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# Police Integrity and Corruption

Lancashire Constabulary

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

The chief officer team consistently reinforces integrity issues and this is recognised by all members of the constabulary. Effective programmes of work, led personally by chief officers, promote continuing change. The force has established an integrity and standards board which is chaired by the head of the professional standards department and is actively generating a dialogue with staff to develop their understanding. Plans to roll out the national Code of Ethics are in place but have not yet been implemented.

### Summary

The chief officer team consistently reinforces integrity issues and this is recognised by all members of the constabulary. Effective programmes of work, led personally by chief officers, promote continuing change. The force has established an integrity and standards board (ISB) which is chaired by the head of PSD (professional standards department) and is actively generating a dialogue with staff to develop their understanding. Plans to roll out the national Code of Ethics are in place but have not yet been implemented.

There is a culture of professionalism within the constabulary and staff are prepared to challenge unprofessional behaviour and report wrongdoing. Effective methods for monitoring force information systems are in place and the professional standards department routinely carries out proactive checks.

HMIC found that the force needed to publish guidance on policy and the outcome of misconduct hearings to inform the workforce.

A process using information drawn from force systems is used to identify staff who may be susceptible to corruption and this is used to drive investigations. The constabulary is effective in developing intelligence about corruption but HMIC found that there was a need to extend testing and analysis by cross referencing databases and records, and the force should publish more information, including gifts and hospitality records.

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

The constabulary has made strong overall progress against the three areas for improvement identified in 2012.

The integrity review has been explained to staff and they are now well informed on the requirements and responsibilities regarding their use of social media.

Integrity training courses have not yet been provided for all staff but some related training takes place and there is a continuing and effective process to check understanding.

**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 and consistent communication from the chief constable and the chief officer team using a combination of 'road show' events and online discussions to engage members of the constabulary and raise awareness.

The deputy chief constable leads a 'cultural shift' programme and the force has established an integrity and standards board to guide policy.

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

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

HMIC found that there was a culture of professional challenge within the organisation.

Staff will readily report wrongdoing and are supported when they do so.

The force has increased analyst resources and operates a joint audit programme with the OPCC to identify issues or areas of concern.

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

The force carries out individual risk analysis to identify staff vulnerable to corruption and effectively directs investigations in response to intelligence received.

The resources allocated for corruption investigation have been increased this year and are sufficient, but development is required to ensure there is a consistent programme of proactive work which includes the cross referencing of databases and other records to identify potential areas of concern.

**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?**

HMIC found members of the force understood professional boundaries and managers and supervisors are active in reinforcing standards.

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

The constabulary is effective in developing intelligence and in its response where misconduct is identified or reported.

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

HMIC found PSD and counter corruption staff were trained and effectively organised in their work.

