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# Police Integrity and Corruption

South Yorkshire Police

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

The chief officers have engaged in effective communication to reinforce and develop a culture within the force that increased the focus on integrity. Professional standards are understood by the workforce and there is willingness across the force to report wrongdoing. Although the force has effective systems and a range of policies in place to manage and regulate behaviour to safeguard integrity, some of these need refreshing. The professional standards and counter-corruption units are directed efficiently. Misconduct is effectively investigated and the force has identified innovative areas for analysis but some further audit work, including checking existing systems and records to identify potentially corrupt links, is necessary. Where unprofessional behaviour is found the force is robust but ensures investigations and misconduct proceedings are managed fairly.

### Summary

HMIC found clear leadership from both the chief constable and the deputy chief constable reinforcing a culture of ethical behaviour. The chief constable has emphasised important messages, including 'supporting reporting' (to encourage staff to report unethical behaviour), the 'chief's pledge' (to support staff who act in good faith), as well as a clear message that the force will maintain the highest ethical standards when dealing with legacy issues like the Hillsborough inquiry. The force has launched an integrity programme which incorporates the national Code of Ethics and the force FIRST principles (Fairness, Integrity, Respect, Standards, and Trust). HMIC found that officers and staff have a good awareness of professional boundaries.

HMIC found staff were aware of their responsibility to challenge and then report unprofessional behaviour and they feel supported when they do. HMIC also found that leaders, including first-line supervisors, lead by example and demonstrate their personal commitment to ethical behaviour. Training on ethical and professional behaviour is provided to staff and some knowledge checks are carried out.

The inspection found that some survey work is carried out to understand how integrity issues affect public trust.

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The force has implemented a central register to record offers of gifts and hospitality. The force publishes details of the gifts and hospitality register along with details of chief and senior officers' expenses but there is a need to develop more rigorous auditing of integrity registers. The force has improved the way it monitors business interests and notifiable associations.

The force has maintained an appropriate staffing level within the anti-corruption unit and has a positive programme of proactive work in place to identify misconduct, unprofessional behaviour and corruption.

The force has a number of ways to identify potential corruption risks. These include a strategic threat assessment which looks at known and potential threats. The force has recently carried out an operation to identify areas where vulnerable victims may potentially face exploitation. The force is working to identify vulnerability issues linked to elderly victims which may also be useful for other forces.

The force uses random and 'with cause' drug testing, and intelligence-led integrity testing to identify corruption and the results are circulated to the workforce. The frequency of this testing has, however, reduced recently.

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

The force has raised awareness of measures to improve staff awareness including a computer-based training package, a marketing campaign, setting up of district and department integrity boards and the appointment of local integrity champions

**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?**

Chief officers have emphasised integrity and used effective communication methods including roadshows, the ‘ask the chief’ intranet forum and local presentations to focus on ethical behaviour.

The force operates an integrity board, chaired by the deputy chief constable, which identifies and deals with emerging issues and promotes the ‘FIRST’ principles campaign.

The integrity board oversees a force integrity action plan which has clear objectives and effective monitoring to carry forward change.

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

The force uses an internal audit plan to direct monitoring work and allocate resources to examine integrity issues.

The chief constable has reinforced supporting reporting, pledging anonymity for all referrals.

Sixty staff are trained to support those who report wrongdoing.

Local and national trends are analysed and used to develop proactive operations but there is a need to develop more work to understand public and staff perceptions.

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

HMIC found effective assessment by the force of threats and risks connected with corruption. Those assessments are supported by the use of investigation and also an innovative analysis of areas in which elderly victims my potentially face exploitation. The force also records unmanageable debts incurred among force staff.

**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?**

Each district runs an integrity forum where local issues or trends are regularly examined.

Training is provided on the Code of Ethics under the 'street skills' programme and HMIC found staff understand the range of policies used by the force to safeguard integrity including use of social networking, contacts with the media and gifts and hospitality reporting.

