



Inspecting policing  
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# Police Integrity and Corruption

Northamptonshire Police

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

Northamptonshire Police has a well established professional standards department (PSD) including a small anti-corruption unit (ACU). The force has made good progress since the last HMIC inspection. The chief constable and all the chief officers show clear leadership on the importance of values, ethics and personal behaviour.

### Summary

Staff are aware of their responsibilities to challenge and report misconduct and unprofessional behaviour. There is a clear plan to ensure the Code of Ethics is fully understood and applied across the force and staff are aware of this. Training is delivered in a variety of ways including in person and using computer-based training. HMIC found good knowledge and understanding of policies, the supporting procedures and individual responsibilities. The police and crime commissioner is provided with sufficient information for independent oversight, and PSD performance is part of the force governance process. The force has a structured 'lessons learned' process that makes use of the Independent Police Complaints Commission (IPCC) 'Learning the Lessons' bulletin.

The force has a small anti-corruption team that conducts reactive research, analysis and investigation activity, but does not have sufficient capacity to complete proactive work to identify threat, harm or risk from corruption. HMIC found consistent assessment of the severity of the risks and rational decisions being made concerning intelligence development. However, there are some gaps in the accountability and auditing of decisions and there is a lack of management capacity at the rank of inspector. The force has tasking and co-ordination processes in place but there are some gaps that the force needs to fill. The force does not ensure that organised crime investigations are free from potential compromise and does not corruption-proof forthcoming operations to reduce the risk of compromise.

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

HMIC highlighted five areas for improvement in its 2012 inspection.

Governance arrangements for the professional standards department (PSD) have improved.

Relationships with the media have improved with a clear policy that is understood by staff.

Information disclosure issues have been addressed in a positive manner.

**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 with key messages being delivered by variety of means. All staff and supervisors said they would challenge poor behaviour and the force has a good confidential reporting mechanism.

Ethical and professional behaviour has been incorporated into relevant policies and procedures, but no ethical audits have been undertaken.

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

The PSD records are considered before promotion or transfer to higher-risk specialist posts.

Offers of gifts or hospitality are fully recorded and audited. There is a separate register for chief officers, and there is cross-checking with chief officers' diaries.

The force completes an annual staff survey that includes questions relating to standards of behaviour, and the force responds appropriately.

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

The small anti-corruption unit (ACU) completes reactive research, analysis and investigation activity, but it does not have sufficient capacity to undertake proactive work.

ACU detectives investigate complaints and conduct cases, which takes them away from their anti-corruption investigations.

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

Procurement processes and cross-checking with other registers, such as gifts and hospitality, have been improved.

There are clear policies for business interests, secondary employment and membership of other organisations that are understood by staff. Registers are maintained by the PSD on systems separate from the PSD management and intelligence systems.

**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?**

The force has good plans in place to ensure that the Code of Ethics is fully understood and applied.

There is one appropriate authority at chief officer level for both officers and staff.

Governance of the PSD is good but there is a need to record the regular meetings between the chief officer lead and the head of department.

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

Integrity-related registers are published on the force internet site and can be viewed by the public.

The PSD completes preventative anti-corruption activity including substance misuse testing and the checking of computer use by staff.

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

While there is consistent assessment of severity and decisions concerning intelligence development, there are some gaps in the accountability and auditing of decisions. This is due to a lack of management resource within the ACU.

The PSD has a tasking and co-ordination process with a governance structure, but there are some areas that need to be improved.

Cases are referred to the Independent Police Complaints Commission (IPCC) appropriately.

