

The Royal Gibraltar Police

Evaluation of the force's progress in addressing the recommendations and areas for improvement from HMICFRS's 2016 and 2020 inspection reports

Contents

Summary	1
Introduction	3
Auditing of crime and incident recording	5
Recording of calls for service	8
Quality and supervision of investigations	10
Victims of crime	16
Identification, risk assessment and support of repeat and vulnerable victims	19
Demand management	23
Daily demand and matching resource to demand	26
Future demand	29
Professional standards	32
Integration of the Code of Ethics	32
Promotion of the code of ethics policy	33
Establishment of ethics champions and an ethics committee	34
Abuse of position for a sexual purpose	36
Notifiable associations and business interests	37
Role models	39
Leadership style and culture	41
Gifts and hospitality	42
Vetting	42
Counter corruption	44
Understanding of the level of risk of corruption	44
Counter corruption capability	45

Reporting systems	46
Workforce knowledge of corruption risks and signs of corruption	47
Annex A: The RGP’s progress in addressing the 2016 and 2020 recommendations and areas for improvement	48
Annex B: New recommendation	54
Annex C: Glossary of abbreviations	55

Summary

This is the third inspection of the Royal Gibraltar Police (RGP) that we have conducted in the last six years.

In 2016, we conducted an inspection of leadership, crime management, demand and resources. In our report of that inspection we identified areas for improvement (AFIs).

In 2020, we inspected:

- the progress the force had made in addressing our AFIs; and
- the force's legitimacy.

In the first part of [our report on the 2020 inspection](#) we expressed concern that the force had made slow progress. We also found that the force had only fully addressed one of the 2016 AFIs. And we made five recommendations related to the issues we had identified in 2016.

In the second part of that report, we highlighted nine new AFIs and made five recommendations. These were to help the force better promote ethics, fairness and standards.

In 2021, the commissioner of the RGP and the Gibraltar Police Authority (GPA) invited us to evaluate the force's progress in addressing:

- the outstanding AFIs from the 2016 report; and
- the recommendations and AFIs from the 2020 report.

We are pleased to report that the RGP has made good progress since 2020.

The force's senior leadership team has prioritised addressing our recommendations and AFIs. This is part of its efforts to improve the force's effectiveness, efficiency and legitimacy. It appointed officers to lead work on each of our recommendations and AFIs. It also set up a new governance procedure. This has allowed it to oversee progress and implement change more effectively.

Officers and [staff](#) across the force have worked hard to address our recommendations and AFIs. We recognise that this increased their workload at a time when the pandemic dramatically increased demands on the force. However, the work they have done to address our recommendations and AFIs has significantly improved the effectiveness and efficiency of the force in many areas. The force has implemented six of the ten recommendations and partially implemented the other four. It has also

addressed 14 of the 15 outstanding AFIs and has partially addressed the other one. We summarise our findings on the force's progress against the 2016 and 2020 recommendations and areas for improvement in [Annex A](#).

However, some problems remain. In particular, the force needs to continue to improve the range of support it provides victims and how it supervises investigations.

We make one new recommendation in this report. The force's ICT platform continues to be slow and unreliable. It hinders the efficiency of various tasks undertaken by officers across the force, including recording, auditing and governance. We therefore recommend that the Government of Gibraltar and the RGP should replace the existing ICT platform with one that is more suitable for the RGP's needs.

Introduction

About HMICFRS

His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) independently assesses the effectiveness and efficiency of police forces and fire and rescue services in the public interest. We conduct statutory inspections of police forces and other law enforcement agencies in England and Wales. We also inspect police forces in some British Overseas Territories and Crown Dependencies on invitation.

In preparing our reports, we ask the questions that citizens would ask. We publish the answers in an accessible form, using our expertise to interpret the evidence and make recommendations for improvement.

Our commission

In 2021, the commissioner of the RGP and the GPA invited us to inspect the RGP. We agreed terms of reference and a methodology before conducting the fieldwork between 18 and 22 April 2022.

This is the third inspection of the RGP that we have conducted in the last six years. Our terms of reference were to evaluate the force's progress in addressing:

- the outstanding areas for improvement from our [2016 report](#); and
- the recommendations and areas for improvement from our [2020 report](#).

About the RGP

The RGP is the oldest Commonwealth police force outside the UK. It was formed in 1830, more than 20 years before the inception of Her Majesty's Inspectorate of Constabulary. There are 251 police officers in the force and 40 police staff who are directly employed by the Government of Gibraltar.

It isn't the only policing body in Gibraltar. The Gibraltar Defence Police is a force that guards and enforces law on Ministry of Defence installations in Gibraltar. There is also a Joint Provost and Security Unit, which enforces military law.

The RGP is a small force. So, we don't compare it directly with other forces, or grade it.

Methodology

We conducted the fieldwork for this inspection in April 2022. We:

- interviewed staff at all levels of the force;
- attended management meetings and staff briefings;
- consulted other law enforcement and criminal justice organisations;
- spoke with public sector and community representatives; and
- met with the GPA and the Gibraltar Police Federation (GPF).

We also analysed data and documents, including a self-assessment that the force provided. And we audited a series of its crime investigation files.

Auditing of crime and incident recording

Our findings in 2016

In our [*Royal Gibraltar Police: An inspection of leadership, crime management, demand and resources*](#) report, we reported several administrative errors with the RGP's crime and incident recording. These included the following:

- Some records had the wrong crime classification.
- The outcome of an investigation wasn't always updated.
- Certain crimes were filed as detected when they were marked undetected, and vice versa.
- Some records were submitted later than the counting rules policy allowed.
- Some records didn't include important information concerning the needs of victims.
- In some instances, the matter shouldn't have been recorded as a crime.

At that time, the records department sergeant audited crime reports every few months. But their audit didn't review specific areas, such as high-risk crime (for example, some sexual offences).

We highlighted this as an area for improvement:

2016 area for improvement

By July 2016, the commissioner should augment the existing arrangements for crime recording by establishing and beginning operation of a comprehensive system for auditing crime records. Audits should be conducted regularly and led by a senior officer.

Our findings in 2020

In our [*The Royal Gibraltar Police inspection 2020*](#) report, we reported that auditing of crime and incident recording was still an area for improvement. We highlighted the following:

- There were still problems with the quality of crime records.
- The RGP didn't dip-sample (review a random selection of) reported incidents, such as disturbances, to check if they should be recorded as a crime.

- The force had appointed an experienced investigator and supervisor as crime desk manager. He conducted daily reviews of all crimes recorded, cancelled and closed in the previous 24 hours. But he hadn't completed the relevant [College of Policing](#) training needed to perform robust crime recording audits. And when he was absent, no audits or checks took place. Instead, the checks had to be done on his return.

This led to us identifying a new area for improvement:

2020 area for improvement

The lack of resilience for the Royal Gibraltar Police crime desk manager position is an area for improvement. The Royal Gibraltar Police's senior leadership team should appoint a deputy crime desk manager to conduct audits and checks during long-term absences.

Our findings in 2022

The RGP has addressed the areas for improvement

The RGP has made considerable progress in this area.

Resilience of the crime desk manager

The force increased the resilience of the crime desk manager role (now retitled the force crime registrar (FCR)) by appointing a deputy. We were pleased to find that the FCR and their deputy aren't reallocated to other roles. This allows them to focus on their main duties.

Training

The FCR has received the relevant College of Policing training. This has improved the scope and quality of his oversight and auditing. The pandemic prevented the FCR deputy from attending training, but this is now scheduled for September 2022. In the interim, the FCR has provided on-the-job training.

Auditing

The FCR and their deputy have increased the frequency and scope of their audits.

They review every crime report that is recorded and provide a final review again prior to a crime report being filed. They check each report:

- complies with the National Crime Recording Standard; and
- reflects what has been recorded in the incident logs.

The FCR has also introduced half-yearly auditing of incident logs. The audits' sample size is sufficient for the FCR to draw conclusive judgments about the quality of incident logs that have been updated by officers.

The FCR produces quarterly management data, which he sends to the assistant commissioner. But the force hasn't developed a governance process to provide regular and formal oversight of both crime and incident recording.

Education of the workforce

The appointment of a deputy has given the FCR more time to educate and support officers and address the administrative errors that we found in 2016. This should help improve the standards of crime and incident recording.

Recording of calls for service

Our findings in 2020

We audited incident reports and watched how the RGP's officers recorded incidents on the computer-aided dispatch (CAD) system, which runs on Cyclops, the RGP's ICT platform. We weren't convinced that officers recorded all calls for service on the CAD system. We saw officers recording calls on paper, which they didn't then transfer onto the CAD system. These included calls where the force dispatched officers to attend the scene.

The force has a clear policy on the recording of calls for service. But staff and supervisors in the [control room](#) followed it inconsistently.

This prompted us to make a new recommendation:

2020 recommendation

With immediate effect, the Royal Gibraltar Police's senior leadership team should make sure that all calls for service are recorded on the force's Computer Aided Dispatch system.

