



Inspecting policing
in the **public interest**

Police Integrity and Corruption

Greater Manchester Police

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To what extent has the force put in place arrangements to ensure its workforce acts with integrity?

There is positive leadership from the chief officer team and effective communication regarding standards and integrity which is understood by staff. There is a need to develop training, check understanding and ensure unprofessional behaviour is challenged by all members of the force. The force monitors its systems effectively and investigates misconduct robustly but there is more scope for preventative checks to identify potentially corrupt behaviour.

Summary

The chief constable provides strong leadership that encourages ethical and professional behaviour. Leaders and supervisors are committed to high standards of behaviour but some staff do not always feel able to challenge and report unprofessional behaviour. Some progress has been made around the Code of Ethics but this needs to be developed further to ensure that the programme reaches all staff and awareness is assessed.

The professional standards branch (PSB) is well managed with effective processes and governance, but some routine checking processes are not being completed. There is effective investigation of complaints and allegations and the referral of cases to the IPCC is well managed, but learning from cases is not effectively filtering through to frontline staff.

The counter-corruption unit (CCU) is effective and the governance structure is strong. Individuals in specialist positions are vetted to the correct level and computer software is used to monitor force systems. The force completes intelligence-led drug testing but does not test on a random basis.

What progress has the force made on managing professional and personal relationships with integrity and transparency, since HMIC's December 2012 report?

There has been progress in communicating and explaining the outcome of the integrity review to members of the force.

A significant proportion of force staff (70 percent) have accessed an electronic briefing package and there has been a notable increase in reports of notifiable associations and other required integrity reporting.

There has been similar improvement in staff understanding of the force policy on media contacts.

What progress has the force made in communicating and making sure staff knew about ethical and professional behaviour to all staff, including the new Code of Ethics?

There is effective communication from the chief constable and the chief officer team using a combination of 'road show' events, online information, regular station visits and presentations to raise awareness. Members of the force understand professional boundaries.

The force needs to promote lessons learned in previous cases. The force also needs to understand more about public perceptions of the force in terms of integrity.

How well does the force proactively look for, and effectively challenge and investigate misconduct and unprofessional behaviour?

The force has efficient monitoring systems in place to identify unprofessional use of force information.

Staff are aware of their requirement to challenge unprofessional behaviour but this does not always occur and the force needs to carry out work to reinforce standards around challenging inappropriate and unprofessional behaviour.

How well does the force prevent, identify and investigate corruption?

The force carries out effective vetting for senior posts and uses risk analysis to identify staff who are vulnerable to corruption. The force undertakes comprehensive risk analysis to identify threats and harm from corruption.

There are effective processes in place to direct investigations but the force needs to examine the flow of intelligence it receives about corrupt officers.

What progress has the force made on managing professional and personal relationships with integrity and transparency, since HMIC's December 2012 report?

What progress has the force made in communicating and making sure staff knew about ethical and professional behaviour to all staff, including the new Code of Ethics?

How well does the force proactively look for, and effectively challenge and investigate misconduct and unprofessional behaviour?

How well does the force prevent, identify and investigate corruption?

The force uses fast track dismissal where necessary and takes effective steps to monitor the timeliness of misconduct investigations.

Social media sites are regularly monitored to identify unprofessional use.

The force no longer conducts random drugs testing. This needs to be re-instated to detect and deter substance abuse by members of the force.

The force needs to carry out cross-referencing of databases and other records to identify potential areas of concern.

The force/constabulary in numbers

Complaints

Total public complaints against officers and staff,
12 months to March 2014

1531

Total public complaints against officers and staff,
12 months to March 2014, per 100 workforce

14.0

Total public complaints against officers and staff,
per 100 workforce – **England and Wales**

15.7

Conduct

Total conduct cases against officers and staff,
12 months to March 2014

285

Total conduct cases against officers and staff,
12 months to March 2014, per 100 workforce

2.6

Total conduct cases against officers and staff,
per 100 workforce – **England and Wales**

