Inspecting policing in the public interest

Police Integrity and Corruption

Humberside Police

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

Humberside Police has made good progress in encouraging professional behaviour across the force. Chief officer leadership on integrity issues is clear, visible and recognised by staff. The force and the police and crime commissioner (PCC) have governance structures to ensure that integrity issues are effectively managed. Staff are aware of the boundaries of professional behaviour and understand the need to challenge inappropriate behaviour. Some staff feel uncomfortable challenging experienced or senior colleagues and also lack confidence in confidential reporting systems. Training is given on integrity issues and there are clear plans to communicate the new Code of Ethics.

Summary

Humberside Police has made good progress in encouraging professional behaviour across the force. Chief officer leadership on integrity issues is clear, visible and recognised by staff. The force and the police and crime commissioner (PCC) have governance structures to ensure that integrity issues are effectively managed. Staff are aware of the boundaries of professional behaviour and understand the need to challenge inappropriate behaviour. Some staff feel uncomfortable challenging experienced or senior colleagues and also lack confidence in confidential reporting systems. Training is given on integrity issues and there are clear plans to communicate the new Code of Ethics.

The force has made progress on updating policy to include integrity issues and on consolidating registers for gifts, hospitality and secondary business interests but this needs to be completed and published.

The force effectively investigates complaints and allegations of unprofessional behaviour in a timely manner and resources for the professional standards branch have been increased. The force also operates effective assessment processes to develop and grade intelligence. Corruption is effectively investigated by the anti-corruption unit, although the capacity to undertake proactive work is limited.

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

Four areas for improvement were identified in 2012.

The force has reviewed and updated some key policies, but others have not yet been reviewed or do not yet exist. The force needs to complete the review of policies to ensure they address integrity issues.

The force has made good progress in developing and implementing policy for contact with the media.

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 clear leadership from the chief officer team.

The force has effectively communicated the importance of integrity issues to staff.

The force needs to complete the centralisation of integrity-related registers and publish them.

The force needs to conduct research to understand how integrity issues affect public confidence.

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

The force has invested in its investigative capability.

Investigations are effective and timely.

The force has anonymous reporting mechanisms for staff to report wrongdoing; however staff are concerned that their anonymity may not be protected.

The force needs to identify opportunities to use fast track dismissal where appropriate.

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

The force has an effective anti-corruption capability.

The force has effective governance structures to ensure oversight of corruption issues.

The force effectively analyses and actions intelligence on corruption.

The force needs to identify opportunities to increase proactive investigation to uncover potential corruption.

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

The force has made good progress on communicating what constitutes acceptable use of social media to staff and monitoring compliance.

The force has made good progress on rolling out training on integrity issues to staff.

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/constabulary in numbers

Complaints

Total public complaints against officers and staff, 12 months to March 2014	**452**
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	**100**
Total conduct cases against officers and staff, 12 months to March 2014, per 100 workforce	**3.1**
Total conduct cases against officers and staff, per 100 workforce – **England and Wales**	**2.6**

