

POLICE CODE OF PRACTICE FOR ETHICAL POLICING ANNUAL REPORT 2025 - 2026

***ADRODDIADAU'R BWRDD
ATEBOLRWYDD A SICRWYDD***

**ACCOUNTABILITY AND
ASSURANCE BOARD**

Date	JUNE 2026
Author	CSU J WADE (at time of writing) CH/INSP JENNIE TINSLEY-BRUSTAD
Responsible Officer	ACC J WADE



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CRYNODEB GWEITHREDOL | EXECUTIVE SUMMARY

This report provides assurance that the force continues to meet its obligations under the Police Code of Practice for Ethical Policing (2023) and the Code of Ethics (2024), demonstrating a positive trajectory from implementation to the embedding of ethical policing principles across governance, leadership, operational decision-making and workforce development. An overall assessment of AMBER (Improving) has been assigned, reflecting strong progress in integrating ethical standards into business-as-usual activity whilst recognising that further work is required to achieve full organisational maturity. Key strengths include comprehensive training and continuous professional development arrangements, visible leadership commitment, high workforce confidence in reporting and challenging inappropriate behaviour, and effective governance through the force Culture Board and Ethics Committee. The HMICFRS Self-Assessment identifies strong performance in embedding ethical principles, empowering ethical challenge, and engaging communities to build trust and confidence.

The report highlights strengthened leadership and governance arrangements through the appointment of dedicated ethics leads and the establishment of structured oversight and assurance mechanisms. Ethical principles are increasingly embedded within the Chief Constable's Delivery Plan, organisational values, performance frameworks and decision-making processes, ensuring that outcomes are achieved in a manner consistent with the principles of fairness, integrity, accountability and public service. Areas identified for continued development include ensuring consistency of ethical behaviours across the organisation, improving the quality and consistency of Equality Impact Assessments, embedding the duty of candour, and strengthening feedback and performance development processes. Priority actions for 2026/27 focus on further enhancing assurance frameworks, developing both internal and independent external ethics panels, establishing an Ethics Forum, and reinforcing ethical governance through the principles of Courage, Respect and Empathy, and Public Service. No new organisational risks have been identified, with existing culture-related risks continuing to be monitored through established governance arrangements and Culture Board oversight

CYFLWYNIAD A CHEFNDIR | INTRODUCTION & BACKGROUND

This report provides an update on the continued implementation and embedding of the Code of Practice for Ethical Policing (2023) and Code of Ethics (2024) within Gwent Police. The force has transitioned from implementation into an embedding phase, where ethical principles are consistently integrated into business-as-usual activity, leadership and decision making.



Gwent Police has transitioned into an embedding phase where ethical principles are integrated into governance, leadership, and operational decision-making, with an Overall Assessment at AMBER (Improving).

Key strengths include strong training, leadership engagement, and workforce confidence

The HMICFRS Code of Ethics Self-Assessment (2025/26) demonstrates strong performance across several key areas (GREEN), including:

- Embedding ethical principles through training and leadership
- Empowering staff to challenge and report misconduct
- Community engagement to build trust and confidence
- Professional development aligned to ethical policing standards

The assessment also identifies areas requiring further development (AMBER), specifically:

- Consistency of ethical behaviours across the organisation
- Quality and consistency of Equality Impact Assessments (EIAs)
- Embedding the duty of candour
- Strengthening feedback, performance and development processes.

Leadership of the Ethics portfolio has been strengthened through:

- Appointment of Chief Superintendent John Wade as Head of Ethics
- Appointment of Chief Inspector Jennie Tinsley Brustad as Chair of the Ethics Committee

This provides clear accountability, strengthened governance, and renewed strategic focus on ethical culture.

Governance is well established through the Force Culture Board, supported by structured action planning, improved assurance processes, and alignment with organisational culture risk.

Overall, Gwent Police demonstrate a positive trajectory toward mature ethical policing, with focus now on consistency, measurable impact and sustained cultural change.

Since the introduction of the revised Code of Ethics (2024) and the Police Codes of Practice for Ethical Policing, the force has embedded ethical principles into governance, operational decision-making, and workforce development.