2.6



Business interests

Applications in 12 months
to March 2014

132

Approvals in 12 months
to March 2014

128



Resources

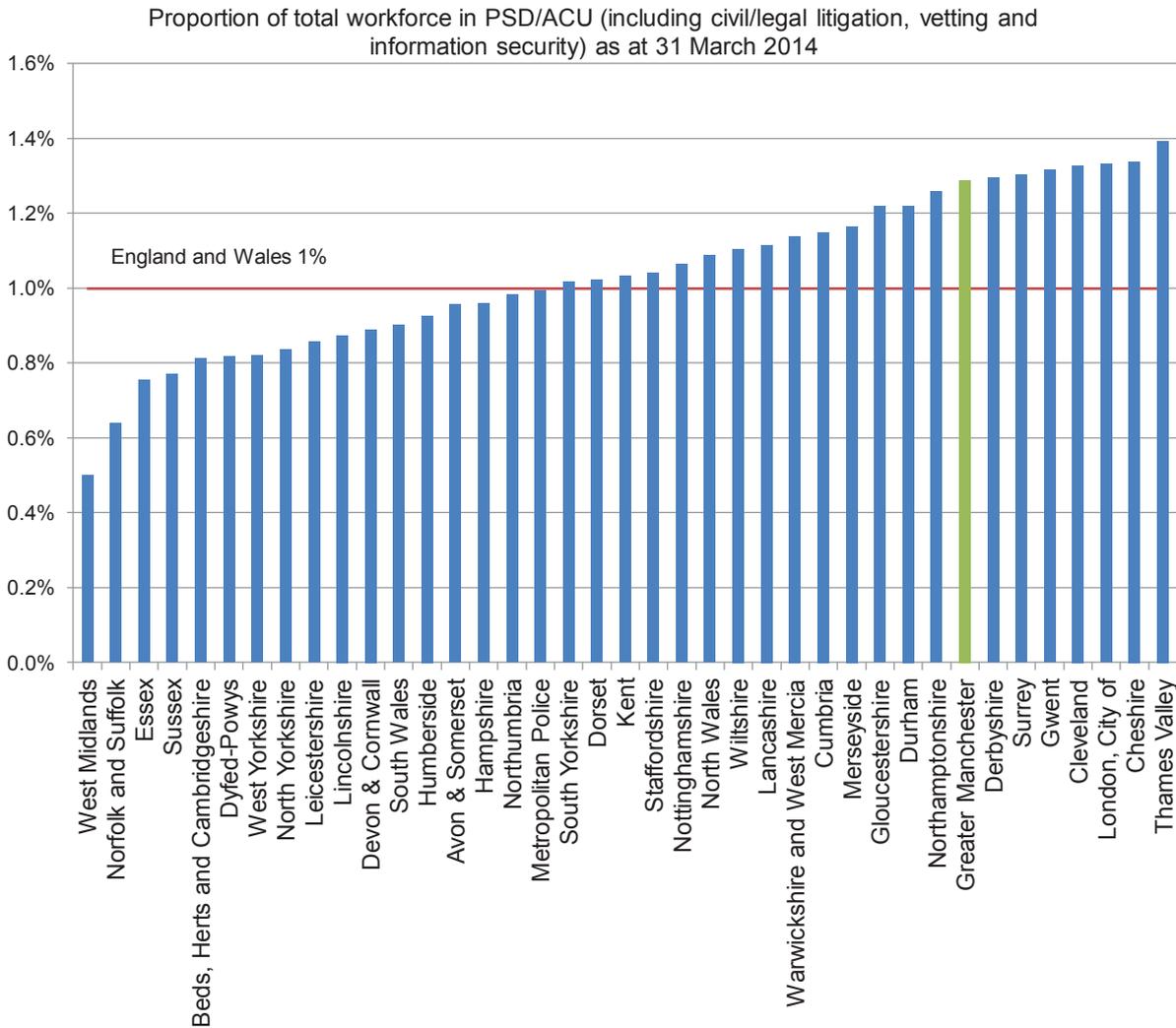
Proportion of workforce in
PSD/ACU

1.3%

Proportion of workforce in
PSD/ACU
– England and Wales

1.0%

Information above is sourced from data collections returned by forces, and therefore may not fully reconcile with inspection findings as detailed in the body of the report.



The chart above is only indicative of the proportion of force's workforce that worked in professional standards or anti-corruption roles as at the 31 March 2014. The proportion includes civil/legal litigation, vetting and information security. Some forces share these roles with staff being employed in one force to undertake the work of another force. For these forces it can give the appearance of a large proportion in the force conducting the work and a small proportion in the force having the work conducted for them. .