# The force/constabulary in numbers



## Complaints

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

**721**

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

**13.9**

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

**81**

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

**1.6**

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

**2.6**



## Business interests

Applications in 12 months to March 2014

**157**

Approvals in 12 months to March 2014

**152**



## Resources

Proportion of workforce in PSD/ACU

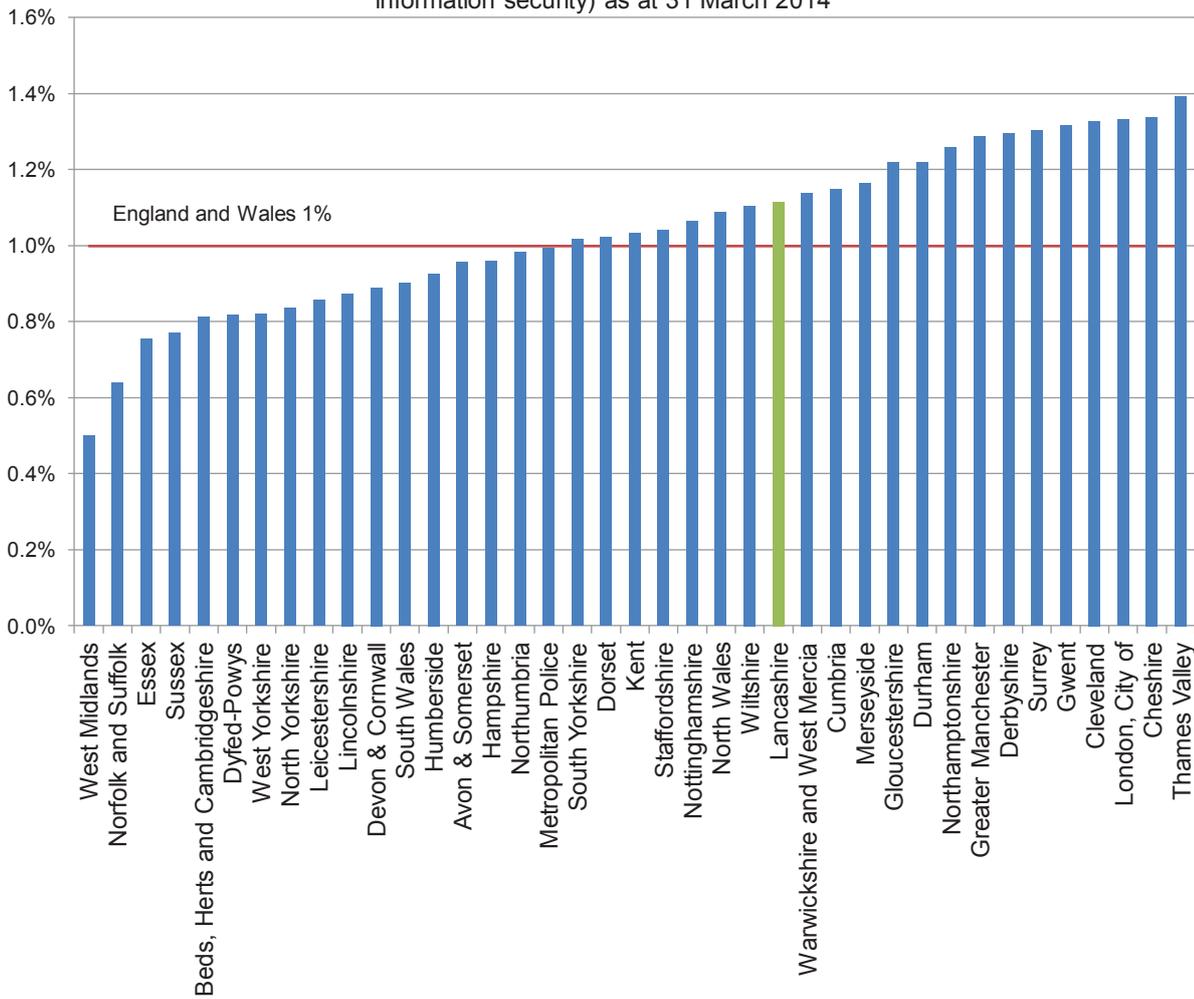
**1.1%**

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.

Proportion of total workforce in PSD/ACU (including civil/legal litigation, vetting and information security) as at 31 March 2014



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*<sup>1</sup> 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*<sup>2</sup> 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.<sup>3</sup> 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/](http://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](http://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?

During the inspection of Lancashire constabulary in 2012 HMIC found the following three areas requiring improvement:

- (1) To communicate the outcome of the integrity policy review
- (2) To improve guidance to staff on their use of social media
- (3) To introduce constabulary-wide integrity training and check understanding

HMIC found strong progress in communication by the constabulary on integrity issues. The chief officers have provided presentations to staff in a series of 'road show' events supported by local presentations by area commanders, and online discussion using the force intranet. HMIC found that members of the force recognised the force's focus on ethics and professional behaviour. The 'social media' policy includes eleven principles dealing with the use of social media for duty purposes. It also provides advice to staff on their personal use of these services.

It was evident during the inspection that most staff are aware of the constabulary guidance and understand the benefits, issues and consequences connected with use of social media. HMIC found strong progress in this area.

HMIC found limited progress in relation to training. Initial training for all staff joining the organisation includes modules covering standards of conduct and some in-service training is provided by the professional standards department (PSD) as part of other courses. Not all members of the constabulary receive dedicated integrity training but the 'transparency action plan' led by the deputy chief constable is progressively developing understanding of integrity and the Code of Ethics, and includes plans to develop training.

# 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

HMIC found clear leadership by the chief constable and chief officers in setting and reinforcing values for the organisation. The chief constable has routinely conducted 'road shows' engaging with staff to underline the values of the organisation. Since April 2014 these events have also focused on the process of re-structuring the constabulary and the process of change. The deputy chief constable leads a comprehensive programme aimed at cultural change and supporting the constabulary's focus on ethical and professional conduct. This programme includes the constabulary 'transparency action plan' addressing change under the headings: people, well-being and engagement, strategy, Code of Ethics, audit, performance and culture.

