



Inspecting policing
in the public interest

Police Integrity and Corruption

Wiltshire Police

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

The force has made good progress since HMIC's revisit in 2012. The chief officer team promotes a culture of professionalism and ethical behaviour. Force policies are detailed and provide guidance across the range of subjects falling under professional conduct and ethical behaviour.

Staff understand their obligation to conduct themselves in a professional and ethical manner which is set by the force and by the Code of Ethics in policing. However, some staff need guidance so they feel confident about reporting misconduct.

Where misconduct is reported the force responds appropriately. Active monitoring of areas vulnerable to corruption is efficient, using a comprehensive system of regulation and auditing of integrity-related performance but more could be achieved with greater analytical capacity.

Summary

The force has conducted a three-year programme to emphasise the importance of standards and values rather than simply performance. The leadership from the chief constable and chief officers is effective and is supported by a well-developed process of communication. The force has focused on an approach known as 'people first', and the application of key principles: honesty and integrity, professionalism, teamwork and personal responsibility. HMIC found that the policies, structures and processes used by the force emphasise integrity demonstrated in the operation of the force's people intelligence board.

HMIC found that the workforce understands this value-based approach and the importance of challenging unethical conduct, but more effective monitoring of force policies is needed and some staff, including supervisors, need further training about the local resolution of public complaints. This would include examples of where behaviour does not immediately require misconduct investigation but requires improvement.

Chief officers demonstrate fairness and proportionality in dealing with misconduct cases. HMIC found the professional standards department (PSD) and the anti-corruption unit (ACU) are effective. There is effective oversight of misconduct investigations by chief officers, but preventive work and intelligence processes required to identify and investigate corruption need further development.

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

Since HMIC's 2012 revisit, the force has developed guidance covering the use of social media accounts. Effective use of case studies is made to provide clear examples of the consequences of improper posts on social media sites, and the force uses special software and other publicly available information to monitor social networking sites.

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 consistently and effectively reinforced the message of integrity so as to develop a force culture which is driven by standards.

There is an effective dialogue between chief officers and the workforce which includes the use of staff surveys to identify the need for change.

The force uses a 'people first' strategy and a statement of force values. This is backed up by effective policies to safeguard the force from misconduct or unprofessional behaviour.

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

HMIC consistently found that staff are confident in reporting wrongdoing, either to supervisors or using other confidential methods. They are also aware of the need to challenge unprofessional behaviour. Some need guidance to enable them to do so confidently and more effectively.

The force uses a people intelligence board as a focus for the human resources (HR) department decisions including taking account of conduct and integrity issues before promoting staff.

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

The force has a comprehensive integrity and standards development plan which is regularly reviewed at the people intelligence board.

HMIC found that there is an effective co-ordination process which includes the HR department helping to direct investigations. The process is supported by intelligence work intended to identify vulnerable groups in accordance with the national crime agency counter-corruption standards.

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?

There is a well-established relationship between the force and the police and crime commissioner (PCC), and effective governance arrangements have been established.

Leaders have been assessed to check how effective they are in identifying their individual development needs.

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

The force has effective policies that safeguard integrity, including those on gifts and hospitality and business interests but further processes to check compliance when conditions are imposed by the force are needed.

HMIC found that the PSD is effective but more work is needed in cross-referencing records held by the force to identify potential misconduct issues.

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

Vetting arrangements are compliant with national standards.

The force carries out random drug testing but has not recently undertaken intelligence-led testing.

HMIC found effective security for case papers, exhibits and force systems.

The ACU requires more analytical capacity and the force has recognised a need to reinforce counter-corruption with more resources.

