

30th September 2008

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**ALL MEMBERS ARE INVITED TO THE DIP SAMPLING OF COMPLETED FILES
AT 1.00PM PRIOR TO THE MEETING**

To: **The Chairperson and Members
of the Professional Standards and Complaints Committee**

Dear Sir/Madam

A meeting of the **Professional Standards and Complaints Committee** will be held on **Thursday 9th October 2008** in **the Meeting Room, Merseyside Police Authority Offices, West House, Mercury Court, Liverpool** commencing at **2.00 p.m.**

An agenda for the meeting is enclosed.

Yours faithfully



Sheena Ramsey
Chief Executive to the Authority

MERSEYSIDE POLICE AUTHORITY

PROFESSIONAL STANDARDS & COMPLAINTS COMMITTEE

MEMBERSHIP

Elected Members

Mrs R Bailey
G Howe (Chairman)
I Jobling
Ms D Kerrigan
Mrs K Wood

Independent Members

Mrs D Clark
Mrs V Davies
Prof A B Zack-Williams
Mrs F Street JP
Vacancy

MERSEYSIDE POLICE AUTHORITY
PROFESSIONAL STANDARDS AND COMPLAINTS COMMITTEE

THURSDAY 9TH OCTOBER 2008

AGENDA

PART 1

Apologies

<u>Item</u>	<u>page</u>
1. <u>DECLARATIONS OF INTERESTS</u>	
2. <u>MINUTES</u>	
To receive as a correct record the minutes of the meeting of the Committee held on 7 th August 2008.	1.
3 <u>PRESENTATION – NEW MISCONDUCT REGULATIONS (TAYLOR REVIEW)</u>	
To consider a presentation by Ch. Supt. M Baines	
A Briefing Note in respect of the presentation is attached	5.
<u>REPORT OF THE CHIEF EXECUTIVE</u>	
4. Police Complaints: Statistics for England and Wales 2007/08 – Report of the IPCC	Report to follow.
5. <u>ANY OTHER ITEM(S) WHICH THE CHAIRMAN DEEMS TO BE OF AN URGENT NATURE</u>	

PART 2

Under Section 100A(4) of the Local Government Act 1972, and having satisfied the requirements of Paragraph 10, the public may be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in Paragraphs 1 & 7 of Part 1 of Schedule 12A to the Act.

Item

REPORT OF THE CHIEF CONSTABLE

6. **Review of Police Complaints**

To consider the verbal report of the Head of Professional Standards indicating cases where police officers are currently under suspension or are on restricted duties pending legal/disciplinary proceedings.

7. **ANY OTHER ITEM(S) WHICH THE CHAIRMAN DEEMS TO BE OF AN URGENT NATURE**

MERSEYSIDE POLICE AUTHORITY

PROFESSIONAL STANDARDS AND COMPLAINTS COMMITTEE

At a meeting of the Professional Standards and Complaints Committee held on Thursday 7th August 2008 in the Meeting Room, Merseyside Police Authority offices, Mercury Court, Liverpool the following Members were present: -

Elected Members

Mrs R Bailey
G Howe (Chairman)
I Jobling
Ms D Kerrigan
Mrs K Wood

Magistrate Members

Mrs F Street JP
Mr JF Williams JP

Independent Members

Mrs D Clark
Prof A B Zack-Williams

Apologies

Apologies for absence were received on behalf of Mrs V Davies.

1. Declarations of Interests

There were no Declarations of Interests received.

2. Minutes

The minutes of the meeting held on 17th April 2008 were received as a correct record and signed by the Chairman subject to the apologies received from Mr J Williams JP being recorded as police authority business.

3. “Learning the Lessons” Bulletins

The Committee considered the report of the Chief Executive on the IPCC Bulletins 2, 3 and 4 of “Learning the Lessons”.

The Chief Executive reported that whilst the information contained in the Bulletins should, in many cases be seen as isolated, there was a need for a process to be established to enable the Authority to engage with the Chief Constable on in-force processes.

Members raised various issues and in particular, cases involving detainees with mental-health difficulties. Members requested that further information on the role of mental-health champions be submitted to the next meeting.

RESOLVED –

- (i) That the Police Authority be recommended to approve that where necessary, the Committee should request further reports on issues contained in IPCC “Learning the Lessons” bulletins or refer issues to relevant committees in order to seek reassurance of practice by Merseyside Police; and
- (ii) that the Chief Constable be requested to submit to the next meeting, information in respect of the role of mental –health champions especially in respect of processes to deal with detainees.

