HMIC

Inspecting policing
in the **public interest**

Police Integrity and Corruption

Merseyside Police

Contents

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

There was clear evidence in Merseyside that senior officers of the force take the issues of police integrity and corruption very seriously. Senior officers of the force have been proactive in taking important messages to the workforce and in developing a climate in which professional behaviour is encouraged and valued. The anti-corruption unit (ACU) is well trained and resourced.

Summary

HMIC found that in Merseyside Police there is clear leadership from the chief constable. He has invested significant commitment in terms of time and effort to leading a series of road shows, and the effective 'Just Trilogy' ('Just Talk', 'Just Think', 'Just Lead') presentations.

HMIC found there to be effective and efficient governance structures, including an integrity and anti-corruption board. There is clear evidence of regular engagement between senior officers and the police and crime commissioner (PCC).

The professional standards department (PSD) works proactively to understand potential as well as actual threats and presents regular updates to the quarterly integrity and anti-corruption board meetings.

The force has well developed vetting processes in place, protecting both staff and the wider organisation. The force operates a confidential reporting system known as 'Safecall'. There is a general impression that staff fully understand the message from their senior officers, that they have a responsibility to report wrongdoing, and that they will be supported if they do so.

HMIC found in Merseyside a well-resourced, trained and equipped ACU.

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

The force did not have any identified areas for improvement in the 2012 report.

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

HMIC found that in Merseyside there is clear leadership from the chief constable, supported by his chief officers. He has committed significant time and effort to leading the series of road shows, and the effective 'Just Trilogy'.

Policies and practices have been reviewed to ensure that they reflect the need for professionalism and ethical behaviour at every level.

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

Work has been carried out to understand how integrity issues including misconduct and unprofessional behaviour affect public trust, via surveys of officers and staff, the general public, and youth groups. For example in `Have Your Say` members of the public have been able to email and articulate their policing issues.

There are well-developed vetting processes.

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

The force has a well resourced, trained and equipped anti-corruption unit (ACU) which is generally able to conduct a range of operational functions without recourse to other forces or national assets.

There is ongoing proactive work to identify officers and staff that could be at risk. Vetting is widely used within the force and there is routine monitoring of force systems as well as intelligence-led monitoring of social networking sites.

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?

Force leadership is supported by effective and efficient governance structures with inclusive staff engagement.

There is clear evidence of regular engagement between the police leadership and the police and crime commissioner (PCC) on matters of integrity.

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

The force operates a confidential reporting system known as 'Safecall'. Despite some concerns, many expressed confidence in it.

The force has an efficient and effective professional standards department (PSD).

There is effective monitoring of both the timing and quality of investigations. This includes those investigations which are conducted within the PSD and those which are delegated to local policing areas or to the HR department.

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

The ACU in its ongoing liaison work in relation to covert policing operations protects them from corruption.

There is adequate capacity and capability within the ACU to deal effectively with incoming intelligence and to deploy a range of technical covert assets within Merseyside.

