

Action the Civil Nuclear Constabulary has taken to communicate commitment to improve standards following the conclusion of the various culture related reviews

# Public documents/information about CNC culture

Below are the external documents, media articles, strategies and more that have been published outlining the work that the CNC has undertaken to inform the public, stakeholders and the media about what we are doing to both improve our culture, and make changes as recommended in various reviews and reports.

We have also carried out a huge amount of work internally to educate and inform our workforce and improve our culture using a number of different methods, including the intranet, Weekly Brief, face to face briefings, Managers' Toolkits, subject-specific briefing packs, Chief Constable's Headlines Call, vlogs from Chief and other Exec members, Senior Leaders Forum specifically dedicated to culture and more.

# Leadership, Performance and Standards



DCC Stephen Martin

The role of the Deputy Chief Constable (DCC) is to support the Chief Constable in leading the Constabulary. He assists in creating a vision, direction and culture for the force that builds public, stakeholder and organisational confidence and trust, all of which are vital in enabling the delivery of an effective policing service.

The DCC holds direct operational accountability for the delivery of the Constabulary's core role in protecting the nation's nuclear interests, as well as the CNC response to general policing duties in support of Home Office police forces. Of particular focus is the protection afforded by the vigilance of our role as an armed police service and in providing counter terrorism firearms support to Home Office forces at times of mutual aid, whilst always sustaining CNC's core strategic responsibilities to energy sector stakeholders.

The DCC has strategic oversight and responsibility for organisational performance, including delivering our three-year strategy efficiently and effectively through the CNC's delivery plan. He is also responsible for the vital area of Equality, Diversity and Inclusion (EDI), leading our EDI Governance Group to ensure we are an inclusive and supportive organisation, with a zero-tolerance approach to discrimination in any form. The EDI team looks forward to working with colleagues to deliver on the objectives set out in our new EDI Strategy published this year.

Professional Standards and Vetting are two other areas of responsibility resting with the DCC and both are of critical importance. We are fully committed to rooting out corrupt and criminal officers from our ranks, and are in the process of investing in both the capability and capacity of our Professional Standards Department. Policing can only legitimately exercise its functions with the confidence, trust, and co-operation of the public. We are determined to play our part in securing it.

With the high number of Authorised Firearms Officers in the CNC, training is always a priority area. We are accredited by the Police College with a National Firearms Training

Licence and use our expertise to train not just our own officers but those from some other forces. Currently, The DCC is leading on a review of our training departments to bring them under a more unified structure with greater quality assurance and ongoing evaluation. A new Training Strategy is being developed which will encompass not just our Firearms requirements but all other necessary training and professional development of our officers and staff. Our 'Initial Foundation Course' for new officers is being modified to meet the requirements of a Level 4 Apprenticeship, and a strategic partnership with an academic partner is being actively considered.

The CNC continually reviews how it does its business and seeks opportunities to improve utilising good practice, technology, and innovation. It is essential that our operational officers and staff are properly trained, equipped, and supported to deliver our mission. Every initiative that is developed enables us to be forward thinking, building and developing operational capability, delivering value for money and ensuring we are positioned and prepared to mitigate emerging threat and risk, keeping the public safe and placing our people at the heart of all that we do.



The <u>Annual Business Plan 2022/23</u> published, which gives details throughout about our culture, professionalism etc, but especially in the DCC's update on page eight

# The Strategic context

The UK Government has committed to new nuclear reactors as part of its British Energy Security Strategy, and the Energy Bill is under review in 2023.

The CNC will continue to be a national strategic asset, safeguarding the UK's civil nuclear sector whilst also contributing to the UK's wider policing and security operation. The UK energy landscape will alter significantly over the next two decades creating changing demands for protection and security. This will require the CNC to be agile and responsive and to manage its resources efficiently.

### Trust, Respect and Conduct

In common with the wider police service in the UK, CNC faces additional scrutiny of its organisational culture and conduct. During he past year CNC has been subject of a number of internal and external reviews and inspections.

The CNC volunteered to take part in the HMICFRS inspection into vetting, misconduct, and misogyny in the police service. All police forces were issued with 27 recommendations to deliver which were focused on the capacity and capability of force's vetting and professional standards departments.

It also recommended changes to misconduct processes and vetting practices. The report also highlighted shocking misconduct across the UK police service. The Angiolini Inquiry, a review of the career progression of the officer who murdered Sarah Everard, expects to report on part one of its review during 2023. The Baroness Casey review into the standards and culture of the Metropolitan Police Service delivered its final report in March 2023 and also contains learning for all forces to consider. It is vital that policing regains the trust of the public and its stakeholders and is open and transparent about where it must improve.