The force has links with the 'inspiring youth' project in Rotherham which are used to identify perceptions about the use of police powers including ethical use of stop and search.

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

HMIC found the response to wrongdoing is timely and caseload and investigations are effectively managed.

Misconduct hearings include qualified legal advice and emphasise fair process under the 'FIRST' principles used by the force.

Where appropriate the force uses fast-track dismissal procedures.

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

The force identifies groups and individuals among staff who are susceptible to corruption and targets investigation where needed, although there is a need to extend monitoring of some force records.

Vetting arrangements are compliant with national standards.

The force carries out random drug testing and social networks are monitored by an external commercial agency.

## The force/constabulary in numbers



### Complaints

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

**440**

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

**8.7**

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

**94**

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

**1.9**

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

**2.6**



## Business interests

Applications in 12 months  
to March 2014

**454**

Approvals in 12 months  
to March 2014

**442**



## Resources

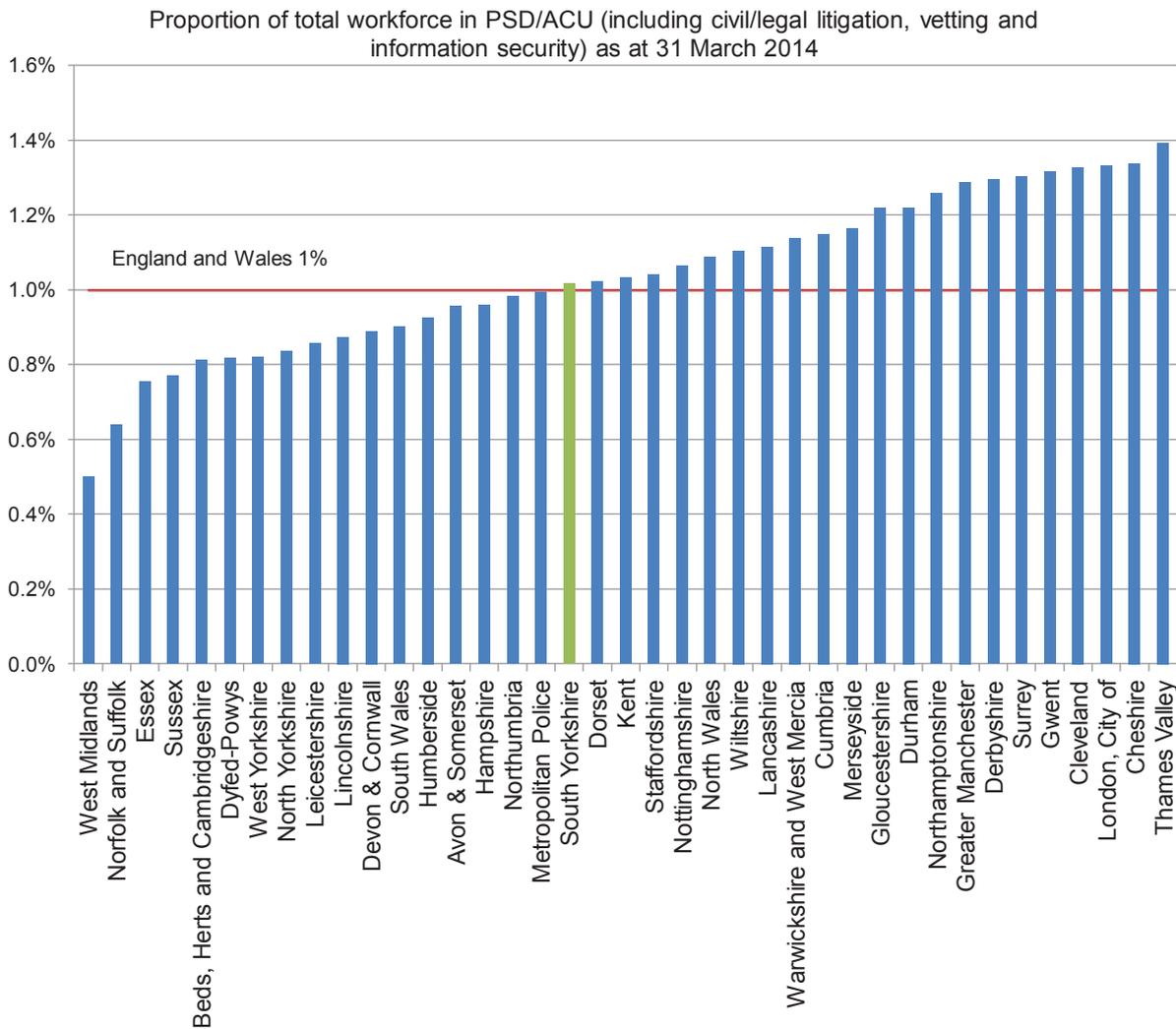
Proportion of workforce in  
PSD/ACU

**1.0%**

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, 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?

HMIC highlighted five areas for improvement from the 2012 Inspection report:

- To ensure staff know about the updated force policies on relationships with the media, acceptance of gifts and hospitality, social media use and secondary employment.
- To ensure all contacts with the media are recorded
- To publicise standards of behaviour, on and off duty, in relation to the use of social networking sites.
- To merge gifts and hospitality registers into a single electronic register.
- To put in place monitoring to cross-reference contract and procurement registers with the gifts and hospitality register.

The force has made good progress in promoting policies which safeguard integrity. The force has undertaken a number of measures to improve staff awareness, including a computer-based training package, a marketing campaign, the setting up of district and department integrity boards and the appointment of local integrity champions to provide two-way communication at a local level. A number of policies have now reached their two year review and will need to be reviewed or updated again.

