



Inspecting policing
in the public interest

Police Integrity and Corruption

Northumbria Police

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Contents

To what extent has the force put in place arrangements to ensure its workforce acts with integrity?	4
The force in numbers	7
Introduction	10
What progress has the force made on managing professional and personal relationships with integrity and transparency since HMIC's December 2012 report?	11
What progress has the force made in communicating and embedding ethical and professional behaviour to all staff, including the new Code of Ethics?	12
How well does the force proactively look for, and effectively challenge and investigate misconduct and unprofessional behaviour?	16
How well does the force prevent, identify and investigate corruption?	20
Recommendations	24

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

HMIC found both strong and visible leadership in Northumbria from the chief constable and relevant chief officer team members. The deputy chief constable is actively engaged with the professional standards department. HMIC found Northumbria Police to be well set up to prevent, identify and investigate corruption. The force uses nationally recognised methods of strategic assessment, risk mitigation and monitoring for the Professional Standards Department (PSD) and counter-corruption unit. There is a positive and constructive relationship with the police and crime commissioner, who has introduced a small team of staff to act as first point of contact following receipt of a complaint.

Summary

HMIC found both strong and visible leadership in Northumbria from the chief constable and relevant chief officer team members. The deputy chief constable is actively engaged with the PSD. There is a positive and constructive relationship with the police and crime commissioner (PCC), who has introduced a small team of staff to act as first point of contact following receipt of a complaint.

There seems to be generally low reporting rates in relation to the gifts and hospitality register. While details of some incidences where gifts and hospitality were not accepted have been entered, not all staff fully understand the need to record incidents where gifts and hospitality have been declined.

HMIC found Northumbria Police to be well set up to prevent, identify and investigate corruption. The force uses nationally recognised methods of strategic assessment, risk mitigation and monitoring for the PSD and counter-corruption unit (CCU). It has dedicated analytical capability primarily tasked with intelligence analysis and research rather than routine performance measurement tasks. The force leadership has already identified a need for improved proactive protective monitoring for IT systems and steps are being taken to acquire appropriate system protection.

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

The two areas highlighted in the 2012 report included having checks in place to ensure that staff understand changes to policies and procedures, and that integrity training is undertaken.

Both areas have been addressed via the force 'integrity improvement plan'. Training has been provided to all police officers of inspector rank and above. It covers a range of integrity professionalism issues. Those trained then cascaded this to all staff in face-to-face discussion and as part of local initiatives focusing on integrity themes.

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 both strong and visible leadership in Northumbria from the chief constable and relevant chief officer team on integrity and corruption.

The police and crime commissioner (PCC) is working with the force to enhance public satisfaction in the complaints system.

There has been no staff opinion survey since 2010.

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

There is good consistency in the management of complaints and misconduct.

There are good measures in place to ensure consistency in the conduct and sanctions applied in disciplinary cases.

Staff throughout the force are aware of their obligations to challenge wrongdoing and inappropriate behaviour in the workplace.

There is some confusion among staff as to how best to report wrongdoing.

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

Management of the PSD and CCU is based on the national intelligence model (NIM).

The tasking and co-ordination processes outlined to HMIC enable effective prioritisation, allocation, tracking and accountability of tasks.

The force has dedicated analytical capability primarily tasked with intelligence analysis.

Steps are being taken to address an identified weakness in aspects of force IT security.

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?

While details of some incidences where gifts and hospitality were not accepted have been entered, not all staff fully understand the need to record incidents where gifts and hospitality have been declined.

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

The Independent Police Complaints Commission (IPCC) '*Learning the Lessons*' bulletin is being circulated on a selective basis.

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

The force is not making use of random drugs testing as a deterrent.

