern Region Ethics Committee (July 2025)</p> <p>Ethics and Standards Board (September 2025)</p> <p>Independent Ethics Committee (October 2025)</p>	<p>Latterly discussed at E&amp;S and IEC September and October 2025 respectively.</p> <p><b>NREC</b> – the Committee put forward that some under-represented groups may be more likely to be resistant to their family members joining the police. If that lead to some anti-police feelings / actions on the home visit, should that be reflected in any recruitment decisions?</p> <p>Although very generalised, this was a factor to consider, and there were concerns that home visits may lead to some applicants from under-represented communities being less likely to apply at all.</p> <p>The committee did also question if a home visit would be the best method to achieve its goal, is it too much of an intrusion, and ensuring this was adopted fairly, consistently and ethically was key.</p> <p><b>E&amp;S</b> - The Board did see the benefit in the home visits – it is an additional opportunity to assess applicants, to ensure they understand the impact the role would have on them, the expectation and requirements, and is that compatible with their lives?</p> <p>The Board however also saw potential issues – who would manage and conduct this work (and absorb the demand)? How would potential bias be negated? What training and frameworks would be</p>

			<p>provided to allow appropriate assessment of those visited? And how much weight is afforded to this aspect – if a great candidate lived in a high-crime area, or lived with family who were less than welcoming to police, would that be a decisive element?</p> <p>Overall, the Board felt that if this process was adopted with appropriate considerations, and suitable guiding frameworks, it would be beneficial.</p> <p>This will be assisted by appropriate discussions, and the brief dialogue here demonstrated that this was a deep and nuanced topic.</p> <p><b>IEC</b> – The Committee felt that this action would not be a panacea, and did hold risks of wider, unintended harm, but if handled correctly could be beneficial.</p> <p>Having training and criteria for those involved in the visits was key to avoid bias, inconsistency, but actually to be effective. The committee felt this action could be better achieved by getting references from previous employers, although that itself may cause issues and would it prevent people for whom policing is their first job?</p> <p>Given this is likely to be put in place, the ethics would be in <i>how</i> it is implemented - itself a wide, expansive and nuanced topic.</p> <p><b>Outcome</b> – all groups voiced concerns over the effectiveness of the recommendation and its wider impact. However, given it is going to be adopted by policing, the committees can be a part of the process in terms of its implementation, criteria, as well as review.</p>
11.	<p><b>Release of ethnicity and Nationality information</b></p> <p>This dilemma explores the application of recent NPCC Guidance to reveal the ethnicity and nationality</p>	Independent Ethics Committee (October 2025)	<p><b>IEC</b> – the Committee found this an interesting and intricate matter. The NPCC Guidance refers to release of information on charge, but is that going to be too late on occasion? Does it need to be on arrest in some cases?</p>

	<p>of offenders in high-profile cases where misinformation may lead to public unrest.</p>		<p>How does that sit with privacy and not prejudicing cases? The Committee felt personal details that relate to name etc are not appropriate to release prior to charge, but some demographic information could be released.</p> <p>The question was posed, to whom are we answering? If police release this more frequently, it will become expected, and is it really only being communicated to appease the small, violent minority as opposed to wider society?</p> <p>As society changes, as must policing, so if the release of some information that is still not revealing someone's identity quells an outbreak of disorder, that may be justified.</p> <p>This must not become standard, and if it is done, it is done so under strict criteria.</p> <p><b>Outcome</b> – the views of committee will feed into wider discussions on this, with Corporate Communications aware who ultimately are in charge of these matters.</p>
12.	<p><b>Proof of requirement for reasonable adjustments</b></p> <p>This dilemma examined the approach to providing reasonable adjustments for issues such as anxiety, menopause, neurodivergence etc on promotion processes. GMP currently have a process which asks those who wish to apply for reasonable adjustments to do so with supporting evidence, be that medical reports or similar.</p>	<p>Northern Region Ethics Committee (September 2025)</p>	<p><b>NREC</b> – The Committee discussed this, raising several points.</p> <p>The Equality Act is relevant, indicating that requiring Medical evidence <i>may</i> impinge the rights of the individuals unless justified, and some issues cannot be easily diagnosed and documented.</p> <p>The discussion highlighted a lack of consistency across forces, with some asking for medical evidence, others not. Additionally, there was inconsistency in what adjustments are afforded to individuals across the different forces.</p>