HMIC found strong progress in relation to the recording of media contacts. The force has introduced a media contact sheet and database to help identify any potential information leaks. Regular briefings take place between media and the professional standards department (PSD). The corporate communications department also carries out monitoring of social media via a commercial service and the disclosable associations policy now includes media contacts.

The force has conducted an information campaign to make staff more aware of social media issues including circulating guidance, using local integrity champions to brief at a local level and setting up a board who oversee matters relating to digital media. Force and publicly-accessible social media accounts are monitored by a commercial service to identify any reference to South Yorkshire Police and these are then reviewed to see if any action is necessary. Good progress has been made in relation to this area.

The force has combined all gifts and hospitality registers into a single electronic database that is overseen by the PSD. Details of gifts and hospitality are published with entries for chief officers, senior officers and staff identified individually. It is also a standing item on governance and oversight visits by chief officers. HMIC found strong progress has been made in this area.

Good progress has also been made in relation to cross-referencing gifts and hospitality with other registers. Reviews are now conducted and the internal audit department inspect the register annually.

# 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

The chief constable and deputy chief constable have shown strong and clear leadership in introducing a culture of positive ethical behaviour and challenge of unacceptable behaviour at all levels across the force. The chief constable has conducted roadshows for staff across the force which cover ethical issues including supporting reporting (to encourage staff to report unethical behaviour), the 'chief's pledge' (to support staff who act in good faith), as well as 'ask the chief' via the intranet, where he responds directly to issues raised by staff. The chief constable has also set out a clear message that the force will maintain the highest ethical standards when dealing with legacy issues such as the Hillsborough inquiry. The force has also re-launched its FIRST campaign (Fairness, Integrity, Respect, Standards, and Trust) as part of its integrity programme, which is overseen by the integrity board chaired by the deputy chief constable.

The chief constable and deputy chief constable have an open dialogue with staff about historic issues currently reported in the media and are driving a culture of change. Members of the force are able to ask questions of the force executive via the 'ask the chief' forum on the intranet. Important messages are communicated via posters, hand-outs, 'splash screens' where messages appear on force computer systems, and items on force intranet briefings linked to the FIRST programme.