As part of the cultural change programme the learning and development department have set aside funds to commission a series of short films depicting 'moral dilemma' scenarios that will be shared with staff and used to check and further develop understanding. Though not yet implemented, this is an established initiative that will contribute to the roll-out of the national Code of Ethics.

The cultural shift programme has effectively used the 'buzz' network (a discussion board on the constabulary intranet) to generate discussion amongst staff across the constabulary and with chief officers around ethics and values. For example there were comments on 'buzz' about the type and cost of vehicles being provided by the PCC for chief officers' use. As a result all vehicles allocated to chief officers were changed to reflect the more modest budgets available to the constabulary. HMIC found that the use of this system by the constabulary had successfully engaged staff in an effective dialogue and had prompted challenges which have led to change.

As part of the structural change which reduced the force to three divisions, the constabulary has nominated three operational chief inspectors as 'integrity champions' to provide points of contact for corporate communication and with PSD for local management action.

The constabulary also generates discussion of ethics and moral choices in other ways. The constabulary 'beyond expectations' programme includes ten standards of behaviour for all staff, including 'challenging and reporting improper conduct', and emphasises the personal responsibility of each employee. This is reinforced in similar terms by the PSD's 'personal responsibility statement'.

HMIC consistently found that staff interviewed during the inspection expressed pride as members of the organisation and understood the potential effects of their behaviour on colleagues and members of the public.

Staff associations and representative groups interviewed said that unprofessional behaviour was not prevalent in the constabulary and while there were lapses by individuals affecting the workplace or colleagues, these are challenged, reported and dealt with.

In addition to the force roadshows led by the chief constable, divisional commanders operate similar focus groups for supervisors and staff. Topics concerning ethical choices are discussed and scenarios are used to develop understanding.

The appropriate use of computer systems for policing purposes is underlined by regular 'splash' screen messages on the constabulary intranet. These include reminders about use of social media and information security as well as access to constabulary information technology. Supervisors are clear that there has been a culture change regarding the use of constabulary systems and that there is an appreciation that any 'non-police' purpose is unacceptable.

The constabulary has plans, under the transparency action plan, to implement and explain the College of Policing 'Code of Ethics'. This presents an opportunity to give staff ready access to a more comprehensive single source reference to inform their personal responsibility for professional conduct.

HMIC found that there was a commitment amongst chief officers, senior managers and supervisors to challenge unprofessional behaviour. Staff reported that supervisors would appropriately challenge issues in the workplace, and senior officers gave examples of cases in which they had declined local authority invitations to civic functions, offered to them as representatives of the constabulary, where those functions included dinners or other free benefits.

HMIC found that supervisors were confident in their responsibilities and it was clear that they do challenge and deal with matters in the workplace. They were also clear that where the behaviour issue was more serious, PSD staff were available for credible advice and guidance on procedures. Staff group representatives also reported that unprofessional behaviour would be challenged by colleagues; and that supervisors supported staff when they reported wrongdoing.

## Understanding integrity

The constabulary has a range of different policies containing standards or guidance on individual conduct and various operating procedures. For example there are policies regulating media, social media, internet, electronic communications and removable media, in addition to substance misuse, business interest, gifts and gratuities and other similar guidance on conduct.

As set out above; the constabulary holds a quarterly ‘integrity and standards board’ (ISB), which has been established to set and maintain constabulary values. It brings together the relevant departments, divisional command and staff associations and includes a representative from the office of the police and crime commissioner (OPCC). Board meetings are provided with information on complaints, misconduct cases, vetting outcomes, reportable associations, gifts and hospitality, business interests and unsatisfactory performance policy (UPP) issues.

HMIC found that the ISB meeting is used strategically to identify trends and address needs through a continuing ‘integrity and standards action plan’ which identifies specific tasks and sets deadlines.

The constabulary has established a joint internal audit plan with the OPCC. This sets out a programme of audit and examination work. The aim of the plan is to provide an assessment of risks affecting constabulary and OPCC objectives, and assurances that planned actions are adequate and effective.

The proposed audit plan for 2014/15 includes audits of core financial systems, operational reviews and work supporting the national fraud initiative as well as other areas. The operational reviews will encompass covert operations, force equipment assets, gifts and hospitality and declaration of interests as well as complaints procedures. The process will also involve a review of recommendations arising from 2011/12 audit work.

Staff and some senior managers interviewed reported that although the outcomes of misconduct proceedings are published, the constabulary’s policy of not providing any information on the circumstances of the cases generates speculation. This reduces opportunities for staff to consider the context and outcome of behaviour that may have led to proceedings. While there are perfectly proper concerns around some aspects of disclosure, particularly where other proceedings may be involved, there are also benefits for the organisation and the public if more information about recent misconduct cases is available.