4. Analysis of Complaints

The Committee considered the report of the Chief Constable on an analysis of complaints against the police in the period 1st April to 31st May 2008.

Members raised the continual high rates of reported Incivility. Members felt that certain situations could easily be avoided if an initial exchange was less aggressive. The Deputy Chief Constable referred to anecdotal evidence to the contrary over the Tall Ships/Open Golf Championship weekend in mid-July and to the force’s processes to deal with patterns of complaints in this area and on an initiative to attempt to link reported levels of poor service being managed by the Citizen focus Team.

Members in referring to the table 4.8 requested that complaints allegations be further broken down into Units and whether any correlations exist with the prevalence of operations and direction and control complaints as well as retaining reports on complaints/000 officers.

RESOLVED – That the report be noted.

5. Academy Update

The Committee considered the report of the Chief Constable which set out:-

- (1) The current status of transition of Management Development and Training (MD&T) into the Academy; and
- (2) the latest in relation to the delivery of training.

RESOLVED – That the report be noted and arrangements be made for members of the Committee to visit the Academy.

6. Local Government (Access to Information) Act 1985

RESOLVED - That in accordance with the provisions of the Local Government Act 1972 and having satisfied the requirements in Section 10, the public be excluded for the following item of business on the grounds that it involves the likely disclosure of exempt information as defined in Paragraph 1 and 7 of Part 1 of Schedule 12A to the Act.

7. **Review of Police Complaints**

Members considered the verbal report of the Deputy Chief Constable who circulated information regarding cases where police officers were currently under suspension, on restricted duties pending legal/disciplinary proceedings and involved in current IPCC cases.

RESOLVED – That the report be noted.

Minutes 1 to 7 received as a correct record on the 18th day of September 2008.

Chairman of the Committee
(The meeting closed at 3.40 pm)

Performance, Conduct and Standards of Professional Behaviour

Changes to Police Conduct and Performance Regulations

1.0 Introduction

1.1 Principles of the Taylor recommendations

2.0 What are the new Standards of Professional Behaviour?

3.0 Is it Conduct or is it Performance?

3.1 What will it mean in practice?

4.0 What do the new Conduct Regulations say?

4.1 Initial Assessment by 'Appropriate Authority'

4.2 Misconduct Meetings – Misconduct only

4.3 Misconduct Hearings – Gross Misconduct

4.4 Associated issues

4.5 Timescales

5.0 How will the new Regulations work in practice?

5.1 Dealing with Public Complaints

5.2 Gravity Factors

5.3 Dealing with Internal Misconduct

6.0 Training

7.0 Unsatisfactory Performance Procedures (UPP)

7.1 Introduction

7.2 New Regulations

7.3 Additional Provisions – Moving between Misconduct and Performance.

7.4 Training for UPP

Performance, Conduct and Standards of Professional Behaviour

Changes to Police Conduct and Performance Regulations

1.0 Introduction

The Taylor (Lord William Taylor) Review of Police disciplinary procedures led to The Police (Conduct) Regulations 2008, including new Standards of Professional Behaviour.

The Police (Performance) Regulations 2008 revised unsatisfactory performance processes (UPP) and were developed alongside this work.

It is expected that the new regulations will be implemented across the country on 1st November 2008. The regulations are contained within the Criminal Justice and Immigration Act 2008.

These Regulations apply to Police Officers and Special Constables throughout England & Wales. UPP applies to Officers up to and including the rank of Chief Superintendent (except student Police Officers in their probationary period).

1.1 Principles of the Taylor recommendations

1. There should be a single code of conduct within the police service that should be a touchstone for individual behaviour - if possible applicable to all police officers and staff.
2. Disciplinary arrangements will be based on the following principles
 - a. Police officer discipline will remain regulated by Parliament and not subject to the uncertainty of Employment Legislation.
 - b. Framework should be simple and based on the **ACAS** model.
 - c. **Learning and development** will be an integral part of the system albeit sanction has a part to play
 - d. The system will be **much less quasi-judicial**. Investigations need not be centred on the crime model. Hearings should be less adversarial.