The force/constabulary in numbers

Complaints

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

641

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

10.7

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

123

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

2.1

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

2.6

Business interests

Applications in 12 months
to March 2014

98

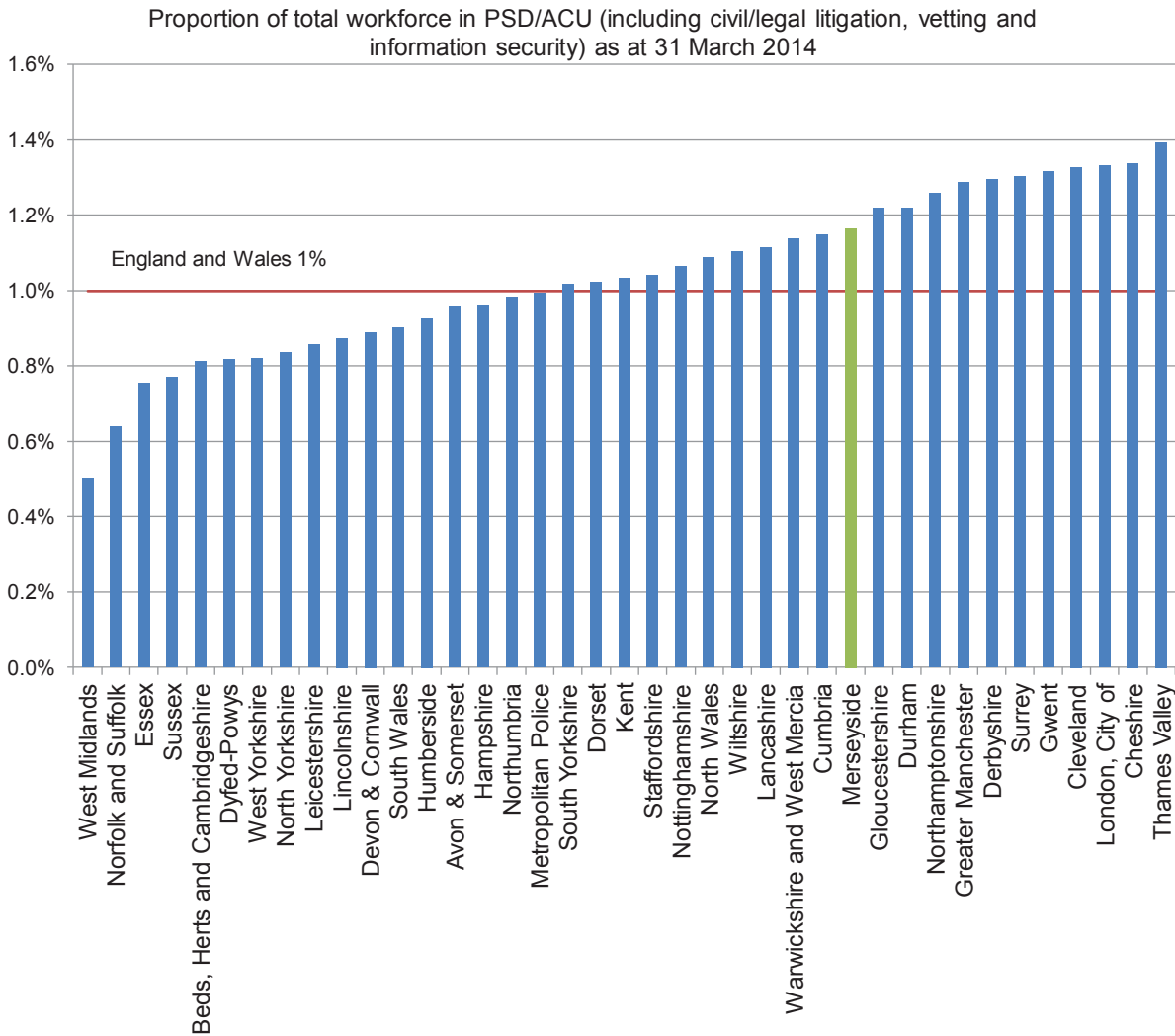Approvals in 12 months
to March 2014

97

Resources

Proportion of workforce in
PSD/ACU

1.2%

Proportion of workforce in
PSD/ACU
– England and Wales

1.0%

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

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

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

Introduction

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

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

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

(1) What progress has been made on managing professional and personal relationships since our revisit in 2012?

(2) What progress has the force made in communicating and embedding ethical and professional behaviour to all staff?

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

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

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

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

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

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

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

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

The force did not have any identified areas for improvement in the 2012 report.

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

Leadership and governance

HMIC found in Merseyside that there is clear leadership from the chief constable and a clear determination to create a climate of ethical behaviour and challenge. His personal leadership and presentation of the 'JUST Trilogy' – 'Just Talk', 'Just Think', and 'Just Lead' – demonstrated this. He used these sessions as a vehicle to describe his expectations in relation to standards, professionalism, engagement with the public, and personal leadership. This simple message has been consistently delivered over the last 2-3 years and is understood and accepted by staff who can relate to it. The chief constable has also asked the professional standards department (PSD) to deliver a presentation to senior officers. The presentation included covert video and audio recording of an anti-corruption Unit (ACU) investigation into an officer. Following the presentation, BCU (basic command unit) commanders were instructed to personally deliver the presentation within their areas to ensure the message is effectively communicated to the whole workforce.

The chief constable also uses the media to promote the force and its ethos effectively. For example, he took part in an interview with the Sunday Times and has frequently appeared on live interviews on Radio Merseyside in which members of the public were able to call in.

There are a number of novel means by which the senior officers engage with the workforce. These include the use of screen savers, Mersey Beat (the force quarterly magazine, which is available online and in hard copy), I-View (an internal video channel showing discussions from chief officers, 'hot topics', examples of good work, training, and personal expressions of thanks for work done on special operations). The communications department monitor how many officers view these and have noted a particularly good uptake when the chief constable has sent messages.