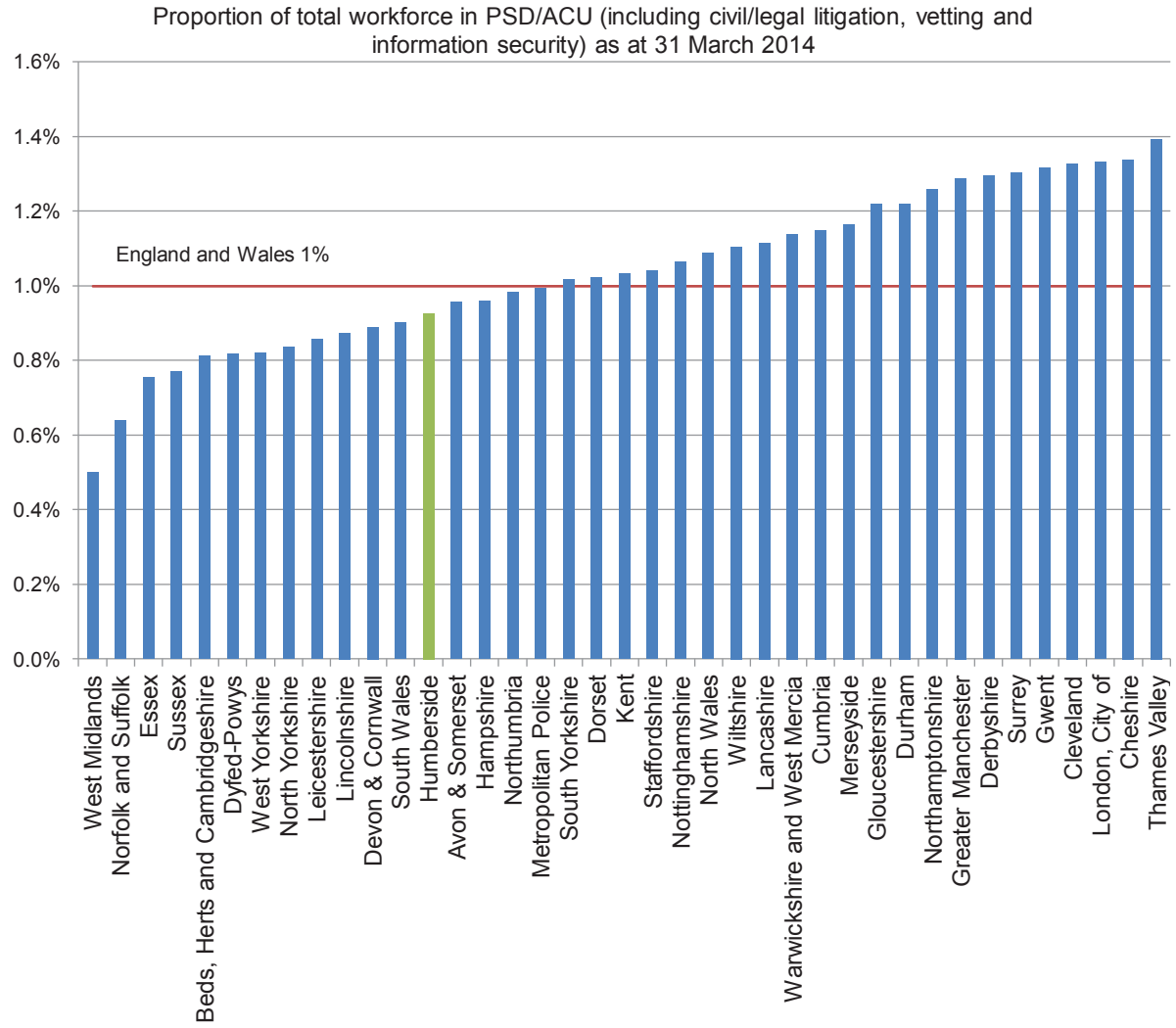
Business interests

Applications in 12 months to March 2014	155
Approvals in 12 months to March 2014	152

Resources

Proportion of workforce in PSD/ACU	0.9%
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.justiceinspectorates.gov.uk/hmic/** in early 2015.

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1 *Without fear or favour: A review of police relationships*, HMIC, 13 December 2011. Available at **www.justiceinspectorates.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.justiceinspectorates.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?

HMIC's inspection of the force in 2012 identified the following four areas as requiring improvement:

(1) Several policies (covering relationships with the media, acceptance of gifts and hospitality, social media use and police officers having second jobs) have been updated or are in the process of being reviewed, although more needs to be done to let staff know about this.

(2) The force has updated its media policy but HMIC found that staff did not know about these new rules.

(3) The force has very recently refreshed a policy on how police officers and staff should behave on social networking sites (such as Twitter and Facebook). However, the staff HMIC interviewed as part of the inspection were not clear about the rules. HMIC's independently commissioned research identified two cases of potentially inappropriate behaviour on Facebook or Twitter by officers and staff in Humberside, both of which have been referred back to the force.