	<p>The dilemma is whether it is appropriate to ask for this supporting evidence?</p>		<p>It was raised that a thorough Equality Impact Assessment may help as it will ensure a decision is reached with due thought and consideration.</p> <p><b>Outcome</b> – Cleveland does not necessarily require evidence to support any declaration. The force does however require that all information submitted as part of an application process is genuine and honest. Should a person be found to be untrue in this, they could be subject to conduct and discipline issues.</p>
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## Appendix 2 – example of the write-up of the Ethics and Standards Board



Operational Ethics and Standards

POLICING CLEVELAND TOGETHER



PROTECT  
PEOPLE



PROTECT  
COMMUNITIES



TACKLE  
CRIMINALS



BE THE BEST  
WE CAN BE

### **Ethics and Standards Board - September 2025**

This document is a record of the Ethics and Standards Board dated 3<sup>rd</sup> September 2025 and is shared with the circulation list for information and recording purposes. It is not a detailed minute of the meeting.

Attendees: Gez Wraith (Chair), Mick Campbell, Mark Hattersley, Shaz Ali, Denise Jackson, Xanthe Tait, Lindsey Horton, Darryl Tomlinson, Nadine Smith, Sean Craggs, Kirsten Gowland, Emma Doubooni, and Neal Gillson.

**Introductions** were made from the attendees. This was first meeting since the arrival of D/Supt Wraith as Head of DSE and Chair of the Ethics and Standards Board.

#### **Action and decision log**

Updates passed.

#### **Ethical Dilemma – impact of home visits on recruitment**

For context, the Angiolini report has recommendation that forces *should* include a home visit (as well in-person interviews) as part of the officer recruitment process. This recommendation will likely be adopted by all forces, and the report gives the purpose – to ensure those who may abuse their position are more likely to be identified.

However, the report does not provide details of *how* such a process would be implemented.

An unintended negative consequence could be the impact it has on applicants from families / communities who have less trust in the police or live in high crime areas.

The crux of the matter was the suggestion that if an applicant were to come from a minority background that have traditionally had less trust in police, would that negatively impact their application into policing, or prevent their application in the first place?

The Board did see the benefit in the home visits – it is an additional opportunity to assess applicants, to ensure they understand the impact the role would have on them, the expectation and requirements, and is that compatible with their lives?

The Board however also saw potential issues – who would manage and conduct this work (and absorb the demand)? How would potential bias be negated? What training and frameworks would be provided to allow appropriate assessment of those visited? And how much weight is afforded to this aspect – if a great candidate lived in a high-crime area, or lived with family who were less than welcoming to police, would that be a decisive element?

Benchmarking via other forces was discussed. Cheshire are doing this already and were able to highlight a case where a candidate's undisclosed background (which involved a dishonourable discharge from the Armed Forces) was discovered, but also completed these visits with only one person, they emphasised *gut-feeling* in the process, and would tolerate any negative impacts on equality the work had.

It was raised as to whom would complete this. Is it a Vetting or Recruitment function?

It was highlighted that an effective EIA should negate any potential harmful consequences. Overall, the Board felt that if this process was adopted with appropriate considerations, and suitable guiding frameworks, it would be beneficial.

This will be assisted by appropriate discussions, and the brief dialogue here demonstrated that this was a deep and nuanced topic.

This will become an agenda item for future highlighting.

### **Code of Ethics – rollout and implementation update**

Neal Gillson provided an update as to the programme of embedding the Code. There is a plan in place and Cleveland compares favourably to many forces, however this is a large culture piece. The principles of the Code must be common language, underpin all our activities, and the straightforward message of the Code must be understood by all.

The HMICFRS will examine forces on this by means of a ten-point checklist, with a RAG score for each area. The Inspectorate do not expect forces to be green in all elements, but must have a plan to attain that.

Offer to support this programme was made, Neal Gillson will present this to the Executive Board, and the matter will continue to be a standing item.

### **Scrutiny of Vetting decisions**

It is imperative that force Vetting decisions are fair, appropriate, and do not involve bias on behalf of the decision-makers. In particular, forces must ensure there is no disproportionality in decisions. To assist this, the Force Vetting Manager provided two cases where a person with a protected characteristic was refused vetting with request the Board assess this decision and rationale.

Of the cases provided, the Board supported the decision. However, to provide greater value to this work, more cases will be provided with greater time for the attendees to assess the decisions.

This will become a standing item for discussion.

### **Any other business**

None raised.

