

# **Her Majesty's Inspectorate of Constabulary**



## **Inspection of Metropolitan Police Service**

### **Professional Standards**

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# INSPECTION OF PROFESSIONAL STANDARDS 2005

## A - INTRODUCTION AND METHODOLOGY

### 1. Introduction

'Professional standards' within the policing context has evolved significantly in recent years, following the HMIC thematic 'Police Integrity' (1999), the establishment of an Association of Chief Police Officers (ACPO) Presidential Taskforce to tackle corruption and the introduction of the ACPO Professional Standards Committee. Since 2000, virtually every force in England and Wales has significantly expanded the activities of pre-existing Complaints and Discipline Departments to include an element addressing anti-corruption, including covert investigation. These larger units are generically known as Professional Standards Departments (PSDs).

The issue of complaints holds a unique importance for HMIC in that legislation<sup>1</sup> creates a responsibility on Her Majesty's Inspectors to 'keep themselves informed' as to the handling of complaints in forces. Traditionally, this has involved inspection of individual forces on a rolling programme. The advent of HMIC's annual Baseline Assessment (from 2003/04), the establishment of the Independent Police Complaints Commission (IPCC) in 2004, and a series of public inquiries have changed the professional standards landscape significantly. In view of this, HMIC decided to carry out a simultaneous programme of inspection of professional standards in all 43 English and Welsh forces to provide a comprehensive picture of current performance and identify any issues of national importance.

### 2. Inspection scope

While this national programme of inspection of professional standards has focused primarily on the operation of the PSDs, and their sub-sections, it has also examined issues of professional standards in the wider policing context, and therefore touched on other departments and areas of responsibility, for example Human Resources (HR). The core elements identified nationally for examination were:

#### **PSD**

- The umbrella department within which all professional standards activities are delivered, including the investigation of complaints and misconduct and proactive anti-corruption work.

#### **Complaints and misconduct unit**

- Responsible for reactive investigations into public complaints as well as internal conduct matters.

#### **Proactive unit**

- Responsible for the intelligence-led investigation of vulnerability to or allegations of corruption.

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<sup>1</sup> Section 15(1) of the Police Reform Act 2002

### **Intelligence cell**

- Responsible for:
  - Overall intelligence management
  - Analysis
  - Field Intelligence
  - Financial Investigation
  - Managing risks and grading threats

### **Handling of civil claims, security management and personnel vetting**

- Individuals or units responsible for identifying risks to the integrity of the police service manifested within civil actions, civil claims, employment tribunals, breaches of security and infiltration of the service by inappropriate personnel.

### **Handling 'Direction and Control' Complaints**

- Processes for handling complaints relating to:
  - Operational policing policies (where there is no issue of conduct)
  - Organisational decisions
  - General policing standards in the force
  - Operational management decisions (where there is no issue of conduct)

### **Impact of unsatisfactory performance and grievance**

- Relevant personnel within HR and operational departments, to establish that processes exist to identify any conduct issues or organisational lessons.

NB: The above list is not exhaustive nor does every force have each of these units or responsibilities as separate functions. The inspection sought to examine as many of the identified activities as are relevant to each force.

## **3. Methodology**

Since 2003/04, HMIC's core methodology for assessing force performance has been Baseline Assessment (BA), which consists of a self-assessment process supported by visits to forces for validation and quality assurance. BA assesses performance annually across 27<sup>2</sup> areas of policing via a framework of questions for each area. The mainstream BA process for 2004/05 was completed during spring 2005 and the results published in October 2005.

Professional Standards is one of the BA frameworks and would normally have been included in the mainstream BA activity. With the full programme of professional standards inspections scheduled for October and November 2005, however, the assessment of this framework was deferred to await their outcome.

The programme of inspections has been designed to:

- Provide a full inspection of professional standards in all England and Wales<sup>3</sup> forces;
- Gather evidence for BA reports and grading of professional standards in all forces; and
- Identify key issues, trends and good practice that may have implications for professional standards on a national basis.

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<sup>2</sup> Number of frameworks in the 2004/05 assessment

<sup>3</sup> Also including British Transport Police and Ministry of Defence Police and Guarding Agency

The standard format for each inspection has included:

- The completion of self assessment questionnaires by all forces;
- Examination of documents;
- Visits to forces with group and individual interviews;
- Consultation with key stakeholders; and
- Final reports with grade.