The force/constabulary in numbers



Complaints

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

755

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

14.0

Total public complaints against officers and staff,
per 100 workforce – **England and Wales**

15.7



Conduct

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

125

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

2.3

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

2.6



Business interests

Applications in 12 months
to March 2014

305

Approvals in 12 months
to March 2014

293



Resources

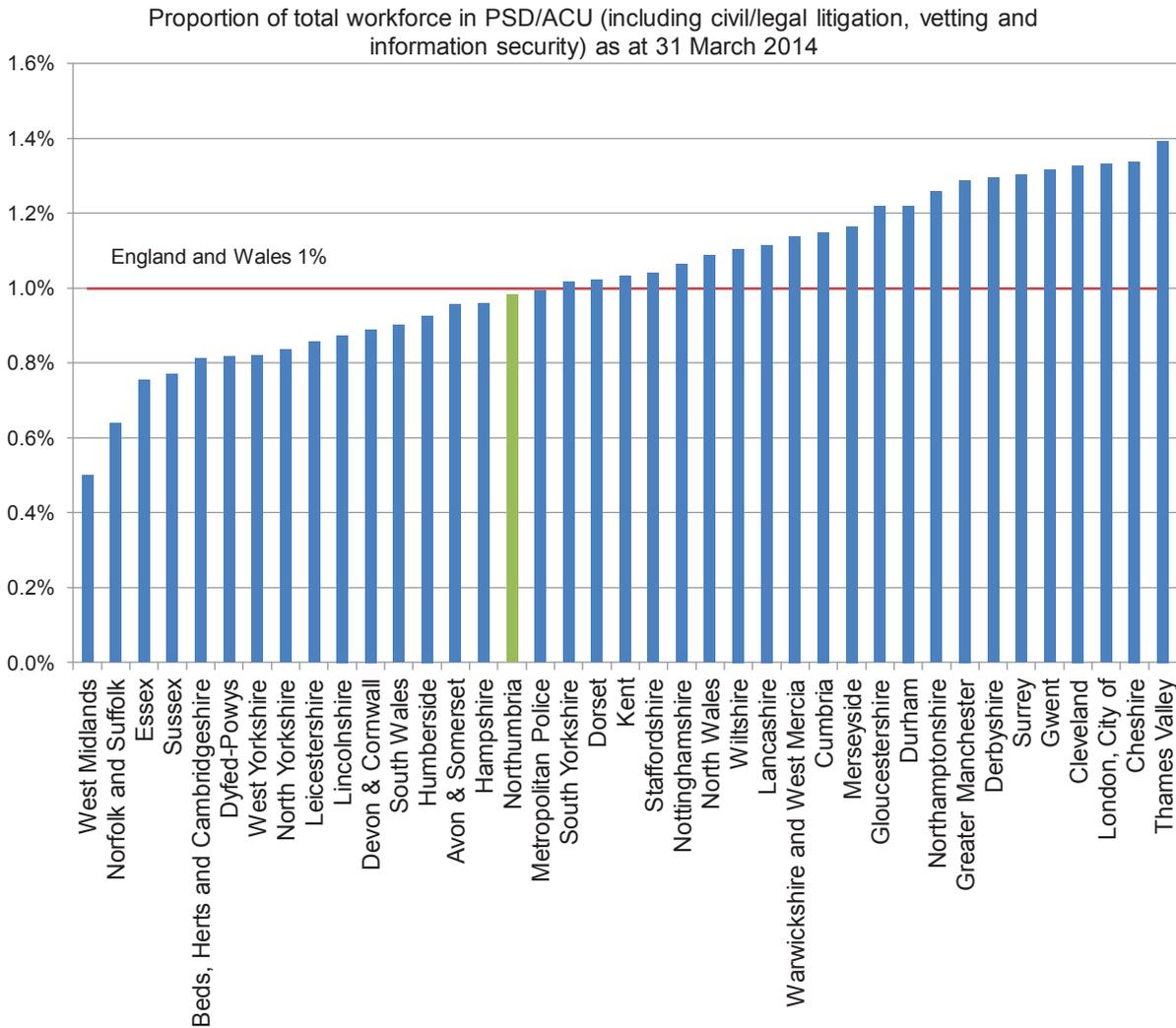
Proportion of workforce in
PSD/ACU

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*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 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.

HMIC's 2012 progress report, *Revisiting police relationships*², stated 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 service³. 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/ 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

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 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 found that Northumbria Police had made good progress overall since 2012.

