

Thank you for your request for information (08.02.13). You requested *all papers relating to the West Yorkshire Police Authority's Audit and Risk Committee, held 2 November 2012.*

You can find copies of the papers for this meeting at this link:

<http://www.webarchive.org.uk/wayback/archive/20121121093107/http://www.westyorkshire.police.uk/sites/default/files/files/wypa/ar-ar-021112.doc>

I am attaching a copy of Item 14 - Operation Waldhorn, which has recently been disclosed. Please note that the redactions that have been applied have been challenged under the Commissioner's appeals procedure and are presently under review.

Section 17 of the Freedom of Information Act 2000 states that:

- (1) A public authority which, in relation to any request for information, is to any extent relying on a claim that information is exempt information must, within the time for complying with Section 1(1), give the applicant a notice which:-
  - (a) states the fact,
  - (b) specifies the exemption in question, and
  - (c) states (if that would not otherwise be apparent) why the exemption applies.

## **REASONS FOR DECISION**

The reason that we are unable to provide you with this information is covered by the following exemption:

### **S40(2)(a)(b) - Personal Information**

Section 40 (2) is a class based exemption, and provides an absolute exemption where disclosure of the personal data would breach the Data Protection principles. Where personal information has been redacted in this case, the Office of the Police and Crime Commissioner considers that disclosure of the personal information would breach the first principle of the Data Protection Act, in that it would not be 'fair and lawful' to the data subject. All individuals have a right to privacy under the Data Protection Act 1998, and the right to respect for their private and family life under Article 8 of the European Convention of Human Rights. It is reasonable that these individuals have an expectation of privacy. The nature of this request deals with a subject that involves violent, career criminals and disclosure of personal information would place individuals at risk of harm. The Office of the Police and Crime Commissioner has a duty of care and confidentiality to the individuals concerned. Whilst there is a public interest in the accountability of public servants, it is not considered that the disclosure of individual names and personal information would add value in this case.

It can be seen that some names have been included. These relate to individuals where it is considered that their senior, public position is such that their expectation of privacy in relation to such matters is lower, there is an increased threshold for accountability and, given the risks to which their public position necessarily exposes them, it is not considered that this would be exacerbated by disclosure.

### **Section 31 (1) (a) (b) (c)**

Section 31 (1)(a)(b)(c) is a prejudice based qualified exemption. There is a requirement to articulate the harm in disclosing the information, as well as considering the public interest. It should be noted that the public interest is not what is of interest to the public, but what is of benefit to society. Lord Wilberforce said in *British Steel Corp v Granada Television Lts* [1981] AC 1096 at 1168: "There is a wide difference between what is interesting to the public and what is in the public interest to make known"

## **Considering if the exemption is engaged (Harm in disclosure)**

Modern day policing is intelligence led. Information is available publically, and it is a well-known fact that Covert Human Intelligence Sources (CHIS) are used in the prevention and detection of crime, and that they are a valuable intelligence tool in the fight against all types of crime.

Disclosure of the requested information into the public domain would hinder the prevention and detection of crime. For example, it would compromise techniques used in relation to CHIS and, by extension, compromise the ability to protect confidential sources and their families. This fear of risk of exposure and for safety would, in turn, hinder the ability of police forces to recruit and retain sources and so reduce the flow of intelligence into the police service. This then places members of the public at risk of harm from crime.

In addition, the disclosure of the information on CHIS management and handling would enable criminals to counteract police intelligence-gathering methods. This would seriously undermine police operations and future prosecutions. This would be to the detriment of providing an efficient policing service and would compromise the key policing roles of preventing and detecting crime and protecting the public at large. Disclosure of information that undermines the operational integrity of police activities will adversely affect public safety and have a negative impact on law enforcement.

## **Public Interest Factors favouring disclosure**

- General public interest in transparency.
- Enhance public knowledge on how CHIS are used.
- Inform public debate on West Yorkshire Police decision making and integrity.
- Ensure accountability for the appropriate use of public funds.
- Add to information in the public domain to inform a fuller public debate.