The force/constabulary in numbers



Complaints

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

469

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

25.7

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

67

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

3.7

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

2.6



Business interests

Applications in 12 months
to March 2014

233

Approvals in 12 months
to March 2014

161



Resources

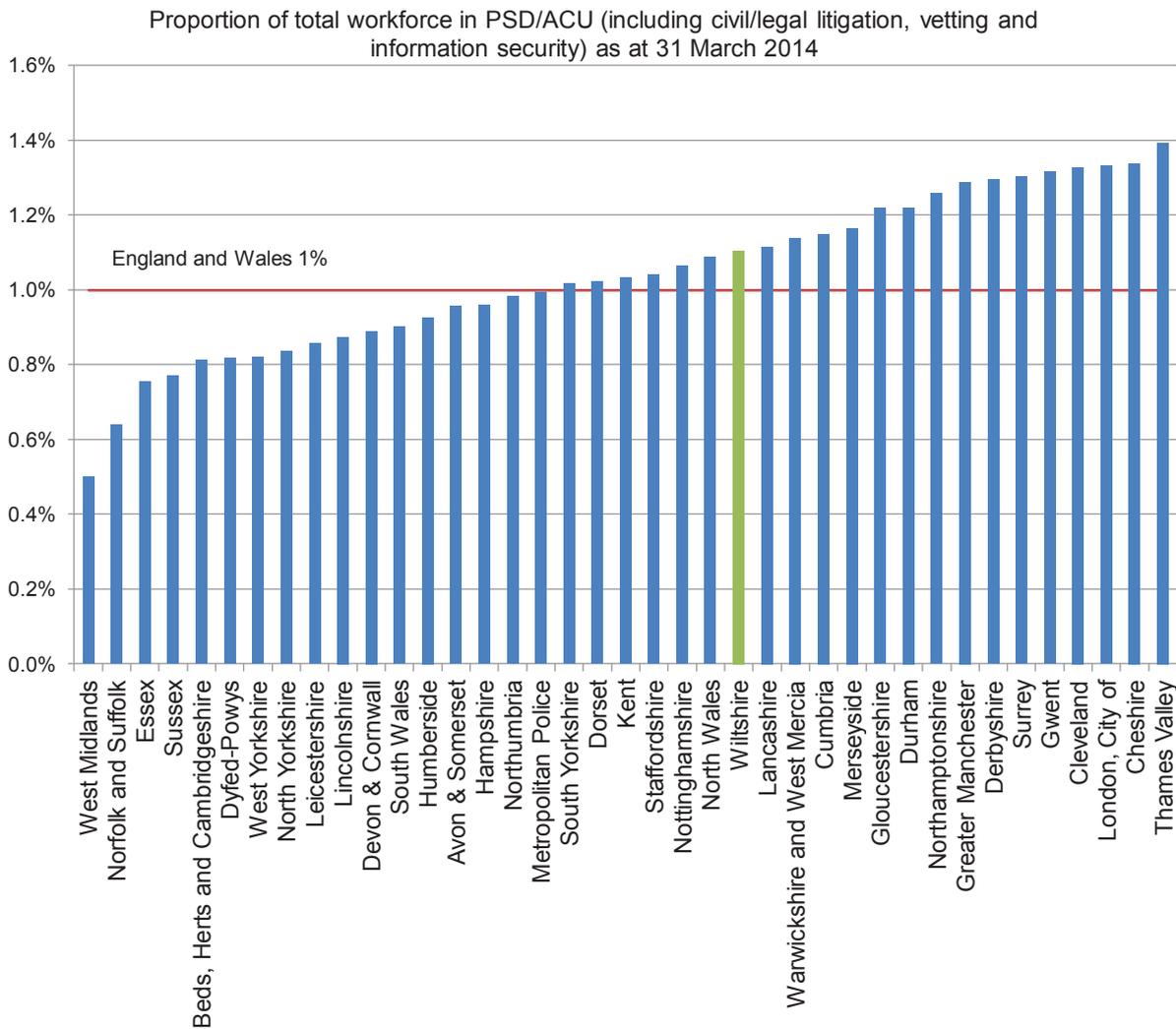
Proportion of workforce in
PSD/ACU

1.1%

Proportion of workforce in
PSD/ACU
– England and Wales

1.0%

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



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.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

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?

Since its 2012 revisit, HMIC found the force has made good progress. The force has developed guidance covering the use of the force's own social media accounts designed to keep in touch with communities about policing issues, as well as social media accounts used privately by staff. The force uses case studies to provide clear examples to staff of the potential consequences of ill-advised posts on social media sites. To ensure compliance, the force uses special software and other publicly available information to monitor social networking sites. The force has updated its media policy and guidance. This outlines how relationships with the press should work, and includes a requirement for staff and officers to record contact with journalists.