There will be a significant cost to building the capacity and capabilities of our professional standards and vetting teams required by the recent reviews into policing, and into the CNC specifically. We will need to identify savings in other areas so that the Site Licence Companies do not bear the bulk of these costs

The recommendations from all the reviews are embedded in this three-year strategy. CNC will drive and achieve an organisational culture in which everyone feels valued, included and respected. We have assessed the recommendations and areas for improvement and grouped them into five key themes to deliver in this Strategic Plan.



The <u>CNPA three-year Strategic Plan</u> covers culture, professionalism and the reviews we have undergone at various points, with a whole section devoted to the public trust and confidence and work undergone in the strategic context section (page seven) and Goal 3 also covering this and the work undertaken by the CNC to improve culture (page 21)

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## Foster and maintain a unified and inclusive culture which supports an engaged and diverse workforce

To deliver our Mission successfully, we need the right people with the right attitude and aptitude to fulfill the challenging role of officers and staff; supported with the right training, equipment and motivated by value-based leadership. We must achieve a culture where we are all working together to bring out the best of each individual and team.

CNC volunteered to take part in the recent HMICFRS inspection of vetting, misconduct and misogyny in the police service. CNC were reviewed as part of the Angiolini Inquiry into the officer responsible for the horrific murder of Sarah Everard. CNC also commissioned two external reviews of its culture and gender. The recommendations from all the reviews have been grouped into five key themes. Equality, Diversity and Inclusion, a review of our Human Resources department provision, vetting and professional standards, training, and a full policy review for delivery during this Strategic Plan period.



### **Activities:**

#### 3.1 Standards and Behaviour

Set and rigorously apply the standards and behaviour required of a policing service. We will enhance our professional standards and vetting functions and capability with a focus on proactive intervention and the development of a prevent plan.

We will deliver the 27 recommendations for all forces and chief constables set out in the HMICFRS inspection into vetting, misconduct, and misogyny. This will require a significant uplift in the capacity and capability of our vetting team and professional standards department (PSD). We commissioned a review of our PSD provision by British Transport Police, to advise us on the scale of changes we need to make to bring us into line with other non-Home Office forces. We will also establish a proactive capability and strengthen our

reactive capability, using new technology and increased resources.

We will develop our prevention plan and our strategic assessment for professional standards during 2023. We have already, with all other police forces checked the Police National Database for any adverse information about our workforce. We will deliver biometric vetting processes for all officers and contract an external provider to maintain this function.

### 3.2 Equality, Diversity and Inclusion

Advance equality of opportunity, foster good relations and engage with our people to ensure everyone's voices are heard.

We have completed our EDI strategy. Work will now commence to embed this strategy across the organisation. Key to the success of this work will be all officers and staff receiving EDI training. We will enhance the EDI training given to new recruits; this may involve extending our initial recruits course by one week. This will have financial and resourcing implications which we are working to identify.

We have streamlined our internal representative groups from 19 to four. This will help us to focus on key issues affecting our workforce and provide more support to those who need it most. We will also develop our EDI data requirements and enhance our data reporties to help us to build an inclusive workforce. We will improve our accessibility and inclusion, enhancing our training events and engagements with our stakeholders and the public.





Faith and Minority Ethnic Network





# Chief Executive Officer and Chief Constable's Overview

The Civil Nuclear Constabulary (CNC) is responsible for protecting the nation's civil nuclear material, and the government and the public can have the utmost confidence in our ability to do so, whether on the sites we protect, or material in transit across the UK or internationally on escort operations.

We protect the public in the vicinity of our sites and, as police officers, we are regularly called upon to support our local force policing colleagues at a range of incidents. I regularly commend officers and staff for their outstanding work and achievements, often where they have saved someone's life, and I am humbled and proud to do so.

The CNC provided armed mutual aid support to local police forces at a variety of events, including nearly 300 armed officers to support Operation London Bridge, the funeral of Her Majesty the Queen, and it was an honour and a privilege to do so.

We remain solidly behind our ambition 'to be recognised nationally and internationally as the leading policing organisation for the armed protection of civil nuclear material and the critical national infrastructure of the UK.'

We stand ready to collaborate with the Police Authority and the government to broaden our role and deliver efficient and effective armed protection in other locations, without taking our focus away from our core role to secure civil nuclear material.

Public confidence in policing has been adversely affected by high-profile events, especially the tragic murder of Sarah Everard by a serving police officer. As part of the wider police family, the CNC has a responsibility to instil the highest standards of professional behaviour to rebuild essential confidence in policing. We asked to be one of the police forces inspected by Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services during its inspection of police vetting, misogyny and culture; we have made considerable progress against the 43 recommendations and five areas for improvement directed at the police service. We are also implementing the recommendations from the internal cultural reviews and surveys we have carried out over the last two years.