- e. Initial notification of potential misconduct should be formally assessed with the full range of options available for responding. Assessment can include the option not to use formal conduct procedures; or it may be more appropriate for referral to UPP.
 - f. Conduct issues will be assessed as “misconduct” or “gross misconduct” (dismissal could be justified) to promote, inter alia, proportionality.
 - g. Conduct matters should be dealt with at the lowest level with misconduct (as opposed to gross misconduct) not generally rising above the BCU level.
 - h. Investigations should be less formal and proportionate to the allegation
 - i. There should be a single tier of appeal able to consider the findings and outcomes of hearings.
 - j. Police service must dynamically manage the new system and drive through the necessary **cultural** change.
 - k. IPCC, HMIC and Police Authorities should be proactive guardians of the system and make change happen.
 - l. The system should have **strict time limits** with consequences for unreasonable failure to comply.
 - m. Matters that belong within the remit of capability and the UPP system should be directed to that domain. *It is anticipated that there will be a much greater use of the UPP system that is also being reformed.*
3. The other recommendations were technical in nature to facilitate the above changes

2.0 What are the 10 new Standards of Professional Behaviour?

The 'Standards of Professional Behaviour' replace the 'Police Code of Conduct'. The Standards reflect the expectations that the police service and the public have of how police officers should act whether on or off duty. They are shown below with some illustrative examples:

1. Honesty and Integrity

- Officers act with integrity and are truthful
- Making false statements and records
- Use of warrant card to gain unauthorised advantage

2. Authority, Respect and Courtesy

- Using authority and powers responsibly
- Appropriate language and behaviour

3. Equality and Diversity

- Promote and eliminate unlawful discrimination
- Managers set example

4. Use of Force

- Only if necessary, proportionate and reasonable
- Able to justify application of force

5. Orders and Instructions

- Carry out lawful orders and abide by regulations and policies
- Officers accept restrictions on private life

6. Duties and Responsibilities

- Officers don't neglect their duties
- Accurate records of duties and powers should be made

7. Confidentiality

- Treat information with respect and only access or disclose in course of duty
- Conform to all DPA laws / rules

8. Fitness for Duty (New – Sobriety and Appearance now gone)

- Officers do not make themselves unfit through drink / drugs or other substances
- Officers unexpectedly called for duty shall declare if they are unfit to perform

9. **Discreditable Conduct** (New – incorporates criminal conduct)

- Officers behave in a manner which does not discredit police service/undermine public confidence
- Officers **must** report action taken against them for a criminal offence – includes arrest, summons, PND, EFPN, charge or caution, conviction or conditions imposed by a court.
- **BUT** in all cases it must be articulated **how** the conduct / conviction etc discredits the police service. A criminal conviction may not automatically lead to Misconduct, as it may not discredit the service.

10. **Challenging and Reporting Improper Conduct** (**New**)

- Officers must report, challenge or take action against the conduct of colleagues which have fallen below the standards.
- Officers never ignore misconduct

The Conduct Regulations are intended to avoid lengthy, unwieldy, disproportionate and costly investigations, with a focus on dealing with matters effectively and at the lowest level.

3.0 Is it Conduct or is it Performance?

With the new Regulations it is expected that there will be some departure from the use of Conduct procedures and increased use of the Performance (UPP) processes. It is clear currently that there are some matters dealt with as Misconduct, which should have followed a Performance route.

The new procedures for dealing with unsatisfactory performance and misconduct share common aims, which are to:

- Embed a culture of learning and improvement rather than blame and punishment
- Ensure the confidence of staff
- Enable managers to manage effectively
- Put managers in the driving seat
- Ensure public confidence, fairness and the interests of complainants in these procedures

3.1 What will it mean in practice?

- Early interventions and resolutions
- Open and inquisitorial enquiries (less confrontational)
- Opportunity to evidence your case in a meeting based approach
- Structured and clear processes which are more streamlined
- Reinforcement & development of professional responsibilities
- Matters of Gross Misconduct or Gross Incompetence can be fast tracked

4.0 What do the new Conduct Regulations say?

4.1 Initial Assessment by 'Appropriate Authority'

Once a public complaint or allegation of internal misconduct has been made, the Appropriate Authority must make an initial assessment of the allegations and determine the most appropriate way forward with the investigation:

- The Appropriate Authority is the Chief Officer of Police but this function may be delegated to a member of the force of at least the rank of Chief Inspector or a police Staff equivalent.
- In Merseyside Police, the Appropriate Authority will in the main be the Chief Inspector PSD.
- There is a requirement to identify whether the alleged conduct amounts to Gross Misconduct (***a breach of the Standards so serious that dismissal would be justified***) or Misconduct. This determines potential outcomes – Misconduct Meeting or Hearing.
- Assessment requires continual review during life of investigation.
- Identify appropriate and timely resolution methods especially if there is no likelihood of misconduct proceedings. What does the complainant want? What would resolve it for the complainant?