## **Public Interest Factors favouring maintaining the exemption**

- Law enforcement tactics would be compromised.
- Individuals would be placed at risk.
- Prevention and detection of crime.
- The revealing of tactics would mean more police resources would be needed.
- Disclosure could increase the chance of identification, or misidentification, of individuals. This places themselves and their families at risk. Arguments of misinterpretation generally carry little weight in considering the public interest, although in this case as it could compromise the health and safety of individuals, then it is considered relevant.

## **Balancing Test**

The subject of the request is currently under discussion in the media and public authority decision making is subject to scrutiny. It is important to add to public



debate to ensure it is well informed and that public authorities are transparent and accountable for their actions. There is some public interest in disclosure. However, the public interest in allowing the police to protect the public and individuals through carrying out its core functions of prevention and detection of crime, apprehending and prosecuting offenders and the administration of justice is stronger. It is entirely reasonable for a member of the public to expect the police service to protect information of this nature and therefore maintain their law enforcement capability. The Office of the Police and Crime Commissioner considers, in this case, the factors against complying with section 1(1)(b) to outweigh those in favour of complying. Therefore, the balance lies in favour of non-disclosure and the exemption is engaged.



**NOT FOR PUBLICATION:  
THIS REPORT DEALS WITH  
EXEMPT INFORMATION AS  
DESCRIBED IN PARAGRAPH  
2 OF PART 1 OF SCHEDULE 12A TO  
THE LOCAL GOVERNMENT ACT  
1972**

**AGENDA ITEM NO: 14**

**AUDIT AND RISK  
COMMITTEE**

**2 NOVEMBER 2012**

**SUBJECT: OPERATION DOUGLAS/WALDHORN**

**Report of the Chief Constable**

## **PURPOSE OF THE REPORT**

1. The purpose of this report is to provide Members with a summary of the investigation undertaken by West Yorkshire Police supervised by the Independent Police Complaints Commission (IPCC) relating to Operation Douglas.

## **RECOMMENDATION**

2. That Members use the information provided in this report to assure themselves that terms of reference for the Operation Waldhorn have been met and that any shortfalls, remedial actions and lessons learnt have been identified and actioned.

## **KEY INFORMATION**

3. Attached at Appendix A is a summary of the confidential report from the team involved in Operation Waldhorn. This investigation was undertaken by West Yorkshire Police as a supervised enquiry by the IPCC, was borne out of an enquiry conducted by North Yorkshire Police relating to alleged criminal and disciplinary offences by West Yorkshire Police Officers in the 1990s in respect of the conditions bestowed on an informant in a murder trial
4. The terms of reference of the investigation were agreed between the commissioning officer, DCC Mr John Parkinson, the Police Authority and the IPCC. The specific terms of reference and the findings are laid out in Appendix A. The recommendations made within the report will now be taken forward, both internally and with the relevant authorities through existing organisational learning and development mechanisms. A copy of the full report can be made available to Members to scrutinise, but given the protective marking this document can not be in the public domain.
5. The findings of the investigation in respect of Term of Reference 1 have been independently reviewed by the Association of Police Officers lead for Professional Standards and a copy of his findings can be found at Appendix B.
6. The IPCC have also reviewed the overall findings of the investigation and have confirmed that the terms of reference of the investigation have been satisfied. A copy of the IPCC letter can be found at Appendix C.

## **STRATEGIC RISK IMPLICATIONS**

7. There are considerable reputational risks for the Force should it not follow the relevant regulations in relation to handling co-operating offenders. The recommendations outlined within the report will mitigate the risks.

## **RESOURCE IMPLICATIONS**

8. There are no resource implications resulting from the content of this report. The investigation was undertaken by a Detective Superintendent and staff of the Homicide and Major Enquiry Team and there were no additional costs incurred.