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 that the chief constable champions the requirement for professional conduct and ethics and is supported by his chief officer team. Expectations of standards and values are clearly explained to all staff through an effective communication process. There is evidence that staff perceive the chief officer team as setting a positive example through its own behaviour.

The force is seeking to change its culture supported by the inclusion of ethical standards in all force policies and procedures. The chief officer team uses an online discussion forum to engage staff on issues relating to values and standards. Articles on professional standards are published in the force magazine and on the intranet. A range of other features are used including: applications on mobile phones to share information; leadership blogs; a standards campaign; an internal magazine; e-briefing; the use of questionnaires; surveys; focus groups and senior manager interviews to develop staff understanding.

There is clear evidence that this integrated communication process has been effective and has ensured that most staff recognise the significance of this values-based approach and the importance of challenging unethical conduct.

HMIC found that the use of the force's people strategy as a central theme in managing and developing staff has created an inclusive and open dialogue with staff. The office of the police and crime commissioner (OPCC) has conducted a review of the professional standards department's performance.

There is evidence that some staff may be reluctant to report unprofessional conduct. A 2014 staff survey indicated that only 47 percent agreed that the organisational culture was one in which staff felt able to report wrongdoing. However, during the inspection, HMIC found more positive evidence of a willingness among staff to challenge. We 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 cases reviewed also provided evidence of people making reports about the behaviour of colleagues.

The force has used the 2014 staff survey results to improve the confidence of staff to challenge misconduct when it happens and to ensure that there was full support for those who raise concerns.

The force already had well-established levels of awareness among staff of its key values and standards. It was therefore ready to integrate the new Code of Ethics and this is reflected in the progress it has made. There has been effective planning in the process to inform staff on the new Code of Ethics. There is a range of documentation available and

evidence which supports the successful communication and adoption of the code as a key element in force plans.

HMIC found that the arrangements between the force and the police and crime commissioner (PCC) reflected a strong and effective relationship in the oversight of misconduct and integrity issues. The force provides sufficiently detailed information to the PCC. The scrutiny process by the PCC includes corruption prevention, misconduct, complaints and unprofessional behaviour issues. Regular governance reports are produced by the force concerning a range of aspects regarding performance of PSD and these are used to improve the service provided to the public.

The force uses a series of formal meetings, supported by policies and protocols, where performance issues are managed and the progress of work on misconduct and anticorruption is discussed. Integrity issues, misconduct and unprofessional behaviour are actively monitored by chief officers to understand the issues and identify action with objectives, timescales and clear lines of accountability.

Wiltshire Police was one of nine pilot forces which established an ethics and standards board to guide policy. The force has also introduced a people intelligence board (PIB) as part of its people strategy. This innovation ensures the force applies ethical values in its processes and reinforces the requirement that all members of staff uphold the force's organisational values.

The PIB regularly reviews the force integrity and standards development plan and makes sure any tasks are being efficiently completed. The PIB also carries out a regular and detailed review of PSD performance and of significant cases relating to police staff, police officers and trainee officers. Decisions with reasons are properly documented.

HMIC found the PIB has established an effective process, providing oversight of misconduct case management, and responding effectively to emerging trends. There is a system in place for the annual review of all policies and this is actively monitored.

Understanding integrity

Most staff members understand the reasons for the force's focus on integrity. In the 2014 staff survey, 81 percent of respondents said that they were 'supportive of the force's purpose and mission' and 85 percent said that they had 'a clear understanding of the values and behaviours of the organisation'.

The force has a clear policy outlining the obligation on staff to declare changes in circumstances affecting personal associations and relationships so that any risks can be assessed. The policy has been reviewed and was up-to-date at the time of inspection.

All notifications are reviewed and an investigation is carried out in appropriate cases. Briefings on associations and relationships are given to all staff. The evidence from the inspection suggests that staff know the requirement to report such associations and examples were provided where officers and police staff had voluntarily notified the force of changes in their personal circumstances and had thereafter agreed to ethical interviews. These interviews were carried out by the ACU staff and involve advice or instructions as to how to reduce risk for the individual or the force.