HMIC had highlighted two linked areas for improvement from the 2012 inspection report:

(1) Integrity health-check

In 2012 HMIC found that since 2011 Northumbria Police had conducted a force-wide integrity 'health-check', using the self-assessment checklist provided in HMIC's 2011 report, *Without Fear or Favour*. The force had either updated or was currently reviewing several policies including relationships with the media, accepting gifts and hospitality, social media use and police officer staff having second jobs. However, more was required to check that staff had read and understood the policies.

(2) Integrity training

There has been training on integrity issues since our last inspection in 2011. Changes to policy and procedures are communicated via email and the force intranet, but again there is no mechanism to check that officers and staff have read and understood them.

In response to the 2012 report, Northumbria Police compiled an action plan called an 'integrity improvement plan' to ensure continued progress. This plan set out a training plan for all police officers of inspector rank and above. This training has been completed. It covered all aspects regarding integrity with the requirement for the input to be passed on to staff with the opportunity for face-to-face discussion. The force placed considerable emphasis on personal interaction and had included examples and dilemmas for discussion. This was clearly aimed at driving up knowledge and understanding of relevant policies.

In addition, each area commander led various local initiatives to improve staff awareness of integrity-related issues. The force had adopted a similar process for training staff regarding the new College of Policing initiated Code of Ethics, with an emphasis on face-to-face contact with the entire workforce and plans in place to survey staff to check their understanding and address any gaps in knowledge in the future.

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

There is strong leadership from the chief constable. There have been chief officer roadshows, and local senior management teams (SMTs) have been provided with comprehensive briefing packs on integrity and Code of Ethics information that they had been tasked to personally deliver to all personnel in the force. These briefings include a narrative to reinforce corporate messages as well as a number of dilemma-type discussion exercises.

Among those spoken to in focus groups and within reality checks, which included unannounced visits to stations, HMIC found that there is a definite climate of ethical behaviour and a professed willingness among staff to challenge inappropriate or corrupt behaviour. It was apparent that staff interviewed generally have a good understanding and awareness of the boundaries between unprofessional and professional behaviour. They also demonstrate an understanding of how unprofessional behaviour might affect both the public and their colleagues.

HMIC found that the vast majority of leaders in the force, including first-line supervisors, lead by example and also demonstrate their personal commitment to ethical behaviour. The promotion and encouragement for staff to demonstrate ethical behaviour in both their public and private lives has been reinforced by the current drive on the Code of Ethics.

The Code of Ethics has been seized by Northumbria Police as a means of driving up professional standards. The launch has been personally led by the chief constable and strongly supported by her chief officers. HMIC found that training on ethical and professional behaviour has now been delivered to all staff as part of the Code of Ethics, and that there are plans to cement this learning by follow-up training and in other training courses where the Code of Ethics is to become integrated.

There are plans to continue this drive by means of continuous messaging from the chief officer team to incorporate the elements of the Code of Ethics into promotional processes and to test the level of knowledge and acceptance of the Code, as well as to identify any further work that needs to be carried out. HMIC supports, as good practice, the training department's plan to take matters forward and review all training provided with a view to incorporating Code of Ethics issues into all aspects, as a golden thread that will be constantly refreshed.

HMIC found evidence to suggest that staff are aware of their responsibility to challenge and report misconduct and unprofessional behaviour, and that by and large they feel supported should they have to do so. However, the force could have done more to test this. HMIC saw that there was a good opportunity, having carried out the first phase of the Code of Ethics awareness training, to test staff understanding.

In Northumbria, there is a policy outlining the obligation to declare any change in circumstances in an officer's or staff member's personal associations and relationships, and officers and staff members are aware of their obligations in this regard.

The National Decision Model (NDM) is in use throughout the force. HMIC found that officers and staff, especially among management grades and those in key areas of the force (such as control room, firearms and public order management) regularly use and understand the principles involved. A decision has been taken to replace the centre portion of the NDM (which is required to be considered in all decisions) in the force mission, vision and values with the Code of Ethics, thus ensuring that the code becomes day-to-day business for the force, with staff being asked about their decision making in post-incident debriefs and review.