District commanders, who are chief superintendent rank, hold meetings with staff every three months where issues of conduct and professional standards are discussed. There are also senior management team briefings. HMIC found that staff thought leaders and members of the PSD were approachable to discuss specific cases or matters where they needed advice.

Members of the force are aware of the boundaries of professional behaviour and understand how it affects both the public and their colleagues; HMIC found that staff felt the chief constable demonstrated commitment to professional and ethical standards.

Ethical and professional behaviour has been incorporated into relevant policies and procedures. Management of professional conduct, discipline and complaints are dealt with in a force policy. The policy emphasises that any breaches should be identified and dealt with at the earliest possible opportunity. The force also has a policy regulating the use of warrant and identity cards and requires the self-reporting of both criminal and civil allegations and disclosable associations.

There is some evidence that ethical audits of policy are carried out as part of the general policy review and impact assessment process but it was also noted that several important policies have not been reviewed within the timescales set by the force and may require updating.

HMIC found evidence that most leaders, including first-line supervisors, lead by example and demonstrate their personal commitment to ethical behaviour and promote and encourage this with staff. Examples were given of leaders using local incidents to help illustrate learning and a district integrity champion running masterclasses to encourage staff to challenge and set standards. The force aims to involve supervisors in more monitoring of business interests and other private life issues that may affect staff carrying out their public duties. HMIC found examples where ethical interviews take place between supervisors and staff on topical issues such as use of social media and that street skills training days were seen as an effective method of communication. Staff spoken to during the inspection felt that most first and second-line supervisors did a good job and this was an improvement on their past experience.

The force has clear plans to effectively communicate and embed the new Code of Ethics as part of the force's re-launch of the FIRST campaign which forms part of the integrity programme.

Chief officers provide sufficient information to the police and crime commissioner to enable effective governance and accountability on integrity issue. The office of the police and crime commissioner (OPCC) is currently carrying out a selection procedure to appoint an independent ethics committee to advise both the police and crime commissioner (PCC) and South Yorkshire Police. The head of PSD attends the PCC governance and advisory board where integrity issues and PSD work are discussed. The head of PSD also has monthly meetings with the PCC to provide performance updates and confidential briefings.

Integrity issues, including misconduct and unprofessional behaviour, are monitored by chief officers at the integrity board which is the force level governance meeting. The board is chaired by the deputy chief constable, with action plans being identified and implemented via district and department command structures. In addition the deputy chief constable receives a weekly update on current investigations and cases in addition to other regular meetings with the head of PSD. The deputy chief constable also chairs the integrity champions' meeting which provides updates and views of the situation on the ground.

HMIC found that the force has a robust integrity action plan, with clear objectives, timescales, milestones and updates, where actions are tracked and those responsible held to account. A traffic light system is used to monitor progress and ensure actions are completed and thirty days of audit work are allocated solely to integrity matters in the force 2014/15 internal audit plan.

## Understanding integrity

The force integrity board uses the integrity cycle, designed by the organisation Transparency International, to chart and monitor the progress of the force integrity and values programme.

The OPCC has plans to set up an independent ethics panel to provide advice and guidance to the PCC and South Yorkshire Police with regard to ethical issues and dilemmas.

There is a clear policy outlining the obligation on all force staff to declare relevant changes in circumstances or personal associations; officers and staff members are aware of their obligations in this regard. Training on this issue has been delivered by the street skills programme supported by presentations by management teams to staff and to supervisors and staff associations by PSD staff. The professional standards department has also carried out a knowledge check by means of an internal telephone survey to supervisors and the results have been published internally.

Policies and guidance clearly explain the meaning of misconduct and unprofessional behaviour and describe the acceptable boundaries, and what is expected of staff in their private and professional life. Integrity champions have distributed integrity policy briefings to all staff covering gifts and hospitality, associations, secondary employment, information security, warrant and identification cards, self-reporting and other issues.

There was evidence that these processes have been effective in raising awareness across the force. For example, staff knew about the business interests policy and how it works.