## Recommendation

**With immediate effect, the force should publish to all staff the outcomes of misconduct hearings. This should include sufficient circumstances of the conduct to allow staff to understand the boundaries of unprofessional behaviour and the sanctions it is likely to attract.**

Currently the constabulary does not undertake public or staff surveys to establish views on integrity matters and trust. Plans are being developed to use targeted surveys via internet and social media sites and it is expected that these will be in place later this year.

Meanwhile, the force has used other forums to expose issues of concern among staff. In addition to the 'road show' events headed by chief officers, meetings are run where members of staff have opportunities to exchange views and raise issues.

A divisional commander gave an example of forums known as 'buzz live' that he had conducted with groups of staff and separately with supervisors. It explored concerns and developed issues using the 'buzz' system to pose questions and then provided responses in person to a group of staff rather than online.

The constabulary use 'asset surveys' as part of a process to check well-being issues and to support a commitment to provide staff with effective and sufficient equipment and facilities.

The constabulary has an electronic system for reporting gifts and hospitality offers. This system is accessible via the constabulary intranet and automatically routes notifications for approval while updating the constabulary central database which is managed by the anti-corruption unit within PSD.

PSD is responsible for the 'gifts, gratuities and hospitality' policy. The policy was reviewed in 2012 and was scheduled for updating in July 2014. The document sets out principles and includes guidance for staff to consider whether an offer is 'genuine, independent, free and transparent'. It is accompanied by information about reporting procedures and explanatory information for officers.

All reports on offers of gifts or hospitality received are routed via heads of department or divisional commanders for approval and then recorded centrally as set out above. The anti-corruption unit audits the register, looking at groups, for example a particular unit of officers or those working at the same station, department and division; and identifies issues or any individual outliers. These matters are routinely discussed by the anti-corruption unit with command teams.

For the period 2012/2013 the constabulary recorded a total of 147 offers of gifts and hospitality, of which 121 were accepted and 26 rejected.

Over the same period there were 2 offers of gifts in the range '£500–1,000' and 2 in the range '£100–500' and these were accepted. There were 9 in the range '£50–100' of which 5 were accepted. The remaining 134 were in the range 'nil value – £50' and of these, 112 were accepted.

Gifts and hospitality offers are published on the constabulary website although it is difficult to find this information. HMIC noted that the details available are limited to the numbers of offers and acceptances; there is no information describing the nature of gifts, value or circumstances of the offer, acceptance or refusal.

Although not published, a recent positive change in the recording database now captures information on whether a gift has been 're-gifted' by the recipient; for example passed on to support the work of a public charitable organisation.

HMIC found that these arrangements were well established and effectively managed but there was some scope for the constabulary to improve transparency by providing more information publicly about offers of gifts and hospitality.

The 'business interests (police officers) scheme' and the 'police staff secondary employment supplementary income policy' are managed by the human resources department. Both policies commenced in 2011 and are scheduled for review in November 2014.

Business interests are recorded and information is provided to the OPCC for scrutiny. For the period 2012/2013 the numbers of constabulary staff operating approved business interests were: 457 police officers, 108 police staff and 52 special constables.

The policies contain clear guidance for staff on what constitutes a business interest as defined under police regulations or which encompasses activities which generate income or benefit in kind as defined by HMRC.

Staff are required to complete an application which is submitted to the human resources department at headquarters. Thereafter HR enquiries, including absence and performance review (PDR) checks, are completed before the case is referred to the PSD 'risk management panel' for consideration. The director of human resources, who is an assistant chief officer, decides whether the application should be approved.

The policy also describes circumstances in which approval for business activities may be reviewed, for example where there is a change in regulations, but also 'any other reason necessitating a review'.

Where an application is declined local managers are advised. PSD will only investigate where there is information to indicate that an unauthorised business activity is being carried on. The constabulary does not audit the register of business interests and there is limited subsequent action to check applications against the activity reported. However, a recent increase in the number of auditors within the anti-corruption team has provided extra capacity to extend the scope of auditing and there is a clear programme of work in place to take this forward.

HMIC found that, while registers are maintained and information is provided to the OPCC, the publication of information about gifts and hospitality and business interests is limited. There are benefits in routinely providing the public with more information in these areas and this requires attention by the force.