During interviews, one senior officer told HMIC "The chief constable could not be clearer in his expectation of his staff in relation to standards, professional behaviour and integrity." This view was echoed by many during reality tests. Another officer said "People shouldn't leave any of the road shows in any doubt of the chief's position, and that of the ACPO team." The lead shown by the chief constable and chief officers has been reinforced through emails and intranet blogs. The force celebrates, and widely circulates, examples of good practice.

Overall, HMIC found that officers and staff at every level spoken to are fully aware of the boundaries of professional behaviour and demonstrate a good understanding of how individual behaviour can positively or negatively affect both the public and their colleagues.

HMIC found that the values of ethical and professional behaviour are properly incorporated into the force's relevant policies and procedures. The force has, for example, woven the Code of Ethics into the 'JUST' trilogy, and staff understand the messages contained therein.

One of the elements of the 'JUST' trilogy is around leadership. All officers and staff spoken to by HMIC understood their personal responsibility to act in a professional and ethical manner at all times and to challenge others who they felt were not coming up to the mark. Throughout the visit to Merseyside, HMIC found good evidence to suggest that unethical and unprofessional behaviour was appropriately challenged. There is also good reason to believe that Merseyside Police support staff who report wrongdoing and that those who admit having made a mistake and reported this themselves would be treated supportively by the organisation.

HMIC found that Merseyside has a clear and well publicised policy outlining the obligation to declare any change in circumstances in an officer or staff member's personal associations and relationships, and that officers and staff members are aware of their obligations in this regard. Messages had been circulated on the force intranet, through internal briefings and through the force intranet newspaper 'In touch'. PSD follow up on such notifications and ensure they are reviewed and acted on appropriately. PSD briefings to staff have also carried messages on these aspects.

The National Decision Model (NDM) is in use at all levels in the force with officers in roles such as firearms, communications and public order regularly using and referring to it. Officers and staff in a variety of other situations are also utilising the model or the thinking behind it in their daily routines. One supervisor spoken to by HMIC was able to articulate how she had incorporated the NDM into conflict resolution training.

Notwithstanding the amount of work that has been undertaken, the HMIC found that some staff believe they had not received specific training on ethical and professional behaviour on a regular basis.

In Merseyside HMIC found robust governance arrangements for professional standards including weekly command team meetings which were properly minuted. There is a fortnightly meeting between the deputy chief constable and head of PSD. This fortnightly meeting might include discussions about restricted or suspended officers, and updates on current investigations, including ongoing covert and overt PSD or ACU investigations. The force's quarterly tactical tasking co-ordination group (TTCG) meeting includes a PSD specific section where areas of risk are discussed. This in turn feeds into a quarterly strategic governance meeting with the deputy chief constable. The head of PSD has monthly meetings with the police federation and other staff associations. In addition, the ACU holds a weekly intelligence meeting, attends TTCG meeting and updates the chief constable monthly. Representatives from the PSD attend the National Crime Agency (NCA) regional strategic threat board meeting.

The office of the police and crime commissioner (chief executive and complaints officer) meets on a monthly basis with the head of PSD and on a bi-weekly basis the police and crime commissioner meets with the chief constable. Integrity issues are monitored by chief officers at governance meetings in a way that allows them to fully understand the issues, and identify the need for action where required. These forums include an integrity and anti-corruption board, attended by police staff associations and UNISON, and regular meetings between the deputy chief constable and head of PSD.

During these meetings the head of PSD might typically present on the five most significant priorities or threats. There is also a bi-monthly force performance meeting, chaired by the deputy chief constable, in which complaints and misconduct are considered. These governance meetings are conducted in a way that effectively identifies the action that needs to be taken, along with clear objectives, timescales, milestones, action owners and updates.

Understanding integrity

HMIC found that the force has carried out work in order to understand how integrity issues including misconduct and unprofessional behaviour affect public trust. These include surveys of officers and staff, the general public, and youth groups. In 'Have Your Say' members of the public can email and articulate their policing issues and concerns to the force. This information is received and monitored by the communications department or control room after hours and sent on to the person in the force best placed to answer.

The force attempts to understand long-term threats. For example the force was well aware of the threat from organised crime in the area and had taken steps to protect officers and staff. This had included occasionally having to move staff from specific locations if their address had become known to criminals. An example of ongoing learning was that the force had identified that officers would be less liable to such threats if they notified the force of proposed new addresses in advance of any move. As a result, officers were being advised of potential threats beforehand and risks reduced.