#### 4. BA grading

HMIC applies a qualitative grading to the inspection of professional standards. These grades are:

- Excellent
- Good
- Fair
- Poor

In allocating individual force grades, HMIC assesses all the available evidence and identifies how well the force matches an agreed set of Specific Grading Criteria. To ensure fairness and transparency in the grading process, HMIC worked with key partners in the Association of Police Authorities, IPCC, the Home Office and ACPO to develop and agree these Specific Grading Criteria for professional standards.

The criteria set out expectations for a Good force. Grades of Fair, Good and Excellent all represent acceptable performance levels but indicate the degree to which the force has met the grading criteria. An Excellent grade indicates 'benchmark' performance including significant implementation of good practice.

The full grading criteria are set out in HMIC's website at:  
[www.inspectorates.homeoffice.gov.uk](http://www.inspectorates.homeoffice.gov.uk).

The key elements appear under four headings, namely:

- **Intelligence** - *what a force knows about the health of professional standards*
  - **Prevention** - *how the force tries to improve and prevent the abuse of standards*
  - **Enforcement** - *its effectiveness in dealing with emerging problems*
  - **Capacity and Capability** – *having the resources and skills to address reactive and proactive challenges (including timely and proportionate response to lapses in professional standards)*
- The remainder of this report is set out under these headings, for ease of reference to the evidence presented.

## **B – FORCE REPORT**

### **Force Overview and Context**

The Metropolitan Police Service (MPS) is the largest and most complex police organisation in England and Wales. It is made up of 32 borough operational command units (BOCUs) sharing coterminous boundaries with the London boroughs. It is responsible for policing 620 square miles, with a resident population of over 7.3 million (3.2 million households) and also deals with an additional daily influx of approximately 5.5 million visitors and workers. The MPS is also one of the largest public sector organisations in the country with 31,073 full time equivalent police officers and 13,561 full time equivalent police staff and is configured to deliver a range of international, national and pan-London services, as well as local service delivery across the boroughs. In addition, the MPS is routinely required to respond to a range of major and critical incidents, as witnessed by the terrorist incidents in July this year, but is characterised by an ongoing commitment to provide reassurance to the people of London against the backdrop of a heightened terrorist threat.

The force headquarters is based at New Scotland Yard in central London. The last major restructuring of the MPS took place in April 2000 and involved the dissolution of the area structure and the move to borough-based policing. This was entirely consistent with the desire for locally accountable service delivery. The Commissioner has since instigated a 'Service Review' that seeks to further align resources with his widened vision that incorporates citizen focus and safer neighbourhoods whilst ensuring the MPS is best placed to deal with the terrorist threat. The Service Review began in February and has started to focus on some key changes that include the restructuring of Special Branch and S013 Anti-Terrorism Branch with directorates focusing on protection, whilst at the same time delivering a swift roll-out of neighbourhood policing, placing overall focus upon the citizen.

### **Professional Standards**

An assistant commissioner (AC) has overall responsibility for the MPS professional standards strategy and to deliver this heads a Directorate of Professional Standards (DPS) with a commander as deputy director (DD). The DPS is responsible for professional standards in the MPS, which includes investigations into police misconduct, public complaints, corruption and civil litigation. The DPS has a team-based approach to investigations and there is a higher level of supervision within the DPS than other commands.

There are five OCUs consisting of Anti-Corruption Command (ACC), Internal Investigations Command (IIC), Misconduct Civil Actions and Vetting Command (MCAV), Support Services and Accident Claims. The DPS has an authorised strength of 421 police officers and 260 police staff, the numbers being based upon a best value review in 2000, a full function evaluation in 2002/03 and later operational developments. At the time of the inspection the actual strength had fallen below these numbers, with 394 police officers and 237 police staff.

The ACC is led by a detective chief superintendent (DCS) and focuses upon anti-corruption investigations that are categorised into Levels 1, 2 and 3 with Level 3 being the most serious. Within the ACC there is an intelligence development group (IDG) and a comprehensive range of specialist operational and support functions

including financial investigation, hi-tech crime, a dedicated source unit, a witness protection unit, integrity testing and a review unit.

The IIC is also led by a DCS and deals with mandatory investigations, complaints and misconduct investigations, internal investigations, critical incidents and borough and OCU liaison. The IIC has two borough support units each led by a detective superintendent and each in turn having two area teams – responsible for NE, NW, SE and SW London respectively. Whilst most members of these teams are police investigators, the DPS has recently begun to introduce some investigators who are police staff members.