## Misconduct and unprofessional behaviour

During the inspection, different policy documents were produced for HMIC's attention, setting out conduct and behaviour requirements for staff. HMIC found that not all these documents had been reviewed within the time limits set by the constabulary.

The 'personal responsibility statement' is published by PSD and although this covers expectations of individual behaviour, there is no single identifiable guide that condenses all the principles and the practice expected from staff, to provide an accessible framework for reference.

HMIC found that although the 'removable media policy' includes restrictions on personal data storage devices being connected to constabulary systems, it was not clear that there was similar guidance on the use, by constabulary staff, of their personal data recording devices while at work; for example personal mobile telephones being used to capture images.

Where operational staff may not have ready access to devices authorised by the force, there are risks that their own equipment is being used to record events or images. This will produce intelligence that the constabulary cannot assess or unseen evidence, which, nevertheless would properly be subject to disclosure in subsequent criminal proceedings.

The constabulary's 'reportable association policy' provides definitions of reportable associations, identifies those which are inappropriate and sets out required reporting standards. HMIC found that staff understood these policies and in particular that any connection with persons having a criminal background should be reported.

There is a clear process for oversight of reports on associations which are routed via an inspector who is required to undertake enquiries, and the relevant head of department, before the 'constabulary risk management panel' considers whether to approve. The outcome is recorded on the constabulary register. HMIC found that this was an effective process.

The policy sets out that any non-compliance will be referred to PSD for investigation as misconduct. The PSD inspector provides regular input and briefing sessions to staff in divisions.

The constabulary has delivered National Decision Model (NDM) training to its staff and the model is understood and used widely by the constabulary. Supervisors confirmed that it is used particularly for pre-planned operations but also during incidents where an urgent response may be required; it is seen to be a good 'tool' for checking decisions. However HMIC found limited evidence that the model was being applied to ethical issues.

The constabulary vetting policy came into force in 2011 and vetting is applied to all 'designated posts'. This is now being re-visited to cover posts that have changed following the constabulary restructuring in April 2014. Staff working in the procurement department are all vetted and higher level 'management vetting' is now being rolled out.

Candidates for significant posts or internal transfers, for example to specialist posts, are referred to PSD by the HR department as part of the application process to ensure there are no concerns about integrity.

During 2014 the constabulary changed its promotion selection process to focus on ethical leadership rather than performance as the most significant criteria. This has been interpreted across the constabulary as a clear example putting into practice chief officers' statements about values. During the inspection, staff, supervisors and managers said that it had been welcomed.

The constabulary has arrangements in place to underline and support fairness in the workplace. There is a rolling programme of short-term secondments for staff representing minority groups to work in PSD to provide context and insight for investigations.

Case 'severity assessments' are undertaken by the anti-corruption unit or within PSD. For consistency and to ensure fairness, the head of the PSD is the designated decision maker and acts as 'appropriate authority' in connection with police conduct regulations for the constabulary.

As regards consistency of treatment between police officers and police staff, during the inspection staff associations raised the issue of recent, outwardly similar cases involving officers and staff in which there had been different outcomes. Both involved the misuse of electronic systems. HMIC noted, however, that one case was more serious as it involved the re-circulation of inappropriate material. These concerns about the consistency and fairness of case disposal underline the importance of transparency and the need to provide staff with more background about misconduct cases so that they are well informed and the lessons learned are clear.

The constabulary operates a confidential reporting telephone number known as 'right line' and a confidential email. Members of staff are able also to use the public 'Crimestoppers' website or contact number. Referrals through these systems are dealt with by the anti-corruption unit.

During the 12 month period April 2013 to March 2014 there was one telephone referral and this led to an anti-corruption team investigation. There were also 31 other confidential referrals, of which 15 subsequently led to misconduct investigations.

HMIC found evidence of a positive environment in which staff would report misconduct to the organisation. Most staff interviewed during the inspection reported that if they had an issue to report they felt confident they would be able to do so without repercussion. Most said they would be comfortable making a report to their line manager, although one example was provided where the individual had first approached a staff association to have the issue raised with PSD for investigation.

The chief inspector within the anti-corruption unit recently arranged a focus group with representatives of the constabulary's Black Police Association (BPA) to discuss the use of confidential reporting affecting staff from minority groups. This was perceived by those involved as a positive initiative reinforcing constabulary statements on values and the need to sustain confidence in these reporting mechanisms.

The 'buzz' discussion group referred to above has contributed to a climate in which staff are invited to raise issues about ethics. Staff seen during the inspection also reported the positive and effective response by the deputy chief constable who convened a focus group of BPA members to jointly consider the handling of an online discussion about recruitment processes.

