



Inspecting policing
in the public interest

**Revisiting police
relationships:
progress report**

**City of London Police
December 2012**

About this review

In 2011, the Home Secretary asked Her Majesty's Inspectorate of Constabulary (HMIC) to look at "instances of undue influence, inappropriate contractual arrangements and other abuses of power in police relationships with the media and other parties". The resulting report, *Without Fear or Favour*, published in December 2011, found no evidence of endemic corruption in the Police Service. However, we did not issue a clean bill of health:

- Few forces provided any policy or guidance around appropriate relationships between the police and the media and others;
- There was a general lack of clarity around acceptance of gifts and hospitality; use of corporate credit cards; and second jobs for officers and staff, which could leave forces vulnerable to (at least the perception of) corruption; and
- Few forces and authorities had proactive and effective systems in place to identify, monitor and manage these issues.

We made several recommendations to help the service address these issues, and committed to revisiting forces in 2012 to track progress.

The revisit found that while forces have made some progress, particularly around putting in place processes and policies to manage threats to integrity, more needs to be done. The pace of change also needs to increase, not least to demonstrate to the public that the service is serious about managing integrity issues, which have retained a high media profile over the last year.

A thematic report, *Revisiting Police Relationships: A progress report* is available from www.hmic.gov.uk, and gives more information about what we found across England and Wales. The rest of this report focuses on what we found in the City of London.

A note on the scope of our review: Since our 2011 inspection, questions around police integrity and corruption have continued to be asked. For instance, the Leveson Inquiry has looked at relationships between officers and journalists (among other things), while investigations into senior officers and into the handling of historic investigations (such as the Hillsborough disaster) have received widespread media coverage. The findings in this report relate only to police relationships with the media and others, rather than broader issues of police integrity.

Findings for City of London

Since 2011, the City of London Police has conducted an integrity 'healthcheck', using the self-assessment checklist provided in HMIC's 2011 report, *Without Fear or Favour*, and introduced an Integrity Action Plan to manage the activity it is carrying out to address the issues raised. Several policies (including accepting gifts and hospitality, relationships with the media, and second jobs) have also been updated and circulated throughout the force via email and the intranet.

The Professional Standards Department (PSD) has conducted an organisation-wide assessment of threats from corruption and poor standards.

■ How are press relations handled, and information leaks investigated?

The force has updated its media policy. This outlines how relationships with the media should work, and stipulates that staff and officers must route requests from the media to their Communications Department. This is in line with the national guidance on relationships with the media produced by the Association of Chief Police Officers (ACPO). We found that staff were aware of these new rules. The force has invested in new software to log all official contact with the media, so that these relationships can be better managed.

Between September 2011 and May 2012, the force has investigated six instances of inappropriate disclosure to the media. Five of these were still ongoing at the time of our inspection.

The force removed access to social media sites from work computers and has recently produced a policy on how police officers and staff should behave on social networking sites (such as Twitter and Facebook). It has also circulated guidance on this via posters and e-mails. The policy covers the behaviour expected of staff when they are both at work and off duty, and the force monitors sites to check these standards are being met, actively encouraging staff to make 'inappropriate use' referrals to PSD. HMIC's independently commissioned research identified two cases of potentially inappropriate behaviour on Facebook or Twitter by officers and staff in City of London Police, which have been referred back to the force.

■ Is there more clarity around acceptance of gifts and hospitality, procurement, and second jobs?

In 2011 we found that the City of London Police was recording the **gifts and hospitality** accepted by officers and staff, but not what was declined, which made it more difficult to monitor and identify any problems. The force now publishes all declared gifts and hospitality on the website, and the Corporation checks the register regularly.

The Finance Department manages the use of all corporate credit and **procurement** cards and refers regular management information and any suspicious spending to the PSD. There is currently no monitoring in place to cross-reference contract and procurement registers with the gifts and hospitality register to ensure the integrity of the procurement process (e.g. to look out for instances where a company provides hospitality, and then is awarded a contract).

City of London Police's policy for seeking approval to have a **second job** requires all applications to be assessed and approved by PSD. This helps ensure there is consistency and scrutiny around the application process. All registered second jobs are subject to an annual review. Since September 2011 there have been no applications for second jobs.

How does the force identify, monitor and manage potential integrity issues?

The force has reported progress against the issues arising from its integrity healthcheck to the City of London Corporation Police Professional Standards and Complaints Sub Committee, which meets quarterly.

City of London Police has created a small Counter Corruption Unit to take a more proactive approach to tackling corruption, and is exploring the potential to increase the capacity of this team through collaboration with other forces. Data provided by the force to HMIC shows that there has been no change in the number of staff working in the anti-corruption unit since our 2011 inspection. The force instigated 15 investigations between September 2011 and May 2012 into the conduct of its officers and staff in relation to the areas covered by this report.

PSD staff give new recruits some information about the appropriate use of social media networks, but there has been limited training in integrity issues for those involved in the procurement of equipment and services. Changes to policy are communicated to staff via e-mail, intranet systems and some posters. Information about discipline cases (called 'lessons learnt') is also circulated, to highlight integrity-related issues. However, there is no mechanism to check that officers and staff have read and understood the messages and changes to policy.

Next steps

HMIC will continue to inspect on integrity issues as part of our existing programme of force inspections.

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