Our findings in 2022

The RGP has partially implemented this recommendation

The RGP can't accurately tell whether officers record all calls for service on the CAD system. To do so, it would need to know how many calls for service it receives but the telephony system doesn't record this. It records only the total number of incoming calls, including those that shouldn't be recorded on the CAD system.

In the absence of this data, a superintendent listened to all calls to the control room for a period in 2021. This allowed him to estimate the proportion of calls that were calls for service. He then compared the estimated total number of calls for service against the total number of CAD logs produced by officers. This showed that officers recorded most calls on the CAD system, which is an improvement on the performance seen in our 2020 inspection.

From late 2022, RGP's telephony system will be updated, and all calls will be audio recorded. Once this happens, the force plans to dip-sample calls to check that officers have entered them onto the CAD system. It will also assess the quality of these entries. This will be incorporated into current quality assurance processes, which involve inspectors checking incident logs and crime files daily. (See below, in the section [Supervision and review during investigations](#).)

In the interim, the force has reminded officers of their responsibility to record information on the CAD system. All control room officers we spoke with knew they had to record details of calls on the CAD system.

This process is also supervised. Crown sergeants oversee the control room and check that officers record calls on the CAD system. In terms of authority, crown sergeants are senior sergeants.

Quality and supervision of investigations

Our findings in 2016

We reviewed a sample of the RGP's investigation files. We saw some examples of good investigations and high-quality decision making, but also examples of poor investigative work. Sergeants weren't conducting robust supervision of all investigations. We saw many cases where they hadn't performed regular supervisory checks and many cases where officers hadn't created investigation plans.

We concluded that, without more effective supervision, the force wouldn't be able to assure the quality of all investigations. We reported that the force needed to improve, in order to bring offenders to justice as promptly as possible and provide higher levels of victim care.

We highlighted this as an area for improvement:

2016 area for improvement

By October 2016, the commissioner should ensure that robust arrangements for the supervisory oversight of investigations are introduced. These arrangements should include the creation of investigation plans, regular supervisory checks and constructive challenge to decisions by officers concerning investigations.

Our findings in 2020

Our 2020 report included findings from a case file review we conducted during our inspection. This examined:

- whether investigatory supervision had improved; and
- if it had, whether the quality of investigations had improved.

We found that:

- supervision by sergeants and inspectors had improved since 2016; and
- response officers usually conducted effective early evidence collection when initially attending crime scenes.

But:

- when uniformed officers were allocated a case to investigate further, supervisory support was often lacking;
- enhanced supervisory checks were delaying case files being sent to the state prosecutor (Crown Counsel) – these delays worsened when the Crown Counsel returned files with points of correction that supervisors should have found; and
- the force hadn't provided all officers who investigate or supervise criminal investigations with enough training or continuous professional development.

Delays and omissions happened more often in case files prepared by uniformed officers from response teams than in those prepared by officers from specialist units. Specialist investigators (for example, from the criminal investigation department (CID) and the [public protection unit](#)) had investigative experience and generally the time to complete case files. In contrast, officers from response teams were generally less experienced at investigating crime, which was but one of many work demands they had to manage.

We highlighted this as a cause for concern and made the following recommendation:

2020 recommendation

By 1 August 2020, the Royal Gibraltar Police's senior leadership team should set clear expectations in policy for supervisors about the frequency and depth of supervision needed. In addition, supervisors should be trained where necessary. Inspectors should carry out monthly dip-sampling of investigations to provide assurance that these expectations are met.

Our findings in 2022

The RGP has addressed the 2016 area for improvement. The RGP has partially implemented the 2020 recommendation. The force still needs to implement a process so that monthly dip-sampling takes place

Setting clear expectations for supervisors about the frequency of supervision

The RGP's senior leadership team has set clearer expectations for supervisors about the frequency of supervision. The force's new crime investigation policy (2021) states that supervisors should review each case:

- at the time it is allocated to the officer in charge (OIC) of the case; and
- no later than monthly intervals thereafter.

While all investigations should be supervised effectively, it is especially important that this happens for investigations conducted by inexperienced OICs. The force policy reflects this. It states that in cases where the OIC is a probationer, their supervisor must conduct weekly reviews.

The policy also mandates that the supervisor conduct their monthly and (if applicable) weekly reviews face to face with the OIC.

Setting clear expectations for inspectors and managers about the frequency of reviews

The crime investigation policy outlines how often inspectors and managers should review cases. It says that:

- inspectors will review all investigations after three months;
- the chief inspector (or a more senior manager) will dip-sample any investigations still live after six months; and
- there should be a follow-up every three months thereafter.

Inspectors must also review all investigations within 24 hours of them starting (see below, in the section [Supervision and review during investigations](#)).

Setting of clear expectations about the scope of supervision

The force has given sergeants guidance about the scope of their supervision. The crime investigation policy includes a 35-point supervisors' checklist for primary investigations and a 14-point supervisors' checklist for secondary investigations to guide supervisors' work.

Adherence to policy and guidance

We found that detective sergeants in specialist investigation units generally conduct regular supervision and oversight of their OICs' cases. As in 2020, we found that supervisors in these units had a detailed understanding of the cases under investigation.

Sergeants in the file preparation unit also supervise their OICs' cases well. We found the unit's two sergeants and five experienced uniform investigators work closely together, with weekly reviews of investigation plans.

However, we found that investigations conducted by response officers (also known as shift officers) aren't always supervised well.

Response sergeants have a wide range of responsibilities. They perform various specific roles including custody sergeant and force incident manager. This reduces the time they have to supervise their officers, including officers' investigations. One sergeant told us that he reviews cases in the first couple of days of an investigation. But he's unable to provide much oversight between then and the 30-day

point, as “one-to-one time with probationers is difficult to come by”. This is of concern, as the RGP has a very inexperienced pool of uniformed officers. As of June 2022, 39 percent of response constables are probationers. Another 6 percent have two to three years’ service.

Response officers corroborated the sergeant’s testimony. Some told us their supervisors don’t perform one-to-one supervision. And constables told us that they don’t receive much support from their sergeants.

We also found that the force’s current operating model has reduced inspectors’ oversight of response sergeants’ work. The force doesn’t have enough inspectors to assign one to each response shift. Instead, each inspector acts as response duty inspector for one week in every fourteen. When they conduct this role, they retain their duties from their main role (for example, CID or public protection). Consequently, the inspectors tend to be less able to oversee sergeants than they used to be. The RGP also has a crown sergeant for every shift. (A crown sergeant is senior to other sergeants and junior to inspectors.) Since the force adopted its ‘floating inspector’ model, crown sergeants are responsible for overseeing each shift.

Training for supervisors

The RGP has improved supervisor training. It has given all sergeants leadership training and given them presentations about how they should review investigation plans. The force also expects inspectors to identify sergeants’ training gaps and provide specific training where required. However, this is more difficult now that inspectors only conduct the response inspector role infrequently.

Dip-sampling of investigations by inspectors

The RGP’s senior leadership team decided against dip-sampling investigations. Instead, it has told inspectors to quality assure all new incident reports and new investigations every day. The inspectors follow a template that sets out what they need to do for each investigation. This includes checking whether officers have:

- recorded the victim’s contact details;
- assessed the [vulnerability](#) of victims effectively; and
- created an adequate investigation plan.

This process allows inspectors to review the quality of the initial investigative activity and highlight any other work that’s required. We recognise the work involved in quality assuring every investigation. This provides confidence in the way investigations are being carried out. The force may wish to revisit this approach once it is satisfied that investigative standards have improved.

All the inspectors we asked told us that they contact the OIC to do additional work if their checks identify problems. There was a consensus that due to the ‘floating inspector’ model, they usually can’t check whether an OIC has completed their

assigned tasks. They also can't readily find out whether other inspectors have previously told the OIC to do the same thing. To compound this problem, not all tasks are recorded on Cyclops. We would encourage the RGP to make sure that all actions allocated to officers are recorded on this platform.

Supervision and review during investigations

The introduction of the inspectors' quality assurance process is beneficial. But it doesn't monitor what happens after the first 24 hours of an investigation. Inspectors don't review investigations again until they have been running for three months. And a chief inspector only reviews cases after six months.

In the past 2 years, only 29 percent of investigations reached 3 months, and only 6 percent reached 6 months. We were also told that chief inspectors don't always review cases after six months because Cyclops is difficult to use and doesn't send them reminders.

Therefore, unless sergeants regularly review their officers' cases – which appears inconsistent in response teams – there is still a lack of supervision of response officers' investigations after the first 24 hours.

During our inspection, [senior officers](#) acknowledged this. They agreed that they need to improve supervision and oversight of investigations after the first 24 hours and before the 3-month point. However, the force is yet to develop a process to address this.

Quality of investigations

Our 2016 area for improvement and 2020 recommendation focused on improving the supervision of investigations. But their aim was to improve the quality of such investigations.

In 2020, we found that officers weren't regularly writing investigation plans for their cases. We are pleased to report that this has changed. In May 2022, the force told us that officers create investigation plans for all new investigations that need them.

