

Subject: Appointment and Training of Legally Qualified Persons and Independent Panel Members

Originator: Assistant Director – Performance & Scrutiny

Decision no. 50/2025

Reason for submission: For Decision

Submitted to: Sarah Taylor – Police and Crime Commissioner for Norfolk

Summary:

1. This paper sets out the steps to ensure that the Eastern Region Police (Fire) and Crime Commissioners – Bedfordshire, Cambridgeshire, Essex, Hertfordshire, Norfolk and Suffolk, as well as the Ministry of Defence Police – have a list of nominations to serve as Independent Panel Members (IPMs) and Legally Qualified Persons (LQPs) for police misconduct hearing panels and appeals under The Police (Conduct) Regulations 2012, The Police Appeals Tribunals Rules 2020, The Police (Conduct) (Amendment) Regulations 2024, The Police (Vetting) Regulations 2025, and any successor legislation and amendments.
2. The steps to fulfil this responsibility fall to Police (Fire) and Crime Commissioners and have been pursued on a collaborative basis by the six Offices of the Police (Fire) and Crime Commissioners within the Eastern Region since 2014, with panel members required to be able to cover any force area within the region. The Ministry of Defence Police entered this collaboration in January 2024.
3. It is proposed that the list of IPM nominations be formed from those re-appointed as IPMs and from those who were selected to fulfil the role.
4. It is proposed that the list of LQP nominations be formed from those individuals who undertook the role of Legally Qualified Chair (LQC) and who confirmed they wish to continue with the role of LQP within the police misconduct process.
5. It is proposed that the list of IPMs and LQPs are appointed to police misconduct hearings, police appeals tribunals and vetting appeals in the Eastern Region where appropriate and when required by relevant Police (Fire) and Crime Commissioners.

Recommendation:

It is recommended that the Police and Crime Commissioner agrees to the proposals to appoint LQPs and IPMs to police officer misconduct panels and police appeals tribunals in accordance with the updated Eastern Region's approach to the [Selection of Misconduct Panels and Police Appeals Tribunals](#).

It is also recommended that the Police and Crime Commissioner agree to the proposals to appoint IPMs to police officer appeals following withdrawal of vetting clearance.

Outcome/approval by: Sarah Taylor – Police and Crime Commissioner for Norfolk

The recommendations as outlined above are approved.

Signature:

A handwritten signature in black ink, appearing to read 'Sarah Taylor', with a stylized flourish at the end.

Date: 05/01/2026

Detail of the submission

1. Objective:

- 1.1 The Police and Crime Commissioner (PCC) is required to maintain a list of Legally Qualified Persons (LQPs) and lay persons known as Independent Panel Members (IPMs) to sit on police misconduct hearings and appeals under The Police (Conduct) Regulations 2012, The Police Appeals Tribunals Rules 2020, The Police (Conduct) (Amendment) Regulations 2024, The Police (Vetting) Regulations 2025, and any successor legislation and amendments.
- 1.2 The six PCCs making up the Eastern Region (namely Bedfordshire, Cambridgeshire, Essex, Hertfordshire, Norfolk, and Suffolk) have worked together since 2014 to compile, maintain and administer a joint list of panel members to sit on police misconduct hearings and appeals held across the region. The Ministry of Defence Police entered this collaboration in January 2024 to utilise this pool of panel members following a change of venue for their misconduct hearings to Cambridgeshire.
- 1.3 Initially, 18 IPMs were originally selected and appointed to serve across the Eastern Region. Their term of appointment, commencing on 1 June 2014, was for an initial five-year period, subject to a further period of service, if agreed following review.
- 1.4 During 2018 the Member Misconduct Oversight Panel (MMOP), comprising officers from each of the offices of police and crime commissioners across the Eastern Region, considered the arrangements for the recruitment of further IPMs and/or the current IPMs. Of the 15 IPMs still serving and active, 14 wished to be considered for re-appointment. All 14 IPMs who wished to be re-appointed had attended training, had all sat on panels regularly and no issues had been raised about their service by relevant Professional Standard Departments (PSD). In the light of these factors, the MMOP agreed that all 14 IPMs should be recommended for appointment for a further five-year period commencing in 2019 and that there was no pressing need to hold a recruitment process to secure additional IPMs.
- 1.5 In 2024 the MMOP went through the same exercise and reappointed 11 of the IPMs still serving and active for a further two years. The MMOP also considered the need to appoint legally qualified advisors from their pool of panel members following the legislative changes in the composition of police misconduct panels.
- 1.6 In 2025 the Government laid The Police (Vetting) Regulations 2025, which established a legal duty for all serving police officers to hold and maintain vetting clearance, allowing forces to remove officers failing these checks, and creating a formal process for reviewing and withdrawing clearance. This legislation also allows for a police officer to appeal following withdrawal of

vetting clearance, and a panel must be appointed to confirm or reverse the withdrawal. The MMOP considered how it could appoint lay persons who are required to sit on vetting appeals, and they agreed to utilise the IPMs from their regional list where they have consented to be selected.

