

## FOI Disclosures December 2021

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This month we have responded to questions relating to the following topics:

- [Stonewall funding](#)
- [Outcome bias training](#)
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- [Operation Embley – whistleblowing allegations](#)
- [Stonewall membership](#)

If you require a full copy of any of the embedded attachments, please contact [Requestinfo@policeconduct.gov.uk](mailto:Requestinfo@policeconduct.gov.uk) quoting the reference number from the relevant response.

<b><u>Ref</u></b> <b><u>5023147</u></b> <a href="#">Back to top</a>	<b><u>Stonewall funding</u></b>
<b><u>Request</u></b>	<ol style="list-style-type: none"><li><i>1. In respect of each of the years 2015-2021, please confirm what funding has been provided to Stonewall by The Independent Office for Police Conduct</i></li><li><i>2. Please specify whether the funding in 1 above has been in the form of: (a) direct grants for unlimited purposes; (b) direct grants for limited purposes (in that event, stating the purpose); (c) payment for goods or services (specifying the relevant goods and services).</i></li><li><i>3. Where the funding in 1 above has been by way of payment for goods or services, please specify: (a) what analysis has been conducted to ascertain whether these goods or services meet contractual and/or legal requirements; (b) what contractual or other recourse exists to reclaim in respect of goods or services that are defective, substandard or delivered in contravention of the law; (c) what steps are being taken to seek recourse for any such contractual or legal shortfalls.</i></li><li><i>4. In respect of the payments referred to in 1 above, please state: (a) What criteria were applied in deciding to make payments by way of direct grants; (b) What tendering process was conducted with regard to provision of goods or services;</i></li></ol>

	<i>(c) What alternative suppliers of goods or services were considered.</i>
<b><u>Response</u></b>	<p>1. £3,000 for the period from 25/06/18-24/06/19 - Diversity Champions Membership (England Membership)</p> <ul style="list-style-type: none"> <li>• £6,000 for the period from 10/09/20-09/09/21 - Stonewall Diversity Champions Membership (including England &amp; Cymru)</li> <li>• £6,000 for the period from 07/10/2021-07/10/2022 Stonewall Diversity Champions Membership (including England and Cymru)</li> </ul> <p>2. (c) payment for goods or services (specifying the relevant goods and services). This was for Stonewall Diversity Champions membership.</p> <p>3. No formal analysis has been undertaken, we have and continue to receive the services expected.</p> <p>3(b) The IOPC have the right to terminate the subscription by writing to the supplier. There are a number of Terms and Conditions in which we have the right to do so, including if we have unreasonable satisfaction with the service.</p> <p>3(c) None.</p> <p>4(a) Not applicable.</p> <p>4(b) The IOPC engaged with the supplier directly and entered into a contract via a Single Tender Action.</p> <p>4(c) See responses above</p>
<b><u>Ref</u></b> <b><u>5023146</u></b> <a href="#">Back to top</a>	<b><u>Outcome bias training</u></b>
<b><u>Request</u></b>	<p><i>Could you please provide me with copies of any IOPC training materials concerning guarding against hindsight and outcome biases in investigative decision making, or alternatively confirm that no such training is delivered.</i></p> <p><i>Could you please provide me with copies of any guidance or policy documents concerning avoidance of hindsight and outcome biases in investigative decision making, or alternatively confirm that no such guidance or policy exists.</i></p>
<b><u>Response</u></b>	<p>We do not hold any information under the first part of your request because our training programme for operational staff does not include any training on this subject.</p> <p>In regard to the second part of your request we do not hold any relevant policy but our guidance to operational staff includes the information contained in the Annex to this letter, which forms part of</p>

our guidance on the drafting of investigation reports. This is the only guidance we hold under your request.

Annex: information from IOPC Operations Manual

**Avoiding bias in the report**

Care should be taken to avoid allowing bias to influence your analysis of the evidence. Failure to recognise bias in an investigation could impact on the determinations the DM reaches and may ultimately mask the real lessons to be learned. There are several types of bias, the following are common when analysing evidence:

- Outcome bias
- Hindsight bias
- Confirmation bias

**Outcome bias**

Outcome bias is the tendency to judge a past decision or action by its success or failure, instead of based on the quality of the decision made at the time. No decision maker knows for certain whether or not the future will turn out for the best following any decision they make.

If an incident leads to death it is often considered very differently and critically, compared to an incident that results in no harm, even where the incident or error is exactly the same.

To avoid the influence of outcome bias, the LI should evaluate the decision or action taken at the time it was taken and given what was known or going on at that time, irrespective of the success or failure of the outcome.

**Hindsight bias**

Hindsight bias is the tendency for people with the 'benefit of hindsight' to falsely believe, once all the facts become clear, that the actions that should have been taken to prevent an incident seem obvious, or that they could have predicted the outcome of an event.

**Confirmation bias**

Confirmation bias is the tendency to interpret evidence in a way that confirms the LI's pre existing beliefs or hypothesis. People are particularly likely to apply this bias when the evidence is ambiguous or might support a variety of hypotheses.