Despite this, the quality of some investigations is still poor. The RGP conducted a randomised dip-sample of cases. This found inadequate investigative casework and evidence in 44 percent of investigations completed between January and March 2022. These cases were all investigated by uniformed officers. Also, some senior managers from other criminal justice agencies told us that the quality of uniformed officers' investigations is generally worse now than it was three years ago. They explained there are frequent problems with the timeliness and quality of cases.

These problems appear to be confined to investigations performed by uniformed officers, who often, as we have said, have less time, are less well supervised and have the least experience. Senior managers from other agencies told us that officers in specialist investigation units (especially the [domestic abuse](#) and [safeguarding](#) teams) generally conduct very good investigations.

Victims of crime

Our findings in 2020

We reported that the RGP needed to do more to make sure that victims of crime get the service they need. We highlighted the following:

- Response officers often struggled to find time to regularly update victims about the progress of investigations.
- Officers lacked guidance on the service they should provide victims. Gibraltar's [Victims in Criminal Proceedings Regulations 2015](#) sets out a range of victim entitlements but isn't specific enough to guide officers and omits important elements of the [Code of Practice for Victims of Crime in England and Wales](#).
- Officers rarely recorded details of victim contact on Cyclops.
- The RGP didn't monitor the quality of service it provided to victims.

We made the following recommendation:

2020 recommendation

By 1 August 2020, the Royal Gibraltar Police's senior leadership team should adopt the Code of Practice for Victims of Crime and conduct victim surveys.

Our findings in 2022

The RGP has partially implemented the recommendation. It has yet to adopt the Code of Practice for Victims of Crime, as this hasn't been ratified by the Ministry for Justice. The force is already considering an interim policy

Code of Practice for Victims of Crime

Since our last inspection, the RGP with the Gibraltar Courts Service, the Gibraltar Ministry for Justice and the Gibraltar Customs Service has developed a code of practice for victims of crime. In May 2021, it completed the draft *Victims in Criminal Proceedings Code of Practice*. It is broadly in line with the updated [Code of Practice for Victims of Crime in England and Wales](#), which was published in 2020. The Gibraltar Ministry for Justice had yet to ratify the draft. When it is finally

introduced, it will establish a regulatory framework for agencies to work together to help victims. Without it, such involvement is difficult.

The draft outlines the RGP's responsibilities for victim care. Many of these responsibilities aren't dependent on co-operation from other agencies, or on the Government of Gibraltar ratifying the code of practice. They include:

- providing victims with a written acknowledgement that their crime has been recorded, including the basic details of the offence;
- telling victims how often they will receive updates on the status of the case following discussion with the police;
- providing victims with updates on their case and telling them when important decisions have been taken;
- offering victims interviewed by the police the opportunity to be accompanied by a person of their choice (unless to do so would prejudice the proper handling of the investigation);
- offering victims of sexual violence, gender-based violence or domestic violence the opportunity to have a person of the same sex conduct the interview; and
- giving victims the right to make a victim personal statement.

First victim contact

The force has created a victim support team (VST) to address the first two responsibilities listed above. VST officers:

- establish which crimes were recorded in the past 24 hours;
- send the victims of these crimes a written acknowledgement of the reporting of the crime; and
- agree with the victim how often they will receive updates.

Moving responsibility for first victim contact from uniformed officers to the VST has improved first victim contact. (Specialist investigators retain responsibility for contacting victims in the cases that they investigate.) A recent internal review confirmed that officers (usually from the VST) contacted all victims of crime soon after crimes had been reported and were agreeing the frequency and method of future updates.

Victim contact during investigations

Despite the work of the VST, the RGP still doesn't maintain adequate contact with all victims. OICs retain responsibility for updating the victim at agreed times and at several milestones during an investigation. However, in May 2022, an internal RGP audit revealed that OICs weren't contacting victims often enough in 18 percent of cases.

Other victim care responsibilities

The RGP's senior managers could have instructed officers to fulfil the full range of responsibilities outlined in the code of practice while it is still in draft. It hasn't done this. Rather than creating a victims of crime policy that clearly sets out officers' responsibilities, the force has decided to use the code of practice as a policy once the Government of Gibraltar ratifies it, but not before. The force gave us reasons for their decision, but we believe they should introduce a policy without delay.

The force's crime investigation policy (2021) doesn't mention the responsibilities relating to interviews (listed above as points four and five). And it states that:

“the OIC must ensure compliance with the new Victims in Criminal Proceedings Code of Practice (INSERT HYPERLINK HERE) [sic] which describes what the investigator needs to do and when at each stage of an investigation.”

RGP managers acknowledged to us that the policy should be clearer.

Victim personal statements

Like the England and Wales code of practice, the draft Gibraltar code of practice includes a section on victim personal statements (VPSs). However, unlike the England and Wales code, it doesn't convey the right for victims to be “provided with information about the [VPS] process by the police when reporting a crime”.

The force's crime investigation policy doesn't instruct officers to do this either. It just says that officers should “consider a [VPS] in appropriate cases”, without providing detailed guidance about this.

While officers gave victims the opportunity to provide a VPS in some of the cases we reviewed, this doesn't happen routinely. Also, when we asked uniformed constables about VPSs, only a few told us that they understood what a VPS was, what its purpose was and how they should record it. Inspectors also expressed their confusion about when officers should take a VPS. One told us that guidance in this area “still needs development and needs to be clearer”.

Regardless of the current status of the code of practice, the force should introduce policy on this matter immediately.

Victims' surveys

The RGP introduced a victims of crime survey in September 2021. It is based on surveys used by English and Welsh forces.

The RGP sends victims a survey form at the end of proceedings. Again, this is in line with practice in England and Wales.

Identification, risk assessment and support of repeat and vulnerable victims

Our findings in 2016

In our 2016 inspection report we highlighted that:

- officers didn't receive specific training to identify vulnerable victims;
- the force lacked robust systems through which officers could identify vulnerable or repeat victims; and
- during our case file review, we didn't find evidence that officers consistently considered the vulnerability of victims.

We highlighted this as an area for improvement:

2016 area for improvement

By July 2016, the commissioner should define in policy and procedures how vulnerable and repeat victims will be identified, how risks to them will be assessed and how appropriate support will be provided. Operation of the policy and procedures should begin as soon as possible thereafter.

Our findings in 2020

We reported this was still an area for improvement. The force had made some progress, including introducing [THRIVE](#) and [DASH risk assessments](#). But there was still much more to do.

We specifically highlighted that:

- the RGP didn't use a corporate, standard definition of vulnerability;
- it lacked a comprehensive process to routinely risk assess all potentially vulnerable victims at first response;
- the CAD system didn't highlight whether a caller was a repeat or vulnerable victim; and
- when children repeatedly went [missing](#) from home, officers were adding details of the new incident to an old report, rather than creating a new one.

We made the following recommendation:

2020 recommendation

By 1 August 2020, the Royal Gibraltar Police's senior leadership team should develop a corporate definition of vulnerability and develop processes to make sure officers identify any vulnerabilities of the victims, witnesses, and suspects they encounter, and make appropriate interventions.

We also outlined how [domestic violence protection orders \(DVPOs\)](#) and [domestic violence protection notices \(DVPNs\)](#) provide police officers in England and Wales with more powers to protect victims of domestic violence. There were no equivalents in Gibraltar. Consequently, the RGP and the courts couldn't give victims of domestic violence the same protection available to those in England and Wales.

We made the following recommendation:

2020 recommendation

By 1 November 2020, the Royal Gibraltar Police's senior leadership team should evaluate all reported domestic violence incidents in Gibraltar. Based on this data, the most appropriate agency should establish whether DVPOs and DVPNs would have provided valuable additional protection for victims. If the evaluation shows they would have done so, the Government of Gibraltar should consider pursuing changes to legislation to enable their introduction as soon as possible thereafter.

Our findings in 2022

The RGP has addressed the 2016 area for improvement. The RGP has implemented both of the 2020 recommendations

The RGP's vulnerability lead has contacted and visited counterparts in England and Wales to learn about good practice there. This has shaped the work the force has done to address the area for improvement and the recommendations. The force has also set up a dedicated domestic abuse team.

Definition of vulnerability

The RGP now uses a single definition of vulnerability. It adopted the College of Policing's definition:

“A person is vulnerable if, as a result of their situation or circumstances, they are unable to take care of or protect themselves or others from harm or exploitation.”
([Introduction to vulnerability-related risk](#))

It then updated its THRIVE process to align it to this new definition and incorporated the definition into all other relevant policies and documents. The officers we interviewed showed that they understood this definition.

Officers' assessment of vulnerability at first response

The RGP now instructs officers to assess vulnerability at first response. In April 2021, the force introduced the Victim Is Vulnerable Assessment (VIVA) process (first developed by an English force). Officers must conduct a VIVA when they attend incidents and record the result on Cyclops. This should help the force to identify vulnerable and repeat victims.

The force has provided officers with instruction, guidance and training on the VIVA process. The RGP's senior managers circulated a force order that told officers a VIVA "must be completed in all cases". The force's vulnerability lead gave a presentation about the VIVA process at officers' training days. And he has given officers remedial one-to-one training, as needed. The officers we interviewed understood the VIVA process and why it is important.