## **EQUALITY AND DIVERSITY CONSIDERATIONS**

9. It is not considered that there are any Equality and Diversity considerations in respect of the content of this report.

## **HUMAN RIGHTS CONSIDERATIONS**

10. The report made a number of recommendations in respect of the development of national and local policy for the management of co-operating offenders. Failure to take these recommendations forward could impact on the human rights of offenders.

## **CONTRIBUTION TO THE POLICING PLAN**

11. It is not considered that this report has any direct impact on the Policing Plan. As identified above there is a reputational risk associated with adverse media coverage of any cases where co-operating defendants may be used, which in turn could impact on confidence in the police.

## **IMPLICATIONS FOR REGIONAL/COLLABORATIVE WORKING**

12. It is not felt there are any implications in relation to regional or collaborative working.

### **CONTACT OFFICER**

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### **SUPPORTING DOCUMENTATION**

Appendix A – Operation Waldhorn  
summary report.  
Appendix B – DCC J Feavvour's letter  
dated 4 September 2012.  
Appendix C – IPPC letter dated 29  
October 2012.

### **BACKGROUND PAPERS**

Operations Waldhorn Report  
(Confidential)

## **OPERATION WALDHORN**

### **Introduction**

'Operation Waldhorn' is the name given to a West Yorkshire Police investigation for an Independent Police Complaints Commission (IPCC) supervised enquiry commissioned in October 2011.

The investigation itself is borne out of an enquiry conducted by North Yorkshire Police relating to alleged criminal and disciplinary offences committed by serving West Yorkshire Police officers during the 1990's. The working title of the North Yorkshire Police investigation which itself was commissioned by the Criminal Case Review Commission (CCRC) was 'Operation Douglas'.

'Operation Douglas' commenced on 3<sup>rd</sup> November 2001 and concluded on 11<sup>th</sup> September 2006. No criminal charges were ever instigated against any of the accused officers despite consideration by the Crown Prosecution Service (CPS).

West Yorkshire Police also took no disciplinary action against the remaining serving officer's when the discipline file relating to the officers' alleged misconduct was considered by the Office of the Force Solicitors (OFS) in October 2006.

The principle purpose of 'Operation Waldhorn' was to review the decision making rationale and outcomes derived at by the original investigation and assess them in line with the terms of reference agreed by the IPCC and the commissioning officer Deputy Chief Constable (DCC) Mr John Parkinson of West Yorkshire Police. The aim was to identify any shortfalls, remedial actions and lessons learnt that could be implemented to improve the current working practices of West Yorkshire Police.



Terms of Reference for Operation Waldhorn:

- 1. Examine the decision making rational of the appropriate authority, considering the legal advice provided and any direction given to senior officers in relation to disciplinary matters concerning the actions of any person involved in the case.**

Findings:

- a) The Crown Prosecution Service decided that no criminal charges would arise from Operation Douglas and as such North Yorkshire Police compiled the discipline file.
- b) The accounts of the key stakeholders along with evidence gathered as part of 'Operation Waldhorn' and 'Operation Douglas' was independently reviewed by Deputy Chief Constable John Feavour of the Cambridgeshire Constabulary who is the Association of Chief Police Officer's (ACPO) lead for Professional Standards.
- c) DCC Mr Feavour considers that each decision made by The Force Solicitor and the then Head of Professional Standards Department, in respect of all five officers concerned to be reasonable, rational and entirely proportionate in the circumstances.

- 2. Review the written judgements issued by the Court of Appeal (Criminal Division) on 1<sup>st</sup> December 2009 and The Supreme Court on 20<sup>th</sup> July 2011 to establish whether there are any new aspects of police conduct which would warrant further action.**

Findings:

Upon completion of the review of relevant documentation it was concluded that the Criminal Cases Review Commission were in possession of all relevant material to enable them to make their decision. To date no new

aspects of police conduct, which would warrant further action, have been identified.