Introduction

During HMIC's review of police relationships, published in 2011 as *Without fear or favour*¹ we did not find evidence to support previous concerns that inappropriate police relationships represented endemic failings in police integrity. However, HMIC did not give the police service a clean bill of health. We found that few forces were actively aware of, or were managing, issues of police integrity. We also found a wide variation across the service in the levels of understanding of the boundaries in police relationships with others, including the media. Similarly, we found wide variation across the service in the use of checking mechanisms, and governance and oversight of police relationships.

During HMIC's 2012 progress report, *Revisiting police relationships*² we found that, while forces had made some progress, particularly with regard to the implementation of processes and policies to manage threats to integrity, more needed to be done. The pace of change also needed to increase, not least to demonstrate to the public that the police service was serious about managing integrity issues.

This inspection focuses on the arrangements in place to ensure those working in police forces act with integrity. Specifically, we looked at four principal areas:

- (1) What progress has been made on managing professional and personal relationships since our revisit in 2012?
- (2) What progress has the force made in communicating and embedding ethical and professional behaviour to all staff?
- (3) How well does the force proactively look for and effectively challenge and investigate misconduct and unprofessional behaviour?
- (4) How well does the force prevent, identify and investigate corruption?

In May 2014, the College of Policing published a Code of Ethics for the police service.³ As our inspections in forces started in early June 2014, it is unrealistic to expect that, at the time of the inspection, forces would have developed a full, comprehensive plan to embed the code into policies and procedures. We acknowledge that this is work in progress for forces and our inspection examined whether they had started to develop those plans.

A national report on police integrity and corruption will be available at www.justiceinspectors.gov.uk/hmic/ in early 2015.

1 *Without fear or favour: A review of police relationships*, HMIC, 13 December 2011. Available at www.justiceinspectors.gov.uk/hmic/media/a-review-of-police-relationships-20111213.pdf

2 *Revisiting police relationships: A progress report* HMIC, published 18 December 2012. Available at <http://www.justiceinspectors.gov.uk/hmic/media/revisiting-police-relationships.pdf>

3 *Code of Ethics - A Code of Practice for the Principles and Standards of Professional Behaviour for the Policing Profession of England and Wales*, College of Policing, July 2014. Available at <http://www.college.police.uk>

What progress has the force made on managing professional and personal relationships with integrity and transparency since HMIC's December 2012 report?

In our 2012 report, we highlighted a number of areas where the force could improve. These areas and our findings from this inspection are set out below.

- (1) To inform staff about changes following the integrity health-check carried out by the force.
- (2) To provide updated training for some staff in relation to the media and raise awareness of key issues with the workforce.
- (3) To provide integrity training for the workforce and check understanding.

The force has made progress in developing policies regarding integrity issues and ensuring that staff are aware of those policies. The force has issued a handbook to all staff called 'Keeping staff safe, keeping our force professional, being professional'. The handbook simplifies a number of key force policies relating to integrity, including the business interest policy, as well as providing information about notifiable associations. There has since been a significant increase in the registration of notifiable associations. HMIC found that business interests are well recorded. The force has also made use of a computer-based learning package to develop knowledge in this area. Some 70 percent of staff have accessed the course and interviews with staff confirmed that they understood their responsibilities.

Progress in relation to media training has been ongoing. Individuals from each division have been appointed as staff communicators. Senior officers now record contacts and relationships with people in the media which are recorded through the 'notifiable associations' procedure.

The force has jointly delivered a series of briefings with the Police Federation on standards, ethics and integrity.

What progress has the force made in communicating and embedding ethical and professional behaviour to all staff, including the new Code of Ethics?

Leadership and governance

There is evidence of leadership from the chief constable, demonstrated by his road shows and intranet blog. The chief constable also regularly visits police stations across the force to reinforce his message.

Officers and staff are aware of the boundaries of professional behaviour and understand how it affects both the public and their colleagues. The professional standards branch (PSB) and the police federation have carried out a series of presentations to staff across the force to heighten awareness. An online training package has been completed by the majority of staff and further training on standards is planned.