Overall, HMIC found a strong and robust level of chief officer leadership for integrity issues. The high visibility of the chief constable, together with effective governance meetings, afforded positive and clear direction that is widely recognised by force members. These messages encourage positive behaviour, explain boundaries of acceptable behaviour and promote a culture of challenge, together with the reporting of wrongdoing. HMIC found messages on the intranet, on widely circulated posters and in briefings to staff from chief officers about the proactive stance taken in relation to promoting the code.

In addition to the weekly meetings between the deputy chief constable, the head of the professional standards department (PSD), the head of human resources (HR) police staff associations and unions, the force has recently set up a critical incident review board. The terms of reference for the board include review and learning the lessons from recent critical incidents and events, including complaints and misconduct. The board is still in its early stages of development and there is potential for it to provide a powerful means of debriefing and learning from experience within Northumbria. In a bid to reassure staff that they should remain confident and empowered to make operational decisions, there is an emphasis on supporting officers who have made 'honest mistakes for the right reasons', and a view expressed among force leaders that the force should adopt a proportionate and fair response to alleged or suspected misconduct. The need to be both fair and transparent has also been driven home during briefings to officers regarding the Code of Ethics.

HMIC found that chief officers provide sufficient information to the police and crime commissioner (PCC) to enable effective governance and accountability on integrity issues, with regular provision of high-level data and briefings on emerging issues as required.

The regular joint meetings chaired by the deputy chief constable with attendance from the heads of the PSD, HR, police staff associations and unions are said to be effective and productive. This affords integrity issues to be actively monitored and fed back, as appropriate to chief officers through other governance meetings, in a way that allows them to fully understand the issues and identify the need for action. The deputy chief constable has recently chaired some 70 sergeant to inspector promotion interviews in which he has included questions to test the candidates' knowledge and understanding in relation to police integrity and corruption as well as the Code of Ethics.

HMIC found that policies or guidance are in place that clearly explain the meaning of misconduct and unprofessional behaviour and describe the acceptable boundaries, including expectations of staff in their private and professional life. However, there remains doubt in the minds of some officers spoken to during the inspection over aspects discussed in force roadshows, and repeated reference to the Code of Ethics and relevant policies should be actively encouraged. The launch of the Code of Ethics in the force has possibly served, among other things, to encourage staff to reflect upon their understanding of integrity issues and perhaps to question or challenge previous preconceptions.

The force uses an e-learning tool, NCALT, but has reservations about doing so as a medium to spread the messages around ethics and anti-corruption. While it would allow the force to understand the number of staff exposed to the e-learning package, the view was expressed that this is not a measure of quality of learning and thus face-to-face personal interaction is favoured over distanced learning approaches.

Understanding integrity

HMIC found little evidence of staff survey work being used to understand how integrity issues affect public trust. Chief officers indicated that a plan is being shaped to audit the force following the launch of the Code of Ethics to understand the success and identification of next steps to embed the Code in the thinking and behaviours of its staff. There was evidence to suggest that details of all occasions when officers and staff are offered gifts or hospitality are being recorded and that they are held in a central repository. However, it was apparent that, while details of some incidences when gifts and hospitality are not accepted have been entered, not all staff fully understand the need to record incidents when such gifts and hospitality have been declined. However, this inspection did not provide a comprehensive audit of the application of all the policies that the force has in place. HMIC was nevertheless assured that there is regular review by the head of the PSD, details are published on the force website and that any inappropriate entry will be challenged.

With reference to requests for authorisation for business interests, HMIC found that all occasions when officers and staff have applied for authorisation for secondary employment or business interests (SEBI) have been recorded fully in a centrally held repository. Each case is taken on its individual merit and refusals are also recorded. Applications that are refused are followed up when information is present that suggests the member of staff is undertaking the refused activity. There was no evidence that business interests are either regularly reviewed or audited. There appeared to be no regular means of notifying the supervisors or command team, when a person was posted from one position to another within the force, that the officer or staff member might in fact have a current business interest.

The 2013 strategic assessment included an action to review the notifiable associations policy but a document dated 31 March 2014 indicated that no action had yet been taken. HMIC suggested there was an opportunity to move forward and provide greater clarity. It was also suggested that a section on annual performance reviews could be included to check and review any changes of circumstance relating to business interests, notifiable associations and reminders about gifts and hospitality entries.