HMIC found staff confident that the constabulary would respond to reported misconduct. A recent case involving the corrupt disposal of police assets was quoted as demonstrating an effective investigative response to reported misconduct. Although it took a year to investigate fully and for proceedings to be concluded, the initial report was acted upon and the officers involved identified and dealt with, in a timely way.

During the inspection, ten case files were examined. Correct referral actions were taken in nine cases. One case was not referred as it should have been to the IPCC (Independent Police Complaints Commission) on a strict application of the rules, although later investigation indicated it was less serious than originally suspected.

The head of PSD receives IPCC bulletins which the department considers and allocates to superintendents in divisions or departments for action. It was evidenced during the inspection that the constabulary considers the IPCC's 'lessons learned' issues, including discussion of them at the ISB.

HMIC found that resources within the corporate communications department had been reduced, and there is now less capacity to monitor the range of media sites that might contain references to the constabulary, or internal communication systems including the 'buzz' system. At the time of the inspection there were also several temporary vacancies within the department and the capacity had also been affected. In order to address these gaps the department is exploring the possibility of recruitment of volunteers including university students on work placement to support some of these processes.

## Professional standards resourcing and training

Operational staff have access to a regular training day and periodically this is used as an opportunity for PSD to provide extended briefing on integrity and misconduct issues. This training is delivered by the PSD inspector; format, content and delivery style comply with basic training methods checked by the learning and development department.

Records indicate that there have been 16 such sessions over the past twelve months each of which involved between 15-25 staff including response, neighbourhood officers, team leaders and newly arrived transferees from other forces. The sessions dealt with corruption threat and risk, constabulary policies, case studies and social networking awareness.

Staff confirm that this training is welcome and there is evidence that it has had an effect, as PSD has noted that increases in the numbers of confidential referrals correlate with its delivery of briefings.

However while the constabulary has raised discussion on ethics and has used the ‘buzz’ system to good effect, training is not available to all staff; some staff are concerned that the training they have received has not focused sufficiently on identifying corruption and is centred more on general misconduct.

HMIC therefore found that, although the training product occasionally being provided by PSD was useful, it was not clear that it was comprehensive or that it was reaching all the staff who might benefit. It is also uncertain that PSD would be able to sustain integrity training, particularly where increased proactive anti-corruption work may be required.

All investigators in the department are trained to level 2 of the ‘professionalising investigation programme’ (PIP); and the detective sergeant and inspector are more highly qualified. PSD staff have also attended training on social media, ‘open source information’ and auditing.

Managers and the constabulary HR department recognise the need to ensure succession planning for roles within the unit, though staff turnover within PSD is limited.

Despite an overall reduction in constabulary resources as the restructuring has been implemented, from April 2014 anti-corruption unit resources have been increased, with the addition of audit staff. This represents a positive investment in the unit and increases the constabulary’s capacity to scrutinise its systems and identify issues for investigation. All the staff in the unit have the necessary delegated powers.

At the time of inspection both PSD and the anti-corruption unit included key staff in temporary 'acting' roles. This is explained as being part of the overall constabulary restructuring programme which is a continuing process and will involve further budget reductions affecting role numbers. It is important, nevertheless, that the constabulary ensures continuity of leadership within PSD and especially within the anti-corruption unit.

The constabulary ensures that misconduct proceedings are conducted properly. In proceedings relating to a recent high profile case involving senior and long serving staff dealt with for corrupt disposal of constabulary assets, an independent external panel was convened to ensure transparency. In another recent case an assistant chief constable recently posted to the constabulary was selected as chair, to ensure independent oversight.

The constabulary is open to the use of fast track dismissal in appropriate cases. However over recent years concerns have been raised about the possibility that evidence used in misconduct hearings may not be able to be used in any criminal proceedings. Discussions with the Crown Prosecution Service (CPS) are in progress and the constabulary is actively examining effective and appropriate ways to avoid potential effects on subsequent court processes.

## Quality assurance

The OPCC has full access to the constabulary system, called 'flovate', which is used to record complaints received by the constabulary. This enables oversight of complaint investigations by the OPCC and where necessary a response to complainants who contact the PCC.

The OPCC is provided with a range of financial information by the constabulary including, for example, details of suppliers and items of expenditure over £500. The constabulary also provides details of reported business interests and gifts and hospitality received. The OPCC 'scrutiny committee' examines PSD information including the numbers of misconduct hearings, grievances, appeals and outcomes and the percentage of complaint recording decisions within target times.