Similar interviews were also conducted where anonymous information had been provided about inappropriate associations to check if there was any basis or cause for concern. HMIC found that the ethical interview process effectively reinforced professional conduct by staff, and avoided the potential for future problems.

The force had engaged an external company to manage an annual staff survey to assess attitudes and their views of the force. The survey results were reported to staff and had been used to shape force policies.

HMIC found a concerted effort has been made to increase the number of staff completing the surveys and also to demonstrate understanding of the issues being reported. Public external surveys are being developed by the force as part of its wider consultation plans.

There is a comprehensive policy covering the circumstances in which staff might accept offers of gifts or hospitality. The force records when officers and staff are offered gifts or hospitality in a central database. This includes occasions where the offer is not accepted. Records are the subject of regular audit, and all inappropriate entries are challenged or investigated. Information about gifts and hospitality received is published on the force website which provides details of the policy, the register and details of gifts and hospitality offered and whether or not they were accepted. Despite the existence of these policies, HMIC found that some staff remained uncertain about their practical application; for example, some staff were unsure of the circumstances where it might be appropriate for them to accept even basic hospitality at the scene of a crime by the victim.

Gifts and offers of hospitality made to chief officers are considered using a peer review process so that an offer made to one chief officer is reviewed by a different chief officer. There is some cross-checking by the ACU of gifts and hospitality offers against chief officer diary entries. While these methods did provide a level of scrutiny, more robust and independent mechanisms would demonstrate greater transparency.

The systems operated by the force are generally robust but HMIC found that no real analysis is done to identify repeat offers or frequent contributors, which may indicate trends or unethical behaviour. HMIC found that the practice of examining diaries against gifts or hospitality offers does not extend to the diaries of senior officers and managers, or include procurement procedures or other registers of information used to safeguard integrity. HMIC found that more independent and transparent scrutiny is needed.

The force has authorised some 400 business interest applications to date and these are centrally recorded. Business interests for which approval is required include voluntary activities such as charity work or the role of school governor. A further six applications have been withdrawn and five have been refused. Notably, the force has rejected business interest applications involving the promotion of utility service providers.

During the inspection most staff confirmed that they were aware of the need to register business interests, the process to be used, and the reasons for the register. The force includes consideration of notified business interests as part of the staff performance appraisal process. This provides the opportunity for supervisors to explore any effects of secondary employment on their staff.

Rejected business interests were investigated by the force only if intelligence indicated subsequent non-compliance by the applicant. HMIC found this approach was too reactive and risked inaction in circumstances where no intelligence was reported, or could not be developed. Similarly there was no consideration of follow-up checks to verify the information supporting applications which were subsequently approved.

There were examples of some analysis within the PSD to identify trends in relation to integrity issues but these were on a case-specific basis and the opportunities to undertake this more widely were limited by the absence of a dedicated analyst post in the department.

The planned recruitment of an ACU analyst is a positive development and will extend the capability of ACU while also restricting potential breaches of confidentiality by reducing the need to task analysts outside the unit.

Recommendation

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

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 a strong interest in developing promotion and selection processes to reinforce ethical practice. This includes the consideration of individual misconduct and behaviour as part of decision-making.

The PIB plays a significant role in considering staff for promotion, transfer of post and individuals identified through concern for their conduct against all information the force knows about them. Ethical conduct is a key issue and is examined by the board with a thorough understanding of the organisational requirements. The scrutiny also applies to applications for courses such as the strategic command course and the high potential development scheme.

HMIC found that the force applies a consistent approach to misconduct investigations and hearings. There is joint decision-making involving HR and the PSD.

The scrutiny provided by the PIB is a key factor intended to ensure fairness. The force also uses the process to audit misconduct investigations and hearings and to identify relevant points of learning to achieve improvement throughout the system.

The force operates confidential internal and external systems available for staff to report misconduct. The systems are explained to staff and the PSD staff are clear that they are operated confidentially, and policies governing their use are adhered to by the department.

We found, from the cross-section of staff we interviewed, that staff are confident that they can report unprofessional behaviour confidentially and there are few concerns that they would not be supported or treated unfairly for doing so.

The force publishes the gifts and hospitality register on the internet. It includes details of the donors, and of those items offered. The information is easily located and clearly presented. There are some gaps, however, in the information recorded. For example, in 2012 the published details showed hospitality and gifts offered to officers of different ranks, and the monetary value of items offered. In 2013 and 2014, however, the published entries related almost exclusively to the chief constable and for most of the items no value was indicated.

Details of chief officer and PCC expenses and business interests applied for (accepted and refused) are also recorded centrally and published.

To improve awareness of recent issues and lessons learned, the force ensures that details of misconduct hearings are published to all members of the force. The same information is used by the PIB to assess trends and organisational development issues.

HMIC found that most staff understand high-level force values and standards but there are

gaps in understanding; not all staff were confident in their knowledge of force policies when asked to apply their knowledge to situations.

The force had already recognised that gaps exist in the scope and depth of the training that was available to its staff. At the time of the inspection there was active consideration as to how this could be improved. A specific requirement was the need to better equip sergeants and inspectors to manage misconduct effectively at a local level.

The Independent Police Complaints Commission (IPCC) bulletin is circulated among staff within the PSD and has some circulation to those involved in the custody department. However, it is not being more widely distributed among members of the force. The IPCC bulletin contains useful learning from other forces experience and it would be of benefit if the force ensured that the document, or extracts from it, were more effectively used for organisational development.

Professional standards resourcing and training

The force has undertaken considerable work to ensure that staff are aware of the need to comply with its policy on social media use. The PSD uses case studies to provide examples of the negative consequences that can result from the improper use of social media.

Prior to being provided with a force social media account, staff were required to complete and submit a signed social media account agreement which formalises the expectations and controls that apply.

The social media policy is supported with an effective social media guidance booklet available to all staff, and everyone in the force had been emailed by a chief officer emphasising the correct use of social media and providing practical guidance.

All leaders in the force have undertaken personal assessments to help understand their management style and each individual has been trained in managing effective conversations with their staff and improving standards.

The level of training in relation to these interpersonal skills is high but HMIC found that understanding of the practical ways in which low-level misconduct should be managed was inconsistent. Frontline managers and supervisors have received limited training to undertake local resolutions for reported complaints and HMIC found gaps in skills and confidence in this area.

The force has delivered training to its staff on the National Decision Model (NDM) and there are examples of the model being used in a variety of policing situations.

The force reinforces a values-based professional approach in the training courses available

to staff. There is a reliance on computer-based learning, though it is recognised as an efficient means to convey information about basic skills. This type of training was reported by many staff as ineffective in developing understanding of more complex issues by several of the people who had undertaken it.

The staff in the PSD and the ACU are predominantly serving or retired officers with backgrounds in criminal investigation and training. All staff in these units have received vocational training in specialist subjects including investigating corruption and unethical conduct.

Staff from the PSD have given training inputs to courses for specialists and newly promoted staff.

The force is able to make informed decisions in the selection of senior leaders for particular posts through the PIB process, which provides a detailed profile of experience and qualifications of potential candidates. This is in line with the approach by the force to ensure more effective people management. Superintendent postholders have been carefully selected to fill the new force structure. The new head of the PSD has specialist knowledge of anticorruption investigations which reflects this approach.

HMIC found that the force understands the need to target unethical staff proactively, and the methods required to do so. At the time of inspection some of these methods were not being fully deployed but there was work in progress to do so.

The force has integrated the PSD and human resource (HR) department under one command function. The reputation of the department within the force is positive and it has concluded cases of a complex and sensitive nature. The force uses the Centurion case management system and this contributes to more agile work processes.

There are, however, some concerns around the timeliness of recording complaints and the progress of investigations. This issue had been identified by the force governance processes used to manage performance and also through PCC scrutiny. In response, the force is conducting a business review; analysing demand for PSD services and business processes including an emphasis on a proportionate investigation related to the severity of the misconduct reported.