# The force/constabulary in numbers



## Complaints

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

**363**

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

**17.1**

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

**79**

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

**3.7**

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

**2.6**



## Business interests

Applications in 12 months  
to March 2014

**109**

Approvals in 12 months  
to March 2014

**109**



## Resources

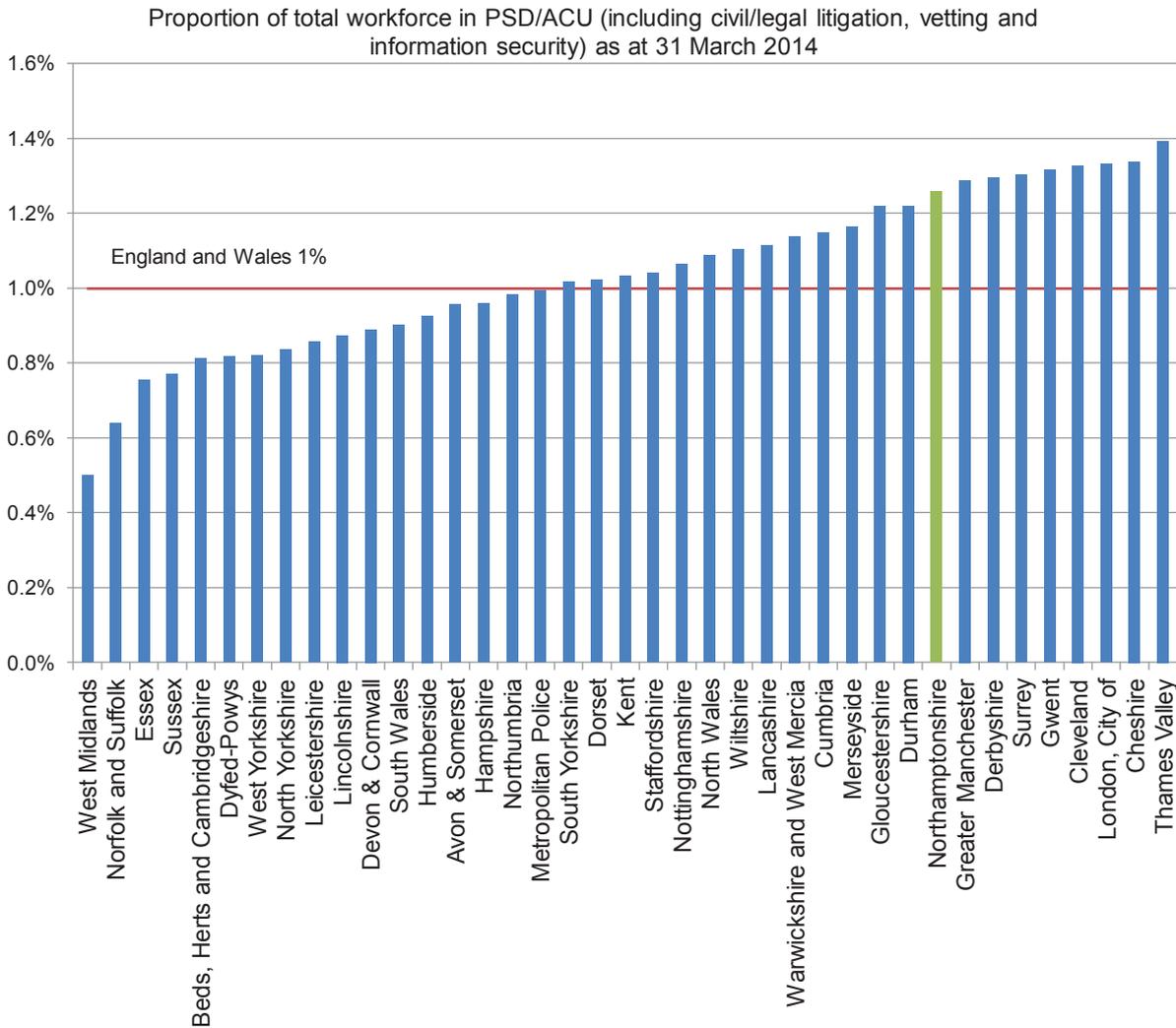
Proportion of workforce in  
PSD/ACU

**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*<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, London, December 2011. Available from [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, London, December 2012. Available from <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, Coventry, 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 highlighted five areas for improvement from the 2012 inspection report:

- Improvement in the force's governance arrangements for professional standards.
- Relationships with the media.
- Information disclosure.
- Procurement processes and cross-checking with other registers such as gifts and hospitality.
- Business interests, secondary employment and membership of other organisations.

There is a clear chief officer lead for the professional standards department (PSD) and HMIC found there is governance and oversight at force level led by the assistant chief constable (ACC). There is a regular meeting between the ACC and the head of department. However, this is not formally recorded. The force also holds separate governance meetings for information security and vetting, called the 'information assurance board', which is chaired by the deputy chief constable (DCC). There is a joint audit and performance board that includes professional standards oversight with both the chief constable and the police and crime commissioner (PCC) present.

The force has clear policies that are understood by staff and include a good process for recording chief officer contact with the media, that is made publicly available on the force website. As with many other forces, officers and staff are more inclined to refer media enquiries to the corporate communications department and wherever possible limit their personal contact.

HMIC found that the force has put great effort into education, prevention and enforcement, including the random audits of the use of the force intelligence system (FIS), the completion of a number of investigations and publicising the results of misconduct hearings. This combination of work shows a reduction in reported and discovered cases of unauthorised information disclosure.