Embedding the Code of Ethics

Gwent Police has taken a structured and organisation-wide approach to embedding the Code of Ethics, ensuring it is not only understood but actively applied in day-to-

day decision-making. This is achieved through a combination of learning, leadership, and cultural interventions, including:

- Mandatory training and continuous professional development (CPD) for all officers and staff, ensuring consistent understanding of ethical standards regardless of role, rank, or function
- Leadership programmes that explicitly incorporate ethical decision-making models, equipping supervisors and senior leaders to role model values-led behaviours and provide ethical guidance
- Upstander/Bystander training delivered force-wide, which empowers individuals to challenge inappropriate behaviour, reinforce accountability, and prevent ethical breaches at an early stage.

These initiatives ensure that ethical awareness is not static but continually refreshed and reinforced throughout an individual's career.

Embedding Through the Chief Constable's Delivery Plan

Ethical principles are further embedded through the force's clearly articulated organisational values, which provide a behavioural framework for all activity. These values: **Be Compassionate, Be Courageous, Be Proud, Be Positive, and Keep Learning**, translate the Code of Ethics into practical expectations and everyday actions. They underpin how officers and staff engage with the public, make decisions, and interact with colleagues, helping to create a consistent and values-driven culture.

The Chief Constable's Delivery Plan plays a central role in embedding the Code of Ethics by aligning strategic priorities with ethical policing principles. The Plan provides a clear line of sight between organisational objectives and the behaviours expected under the Code, ensuring that ethics are integral to how policing outcomes are achieved, not separate from them.

- **Strategic Alignment:** Each priority within the Delivery Plan reflects the principles of fairness, accountability, integrity, and respect. For example, commitments to improving public confidence, protecting vulnerable people, and tackling crime are explicitly linked to ethical policing standards.
- **Performance and Accountability:** Ethical behaviour is built into performance frameworks, with leaders held accountable not only for outcomes but for how those outcomes are delivered. This reinforces the expectation that results must be achieved in a way that is consistent with the Code of Ethics.
- **Leadership Expectations:** The Delivery Plan emphasises visible, values-based leadership. Senior leaders are expected to actively promote ethical behaviours, address misconduct, and foster an environment where challenge and reflection are encouraged. This reinforces the principle of "doing the right thing" at all levels.



- **Workforce Culture and Wellbeing:** The Plan recognises that an ethical organisation depends on a supported workforce. Initiatives relating to wellbeing, inclusion, and professional development contribute to a culture where individuals feel confident in raising concerns.
- **Continuous Improvement and Learning:** Through the “Keep Learning” value, the Delivery Plan supports reflective practice, learning from incidents, and organisational development. Ethical considerations are incorporated into reviews, debriefs, and lessons learned processes, ensuring continual alignment with national standards and best practice.
- **Prevention and Early Intervention:** By embedding upstander behaviours and encouraging ethical challenge, the Delivery Plan supports early identification and resolution of cultural or behavioural issues, reducing risk and strengthening integrity across the force.

GOVERNANCE

Oversight is delivered through the Force Culture Board, ensuring:

- Ethical standards are monitored
- Delivery aligns with organisational culture risk
- Continuous improvement is driven

Assurance has improved through:

- RAG rated action plans
- Ethics Committee and Ethical Dilemmas submissions
- Integration within wider governance frameworks

COMMUNICATION AND CULTURE

Corporate Communications continues to embed ethical standards through internal messaging, leadership engagement, and organisational campaigns.

Ethical culture is supported by:

- Ethics as a standing agenda item at key meetings
- Campaigns promoting challenge and accountability

Employee Opinion Survey (2025) results indicate:

- High confidence in reporting and challenging inappropriate behaviour
- Strong sense of respect and professionalism
- Positive leadership modelling of ethical values

Year	Key Development
2010	Initial drafting of the Codes of Ethics
2014	Formal adoption and implementation of the Code
2018	Launch of public engagement initiatives
2021	Enhancement of whistleblower protection policies
2021	Public consultation on the new Code of Ethics
2023	Code of Practice for Ethical Policing came into effect 6 th December 2023
2024	New Code of Ethics launched on 24 th January 2024
2026	HMICFRS Codes of Ethics Self-Assessment completed
2026	Ethics Panel established with ethical dilemmas discussed and considered
2026-27	Creation of the Independent/External Ethics panel

MATERION I'W HYSTYRIED | ISSUES FOR CONSIDERATION

Embedding Ethical Principles in Governance

Courage

Governance structures should require decision-makers to demonstrate ethical courage by clearly articulating and evidencing how difficult decisions, trade-offs, and challenges have been addressed. This includes transparent recording of rationale, areas of challenge, and how integrity has been upheld, particularly in relation to resource allocation and organisational priorities.