- 3. To examine current policy, practice and procedures regarding the management of CHIS with a particular focus on participating CHIS, and Protected Witnesses, to ensure that the integrity of these covert policing methods is fit for purpose.**

Findings:

- a) Key issues to address were identified as:

EXEMPTION S31 (1) (a) (b) (c)

- b) Since the original investigation it is fair to say that there has been a complete root-and-branch overhaul of procedures to safeguard against such failings and to prevent them from ever happening again.

EXEMPTION S31 (1) (a) (b) (c)

EXEMPTION S31 (1) (a) (b) (c)

As a result of the investigation, 8 recommendations have been made:

1. It is recommended, following the review by DCC Mr Feavoyour, that no further action is taken against any serving officer in relation to the misconduct previously identified by Operation Douglas.

EXEMPTION S31 (1) (a) (b) (c)

EXEMPTION S31 (1) (a) (b) (c)



**John Feavour DMS BSc Dip App Crim (Cantab)**  
**Deputy Chief Constable**  
**EXEMPTION S40 (2) (a) (b)**

**Your Ref: JP/rg**

**Our Ref: JF/bw/lett12/**

4<sup>th</sup> September 2012

John D Parkinson OBE  
Deputy Chief Constable  
West Yorkshire Police  
Command Team  
PO Box 9  
Laburnum Road  
Wakefield WF1 3QP

I am writing further to your letter of 20<sup>th</sup> June 2012, in which you ask me to review Operation Waldhorn on behalf of West Yorkshire Police. You subsequently forwarded three lever arch files containing evidential review documents, and in your letter as well as in those files you asked me to consider four specific questions in relation to potential police misconduct.

Firstly, I ought to explain the delay. **EXEMPTION S 40 (2) (a)**  
**(b)** However, I have in the last couple of weeks had the chance to properly review the files you sent through and I have come to some unequivocal conclusions in respect of the questions you asked.

I attach to this letter therefore, a brief report which sets out my professional experience in complaints and misconduct and the approach I took to the review and my conclusions. In those conclusions I offer some general observations and also cover the four specific questions upon which you asked for my view of.

In short having reviewed all of the material provided I have concluded that the decisions made by the then head of PSD and the force solicitor were entirely reasonable in the circumstances, and that no officer should have faced disciplinary proceedings. It follows that there is no case for any current serving officer to face any disciplinary proceedings.

**Cambridgeshire Constabulary Headquarters, Hinchingsbrooke Park, Huntingdon,  
Cambridgeshire, PE29 6NP**

Telephone: 101, Website: [www.cambs.police.uk](http://www.cambs.police.uk)

On an administrative note I have maintained the files securely in my office until you advise me either to destroy them or that you will collect them in due course.

Please do not hesitate to contact me if I can be of any further assistance.

John Feavour

**OPERATION WALDHORN EVIDENTIAL REVIEW, DCC JOHN FEAVYOUR,  
CAMBRIDGESHIRE CONSTABULARY, 3 SEPTEMBER 2012**

**1. Introduction**

- 1.1 My name is John Feavoyour and I am the Deputy Chief Constable of Cambridgeshire Constabulary. I have been a chief officer in Cambridgeshire for nine years, all but eighteen months of which I have been responsible for the professional standards portfolio within force. Beyond this I have for the last five years been the national ACPO lead for complaints and misconduct.
- 1.2 My experience within Cambridgeshire in relation to misconduct matters extends from being the lead officer for Sir Michael Bichard's public enquiry into potential failings around the Soham investigation, as well as directing many internal investigations into alleged misconduct by officers and staff at all levels of the organisation from constable to chief officer. On occasions where there has been sufficient evidence and in the public interest to do so I have prosecuted former officers resulting in their imprisonment, had officers dismissed for gross misconduct, put action plans in place for officers where circumstances mitigated against any other sanction and even taken no action following conviction at Crown Court of three officers because I was able to take account of comments made by the judge in that case. In short I am extremely experienced in matters to do with police misconduct.
- 1.3 In my national role I have provided a liaison point between ACPO and the IPCC, and on one occasion even set terms of reference for an investigation into the IPCC. I have also provided advice to several forces in respect of their response to misconduct critical incidents and I have also acted as a confidant to individual forces and the IPCC in sensitive matters.