The joint procurement unit is well established with a good understanding of the legal requirements for purchase and contracts. The IT system to track purchase orders and procurement to the point of payment is efficient and effective. HMIC found that registers such as gifts and hospitality, business interests and secondary employment have improved and can be searched to enable cross-referencing. However, cross-referencing of contract and procurement registers with the registers of gifts and hospitality, and secondary employment, does not happen routinely.

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There is a clear policy and procedure covering business interests that staff understand and is managed well by the PSD. As with gifts and hospitality, the register of applications for these interests is on a spreadsheet. For ease of searching and record keeping, the force should consider using Centurion, the PSD computer management system.

In summary, since 2012, Northamptonshire has made good progress.

# 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

Northamptonshire Police has made good progress embedding professional behaviour across the force. There is leadership from the chief constable, demonstrated, for example, by leadership events (attended by all staff), senior management forum presentations, intranet articles and blogs.

The chief constable led the Association of Chief Police Officers (ACPO) ethics portfolio from 2008 until March 2013. During this time, he led the development of the National Decision Model (NDM) and the national statement of mission and values. More recently, he has been actively involved in the development and introduction of the Code of Ethics for the service.

Officers and staff have a good awareness of the boundaries of professional and unprofessional behaviour and understand how their behaviour affects both the public and their colleagues. During focus groups and interviews, officers and staff provided evidence of a good understanding and were very clear on what the chief constable and chief officers expect of them as individuals representing Northamptonshire Police. Officers and members of the public referred to the positive value of the body-worn video cameras. These are worn on officers' uniforms and record sound and video of incidents that can later be used in evidence. Northamptonshire is one of the leading forces in testing and introducing this equipment. It is perceived that its use improves both officer and public behaviour, and contributes to reducing or resolving complaints. HMIC found that officers and staff are very aware of how their personal behaviour and attitude affect others. They see this as positive and a clear strength for the force.

Northamptonshire Police has ethical and professional behaviour incorporated into many, but not all, relevant policies. The force has structured processes for policy development and decision making. All policies are dated and have a review date, with the policy owner being responsible for ensuring that they are up to date. As part of the inspection process, Northamptonshire Police sent HMIC policies that were clear and understandable with appropriate supporting procedures. During the inspection, HMIC found little use of ethical audits contributing to policy and procedure development, or the wider use of such audits to identify and improve ethical or professional behaviour.

There is evidence that most leaders, including first-line supervisors, lead by example and demonstrate their personal commitment to ethical behaviour. They promote and encourage this, and check the understanding of their staff as to what is expected of them in their professional and private life.

Chief officers' expectations and standards are well known by managers and supervisors, and subsequently understood by officers and staff. Staff provided good examples of personal commitment, including how supervisors and managers have set out their expectations to staff.

Unethical and unprofessional behaviour is generally appropriately challenged. Northamptonshire Police provided examples to HMIC of individuals challenging poor behaviour, including occasions when staff had raised concerns over the behaviour of their supervisor or manager. Staff associations are positive about the force and there is a general feeling among those we spoke to that the force has improved and that individuals will challenge instances of unethical and unprofessional behaviour, either openly by using the staff and support associations or via the confidential reporting mechanism. The force has a 'fairness at work' process and uses its 'learning lessons' procedure to share more widely the improvement from issues that have arisen. The force has a network of fairness and equality advisers who are trained to provide a point of contact and to support individuals who may challenge others' behaviour or standards.

The force has clear plans to communicate the new Code of Ethics effectively. HMIC found that officers and staff are aware of the Code and the force plan that is overseen by the assistant chief constable (ACC). There is good evidence of managers already using the Code to set standards and maintain professional behaviour. The force has ensured that the national policing vision and use of the NDM operate with the Code in a way that is simple to understand and practical to implement. A lead manager at chief inspector rank has been appointed who manages a plan with a set of objectives and has clear ownership of actions, timescales and accountability. This structure is supported by a working group that is representative of the force, and an ethics committee with agreed terms of reference. HMIC noted that the force has ensured that the Code is now included within recruitment and promotion criteria and policies, and is strongly endorsed by senior managers as well as reinforced with regular intranet items. The force is ahead of many others in how it has introduced the Code and is ensuring that it is embedded successfully.