- The Appropriate Authority can also decide to take no action, management action or refer to Performance Regulations (in cases of internal misconduct)
- There are significant responsibilities for the Appropriate Authority – 51 identified functions.

Once the proportionate investigation has been completed, the Appropriate Authority will make an assessment as to whether or not the matter should go to a Misconduct Meeting (Misconduct only), Misconduct Hearing (Gross Misconduct) or may determine there is no Misconduct case to answer.

4.2 Misconduct Meetings – Misconduct only

- Held at BCU level, chaired by Chief Inspector or above/HR equivalent
- Papers to Chair prior to meeting
- Chair determines how meeting should be conducted
- Presumption that no witnesses are to attend – Chair to decide
- Outcomes (sanctions) available –
 - No action,
 - Management Advice,
 - Written Warning or
 - Final Written Warning
- If officer unable to attend may partake by video link or other means
- May be represented by a 'friend'. Proceedings will not be delayed for specific named representative to be present.

4.3 Misconduct Hearings – Gross Misconduct

- 3 members. Chair to be Senior Officer (ACPO) or Senior HR. If Chair is ACPO then second member may be Supt or above or HR manager. If Chair is Senior HR then second member must be Supt or above. 3rd member from a list of lay members maintained by Police Authority
- Papers to Chair prior to meeting
- Chair determines how meeting should be conducted
- Presumption that no witnesses are to attend – Chair to decide

- Outcomes (sanctions) –
 - No action,
 - Management Advice,
 - Written Warning or
 - Final Written Warning,
 - Dismissal (with or without notice)
- If Officer unable to attend may partake by video link or other means
- May have legal representation. Proceedings will not be delayed for specific named legal representative to be present.
- Appeal to Police Appeals Tribunal – No Chief Constable’s Review
- There remains a fast track procedure – Chair being the Chief Constable

4.4 Associated issues

- ‘Management Action’ is not an outcome (sanction) from misconduct proceedings. Management Action is action or advice intended to improve the conduct of the officer, but where no misconduct proceedings are entered into. There is no requirement for the officer’s agreement.
- With a Superintendent’s Written Warning the officer must accept and agree with it. With a Written warning under the new Regulations, there is no requirement for the officer to agree/accept - it can be imposed.
- If an Officer has a live Written Warning, they cannot be given another Written Warning for further breaches of the Standards. In these circumstances, if a Written Warning were the appropriate outcome, then it would have to be a Final Written Warning.
- If an officer has a live Final Written Warning, further Misconduct proceedings would have to be heard at a Misconduct Hearing.

4.5 Timescales

Throughout the Regulations, there are tight timescales re consideration of case to answer, officer response to charges, any proposed witnesses etc. There are at least 28 occasions during an investigation when a timescale has to be complied with. Some of the key timescales are detailed overleaf:

- Officer, within 10 days of receipt of notice, may make representations to Investigator, provide documents or suggest lines of enquiry
- Officer to be notified of the progress of the investigation every 4 weeks
- Officer notified by IO of interview date. If not available then must be fixed with 5 working days
- Misconduct Meeting to be held within 20 working days from service of relevant documents on officer.
- Misconduct Hearing to be held within 30 working days from service of relevant documents on officer.
- Officers unable to attend fixed proceedings may provide alternative date but it must be within 5 working days of original date.
- A Meeting or Hearing may take place if the officer fails to attend. If officer is ill, a short delay may be reasonable, however, officer may take part via video/phone link.
- On receipt of notification of proceedings, the officer, within 14 working days, is to provide written notice as to admits/denies misconduct or elements not accepted and any mitigation
- Appeals for Misconduct Meeting to be made within 7 working days
- The person appointed to hear the Appeal would firstly determine whether there are arguable grounds for the Appeal.
- If appeal from Misconduct Meeting determined to meet threshold, then appeal to be heard within 5 working days.
- At Appeal the outcome/sanction could be increased from what was determined at the Meeting/Hearing.
- There should be no major time delay due to sickness. The investigation should continue.