Our cultural action plan is built on five themes – Equality, Diversity, and Inclusion (EDI); Professional Standards; Training; Human Resources; and Policy, and we are making good progress in all areas.

Our focus will remain on delivering our ambition and strengthening public confidence in the CNC and wider police service.



Simon Chesterman OBE, QPM Chief Constable and CEO

The <u>CNC Annual Report</u> and Account 2022/23 — mentions culture at several points, namely in Chief Constable and Chair's overviews

organisation throughout the year.

The Civil Nuclear Constabulary (CNC) sets out the policing priorities for 2022/23 in the Annual Policing Plan and the Authority holds the Chief Constable to account for the delivery of the Plan. I am pleased to report good performance over the last financial year in several key areas, including:

- Effective delivery of our core Mission to protect civil nuclear sites and nuclear material
- Providing support to Home Office forces for national events including Her Majesty The Queen's funeral and the Conservative Party conference
- Successful completion of an international operation to safely escort nuclear material across the globe
- A new, fully operational tactical training facility in Cumbria considered to be the best such facility in Europe
- Further development of business planning and enabling services, combining these functions into one directorate to support our ambitious projects to deliver an effective policing response
- Enhanced wellbeing services, mental health provision and focused plans to improve both Equality, Diversity and Inclusion and our leadership and management training

There has, rightly, been a sharp focus on the standards of behaviour and culture in policing across the UK during 2022/23, along with requirements to improve the vetting and conduct processes for officers and staff. The CNC has proactively engaged in national reviews by His Majesty's Inspectorate and contributed to national inquiries into vetting and misconduct. The Chief Constable, with support from the Authority, has set challenging and wide-reaching goals to enhance CNC's culture, standards and conduct and the Board will continue to monitor closely progress against stretch targets in this area over the coming year.

In recent months the UK Government has set out its commitment to nuclear energy, established a dedicated Department of Energy Security and Net Zero and launched Great British Nuclear to drive forward the delivery of new nuclear projects. As reported last year, the new Energy Bill makes provision to strengthen the powers of CNC to utilise its expertise in deterrence and armed response to support the security of other critical infrastructure sites. If enacted, these developments will secure CNC's long-term role in protecting civil nuclear material as well as expanding our core services for the benefit of wider national energy and public security. This will allow the Constabulary to manage the fluctuating demand for our services in the civil nuclear sector in the future and to spread overhead and operational support costs thereby reducing the financial burden on our SLCs.

The CNPA has developed a new three-year Strategic Plan (2023/26) which recognises that achieving our core Mission depends upon the commitment and dedication of our people and sets out the current and future investment in developing their skills and professionalism. In common with our partners across the civil nuclear industry, the Constabulary has faced increased commercial and financial burdens during the past financial year. To remain efficient and effective the Constabulary has reorganised its enabling functions to have a sharper commercial focus. The CNC has

developed an internal governance group to oversee a continuous improvement programme for the next financial year and through to 2026. This will identify invest to save options, innovations in our ways of working and areas for working in partnership and collaboration with other organisations.

The ongoing support of our stakeholders, across both the nuclear and policing sectors and our sponsoring government department is vital in ensuring we deliver our core Mission. The whole police service, of which we are a part, must work harder to rebuild public trust and confidence in policing. This will be central to our plans, actions and deliverables over the coming year.



Susan Johnson OBE Chair of the CNPA

## What has happened so far

The CNC is a unique organisation within UK policing. It is governed by the Civil Nuclear Police Authority (CNPA), regulated by the Office for Nuclear Regulation (ONR) and subject to licensing by the College of Policing.

The CNC is committed to achieving and maintaining an organisational culture that embraces difference. It has a strong, adaptive, inclusive culture where employees feel that they belong in the workplace. The Chief Constable has appointed an Executive Team Champion for EDI, who is the Deputy Chief Constable.

This new EDI Strategy sets out the CNC commitment and ambition to deliver sustainable change in response to internal and external organisational reviews including:

- The 2021 Deloitte Cultural Review commissioned externally, which highlights:
- Diversity: Whilst a significant amount of work has been completed to date, more work is required to engage minority groups and reduce defensiveness/misinterpretation of diversity initiatives across the organisation.
- Equality: Most people reported that they were treated fairly, but there
  is a minority who do not feel listened to or able to contribute ideas.
  A clear priority will be creating an environment where everyone feels
  that their perspective is valued.