The force's crime investigation policy instructs supervisors to make sure that officers have completed VIVAs. And, since early 2022, inspectors check whether officers have conducted VIVAs and evaluate the quality of assessments, as part of their case file assurance process. (See above, in the section [Supervision and review during investigations](#).)

By introducing the VIVA process, the RGP now assesses the vulnerability of most victims and witnesses at first response. This is a significant improvement on the situation we found in 2020. In May 2022, officers had conducted VIVAs in 93 percent of cases where it was required.

Missing from home reports

The force has made good progress in dealing with the problem of officers updating old reports when recording a new person reported as missing. All the missing-from-home reports we audited had been recorded on new forms.

Domestic abuse protection notices (DAPNs) and domestic abuse protection orders (DAPOs)

The RGP has worked closely with the Government of Gibraltar and public sector agencies to enshrine the protection of victims of domestic abuse in law.

However, at the time of our inspection, domestic abuse offences weren't defined in Gibraltar law. In November 2020, the Minister for Justice and Equality published [C04-2020 Command Paper on a draft Bill for an Act to make provision in relation to domestic abuse and for connected purposes](#). This set out the Government's proposed new offence of 'domestic abuse'. And it outlined new powers for dealing with domestic abuse, including [DAPNs](#) and [DAPOs](#). The six-month consultation period for the

command paper ended in May 2021. But, at the time of writing, the Government hasn't passed the legislation. Until this happens, the force can't use DAPNs and DAPOs. The force has continued to reiterate the importance of this legislation to Government. In the interim, the force has made greater use of other elements of the Crimes Act 2011, which gives the courts the power to impose civil orders to support victims. However, this is more cumbersome than DAPNs and DAPOs and isn't applicable in all domestic abuse situations.

The precise powers of the new Gibraltar orders and notices are unclear. There are housing shortages in Gibraltar. Therefore, the Government may decide that it is impractical to introduce a DAPO that would force people out of their homes, as they would have nowhere else to go.

Demand management

Our findings in 2016

We reported that:

- the force didn't prioritise its approach to daily demand based on an assessment of threat and risk of harm to individuals;
- much of the work that the force carried out wasn't a policing matter, including work suitable for others such as traffic enforcement officers and customs officers; and
- daily demand was stretching the force's resources, particularly in the force's response teams.

We advised that prioritising demand on a more formal basis would help the force better manage, and maybe even reduce, demand. This would require being clear with the public and with officers about the types of calls that must be dealt with first (and the types of calls that would be better dealt with by other public bodies).

We identified demand management as an area for improvement:

2016 area for improvement

By October 2016, the commissioner should agree with the Authority a policy and procedure to prioritise – and in so doing, match – resources to demand, particularly for response teams.

Our findings in 2020

We reported that the force hadn't fully addressed the area for improvement. THRIVE had given the force a procedure to prioritise response team resources. But we highlighted that the force should do more to manage demand. This included better assessment of risk and working more with partner organisations.

Assessment of risk

We highlighted that officers in the force's control room weren't consistently applying the force's procedures for recording THRIVE assessments. They didn't always record their reasons for grading calls. This meant the force couldn't assure itself that calls were being properly assessed and dealt with.

Working with others

We reported that police officers were still spending lots of time doing work that other agencies could do, for example:

- routinely directing traffic at the border;
- responding to marine callouts for other agencies with marine capabilities;
- guarding remand prisoners at court on behalf of the prison service, in certain circumstances; and
- escorting vehicles with abnormal loads.

We suggested that the force should examine the potential for allowing civilian staff to perform some roles or handing some responsibilities to other government bodies.

We called on the RGP to do further work on demand management, supported by the Government of Gibraltar, the Governor of Gibraltar and the GPA.

Our findings in 2022

The RGP has addressed the area for improvement

The force has made good progress in prioritising its approach to daily demand based on an assessment of threat and risk of harm to individuals.

Assessment of risk

The RGP's senior leadership team has conducted a lot of work to make it easier for call handlers to complete THRIVE assessments. It created a working group to assess how officers were using THRIVE. This examined how the force received, managed, dealt with and recorded calls. Drawing from the working group's findings, the force made some changes. These included:

- introducing touchscreen monitors; and
- updating policies.

The force also introduced new processes to check that call handlers complete the assessments. And sergeants check CAD logs more regularly to make sure officers are accurately recording all calls for service. These processes are complemented by the dip-sampling of CAD logs that inspectors conduct. Inspectors then record information from these checks in a quality control document. This is aligned with the force's policing plan and is designed to identify risks and subsequent learning opportunities.

The FCR's deputy also checks the CAD system each day, to make sure that crimes recorded there are then recorded in Cyclops' crime module.

Finally, the force has introduced a crime incident manager role. A crown sergeant usually performs this role. It involves:

- taking responsibility for significant incidents; and
- co-ordinating resources and providing directions to effectively manage the police response until relieved by the duty inspector.

These initiatives have had the desired effect, and we were pleased to find that all the incident records we reviewed included a THRIVE assessment.

Working with others

The commissioner of the RGP has shown a commitment to reducing the demand on the force. He has written to other public sector organisations, including HM Customs Gibraltar, Gibraltar Borders and Coastguard Agency, Environmental Agency Gibraltar, Gibraltar Health Authority, Gibraltar Department of Transport and British Forces Gibraltar, to highlight:

- the resourcing pressure the force is working under;
- the duties that police officers routinely conduct on behalf of the other organisations; and
- the force's intention to stop deploying its resources to these.

The commissioner reiterated the need for other organisations to take responsibility for some of those duties that had inappropriately fallen to the RGP in the past. He also pledged the RGP's support for such matters when it was absolutely needed.

Consequently, the force reduced the size of its marine section, with the Royal Navy, Gibraltar Defence Police and HM Customs Gibraltar taking on some of their roles. It has also closed its diving unit and its dog section, transferring its drug dogs to HM Customs Gibraltar.

The RGP has also stopped policing frontier queues, except for when long queues cause congestion in the city centre. Department of Transport parking management officers now manage the queues at the border. This has helped the force to redeploy police officers to response teams and better balance the workload.

We interviewed senior leaders from these organisations, who told us that the service they provide hasn't been reduced as a result of RGP's realignment. They all also described their good working relationships with the RGP's senior managers and officers.

Daily demand and matching resource to demand

Our findings in 2016

We reported that the RGP didn't base its shift system on its understanding of demand. Instead, the number of response officers available for deployment (to deal with daily demand) was the same across a 24-hour period, irrespective of demand.

We highlighted this as an area for improvement:

2016 area for improvement

By October 2016, the commissioner should establish an effective way to assess how busy the force is likely to be, by using a range of tools to understand daily calls for service and patterns in their demand. This should include: analysing calls for service and recorded crime figures; identifying peak or seasonal demand; and understanding factors affecting demand such as major events. Once this information is available, judgments should be made about the optimum shift patterns and the numbers of officers needed for the shift patterns.

Our findings in 2020

We reported that the RGP's understanding of the full range of its demand was still an area for improvement. We recognised that the force had evaluated when it receives most calls for service and amended shift patterns and officer numbers accordingly. But we highlighted that until it has a complete understanding of the full range of demands it faces, it can't assure itself that it has the right staff with the right skills in the right place to meet those demands.

Understanding of current demand

We reported that shortcomings in the RGP's ICT systems limit its ability to comprehensively understand demand. It also hadn't updated its demand analysis since 2016. Without this, it didn't have a comprehensive understanding of all its demands, which include:

- specialist investigations;

- safeguarding;
- hidden and under-reported crimes;
- internal demand;
- bureaucracy; and
- demands that others should deal with.

Matching of resource to demand

The force had made progress in matching resource to the demand it was aware of. It had changed officers' shift patterns to achieve more capacity at peak times. This gave officers a more manageable working arrangement while keeping a sustainable 24/7 police response capability.

The new shift pattern had succeeded in making more officers available when demand is greatest.

But we found the following:

- Officers were stretched and carrying heavy workloads, despite the force's new shift system and improved approach to prioritisation.
- The force was using a high level of overtime – more than an extra 10 percent of salaries – to fill gaps in capacity, with many officers often working more than 12 hours a day.
- Constables and supervisors from every department were sent to cover other duties, for example football match policing, dealing with traffic queues at the border, and Servator patrols. (Project Servator patrols are unpredictable, highly visible police deployments, designed to disrupt a range of criminal activity, including terrorism.) This is because of the small size of the force.

As a result, we found that important work, such as preventing and detecting crime, was suffering.

We concluded that the RGP's understanding of the full range of its demand was still an area for improvement.

Our findings in 2022

The RGP has addressed the area for improvement

The force has made good progress in matching resource to demand.

Understanding of current demand

Although there continue to be significant problems with the RGP's ICT systems, the force has been able to compile more accurate and timely data to map demand across the force. It has also been able to recognise patterns, peaks, seasonal variations and factors that cause demand.