Individuals are aware of their responsibility to challenge and report misconduct and unprofessional behaviour, and generally feel supported when they do so, irrespective of the person's rank, role or experience. However, audits of force responses are not undertaken by senior officers. Staff that HMIC spoke to said they felt confident to challenge, and examples were given including a case when a student officer and an experienced officer reported their sergeant for bullying behaviour, and the force responded positively and supported them. However, HMIC did not find evidence that senior officers undertake reviews of the force responses to challenges made, although there was evidence of individual investigations and gross misconduct hearings being subject to review in order to learn lessons.

There is a clear policy outlining the obligation to declare any change in circumstances in an officer's or member of staff's personal associations and relationships. Officers and staff are aware of this. The policy follows the College of Policing guidance and provides examples of when a notification should be completed; it also outlines managers' responsibilities. The detective sergeant in the anti-corruption unit (ACU) is the point of contact for all staff. Notifications are reviewed and acted on, with staff receiving a personal briefing from the ACU and an action plan being developed when appropriate. HMIC found that the policy and an individual's obligations had recently been re-published on the force intranet. The focus groups, staff associations and support groups understand the policy, and it gives the organisation the ability to identify and mitigate risks arising from potential corruption and compromise of integrity.

The NDM is in use at all levels in the force. Officers and staff are trained and understand its application. The force has ensured that it is part of the Code of Ethics implementation and has reaffirmed its use as a process to resolve ethical dilemmas; make decisions that have integrity as an important element; and guide individuals in the actions they should take. This is a strength for the force.

Training on ethical and professional behaviour is provided to all staff and knowledge is checked regularly. The force includes ethical and professional behaviour in all initial training for new officers and staff, and this is supported by staff from the professional standards department (PSD). It is also included in promotion courses and at leadership and senior manager events. For specialist areas such as firearms, public order and control room staff, the NDM training includes specific elements on ethical and professional behaviour. This is supported by messages from the chief constable and senior managers that focus groups described as 'making the 4am decision and saying to yourself, does it feel right?' Individuals stated that they felt they would be supported, provided they used their training and made decisions that were ethical. The force has made it compulsory for staff to complete the PSD e-learning (NCALT) package on integrity, which involves scenarios related to ethical dilemmas.

While HMIC found no clear evidence of unconscious bias being included in integrity training or messages, Northamptonshire Police does include it as part of the force diversity training. This is provided to all new officers and staff and has also been given to existing staff.

To maintain the knowledge of officers and staff, the force records training received and refreshes or promotes individual elements through the intranet and at leadership events. An example of this is the recent intranet article by the chief constable on blackmail and the abuse of authority.

Chief officer leadership on integrity issues (including misconduct and unprofessional behaviour) is visible and recognised by staff. Positive behaviour and a culture of challenging and reporting wrongdoing are encouraged. The ACC is the chief officer lead, and officers and staff know this. He also leads for the implementation of the Code of Ethics and has produced a video blog to introduce the Code. He has supported this with presentations and further intranet messaging. He is the appropriate authority for the force, which means he makes the final decision on how misconduct matters are handled for all police officers and police staff.

Chief officers provide sufficient information to the police and crime commissioner (PCC) to enable the PCC to understand any integrity issues (including misconduct and unprofessional behaviour). The office of the police and crime commissioner (OPCC) receives a high-level summary of cases and statistics, which is included in the police and PCC joint audit arrangements.

Integrity issues (including misconduct and unprofessional behaviour) are monitored by chief officers at governance meetings. However, this is not done in a way that allows those present to understand the issues and identify the need for action. The head of department has weekly, monthly and bi-monthly meetings within the PSD and ACU. She, in turn, reports at a regular two-hour monthly meeting with the ACC. This meeting deals with performance and also individual cases or investigations that are being developed or are ongoing. However, the meeting is not documented.

In addition, the head of department reports to the joint audit committee, and quarterly to an information security board chaired by the deputy chief constable (DCC), who also addresses issues relating to information security and vetting.

Policies and guidance clearly explain the meaning of misconduct and unprofessional behaviour and describe the acceptable boundaries, laying out what is expected of staff in their private and professional life. Policies are reviewed at least bi-annually, following the procedures contained in police conduct legislation for police officers, and in police staff terms and conditions of employment policy and procedures. The force has policies for gifts and hospitality, business interests, secondary employment and membership of organisations, notifiable associations and substance misuse. HMIC found them to be clear, up to date and with review dates. However, this inspection did not provide a comprehensive audit of the application of all the policies that the force has in place. Staff associations confirmed that they are consulted and there is good understanding by officers and staff of these policies. HMIC found good examples of the force's use of the intranet to publicise or remind individuals of certain policies and their personal responsibilities.