- 2. The 2022 Independent Review of how gender is addressed within the CNC, carried out by an HR specialist. Overall, this found that the CNC does not have a misogynistic culture and recognised the significant work being carried out. Areas for improvement were identified with EDI training, learning and development, and leadership. It also identified that Human Resources required a refresh and this is now underway.
- 3. Other reviews and work completed include a review by Investors in People; the production of a Gender Responsive Policing Strategy (the first of its kind in UK policing); a Governance and Assurance Review; CNC employee engagement survey; an inspection by His Majesty's Inspectorate of Constabulary and Fire Service (HMICFS); and the Operation Hotton learning report (produced by the Independent Office for Police Conduct about the behaviour of officers based at Charing Cross Police Station).

As a result, the CNC has identified four priority areas for focus.

#### The priority areas for the EDI strategy are:

- Sexism and misogyny
- Racism
- Homophobia

Ableism

## Standards of behaviour

As a police force, we are bound by the College of Policing's Code of Ethics Framework. This sets the standard of behaviour for everyone who works in policing and covers policy, procedure, decision making, and actions taken. The code consists of three separate but complementary documents which collectively provide everyone in policing with the support and guidance to behave ethically and professionally.

- The Ethical Policing Principles
- . The Guidance on Ethical and Professional Behaviour
- . The Code of Practice for Ethical and Professional Policing

The CNC has a zero-tolerance position for unacceptable behaviours of bullying, harassment, and discrimination. Senior leaders have a particularly important role to model the behaviours expected and continue to increase their understanding. Leaders have a responsibility to also address unacceptable behaviours and to ensure their employees understand the importance of EDI to the effective achievement of the CNC's Mission.

#### Senior leaders will:

- · Role model the behaviours expected as key influencers of our culture
- Create an environment where all voices are heard and opportunities are provided equitably
- Undergo continuous learning and development to enhance their understanding of EDI.

#### Employees will:

- Understand their personal responsibility to align their behaviour with the Code of Ethics and our value of Inclusion
- Demonstrate inclusive behaviours to create a safe place for everyone to perform at their best
- Challenge and report unacceptable behaviour, including bullying, harassment, victimisation and discrimination.

# The Public Sector Equality Duty

The CNC must comply with the Section 149 of the Equality Act 2010 (The Public Sector Equality Duty) and this legislation underpins our EDI Objectives.

#### We will:

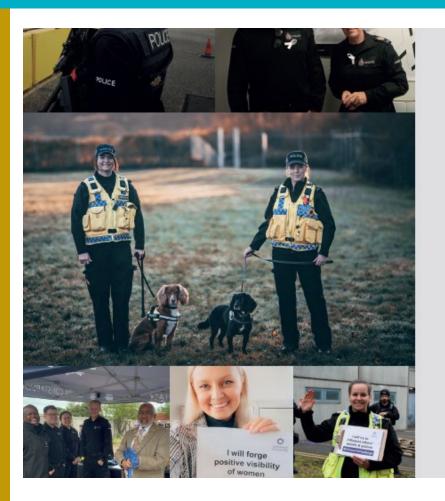
- Demonstrate due regard to eliminate discrimination, harassment and victimisation and other conduct prohibited by the Act
- Advance equality of opportunity between those who share a protected characteristic and those who do not<sup>3</sup>
- Foster good relations between people who have a protected characteristic and those who do not.





<sup>3</sup> The nine protected characteristics covered by the Equality Act 2010 are: Age, Race, Sex, Gender reassignment, Sexuality, Disability, Religion, Marriage and civil partnership, Perganary and Maternity.

The **EDI Strategy** has our culture at the heart of it and makes it clear why it is so important, and all the work done to date to tackle the issue. It is available on both our CNC GOV.UK and CNC Jobs website. Changes to culture are throughout, however specific reference can be found on pages six (what has happened so far) and page 10 (standards of public behaviour)



## **Background**

Providing equal rights to women and men in all aspects of life is fundamental to achieving gender equality and this was stressed as an Agenda 2030 United Nations goal 5 on gender equality and women empowerment. Internationally three United Nations Sustainable Development Goals (\$DGs) focus on achieving better outcomes for women namely \$DG 3 on good health and well-being, \$DG 5 on gender equality, and \$DG 16 on inclusive and peaceful societies.

Gender equality laws around the world have contributed to eliminate discrimination against women and to guarantee equal and fair freatment of men and women, so that they can fully exercise their human rights and create opportunities for women and men to participate in political, economic, and social development.