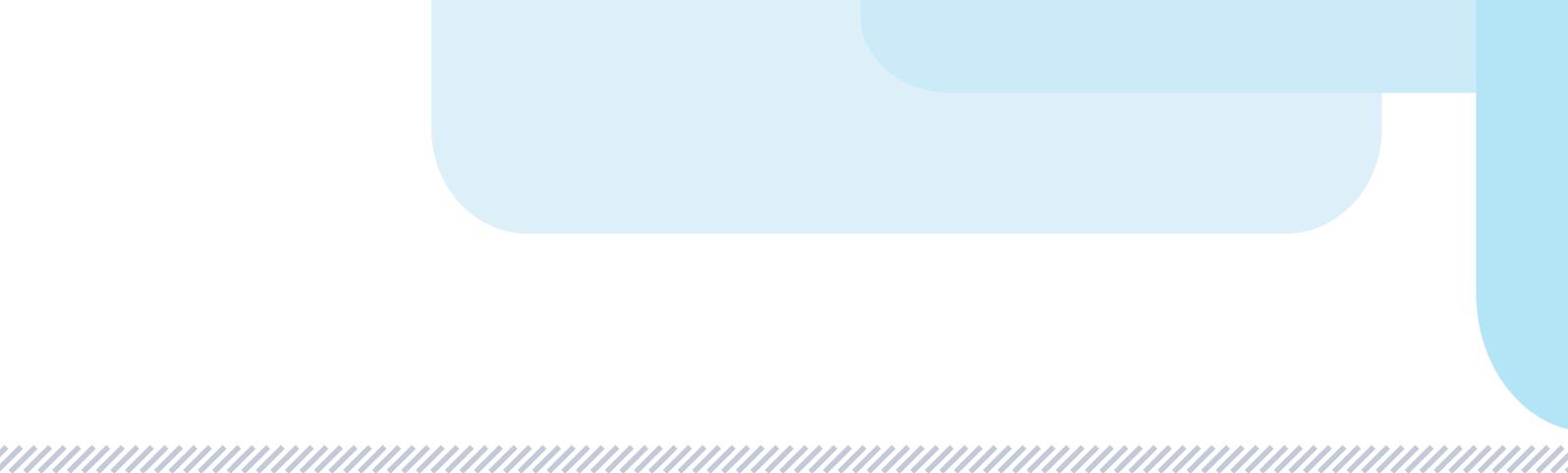
HMIC found that most leaders, including first line supervisors, lead by example and promote and encourage ethical behaviour. Levels of awareness relating to conduct, both within and outside of the workplace, are checked on a regular basis. The perception amongst staff is that leaders and supervisors in the organisation are committed to ethical behaviour.

The force has developed plans to communicate and instil the new Code of Ethics but this has not yet been rolled out. The force recently held an all-day meeting for its senior leaders which addressed ethics and values.

Confidential reporting mechanisms are available using the force intranet which is supported by force policy. The force received two hundred reports from staff in the last year, demonstrating a willingness to report wrongdoing even where some behaviour is not challenged at the time.

Some staff associations however, questioned whether unethical and unprofessional behaviour is always appropriately recorded and challenged. It was reported that some managers were reluctant to deal with individuals that they had responsibility for. This has led to officers in minority groups, reporting through their staff associations, a lack of confidence that they will be treated fairly if they highlighted unprofessional or discriminatory behaviour. A booklet has been issued to all staff which makes clear their responsibility to challenge behaviour that falls below the expected standard, the force needs to increase confidence in the willingness of staff to confront and challenge unprofessional or discriminatory behaviour and to clearly demonstrate that staff who report wrongdoing are fully supported.

The chief officer team provides information to the police and crime commissioner (PCC) which enables governance and accountability on integrity issues (including misconduct and unprofessional behaviour). The force provides the PCC with quarterly reports from PSB and regular updates on counter-corruption work.



Chief officers monitor integrity matters at their governance meeting. This includes discussion about corporate charitable donations, lessons learned and outstanding cases. The assistant chief constable responsible for standards also chairs the 'professional standards committee' where standards and conduct are discussed in detail.

Where action is necessary to improve processes or develop new methods, the force produces an action plan with clear objectives, timescales and milestones. The professional standards committee monitor the progress of the actions and hold people to account for effective and timely responses.

Understanding integrity

The PCC has recently established an independent ethics committee and to support the work of the committee a senior leader within each division and branch is nominated as a single point of contact to lead on work regarding the Code of Ethics and professional standards.

HMIC found the force carries out some survey work to assess levels of public satisfaction. It is not clear whether this is also used to develop information about perceptions about integrity or unprofessional behaviour.