HMIC found that the constabulary had reporting and oversight mechanisms in place that enabled current issues, risks and trends to be identified and acted upon. Corporate governance for integrity and standards is managed through the strategic people board chaired by the deputy chief constable. This receives reports from the integrity and standards board (ISB).

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The ISB receives reports from the 'joint risk management group' and the 'integrity standards champion' meetings. It is itself subject to independent scrutiny by the OPCC. In conjunction with the OPCC the constabulary intends to establish an independent ethics advisory committee to provide guidance on issues and dilemmas affecting the constabulary or its staff.

The constabulary 'transparency action plan' and the ISB action list include actions required across a range of issues identified for attention. These plans specify outcomes, identify action owners and include deadlines for completion. For example, the transparency action plan includes an item for the constabulary to put in place arrangements to update the College of Policing national register of officers who have been dismissed. This was scheduled for 1 April 2014 and is now in place.

Decisions in relation to hearings and investigations are routinely reviewed at the fortnightly PSD management meeting and the ISB. There are regular further examination of cases in progress with managers within divisions and departments.

The constabulary promotes consistency in misconduct cases by a monthly review of cases involving the head of PSD and the deputy chief constable as the responsible lead officer. These meetings include decision on suspensions and related matters.

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

## Investigating corruption

The constabulary has a series of policies and procedures in place aimed at preventing corruption in procurement and tendering. Where there is a tender for supplies or services exceeding £70,000, all staff or officers involved must submit a 'declaration of interest' before the procurement process can begin. The procurement department oversees compliance with the procedure, and there was evidence that it does so effectively. However, HMIC found that there was no regular process of investigation to validate the statements being signed off and the process is therefore reliant only on the declarations being made.

Procurement procedures are well established and all transactions are subject to financial audit. HMIC found there is scope to extend an appropriately targeted but pre-emptive process of similar checks across the range of smaller procurements to provide further transparency, and to reassure the constabulary that it has sufficiently tested the validity of these transactions to ensure that staff have followed procurement rules and that there is no corrupt practice.

Where tenders are being considered, supplier companies must submit directors' names and PSD conduct a range of checks. However HMIC found that these checks do not include a process of cross checking this information with the records of declared associations by members of the constabulary, or of exploring other intelligence links that may indicate a potentially corrupt association. It is clear that a more precautionary approach would offer greater protection against corrupt practice.

The anti-corruption unit uses risk assessment to identify potential areas for investigation and, either in response to intelligence or proactively, uses a specialist software system to audit access to constabulary IT systems.

In a recent incident following the arrest of a well-known individual by the constabulary, the unit examined the record of enquirers accessing the custody record. Several unexplained instances were discovered and were the subject of follow-up enquiry leading to misconduct proceedings. Meanwhile the anti-corruption unit has identified a need to develop more effective remote analysis of entries on the force custody system. A technical solution is being sought.

The constabulary has invested in staff to provide proactive oversight of its processes and systems. Since April 2014 anti-corruption unit staffing has been increased and the constabulary has increased staffing within the procurement department.

The anti-corruption unit has drawn up a programme for continuous audit of constabulary systems that will ensure uniform audit coverage and allow opportunities for other intelligence led work. The unit has appropriate links with current investigations into serious crime to develop intelligence and identify individuals and operations that require oversight.

The anti-corruption unit analyst uses National Crime Agency (NCA) counter-corruption methodology and routinely updates the constabulary assessment using a 'vulnerability matrix' recently developed by the constabulary which scores risk groups using a number of indicating factors.

This matrix is a useful tool which will assist the unit in tasking and co-ordination but at the time of the inspection it had not been deployed fully to promote proactive investigation. While the unit is responsive to intelligence received, there is scope to increase the proportion of work driven by risk assessment and speculative examination to identify issues that may not be indicated by specific intelligence. In particular there is a need to explore the potential connections revealed in comparisons of constabulary procurements, reported interests, associations, hospitality offers, telephone use and other constabulary records.

The anti-corruption unit collates a range of integrity and corruption risk factors to identify potential areas for investigation but HMIC found that this did not routinely include deliberate analysis or cross referencing of recorded information to identify potential links; for example by cross referencing entries in the gifts and hospitality register with other databases.

The constabulary uses the ISB effectively to identify trends in complaints or reported misconduct and to direct improvement actions by the organisation. However, it is not clear how the constabulary ensures that pro-active or speculative testing are consistently used to identify potential issues which then lead to investigation or follow up by the anti-corruption team and this needs attention.