The force manages misconduct hearings to ensure that they reflect the determination of the chief officer team and PCC to reinforce ethical values for all members of the force. The PSD and the corporate communications team co-operate to ensure that results are publicised within the organisation. The head of the PSD vets the presiding officers for hearings in order to ensure that they are independent from the subject of the proceedings. An external appointment is considered if necessary. HMIC saw evidence that the hearings are conducted in an efficient and timely manner.

The force makes use of a fast-track dismissal procedure where appropriate and there is evidence of this being applied robustly where necessary.

Quality assurance

The PIB scrutinises investigations and hearings in order to ensure proportionality and fairness. Investigations are dealt with at the right level and are escalated or de-escalated appropriately. There is evidence of effective case reporting.

The PSD investigations, once underway, are generally well conducted and are concluded in a timely manner. However, HMIC found that some complaints were not being recorded within appropriate time limits and there was also some evidence that some misconduct cases were prolonged.

The force has a clear understanding of the problem and is considering the options available, including an increase in the PSD staff or other measures to reduce workload. These other measures might include a more robust triage assessment, and using the unsatisfactory performance process rather than misconduct proceedings for certain cases.

There is evidence that the more comprehensive oversight of individual performance, behaviour and any misconduct issues through the integrated PSD and HR department provides the opportunity for effective decision-making. HMIC found that this approach was applied to investigations relating both to police officers and staff. The PSD actively contributes to the process and shares responsibility for the decisions taken. This process sits alongside the role and responsibilities of the PIB.

The force has a well-defined and effective process to learn from cases of misconduct. The PIB and people intelligence review meeting undertakes a detailed assessment of discipline cases, alongside a wider range of other material. The corporate communications department is responsible for promulgating the relevant results and details. The PSD also has an effective lessons learned policy and an e-briefing process, and case studies are used to provide information to managers.

The results of hearings are carefully summarised and distributed to all staff on the intranet, and explain the case background and the sanction imposed. This assists in reinforcing the need for ethical behaviour.

The force has a clear policy relating to the suspension, resignation and retirement of police officers and staff during misconduct investigations.

HMIC found the force takes steps to ensure fairness in treatment of staff. Decisions in

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

misconduct cases are consistent and the rationale is documented. All cases are monitored and there is a governance process designed to ensure the most appropriate outcome depending on the circumstances of the case. HMIC found evidence that this was being applied effectively.

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

Corruption investigation

The force has a comprehensive integrity and standards development plan that is based on previous recommendations from a number of key documents, including: the 2010 force strategic threat assessment; national guidance from a range of government departments; and HMIC thematic reports. This plan allocates actions to specific individuals and holds them accountable for reported progress.

The plan is routinely submitted to the people intelligence review meeting. It sets out clear and audited areas of work across a range of topics where the force aims to improve its performance in identifying and preventing corrupt activity and unprofessional behaviour. These included areas such as computer misuse, predatory sexual behaviour and encouraging ethical reporting. HMIC found that the force's approach to designing this process has established an effective means to identify and implement necessary change.

The force also uses a co-ordination process to manage risk, threat and harm. The integrity and standards development plan includes an attempt to identify vulnerable staff groups in accordance with the National Crime Agency (NCA) counter-corruption threat assessment. The PSD and the ACU have been set an objective to develop predictive analysis to identify vulnerability, but this process is dependent on the availability of an analyst.

The force vetting arrangements are set out in a written policy and comply with national vetting requirements. The PIB exercises oversight of this process. There is evidence suggesting that there is an appropriate level of scrutiny during vetting at the recruitment stage. A variety of different information sources are used when carrying out checks to prevent the recruitment of unsuitable members of staff. A vetting process is also undertaken prior to promotion or to a posting to a sensitive role. Where necessary, applicants are interviewed to clarify any concerns or issues.

The force uses CrowdControl software to monitor multiple social networking sites through the use of keywords. Other publicly available information sources are also monitored and the PSD investigates anything of concern. In one example, the force investigated an officer for unprofessional use of social media. The officer was dismissed from the force and the lessons learned from the case were circulated within the force.