HMIC found that the force has policy for receipt of gifts, gratuities and hospitality. The presumption is that officers should politely decline such offers. Each geographic policing area (BCU) and department has a local register to record gifts and hospitality, feeding into a central register. The central register is inspected and signed on a regular basis by the deputy chief constable, who challenges any entries thought to be inappropriate. Some variance was reported however, in that not all local policing areas were consistently recording declined offers in particular. The force should be able to satisfy itself that there is parity and consistency in the collection of this data and that all staff understand their responsibility to record gifts declined as well as those accepted.

Recommendation

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

Details of all occasions where officers and staff have applied for authorisation for a business interest are recorded fully on a centrally held register. This includes instances where authorisation is not given. The register of information is managed and monitored by the PSD who ensure that it is regularly reviewed. The policy applies equally to police staff and police officers. HMIC discovered some good practice in that Merseyside Police had offered an amnesty to staff to declare any potential business interests. This process had highlighted some gaps in knowledge among staff, some of whom owned rented accommodation, or, for example were engaged in the business of selling beauty products as agents.

HMIC found that the PSD has sufficient analytical capacity and capability to identify trends in relation to integrity issues, and has adopted a problem-solving approach to any identified issues. This process allows for prioritisation and the 'top five' threats were regularly reported upon by the PSD at the integrity and anti-corruption board.

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

Misconduct and unprofessional behaviour

HMIC found that the force has well developed vetting processes. Misconduct and unprofessional behaviour are issues which are considered as part of the decision-making process about promotions, and transfers to specialist roles. They are also considered as part of the process of applying for certain courses, such as the strategic command course, the pathway to chief officer status, and other accelerated promotion schemes.

The force has endeavoured to ensure that all staff, irrespective of rank or role, are treated fairly and equally in terms of how investigations are assessed, recorded, investigated and any sanctions imposed.

Those engaged in hearings and misconduct processes have received training; PSD maintains oversight of all misconduct investigations including those minor cases that are returned to local policing areas for finalisation. There is consistency in decision-making with the same assistant chief constable chairing the various discipline boards. Consistency in decision making is also maintained by the deputy chief constable acting as the Appropriate Authority for all decisions regarding whether police officers and police staff have a case to answer from gross misconduct and require a gross misconduct hearing. Policy has been standardised in relation to officers and staff who have previously been subject to disciplinary processes or suspension. Some expressed the view that police staff seemed at greater risk of dismissal than their police officer counterparts. The force leadership should satisfy itself that all possible steps are being taken to ensure parity between these two groups of staff.

HMIC found that the force uses fast track dismissal where appropriate and makes a point of publicising the fact that fast track dismissal has been utilised.

Merseyside uses a system known as 'Safecall', a 24 hrs confidential reporting process; both telephonic and computer based. The system is an independent service paid for by the force. The system provides intelligence reports to single points of contact within the ACU. This is supported by clear policy and promoted by both the PSD and the staff associations. In addition staff are encouraged to report matters to their line management as a first step, and there is a general view that the force would not only support those who do report, but would hold accountable a person who ought to report something but does not.

The senior leadership of the force has clearly articulated the expectation that staff should report misconduct, and staff interviewed in focus groups all understood this responsibility. There is a climate in Merseyside where staff feel confident to report misconduct and unprofessional behaviour by individuals or groups, and receive support in doing so without fear of adverse consequences. This confidence was overwhelmingly reflected to HMIC staff during focus groups and reality testing in the force, where staff explained that attitudes to reporting wrongdoing were changing and that the drive for professional and ethical policing was being widely felt.

HMIC was satisfied that the force responds to reports of wrongdoing by staff in an effective and timely manner. There is regular monitoring and oversight through the deputy chief constable, and an efficient tasking and co-ordination approach within PSD to keep investigations and processes on track.

HMIC found that although officers and staff may not have felt that they had received direct regular training on integrity issues, the drive and continuing feed of information by chief officers resulted in all staff who were spoken to during the inspection having an excellent understanding of their obligations to challenge and an awareness of, as well as willingness to use, mechanisms for reporting wrongdoing. Some staff, however, did report that due to the pressure of operational work they were not actually watching some of the video messages. Some staff said that they were clicking on the option `watch later' due to volume of work. Unfortunately staff also claimed there was a tendency for these videos not to reappear for viewing. HMIC suggests the force may wish to check IT systems to ensure this is not the case.