In 2020, the force carried out a strategic demand analysis, which has led to a far better understanding of demand. It also completed a risk assessment similar to the [management of risk in law enforcement \(MoRiLE\)](#) used in England and Wales. This assessment detailed staff and skill shortages, equipment and wellbeing needs, and resilience levels in each department.

We would encourage the force to review their assessment regularly.

Matching of resource to demand

There was a consensus from all interviewees that response teams are understaffed and that other staff are needed to supplement them. Although the force has made progress in revising shift patterns, the benefits have been affected by increases in sickness and a need to catch up on training following the pandemic. However, the removal of non-police activity such as frontier checks means that fewer officers and supervisors from every department are taken away from their routine work to cover other duties.

Future demand

Our findings in 2016

We reported that the RGP lacked:

- a comprehensive understanding of likely future demand; and
- a plan to address future demand in terms of money, recruitment and structures, apart from a proposal for a new police headquarters.

We also found that future training plans were based on filling skill gaps brought about by retirements over a five-year period, rather than on the capabilities and capacity the force would need in future.

We highlighted this as an area for improvement:

2016 area for improvement

By October 2016, the commissioner should compile a comprehensive prediction of future demand. This should be used to define the capacity and capability the force will need, which will enable the creation of plans for funding, skills, structure, estates, information and communication technology and other equipment.

Our findings in 2020

We reported that the RGP's understanding of future demand is still an area for improvement.

The force hadn't compiled a comprehensive prediction of future demand (part of the 2016 area for improvement). We reported that it should update its strategic threat and risk assessment (STRA) to plan for the skills, structures and ICT it will need in future.

Future growth

The force had secured funding to increase police officer numbers to cope with growing demand. It received approval to recruit 25 new police officers and to reassign the duties conducted by 25 police officers to civilian members of staff.

Understanding of future demand

The force hadn't analysed likely future demand, or how it would shape the skills and capabilities it needs in its workforce. Without a comprehensive understanding of its current workforce skills, it couldn't plan to fill any future gaps.

We reported that it should:

- design simple, effective processes to help structure and measure its training and training needs; and
- develop overarching plans to give leadership and direction so that senior leaders and the GPA can oversee and manage the change effectively.

ICT infrastructure and support

We highlighted that ICT problems lessen the RGP's ability to effectively meet demand. Software ran slowly, and access to servers and the internet was also slow and unstable.

We also highlighted the following:

- A phased implementation of a new ICT system had been slower than expected and hadn't achieved the expected benefits.
- The force didn't have an ICT strategy to guide future planning and investment.
- The force's decisions tended to be ad hoc and based on the funding available in the coming year, rather than part of a wider strategy to future-proof policing.
- The force had bought many [body-worn video](#) cameras, but a significant number were broken.

Our findings in 2022

The RGP has addressed the area for improvement

The RGP's senior managers' understanding of likely future demand has improved, but it is still limited. The force conducted an organisational risk assessment in 2021 to assess future demand. This found that only one unit in the force had produced an evidence-based forecast of its demand. It also found that only 13 units were likely to meet future demand. It concluded that for 22 units, this would potentially pose harm to the public and for 24, it could cause organisational harm to the RGP.

The force intends to use the data from the organisational risk assessment to establish how it will meet future funding, skills, structure, estates, ICT and other equipment needs. However, we found no evidence of this happening yet.

The force has also updated its STRA, which describes the demands placed on the force and the resources available to meet those demands. Data from this STRA then informs the force's first [force management statement](#). The force aims to use this statement to predict its future resource requirement. It will also use it to help it assess the skills and capabilities it needs in the future. This process has recently started, and we encourage the RGP to use this analysis to assess how many officers and staff it will need in future.

ICT infrastructure and support

The RGP's Cyclops ICT platform continues to be slow and unreliable. It hinders the efficiency of various tasks carried out by officers across the force, including recording, auditing and governance. Everyone we spoke with told us about problems they have when using the system. It is one of the most inefficient that we have seen and is in urgent need of replacement.

New recommendation

By 31 December 2023, the Government of Gibraltar and the Royal Gibraltar Police should replace the existing ICT platform with one that is more suitable for the Royal Gibraltar Police's needs.

Professional standards

Integration of the Code of Ethics

Our findings in 2020

In 2020, the RGP replaced its code and values document with a new code of ethics policy taken from the [College of Policing Code of Ethics](#).

However, it hadn't reviewed and updated its procedures and policies to reflect the new policy. For example, the force didn't integrate it into the appraisal system or recruitment process. We found force policies that contradict the policy. And senior managers told us that some aspects of it couldn't work in Gibraltar.

We made the following recommendation:

2020 recommendation

By 1 August 2020, the Royal Gibraltar Police's senior leadership team should amend the Royal Gibraltar Police's code of ethics policy to reflect the force's operational environment and make sure that the revised policy is incorporated into other policies and processes.

Our findings in 2022

The RGP has partially implemented the recommendation

Amendment of the code of ethics policy to reflect the RGP's operating environment

The RGP code of ethics policy remains a partial verbatim copy of the College of Policing's code. This hasn't been tailored to reflect the force's operational environment. The policy still references England and Wales legislation, rather than Gibraltar law. And elements of the policy still can't work in Gibraltar. Consequently, the force hasn't resolved the problems we reported in 2020.

An example of this is the difference that exists between the discipline regulations of Gibraltar and those of England and Wales. This prevents the force from enacting the parts of the policy that relate to misconduct and discipline. In 2018, senior RGP officers asked the Government of Gibraltar to amend the discipline regulations to bring them in line with those in England and Wales. These regulations haven't yet been amended. We agree that this legislative change would be beneficial. However, in the interim, the force should have adapted its policy for its operational environment.

Incorporation of the code of ethics policy into other policies

The force has added reference to the code of ethics policy at the start of most of its policies.

Incorporation of the code of ethics policy into procedures

The RGP has incorporated the code of ethics policy into its recruitment and promotion processes. These processes now consider candidates' ethical behaviour as part of their selection criteria. The force has also used the policy to justify dismissing unsuitable recruits. Previously, the force had found it difficult to dismiss such people.

Promotion of the code of ethics policy

Our findings in 2020

We reported that the senior leadership team had started to promote the new policy. Many officers knew about it but didn't understand how to apply it to their work. They felt they would benefit from a clearer explanation of how to link police practice with accepted behaviour.

Apart from police officers, all other staff working for the RGP are civil servants, employed by the Government of Gibraltar. They told us they didn't see the relevance of the code of ethics policy and the force hadn't promoted it to them.

We highlighted this as an area for improvement:

2020 area for improvement

The Royal Gibraltar Police workforce's understanding of the Code of Ethics is an area for improvement. Its senior management team should make sure that the code of ethics policy is embedded across the entire workforce.

Our findings in 2022

The RGP has addressed the area for improvement

The RGP's senior leadership team has done a lot to promote the code of ethics policy to officers in the force:

- The commissioner and other senior managers give briefings about the code of ethics policy at all officers' training days and then brief all officers who miss the training.
- The commissioner and the [professional standards department \(PSD\)](#) brief all new recruits about the code of ethics policy during their basic training.
- Police officers have regular training days where they discuss code of ethics policy issues.
- The force's senior leadership regularly circulates information about the code of ethics policy in force orders.
- Code of ethics policy posters are displayed around the police station.
- The code of ethics policy is displayed on computer screensavers.

There was a consensus among the officers we interviewed that, since our last inspection, there has been a constant, clear message from senior managers about the importance of the code of ethics policy and ethical behaviour. We found that, in general, officers had a good understanding of the policy.

However, the force still needs to do more to increase understanding of the policy among police staff (civil servants). Police staff receive force orders, so they have seen messages about the policy there. The force also told us that police staff attended presentations about the policy. But some of the police staff we interviewed said that they hadn't received any training. Some police staff, including some who are 'ethics champions' ([see below](#)), told us that the policy didn't apply to them. Police staff would benefit from receiving bespoke training, like that provided to officers. This would help them understand how the policy should reasonably apply to all members of the RGP.

Establishment of ethics champions and an ethics committee

Our findings in 2020

We suggested that the force should consider:

- setting up a network of ethics champions, representing officers and staff across all departments;
- making the code of ethics policy an agenda item in senior leadership meetings; and
- forming a committee focused exclusively on ethics and equality.

We highlighted this as an area for improvement:

2020 area for improvement

Embedding the Code of Ethics in the Royal Gibraltar Police's activity is an area for improvement. The force's senior leadership team should consider establishing a network of ethics champions, representing officers and staff across departments, who would meet to share learning. Additionally, the force should consider having the Code of Ethics as an agenda item in senior management meetings and form a committee that focuses exclusively on ethics and equality.

Our findings in 2022

The RGP has addressed the area for improvement

Ethics champions

The RGP's senior managers have set up a network of 12 ethics champions. They are a diverse group, representing officers and staff across departments. They:

- share learning;
- promote the code of ethics policy and ethical behaviours;
- act as a voice for others in raising ethical issues or concerns; and
- meet regularly to discuss recent ethical issues.