If there are concerns about a business interest application, it is taken to a panel which is made up of the head of PSD, human resources and finance representatives. Refusal to grant a business interest will be followed by checks. Business interests that have been approved are also subject to review as part of the personal development review (PDR) process.

HMIC found that some survey work is carried out to understand how integrity issues including misconduct and unprofessional behaviour affect public trust, but that within the force, awareness of survey activity is limited. For example some senior managers believed that work is carried out but did not know what the results indicate. The force survey team is located within the business change directorate but the public engagement team is located within the media and communications department, which was restructured in April 2014.

There is recognition within both teams that opportunities to benefit from the survey areas covered are being missed. For example, the public engagement team conduct marketing activity to encourage completion of surveys but are not able to shape the survey questions

to be included. Survey work carried out includes 'your voice counts' (which is public facing) and a two yearly staff survey but there is scope for the force to develop this work.

The black police association (BPA) work with the 'inspiring youth project' based in the Rotherham district. This links in with youth groups and addresses issues such as stop and search. The aim is to break down barriers between the police and young people and may provide a useful opportunity to carry out surveys on integrity.

Details of all occasions where officers and staff are offered gifts or hospitality are recorded on a central system. This includes where the gift or hospitality was not accepted. Entries are audited regularly. Since the last inspection in 2012, the force has introduced a central register and carried out extensive communication with staff to ensure understanding of the process and the importance of transparency. Important messages delivered include that the expected position should be to politely decline a gift or offer of hospitality. Where this is not possible, authority should be obtained or a referral made to a senior officer for a decision on whether to accept. All acceptance and refusals should be recorded. The policy does exclude the need to record light refreshment offered by a member of the public such as a cup of tea and biscuit or inexpensive promotional products such as pens received at conferences. At a district and department level a reminder is sent out every month to ensure accurate recording. This includes emphasis on the importance of recording declined offers. A review is carried out by PSD centrally and at local business management meetings every two weeks. Inappropriate requests are refused and conditions imposed for some requests where approval is granted. District commanders also circulate these decisions with management teams to ensure a consistent approach is taken.

Details of all occasions where officers and staff have applied for authorisation for a business interest are recorded on a central register, including where the application was not authorised, which is administered within PSD.

HMIC found the force had approved 469 requests and refused 15 at the time of inspection. Each application for a business interest goes to an approval panel chaired by the head of PSD for a final decision to be made. All approved and refused business interests are circulated monthly to relevant first-line supervisors to allow for effective monitoring. Reviews are conducted after an initial three month period and thereafter on an annual basis as part of the performance development review (PDR) process.

The professional standards department conducts research of publicly available systems to identify any non-compliance with the business interest. Sickness absence or suspension also triggers a review of the appropriateness of any business interest.

A total of five days audit work to review business interests is included in the 2014/15 internal audit plan for the force.

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HMIC found analysis is carried out to identify trends in relation to integrity issues, including misconduct and unprofessional behaviour, and a problem-solving approach is taken in relation to any identified issues. South Yorkshire Police has a programme of proactive work which is developed following a strategic threat analysis. This includes a review of national trends, Independent Police Complaints Commission (IPCC) issues, cases experienced by other forces and cross-checking of force system use with potential misconduct areas. As a result of this approach the force has identified a number of cases which are currently under investigation. The force is also taking steps to ensure any new systems operated by the force facilitate PSD investigations.

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

## Misconduct and unprofessional behaviour

HMIC found evidence to suggest that unethical and unprofessional behaviour is appropriately challenged. An example was given by the force of unacceptable behaviour reported by members of staff that had led to an investigation resulting in the dismissal of a member of staff. Staff spoken to by HMIC also said they felt confident that they would challenge unethical and unprofessional behaviour.