Neal Gillson, Sergeant 2109 Operational Ethics Lead

September 2025



### Appendix 3 – example of feedback to and from the Independent Ethics Committee



#### **Independent Ethics Committee feedback June 2025**

Following the IEC meeting held 11<sup>th</sup> June 2025, the committee's views and recommendations on the matters discussed are documented, along with any feedback from the force resulting from the IEC's guidance.

Full minutes are created and held with the OPCC on their website, some direct points are recorded here.

Attendees – Dave Smith (Chair), Charlie Rumins, Shirley Johnston, Sarah Johnston, Tresor Bukasa, Elise Pout, and Neal Gillson

#### **IEC feedback to Cleveland Police**

##### **Ethical dilemma – OPCC's use of X**

This submission looks to explore whether the OPCC should follow suit of other organisations and public bodies who are stepping away from the use of X (formerly Twitter) due to concerns over the platform.

The committee discussed this and explored this and wider social media (SM) use. There are various uses of SM, from engagement, to sharing of important information, for example road closures, missing persons etc.

The committee queried if X gains greater views, and therefore is viewed by more of the community, and if other platforms are equally unregulated and prone to hate.

It was felt that if X gained more views, it still would be viable to use, even if only for information sharing purposes and not posts which aim to encourage discussion.

Such data is not always possible with 100% accuracy due to the information being held by the provider, however colloquially the Force's Corporate Communications Team felt the Force's posts got less *traction* and engagement on X than elsewhere.

It was pointed out that Facebook allows people to comment without their actions being easily evident, whilst every X account has a tab which allows instant viewing of comments and replies, so therefore greater visibility. Does that mean Facebook does less to discourage negative or even hateful comments through this lower level of accountability?

A key factor was fact that X invest much less on regulation, such as fact-checking, and removing inappropriate comments compared to Meta (Facebook and Instagram). X also is believed to utilise purposefully controversial material to gain views via *rage-baiting* than others, and holds much more right-wing material.

Free speech was raised, as well as the difference between unlawful activity versus morally wrong (but lawful) material online.

The fact the riots of 2024 were largely sparked by false information that spread more widely on the less-regulated X possibly indicate the difference of X to others?

The need to have a strategy regards monitoring online activity and engagement, including having a crisis response plan was discussed. The Red Cross approach is to have 24/7 monitoring and persons posting inappropriate things are assessed, removed if appropriate, and people contacted directly to advise on what is appropriate and not.

Overall – the committee agree that if X is unregulated and hateful, and other platforms achieve the same information sharing and engagement results, then it is appropriate for the OPCC (and by extension the force) to dissociate itself from the platform.

### **Ethical dilemma – prosecuting complainers?**

The committee explored whether there could ever be merit in pursuing a conviction against a member of the public who knowingly makes a false complaint against police.

This does go against the very spirit of the complaints mechanism which looks to encourage rather than discourage complaints. However, a case was brought forward where an officer was alleged to have used a racial slur during a traffic stop. This was proven to be false due to Bode Worn Video (BWV), and all evidence suggested there was no mistake, it was purposefully malicious, and could have lead to Gross Misconduct proceedings where an outcome could have been dismissal without notice.

It was put forward that should a complaint that is false be made in the *heat of the moment*, but later rescinded in due course, then it would not be appropriate to pursue any form of prosecution.

It was also explored that a complaint may be a one-off, and the accused person be by chance, i.e. the officer who conducted the traffic stop. A complaint may also be a series of complaints against the same person and be harassing in nature. Both may be worthy of prosecution, but the difference is important to note.

This lead to point that does the force have responsibility to safeguard officers and staff against malicious complaints? Complaints can be very directed to an individual who bears the brunt of the worry and concern whilst the complaint is investigated (and thereafter possibly). A person could take a private prosecution for slander or libel offences, but any prosecution should be made by the force.

Potential offences were discussed, noting the difficulty in most offences, and fact harassment may be the most appropriate offence as opposed to wasting police time or perverting the course of justice.

Public opinion and impact on confidence is important. A poor headline could undo a lot of positive work in this area, but a measured and communicated prosecution could be beneficial to all, and in reality only those making false and malicious complaints should be concerned in the future.

Internal measures such as control strategies, and markers on police systems are supported, as is communicating this to the public who are involved. This could even be part of an informal outcome where a letter is sent to the malicious complaint advising of potential legal action, as well records of *alleges* on police systems.