## Understanding integrity

Some work is carried out via surveys of officers and staff to understand how integrity issues (including misconduct and unprofessional behaviour) affect public trust. In early 2014, the force completed an anonymous staff survey called 'Speak now'. The survey included questions on management by example; discrimination and how it is dealt with; confidence in challenging discrimination or inappropriate behaviour; and confidence to use discretion and professional judgement. The force uses external findings from the national public survey of satisfaction, and from any external results from work completed by the corporate communications department within the OPCC. Although the OPCC now has control and direction of this department, the force can commission media work when required. All public consultation and survey work is the responsibility of the OPCC.

Details of all occasions when officers and staff are offered gifts or hospitality are recorded fully in a centrally held repository (including when the gift or hospitality has not been accepted). These details are audited regularly and inappropriate entries are challenged or investigated. Northamptonshire Police has an acceptance of gifts and hospitality policy and associated procedures that was introduced in 2012. The policy outlines the circumstances under which staff may and may not accept gifts and hospitality. In particular, any offers of alcohol or approaches where a contract is involved must be declined. The policy states that a gift or hospitality under £5, excluding alcohol, may be accepted without recording or reference to a manager or supervisor. Sums between £5 and £25 must be recorded in the force register maintained by the PSD. Any gift or hospitality over £25 must be approved by the individual's departmental head and recorded. The force website contains a register of gifts and hospitality offered, and whether they were declined or accepted by members of the force. There is a separately published list for all chief officers; approximately half of all entries show that the gift or hospitality was declined. HMIC found the policy to be clear and generally understood by staff spoken to during interviews and focus groups.

Details of all occasions when officers and staff have applied for authorisation for a business interest are recorded by Northamptonshire Police in a centrally held register, including those cases in which the application was not authorised. The force policy and supporting procedures are up to date and a redacted summary of the information is publicly available on the force website. As of July 2014, there were 386 individuals on the register, with the rental or leasing of property being the most common authorisation. The police staff supervisor in the PSD maintains the register, which is audited periodically, and the head of department completes an annual review. As part of the policy, if an individual is absent from work through sickness for more than 28 days, the authorisation is suspended and reviewed following a return to work. During the inspection, officers and staff spoken to understood their obligations under the policy and HMIC was provided with examples of accepted and declined applications.

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HMIC found that rejected business interest applications are followed up to ensure compliance, as are cases where intelligence justified additional research or investigation by the anti-corruption team. The inspection found examples of a registered interest that had been revoked, and one where a refused application had been followed up to ensure that the applicant was complying. The PSD also refers back to supervisors to ask them to be aware of declined applications and to ensure that business interests are not being carried out contrary to policy.

# 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 decision making during the assessment process for transfer to specialist roles and promotion for some, but not all, positions, including applications for courses such as the strategic command course and the 'fast-track' development scheme. HMIC found that the force has identified a gap when officers or staff transfer internally from one specialist role to another, and has put in place a system to deal with this. The force has introduced a process in which all transferees go through vetting and checks with their current force, and are then interviewed in person by the detective chief inspector from the professional standards department (PSD). In that interview the emphasis is on ethical and professional behaviour. HMIC found good examples where this had been completed and, while the potential transferee had passed the selection process, they had failed the ethical interview and were not offered the post.

The force ensures that all staff, irrespective of rank or role, are treated fairly and equally in terms of how investigations are assessed, recorded and investigated, and how sanctions are imposed. The inspection team was provided with good evidence that the force has taken care to improve consistency. The head of the PSD has a good working relationship with departmental managers and staff associations.

There are confidential mechanisms supported by a clear policy for staff to report wrongdoing by using the 'Bad apple' confidential reporting system. HMIC found this to be well publicised throughout the force with all staff spoken to having knowledge of it and of how to report matters. The system has been in use since 2012 and has been used more than 135 times. During reality and file testing, examples of investigations arising from information provided through the 'Bad apple' confidential reporting process were found. There was evidence of intelligence coming from confidential reporting that did not lead to an investigation, but had been researched to prove there was no misconduct. The force should ensure that proper audit and quality assurance processes are in place so that the right course of action is taken in such circumstances.

The force generally responds to reports of wrongdoing by staff in an effective and timely manner. This view is supported by staff and staff associations. The inspection found that the force's recent staff survey provided good evidence that generally officers and staff feel that they will be positively supported and are not fearful of adverse consequences. Supervisors also referred to the 'well-being panel', which consists of members of staff including staff and support associations providing advice to individuals, and managers going through or managing performance, absence and conduct issues. HMIC also found that staff and support associations expressed confidence in the organisation's response to, and support of, reports by individuals of wrongdoing.