Independent ethics committee

In 2021, the RGP also established an independent [ethics committee](#) (IEC), comprised of unpaid volunteers, including a member of the GPA. Forces and [police and crime commissioners](#) in England and Wales have established similar bodies to enhance trust and confidence in the police by providing independent oversight and scrutiny of forces' actions and culture.

We welcome the formation of the committee. But its remit is currently not well defined; consequently, the ethics champions are unsure what they should refer to the IEC. This may undermine or inhibit the value the IEC brings to considering some ethical issues.

There is also scope for the IEC to expand its role. Unlike similar independent committees that work with police forces in England and Wales, it doesn't scrutinise the force's body-worn video footage or policies, the force's use of stop and search, or its promotion processes. The IEC members would require training to make sure they were confident to demonstrate such scrutiny. But its independent perspective on such issues would be beneficial for the force, and the public of Gibraltar.

The force needs to help shape the IEC's role and provide it with meaningful ethical issues to consider. This could also include appointing a non-voting police officer to the IEC to provide support and advice. Otherwise, the role of the IEC will fade and become less relevant and effective.

Senior leadership meetings

The force has added the code of ethics policy as a standing agenda item at its command team meetings. This is in line with our recommendation.

Abuse of position for a sexual purpose

Our findings in 2020

The RGP hadn't recognised the potential for its employees to abuse their position for a sexual purpose (establishing or pursuing an improper sexual or emotional relationship with a person who they come into contact in the course of their work who may be vulnerable to an abuse of trust or power). Unlike most forces across the UK, it hadn't briefed or trained its workforce to raise awareness of the issue.

We highlighted this as an area for improvement:

2020 area for improvement

The Royal Gibraltar Police workforce's understanding of abuse of position for a sexual purpose is an area for improvement. The Royal Gibraltar Police's senior leadership team should provide more guidance to its workforce to increase understanding of the risks posed by abuse of position for a sexual purpose.

Our findings in 2022

The RGP has addressed the area for improvement

The RGP's senior leadership team has done a lot of work to improve the workforce's understanding of abuse of position for a sexual purpose.

It introduced its *Abuse of position for a sexual purpose or emotional gain and professional boundaries policy* in 2021, with the aim to:

“prevent RGP staff forming improper sexual or emotional relationships, raise awareness of the signs, symptoms and triggers in order to deter, prevent and take positive action for the public and colleagues.”

The policy defines abuse of position for a sexual purpose, vulnerability and professional boundaries. It also lists warning signs of such abuse and outlines staff's responsibility to report concerning behaviour to the PSD.

The force's senior managers have also educated the workforce about the policy. They have given presentations to all staff on the risks posed by abuse of position for a sexual purpose. These presentations now form part of the rolling training programme. The force also repeatedly issues reminders about the policy in force orders.

The training and messaging have been successful. All the officers and staff we asked were aware of the policy and what they need to do.

The force's PSD is also planning to expand the scope of the policy to include relationships between people who work for the force. This would be a very useful addition to its suite of ethics policies.

Notifiable associations and business interests

Our findings in 2020

We reported that the RGP didn't check whether its officers or staff had associations with people who could present a corruption risk. Forces in England and Wales require officers and staff to submit details to the PSD of these associations – often referred to as notifiable associations – that meet certain criteria. The PSD then considers any risks and manages them accordingly.

However, in the RGP, officers and staff didn't have to declare such notifiable associations. Some senior managers and officers told us it would be impractical. Interviewees told us that Gibraltar's small and close-knit population means that everyone knows everyone else. So, trying to apply such a policy would be unworkable, bureaucratic and ineffective. We disagreed with this opinion.

We also reported that the RGP wasn't routinely recording, checking and reviewing the business interests of officers and staff.

We highlighted these issues as an area for improvement:

2020 area for improvement

The Royal Gibraltar Police's management of business interests and notifiable associations is an area for improvement. The force's senior leadership team should produce business interests and notifiable associations policies that mandate recording of such issues and regular review of the registers on which they are recorded.

Our findings in 2022

The RGP has addressed the area for improvement

Notifiable associations/compromised persons

The RGP produced a compromised persons policy in May 2020. This defines the term 'compromised person' and requires officers and staff to report any associations with such people. It also explains the processes that the PSD uses to assess, review and check any reports.

The force has successfully promoted the policy. All the officers and staff we asked about notifiable associations were aware of the new policy and their obligations. Officers told us that:

- the policy is easy to find, clear and straightforward;
- they have received training on the new policy, which forms part of a rolling training programme;
- they have received regular reminders in force orders;
- the forms are easy to complete; and
- the PSD is very helpful in answering people's questions about what associations they need to record.

Most officers we interviewed welcomed the introduction of the compromised persons policy. Many felt that it would help protect them if they were subject to false allegations of corruption. Unlike in 2020, none of the officers we interviewed in this inspection voiced any objections to the policy's introduction.

The RGP's PSD has developed processes to review the reported notifiable associations register. We examined the register and found it was well maintained and up to date. The PSD told us that the form officers use to self-report doesn't provide them with all the information they need. A redesigned reporting form will be introduced.

Business interests

The force produced a business interests policy in June 2020. It instructs officers and staff to report such interests and sets out the reporting, assessment, review and monitoring processes. However, the policy lacks sufficient clarity about whether people should report certain activities as a business interest (for example, renting out property).

The force has made sure that the workforce knows what it needs to do to comply with the policy. It provided training to all officers and staff. This now forms part of the rolling training programme. The force's senior leadership team has also circulated regular reminders about the policy in force orders.

The training and messaging have been successful. All the officers and staff we asked were aware of the policy and what they need to do.

The workforce appears to routinely record business interests. We examined the force's business interests register and found it was well maintained and up to date.

However, the approval process for business interests is overly bureaucratic, with too many stages, when compared to that for forces in England and Wales. After an officer submits a business interest application it is reviewed by:

1. their line manager; then
2. their divisional commander; then
3. the head of the PSD; then
4. the commissioner of the RGP; then
5. the GPA; and then
6. the RGP's human resources team.

It is then approved by the Government of Gibraltar's human resources team.

Unsurprisingly, some officers raised their concerns with us that business interest applications are rarely approved. This is because the process is so lengthy and there are delays in securing the final approval from the Government of Gibraltar's human resources team.

Role models

Our findings in 2020

We reported that some staff had told us that the phrase 'firm leadership' was occasionally used to describe management behaviours that, in a small number of cases, may have amounted to bullying.

We examined the last two staff surveys conducted by the GPF. Many officers had a perception that some senior officers sometimes behave in an unacceptable manner when dealing with their staff. Whether true or not, this perception was a cause for concern.

We made the following recommendation:

2020 recommendation

With immediate effect, the Royal Gibraltar Police's senior leadership team should produce an anti-bullying statement and improve the force's processes to prevent bullying.

Our findings in 2022

The RGP has implemented the recommendation

The RGP has produced a clear anti-bullying statement. Its 2020 bullying at work policy states:

“The Royal Gibraltar Police (RGP) is firmly committed to creating a working environment free from bullying, harassment and unlawful discrimination; developing a culture of respect, dignity and fairness for all.”

It goes on to say:

“All police officers and police staff have a right not [to] be bullied and bullying, victimisation and harassment will not be tolerated at any level. Bullying, harassment and victimisation between those in the service/employment will not be tolerated on any grounds or in any circumstances, whether in the course of day-to-day duties, or away from the workplace and/or outside of working hours.”

The commissioner of the RGP has also made anti-bullying statements in force orders, training events and other meetings.

In 2020, the force introduced a new grievance procedure. This was designed to help improve bullying prevention and to address bullying incidents. The procedure was explained in a new grievance policy, which also includes a useful step-by-step guide for officers and staff.

The force has also looked to reinforce the anti-bullying message through new guidance. The bullying at work policy includes useful examples of what is and isn't bullying. It also helpfully explains the difference between a 'good and demanding manager' and a 'bullying management style'.

The force has also trained all officers and staff on the new bullying at work and grievance policies. It also arranged for a local anti-bullying charity to give presentations to the workforce.

Many staff and officers told us that they had received the training and were confident they could report bullying through the grievance process. Some junior officers and staff also told us that the force “has been strong in pushing out its anti-bullying messaging” and “police officers are more conscious in the way they treat each other”. Others said that recent leadership training had positively influenced the behaviour of supervisors and “there is a far more trusting atmosphere” than there was in 2020.

However, after our visit, the GPF published its annual staff survey, conducted between 1 March 2022 and 11 April 2022. Seventy-seven percent of officers completed the

survey, and its findings are in sharp contrast to what we found during our inspection. The survey reported that:

- almost one fifth of officers (32 officers) who completed the survey said they had been bullied at work in the past year; and
- over one third of officers who completed the survey said they had seen a colleague being bullied at work in the past year.

These findings are clearly worrying.