Overall – the committee felt this is a very difficult area, and each case must be assessed on its own merit. However, there is support that in the most exceptional of circumstances, formal or informal action would be appropriate.

### **Ethical dilemma – external companies supporting wellbeing events**

The suggestion of approaching external parties to support force wellbeing days was explored. Initial thoughts were that doing so does not feel right and would raise concerns of transparency and impartiality.

Considerations as to what the other party would get in return would need to be explored and managed – would they be able to advertise their involvement?

The benefits of supporting wellbeing were highlighted, and even the need to do so. However, is this appropriate, and would it cause more harm? For example, if this was for select people only, would the negative impact of that outweigh the benefit? Would the force harm its impartiality?

Also relevant was that if wellbeing work assists those in policing to be more effective in protecting communities, does that benefit outweigh concerns?

This does go against the Gifts, Gratuities and Hospitality (GGH) policy, so begs the question as to whether the Guidance is to be assessed?

Overall - it was agreed that if the force can ensure there is appropriate due diligence in selecting other parties, does not jeopardise its impartiality, and manages the internal impact well, then there is support for this. However, it is reiterated that this is fraught with danger and appropriate consideration and procurement processes are necessary.

There was support for a proposed amend to the GGH Guidance of:

*in exceptional circumstances, approaching external parties to support events is permitted, but must only be done with appropriate support and approval with various considerations and safeguards in place.*

This does require appropriate and ethical interpretation of that condition, including ensuring the assessment, approval and application.

### **Feedback to the IEC from Cleveland Police**

The organisation is extremely grateful for the views, recommendations, and feedback from the IEC. Indeed, the fact HMICFRS have viewed positively on the ethical work ongoing within the force and

has assisted in the removal of Cleveland Police from special measures, highlights the value of this committee.

#### **Ethical dilemma – OPCC use of X**

The OPCC, and in turn the force, take the views and feelings of the committee and will use that to support their decision to dissociate itself from X.

#### **Ethical dilemma – prosecuting complainers?**

The force and OPCC is grateful for the views and discussion points. The matter is very important to public trust and confidence, and the fact there is support from the committee which in terms represents the public is beneficial. Discussions continue and although the force will not rush into formal action, it is an option and other informal outcomes will be explored.

#### **Ethical dilemma – external companies supporting wellbeing events**

The force is grateful to the discussion and views. These in turn will help direct the force to ensure that before any such action takes place, it is explored thoroughly and guidelines in line with the views of the board must be achieved.

The GGH guidance will be amended accordingly with approval of the Ethics and Standards Board who own the policy.

## Appendix 4 – example of the write-up of the Northern Region Ethics Committee



### **Northern Region Ethics Committee September 2025**

Below is a summary of the Northern Regional Ethics Committee (NREC) held 23<sup>rd</sup> September 2025, including any learning opportunities. An Executive Summary is included.

This was the third meeting held by new hosts, GMP, with C/Supt Nicola Spragg Chairing the meeting.

There were representatives from Cheshire, Cleveland, Cumbria, Durham, Lancashire, Merseyside, North Yorkshire, Northumbria, Police Scotland, South Yorkshire and West Yorkshire.

#### **Executive Summary**

All forces are completing the NPCC, HMICFRS **Code of Ethics Self-Assessment Tool**, a large part of which is the **Duty of Candour**. The Assessment Tool is relatively simple and affords an honest reflection of where forces are, where they need to be, and the route to get there.

The Angiolini Recommendation to complete **Home Visits during officer recruitment** is being discussed at a National Level. If poorly handled, it will not be effective and could have unintended negative consequences. However, if implemented and utilised effectively, the process will be beneficial. A National Working Group will look to deliver Guidance on this soon.

Forces who do not utilise external groups to discuss ethical matters are missing out on opportunities and not exploring matters as well as those who do. Previous assessments on **what does a good ethics structure look like** found police-only groups rush to find solutions, whilst external groups will explore a wider variety of matters and ultimately arrive at a better-informed decision.

**Guest Speaker Adam Kramer** works on **Insider Threats** at **Barclays Bank**. He has developed a set of usual behaviours, both for individuals and roles, and deviation from that triggers assessment. For example, where a person usually on accesses a vault on a morning, them doing so on an evening would be flagged. The team will map a **Criminal's Journey** when they have issues which forensically examines the steps that could have been in place to stop or make more difficult wrongdoing. This is done in a **blame-free** manner which looks to improve and cascade learning.