Details of occasions where members of the workforce are offered gifts or hospitality are recorded in a central register. The force has made a significant effort to ensure that staff are aware of the requirements of the gifts and hospitality policy. The counter-corruption unit (CCU) conduct an audit of the register on a monthly basis and any incomplete or vague entries are challenged appropriately.

Details of all occasions where officers and staff have applied for authorisation for business interests are recorded in a centrally held register. This also includes details where applications were refused. HMIC found that authorised applications were not reviewed at regular intervals and it is therefore possible that the record may not be up to date.

HMIC found that rejected business interest applications are not routinely followed up to ensure compliance, however the force does act upon specific intelligence.

How well does the force proactively look for, and effectively challenge and investigate misconduct and unprofessional behaviour?

Misconduct and unprofessional behaviour

The force's policies and guidance explains what constitutes misconduct and unprofessional behaviour and describe acceptable boundaries and the standards expected of staff in their private and professional lives. These policies are reviewed at least every two years.

There is a force policy outlining the obligation to declare any change in circumstances in the personal associations and relationships of staff. The policy requires that members of the staff report any association with persons with a criminal record or other background which may suggest a risk of corrupt practice. A comprehensive briefing on notifiable associations and the reporting requirements has been provided to all staff through a computer-based learning package.

HMIC consistently found members of the force are aware of their obligations in this regard and there has been an increase of reports following the briefing. Reports received are investigated and where appropriate the member of staff is required to take steps to reduce or modify their contact with the person concerned.

The force includes consideration of previous conduct in the decision-making process for transfer to specialist roles and promotion for all positions. This includes applications for the strategic command course and the high potential development scheme. All people selected for promotion are first vetted by the CCU.

The force publishes the gifts and hospitality register, chief officers' expenses and business interests on the GMP website.

Cases are appropriately referred to the IPCC. All referral decisions are made by the PSB senior leadership team. HMIC found that the referrals are in line with statutory guidance. Voluntary referrals by the force were also found to be appropriate.

The force makes use of fast-track dismissal where appropriate. This has been used on four occasions since 2012 for instances where police officers have been convicted with criminal offences.

Professional standards training and resourcing

The force circulates the bulletin produced by the IPCC (Independent Police Complaints Commission). HMIC found limited knowledge of the bulletin among staff and it was not clear that the opportunity for learning from this is taking place, particularly amongst frontline staff and supervisors. This is an area that needs attention to ensure lessons arising from past misconduct cases are understood by officers and staff.

Recommendation

Within six months, the force should ensure it has an effective process to communicate to all staff, both locally and nationally identified lessons to be learnt on integrity and corruption.

The computer-based learning package on integrity developed by the force has been seen by the majority of staff members. The interview process identified a good understanding of obligations in this regard.

The National Decision Model (NDM) is in use at all levels in the force. Interviews with police officers and PCSOs from across the force indicated a good level of knowledge and understanding of the NDM although not all police staff are trained to understand its application. There is no routine NDM training to support all police staff in their decision-making and HMIC found limited evidence that the model was being applied to ethical issues. The model is not yet being effectively linked to the Code of Ethics.

The force carries out training on ethical and professional behaviour but it is not provided to all staff, nor is it done regularly. The force recognises that more training is required to supplement the computer-based learning package already available and more training is being developed and planned. HMIC found that there is no mechanism to check the understanding of staff or to identify how training develops staff or changes their behaviour. Improvement is required to ensure training on the Code of Ethics is provided for members of the force and that the effects of this training are tested and assessed.

Staff in the PSB and CCU receive regular training for their roles. All officers of the rank of detective inspector and above are trained as senior investigating officers. The investigators in the PSB are PIP (professional investigation programme) accredited and there are suitable skills and experience amongst police staff investigators.

Succession planning takes place to ensure consistency and continuity in the PSB and CCU. HMIC found evidence that the force was aware of forthcoming retirements within the PSB and CCU. Appropriate plans are in place to fill those places vacated.

PSB is sufficiently resourced and qualified to enable a proactive and preventive capability although more proactive work is needed in relation to reviewing compliance with restrictions on reported business interests. At the time of the inspection there were no vacancies within the PSB.

The force conducts regular reviews of misconduct hearings. There is a clear process to identify lessons learnt, but it is not always effectively communicated to members of the force.

Quality assurance

The force is taking action to improve the timeliness of misconduct investigations by directing local commanders and heads of department to deal with the less serious allegations.