In interviews with senior officers and staff it was apparent that cases were being appropriately referred to the Independent Police Complaints Commission (IPCC). With regard to the circulation of IPCC bulletins, a somewhat mixed picture emerged. Some junior officers stated that they had never seen the bulletin. There were, however, examples of relevant information from the IPCC being passed to the training department. For example information on positional asphyxia had been included and had been delivered in bespoke training as a direct result.

Recommendation

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

Professional standards training and resourcing

With regard to training for staff in both PSD and the ACU, HMIC were informed that most staff joining the ACU tend to be from specialist backgrounds and are therefore already trained and experienced in the covert aspects of policing required for the role. All members of the ACU have attended counter-corruption courses at silver and bronze level. Succession planning takes place in the ACU and posts are sought after and usually dealt with by expressions of interest as they are deemed priority postings. However, PSD posts are said to be harder to fill. All applications are nevertheless strenuously scrutinised and vetted.

HMIC found that PSD is sufficiently resourced and staff are qualified to deliver a proactive and preventative capability in this area. There are a range of skills within the department, including accreditation to national standards known as professionalising investigation programme (PIP) level 2 and 3, along with surveillance capability, corruption specialists and family liaison officers. Additionally, in-house training is provided as required. PSD managers reported that they seldom need to seek assistance from the NCA for additional assets.

Quality assurance

PSD has a monitoring role in relation to all complaints and misconduct. It reviews cases, findings and sanctions to ensure a consistent approach. The bi-weekly meetings between PSD and the deputy chief constable are used to discuss investigations relating to suspended and restricted officers and other cases of note. Cases can be escalated or de-escalated if appropriate.

There is effective monitoring of both the timeliness and quality of investigations. This includes those investigations which are conducted within the PSD and those which are delegated to local policing areas or to the HR department. Staff associations did raise some concerns over the timeliness of investigations but also appreciated that circumstances were often beyond the direct control or influence of the PSD, who were often reliant on external bodies such as the IPCC or CPS (Crown Prosecution Service). In relation to timeliness, every 28 days an update was provided as to how the investigation was progressing.

PSD oversight and ownership has assisted in helping to maintain a corporate approach and has improved efficiency and effectiveness. There is a clear process, including monitoring and debriefing, which captures and records any learning points which may arise from an investigation, and to disseminate these to the force effectively. These learning points have also been put to good use in the 'chief constable road shows' and other presentations in which CCTV footage and other case studies have been used to press home the important messages to good effect.

There is a clear policy and consistent decision-making on the issues of suspension, resignation and retirement during investigations. Again, striving for a corporate and fair approach, the force has recently aligned police staff and police officer processes so that decisions on suspension are now consistently applied. At the time of the inspection the aligned process was about to go to the programme board for ratification.

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

Investigating corruption

The force regularly, proactively and effectively identifies and manages threats, risks, and potential harm from corruption as part of its governance structure. This takes into account national threat and risk assessments as well as regional and local issues. Organised crime has been identified as a major threat and risk in Merseyside and steps are being taken to counter this problem. The force governance, including strategic and tactical tasking and coordination arrangements, has ensured that monitoring procedures are in place where actions are tracked and action owners held to account.

The force's integrity and anti-corruption strategy was designed to identify high-level areas of risk. This high-level assessment allowed those in other areas or departments within the force to use the information to identify their own potential risk areas. For example, the procurement department demonstrated its awareness of a potential exposure to risk of corruption through 'friends, favours, etc'. Steps have been put in place to ensure that police personnel have no links with companies achieving or bidding for police contracts – for example in relation to business interests, gifts and hospitality.

The force has taken a range of steps designed to identify individual staff or groups potentially vulnerable to corruption. Measures mentioned above, for example, notification of house moves and business interests including letting of property, have been flagged as possible areas of vulnerability. The HR department works closely with PSD to safeguard staff, and the joint meetings, which included both departments as well as staff associations and UNISON, are also useful means of gaining a full view of real and potential threats to the force. In addition the force is proactively seeking ways of using a range of available data to develop a matrix, which highlights officers and staff who might be at risk.

HMIC found that vetting arrangements within Merseyside comply with the national vetting policy. They are designed to identify corruption risks at the recruitment stage for officers and staff, as well as those who were under consideration for promotion or posting to sensitive or vulnerable roles. The vetting department resides within the ACU and the force vetting officer reports to the deputy chief constable.