Northamptonshire Police publishes data and information on its website on the gifts and hospitality register covering all officers and staff, and includes accepted and rejected offers, expenses, media contact, gifts and hospitality of chief officers. It also publishes information on the register of business interests and the outcomes of misconduct hearings. The force publishes a quarterly update of PSD investigations and results. This document contains good detail, and is found under the ‘transparency’ section of the force website along with the information concerning registers and expenses.

The force holds regular quarterly meetings with the commissioner from the Independent Police Complaints Commission (IPCC). The review of case papers by HMIC found evidence that IPCC referrals are generally properly considered as part of the initial and severity assessments.

The force actively uses the IPCC bulletin to disseminate learning and collate responses to issues. It has developed good processes, with officers and staff spoken to providing good evidence of learning from this information. There was a clear view at all levels that the PSD provides good support and guidance that are balanced, but will, when appropriate, use legislation and policy to hold individuals to account.

## Professional standards training and resourcing

Staff in the PSD and ACU receive regular training for their role including the national professional standards course, and they also attend ad hoc training when available and necessary for their role. Some, but not all, staff within the PSD and ACU were appointed with levels of expertise, competence and qualifications appropriate to their current role. The head of department can access specific training if and when required.

Succession planning takes place to ensure consistency in the PSD. Staff told HMIC that this has not been a consideration in the past; however, the current assistant chief constable (ACC) sees this as an area that needs to improve.

Misconduct hearings are constructed to ensure transparency, effectiveness, efficiency and legitimacy, including the use of an appropriately qualified presiding officer who is independent of the person investigated. The chairs are trained and the force uses individuals from outside the organisation to sit as panel members. Panel training has been given to staff, and the PSD business manager provides professional support during misconduct and gross misconduct investigations, and hearings or meetings. HMIC found that the force uses chief inspectors either to participate in police officer hearings or chair police staff hearings. All hearings are recorded with access to appropriate advice and guidance for the presiding officer, and, when required, legal representation to present appropriate cases.

The force makes use of fast-track dismissal and HMIC was provided with an example of this from the previous year.

## Quality assurance

The force regularly audits decisions in hearings or meetings resulting from allegations of misconduct or unprofessional behaviour against officers and staff. The audit is managed by the business manager who is responsible for the arrangements and management of hearings. HMIC was informed that at the end of every investigation the process is reviewed for lessons learned, with feedback received from panel members and counsel who represent the force at hearings. This information is then shared using the 'lessons learned' process. HMIC also completed an audit of a number of concluded cases and found consistent evidence of reviews of investigations.

The force endeavours to ensure the timeliness and quality of all investigations conducted in relation to officers and staff that are carried out by the PSD. The file review found evidence of time limits being met and the staff within the PSD being very conscious of needing to complete investigations to a good standard and in a timely manner. From interviews and focus groups, HMIC was satisfied that the force generally completes timely investigations. However, in order to achieve this, the department uses the ACU to complete investigations of complaints and misconduct. This has a negative impact on the ACU's capacity to complete proactive anti-corruption work.

Outcomes of misconduct hearings and meetings are published internally, with sufficient detail so that officers and staff feel that they understand and can assess why an individual appeared before a panel, and why the sanction was given. HMIC found good evidence of the ACC using a particular gross misconduct case to share learning across the force, and to reaffirm the chief officers' messages about unprofessional behaviour.

There is clear and consistent decision making on suspension, with the ACC as the appropriate authority and decision maker in all cases. HMIC found that there is a consistent approach, and, when appropriate, the force finds alternatives to suspension by using practical restrictions on an individual's duties.

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

## Investigating corruption

The force does not manage threat, risk and harm from corruption as part of a robust governance structure. The professional standards department (PSD) understands the need to adopt a national intelligence model (NIM) approach to the identification and management of risk from corruption, and understands the threats identified in the national corruption assessment. HMIC found that there is a tasking and co-ordination process, but there is no delivery plan or control strategy for the PSD as a whole, or specifically for corruption. This is due to a lack of capacity within the research and analytical section of the department.

The force does not identify posts vulnerable to the risk of corruption. Anti-corruption work is limited to the PSD's gathering of information concerning officers or staff who are highlighted as a result of the number of complaints received, or information on trends by location, type of complaint, role or team. The anti-corruption unit (ACU) analyst provides analytical support when the ACU or the PSD are conducting an investigation, but this is a reactive rather than proactive measure.