The IIC also has the support of a specialist investigation team (SIT) that provide a 24-hour response for dealing with deaths following police contact, critical incidents, fatal police accidents and in the last few month cases of racial discrimination. Teams are on call for one week supported by an on-call DPS superintendent. The SIT has a major incident room team that utilises HOLMES 2. A prevention and reduction team (PRT) has also been established within the SIT and is currently aimed at maximising lessons learnt from these investigations but is rapidly gaining a momentum that will place prevention at the heart of DPS activity. An internal investigations secretariat and performance analysis unit provide support to the operational functions within DPS.

The MCAV has a DCS as OCU commander supported by a detective superintendent who acts as deputy. The command has responsibility for some key areas of MPS business that include misconduct decision making, misconduct hearings and appeals, risk management and decision-making for civil actions, vetting and DPS policy development. To facilitate this work, the command has a vetting unit, misconduct unit, civil action unit, policy unit and an adverse information unit.

The accident claims branch is led by a senior member of police staff and takes direct responsibility for managing claims against the Commissioner, co-ordination of the MPS response, indemnities and insurance cover and liaison with the Metropolitan Police Authority (MPA) on insurance issues. This Branch identifies and orchestrates action on emerging trends focusing down to BOCU, team or even individual level in addition to thematic issues pan-London.

The DPS has the support of a business manager who is a senior police staff member and heads up a department that has expertise in finance, resource management, HR, IT support, performance management, training, communications and Freedom of Information Act enquiries. This department is central to all activity within the DPS and ensures that the support provided is tailored to the particular requirements of the Directorate.

The MPA has a professional standards and complaints committee (MPA PSCC) that oversees professional standards activity. The committee holds a bi-monthly meeting that is open to the public where performance, trends and any matters of concern are discussed. On a regular basis the AC and DD have formal and informal meetings with the chair and other members of the MPA PSCC. OCU commanders are often called to present evidence to the committee in relation to specific PSD matters. There is a culture and history of being able to communicate out of hours with MPA staff to discuss emerging or critical issues. MPA members are often part of the membership of PSD-related Gold groups and members of challenge panels. DPS staff work with MPA staff to develop improvements in the recording and investigation of complaints. Recent evidence of this is the direction and control protocol that has been developed.



The DPS is currently undergoing a significant period of change as part of the wider MPS Service Review and following a key Morris recommendation that stated that the Commissioner of the Metropolis should conduct a fundamental review of the DPS. As a consequence, a review team was formed by the AC and the DD.

The remit of that review team was to examine the current functions and activities of the DPS and through consultation propose a model for a new way of working. The overall aim is to provide an integrated DPS response to the Morris Inquiry, the Taylor report, the Ghaffur report and the Commission for Racial Equality (CRE) report in addition to taking into account the MPS Service Review and workforce modernisation programme. The review has focused upon restructuring and examining new ways of progressing core DPS activities.

The strategic aims, scope, organisation, milestones and benefits are set out in a project implementation document, which is widely published. The project board members include a cross-section of internal and external stakeholders and a challenge panel is being used that includes the IPCC. Phase 1 of the DPS review has been completed and an 'aspirational new way model' has been developed. The key features are:

- The separation of the primary responsibility for misconduct into minor and gross misconduct cases;
- The prime responsibility for minor misconduct and local resolution being allocated to BOCU/OCU allowing the DPS to deal with gross misconduct, critical incidents and corruption;
- Closer liaison and integration between the DPS and business groups, notably Territorial Policing (TP) and external partners; and
- The introduction of a DPS reception to act as a primary interface between the DPS, the rest of the organisation and external customers.

The model is now being developed further in Phase 2 of the DPS review through consultation with internal and external stakeholders, adapting this as appropriate and preparing a detailed specification with costings. Full implementation of the model will take some two years to complete but there are some aspects that are to progress during early 2006.

Consequently, this is a period of significant change for the MPS and the DPS and it is against that background that this assessment of professional standards has been conducted.