5.0 How will the new Regulations work in practice?

For over two years Merseyside PSD has been working towards the adoption of the Taylor principles. We have been making the distinction between Misconduct and Gross Misconduct and subsequently dealing with Misconduct cases in a much more proportionate way. There is still room for greater proportionality; however, the force is seen as being ahead of many other forces in this regard.

Also for some time, complaints which are suitable for Local Resolution have been allocated to BCUs and Departments, to deal with at the lowest, most proportionate level. This has meant that all areas have built up a degree of expertise in this field, which will enable them to continue in this way with the new Regulations.

An area where we see the need for a cultural change is around service recovery. It is our view, shared with the IPCC, that the starting point on any complaint should be around service recovery. Many complainants are not interested in a big investigation (or even in a small one). They want their difficulties/problems to be put right and they may want an apology. This is something as an organization that we sometimes struggle with. However, an early apology may actually resolve the matter far more than any drawn out investigation.

There may also be occasions when it is clear that the complainant has not received a good service and that there is good reason to uphold their complaint. However, there may not be any allegations against any individuals that would be substantiated. This is a big change to current practice where we would not uphold a complaint if none of the allegations against individuals could be substantiated. There are some implications for civil litigation around this course of action.

Merseyside has been key in the collaboration between the northwest forces and a working party has been set up for some time. The regional forces are working together to produce process maps, additional guidance, forms and shared training.

5.1 Dealing with Public Complaints

All complaints will be processed and recorded by PSD. Those assessed by the Appropriate Authority (Chief / Insp PSD) as gross misconduct, or those which have one or more of the below mentioned gravity factors, will be dealt with by PSD as they are now.

5.2 Gravity Factors

Cases whereby one or more of the below mentioned issues are present will be dealt with by PSD.

- Gross Misconduct
- Data Protection Act allegations
- Restriction or suspension necessary
- Complexity issues
- Potential for reputational damage to the Force
- Serious failings in management
- Conflict of interest in BCU/Dept
- Allegations involving discrimination
- IPCC referral/supervised/managed

Complaints assessed as suitable for Local Resolution (LR) will be sent to BCU/Dept to resolve as now. However, in a departure from current practice, if the complainant declines to LR then many of these complaints will remain with BCU to 'investigate' to conclusion.

On the basis that this assessment means that *'even if proved there is no likelihood that criminal or conduct proceedings would follow'*, this by definition means that these are the less serious matters. The investigation will be conducted into the facts of the complainant's dissatisfaction and can be completed without the service of a notice (currently Regulation 9 Notice), on the basis that no misconduct proceedings are anticipated.

PSD have delivered some training to BCU staff in an effort to improve local resolution rates, with some success, although there is still variation between them. More training is planned. When preparing properly for local resolution, officers should have done sufficient enquiries to establish the facts anyway and there should be very little, if any, further investigation required.

There are cases that are sent to BCU to attempt LR even though if proved they may result in proceedings. This is done on the grounds that the complainant may accept LR on explanation of the facts and a better understanding of the special nature of policing and the legal application of powers.

An example of such a matter would be a complaint about excessive force being applied during arrest. If an officer used excessive force then this may amount to an assault. However, officers are allowed to apply force so long as it is reasonable and justified. This is an element that can often be resolved satisfactorily with complainants.

This process does require a 'special requirements' assessment to be certain that there is nothing new that would suggest that misconduct proceedings might be appropriate. This would apply also to discovery of any of the gravity factors listed above. If special requirements or gravity factors were identified then the matter would be returned to PSD.

5.2 Dealing with Internal Misconduct

Matters of internal misconduct that amount to Gross Misconduct or contain one of the gravity factors will be investigated by PSD.

Low-level misconduct matters will be dealt with by the BCU. If necessary investigators will be appointed and notices served. It is expected that some of these cases will appear before Misconduct Meetings.

Misconduct matters that have any gravity factors are likely to be dealt with by PSD.

6.0 Training

Effective adoption of the legislation should lead to a change in culture within Merseyside Police. The underlying ethos of learning and development, with a shift away from blame and sanction, should provide us with the opportunity to increase public and internal confidence, be more cost effective and timely, and minimise bureaucracy yet retain adequate protection for officers.