**Ref**  
**5023157**

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**Operation Coinage**

**Request**

*Please disclose your report for the investigation 'Operation Coinage', finalised on 23rd September 2021.*

	<i>This was an investigation into the actions/inaction of Cheshire Constabulary officers on 17th February 2019, following reports of offences in the Wilmslow area.</i>
<b><u>Response</u></b>	<p>A decision has been made to publish a summary of our investigation in line with our publication policy and this will appear on our website shortly once all relevant consultations and steps have been completed.</p> <p>We have decided that you are not entitled to the full investigation report at this time because it is exempt under sections 30 and 40 of the FOIA.</p> <p>In the case of information falling within the terms of section 30, we are refusing your request because the public interest in maintaining the exemption outweighs the public interest in disclosure.</p>
<b><u>Ref</u></b> <b><u>5023123</u></b> <a href="#">Back to top</a>	<b><u>Operation Embley – whistleblowing allegations</u></b>
<b><u>Request</u></b>	<p><i>Q1. When did Mr Veeran first report his Whistle blowing concerns to the IOPC?</i></p> <p><i>Q2 Did the IOPC refer Mr Veeran's Whistle blowing concerns to the Met Police DPS for an assessment of an indication of Misconduct?</i></p> <p><i>Q3 Did Mr Veeran provide the IOPC further information after the start of Operation Embley?</i></p>
<b><u>Response</u></b>	<p>We have interpreted question 1 as a request for the date on which the IOPC received Mr Veeren’s allegations.</p> <p>We can confirm that we hold information from which we could answer these questions but have decided that it is exempt under section 40(2) of the FOIA, which relates to personal information.</p> <p>Operation Embley investigated alleged corruption amongst senior officers in the MPS Directorate responsible for investigating police misconduct. The public has a strong interest in knowing whether those responsible for upholding and enforcing the law are maintaining the highest professional standards and in ensuring that they are properly held to account when there is evidence that they are not meeting those standards.</p> <p>While we accept that there is a legitimate interest in confirming the findings and outcomes of our investigation, we consider that disclosure of this personal data is not necessary for this purpose because it would not add significantly to the information available on our web site. We have already accounted for the progress and findings of Operation Embley in our published statements, which include confirmation that the investigation</p>

	<p>began in November 2017 and concluded in July 2020. Clearly these are less privacy intrusive means of meeting the need for transparency in this case.</p>
<p><b><u>Ref</u></b> <b><u>5023169</u></b> <a href="#">Back to top</a></p>	<p><b><u>Stonewall membership</u></b></p>
<p><b><u>Request</u></b></p>	<ol style="list-style-type: none"> <li>1) <i>How much money has the IOPC or IPCC paid to Stonewall since 2010? Please include membership of any programmes and payments to attend training or conferences organised by Stonewall, whether IOPC/IPCC staff members attended external events or Stonewall staff attended the IOPC/IPCC offices to lead events.</i></li> <li>2) <i>How many IOPC/IPCC staff have attended Stonewall training or conferences since 2010? It would be helpful to have this broken down into the number of staff each year.</i></li> <li>3) <i>How long has the IOPC/IPCC been a member of the Stonewall Diversity Champions programme?</i></li> <li>4) <i>Was membership of the Stonewall Diversity Champions programme scrutinised by IOPC/IPCC lawyers for compliance with the Equality Act 2010? If so, what was the outcome?</i></li> <li>5) <i>Has the IOPC committed to remaining a member of the Stonewall Diversity Champions programme? If so, for how long?</i></li> <li>6) <i>Has membership of the Stonewall Diversity Champions programme or any advice from Stonewall influenced any areas of IOPC/IPCC policy? If so, please provide a brief summary.</i></li> <li>7) <i>Is the IOPC committed to upholding the Equality Act 2010, particularly the protected characteristic of sex?</i></li> <li>8) <i>Is the IOPC aware that gender is not a protected characteristic under the Equality Act 2010?</i></li> </ol>
<p><b><u>Response</u></b></p>	<ol style="list-style-type: none"> <li>1) -£3,000 for the period from 25/06/18-24/06/19 - Diversity Champions Membership (England Membership) -£6,000 for the period from 10/09/20-09/09/21 - Stonewall Diversity Champions Membership (including England &amp; Cymru) -£6,000 for the period from 07/10/2021-07/10/2022 Stonewall Diversity Champions Membership (including England and Cymru)</li> <li>2) The IOPC does not hold this information.</li> <li>3) Since June 2018.</li> <li>4) No. Stonewall is aware of our commitment to diversity in employment and service delivery and they have accepted this condition.</li> <li>5) Our current membership commitment ends on 7 October 2022.</li> </ol>

	<p>6) Yes. Stonewall has provided advice on the IOPC Gender Identity policy and guidance and the Transitioning in the Workplace guidance.</p> <p>7) Yes. The IOPC is committed to upholding all protected characteristics set out in the Equality Act 2010.</p> <p>8) The IOPC does not hold recorded information relating to this particular matter.</p>
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