## GRADING: GOOD

### Findings

**Intelligence** - *what a force knows about the health of professional standards*

#### Strengths

- The DPS has a developed process for the National Intelligence Model (NIM), the products of which inform and drive the work of the ACC. The process was fully compliant with national NIM guidance and has resulted in some significant results. However, the other DPS OCUs are more reactive in nature with limited application of NIM principles to civil actions, complaints about conduct or direction and control complaints but any useful intelligence is fed back to the IDG for inclusion on the DPS intelligence databases.
- Within the ACC there is a clear intelligence cycle with effective processes in place to focus the resources through a weekly operations meeting. At this meeting, objectives are defined and cases reviewed and prioritised to ensure they meet the criteria of the control strategy. Once the intelligence is developed to an operational stage, enquiries are appropriately allocated. When additional resources are requested, such as a surveillance team, prioritisation is decided at a weekly tasking meeting. To facilitate this, the DPS has an IDG, which has an independent intelligence function.
- The ACC has an oversight meeting chaired by the DCS with attendance that includes an IPCC representative and the DPS diversity co-ordinator. The DD is also a regular attendee. This is an effective process for reviewing progress in cases and ensuring robust challenge, for example the need to continue surveillance authorities in the light of case developments. The ACC oversight meeting clearly has a thread running through it that ensures focus on capturing lessons learnt from investigations.
- There is an increasing amount of intelligence coming from staff in relation to corruption, which is evidence of a changing culture within the organisation.
- The MPS has a comprehensive strategic intelligence assessment (SIA) that is produced and presented to the professional standards strategic committee (PSSC) in addition to being forwarded to the National Criminal Intelligence Service. The identified issues inform the MPS professional standards strategy. This is a clear high-level statement of intent and aims to protect both organisational and staff integrity. Sound systems are in place to ensure the implementation of the strategy takes place. The SIA is reviewed on a regular basis. The control strategy is set and reviewed regularly by the strategic tasking and co-ordination group (STCG).
- There are formalised links and systems in place for the exchange of information with the wider intelligence community and other law enforcement agencies, essentially through the IDG. The DCS (ACC) is member of ACPO Counter-Corruption Advisory Group (ACCAG), for example, and has used this forum to discuss linked matters. Representatives of the ACC also attend regional practitioners meetings. There are close working relationships with other law

enforcement agencies.

- The ACC has been at the vanguard of developing a corruption referral protocol with the IPCC; this has been referred to ACCAG for consideration as the national model.
- The ACC proactive units employ some innovative tactical options during their investigations. The range of tactical options available includes integrity testing, which is intelligence led.
- The ACC dedicated source unit (DSU) has good linkages with other such units in the MPS and proved to be an effective unit with skilled and knowledgeable staff and leadership. The physical security of the source unit was good.
- The DSU is subject to regular intrusive supervision by the AC as authorising officer who is independent of the investigation process. The DPS has a direct link with the corporate central source management unit to exchange information which requires action. This unit is overseer of source handling across the MPS.
- Regulation of Investigatory Powers Act (RIPA) intrusive and directed surveillance authorities are the responsibility of DSUs and DCS (ACC). The ACC has a dedicated RIPA office that is under the command of the DSU (IDG). The Office of Surveillance Commissioners has recently inspected this DPS function and reported that the systems and process adopted are of a very high standard. A robust review process has been adopted by the unit for reviewing covert human intelligence sources. The documentation regarding risk assessments was comprehensive and well maintained.
- The DPS ACC has a hi-tech crime unit with experienced and highly skilled staff that aims to keep the MPS at the forefront of emerging technology by providing expert advice about the recovery of evidence, robust intrusive yet transparent supervision of all MPS systems and to maximise learning opportunities.
- Both the witness protection and the surveillance units are also professionally run with committed and skilled staff and can be deployed on the full range of DPS activities. Surveillance teams complete feedback forms that enable operational staff to highlight areas of concern and good practice after each operation.

### **Areas for improvement**

- The new model for the DPS will separate intelligence and enforcement whilst placing both reactive and proactive resources within the enforcement command. There is a sound basis for this change, which will ensure DPS activity is intelligence based with a strong preventative agenda. However, this will have a significant impact on the ACC, which has proved to be a beacon of excellence. In moving to the new model, the MPS should have cognisance that whilst improving the overall focus of the DPS the experience and lessons learnt within the ACC are maximised. A key issue will be to ensure that there is effective management, consultation and communication with staff, particularly those from ACC, as the changes are implemented.

## RECOMMENDATION 1

**Her Majesty's Inspector recommends that when implementing the new professional standards model the MPS should fully consider the experience and lessons learnt within ACC. A key issue will be for the MPS to be satisfied it has effective management, consultation and communication, particularly with ACC staff.**

- There is limited application of NIM principles to civil actions, complaints about conduct and direction and control complaints. This has resulted in a consequent lack of prioritisation and focus in these areas. It is recognised that work is in progress to ensure all DPS activity is intelligence led and that there is to be an alignment of processes and structures as part of the DPS review to ensure that this is achieved. This work will be a critical success factor as the MPS progresses the new model for DPS.
- On occasions RIPA applications have been authorised by superintendents for their own operations teams when the default authorisers were not available. This has the potential to cause issues regarding the lack of independence and the practice, however well intended, should now cease.