There is a need for greater levels of proactivity in this regard to ascertain any links between this area of potential risk and resulting misconduct, which might adversely affect the reputation of the force.

Recommendation

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

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

Misconduct and unprofessional behaviour

Misconduct and unprofessional behaviour are considered in the decision making before transfer to sensitive specialist roles and promotion for all positions, including applications for accelerated promotion and to attend the senior police national assessment centre, a precursor to attendance on the strategic command course and promotion to chief officer.

A chief inspector, employed in the professional standards department (PSD) under the job title 'assessor', is responsible for viewing all complaints and allegations coming into PSD about wrongdoing, and for making an assessment as to the initial action required. This post is a valuable one in the PSD because it ensures consistency and corporacy in decision making around complaint management, and it is good practice. There are plans to make this post a staff rather than police one in due course for greater levels of continuity.

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. A good level of proactivity was evident in these respects. At disciplinary hearings, previous cases are cited to ensure consistency and panel chairs are briefed on background in terms of organisational expectations and sanction. With regard to both meetings and hearings, PSD monitored and provided guidance and advice when appropriate. Staff involved in these processes are all trained. Legal expertise from Queen's Counsel (QC) has provided specialist external training. The QC also provided input to PSD around proportionality and visited as recently as 2013. The force ensures that staff associations are involved and present when decisions are made as relating to issues such as alleged gross misconduct.

There are confidential mechanisms, supported by policies, for staff to report wrongdoing. These include a confidential reporting line directly into the PSD. Previously the force was using an external agency, 'Crimestoppers', but the cost versus perceived benefits in recent times of austerity resulted in the return to the force-held 'confidential line'. There is also an 'open' email address within the department where concerns can be raised. However, steps are being taken to initiate a system similar to that used in other forces whereby reporters of wrongdoing, or other informants requiring absolute confidence in their confidentiality, could use force IT systems without fear of being identified unless they wished to be. HMIC found some confusion among staff about the options open to them in terms of confidential reporting, and some scope for development in this area of professional standards. HMIC was satisfied that staff throughout the force are well aware of their obligations to challenge wrongdoing and inappropriate behaviour in the workplace, and most believe they will receive support in doing so without fear of adverse consequences. This confidence was expressed among leaders, officers and staff within junior ranks.

An area of good practice discovered during the inspection was an initiative launched by the police and crime commissioner (PCC). Having discovered low levels of customer satisfaction in relation to management of complaints within Northumbria, she set up a process known as 'Triage'. This meant moving three staff from the force into the office of the police and crime commissioner (OPCC). Triage was the first point of contact between the complainant and the police, and acted to reassure complainants that the force was eager to listen to their complaint and deal with it appropriately. The PCC reported that following this initiative public satisfaction in relation to complaints improved dramatically and it was reported to be 92 percent at the time of our inspection. The initiative is receiving interest from a number of other forces and central government. It is aimed at demonstrating to the public that Northumbria Police is more than willing to listen to and action complaints against the force. It has been found that this 'golden hour' intervention in itself does much to reduce feelings of frustration previously experienced by complainants, and to assist in the likelihood of speedy resolution and increased customer satisfaction. This can only help in improving public trust and confidence. Importantly, this is a virtually zero-cost initiative, which, although successful, remains under evaluation.

There is an acceptance of the need for timeliness by staff interviewed within the counter-corruption unit (CCU) and PSD, both of which have been reduced in capacity in recent times. However, the emphasis on timeliness remains a pressure felt by staff in both units.

Professional standards training and resourcing

HMIC found that staff in both PSD and the CCU are in general well trained and competent in their roles. One reason is that there has been little staff turnover in the departments for some time. Staff who have been recruited for PSD roles with prior relevant qualifications commented that they have received little training since appointment. PSD is predominantly staffed by accredited police staff investigators consisting of a blend of police officers with a pre-existing level of expertise, and civilian staff who have been professionally accredited. Staff working in the CCU are predominantly police officers except for one dedicated analyst, one researcher and one investigator. Current staff are all nationally accredited and police staff are designated by the chief constable to exercise powers under the Police Reform Act 2002.