The aim is to enable managers to intervene and resolve matters at the earliest stages. If necessary they will choose the appropriate process of UPP or Conduct if other managerial intervention, such as advice or PDP, is not suitable. Training our staff and in particular our supervisors, in the relevant subject areas is key.

There are a number of elements that require training delivery. This training has now been agreed with the Academy and outside training providers. Training for Meetings and Hearings will run in August and October. Training provided by the Academy will begin in October.

The training for Merseyside Police will be provided as follows:

1. **General awareness (for all police officers and staff) of new Regulations and Standards of Professional Behaviour** and identification of how to find more information and guidance. This will be provided as a distance learning module of approximately 25 minutes duration, via Breeze. We recommend that this be **mandatory** training for all Constables, including Special Constabulary.
2. **NPIA Modules 1 & 2.** Training for all Police Managers and Police Staff with management or supervisory responsibilities. NPIA has provided learning descriptors for modules 1 & 2. Following a bid to the Training Strategy Board, the Academy, supported by PSD will deliver required training. This is expected to be a combination of distance learning and 1-day classroom based input to focus on the necessary culture change.

3. **NPIA Modules 1 & 3.** Training for Professional Standards Department and HR advisors and managers. This will focus on how PSD and HR can provide advice, support and guidance in the application of the Regulations to managers and supervisors. NPIA has provided learning descriptors for modules 1 & 3. Following a bid to the Training Strategy Board, the Academy, supported by PSD will deliver required training. This is expected to be a combination of distance learning and 1-day classroom based input to focus on the necessary culture change.
4. **Misconduct Meetings.** Training for Chairs of Misconduct Meetings and appeal body. Chairs are expected to be at Chief Inspector level or Police Staff equivalent. This means that the appeal will be to Superintendent or Police Staff equivalent. This training will be delivered by external source – local Barristers Chambers.
5. **Misconduct Hearings.** Training for Chairs and members of Misconduct Hearings. This training will be delivered by external source expected – local Barristers Chambers.

7.0 - Unsatisfactory Performance Procedures (UPP)

7.1 Introduction

Regulations to deal with Unsatisfactory Performance by Police Officers were introduced in 1999. These were amended in 2003 to allow action under the Regulations for instances of Unsatisfactory Attendance as well as Performance issues. Within Merseyside Police they have been used more for Attendance issues than performance. Notwithstanding, for both criteria this is on a limited basis.

7.2 New Regulations

The new Regulations create very little change to the existing processes for the management of related issues. They include the following:

- Action under the Regulations should not be taken for 1 single instance of unsatisfactory performance.
- Action should be taken if usual management intervention has failed to address the matter.
- There are 3 stages to the formal procedures, which are to be followed incrementally unless:

The appropriate authority considers the performance (not attendance) of the police officer to be so unsatisfactory as to warrant the procedures being initiated at the third stage. This could be as a result of a single incident of “gross incompetence”

- Stages 1 and 2 will involve the issue of Action Plans and Improvement Notices for a period not more than 12 months where unsatisfactory performance has been established.
- Hearings under Stage 3 for which an officer may have their services dispensed with will be before a panel comprising of a member of ACPO rank and 2 Superintendents or Police Staff equivalent, one of whom should be an HR professional.
- The new Regulations provide a right of appeal at stages 1 and 2 which is not presently available. This will be in the case of Stage 1 to the 2nd Line Manager and for Stage 2 to a Senior Manager (Member of the Command Team). Stage 3 Appeals may be referred to the Police Appeals Tribunal.

7.3 Additional Provisions – Moving between Misconduct and Performance.

It will be possible, having commenced a misconduct investigation and following assessment, to refer the matter to be dealt with under UPP Procedures. Similarly, this may become apparent at the conclusion of any misconduct investigation. In such circumstances, the Appropriate Authority, (Ch. Insp. PSD) may refer the matter for action under UPP Procedures.

An initial assessment of Home Office Guidance relating to UPP indicates that in any case where the matter is referred having been commenced as a misconduct investigation, unless it may be regarded as gross incompetence, it will be dealt with at stage 1 of the UPP procedures.

7.4 Training

Training for Managers and Staff in respect of UPP Procedures will be incorporated in to that which is outlined at Section 6 of this document.