HMIC found evidence that staff at all levels were prepared to report misconduct and unprofessional behaviour, either directly to supervisors and senior managers or via anonymous reporting methods. As part of the chief constable's supporting reporting theme, the force has trained sixty members of staff to provide welfare support for those who report wrongdoing as well as those subject to allegations. A record of each investigation is kept and is included as an agenda item on the PSD committee meeting. However, formal audits of the force response are not undertaken by senior officers.

HMIC noted examples which show that unprofessional behaviour issues are considered by the force in the decision-making processes for transfer to specialist roles and promotion for all positions. This includes applications for courses such as the strategic command course and the fast-track scheme. Re-vetting is also carried out in relation to specialist posts and senior promotions.

The force ensures that all staff, irrespective of rank or role, are treated fairly and equally in terms of how investigations are assessed, recorded, investigated and sanctions imposed by applying the FIRST principles and having the deputy chief constable as the single point for decision-making and continuity in serious cases. The force uses a barrister for advice and representation at all misconduct hearings though it is currently exploring the option to reduce costs by having this service provided by an appropriately qualified individual in Humberside Police as the forces share some services. Investigators also hold regular meetings to ensure consistency and two independent detective chief inspectors are used to make an initial assessment of the complaint and final decision on completion of the investigation. Support is in place for those who report wrongdoing as well as those who are subject to allegations and monthly meetings are held with staff associations where issues of fairness and equality are discussed.

South Yorkshire Police operate a series of confidential reporting mechanisms including telephone and anonymous email supported by a clear policy for staff to report wrongdoing. The chief constable has pledged that no attempt will be made to identify anyone anonymously reporting and since the re-launch in July 2013 the number of contacts has increased from three to 28 in a year. Links to confidential reporting mechanisms are on the front page of the force intranet.

HMIC found there is a climate in which staff felt confident to report misconduct and unprofessional behaviour by individuals or groups, and receive support in doing so without fear of adverse consequences. As well as the messages from the chief constable, South Yorkshire Police has a comprehensive guidance document entitled supporting reporting.

The force responds to reports of wrongdoing by staff in an effective and timely manner. There is a two-weekly update of investigations and workload which is chaired by the PSD detective chief inspector. Performance by the department is also checked at management meetings and at six-monthly meetings with the IPCC. In addition, there is a meeting of PSD champions every six months which includes discussion of all aspects of misconduct and unprofessional behaviour.

South Yorkshire Police publishes information on its public-facing website that follows the guidance of the model publication scheme in relation to: the gifts and hospitality register, covering all officers and staff and including accepted and rejected offers; the expenses of chief officers, senior officers, and police staff equivalent roles; the register of business interests; and the results of misconduct hearings.

## Professional standards resources and training

The National Decision Model (NDM) is in use at all levels in the force and officers and some police staff are trained and understand its application. Detailed presentations are given as part of personal safety and supervisor training. Training is given to police staff managers and call-handlers. The Code of Ethics' use of the NDM approach has been linked with first principles under the force FIRST Programme. Staff spoken to at all levels believed that the NDM was well understood by members of the force.

Training on ethical and professional behaviour is delivered to all staff at key points in service or as part of other training inputs, for example by senior officers during course opening comments and by PSD to recruiting, promotion and supervisor refresher courses or via roadshows. This training does not necessarily occur on a regular basis nor encompass all staff but some checking of knowledge is carried out. The professional standards department deliver the training as part of their role, but the learning and development department quality assure the training package. At the time of the inspection, 4209 of 4900 staff had completed a computer-based (NCALT) integrity training package. The force is currently linking the Code of Ethics to police conduct regulations training, which is delivered to special constables as well as officers. As part of the process the definition of corruption is explained and some scenarios, dilemma and unconscious bias training included. The learning and development department have also provided an input for the OPCC to understand how ethical issues are incorporated into training.

HMIC found PSD and anti-corruption unit (ACU) staff have appropriate training for their roles. The force has provided in-house training using experienced members of staff and all detective sergeant investigators are qualified under the professional investigation programme (PIP) level 2. Detective chief inspectors are PIP level 3 trained.