Ethical and professional behaviour has been incorporated into relevant policies and procedures and most force policies have been reviewed over the last two years.

The force maintains that all staff, irrespective of rank or role, are treated fairly and equally in terms of how investigations are assessed, recorded, investigated and the level of sanction imposed. A review of a sample of misconduct files carried out during the inspection found that severity assessments had been completed in all cases but there was a lack of consistency in their recording. A review of case files showed fair and equitable treatment of staff in those cases. (We conducted a review of a small number of PSB cases. This included reviewing up to ten randomly selected cases involving serious misconduct or criminal conduct. The aim was to check on timeliness, supervision and appropriateness of decision-making).

The force has commissioned work to examine proportionality which has shown that officers from a black or minority ethnic background are more likely to be complained about by the public and/or reported for misconduct in the workplace. The force is considering the results of the study.

Misconduct hearings are carried out in a manner that ensures transparency, effectiveness, efficiency and legitimacy, including the use of an appropriately qualified presiding officer, who is independent of the person investigated. The force has used an external trainer from the Home Office to provide instruction for staff involved in misconduct hearings. All hearings are arranged through the assessment unit within the PSB to ensure a consistent approach. Checks are done before selecting presiding officers to ensure complete independence.

The force regularly reviews and audits decisions made at hearings resulting from allegations of misconduct or unprofessional behaviour. Where an officer is not dismissed, there will be a detailed review to assess whether it was appropriate to send the case to a hearing in the first place and to understand the reasons behind the outcome.

Regular audit takes place to ensure that investigations are justifiable, dealt with at the right level, and escalated or de-escalated appropriately. HMIC found that chief inspectors in the PSB regularly review the severity assessments to ensure that investigations are dealt with at the right level.

The force has processes to ensure the timeliness and quality of all investigations conducted whether they are carried out by PSB or another department. There is a bi-weekly meeting involving PSB and the lead chief officer where updates are given in relation to trends and individual cases.

The PSB oversees police staff investigations carried out by other departments including HR or local divisions. To enable this to be carried out PSB includes a police staff member dedicated to overseeing police staff investigations. This provides an effective process and has encouraged positive links with other departments in the force.

How well does the force prevent, identify and investigate corruption?

Corruption investigation

The force proactively identifies and manages threat, risk, and harm from corruption. This is part of a governance structure which includes the assessment of risk, proactive action to mitigate risk and monitoring procedures. Actions are tracked and action owners held to account. The CCU is part of the PSB and reports to the professional standards committee. A risk assessment process is used to assess risk, in accordance with recognised professional practice.

The head of the PSB chairs a confidential meeting each month to oversee and manage cases in progress. This process is comprehensive and effective. Counter-corruption matters are referred covertly to IPCC. HMIC found that the force does this consistently and effectively.

The force proactively identifies vulnerable staff or groups. The NCA (National Crime Agency) counter-corruption threat assessment and the transparency international integrity cycle is used as part of this process.

The CCU produces a comprehensive threat assessment, using as reference, the NCA strategic threat and risk assessment document. The force also uses information taken from the notifiable associations register to identify staff that may be vulnerable to corruption. Plans are developed to mitigate these risks. Vetting arrangements comply with the national vetting policy and identify corruption risks at the recruitment stage. Further vetting processes are completed for officers promoted to senior ranks or posted to sensitive/vulnerable roles.

The Head of the vetting department is part of the PSB senior leadership team and contributes to the strategic threat assessment. The force carries out appropriate checks on potential new employee and those with any identified links to known criminals are refused employment.

The CCU previews the shortlist for all promotions. HMIC found examples where the CCU or the ACPO lead for integrity have required changes in promotion selection processes to ensure integrity. A number of specialist posts such as staff in safeguarding teams and those working in the area of child sexual exploitation are also vetted.

The CCU monitors force systems. Social networking sites are routinely examined by the media department to identify any unprofessional content from members of the force. The force has a number of special methods which are used to protect its systems. These includes keystroke monitoring software which allows live time monitoring of any force terminal and software to prevent the download of information from force systems onto removable devices.

The force has used random and 'with cause' drug testing, and uses intelligence-led integrity testing to identify corruption. The results are circulated to the workforce. HMIC found that the force ceased using random drug testing two years on cost grounds and following very few positive outcomes. However the use and publication of the technique of random testing provides opportunities to deter substance abuse by members of the force.