The force collaborates regionally in relation to providing staff to the East Midlands Special Operations Unit (EMSOU). There are protocols in place for reactive investigations, but no process for proactive work by the ACU in respect of Northamptonshire staff posted to the EMSOU. There is also an issue when staff from more than one force might be involved in the same disciplinary investigation and subject to differing force policies while being investigated, and so may be treated differently. HMIC considers that these identified issues be addressed regionally.

## Recommendation

**Within six months, the force should work with the EMSOU to ensure that there are proactive counter-corruption processes in respect of all staff posted to the EMSOU.**

Vetting arrangements comply with the national vetting policy and identify corruption risks at the recruitment stage for officers and staff. Vetting is again conducted on promotion to senior ranks and for posting to sensitive or vulnerable roles. The force has a vetting policy and the deputy chief constable (DCC) is the Association of Chief Police Officers (ACPO) national lead on vetting. The PSD has the responsibility for vetting and there is a knowledgeable and experienced manager in role. HMIC found that the force has made significant improvements over recent years including the introduction of better processes and allocation of resources to meet national standards.

The force monitors its own IT systems and takes proportionate action when appropriate, but it does not monitor public social networking sites. The ACU works with the information security manager who is part of the PSD management team and the information assurance team, also based within the PSD, to monitor systems. In February 2014, the force introduced a random checking regime of staff use of the force intelligence system (FIS). This is managed by the detective sergeant in the ACU, and HMIC found good evidence of this monitoring with 670 checks completed to date. Staff are aware that this is done. The ACU can monitor social media and has access to a computer to complete such open source checks. However, this is undertaken mainly when intelligence reveals there may be a problem, rather than the team proactively checking social media sites.

The corporate communications team is no longer under the control and direction of the force but part of the OPCC. There is a digital media producer in the OPCC who has responsibility for the proactive monitoring of social media and management of force sites to ensure accuracy, legality and good standards. If any issues are discovered, the OPCC informs the PSD for them to assess and carry out any investigations. The force has recently publicised the social media policy, and HMIC found that staff have knowledge of it and understand their responsibilities. The police and crime commissioner (PCC) is considering the purchase of bespoke software to monitor web content for inappropriate use of social media by staff. This could improve the efficiency and effectiveness of monitoring social media sites in the future.

The force carries out regular audits of chief officers' and senior staff's diaries against the gifts and hospitality register and expense claims. The force has a process in place whereby the assistant chief constable (ACC) completes a six-weekly audit. At the same time, his claims, gifts and hospitality are audited by one of the other chief officers.

The force uses random and 'with cause' drug testing, or intelligence-led integrity testing, to identify corruption. Results are circulated to the workforce. The force has a substance misuse testing policy with human resources (HR) responsible for the mandatory officer pre-employment and probationary period testing. The ACU leads on random and 'with cause' testing, and from 1 April 2013 to 31 March 2014 had completed 138 random tests and 3 'with cause' drugs tests. The force has in place a plan to complete a set number of random tests each month with a focus on officers and staff working in safety-critical roles. The results are published by the force as part of the ACU update that is sent to all officers and staff via the intranet. During focus groups and interviews with all staff associations, HMIC found a positive and supportive attitude to the force completing such testing.

The force does not ensure that organised crime investigations are not at risk of compromise from corruption effectively, and does not corruption-proof forthcoming operations to reduce the risk of compromise. There is a need for a clear operational security process, and cross-checking between the PSD and ACU at both force and regional level operations to identify and avoid threats from organised crime.

## Recommendation

**Within six months, the force should ensure that it has effective processes to minimise the risk of compromise to investigations into serious and organised crime.**

The force ensures the effective security of systems, exhibits and case papers with clear policies that are generally understood by staff. The information security manager is part of the PSD management team and has direct access to chief officers if required. Police buildings have secure swipe-card access, and there are different levels of access depending on what policing function is operating from the premises or part of the premises. Exhibits are recorded on a force system and secured locally in areas with additional levels of security for valuable items and controlled drugs. The force uses the government protective marking scheme (GPMS), and paperwork is stored locally and then transferred to an off-site secure storage facility if required. HMIC found no evidence that would give any cause for concern in this area.

## Intelligence

The force carries out only limited analysis to identify trends, because there is insufficient capacity within analytical teams available to the PSD and ACU to do this, owing to other operational demands. HMIC found examples of research and analysis being completed for performance information rather than intelligence purposes. The department does produce analytical work in response to an investigation – for example, on information misuse offences to identify the number of times an individual illegally uses police information. The ACU does not, however, have the capacity to complete any proactive analytical work, and this is an area for improvement.