The force carries out regular audits of gifts and hospitalities accepted by its chief officers and staff, and this includes examination of their diaries. Offers received by chief officers are also subject of a peer review process carried out by chief officer colleagues.

The force has a policy explaining the need for random and with cause drug testing. There is evidence of a clear understanding of the policy across the force's staff, and most staff know and approve of it. The ACU conduct approximately 120 random tests of staff each year and

the results are published. The force uses intelligence-led drug testing but there have been no such drug tests over the last two years.

The strategic improvement board manages corporate risk and this encompasses all aspects of force business.

The force Protective Security Manager (PSM) is responsible for reducing risks affecting systems and force data, and the force operates plans under the headings people, information and infrastructure which include technical and other forms of audit.

The PSM also has the function of force operational security manager and carries out specific work to ensure that organised crime investigations are protected against corrupt activity or other ways in which it might be compromised. Representatives from ACU and the force head of crime, together with the PSM, attend regular serious crime investigation co-ordination meetings.

In addition, further support and technical assistance is available through regional force co-operation. The force has also developed protocols and relationships with the NCA. In addition to other specialist software, the force has access to systems that enable comprehensive analysis of organised crime groups. The force is able to test its systems against unauthorised access and undertakes regular audits of computer systems.

The force ensures the effective security of systems, exhibits and case papers through a clear process, ensuring responsibility for compliance with management of police information (MOPI) principles. An information security policy is in place and is promoted through detailed guidance to staff.

A force records manager is in post. The work involves managing all disclosures, information storage, and the integrity of exhibits and property. The Protective Security Manager (PSM) also chairs the PIB which allows oversight of a wide range of force business and therefore provides opportunity to test or challenge security issues.

Intelligence

The force has already identified insufficient proactive capability to prevent and identify corruption. The present lack of analytical support for the ACU and the PSD to deal with the flow of intelligence that currently exists in relation to misconduct and corruption is an issue. The force has a delivery plan to identify and manage threats from corruption and unethical conduct, and there is evidence that some analysis has been conducted to identify trends and areas of risk.

The use of intelligence is managed in accordance with the relevant authorised professional practice (APP) and through use of appropriate grading methods. HMIC found evidence that this process has been used effectively during misconduct and corruption investigations.

There is a structured group which considers corruption risks and threats which reports directly to the deputy chief constable and provides oversight for investigations in progress. The process was documented, actions were allocated and progress reviewed. The force was also an active participant in regional anti-corruption group meetings.

The evidence from case reviews carried out during the inspection indicated that multiple suspects and multiple offences were being identified by a single suspect or occurrence which provides some evidence that the force is proactive in its examination of misconduct or corruption. Additionally there were processes in place for ensuring these outcomes are appropriately investigated and dealt with.

Capability

The PSD and the ACU have ready access to specialist assets when required, but only limited capacity to provide proactive investigation and preventive work. In practice this consists of training and awareness briefings from the ACU to staff and the ACU role in monitoring systems and other scrutiny functions.

The force has undertaken significant investigations into corrupt practice. A two-year investigation of a police officer involved the use of surveillance teams from two forces, support from the former serious and organised crime agency, the NCA serious crime teams within the region and also liaison with the Metropolitan Police Service ACU for tactical advice. Covert techniques and equipment were utilised and the individual was subsequently dismissed from the force.

The force manages the performance of the PSD and the ACU effectively. In addition, the PCC conducts informed and detailed external scrutiny as the basis for discussion and challenge with the chief constable. The process is documented and any work required is overseen through PIB.

The PSD performance is measured in terms of: timeliness; the quality of handling complaints; the quality of investigations; decision-making; outcomes delivered and the appeals process.

Both the head of the ACU and the head of the PSD confirmed there was ready access to the deputy chief constable and the other chief officers when required. This was evident in our review of the PSD cases.

The force has an effective and well considered process of communication with integrity and values consistently being reinforced. The corporate communications department uses various methods to ensure necessary information, including lessons learned or reminders about policy, are available and understood by staff.

Testing and the PSD case reviews carried out during the inspection confirmed that the force appropriately referred matters to the IPCC as required by statutory guidance and this is also scrutinised by OPCC.

Recommendations

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