(4) There has been no training on integrity issues since our last inspection. Changes to policy are communicated via email and intranet systems, but there is no mechanism to check that officers and staff have read and understood them.

In the first area, the force has made limited progress. There have been some recent communications but some policies are out of date and are generally only reviewed once every three years. There have been no moves to update policies for emerging issues or to adopt a standardised process. This means there is no review date or in some cases no record of human rights or equality impact. The force guidance needs to be in a standardised format with clear audit and review information. From 1 March 2012 a directive was issued for all practice and directions to be superseded by policy. However the inspection found that some were still practice and directions and had not been reviewed and turned into policy. They need to be reviewed more regularly and staff updated on changes.

In the second area, the force has made good progress. During interviews HMIC found that staff were aware of the process and guidance and were able to provide examples of how contact with the media is directed to the media and communications department.

In the third area, the force has made good progress. The social networking policy gives clear guidance in respect of the standards required as regards information posted to sites (Facebook, Twitter etc.). In addition advice can be obtained from the anti-corruption unit (ACU). During interviews, focus groups and reality testing staff stated that they had a clear understanding of the force policy and were aware of the types of information that should not be posted on social media sites. There were also examples where supervisors had monitored social networking site use by their staff.

In the fourth area, the force has made good progress. There has been a series of communications to improve staff understanding of the main areas of integrity. An integrity 'thread' has been included in training courses, road shows and briefings. There is a clear training package and scenario training to ensure that staff understand the various elements of integrity, perceptions and testing moral and ethical boundaries. There was also some evidence of supervisors checking with their staff to ensure they understood the issues.

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

Good progress has been made in encouraging professional behaviour across the force. Chief officer leadership for integrity issues (including misconduct and unprofessional behaviour) is clear, visible and recognised by staff, with clear messages. The chief constable has conducted road shows which, although primarily focusing on structural changes to the force, have also included inputs from the head of the professional standards branch (PSB) to create a climate of ethical behaviour and challenge. The message from the chief constable is about providing a service that reflects the needs of the public and allowing staff to use their professional judgement by 'doing the right thing in the right way'. There are also 'champions' within each division to ensure there is a consistent point of reference with whom staff can discuss issues that arise. Posters have been distributed throughout police stations to promote and raise awareness of the new Code of Ethics.

Officers and staff have an awareness of the boundaries of professional behaviour and understand how it affects both the public and their colleagues. Officers and police staff are aware of integrity issues and know what their professional obligations are and the consequences if they act unprofessionally towards either members of the public or their colleagues. They understand that the public expect professional behaviour and that unprofessional behaviour damages the force's reputation.

HMIC found evidence that most leaders, including first line supervisors, lead by example. Staff stated that sergeants and inspectors emphasise integrity issues during briefings, meetings and one-to-one personal development reviews. They demonstrate their personal commitment to professional behaviour by promoting and encouraging it. Some first line supervisors discuss issues with their staff to understand their perceptions of what the force expects of them in both their professional and private lives. However, this depends on individual sergeants and inspectors and is not consistent throughout the force.

The force is good at ensuring that unethical and unprofessional behaviour is appropriately challenged. Staff generally understand their individual responsibilities and are aware that if unacceptable behaviour is not challenged they could be viewed as complicit. However, some stated it depended on who they had to challenge as they felt uncomfortable challenging experienced peers and those above them in a hierarchical organisation, but stated they would report misconduct by such individuals to their supervisors.

There are clear plans to communicate effectively and embed the new Code of Ethics. The deputy chief constable (DCC) has been clear and wants a local, hard-hitting campaign and the integrity and transparency action plan outlines this. There is a strategy with a work stream specifically to introduce and embed core values and the new Code of Ethics. It has been designed to bring the new Code of Ethics to life using real cases to illustrate issues and personalise the training by using ethical scenarios. There are over 100 ethics and culture 'champions' in place to support the campaign to raise awareness.