The force monitors both its own systems and social networking sites, including by performing dip sampling, taking action when appropriate. Individuals are not however monitored; nor is their social media usage, unless there is cause to do so. The HR department can also monitor the volume of use by staff of the internet. Access to social networking sites from force systems is tightly controlled.

Vetting processes have highlighted inappropriate usage of social media amongst potential recruits including regular officers, police community support officers (PCSOs) and special constables. Examples shared with HMIC included situations in which some individuals were found to have made inappropriate posts, comments or pictures on sites such as Facebook, and had not consequently been allowed to join the force; or in the most serious cases some staff had been dismissed. Force systems are also comprehensively monitored. The force is alive to a potential increase in unauthorised internet usage and has taken positive action to ensure that staff are warned against system abuse and about appropriate usage. Generally both officers and staff are increasingly aware of the perils of inappropriate use of force systems as well as of social media.

The force, through PSD, conducts regular random drugs and alcohol tests, prioritising specialist posts, for example firearms. HMIC found that the ACU also conducts 'with cause' drugs and alcohol testing, as well as intelligence-led integrity testing. As many as 20 'with cause' drugs and alcohol tests had been conducted in the last 2 years. The force does not publish any data in relation to random or with cause drugs, alcohol or integrity testing. HMIC is aware that the force does publicise findings of guilt.

HMIC found that Merseyside Police takes steps to ensure that organised crime investigations are not compromised and maintained a regular attendance at all force senior investigating officer (SIO) meetings where organised crime investigations were considered, helping to prevent corruption. They also had the opportunity to consider and advise about any potential areas of threat or risk, and had ready access to the chief constable who chairs these meetings and the deputy chief constable who also attends.

The force ensures the effective security of systems, exhibits and case papers through a number of means, including physical and IT based security measures. Force systems were monitored by 3ami MAS auditing software. The ACU's physical and IT system is isolated from other force premises which helps to maintain security, and its security compliance has been assessed by the NCA criteria as satisfactory. At operational levels, each BCU has its own temporary property store, with a centralised exhibits store available for long-term items. All case papers are secure and are held on the force's 'Niche' system.

Intelligence

HMIC found that the force complies with the authorised professional practice (APP) document for counter-corruption. In fact the head of the force's ACU had been involved in reviewing the APP prior to its circulation.

The force proactively and regularly gathers actionable intelligence on corruption and grades it in compliance with the relevant APP using the national intelligence grading system. The ACU has sufficient capacity and capability to conduct comprehensive, effective and timely analysis of existing and potential threats. Examples given to HMIC included the potential for force systems to be used for the illegitimate and predatory purpose of identifying vulnerable females. Other work cited was the use of IT systems to identify potentially corrupt or vulnerable staff from the variety of data available.

The well-structured force governance arrangements in place include the integrity and anti-corruption board, which has developed a delivery plan to identify and manage threats from corruption. The plan contains actions, action owners and accountability mechanisms. PSD has its own action plan coming from the board, with a number of strands of activity. HMIC were assured that all actions are tracked and followed up.

The force's PSD has a well-established national intelligence model (NIM) compliant, tasking and co-ordinating process in place at which corruption issues are considered, recorded, actioned and reviewed. All intelligence coming into the ACU is graded and developed before being passed to the operational team as a package for action. There are bi-weekly meetings between PSD and the ACU, chaired by the deputy chief constable, where all intelligence is considered and prioritised, and resources are allocated and tracked. These meetings are recorded by the ACU, which has developed a spreadsheet for recording actions and action owners.

HMIC found a number of examples where the force had effectively identified multiple suspects and also multiple offences by a single suspect. The level of capacity as well as capability in this area of business was readily apparent and the investment made by the force in order to guard against reputational risks likely to surface from corruption was a measure of the value the force leadership had placed in developing a police service in which the public can place faith.

The fact that the force had little or no need of support from outside agencies was further evidence of its capacity to deal effectively with the flow of intelligence. Senior managers from within the service expressed confidence to HMIC that there were adequate resources and sufficient resilience within the unit.

Capability

HMIC found that PSD and the ACU in Merseyside have ready access to specialist assets when required; these included both technical and conventional surveillance. Where necessary the force has utilised outside assets from other forces and also from the NCA. However, senior officers in Merseyside made it clear that the first port of call is always 'in-house' as there are generally sufficient resources to manage most circumstances.

Recommendations

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

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