**Prevention** - *how the force tries to improve and prevent the abuse of standards*

### **Strengths**

- The AC is a member of the MPS management board and therefore has direct influence on the decision-making process. This ensures DPS activity is central to the issues being considered by the MPS.
- There is clear evidence that chief officers drive forward the strategy to both set and sustain professional standards. The DPS is led by a director of AC rank and a DD of commander rank. The director chairs the PSSC and the command team meeting. Due to his lead role in the MPS Service Review and recent terrorist incidents in London, the AC has only recently assumed the PSSC chair's role. The DD chairs the DPS STCG, vetting board and Gold groups and attends ACC oversight meetings in addition to some management meetings at covert sites.
- The MPS PSSC drives the professional standards strategy that sets out the responsibility for initiating, developing, agreeing, implementing and reviewing MPS policies that deal with professional standards matters. All business groups together with staff associations, unions and support groups are represented on the PSSC, which meets quarterly. Representatives from personnel and training portfolios ensure training and awareness are central to the progression of professional standards strategy.
- The MPS ensures active engagement in the development of professional standards policy within England and Wales through senior managers having membership of the ACPO professional standards committee, ACCAG, National Complaints and Discipline Group and the IPCC advisory group. Senior DPS managers attend these groups and also co-ordinate the annual 'Professional Standards in Policing Conference', which is attended by command team

members.

- The DCS of DPS IIC was a member of the IPCC/Home Office working party which developed the IPCC statutory guidance and fully utilised this contact to promulgate learning within the organisation.
- Regular performance (and other informal) visits are conducted by the DD on all of the five OCUs contained within the DPS and there is ACPO oversight of the weekly TCG. Additionally, the DD chairs weekly operational and management meetings with DPS OCU commanders. The DPS has performance indicators and targets for professional standards activity, including the management and timeliness of investigations that are monitored at monthly command team performance meetings.
- The MPS has ensured there are a number of channels for making complaints including a DPS reserve desk that operates between 0800 and 2200 Monday to Friday with additional 24-hour support by on-call staff. The desk received 3,000 calls in the first 10 months.
- There is a facility, through use of language line, for the DPS reserve desk and officers on BOCUs that provides accessibility to the complaints process for members of the public who do not speak English. Leaflets have recently been designed that are available to the public explaining the complaint processes in various languages, with those leaflets available at third party sites. These are also due to be issued to staff associations, independent advisory group (IAG) members, libraries and citizens advice bureaux through BOCU distribution. Complaints may also be made directly to the DPS, through the MPS internet site or at a separate e-mail address 'complaints@met.police.uk'. Multi-language posters explaining the complaints procedure are due to be placed outside police buildings.
- The MPS has a confidential reporting line for staff entitled 'Right Line' that was introduced in December 1996 and provides a facility for reporting wrongdoing by all staff. Outside of office hours a facility now exists that will allow the on-call officer to access urgent messages and take appropriate action. The process is set out in the MPS 'reporting wrongdoing' policy, which explains the roles and responsibilities of those involved. On the confidential reporting line 76 out of 114 calls were prepared to leave their contact details – a sign of growing confidence in the scheme. Staff associations and support groups reported that generally they have sufficient confidence to raise their concerns.
- The DPS has established discussion forums for all staff, places articles in a DPS newsletter and is working to ensure that more written DPS-related notices are placed on the intranet. The DPS has a communications improvement team, which meets each month responsible for implementing the DPS communications strategy. On behalf of the team the communications manager gives regular updates to senior management teams.
- The MPS has a comprehensive risk management system, which at its heart has an intelligence cell that provides products on civil actions, complaint records, intelligence, taint and service confidence, employment tribunals and claims management. A monthly Diamond risk management committee is chaired by the DD and has access to IAG members on difficult or contentious issues. This is supported by a Silver risk management group that considers all the matters on the high profile list, ensures action and appoints Gold in accordance with the

MPS critical incident management process. A Bronze management group meets monthly to act as the filter to ensure high profile cases are identified and risk management applied. There is DPS engagement at each stage of the process and this ensures early intervention.

- The DPS has linked the issues raised in the SIA, business risk management, corporate planning requirements and MPS professional standards strategy into a single planning document called the DPS planning and risk register (PRR) that is used to drive activity and development. These risk assessments include not only MPS generic issues, but also a programme of in-depth examinations of risk and vulnerabilities at OCU level (including the analysis of data from public complaints and confidential internal reporting of wrongdoing systems). These facts can then be shared at inclusion meetings with local OCU commanders as part of an OCU profiling process and a joint action plan is then created to tackle and mitigate the identified problems.
- Security of related assets is managed under the MPS security code (METSEC) programme. This is an effective programme. For example, the SIA indicates that information systems leakage is a growth problem. The response is contained under Strand 2 of the professional standards strategy and Section 2 of the PRR. The tactics are driven by the information systems security group with DPS involvement. Part of the response by the DPS has been the formation of a hi-tech unit, its remit including both proactive and reactive work on this issue.
- The OCU for accident claims, in common with all DPS OCUs, has a risk register and the process, which has been in place now for a year, is well embedded. A planning meeting attended by DPS heads and which is linked to the SIA process identifies issues that are placed on the risk register complete with an action plan, lead officer and subject to a quarterly review. This is an open process focused on improving organisational learning and is available to all staff in the MPS on the DPS website.
- The number of civil actions has reduced significantly over recent years with compensation and legal costs also reduced. This has been achieved through a concerted programme of education that included the development of a training package for officers required to present evidence in a civil court.
- The DPS has a PRT led by a detective chief inspector- the origins arising from orchestrating the response to recommendations following investigations into deaths after police contact. The actions are all recorded on HOLMES and allocated to the appropriate ACPO lead for action and response. A rigorous progress-chasing process is reported as occurring. The opportunity to extend this scheme further has been recognised with a second database on the AWARE system (Excel) being used to record and progress chase actions and learning on complaint investigations. The extension of the scheme is in its early days and so far this year there have been 34 recommendations recorded. Since April 2005 the investigating officer has been required to record and action corporate learning identified by the IPCC. The team is beginning to evolve systems to identify trends in conjunction with the performance analysis unit. A constant consideration is that they remain within the corporate memory base to check progress and ensure development.
- The prevention activities of the PRT are currently centred upon custody. These include conducting open seminars aimed at preventing deaths in custody (open to MPS and partners). Seven have been conducted since 2004 with the most

recent being in May. Custody staff are required to attend and where this has not been the case focused seminars/training on the OCU have taken place. A second project has been the introduction of defibrillators in custody blocks. Three pilot sites are operating in Peckham, Camden and Southhall. The project reports in September next year. Other projects include safety equipment as well as a 'fakers' poster campaign for custody/police briefing rooms. The latter project is in collaboration with the British Transport Police and City of London Police.

- The PRT promotes integrity and ethical standards through training inputs to probationers, custody staff, OCU staff and seminars. Borough single points of contact (SPOCs) also provide training tailored to BOCU needs and ACC on crime academy courses. MCAV promotes standards through borough-based training and for newly promoted superintendents participating in misconduct hearings.
- Learning opportunities are identified by the civil litigation unit and fed back to the OCU. One example of organisational learning achieved by this process is the 'presenting evidence at court' video now shown to all officers who are about to give evidence at civil litigation hearings, the issue having been identified through officers' evidence not being delivered effectively.
- Integrity and ethical standards are promoted through a positive internal media campaign to publicise emerging issues and highlight arrest/conviction for corruption-related matters. The DPS has branded 'integrity is non-negotiable' and this logo features on DPS documents and merchandise.
- OCU commanders have regular cluster meetings chaired by their commander and were able to give examples of emerging DPS issues being fed back to them through this medium and presentations regarding professional standards matters on one occasion.
- The ACC is in the process of undertaking its first customer satisfaction survey. The results of the British Crime Survey, public attitude surveys and internal staff consultation are fed into business planning processes.
- The DPS introduced a post of performance and learning manager when it had responsibility for employment tribunal management. This has now been transferred and is based within the MPS HR Directorate. The postholder ascertains learning outcomes from employment tribunals following reviews with the solicitor and caseworkers. These are directed to HR departments and TP, or other directorates with appropriate responsibility, for policy formulation and action. The postholder completes regular updates on learning outcomes and other HR developments, which are detailed in a monthly newsletter and posted on the HR website.
- MPS vetting policy closely mirrors ACPO guidance on vetting and representatives sit on the ACPO vetting working group. The chair of the ACPO working group on vetting has recently been taken up by a DPS chief superintendent. The force is actively engaged in further improving the vetting processes. The vetting unit is devising manuals of guidance for the practitioner on the use of the vetting database known as 'Warrantor'. The MPS is one of only a few forces in England and Wales using this database. Vetting persons of concern is an integral part of the MPS SIA.
- The MPS has carried out analysis of proportionality in the vetting function, with results indicating that the service is proportionate.

- Substance misuse was identified in the SIA and the MPS is taking a key role in the development of policy and procedures. The Home Office set up the Police Advisory Board for England and Wales working group and invited MPS representation. The DPS set up a project to prepare for the implementation of compulsory powers two years ago. In 2000 the MPS published a substance misuse policy, which was revised in 2004, and in that same year published an interim substance misuse policy. The testing of MPS recruits commenced in April 2004 and standard operating procedures have been prepared, following consultation, for testing forthwith now that legislation has been enacted. A substance misuse testing unit is to be considered under the line command of HR.
- Corporate policy in respect of business interests has been published and is the responsibility of the HR Directorate. It includes clear provision for review. DPS has a business interest register, which is run in line with the corporate policy.
- A bi-monthly borough commanders' meeting has been utilised to cascade learning following emerging trends in relation to incivility where those present worked through case studies and came up with possible reduction strategies.
- The MPS has embarked on a programme of 'mystery shopping' to test responses by staff to complainants. There have been two integrity testing programmes to date - the learning having been taken forward through a TP action plan. The results of this work, known as 'Anarcharsis' 1 and 2, revealed significant weaknesses, which are the subject of a TP/DPS action plan headed by a TP deputy assistant commissioner. When deemed appropriate, Anarcharsis 3 will determine the effectiveness of remedial work.
- The DPS has a performance analysis unit that produces detailed performance information. This analysis is subject to monitoring at DPS command team and senior management team meetings. The MPS produces a borough support management information pack that is sent to all OCU commanders. It is used by the MPA PSD committee but is not utilised as part of the NIM process for the DPS. However, the DPS IIC has used this to identify OCUs needing support prior to orchestrating an action plan to achieve performance improvement.
- DPS IIC has commissioned research by Cambridge University in respect of both internal and external disproportionality and emerging findings should be available at the end of the calendar year.
- The recent Morris, Taylor, CRE and Ghaffur reports have been fully considered in relation to professional standards matters. The MPA has agreed desired outcomes, sections of which have been allocated to DPS members for action (reporting back to the DD) and are being jointly considered within the current review of the DPS.

### **Areas for improvement**

- There is prevention activity within the PSD but this is tackled departmentally without a holistic approach. There is currently no effective process to ensure that individual learning is traced through the organisation and appropriate action taken other than the actions currently monitored through the PRT. The DPS review aims to resolve this by establishing a new prevention command. The structure will be in place by April 2006 but it will take longer for the experience to be gained to make the command effective. Integrity testing is to be brought in alongside



prevention.

- The DPS may wish to consider as part of the changing culture and as part of the prevention strategy the more active marketing of the cases where the DPS has exonerated officers and not just the ones that highlight the prosecutions.
- There is acknowledged disproportionality in service delivery on key areas for the MPS professional standards performance but the force clearly seeks to fully understand the issues and achieve resolution. To progress this, Cambridge University has been commissioned to analyse the disproportionality that has been identified in both internal and external MPS service delivery. The corporate inspection department has also been tasked to scope the issue with a view to internal inspection activity. This is of key strategic concern to the MPS with progress closely scrutinised within the PSSC.
- Some representative groups hold strong views and consider there to be a lack of proportionality and are not at all convinced that the MPS is taking positive action. In order for there to be an open and transparent process, the MPS should consider working even more closely with the IPCC and MPA to ensure independent oversight of progress on proportionality. This should be the case whether the review is of individual cases or when assessing the overall proportionality of service delivery in order to provide reassurance to these groups and to the wider community.

#### RECOMMENDATION 2

**Her Majesty's Inspector recommends that in order for there to be an open and transparent process, the MPS should consider working even more closely with the IPCC and MPA. This is to ensure independent oversight of progress on proportionality whilst work is ongoing to fully understand the issues.**

- Whilst the MPS endeavours to encourage confidential reporting it has yet to introduce an entirely external and independent confidential reporting line as has been successfully introduced in many other forces.