There is a clear force policy outlining what are 'inappropriate associations' and the obligation for staff to declare any changes to their circumstances. Staff are reminded not to use police databases to check individuals they may have an association with if they think that association may be inappropriate or notifiable. They should speak to their supervisor and report the details to the PSB; the head of the ACU then decides whether the association is appropriate and what action may be necessary. During reality testing HMIC found that staff were aware of the policy and how to self-report relationships. Staff could not recall any specific briefings but knew where to find the guidance.

The DCC and the head of the PSB provide information to the PCC to enable effective governance and accountability on integrity issues including misconduct and unprofessional behaviour. The information is provided during the PCC's governance board, including details of PSB strategic assessments and ongoing cases. The PCC also has an overview of the PSB governance function with staff from the office of the police and crime commissioner (OPCC) dip sampling cases that involve national issues.

Integrity issues including misconduct and unprofessional behaviour are actively monitored by chief officers at governance meetings that allow them to understand fully the issues and identify the need for action. There are a number of governance meetings chaired by the chief officer team, for example the People Board chaired by the chief constable and the force Integrity Board chaired by the DCC, which identify and progress lesson learnt. There is a documented control strategy which is used to ensure that lesson learnt are implemented.

The force has a new action plan called the Humberside Police Integrity Programme and Embedding the Code of Ethics. This was produced in June 2014 with specific objectives, action owners, timescales, updates and links to other work streams. There is a governance structure to hold action owners to account and track the progress of the work streams.

Understanding integrity

The force has carried out limited work to understand how integrity issues including misconduct and unprofessional behaviour affect public trust. Although the force does carry out internal surveys with staff, they are currently in the process of developing an external survey with the OPCC. A telephone survey has been carried out to establish public perception and confidence in policing but no surveys have been conducted to understand integrity issues.

Where staff have accepted either gifts or hospitality, this is recorded in the gifts and hospitality register. There is a separate register for chief officers' gifts and hospitality. At the time of the HMIC inspection the force was in the process of combining the separate registers. Neither register includes details of whether the gift or hospitality was accepted. HMIC did not find any evidence of gifts or hospitality being challenged or of regular auditing of the registers. The public access link for the expenses of chief officers only covered the period up to March 2013 and no other expenses have been published on the website where the public could access them. The PCC stated he was aware that chief officer expenses should be available for public scrutiny. The DCC proposes that the ethics committee should challenge the appropriateness of any gift or hospitality. Staff interviewed by HMIC were cautious of accepting anything that could be construed as hospitality, some stating they were inclined to record cups of tea they had accepted, which reflects a lack of real understanding of the ethical issues in this area. They were not aware of making a record when either a gift, gratuity or hospitality had been offered and declined. HMIC found that limited analysis is carried out to identify trends in relation to integrity issues. There is no cross-referencing or checking of chief officers diaries with registers such as the gifts and hospitality register.

Recommendation

Within six months, the force should ensure that it has a policy which informs staff of the gifts and hospitality that are appropriate to accept and why. The policy should include the requirement to register the value and description of all gifts and hospitality offered, including those declined. This should be communicated to all staff.

Within six months, the force should ensure it carries out regular audits of integrity-related registers including gifts and hospitality, business interests, notifiable associations, expense claims, procurement activity and other records to identify potentially corrupt activity.

The PSB holds a central register of applications by officers and staff for authorisation of a secondary business interest, including charity work. The register includes cases where the application was rejected. There is an appeal process to the DCC for applications that are rejected. Line managers annually review secondary business interests during individual personal development reviews. Applications that are rejected are not followed up unless there is specific intelligence to suggest otherwise. Business interests are published covering all officers up to and including the rank of superintendent and the equivalent rank for police staff, and was last updated in 2012.

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

Misconduct and unprofessional behaviour

Misconduct and unprofessional behaviour are considered in the decision-making process when transferring to some specialist roles or applying for promotion. Conduct and attendance records are also considered for specialist roles (for example firearms). This process takes performance and conduct records into account when posting staff. There is uncertainty over whether misconduct and unprofessional behaviour is considered for individuals applying for the strategic command course or the high potential development scheme.