Respect and Empathy

All governance and stakeholder engagement activity should be designed through a lens of inclusivity, fairness, and understanding. Processes should explicitly demonstrate how the views, needs, and impacts on staff, partners, and communities have been considered, ensuring that decisions reflect empathy and promote procedural fairness.

Public Service

Decision-making should consistently reflect the overarching principle of serving the public interest. Governance frameworks should require clear articulation of how outcomes deliver benefits to communities, maintain public trust and confidence, and balance competing demands in a way that is transparent and accountable.



Conclusion

By embedding these three principles into governance templates, decision logs, and engagement processes, the force will strengthen consistency, transparency, and corporate memory, ensuring ethical considerations are not only applied but clearly evidenced and contribute to ongoing organisational learning and continuous improvement.

CYDWEITHIO | COLLABORATION

Gwent Police continue to collaborate with:

- College of Policing
- Welsh policing partners
- Community stakeholders and Independent Advisory Groups
- Regional Ethics Committee
- Internal Ethics Committee - Committee Representation: The Committee brings together a wide cross-section of departments to ensure balanced ethical oversight, including Corporate Communications, Learning & Development, HR, Professional Standards, Counter Corruption, Crime Operations, EDI/Positive Action, Digital/Devices, Roads Policing, Neighbourhood Policing and Justice Services.

Key Areas Covered to date

Governance & Ethics Frameworks: Development of a Terms of Reference, ethical strands, and contribution to the Code of Ethics self-assessment.

Public Trust & External Platforms: Review of Neighbourhood Alert, focusing on risks around commercial advertising and ensuring transparency to the public.

Social media & Professional Standards: Discussion of a proportionate policy addressing on/off-duty behaviour, appropriate platform use, and information security.

Workforce Integrity: Agreement that low-level online selling is acceptable unless it becomes commercial or involves misuse of time, devices, or undeclared income.

Operational Ethics: Discussion and consideration of mandating TFC training, highlighting tensions between operational need and fairness/career progression.

Next Ethical Dilemma / Focus

Supporting a Student Officer Returning from Extended Maternity Leave: Balancing Operational Competence, Fairness, and EDI Considerations Amid Policy Variance.

The Committee is embedding consistent, proportionate ethical decision-making through cross-force representation, structured governance, and practical, scenario-based discussions to maintain public trust and organisational integrity / confidence.

Independent Committee - The establishment of the independent committee remains in progress; however, confirmed representation to date includes members from the Independent Advisory Group (IAG), the Office of the Police and Crime Commissioner (PCC), Selectif, and academic partners, including the Head of Operational Policing at the University of South Wales and Professor Ilbiz (USW).

This supports consistency, shared learning, and improved public confidence.

CAMAU NESAF | NEXT STEPS

Development of:

- Internal Ethics Committee
- External Independent Ethics Panel
- Enhanced assurance frameworks
- Creation of Ethics Forum.
- Embedding the duty of candour into initial and continuous training

YSTYRIAETHAU ARIANNOL | FINANCIAL CONSIDERATIONS

There are no additional financial implications to embedding, however failing to adhere to the Codes of Practice, could leave the force open to Employment Tribunals, complaints and grievances.

YSTYRIAETHAU PERSONÉL | PERSONNEL CONSIDERATIONS

Training and Development

Training ensures staff are equipped to apply ethical principles effectively by working collaboratively with Learning & Development (L&D), Professional Standards Department (PSD), Counter Corruption Unit (CCU), Human Resources, Recruitment and Positive Action, Equality, Diversity and Inclusion (EDI), Corporate



Communications, Operational Commands (including Neighbourhood, Response and Crime Pillars), Digital/IT/Devices teams, Justice Services and the Chief Officer Team. This is delivered through:

- National Decision Model (NDM)–based decision-making
- Leadership development programmes
- Continuous professional development (CPD)
- Equality, diversity and inclusion training

This integrated approach supports the consistent application of ethical standards across all areas of policing.