Constabulary vetting arrangements comply with Association of Chief Police Officers (ACPO) national vetting policy for the police community. The constabulary has reviewed its application of management vetting to include a more appropriate range of posts.

The constabulary uses electronic monitoring to check access to social media sites being accessed through constabulary systems and the anti-corruption unit investigates the alerts generated. In response to intelligence or reports, it will proactively monitor media sources to identify misconduct.

Claims submitted by chief officers for various expenses are checked by their staff officers for accuracy before submission and there is oversight by the OPCC of financial audit processes. However the constabulary does not audit chief or senior officer diaries against other records including, for example, gifts and hospitality, associations or procurement projects. 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 constabulary.

The constabulary has used random and 'with cause' drugs testing. Over the last 18 months, three campaigns have been run, each one targeting a different operational area. In total 45 tests were conducted; none were found positive. The results were circulated to staff.

The constabulary uses intelligence sources and has mechanisms in place to task source handlers on specific issues to develop intelligence on corruption. At the time of the inspection there had been only limited use of covert integrity testing methods to identify corrupt officers and while these methods are sometimes difficult to deploy effectively there is some scope for more developed use where this is appropriate.

The anti-corruption unit attends the constabulary serious crime co-ordination meeting to ensure oversight of current targets and operations. Where significant operations are expected, and to ensure security; the anti-corruption unit will set up monitoring to identify systems access or other activity indicating inappropriate behaviour. PSD and the anti-corruption unit consider that their security is effective; these units occupy secure office space and have access to secure storage for documents. Electronic records for the anti-corruption unit are managed on a separate secure server and over a standalone secure network.

## Intelligence

The constabulary is compliant with the Authorised Professional Practice (APP) guidance, which it was involved in drafting.

Anti-corruption unit staff are experienced in their roles. They include an analyst and a systems manager who continuously monitor the results of audit and risk assessment processes to identify issues. Where necessary investigations will be undertaken or matters referred to the ISB for management action or process improvement.

The anti-corruption unit has recently developed a programme of work for a continuing process of audit, and the constabulary has a corporate 'integrity action plan' which identifies key deliverables under the headings: guardianship, engagement, communication and training, governance, transparency and threat assessment. This sets out a wide range of positive management improvement actions and tracks their implementation.

There is no overarching proactive plan that sets out how the unit will drive intelligence in risk areas and initiate investigations to identify corruption. However the recent increase in the number of researchers and analytical capacity offer prospects for this to improve in the short term.

The constabulary seeks actionable intelligence from a variety of sources including the NCA. Publicity is used to encourage other staff to come forward with information, and intelligence is appropriately assessed and graded within the unit using recognised methods and recorded on an 'iBase' system.

The anti-corruption unit conducts daily and weekly team briefings and there is a weekly management meeting to direct tasks. This includes oversight of current operations and developing issues.

The detective inspector and the unit detective chief inspector review ongoing cases and provide updates to the senior management team fortnightly. Actionable intelligence is dealt with and tasks are allocated at the anti-corruption unit daily and weekly briefings or during internal management meetings.

Where misconduct is identified, the anti-corruption unit will expand investigation to explore wider breaches of integrity. In a recent case a communications officer was identified for improper access of constabulary systems. The investigation indicated systematic abuse of constabulary records over a period of time, and also revealed failures in supervision.

HMIC found that although recent staff additions had improved audit capabilities, the anti-corruption unit remained a small unit with a limited capacity for large investigations or more extensive intelligence analysis.

## Capability

PSD and the anti-corruption unit have access to the full range of specialist support including surveillance, covert assets and technical support from within the constabulary.

At the time of the inspection resources were sufficient for the work in hand, but it was not clear how additional specialist and appropriately vetted staff might be available to support the unit if they were required to deliver wider proactive operations.

A formal review of PSD and anti-corruption unit work takes place every six months with the deputy chief constable. However the deputy chief constable and head of the PSD also discuss the work of the unit weekly. This oversight covers current cases, timeliness, threats and issues and the progress of tasks previously allocated.

To enable speedy decisions where required or to deal with confidential issues the head of the PSD has regular access to the deputy chief constable and the head of the anti-corruption unit would have direct access if requested.

# Recommendations

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- **With immediate effect, the force should publish to all staff the outcomes of misconduct hearings. This should include sufficient circumstances of the conduct to allow staff to understand the boundaries of unprofessional behaviour and the sanctions it is likely to attract.**