2. Background:

- 2.1 In 2023 the Government launched its review into the process of police officer dismissals and announced substantial changes to the police misconduct, vetting and performance systems. The first stage involved changes to police conduct regulations through The Police (Conduct) (Amendment) Regulations 2024 and amended the composition of misconduct panels, removing the role of Legally Qualified Chairs (LQC) and giving responsibility for chairing non-senior misconduct proceedings to chief officers, or their delegate.
- 2.2 The 2024 Regulations also introduced a legal advisor role which provides misconduct panels with advice on legal and procedural matters. This means that panels for non-senior officers now consist of a senior police officer Chair and two IPMs. The second IPM (known as IPM 2) selected in accordance with the 2024 Regulations will, in addition to the first IPM, have qualifications, experience or be able to demonstrate certain competencies which are relevant for the purpose of disciplinary proceedings. It is stated that this could include, but is not limited to, those who:
- can demonstrate a commitment to setting standards through senior leadership roles in other organisations or sectors,
 - hold expertise in Human Resources,
 - or have experience of professional disciplinary processes.
- 2.3 18 new IPMs were recruited following advertising and publishing through local networks and partners, shortlisting of application forms and interviewing by members of the MMOP. These were added to the regional list creating a pool of 29 IPMs who have been trained in the relevant procedures and regulations. Several of the IPMs recruited have the relevant experience listed above and have been identified as IPM 2s, meaning they are able to sit as either IPM 1s or IPM 2s as required. It is therefore possible to appoint two IPM 2s to a misconduct panel, but not two IPM 1s.
- 2.4 In 2025 as part of the second stage of the review by the Government, it laid The Police (Vetting) Regulations 2025 which introduced a legal duty for police officers to hold and maintain vetting clearance and created bespoke provisions enabling police forces to dismiss officers who fail to comply with the duty. The 2025 Regulations provided an officer to appeal against any decision to withdraw their vetting clearance if the decision were unreasonable, there is

evidence that was not considered which could have materially affected the decision or, the regulations have not been followed causing unfairness.

- 2.5 An appeal meeting must be determined by a panel comprised of the chief officer, a senior officer, and a lay person, who would be appointed by the local policing body. The MMOP agreed to approach its current pool of IPMs and train those interested in sitting on these appeals, so they can appoint an IPM into the lay person role on the panel. 27 IPMs agreed to undertake this role and appropriate training to sit on vetting appeals within the region. This provides an efficient and effective approach to appointments of lay persons to these panels, rather than needing to start a whole new recruitment process.
- 2.6 The MMOP also considered the appointment of Legally Qualified Chairs (LQCs) as Legally Qualified Persons (LQPs). In 2023 the PCC agreed to appoint and reappoint LQCs for the Eastern Region. The MMOP agreed to approach these LQCs for indications of interest in sitting as LQPs, and 29 indicated they would like to be appointed under new terms in the new role of providing legal advice to police misconduct hearings, rather than being the chair. The MMOP checked to confirm they had attended relevant training, had all sat on panels regularly, and no performance or conduct issues had been raised about their service by relevant Professional Standard Departments (PSD). In the light of these factors, the MMOP took the view that 29 LQPs should be recommended for appointment for a five-year period.

3. Areas for consideration:

- 3.1 The proposed appointments and reappointments provide the PCC with reassurance that there are sufficient LQPs and IPMs in the region to deliver an effective police misconduct regime. The recruitment provided greater resilience for the increased volume of misconduct hearings across the region, plus the need to have an additional IPM to sit on police misconduct panels. It also afforded for any increases in the volumes of police appeals tribunals and has also provided the region with a pool of lay persons who can be appointed to sit on vetting appeals to allow a police officer to appeal following withdrawal of their vetting clearance.
- 3.2 This is important to ensure that cases of police misconduct, police appeal tribunals and vetting appeals are heard appropriately and in a timely manner, so that officers who should not be in the police service are removed quickly.
- 3.3 The process for selecting and appointing a panel member has been added to the Eastern Region's [Selection of Misconduct Panels and Police Appeals Tribunals](#) policy. The PCCs within the region have all agreed to publish this on their websites so that their approach to appointment of panel members to police misconduct hearings and tribunals can be seen to be fair and transparent.

4. Other options considered:

- 4.1 The PCC has the option not to accept this approach. However, given that PCCs have a statutory responsibility to appoint LQPs and IPMs to police misconduct hearings, police appeals tribunals and vetting appeals, this approach is not recommended.
- 4.2 The PCC could decide to exit the regional arrangements and recruit, train, administer the list of panel members, and appoint LQPs and IPMs independently of the Eastern Region arrangement. However, this would be far more costly to the taxpayer and potentially provide less resilience within the list of panel members, particularly given the geographical location of the county. Given the system has worked well for over ten years, this approach is not recommended.