Northumbria PSD, as with other areas of the force, has been subject to budgetary cuts and downsizing during recent austerity measures. Despite having been forced to downsize, PSD was given the capacity to provide an appropriate level of service. Significant reductions have been felt in the CCU, which was at one time capable of running covert operations without recourse to mutual aid or the Serious and Organised Crime Agency (the precursor to the National Crime Agency [NCA]). Its current establishment allows it to work effectively and, when assistance is required, this has been provided by other forces in the region or the NCA. Partly as a result of the downsizing that has taken place, the subject of succession planning has not really been an issue of concern, although the deputy chief constable advised HMIC of one post that has been held over to enable staff with the required skill set to fill the vacancy.

Misconduct hearings in Northumbria are constructed to ensure transparency, effectiveness, efficiency and legitimacy. This includes using an appropriately qualified presiding officer who is independent of the person investigated. All staff spoken to by HMIC supported this view. All hearings are tape recorded with access to appropriate advice and guidance for the presiding officer. The force makes use of fast-track dismissal when appropriate, although this is only ever considered after consulting legal advisers.

Quality assurance

The deputy chief constable reviews hearing outcomes, as does the head of PSD. This serves to add quality control to the process. On the occasions when there may be unanticipated outcomes, the head of PSD reviews and debriefs the process and outcomes with the meeting chair. The PCC also has an interest in and follows police appeal tribunal outcomes.

The regular meetings regime between the deputy chief constable, heads of PSD and human resources (HR) and staff associations includes a section in which ongoing disciplinary matters are reviewed to ensure that they were proportionate as well as justifiable. This review allows for cases to be escalated or de-escalated appropriately. This level of hands-on and joint oversight of cases, both among police officers and police staff, assists in ensuring consistency, timeliness and quality of all investigations conducted in relation to officers and staff, whether they are carried out by PSD or another department (for example, HR or local policing units).

There is, however, acceptance that matters investigated at a local level can be handled in a more timely manner. The force plans to address this by introducing a workflow IT system that assists in tracking and flagging out-of-date enquiries. The stated intention is to impose a general 28-day time limit as a standard, which could then be monitored. HMIC conducted a review of a small number of PSD cases. This included reviewing up to ten randomly selected cases involving serious misconduct or criminal conduct. The aim was to check on timeliness, supervision and appropriateness of decision making.

The force is not making much use of the Independent Police Complaints Commission (IPCC) bulletin to disseminate learning. Some staff report having seen the bulletin on noticeboards and also email notifications following possible critical incidents. Other staff in key positions have mentioned that they only see the IPCC bulletin on a sporadic basis; they regret this as they feel it is a useful learning document. However, HMIC inspection staff felt this issue could be more comprehensively addressed as learning opportunities for the force. In addition, a newly inaugurated critical incident board has the potential to act as a catalyst for the development of a range of information and training initiatives to improve conduct and professionalism as well as to mitigate risk. There were examples of how this learning can be effectively distributed. One example quoted to HMIC involved a near miss incident involving police who had been deployed onto a railway line. Following the incident, a short video was circulated widely around the force. There is no regular publication, as can be found in other forces, of a PSD-based news circular that highlights current trends in complaints and common mistakes. This information could help officers and staff to prevent themselves falling foul of the discipline code.

Recommendation

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

There is a policy and consistent decision making on suspension. The deputy chief constable reviews and gives careful consideration to all cases where there might be a retirement or resignation during the investigations, and reportedly takes a robust line. All decisions are fully recorded with rationale in policy logs, and records are kept by the staff officer to the deputy chief constable who attends and minutes all relevant meetings.

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

Investigating corruption

Tackling corruption is a strength for the force. There was good evidence to suggest that Northumbria Police regularly, proactively and effectively identifies and manages threat, risk, and harm from corruption as part of its governance structure. The structure includes the assessment of risk, proactive action to mitigate it and monitoring procedures whereby actions are tracked and action owners held to account. At a strategic level there is an annual strategic risk assessment, which informs the force control strategy and in turn guides the activities of the counter-corruption unit (CCU) and professional standards department (PSD). Information from within this specialist area can also be found within the wider force strategic assessment.

In terms of information security, new systems are subject to technical risk assessment agreed with the senior information risk owner (SIRO) which provides a methodology for identifying risks and offers steps to mitigate them when possible. Existing systems should already have gone through a similar process. The force reported that regular reviews are required but, because this is a challenging process, the reality is that only main systems get checked annually. The CCU reports emerging threats or issues to the information manager who has the facility of the high tech crime unit to assist if required. Northumbria Police has a guidance document, 'Access to removable media (including CD writers, cameras and USB memory sticks) on force systems', which supports the force information security policy. The force has also put measures in place to reduce or manage security risks from removable media. In addition, there are various policies in place to ensure the effective security of force systems. These include staff use of email, social media, information sharing and internet use. The force has a service confidence procedure document providing details of how it would restrict an individual's access to the force systems if integrity issues were apparent or suspected. The document clearly details the procedures to be followed.

Practically, the force ensures the effective security of systems and exhibits, but not case papers. The CCU focus group uses an iBase system and the Home Office Large Major Enquiry System (HOLMES) is being introduced to the serious and organised crime unit. The CCU runs its own exhibits books and has its own dedicated exhibits store. The force property system is accessible on force systems and procedures have been reviewed following an incident involving theft from a property store.

Senior staff within the procurement office are subject to management vetting with an annual review, and this department is also subject to internal audit every year. The department is alive to the threat of corruption and has ensured that this threat to the organisation features in the Northumbria Police procurement risk register. Additionally, staff are required to review and refresh declarations of personal changes of circumstances or professional conflicts of interest, as well as notifiable associations, on an annual basis.

Within PSD and the CCU, there is a weekly tasking process. This information is passed to the head of PSD who in turn briefs the deputy chief constable on a weekly basis. Issues such as threat and risk of harm are considered as part of this process.

HMIC found established and NIM-compliant approaches to counter-corruption. Any information coming into the department is entered on an intelligence report and assessed as to both reliability and whether it can be actioned. If information is deemed reliable and able to be actioned, then it is developed to a point where it can be passed to operational officers to assess and progress. The process is subject to weekly scrutiny by CCU management who dip sample for reasoning and decision making. The weekly meeting is therefore effectively a tasking meeting where every piece of work is allocated a 'policy book', where, when finished, a closing report would be included. Prioritisation in terms of tasking is conducted through the weekly meeting; actions are tracked and monitored through this process and the action holder is held to account.

The force regularly and proactively identifies vulnerable staff and groups by a number of means. These include the monitoring of police officers and staff who have previously come to notice, and training for inspectors, delivered in 2013, which included specific input on professional standards including warning signals for those who might be vulnerable to corruption. The force uses the NCA counter-corruption threat assessment, and identified areas of vulnerability are targeted. The force also uses an iBase intelligence system where all incoming cases are recorded, and which flags officers who have come to notice on other intelligence threads. The force also makes use of the vetting processes to identify individuals who could be vulnerable. A local policing commander interviewed expressed confidence in the proactive ability and capacity of the analysis function within the CCU.

Northumbria Police regards vetting as a proactive means of identifying vulnerable staff, and vetting arrangements comply with the national vetting policy. These measures are designed to not only identify corruption risks at the recruitment stage for officers and staff: they are also routinely revisited on promotion and transfer, especially to sensitive posts. The CCU has, however, identified the continuing threat to the organisation from recruits implanted by organised crime gangs who could be targeting the police service. Thus the force is not complacent and a healthy relationship is maintained between the vetting unit and the CCU.

The force is exploring options for the monitoring of force systems and social networking sites, and a project is reportedly under way to put in a protective monitoring system. Monitoring was said to be a labour-intensive and reactive process mainly conducted by the IT department. Otherwise, external sites could be monitored on a 'with cause basis'. The force assessor has responsibility to ensure that such activity is consistent and proportionate. An example was given to the HMIC inspection team involving the use of a Twitter account by an officer who was found to have made inappropriate comments relating to a police and

crime commissioner (PCC) in another force area. As a result, appropriate disciplinary action was taken against the individual.

Procurement checks and balances are in operation with PSD being provided with a list of procurement contracts including details of companies, value and products involved, and contract renewal dates. The procurement department operates a 'strictly no' gifts or hospitality policy.

Northumbria Police has discontinued the use of random drugs and alcohol testing on the grounds that in times of austerity it is difficult to financially justify a measure that was proving costly and failing to deliver any hits. The random drug-testing policy has, however, been retained and a number of staff in the organisation believe that the force is still operating the policy actively. While 'with cause' drugs/alcohol and integrity testing does occur, HMIC recommends the force to reintroduce random testing, perhaps within a more limited and focused regime concentrating on the most vulnerable areas of the force. Results of testing that does occur are not circulated to the force and this was seen by HMIC as an area where better information circulation would highlight the issues and demonstrate that the force is actively working to protect officers, staff and its organisational reputation.

HMIC found a strength in that the force ensures that organised crime investigations are not compromised. Work to corruption-proof forthcoming operations to reduce the risk of compromise includes processes where only those who need to know are involved and kept fully informed. This is achieved through attendance by the heads of PSD and CCU at fortnightly organised crime group meetings where covert policing initiatives and operations are discussed. There are also good lines of communication between the force and regional units in where corruption concerns have been identified. Consultation is also regularly undertaken in the planning of forthcoming covert operations.

Intelligence

HMIC found that Northumbria Police complies with the draft authorised professional practice (APP) for counter-corruption and also to completion of an annual strategic assessment. Comprehensive analysis is carried out to identify trends and emerging threats. This process has resulted in a prioritised action plan for delivery while permitting the flexibility to address other issues that may emerge. Northumbria Police has good CCU analytical capability dedicated, whenever possible, to analysis rather than working on performance-related tasks. As a result, the force proactively and regularly gathers actionable intelligence on corruption, grading it in compliance with the relevant APP.

There is a weekly tasking and co-ordination process between the CCU intelligence and operations teams during which issues are raised, considered, documented, actioned, tracked and reviewed. Actionable intelligence is therefore acted upon and monitored through a structured governance process whereby intelligence initially developed in the intelligence function is passed to the operations team to further develop by appropriate covert tactics. The results and emerging issues are then fed into weekly meetings with the deputy chief constable.

Through interviews and file sampling, HMIC confirmed the force effectively identifies multiple suspects and multiple offences by a single suspect. The stance of the CCU is to identify and investigate the corruptor as well as the corrupted whenever possible. The CCU analyst seeks to identify multiple suspects or offences through appropriate analysis. The force claims some success with this strategy and, although cost can sometimes be an obstacle, attempts are made to achieve these goals in current times of austerity.

HMIC found that although the CCU and PSD have suffered from cost-saving reductions, as elsewhere in the force, there remain sufficient resources to deal with the flow of intelligence. The head of PSD commented that now the CCU has fewer staff this has required a considered approach to make best use of the resources available. It was also mentioned by a number of staff interviewed that the excellent relations maintained between the force and regional assets, as well as the NCA, afford options for collaborative approaches to dealing with cases deemed outside the capacity of the CCU.

Capability

HMIC found that Northumbria Police, situated adjacent to the Scottish border and historically very much a standalone force, has concentrated in the past in building sufficient capacity and capability to act without support from regional or national assets. The financial strictures placed upon the force have, however, forced a necessary reduction across the board, and this had been felt also within the CCU and PSD. Nonetheless, Northumbria Police still has ready access to specialist assets when required, including technical support and surveillance.

The good governance mechanisms that exist within Northumbria Police afford effective and efficient monitoring of the performance of the CCC. The weekly meetings between the deputy chief constable and PSD as well as human resources (HR) and staff associations, which in turn support the monthly force resources meeting chaired by the chief constable, mean that the force regularly monitors performance. These good governance arrangements mean that the head of the CCU has ready and direct contact with the Association of Chief Police Officers (ACPO) lead on professional standards.

Recommendations

- **Within six months, the force should ensure that it carries out regular audits of integrity-related registers including gifts and hospitality, business interests, notifiable associations, expense claims, procurement activity and other records to identify potentially corrupt activity.**
- **Within six months, the force should ensure that it has an effective process to communicate to all staff both locally and nationally identified lessons to be learned on integrity and corruption.**