The force ensures that all staff, irrespective of rank or role, are treated fairly and equally in terms of how investigations are assessed, recorded, investigated and sanctions imposed. Police staff investigations come under the remit of PSB to ensure consistency and fairness. The force uses the National Decision Model (NDM) as part of the decision making process and all cases are assessed for severity and proportionality by a detective chief inspector (DCI) in the PSB. There are weekly meetings between representatives from the PSB and legal services where considerations are recorded and the progress of investigations is monitored. HMIC dip sampled fifteen case files and found that the vast majority had been dealt with correctly and fairly, with the decision or sanction being justified by the evidence available.

The force has a confidential mechanism for staff to report wrongdoing known as 'Bad Apple'. This is linked through the force intranet system and protects the anonymity of the person reporting. Staff can also visit or e-mail the PSB directly. Policies and practice direction are on the force intranet system. During reality testing HMIC found that staff seemed to have a good understanding of the process and attention is appropriately drawn to the Bad Apple reporting mechanism. However, the vast majority of staff interviewed by HMIC were not convinced of its anonymity due to it being linked to the force IT system. To access the system members of staff have to login using their individual user identification and password, therefore they had concerns of how anonymous the systems actually is.

The force responds to reports of wrongdoing by staff in an effective manner. The detective chief inspector (DCI) monitors the timeliness and has regular contact with the local owner for each investigation. The force operates a traffic light system to show how each investigation is progressing. Sometimes delays can occur, for example advice may be required from the IPCC (Independent Police Complaints Commission) or Crown Prosecution Service (CPS).

HMIC are satisfied from the number of files dip sampled that cases are being appropriately referred to the IPCC. The DCC stated that the force takes a cautious approach and tends to refer more cases to the IPCC than it needs to.

The force actively uses the IPCC bulletin to disseminate learning but does not encourage or collate responses. The force uses its intranet link (guidance and information) to update staff. HMIC found during reality testing staff were able to show where the links were and how they accessed them.

Professional standards training and resourcing

Staff who work in the PSB or the ACU receive training for their roles. The ACU carries out a skills gap analysis and provides training to improve skills. Specialist analysis and crime training is provided within Humberside and other training has included the national professional standards course delivered by the College of Policing. All ACU staff are accredited to professionalising the investigation process (PIP) standards.

Succession planning takes place to ensure consistency in the ACU. The force has identified the skills required for posts and is in the process of identifying staff to fill these. Some of the staff in the PSB and ACU are retired police officers who have a range of skills and experience to draw upon.

Some staff have received training on the NDM which is part of the curriculum in other courses such as firearms and officer safety training. However, this did not include all staff. The force proposes to develop a new NDM training package which will include the new Code of Ethics, the forces statements of values, and the THRIVE (threat, harm, risk, investigation, vulnerability, engagement) principles, and to deliver this to all their staff to use as a daily decision-making guide regardless of their roles. HMIC found that staff who had received the NDM training tended to use it as part of their daily decision making.

Training on ethical and professional behaviour is regularly delivered to staff and is supplemented through workplace coaches and champions who represent various ranks and grades. Although the force states that training includes unconscious bias and recognising dilemmas as part of other training courses, HMIC found that staff could not recall this.

The PSB has made a successful business case for three additional members of staff to be recruited. Although the PSB currently has the capability it does not have the resources to be proactive but the additional posts should address this. Conduct and complaints investigations currently take precedence over proactive work.

Misconduct hearings are conducted in a manner that ensures there is transparency, effectiveness, efficiency and legitimacy. This includes using appropriately qualified presiding officers, who are independent of the person investigated. The presiding officers are of ACC rank. The force does make use of fast-track dismissal process.