## Recommendation

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

The force proactively gathers actionable intelligence on corruption, and grades it in compliance with the relevant authorised professional practice using the national intelligence grading system. The PSD and ACU do not have their own dedicated intelligence system but use the force-wide intelligence system with appropriate access levels.

The detective sergeant within the ACU manages the intelligence, but the inputting officer within the ACU takes responsibility for any initial intelligence development and scoping. The inspection found that ACU staff are trained in and have a good understanding of legislation on handling information. The reality checking found that intelligence is responded to in a timely manner.

HMIC found that the detective sergeant uses their professional judgement when deciding whether or not intelligence is actionable following any initial assessment and scoping work. However, there is a lack of accountability because there is no facility on the intelligence system to record the decision if no action is taken. This problem is compounded because the department does not have any detective inspectors to oversee the work and the decisions of the detective sergeant and ACU. While the detective sergeant is line managed by the detective chief inspector, the reality is that the sergeant effectively supervises their own work, which is not acceptable.

## Recommendation

**Within six months, the force should ensure that it has an effective process to monitor and audit the decision-making process and record keeping for intelligence relating to professional standards and misconduct.**

All ACU investigations are stored electronically on a dedicated ACU drive within the PSD with appropriate permissions and access controls by the team. Should intelligence be considered 'actionable' or 'potentially actionable', the owner of the case, usually a detective constable within the ACU, creates an investigation plan using an ACU dedicated template, and takes investigative action to seek to corroborate the intelligence and discover evidence-gathering opportunities. All these cases are supervised by the detective sergeant and based on a scored matrix. The open ACU investigations are listed in the ACU tasking and co-ordination document for consideration by the chair of the tactical tasking and co-ordinating group (TTCG).

There is a tasking and co-ordination process in place where corruption issues are considered and recorded. These are prioritised and allocated but not actioned or reviewed at subsequent meetings. A tasking meeting takes place every four weeks and is chaired by the head of the PSD. HMIC found that, when an officer in the ACU decides to take no further action on a case recorded in the tasking and co-ordination document, reference to the case is removed from the document by the detective sergeant, with the result that it is not considered at the next meeting. While the head of department has oversight of the decisions to progress or end ongoing intelligence investigations because she has to agree these, this practice reduces transparency and accountability.

There are sufficient resources to deal with the flow of intelligence that comes into the ACU, but its limited capacity means that the response to intelligence is restricted to reacting, rather than allowing scope for any proactive investigation.

## Investigations

The PSD and ACU generally have access to specialist resources when required at force and regional level. The force can also access specialist resources from neighbouring forces in the EMSOU and the National Crime Agency (NCA). The head of department has a good background in intelligence and investigation coupled with a good reputation that assists this.

The ACU has insufficient resources to provide an effective proactive and preventative capability. Since the 2012 inspection, the force has added an additional detective constable to the ACU, but there is still insufficient capacity to provide a truly proactive element. This is further compounded by the use of ACU staff to support overt investigations, including a death following serious injury and other cases managed or supervised by the Independent Police Complaints Commission (IPCC). The ACU is also part of the PSD on-call rota for general professional standards work, which again takes staff away from performing a more proactive anti-corruption role developing intelligence and doing increased prevention work.

The performance of the PSD and ACU is regularly monitored by the force and includes the timeliness and quality of handling complaints, investigations, decision making, outcomes and appeals. The monthly department TTCG meeting is documented and covers the timeliness of complaint investigations, re-investigations following appeals, all independent cases supervised or managed by the IPCC, gross misconduct investigations, suspensions of staff and any cases that could cause reputational damage to the force. HMIC reviewed the June 2014 meeting and found there was good management information, with named action owners or case investigation officers. These meetings included the quality of complaints handling and the quality of investigations, decision making and outcomes.

The head of the ACU for Northamptonshire Police is also the head of the PSD, and as such has a clear and direct reporting line to the ACC as the chief officer lead and appropriate authority for the force.

# Recommendations

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- **Within six months, the force should work with the EMSOU to ensure that there are proactive counter-corruption processes in respect of all staff posted to the EMSOU.**
- **Within six months, the force should ensure that it has effective processes to minimise the risk of compromise to investigations into serious and organised crime.**
- **Within six months, the force should ensure that it has the proactive capacity to effectively gather, respond to and act on information that identifies patterns of unprofessional behaviour and corruption.**
- **Within six months, the force should ensure that it has an effective process to monitor and audit the decision-making process and record keeping for intelligence relating to professional standards and misconduct.**