Leadership style and culture

Our findings in 2020

We reported that many junior officers perceived that some senior officers were sometimes too ready to apportion blame when something goes wrong. We were unable to determine whether there is a 'blame culture' within the force, and if there is, the extent to which it exists. We were pleased that the force's leadership recognises the perception of a blame culture and has invited the GPF to raise any examples with it.

We highlighted this as an area for improvement:

2020 area for improvement

The leadership training provided to the Royal Gibraltar Police workforce is an area for improvement. Operational exchange at inspector and chief inspector rank should be encouraged with British police forces for up to six months. This will allow managers to experience different management styles in other forces, as well as bring skilled managers into the force from England and Wales.

Our findings in 2022

The RGP has partially addressed the area for improvement

The RGP's senior managers liaised with their counterparts in British Overseas Territories and some English police forces to try to arrange operational exchanges and secondments. The pandemic has delayed this. At the time of our visit, the force hadn't developed any exchange programmes with other forces that would allow inspectors and chief inspectors to experience different management styles.

In the interim, the force arranged for a UK-based trainer to provide accredited leadership training to officers in supervisory and managerial roles. Following the training, each student completed a 90-day leadership and development plan with mentoring support and received coaching from the trainer. The participants we

interviewed found this training very useful. It will now form the basis of further continuous professional development.

The force sought development opportunities for specific roles during the pandemic and continues with this work.

Gifts and hospitality

Our findings in 2020

We found that, while the RGP had a system for monitoring gifts and hospitality, it wasn't being used routinely.

We highlighted this as an area for improvement:

2020 area for improvement

The Royal Gibraltar Police's management of gifts and hospitality is an area for improvement. The Royal Gibraltar Police's senior leadership team should make sure that its gifts and hospitality registers are monitored regularly to make sure staff are complying with force policy.

Our findings in 2022

The RGP has addressed the area for improvement.

The RGP has improved its management of gifts and hospitality. The force's PSD conducts monthly audits of the gifts and hospitality registers. It reports the findings to the senior leadership team.

The force's senior leadership team often uses force orders to remind the workforce about the gifts and hospitality policy.

The force's PSD has also conducted integrity tests to gauge the workforce's compliance with the policy. These initially showed that some people weren't reporting gifts. So, the PSD provided more training to officers and staff. The force now includes training on the gifts and hospitality policy in its rolling training programme.

Vetting

Our findings in 2020

We reported that the RGP didn't have a consistent vetting process. Vetting happened when police officer recruits entered the force but was sometimes disjointed because it was conducted by several units. Additional vetting was in place for some specialist posts but wasn't systematic.

We highlighted that, regardless of the special circumstances in Gibraltar, the force must be able to properly vet applicants. It must also be able to vet officers and staff seeking promotion or moving post, where it is necessary to do so. And we made the following recommendation:

2020 recommendation

By 1 August 2020, the Royal Gibraltar Police's senior leadership team should review the force's vetting procedures. It should consider adopting the College of Policing's Authorised Professional Practice on vetting.

Our findings in 2022

The RGP has implemented the recommendation

The RGP has created a vetting team of three officers. They have all received suitable vetting by UK forces for these new roles and they have been trained in accordance with the College of Policing's [Authorised Professional Practice](#) on vetting.

The team has sought to build on good practice in England and Wales. It has developed a strong relationship with an English police vetting unit and received mentoring support from its manager. This has informed the development of the force's new vetting policy, which is in line with the Authorised Professional Practice on vetting.

The team has identified all the roles that require additional vetting and has determined the level and frequency of vetting needed for each.

It has also established robust vetting procedures for new applicants. The procedures require police officer and police staff applicants to submit a vetting form alongside their job application. There are different forms for each of the vetting levels. This should remove the possibility of anyone joining the RGP who hasn't achieved the minimum vetting needed for the post.

At the time of our inspection, the force hadn't started vetting people. It has invested in vetting software, which will store all vetting-related data and automatically flag when an individual's vetting needs review or renewal. However, the introduction of this software has been delayed until September 2022, due to technical difficulties with the installation and the pandemic. Understandably, the force has delayed vetting until the software is in place. Starting before this would have meant developing a temporary system and later exporting records from that system to the new software.

The force has made good progress in response to this recommendation, and it is ready to start vetting once the software is live.

Counter corruption

Understanding of the level of risk of corruption

Our findings in 2020

We reported that the issue of corruption, even at a low or subconscious level, didn't appear to be a concern for the force.

The force didn't fully understand its exposure to the risk of corruption. The PSD lacked the resources and expertise needed to develop such an understanding or monitor and mitigate the threat.

We highlighted this as an area for improvement:

2020 area for improvement

The Royal Gibraltar Police's understanding of the corruption risks it faces is an area for improvement. The Royal Gibraltar Police's senior leadership team should compile a comprehensive, local, counter corruption threat assessment and control strategy to evaluate and manage the full range of risks to the integrity of its organisation.

Our findings in 2022

The RGP has addressed the area for improvement

The RGP, with help from North Wales Police, has produced a counter corruption threat assessment and a control strategy. The force's PSD liaised with police professional standards units in England and their counterparts in other British Overseas Territories and Crown Dependencies to learn what corruption risks they face and how they tackle them.

The counter corruption threat assessment and the control strategy are comprehensive documents. The former outlines a broad range of corruption risks that the force faces. In relation to each of the identified risk areas, the latter includes recommendations to prevent and deter criminality, enforce the law and gather [intelligence](#).

Counter corruption capability

Our findings in 2020

We reported that the RGP was unable to identify individuals who were corrupt or susceptible to corruption. It lacked processes (commonplace in England and Wales) to collect intelligence, analyse workforce data and disciplinary records, or carry out integrity testing. This represented a risk to the force.

The force was also unable to effectively audit police systems. We suggested that it periodically audits the Cyclops platform, and outlines what is and isn't acceptable use of police systems.

We also highlighted that the force should review its PSD, and in particular its counter corruption capability. It should make sure there are enough resources to promote ethical standards; challenge poor behaviours; and monitor and target corruption. We suggested the following:

- This review should set clear expectations for governance and leadership.
- The force may benefit from external expertise and could identify examples of good practice from forces in England and Wales.

We made the following recommendation:

2020 recommendation

By 1 November 2020, the Royal Gibraltar Police's senior leadership team should determine the best model for providing a counter corruption capability to proactively identify and pursue employees who are corrupt or susceptible to corruption.

Our findings in 2022

The RGP has implemented the recommendation

The RGP's senior leadership team has decided to increase the size of the force's PSD, to include a small counter corruption team.

However, even with more staff, the PSD still lacks the resources to do much counter corruption work. This is due to competing demands, including dealing with a backlog of misconduct investigations. PSD officers try to spend one day a week on counter corruption work and have started some proactive activities. Nevertheless, they don't have time to increase the scope of this activity to the level that they feel is required. It is anticipated that the update to the misconduct regulations will help line managers

to deal with minor conduct issues, which would give the PSD more time to focus on counter corruption.

The slow processing speed of Cyclops, the force's ICT platform, also hampers PSD's counter corruption work.

Reporting systems

Our findings in 2020

We reported that the RGP lacked a confidential reporting system, commonplace in England and Wales. Such systems give the workforce a way to anonymously report issues of concern, related to corruption, poor behaviour, bullying or abuse of power for sexual gain.

We made the following recommendation:

2020 recommendation

By 1 November 2020, the Royal Gibraltar Police's senior leadership team should develop a method of anonymously and confidentially reporting integrity issues, either by telephone or email or both. To avoid scepticism and distrust about the anonymity of reporting systems, it would be beneficial if this facility were managed independently.

Our findings in 2022

The RGP has implemented the recommendation

The RGP has established a system to help officers and staff to report integrity issues anonymously and confidentially. This has gone through three iterations since our last inspection. Initially, the PSD created an anonymous email system. It then replaced this with a system that allowed officers and staff to send anonymous reports via a desktop application. Later, at the time of our inspection, the PSD was working with an ICT company to develop an anonymous reporting link on the force intranet. This system, called Bad Apple, is now live and anonymises reports effectively.

PSD officers have given briefings on the system at officers' training days and circulated information in force orders. All the officers and staff we asked about anonymous reporting were aware of reporting systems.

Since Bad Apple has gone live, the PSD has updated the training and issued new instructions in force orders. The force has promoted the new anonymous reporting process, but we have yet to see evidence that the workforce has confidence in it.

This new process now complements other ways of reporting police wrongdoing such as:

- sending unsigned paper documents to the PSD; or
- reporting allegations through third parties, such as the GPF.

Workforce knowledge of corruption risks and signs of corruption

Our findings in 2020

We reported that the RGP's workforce lacked a thorough understanding of corruption risks and signs of corruption.

We highlighted this as an area for improvement:

2020 area for improvement

The Royal Gibraltar Police workforce's understanding of corruption is an area for improvement. The Royal Gibraltar Police's senior leadership team should provide a briefing about corruption risks and signs of corruption to the workforce, based on the College of Policing's APP on counter corruption.

Our findings in 2022

The RGP has addressed the area for improvement

The RGP's senior leadership team has provided briefings to the workforce about corruption risks and signs of corruption.