Quality assurance

The force audits decisions in hearings and meetings resulting from allegations of misconduct or unprofessional behaviour against officers and staff, through the professional standards board (PSB), chaired by the DCC. The information is provided to the PCC every quarter, but only published internally. However, there is a proposal for them to be made available for the public.

Regular audits take place to ensure that investigations are justified, dealt with at the right level and escalated or de-escalated appropriately. There is oversight of all PSB work led by the DCC through the force integrity board. There are also a number of other structures for governance, for example the integrity delivery group chaired by the head of the PSB, the inappropriate sexual conduct group chaired by the chief constable, the conduct and capability group chaired by the ACO (HR), the equality, diversity and human rights group and the people board both chaired by the chief constable, and the independent ethics panel. Problem profiles are undertaken to highlight particular issues such as abuse of police powers and complaints of discrimination. However, the PCC had no knowledge of the auditing arrangements and stated that he would ask for this information at the governance and oversight meetings.

The force has processes to ensure the timeliness and quality of all investigations conducted in relation to officers and staff, whether they are carried out by PSB or another department (for example human resources (HR)) or division. ACU investigations are monitored fortnightly at the tasking and co-ordinating meeting. However, from the data submitted by the force, some local resolution cases exceeded 60 days and took up to 120 days to resolve. The DCC emphasised that it was important for both the public and staff to reduce the time taken for cases to be resolved.

The PSB oversees police staff investigations carried out by other departments to quality assure standards of investigation, and ensure consistency and fairness to all staff. There is a process to record any learning. This oversight occurs through tasking meetings at which the PSB identifies what the learning is and disseminates it to the relevant department or divisions. Learning is also communicated through the guidance and information link on the force intranet. In some instances it is also disseminated by supervisors during briefings.

HMIC are not aware of any policy in the force that covers suspension, resignation and retirement during investigations. The chief constable and the DCC discuss this issue when it arises in order to balance fairness with organisational need, reputation and the interests of complainants. This is linked to the vetting procedures to ensure staff leaving have their reasons recorded. Police staff are not covered by police regulations and are entitled to resign prior to any hearing. The force have a protocol where, if a member of police staff going through a misconduct process decides to resign, wherever possible, a fact-finding interview and or a misconduct meeting / hearing is arranged before the person leaves.

Recommendation

Within six months, the force should publish a policy which clarifies the position on suspension, resignation and retirement of officers under disciplinary investigation.

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

Corruption investigation

The force regularly identifies and manages threat, risk, and harm from corruption as part of a governance structure, which includes the assessment of risk and some proactive action to mitigate risk. There is a PSB strategic assessment including both covert and overt intelligence. PSB adopt a national intelligence model (NIM) approach to the identification and management of risk from corruption. This takes account not only of the National Corruption Assessment (but also local and regional threats to develop a strategic intelligence assessment from which a control strategy has been developed. The procurement unit risk assesses suppliers including financial, tax issues and business continuity plans prior to engaging in or renewing any contract. The procurement unit is involved in tenders valued at over £50,000 but also provides advice for amounts below this threshold. The finance department monitors purchases where credit cards are used.

The force uses the National Crime Agency threat assessment to identify vulnerable staff that may be at risk of corruption. Analysis is undertaken to identify areas of risk using the collection of national case categories. Some monitoring of staff financial situations and inappropriate associations takes place but the pro-active capacity within the ACU is limited.

Vetting arrangements in the force comply with the national policy to identify corruption risks at the recruitment stage for officers and staff and is revisited on promotion to senior ranks and for postings to sensitive/vulnerable roles. However, the policy (practice direction) does not detail when re-vetting should be completed (for example by reference to levels, roles or promotions). The force has been re-vetting its entire staff and from the minutes of the PSB board meeting dated 20 March 2014 the vast majority of staff had been re-vetted with approximately 400 staff remaining. HMIC was told that higher levels of vetting are undertaken for those in sensitive posts and is also used in the promotion process.