The government's Tackling Violence Against Women and Girls Strategy, launched in July 2021 sets out our approach to tackling orthes which disproportionately affect women and girls. Recently the extent to which violence against women and girls exists has been brought to the forefront of the nation's attention. We have seen reports to domestic abuse helplines increase in the context of Covid-19; and girls and women everywhere have shared their personal experiences of sexual abuse via the 'Everyone's invited' website, leading to an urgent Ofsted review in schools and colleges.

A key tenet of the government's strategy is prioritising prevention. More needs to be done to prevent women and girls becoming victims, more done about the perpetrators, education about consent, boundaries, a change at societal level.

Under the leadership of DCC Maggle Blythe, the

National Police Coordinator for violence against women and girls, the National Police Chiefs'. Council (NPCC) and College of Policing have published a new framework. This sets out how they will measure the Impact of the new policing Violence Against Women and Girls (VAWG) framework published in December 2021, which requires all police forces to take action to improve how they tackle VAWG. The VAWG Outcomes and Performance Framework explains the approach to outcome setting and performance management over the next two years.

The CNC approach to misconduct allegations where police officers are the alleged perpetrators of abuse is not detailed in this GRPS and is being addressed through the Professional Standards Department.

The tragic death of Sarah Everard has highlighted the need for urgent action to address culture and standards in policing to achieve gender equality and inclusivity. Following the development of the GRPS the CNC is currently reviewing its approach to its inclusion and Belonging Strategy and the other protected characteristics.

# What needs to change?

The CNC has internal organisational and personnel development processes in place to deliver further change to achieve gender equality across the business and provide external service delivery. These processes, however, require refinement.

A quick time CNC Gender Audit has been undertaken internally to inform this strategy to build on existing organisational intelligence of where the future development areas lie under the umbrella of gender. This has assessed the genderresponsiveness of the CNC in key areas of internal business structure, culture, and external interface and identified potential areas of development.\*

The Gender Audit considered a structural dimension of the CNC namely the visible and invisible objectives, rules, and procedures that the CNC follows e.g. Mission, Values, Strategic Objectives. Assessing the structural aspect of the CNC supports the intent to mainstream gender equality into the management and the procedures of the CNC. The Gender Audit also considered the human resource dimension, the organisational culture and the external interface of the CNC.

Focusing on six themes enabled the Gender Audit to capture key information:

- Performance effectiveness
- Laws, policies and planning
- Community relations
- · Accountability and oversight
- Personnel
- Institutional culture

The Gender Audit has informed the following objectives for the CNC which detail immediate, mid-term and long-terms actions for the organisation.





# **CNC GOV.UK and Jobs websites**

As well as all of the reports/strategies above being published on both the CNC and CNPA websites, we also have a section dedicated to CNC culture on the complete of both websites. This outlines exactly why culture is important to us and what work we are doing to make improvements, with all reviews listed.

## Culture at the CNC

An organisation's culture defines the proper way to behave within it. This culture consists of shared beliefs and values established by leaders and then communicated and reinforced through various methods, ultimately shaping employee perceptions, behaviours and understanding. Culture is extremely important in a police force, as we police by consent and must set the highest standards and lead by example to the public we protect and our stakeholders.

Since the shocking murder of Sarah Everard by a serving officer, trust and confidence in the police has been shaken and the police service, of which the CNC is part, has some work to do to rebuild this trust and ensure the public we serve know we will do so in a fair, professional and honest manner. The culture of the CNC is a priority and work has been ongoing for a number of months to establish what our culture is and if we need to make changes as an organisation. A number of reviews have been ongoing, including:

### **Cultural Review**

Commissioned by CNC Chief Constable Simon Chesterman, this full cultural review was carried out by an external consultancy, who ran workshops, focus groups and individual interviews, as well as a all employee survey to give people opportunity to speak openly and honestly about our culture.



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The CNC Jobs website also has the same information as the CNC GOV.UK website about our culture and the various reviews, posted on the <u>Life at the CNC page</u> in a prominent position

Chesterman, who joined the CNC as deputy chief constable in 2014 before being promoted five years later, said the fallout from Everard's murder had prompted him to commission an independent review of the force's internal culture, particularly for women.

Although he says it did not find any systemic failings when it reported last autumn, the review in part spurred Chesterman to introduce a string of new measures, including the monitoring of officers' communications and the creation of a new anti-corruption unit.



Simon Chesterman OBE, QPM Chief Constable and CEO

Simon Chesterman gave <u>an interview</u> to Sunday Times in March 2023 and gave full details of what reviews we undertook. The interview did not use all of it but did mention some of the steps taken. It also gave details of the steps the CNC has taken to proactively monitor communications sent using CNC systems by its employees: