



Inspecting policing  
in the public interest

**Revisiting police  
relationships:  
progress report**

**Kent 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](http://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 Kent.

This time HMIC is publishing force-level reports. This is so the public and the new Police and Crime Commissioners (PCCs) can see how their force has progressed since 2011.

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 Kent

Since 2011 Kent Police, in conjunction with the former police authority, has carried out a self-assessment of how it measures up to the recommendations made in the 2011 HMIC report, *Without Fear or Favour*. A group chaired by the deputy chief constable meets regularly to ensure that action has been taken to address those areas that were identified as being in need of improvement. Several policies covering relationships with the media, gifts and hospitality, social media use and second jobs have been reviewed and updated. The force has adopted a number of innovative approaches to make staff aware of the policies. It plans to expand this further through the development of a computer-based training package.

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

The force's media policy outlines how relationships with the press should work. The policy makes it clear that any interaction with journalists should be managed by the force's media services department who maintain a record of all such contact. We found that staff understood these rules in accordance with ACPO guidance.

Between September 2011 and May 2012, the force has not investigated any instances of inappropriate disclosure to the media.

The force has reinforced its guidance to staff on how they should behave on social networking sites (such as Facebook and Twitter). This covers the standards of behaviour expected when staff are both at work and off duty. The force uses both manual scanning and specialist software to monitor whether these rules are being followed, or if information is being leaked online. The guidance has been communicated to staff in a range of ways, including a training video and a series of seminars for managers. We found that staff had a good understanding of the guidance. HMIC's independently commissioned research identified one case of potentially inappropriate behaviour on Facebook or Twitter by officers and staff in Kent Police, which has 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 Kent Police was recording **gifts and hospitality** received by officers and staff. However this was on multiple registers, held in different police stations, which made it more difficult to monitor and identify any potential problems. The force has updated its policy and now has a single electronic register covering the whole force. This makes it easier to ensure consistency across the force. The register is checked regularly by the force's Professional Standards Department (PSD).

People bidding for contracts with the force are required to declare any potential conflicts of interest. However, Kent Police currently only cross-references contract and **procurement** registers with the gifts and hospitality register to help ensure the integrity of the procurement process (e.g. by identifying any instances of a company providing hospitality, and then receiving a contract) if specific concerns have been identified.

Kent Police's policy for **second jobs** requires all requests to be assessed by the Human Resources department. This helps ensure consistency and scrutiny of the process. Checks are also made by the PSD on all applications. In 2011 we found that the force did not routinely review applications for second jobs once they had been approved. The force has now carried out a detailed review of all registered second jobs and has put a process in place to ensure that these are now reviewed annually. Since September 2011 there have been 63 applications for second jobs, all but one of which have been approved.

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

We found that the police authority had arrangements to monitor and govern integrity issues. The police authority was represented at the group which oversees progress on the issues raised in Without Fear or Favour. The recently elected PCC will need to be satisfied with the continued governance and reporting mechanisms for these issues.

Data provided by the force to HMIC shows that there has been a reduction in the number of staff working in the anti-corruption unit since our 2011 inspection. The force has recently agreed to establish a new team within the Kent and Essex serious crime directorate to assist in the prevention and investigation of corruption. The force instigated 60 investigations between September 2011 and May 2012 into the conduct of its officers and staff in relation to the areas covered by this report.

Changes to policy are communicated by email and on the intranet. The force has recently introduced a process to check that officers and staff have read these key policies. A series of integrity seminars have been held for managers and training courses on integrity have also been introduced for staff at all levels. The force is currently developing a computer-based training package for all staff covering a range of integrity issues.

## Next steps

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

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