**2. Operation Waldhorn**

- 2.1 In June 2012 I was asked by DCC John Parkinson of West Yorkshire Police to review the case of Operation Waldhorn. Operation Waldhorn arises from Operation Douglas, a previous investigation conducted by conducted by North Yorkshire Police on behalf of the Criminal Case Review Commission.
- 2.2 Operation Douglas examined the criminal cases that were constructed by West Yorkshire Police against a number of individuals and that with hindsight can now be seen to exemplify a wholesale failure on the part of some of the officers concerned in the original investigations to deal properly with informants.

**3. Terms of Reference**

- 3.1 The purpose of my review was set out in formal Terms of Reference to provide an independent review of the decision of the [REDACTED] that no officers would face disciplinary proceedings in line with the disciplinary regulations in force at time (2006).

540 (2)





3.2 Specifically DCC Parkinson asked me to consider the material and make recommendations regarding the following:

- i. An indication whether or not each decision made is considered to be reasonable, rational and proportionate in the circumstances made by [REDACTED] and [REDACTED] in respect of [REDACTED] S40 (2)
- ii. Consideration from the information provided whether any form of disciplinary action may have been appropriate against any of the named officers.
- iii. Consideration whether a discipline office could have been more likely than not substantiated against any officer involved.
- iv. Consideration that on the evidence provided that there is now a viable case for disciplinary action against those named officers who are still employed by West Yorkshire Police [REDACTED] S40 (2)

#### 4. Methodology

- 4.1 I have reviewed three lever arch files of documents provided to me by West Yorkshire Police. This included an introduction which set out the background to Operation Douglas and the investigation by North Yorkshire Police. It described that investigation and the subsequent referral through to the Criminal Cases Review Commission. The detail of the criminal justice processes was also set out including the conviction, appeals and subsequent reconvictions of the individuals concerned. This introduction alluded to wholesale abuse of appropriate and recognised systems for managing police informants and witnesses. The introduction concluded with terms of reference for my review and set out the four specific questions as mentioned above.
- 4.3 I was also provided with further documentation namely, what was described as List A and List B.

##### List A

- i. Discipline file submitted to West Yorkshire Police from Operation Douglas for the remaining officers.
- ii. Covering letter from [REDACTED] pertaining to the discipline file dated 3<sup>rd</sup> October 2006. S40 (2)
- iii. Response from [REDACTED] recommending no disciplinary charges against any officer with supporting rationale dated 12<sup>th</sup> October 2006. S40 (2)



- iv. Witness statement from [REDACTED] regarding his involvement in Operation Douglas. S40(2)
- v. Witness statement from [REDACTED] regarding his involvement in Operation. S40(2)
- vi. File Note ref: [REDACTED] produced by [REDACTED] S40(2)

**List B**

- vii. Advice files submitted to CPS for the officers involved in Operation Douglas and the reviewing lawyer's advice.
- viii. The CPS files are split into three parts as they were sent a different times throughout the duration of Operation Douglas.

Part 1: Refers to [REDACTED] S40(2)  
 Part 2: Refers to [REDACTED]  
 Part 3: Refers to [REDACTED]

- ix. Discipline events timeline
- x. A review of Operation Douglas by Sir Dan Crompton.
- xi. A case study review report of Operation Lancet.

4.4 I reviewed all of the above documentation making notes on some as I went through to try and understand the background and the context to the investigation. There is a great deal of detail in the files which I do not propose to rehearse here. However, I was struck by the comprehensive nature of the advice files which have been sent to the CPS and the point by point way in which the CPS lawyer had dealt with each of the potential criminal charges which could have been laid against a number of officers. I also noted in particular the review of Operation Douglas by Sir Dan Crompton and the Operation Lancet case study, elements of their conclusions being entirely relevant to the situation which faced me in reviewing this case.