The force monitors its systems and takes proportionate action when required. However, it does not monitor social networking sites. Advanced monitoring software conducts general trawls of the force IT systems. The information security officer position is currently vacant, as a result of which previous governance arrangements (the information security board and the technical security board) have stopped. This vacant position is not recorded as a potential risk on the risk register and could therefore place the force in a vulnerable situation.

The force uses ‘with cause’ drug testing. However, random drug testing is not currently carried out, having ceased approximately two years ago primarily due to cost and lack of positive results. The outcomes of any drug testing are not circulated to the workforce. There is the capability within the ACU to conduct intelligence-led integrity testing.

Recommendation

Within six months, the force should ensure it has a policy on substance misuse and 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 undertakes system checks, risk assessment and liaison with other agencies to prevent corruption. The force also has access to resources from outside of the force area to reduce the risk of investigations being compromised.

The force ensures the effective security of systems, exhibits and case papers by providing an 'in depth defence' approach that encompasses four main areas: physical security, personnel security, technical security, and policies and procedures.

Intelligence

The force carries out some analysis to identify trends for corruption. Analysts have access to the authorised professional practice (APP) manual to ensure that they comply with the practice guidance. Grading of intelligence follows the national intelligence model (NIM) 5x5x5 intelligence grading system. HMIC found during dip sampling of intelligence reports that they had been appropriately analysed, graded, developed and prioritised for action through the tasking process. There were no instances of intelligence being delayed or a backlog of incoming intelligence waiting to be processed.

The force regularly gathers intelligence on corruption and grades it in compliance with the relevant APP guidance. Assessments have been completed for anti- corruption issues including sexual offenders and the use of steroids. There is some proactive intelligence gathering by cross checking of IT systems, use of phones and computers.

Recommendation

Within six months, the force should ensure that it has the proactive capability to effectively gather, respond and act on information which identifies patterns of unprofessional behaviour and corruption.

Where there is actionable intelligence it is acted upon and monitored through a structured governance process in the ACU. A performance report is produced on a quarterly basis for the PSB board. This report includes the number of intelligence submissions received, the source type, roles of the subject, rank or grade of the subject, geographical area, including an update regarding the progress of each case. The ACU also provides a briefing to the DCC on a quarterly basis and there is a monthly covert and overt tasking process.

The force effectively identifies multiple suspects and multiple offences by a single suspect, and has processes are in place to ensure this takes place. Multiple offences and suspects are looked for during investigations using the force 'iBase' system to link cases and suspects.

Capability

The head of the ACU has direct access to the DCC as necessary and can consult the DCC for important or critical decisions. There are also formal quarterly meetings. The force has access to specialist staff when required either, within the force, for example technical and surveillance assets or specialist detectives from the murder investigation team. They also have good established relationships with other forces regionally and nationally from where additional resources are sometimes used. HMIC were informed there were sufficient finances available within the budget to pay for these additional assets.

The ACU has sufficient capability but limited capacity to provide a proactive element due to staffing levels. There are six staff members within the ACU including management. The performance of PSB and ACU is monitored by the DCC and the PCC including timeliness, quality of handling complaints, investigations, decision-making, outcomes and appeals, these are included in the quarterly PSB report which feeds into the annual strategic assessment.

Recommendations

- **Within six months, the force should ensure that it has a policy which informs staff of the gifts and hospitality that are appropriate to accept and why. The policy should include the requirement to register the value and description of all gifts and hospitality offered, including those declined. This should be communicated to all staff.**
- **Within six months, the force should ensure it carries out regular audits of integrity-related registers including gifts and hospitality, business interests, notifiable associations, expense claims, procurement activity and other records to identify potentially corrupt activity.**
- **Within six months, the force should publish a policy which clarifies the position on suspension, resignation and retirement of officers under disciplinary investigation.**
- **Within six months, the force should ensure it has a policy on substance misuse and drug testing to identify and deter substance misuse. The force should communicate this to all staff.**
- **Within six months, the force should ensure that it has the proactive capability to effectively gather, respond and act on information which identifies patterns of unprofessional behaviour and corruption.**