5. Strategic aims/objective supported:

- 5.1 The handling of police complaints has a direct impact on building trust and public confidence in policing which is a fundamental thread running through the PCCs Police and Crime Plan (2025-29). Supporting an effective and efficient police complaints system is also important to ensure Norfolk Constabulary is properly resourced and staffed appropriately, which creates a safer, stronger community for all.
- 5.2 Throughout the process the MMOP liaised with the Association of Policing and Crime Chief Executives' (APACCE) Professional Standards and Conduct Network. The MMOP also consulted with current panel members and liaised with the Magistrates' Association.
- 5.3 Through their respective members, the MMOP have also liaised with each PSD in the Eastern Region to gather feedback on panel members and to ensure the group can provide the appropriate resources required for PSD to undertake their roles and duties in misconduct hearings and appeals in accordance with new legislation and regulation changes.
- 5.4 The decisions in this report will support an effective police misconduct complaint system which in turn will support operational policing by addressing inappropriate behaviour and culture, improving timeliness for misconduct cases, and providing increased scrutiny and transparency in the misconduct process.
- 5.5 This also supports the Government's goal to ensure the police service is professional, accountable, and focused on delivering for the public by strengthening dismissal powers for serious misconduct, such as violence against women and girls' offences.

6. Financial and other resource implications:

- 6.1 The revised Police (Conduct) (Amendment) Regulations 2024 changed the membership of a police misconduct panel, so each hearing has two IPMs and an LQP rather than one IPM and one LQC under the previous regime. There is no difference between the two IPMs in terms of payments, however this means the cost for each hearing has increased, as have the volume of hearings and appeals nationally, regionally, and locally.
- 6.2 The nationally recommended level of remuneration for IPMs also increased after no change for over ten years. This is reflected in the new Terms and Conditions for IPMs with their daily rate increasing to £357. The recommended rate of pay for an LQP is currently set at £511.56 per day. These fees are paid from Norfolk Constabulary's PSD budget.
- 6.3 There are no direct OPCCN staff financial implications from this decision, other than the increased support required from staff to appoint more panel members to hearings and appeals, and to assist with any regional training for panel members as required.

7. Carbon Emissions and Other Environmental Implications:

Carbon Emissions:

- 7.1 The estimated impact on our carbon emissions that must be reported under current statute from this proposal is:

Emission Categories:	Increase in tCO2	Saving in tCO2
Scope 1 – Fuel – Building Heating	0	0
Scope 1 – Fuel – Transport	0	0
Scope 2 – Electricity	0	0

Environmental Implications:

- 7.2 No material implications.

8. Other implications and risks:

- 8.1 The MMOP is aware that the recruitment of panel members is made at a single point in time and, although sufficient references are checked and completed during the recruitment process, there is a need for ongoing checks during the appointment of panel members. The MMOP are therefore discussing options for continuous assessment, including emailing annual integrity checks to all panel members for self-completion and compliance.
- 8.2 The MMOP has recruited, trained, and checked panel members to ensure there are sufficiently qualified members to sit on police misconduct panels,

hearings and appeals. The MMOP meet regularly to monitor the performance and conduct of panel members, and discuss any issues or concerns raised by their relevant police force area PSD.

Originator checklist (must be completed)	Please state 'yes' or 'no'
Has legal advice been sought on this submission?	Yes
Has the PCC's Chief Finance Officer been consulted?	Yes
Have equality, diversity and human rights implications been considered including equality analysis, as appropriate?	Yes
Have human resource implications been considered?	Yes
Is the recommendation consistent with the objectives in the Police and Crime Plan?	Yes
Has consultation been undertaken with people or agencies likely to be affected by the recommendation?	Yes
Has communications advice been sought on areas of likely media interest and how they might be managed?	Yes
Have sustainability and environmental factors been considered? (e.g. biodiversity, employee commuting, business travel, waste and recycling, water, air quality, food and catering and estates construction)	No
In relation to the above, have all relevant issues been highlighted in the 'other implications and risks' section of the submission?	Yes

Is this report a Confidential Decision?

No

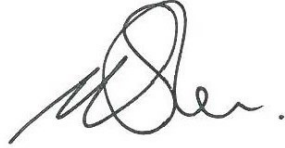
If Yes, please state reasons below having referred to the [PCC Decision Making Policy](#)

Approval to submit to the decision-maker (this approval is required only for submissions to the PCC).

Chief Executive

I am satisfied that relevant advice has been taken into account in the preparation of the report, that the recommendations have been reviewed and that this is an appropriate request to be submitted to the PCC.

Signature:



Date: 23/12/2025

Chief Finance Officer (Section 151 Officer)

I certify that:

- a) there are no financial consequences as a result of this decision,
Or
- b) the costs identified in this report can be met from existing revenue or capital budgets,
Or
- c) the costs identified in this report can be financed from reserves
And
- d) the decision can be taken on the basis of my assurance that Financial Regulations have been complied with.

Signature:



Date: 23/12/2025

Public access to information: Information contained within this submission is subject to the Freedom of Information Act 2000 and wherever possible will be made available on the OPCC website. Submissions should be labelled as 'Not Protectively Marked' unless any of the material is 'restricted' or 'confidential.' Where information contained within the submission is 'restricted' or 'confidential' it should be highlighted, along with the reason why.