**5. Observations**

5.1. Operation Douglas identified a whole raft of inappropriate conduct by a number of officers. However, after very careful consideration the CPS advised that no criminal matters should follow from the investigation. Subsequently the matter was considered in relation to potential disciplinary action and I was particularly struck by a comment by [REDACTED] when he wrote to [REDACTED] 12<sup>th</sup> October 2006 when in his opening paragraph he describes Operation Douglas as having revealed "a lamentable and systematic disregard for proper accounting procedures and the need to maintain a professional distance [REDACTED]". I believe this to be an excellent summary by [REDACTED] describing as it does

S40(2)  
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S40(2)



not only failing on behalf of the officers themselves but also, and importantly, a "systematic" failure on behalf of the organisation.

- 5.2 This systematic failure is important when considering whether or not misconduct proceedings should follow. It is wholly inappropriate in my view that the most junior officers in any part of the organisation should take full responsibility for their actions, even when they are inappropriate actions, in the absence of their managers also being held to account where it is apparent that those self-same managers condoned or, in any event, turned a blind eye to the misconduct concerned.
- 5.3 Indeed [REDACTED] turns to this very point in his next paragraph in the letter which I have already mentioned, when he says "that very senior officers routinely disregarded proper accounting procedures, thereby facilitating and condoning much of the abuse undertaken by the more junior officers...". S40(2)
- 5.4 In these circumstances an abuse of process argument is always likely to succeed. I say likely but not inevitable. An abuse of process argument must demonstrate a fundamental unfairness if it is to succeed and in his letter [REDACTED] [REDACTED] states simply that "it would be wholly untenable and an abuse of process" for disciplinary action to be taken against these junior officers. My reading of this comment is that he sees the abuse of process argument as inevitable; my own view is that it is highly likely and whilst I therefore feel that if falls short of being inevitable the conclusion which is reached by [REDACTED] is entirely reasonable. S40(2)
- 5.5 [REDACTED] goes on to describe how one other disciplinary matter was reported and seemingly dealt with at that time by a Superintendent. He is right to conclude that this matter should not be revisited. S40(2)
- 5.6 [REDACTED] then turns to matters said against [REDACTED]. Here the rationale used to conclude that no disciplinary proceedings can be justified relies on a number of factors including the absence of any direct financial benefit for the officer concerned. I cannot give any weight to this particular element as the absence of a personal financial gain cannot in my view be the determinant as to whether the officer's actions amount to misconduct. However, the other elements within the rationale applied to [REDACTED] [REDACTED] take my mind back to my earlier comments in relation to the difficulty of proceeding against the most junior officers when their supervisors, managers and in this case a chief officer would need to be held to account at least alongside a junior officer concerned. S40(2)
- 5.7 My only other observation by way of conclusion is in respect of the letter sent by [REDACTED] to [REDACTED] of 3<sup>rd</sup> October 2006, wherein in his final line he uses the phrase "it is my heartfelt opinion that there is insufficient evidence to consider disciplinary proceedings...". I do not understand, and I was surprised by reference to the term "heartfelt". My expectation would be that the [REDACTED] would provide an objective opinion based on the evidence and public interest concerned. I feel that the use of the word S40(2)



"heartfelt" on the other hand suggests some form of sympathy for the position the officers found themselves in, and actually detracts from what otherwise is a perfectly sensible conclusion to come to.