Workforce data evidences strong confidence in ethical culture and reporting mechanisms.

YSTYRIAETHAU CYFREITHIOL | LEGAL CONSIDERATIONS

Statutory Compliance

The College of Policing Code of Practice for Ethical Policing (2023) is issued under the Police Act 1996 and places a statutory obligation on forces to ensure that all policing activity is conducted in line with its principles. This includes adherence to the Code of Ethics, which underpins professional standards, decision-making, and behaviour across all ranks and roles.

Gwent Police demonstrates compliance through the integration of the Code within:

- Strategic decision-making structures (including JESG and Gold Groups)
- Operational policies and procedures
- Leadership expectations and performance frameworks.

Lawful and Proportionate Decision-Making

Gwent Police continue to evidence compliance with legal requirements by embedding structured decision-making models, including:

- The National Decision Model (NDM)
- JESIP Joint Decision Model (JDM) for multi-agency environments

These frameworks ensure decisions are:

Proportionate – balanced against the level of risk and potential impact

Lawful – grounded in relevant legislation (e.g., Human Rights Act 1998, Equality Act 2010)

Accountable- Through BWV, Control and Decision Logs, Crime Recording and HR systems

Necessary – justified by a clear operational or organisation need

This approach mitigates legal risk and strengthens organisational defensibility, particularly in:

- Use of powers and force
- Information sharing
- Resource prioritisation
- Multi-agency incident response
- Complaints and internal grievances

YSTYRIAETHAU CYDRADDOLDEB A HAWLIAU DYNOL | EQUALITIES & HUMAN RIGHTS CONSIDERATIONS

This report aligns with Gwent Police's Strategic Equality Plan, supporting compliance with the Public Sector Equality Duty (PSED) under the Equality Act 2010.

The organisation actively works to:

- Eliminate unlawful discrimination
- Advance equality of opportunity
- Foster good relations between diverse communities

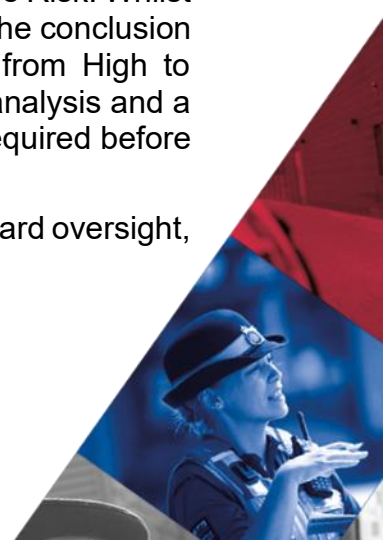
This report has been considered against the general duty to promote equality, as stipulated under the Strategic Equality Plan and has been assessed not to discriminate against any particular group.

In preparing this report, consideration has been given to requirements of the Articles contained in the European Convention on Human Rights and the Human Rights Act 1998.

RISG | RISK

The most significant area of risk discussion remains the Corporate Culture Risk. Whilst evidence of improvement was acknowledged at the last Culture board, the conclusion was that there is currently insufficient assurance to reduce the risk from High to Medium. Culture board members agreed that further workforce survey analysis and a more detailed assessment of the underlying culture risk pillars are required before reconsideration.

Any additional, potential risk is mitigated through governance, Culture Board oversight, and continuous learning



ATODIADAU | ANNEXES

Force Action Plan

HMICFRS Self-Assessment

BUDD Y CYHOEDD | PUBLIC INTEREST

In producing this report, has consideration been given to 'public confidence'?	Yes ☒ No ☐
Are the contents of this report, observations and appendices necessary and suitable for the public domain?	Yes ☒ No ☐
If you consider this report to be exempt from the public domain, please state the reasons:	

I confirm this report has been discussed and approved at a formal Chief Officers' meeting 08.09.2026.

I confirm this report is suitable for the public domain for the reasons stated previously.

Signature	
Date	23.09.2026