In particular, the chief inspector of operations gave a presentation to all uniformed officers about corruption risks. PSD officers have also given presentations about corruption risks at officers' training days. And the force's senior managers have regularly circulated information to the workforce in force orders about corruption risks. This is all in addition to the training and guidance that the force has provided officers and staff about specific risks (such as gifts and hospitality, business interests and the abuse of position for sexual gain).

All the officers and staff we asked were aware of the corruption risks and signs of corruption.

Annex A: The RGP's progress in addressing the 2016 and 2020 recommendations and areas for improvement

Auditing of crime and incident recording

2016 area for improvement

By July 2016, the commissioner should augment the existing arrangements for crime recording by establishing and beginning operation of a comprehensive system for auditing crime records. Audits should be conducted regularly and led by a senior officer.

The RGP has addressed this area for improvement.

2020 area for improvement

The lack of resilience for the Royal Gibraltar Police crime desk manager position is an area for improvement. The Royal Gibraltar Police's senior leadership team should appoint a deputy crime desk manager to conduct audits and checks during long-term absences.

The RGP has addressed this area for improvement.

Recording of calls for service

2020 recommendation

With immediate effect, the Royal Gibraltar Police's senior leadership team should make sure that all calls for service are recorded on the force's Computer Aided Dispatch system.

The RGP has partially implemented this recommendation.

Quality and supervision of investigations

2016 area for improvement

By October 2016, the commissioner should ensure that robust arrangements for the supervisory oversight of investigations are introduced. These arrangements should include the creation of investigation plans, regular supervisory checks and constructive challenge to decisions by officers concerning investigations.

The RGP has addressed this area for improvement.

2020 recommendation

By 1 August 2020, the Royal Gibraltar Police's senior leadership team should set clear expectations in policy for supervisors about the frequency and depth of supervision needed. In addition, supervisors should be trained where necessary. Inspectors should carry out monthly dip-sampling of investigations to provide assurance that these expectations are met.

The RGP has partially implemented this recommendation.

Victims of crime

2020 recommendation

By 1 August 2020, the Royal Gibraltar Police's senior leadership team should adopt the Code of Practice for Victims of Crime and conduct victim surveys.

The RGP has partially implemented this recommendation.

Identification, risk assessment and support of repeat and vulnerable victims

2016 area for improvement

By July 2016, the commissioner should define in policy and procedures how vulnerable and repeat victims will be identified, how risks to them will be assessed and how appropriate support will be provided. Operation of the policy and procedures should begin as soon as possible thereafter.

The RGP has addressed this area for improvement.

2020 recommendation

By 1 August 2020, the Royal Gibraltar Police's senior leadership team should develop a corporate definition of vulnerability and develop processes to make sure officers identify any vulnerabilities of the victims, witnesses, and suspects they encounter, and make appropriate interventions.

The RGP has implemented this recommendation.

2020 recommendation

By 1 November 2020, the Royal Gibraltar Police's senior leadership team should evaluate all reported domestic violence incidents in Gibraltar. Based on this data, the most appropriate agency should establish whether DVPOs and DVPNs would have provided valuable additional protection for victims. If the evaluation shows they would have done so, the Government of Gibraltar should consider pursuing changes to legislation to enable their introduction as soon as possible thereafter.

The RGP has implemented this recommendation.

Demand management

2016 area for improvement

By October 2016, the commissioner should agree with the Authority a policy and procedure to prioritise – and in so doing match – resources to demand, particularly for response teams.

The RGP has addressed this area for improvement.

2016 area for improvement

By October 2016, the commissioner should establish an effective way to assess how busy the force is likely to be, by using a range of tools to understand daily calls for service and patterns in their demand. This should include: analysing calls for service and recorded crime figures; identifying peak or seasonal demand; and understanding factors affecting demand such as major events. Once this information is available, judgments should be made about the optimum shift patterns and the numbers of officers required for the shift patterns.

The RGP has addressed this area for improvement.

2016 area for improvement

By October 2016, the commissioner should compile a comprehensive prediction of future demand. This should be used to define the capacity and capability the force will need, which will enable the creation of plans for funding, skills, structure, estates, information and communication technology and other equipment.

The RGP has addressed this area for improvement.

Professional standards

2020 recommendation

By 1 August 2020, the Royal Gibraltar Police's senior leadership team should amend the Royal Gibraltar Police's code of ethics policy to reflect the force's operational environment and make sure that the revised policy is incorporated into other policies and processes.

The RGP has partially implemented this recommendation.

2020 area for improvement

The Royal Gibraltar Police workforce's understanding of the Code of Ethics is an area for improvement. Its senior management team should make sure that the code of ethics policy is embedded across the entire workforce.

The RGP has addressed this area for improvement.

2020 area for improvement

Embedding the code of ethics in the Royal Gibraltar Police's activity is an area for improvement. The force's senior leadership team should consider establishing a network of ethics champions, representing officers and staff across departments, who would meet to share learning. Additionally, the force should consider having the Code of Ethics as an agenda item in senior management meetings and form a committee that focuses exclusively on ethics and equality.

The RGP has addressed this area for improvement.

2020 area for improvement

The Royal Gibraltar Police workforce's understanding of abuse of position for a sexual purpose is an area for improvement. The Royal Gibraltar Police's senior leadership team should provide more guidance to its workforce to increase understanding of the risks posed by abuse of position for a sexual purpose.

The RGP has addressed this area for improvement.

2020 area for improvement

The Royal Gibraltar Police's management of business interests and notifiable associations is an area for improvement. The force's senior leadership team should produce business interests and notifiable associations policies that mandate recording of such issues and regular review of the registers on which they are recorded.

The RGP has addressed this area for improvement.

2020 recommendation

With immediate effect, the Royal Gibraltar Police's senior leadership team should produce an anti-bullying statement and improve the force's processes to prevent bullying.

The RGP has implemented this recommendation.

2020 area for improvement

The leadership training provided to the Royal Gibraltar Police workforce is an area for improvement. Operational exchange at inspector and chief inspector rank should be encouraged with British police forces for up to six months. This will allow managers to experience different management styles in other forces, as well as bring skilled managers into the force from England and Wales.

The RGP has partially addressed this area for improvement.

2020 area for improvement

The Royal Gibraltar Police's management of gifts and hospitality is an area for improvement. The Royal Gibraltar Police's senior leadership team should make sure that its gifts and hospitality registers are monitored regularly to make sure staff are complying with force policy.

The RGP has addressed this area for improvement.

2020 recommendation

By 1 August 2020, the Royal Gibraltar Police's senior leadership team should review the force's vetting procedures. It should consider adopting the College of Policing's Authorised Professional Practice on vetting.

The RGP has implemented this recommendation.

Counter corruption

2020 area for improvement

The Royal Gibraltar Police's understanding of the corruption risks it faces is an area for improvement. The Royal Gibraltar Police's senior leadership team should compile a comprehensive, local, counter corruption threat assessment and control strategy to evaluate and manage the full range of risks to the integrity of its organisation.

The RGP has addressed this area for improvement.

2020 recommendation

By 1 November 2020, the Royal Gibraltar Police's senior leadership team should determine the best model for providing a counter corruption capability to proactively identify and pursue employees who are corrupt or susceptible to corruption.

The RGP has implemented this recommendation.

2020 recommendation

By 1 November 2020, the Royal Gibraltar Police's senior leadership team should develop a method of anonymously and confidentially reporting integrity issues, either by telephone or email or both. To avoid scepticism and distrust about the anonymity of reporting systems, it would be beneficial if this facility were managed independently.

The RGP has implemented this recommendation.

2020 area for improvement

The Royal Gibraltar Police workforce's understanding of corruption is an area for improvement. The Royal Gibraltar Police's senior leadership team should provide a briefing about corruption risks and signs of corruption to the workforce, based on the College of Policing's APP on counter corruption.

The RGP has addressed this area for improvement.

Annex B: New recommendation

By 31 December 2023, the Government of Gibraltar with the Royal Gibraltar Police should replace the existing ICT platform with one that is more suitable for the Royal Gibraltar Police's needs.

Annex C: Glossary of abbreviations

Abbreviation	Full term
CAD	computer-aided dispatch
CID	criminal investigation department
DAPN	domestic abuse protection notice
DAPO	domestic abuse protection order
DVPN	domestic violence protection notice
DVPO	domestic violence protection order
FCR	force crime registrar
GPA	Gibraltar Police Authority
GPF	Gibraltar Police Federation
HMICFRS	His Majesty's Inspectorate of Constabulary and Fire & Rescue Services
ICT	information and communications technology
IEC	independent ethics committee
OIC	officer in charge
PSD	professional standards department
RGP	Royal Gibraltar Police
STRA	strategic threat and risk assessment
THRIVE	threat, harm, risk, investigation, vulnerability and engagement
VIVA	Victim is Vulnerable Assessment
VPS	victim personal statement
VST	victim support team

October 2022 | © HMICFRS 2022

www.justiceinspectorates.gov.uk/hmicfrs