Recommendation

Within six months, the force should ensure it has a policy on substance misuse and should also re-introduce random drug testing to identify and deter substance misuse. The force should communicate this to all staff.

The force ensures that organised crime investigations are not compromised and steps are taken to ensure forthcoming operations are protected from corrupt disclosures or other elements of misconduct. The head of the CCU is kept informed about organised crime group operations and is able to check vulnerability against the CCU database. Members of staff in the serious and organised crime unit are more rigorously vetted. HMIC found that these procedures are effective.

HMIC was satisfied with the procedures in place to protect data systems across the force. However, HMIC found security in relation to exhibits and case papers was less secure. At one police station, files were in a cabinet that was routinely left open both during the day and overnight. However, we did not find that counter-corruption unit and professional standards branch investigations were filed in this way and so were not compromised.

Intelligence

The force has considered but not yet implemented processes to cross-reference senior and chief officers' diaries against the gifts and hospitality register, service procurement or other databases to identify potentially corrupt links. Such a process would demonstrate integrity and more effectively encompass chief and senior officers in the audit and oversight processes already being used by the force.

The force proactively gathers intelligence on corruption and grades it in compliance with the relevant authorised professional practice (APP). There is a dedicated analyst in the CCU to examine trends in activity. One of the themes being examined at the time of the inspection was staff who take advantage of vulnerable victims of domestic abuse.

There are routine meetings where corruption issues are considered, recorded and reviewed and this process is set out in a comprehensive strategic threat assessment.

However, HMIC found that while the overt reporting of wrongdoing is increasing, the level of intelligence being received in the CCU is reducing and the professional standards branch is working to understand why this is the case.

Intelligence gathered or received is analysed, graded and developed before action is taken. The strategic threat assessment identifies the process for responding to intelligence. Information is stored on an excel spreadsheet and is scored and weighted in a structured manner. This is an area of strength.

There is a co-ordinating mechanism in place at which corruption issues are considered, recorded and reviewed. The force holds a monthly counter-corruption meeting chaired by the head of PSB to track progress.

Actionable intelligence is acted upon and monitored through structured governance. The PSB tasking and coordination process is the governance structure through which intelligence is assessed. Governance for this process is provided by the chief officer lead.

The force has a process to identify multiple suspects and multiple offences by a single suspect. HMIC observed a specific example of how the force is proactive in maximising the number of suspects or offences identified through this process. One example involved an officer who was subject to an investigation for inappropriate sexual conduct. The force made contact with members of the public to identify further victims.

HMIC found there are sufficient resources to deal with the flow of intelligence. The intelligence department within the CCU is managed by a police inspector with eight dedicated staff and the unit was fully staffed at the time of the inspection.

Capability

The CCU has its own surveillance and technical support capability. There are also two financial investigators embedded within the team. There is capability to deal with digital forensic examination, however, computer hard drive examination is outsourced to an external agency if there are capacity issues within GMP.

The force is part of a counter-corruption agreement and works with Cheshire Constabulary and Merseyside Police to improve capability and capacity when required. The department has the capacity to investigate those that try to corrupt police officers and staff as well as those staff suspected of being corrupt.

The performance of the PSB and CCU are regularly monitored by the force, including the timeliness and quality of handling complaints, investigations, decision-making, outcomes and appeals. HMIC found that there are high levels of intrusive supervision from the chief officer lead. There is management information within the area of CCU. Information is supplied to the PCC on a quarterly basis and there is the covert and overt tasking meeting to ensure that actions are being delivered against. The head of counter-corruption has a clear and direct reporting line to the chief officer lead.

The force does not effectively ensure that lessons are learned and disseminated to officers and staff. The force recently sent a letter to all staff who have a registered business interest. This was as a result of an officer going to prison through his illegal activities in this area. HMIC found limited knowledge and understanding of the lessons coming out from counter-corruption work among members of the workforce.

Cases are appropriately referred to the IPCC in accordance with the statutory guidance. The senior leadership team within PSB makes the decision to refer matters to the IPCC. All CCU investigations are covertly referred.

Recommendations

- **Within six months, the force should ensure it has an effective process to communicate to all staff, both locally and nationally identified lessons to be learnt on integrity and corruption.**
- **Within six months, the force should ensure it has a policy on substance misuse and should also re-introduce random drug testing to identify and deter substance misuse. The force should communicate this to all staff.**