## 6. Conclusions

6.1 In bringing my thoughts together therefore, the officers under investigation had in the first instance been subject to careful consideration for criminal proceedings and on each and every aspect had such a course dismissed by the Crown Prosecution Service. In these circumstances I would only expect to proceed in relation to disciplinary matters where those matters can be said to be sufficiently distinct from the criminal allegations to make such proceedings justified. They are not. They are substantially the same and as such I would only expect to proceed with disciplinary matters where the activity concerned was blatantly or maliciously in contravention of force policies and procedure. In this last regard there are considerable difficulties precisely because of the involvement of more senior officers, and as [REDACTED] [REDACTED] says in his letter they had all long since retired. The time delay is also problematic if disciplinary proceedings were to have been contemplated. I have rehearsed my views in relation to the potential for an abuse of process argument and have concluded that whilst it is not inevitable it would have been entirely likely to succeed. S40(2)

6.2 Taking account of these conclusions I turn to the four specific questions which I was asked by DCC Parkinson as follows:

i. *An indication whether or not each decision made is considered to be reasonable, rational and proportionate in the circumstances made by [REDACTED] and [REDACTED] in respect of [REDACTED]* S40(2)

I consider that each decision made by [REDACTED] and the then [REDACTED], in respect of all five officers concerned to be reasonable, rational and entirely proportionate in the circumstances. S40(2)

ii. *Consideration from the information provided whether any form of disciplinary action may have been appropriate against any of the named officers.*

I consider that it would have been inappropriate for any of the named officers to have been subject to any form of disciplinary action for the reasons which I have set out in my conclusion above.

iii. *Consideration whether a discipline office could have been more likely than not substantiated against any officer involved.*

I consider that [REDACTED] could have faced disciplinary action in respect of his abuse of policy and procedures. I cannot conceive that he did not know that he had become too close to [REDACTED] and on my assessment of the S40(2) S40(2)





material in the bundle provided I believe that it is more likely than not that matters could have been substantiated against him amounting to misconduct. In the light of all the circumstances described in the evidential review file and the conclusions which I have come to, I consider that a sanction in the terms of a reprimand or a written warning would have been appropriate should such a matter have been found against him. It is my view that no disciplinary offences would have been more likely than not substantiated against any of the other officers concerned.

iv. *Consideration that on the 2 evidence provided that there is now a viable case for disciplinary action against those named officers who are still employed by West Yorkshire Police* [REDACTED] 540(2)

There is no viable case for disciplinary action against either [REDACTED] [REDACTED] 540(2)

5.10 I offer these final observations in closing; the Operation Lancet report was one of the catalysts for the work by William Taylor CBE QPM, which led to the changes in the police conduct regulations enacted in 2008. In my words he sought to ensure that the most serious misconduct – gross misconduct - should be dealt with expeditiously and where that conduct is so serious that dismissal is justified, then the officer should lose their job. However, his overarching concern was that where mistakes were identified including systematic failings of the organisation, then matters should be brought swiftly to a conclusion and appropriate learning taken on board with a view to improving the organisation and its method of operation. I cannot conceive that West Yorkshire Police has other than long since taken steps to address the failings identified by Operation Douglas and any suggestion of any misconduct proceedings should have a very firm line drawn underneath it and the matter closed.

John Feavoyour  
4<sup>th</sup> September 2012



Our reference number:  
Your reference number:

**ipcc**

independent  
police complaints  
commission

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T/CC John Parkinson  
West Yorkshire Police  
PO Box 9  
Wakefield  
West Yorkshire  
WF1 3QP

29 October 2012

Dear T/CC Parkinson

**IPCC supervised Investigation of Operation Waldhorn**

S40(2)

Thank you for [REDACTED] report about the above investigation. My role in supervised cases is to monitor the progress of the investigation against an agreed investigation plan and terms of reference. Having considered the report, I confirm that the terms of reference, agreed at the outset, have been satisfied. My supervisory responsibility is now at an end.

Yours sincerely

S40(2)

[REDACTED]

S40(2)

[REDACTED]

**Independent Police Complaints Commission (IPCC)**

S40(2)

IPCC Contact:

[REDACTED]  
Senior Casework Manager

S40(2)

[REDACTED]