#### **Main discussion points and takeaways for Cleveland Police**

Each of the main points raised are briefly discussed below.

## **National updates**

Following are the updates and discussion topics that took place in the National Ethics Committee, provided by the NREC Chair C/Supt Nicola Spragg. The National meeting took place on 4<sup>th</sup> September 2025.

### **HMICFRS Self-Assessment tool**

The NPCC Ethics Lead asks that the self-assessments are shared with the NPCC Lead - this is not mandated but a request to better understand where forces are, best practice etc.

### **Duty of Candour**

The duty of Candour was discussed, with forces and others in public sector having the same duty, particularly in public enquiry cases. In this matter the Police are seen as being ahead of others in establishing this candour and abiding to it.

### **Data Ethics**

There is a National Data Ethics working group and a representative attended the National Ethics Meeting. They provided an overview of Data Ethics, a growing area of business, and are keen to create a National Working Group who will provide direction in due course.

### **National Ethical Dilemma discussions**

On 22<sup>nd</sup> September 2025 there was the dilemma discussion meeting and they explored the Angiolini recommendation for **home visits on recruitment** as an ethical dilemma. The National group had similar discussions to the NREC, including concerns over unintended consequences, as well as questions as to its application and implementation.

The force leading on this, Cheshire, perform this as a Recruitment HR function, not PSD or Vetting, and see it as a great success.

In conclusion, the National Group felt this was an important of business and its success or otherwise stems from informed discussion in the inception of the work, sound structure to carry out the visits, and suitable principles to deal with any findings. The National Ethics Committee feeds into a National Working Group setup for this recommendation, and they are collating views and will look to provide guidance in due course.

Another ethical dilemma raised related to the recent **NPCC Guidance on the release of ethnicities of perpetrators** in relevant incidents. They concluded that there are many nuances to this, a true dilemma at times, and a case-by-case approach with set principles is required. Guidance will follow to aid consistency across the forces.

### **Individual Force updates:**

All forces updated on relevant matters, with notable points recorded below. Each force also updated on the Code of Ethics Self-Assessment, Duty of Candour and its ethics structure.

**Cheshire** – are the lead on **home visits on recruitment**. They have conducted over 300 home visits to date, and on 30 occasions have found issues, of which lead to 17 persons being removed from the application process. They described issues in tattoos, unsuitable associations, and undisclosed criminal offending. They are keen to extend this approach to transferees.

**Lancashire** – they have discussed medicinal use of CBD. Their stance is that it can be used by officers and staff, but must be disclosed and a fail to disclose would be seen as a conduct issue. They place onus on the individual to know that if their CBD use leads to a drugs test failure, they will need be able to justify this.

Lancashire also had an issue where a **pro-Palestine flag** was displayed by an officer in a private vehicle parked in a work car park which was visible to the public. This was assessed, and with risk to a lack of impartiality, it was to be removed. This was a challenging decision, however the Vetting APP and other Principles supported this outcome.

**Police Scotland** – they have discussed their documenting of both Gender and Sex in their internal recording, something they will continue to do and will spread further.

**South Yorkshire** – noted that their external committees approach ethical dilemma discussions in a different manner than their internal groups. Police are notoriously keen to rush to a solution, whereas the external groups will look at the matter from a wider view which can enhance the discussion and better inform outcomes.

**West Yorkshire** – had a dilemma regards what someone should do if they are on a work night out and witness an affair taking place where all parties are in the force - should the witness inform the person who has been cheated on? Should they highlight to those involved that others are witnessing their behaviour and cease? The force did not provide a definitive answer with the scenario and wanted this to be explored by the force from an ethical and moral stance.

**Cumbria** – have linked Code of Ethics, Upstander, and Sexual Harassment training into one large piece in-person and have this as a rolling input everyone does once.

**Durham** – How to communicate the results of ethical dilemma discussions? They advise stakeholders directly and provide a newsletter to advise the wider force of the discussions and results.

**GMP** – used discussions on facial Recognition to inform the force of ethical discussions, encourage other discussions, and to calibrate their ethical discussion groups as to their functions. GMP are keen for SME's to raise matters, seek wider views, and use that to inform and support decisions.

**IOPC** – they are updating their Guidance for Police Witnesses in line with Duty of Candour, and this enforces the fact that engagement is required, and they encourage forces to act against any persons failing to comply via conduct routes if necessary. The representative was also keen to say how rarely that a witness becomes a subject, something which they feel is a concern for people more generally and a barrier to candour.