Succession planning takes place to ensure consistency within PSD and the ACU; the force has recognised that it will face a series of resilience issues in two years' time due to officers reaching retirement. The risk has been recorded and the force is currently developing plans to address this issue.

The force's PSD is sufficiently resourced and qualified to enable a proactive and preventive approach to its work. HMIC noted that the force has maintained the level of staffing in the ACU since 2011 and that the force has a positive programme of proactive work to identify misconduct, unprofessional behaviour and corruption.

However, while PSD and the ACU are able to cope with current workload, any increase generated by proactive investigations may affect timeliness, quality of investigations and the ability to continue proactive work and this may need to be monitored.

## Quality assurance

The force regularly audits decisions in hearings/meetings resulting from allegations of misconduct or unprofessional behaviour against officers and staff via the integrity board for lessons learned. The deputy chief constable also reviews investigations regularly with the head of PSD.

Regular audit takes place to ensure that investigations are justifiable and dealt with at the right level. Reviews conducted during investigations also result in escalation or de-escalation as appropriate. Meetings take place between the head of PSD and the deputy chief constable to review options, appropriateness of investigation, who should conduct them and what support is being provided to those involved.

The force ensures the timeliness and quality of all investigations conducted in relation to officers and staff by using performance indicators. In assessing timeliness, it is recognised that some investigations can be lengthy but the low rate of appeals against the final decision is interpreted as confirmation of an ethical approach. The force is moving towards common standards of investigation between those involving staff and those involving police officers with the head of conduct (from human resources) and detective chief inspector (PSD) having regular meetings.

The professional standards department oversee police officer and police staff investigations carried out by other departments and offer support as well as reporting progress to the deputy chief constable.

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There is a clear process to capture and record any learning, and disseminate it to the force effectively. The FIRST team publishes lessons learned on the intranet. When a complaint is resolved locally the subsequent report includes a section to indicate the lessons. Media and communications support the continuous improvement group to identify the lessons to be learned and communicate them to the force. There is a section on the intranet called 'clear ideas' where the force publishes ideas, academic research and lessons learned to improve the service. The professional standards department also debrief investigations and identify learning. In addition, integrity champions identify issues, review case studies or non-compliance with force policy and will intervene, advise or implement other measures as necessary.

The force approach balances resignation in appropriate circumstances against savings on public expenditure but there is a clear policy and consistent decision-making on suspension, resignation and retirement during investigations. The final decision is made by the deputy chief constable, in consultation with the chief constable if necessary, and the force reviews each case individually. The force will still pursue a criminal prosecution if justified even though a resignation has been accepted.

Misconduct hearings are constructed to comply with regulations to ensure transparency, effectiveness, efficiency and legitimacy. The force uses a barrister to advise the presiding officer and independent panels where appropriate. The force also applies its FIRST principals in this area as part of its commitment to integrity.

The force makes use of fast-track dismissal where appropriate and has done so once in the recent past.

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

## Investigating corruption

HMIC found the force effectively identifies and manages threat, risk, and harm from corruption as part of a governance structure. The force employs a range of systems to identify potential corruption risks including a strategic threat assessment, IPCC briefings, and experience from other forces to inform them of potential issues. The force has a control strategy which takes the national intelligence model (NIM) into account but focuses attention on two or three issues that they consider may be successful if targeted. The force has recently carried out an operation to identify the exploitation of vulnerable victims. This has led to individuals being identified. They now face criminal charges and misconduct proceedings.

The force is carrying out work to identify potential vulnerability issues linked to elderly victims. This is a significant piece of work that may be of interest to other forces.

Analyses are being developed to understand potential vulnerabilities from unmanageable debt and how to identify this at an early stage.

The force has a structured programme in place to proactively identify vulnerable individuals of groups within their staff but this is currently running behind schedule due to demands within PSD and the ACU to manage the current investigative workload. HMIC sees the proactive work undertaken by the force as very important in countering possible corruption and, as stated earlier in this report, recommends that the force keeps resourcing in this area under review to ensure that both reactive and proactive work can be processed in an efficient and timely manner.

Vetting arrangements comply with the national vetting policy and identify corruption risks at the recruitment stage for officers and staff. Vetting is revisited on promotion to senior ranks or posting to sensitive or vulnerable roles, and when staff apply for courses such as the strategic command course and the fast-track scheme.

The force monitors some force systems and takes proportionate action when appropriate. South Yorkshire Police collaborates with Humberside Police for the provision of IT services and these are managed by Humberside Police. South Yorkshire Police also recognises that one major in-force system has inadequate audit facilities though plans are progressing to replace this and audit functionality is being considered as part of the process. However, HMIC notes that systems monitoring is more extensive in Humberside. There are differences in the performance of the respective IT systems but the force may need to ensure best use is made of the expertise available as part of its collaboration with Humberside Police.

The force monitors social media using two commercial providers managed by the media and communications department. The professional standards department have access to these services when required and can conduct research where necessary.

The force carries out infrequent audits of chief and senior officer diaries against the gifts and hospitality register and expense claims. These audits are conducted by staff officers and by internal audit. While details of chief officer expenses, gifts and hospitality are published, the present audit process lacks independent oversight. The PCC has begun to establish an independent ethics panel to advise the PCC as well as the force and this may provide scope to develop a more transparent audit mechanism.

The force uses random and 'with cause' drug testing, and intelligence-led integrity testing to identify corruption, and results are circulated to the workforce.

The number of random drugs tests conducted by the force had reduced significantly from 132 in 2012 to 36 in 2013. No positive tests were recorded. The force should satisfy itself that random drug testing is being carried out at an appropriate level to provide both a deterrent and to highlight the seriousness with which the force views substance misuse.

The force ensures that organised crime investigations are not compromised and corruption-proofs forthcoming operations through links to the serious crime tasking process and the deployment of operational security measures where appropriate.

The force ensures the effective security of systems, exhibits and case papers by a variety of means. Investigations are managed on a system which is limited to ACU staff before being placed on the PSD Centurion system for longer term administration. Exhibits and case files are held in secure conditions with access limited to appropriate members of the ACU.

## Intelligence

The force proactively gathers actionable intelligence on corruption. The issue is discussed in the ACU at the two-weekly tasking meeting where management plans are put in place and updated with activity undertaken and any decisions made. As part of the process the force reviews best practice from other forces.

Actionable intelligence is followed up and monitored through structured ways of working. Intelligence gathered or received is analysed, graded and developed before being actioned.

There is a tasking and co-ordinating mechanism in place at which corruption issues are considered, recorded, actioned and reviewed.

The force effectively identifies multiple suspects and multiple offences by a single suspect; for example, in connection with an investigation concerning officers who exhibited predatory behaviour.

There are sufficient resources to deal with the flow of intelligence, however, the force needs to ensure that workload is kept under review to ensure that proactive work is not sacrificed to meet reactive demand.

## Capability

The professional standards department and the ACU have ready access to specialist assets when required with capability within both units or through regional support if required.

The ACU has sufficient capability and capacity to provide a proactive element most of the time but as stated earlier in this report, HMIC recommends that the force keeps resourcing in this area under review to ensure that both reactive and proactive work can be processed in an efficient and timely manner.

The performance of PSD and the ACU is regularly monitored by the force and includes the timeliness and quality of handling complaints, investigations, decision-making, end results and appeals. Actions are tracked and action owners held to account.

The head of anti-corruption has a clear and direct reporting line to the chief officer lead, the deputy chief constable, with meetings held monthly or more frequently if necessary.

The force ensures that lessons learned are disseminated to staff. However, HMIC found that staff felt that more comprehensive information about the cases being reported would improve the potential for learning.

During the inspection HMIC dip-sampled ten case files. HMIC found that nine cases were appropriately referred to the IPCC and although one case was not, it did not relate to corruption issues.