**Guest Speaker – Adam Kramer, Inside Threat lead at Barclays Bank**

Adam previously was a detective in the Metropolitan Police, working predominantly in Cybercrime, and then the National Crime Agency (NCA).

His current role within Barclays assesses **insider threats**, balancing cybersecurity, risks, and respecting rights of individuals. Adam likened this work to Police PSD's so is relevant to the NREC. The Insider Threat work can range from low-level theft by employees of cash from tills, to the most extreme risk of an agent from a Hostile State who looks to launder money, steal data, or disrupt the financial stability of the UK.

The Insider Threat Team is both proactive and reactive in identifying persons, minimising risks etc. They seek to create a hostile environment for a person who wishes to be a threat, so that they face as many barriers to wrongdoing as possible.

Other areas include:

- use of technology controls such as not being able to use a USB on work laptops, or limited internet access on work devices;
- passes which limit access to estates and parts of buildings, and lots of secure doors requiring entry via passes;
- they have an equivalent of Vetting when they onboard employees.

However, there were security gaps on Adam's arrival, including:

- the various streams of information were not linked, so a person could be responsible for multiple concerning behaviours, but the various issues would not always be collated;
- a lack of consistency in security protocols in different areas of business, including branches, departments etc;
- trends were not noted.

The **remedies** Adam created included:

- creation of one central system which monitored the various streams of information to identify risks and concerning persons;
- they were behaviour and not person lead in examining issues;
- stakeholders identified 20 behaviours that would be seen as normal and they developed systems which would highlight out of ordinary behaviours. For example, a person usually accesses the vault every morning, so when they accessed the vault on an evening, why? Or if someone tried to save information to a CD, why? A police equivalent would be deleting a person as a suspect to a crime on Niche, or attending a Station when not on duty;
- this created *swim lanes* of usual behaviours, so when someone moved outside of those, a compliance team would assess;
- they look to assess the above breaches as either non-compliance, or more sinister and act accordingly.

Any serious breach lead to a forensic review of the **criminal's journey** – how did they manage to cause harm, which systems failed to identify behaviours, where could the business have prevented the harm and so on. They did so with a view to identifying the issues and failures without attributing individual blame, and to then plug those gaps across the entire organisation.

Where there were individual errors, more local teams would deal with that, but the Insider Threat Team looked to investigate matters without attributing blame as this could hamper the process of



improvement. Adam was keen to highlight that this **non-blame culture** was important to preventing further issues, and this could still be achieved without losing accountability.

Adam discussed **KPIs** - if you find a low number of issues in a branch / department / team, or even none, are you looking properly? He believes that if you look thoroughly, you will always find things. As such, the best KPI measure is a thorough look at issues prior to intervention, then any reductions thereafter - that is meaningful success.

**National Crime Agency** – Adam was one of the tech experts brought into the NCA to compliment the investigators, for example ensuring digital footprints were not left, or relevant data was obtained in an effective manner.

Adam's work involved ensuring the mass collection of data was done effectively and ethically. The NCA (and forces) must justify the collection of data, and balance mass surveillance with effective identification of harmful persons.

**Adam's key principles** – surveillance must be on behaviours, not people, and be bold in rooting-out issues, but do so responsibly, and from a sound privacy, ethical and legal footing.

### **Ethical Dilemma – promotion processes**

This dilemma examined the approach to providing reasonable adjustments for issues such as anxiety, menopause, neurodivergence etc on promotion processes. GMP currently have a process which asks those who wish to apply for reasonable adjustments to do so with supporting evidence, be that medical reports or similar. This in turn will be assessed by a board who determine what, if any adjustments will be provided.

The dilemma is whether it is appropriate to ask for this supporting evidence? The Equality Act states that requiring Medical Evidence may impinge the rights of the individuals, and some issues cannot be easily diagnosed and documented.

A brief discussion highlighted a lack of consistency across forces, with some asking for medical evidence, others not. And also, inconsistency in what adjustments are afforded to individuals across the forces.

A point raised was that a thorough Equality Impact Assessment may help as it will ensure a decision is reached with due thought and consideration.

Overall, not one that can be resolved in the meeting, but the decision makers will be passed the views to assist.

**Next meeting will take place 12<sup>th</sup> December 2025**

**PS 2109 Neal Gillson, September 2025**