#### RECOMMENDATION 3

**Her Majesty's Inspector recommends that the MPS should consider reviewing the confidential reporting line and the introduction of an entirely external and independent confidential line in order to strengthen confidence in the reporting system.**

- The MPS has created a force liaison unit to act as a single focus for transferee checks in recognition of existing difficulties in securing vetting checks for and from other forces. Individuals of concern are flagged on the Warrantor database as there is no other repository for such intelligence. There is no access to the CLUE 2 IT system for this purpose. Steps should be taken to ensure that there are no intelligence gaps.

- The claims department has the capacity to identify emerging trends and issues focusing to borough (OCU), team or even individuals. This capacity also allows for thematic issues to be identified within the MPS. There is an appetite within the unit to be more proactive and there is evidence that two road shows have been conducted, visiting Ealing and Lambeth, where issues had been identified. This proactivity should be formalised and greater emphasis should be placed on the ability of the unit to address organisational learning outcomes identified in claims prevention and damage limitation.
- There is currently little contact between the claims department and the OCU DPS SPOCs. There is an opportunity to develop improved lines of regular contact in order to improve communication and linkage, maximise learning opportunities and take early intervention to limit liability or address emerging issues or trends.
- The Warrantor database is used to manage vetting checks and links in with other DPS systems but is not readily accessible to HR or other forces. Force intelligence systems can take up to half a day to conduct a search for vetting just one individual. The existence of residential criteria is a constant issue for conducting vetting checks. Vetting has become more problematic due to employers being unwilling to disclose issues. There is therefore a range of issues to be tackled by the MPS in this important business area.
- The Force is challenging the guidance from the Home Office (Circular 23/05) for the taking of fingerprints/DNA for recruits and is currently proposing full searches of all fingerprint and DNA databases.

## **Enforcement** – *the force's effectiveness in dealing with emerging problems*

### **Strengths**

- Although both the AC and DD are relatively new to their DPS responsibilities, there is clear evidence of their strategic leadership providing direction for professional standards. This is exemplified in their roles as programme director and project manager respectively for the fundamental review of professional standards that is aimed at achieving continuing improvement. The DD also ensures personal contact with the IPCC, MPA, and MPS support and representative groups.
- Staff have reported that there are good lines of communication with senior PSD management and that they are accessible. In particular, the DD has made significant efforts to ensure regular visits to PSD sites to discuss ongoing issues with staff members.
- The post of early intervention officer has been introduced at the DPS borough support unit at Norbury (SE) as part of a pilot scheme. This individual scans incoming complaints and establishes those suitable for fast tracking and early intervention. This process has resulted in the speedy local resolution of a significant number of complaints; this fits well with principles in the IPCC guidance. Whilst it is too early to fully evaluate the results, early indications are promising.
- A misconduct investigation guide has been developed providing comprehensive policy guidance to all staff. It also takes account of the draft IPCC guidance and the principles of Lancet and Morris in respect of timeliness, appropriateness and

proportionality. It gives clear guidance on misconduct regulations, cross-border complaints and staff attracting multiple complaints.

- The DPS strives to achieve a 120-day standard for completion of both public complaints and conduct matters and is currently achieving 101 days to complete public complaints and 108 days for conduct matters. There is a comprehensive performance management framework built around two key reports: Investigating Officer Workload Analysis and Investigating Officer Throughput Analysis. These documents feed the monthly IIC performance bulletin and DPS monthly management report. Every two months they are then reported to the MPA PSCC. These use the date the complaint is 'received in force' rather than the 'date recorded' on the system. The IPCC has adopted this method in its statutory guidance. The ACC, MCAV and civil claims all have similar timeliness objectives and review structures to ensure that cases are dealt with in a reasonable timescale.
- Misconduct cases are reviewed by a case manager who makes a recommendation. A DPS DCS then reviews the file and recommendation as to disposal. This provides consistency and utilises knowledge of comparable cases. Throughout this process the case manager, in line with IPCC guidance, provides written updates to the complainant and officers subject to complaint at a frequency of 28 days. Awareness of these procedures is further highlighted by training from the borough support SPOCs, who also monitor complainant feedback.
- The MPS has implemented the Lancet principles in accordance with the IPCC/ACPO agreement. MPA, Crown Prosecution Service (CPS) and IPCC involvement also provides checks and balances to the process of deciding whether or not to proceed with criminal or disciplinary cases.
- The MPS operates an officer of concern programme to facilitate management intervention through the DPS IIC. The programme applies to officers who, in the previous 12 months, had three or more complaints originating from the public or internally. Comprehensive management information reports are compiled which provide a breakdown of performance across categories of complaint and officer role with ongoing scrutiny of the reports leading to appropriate action. This enables managers to monitor and develop individuals and make early interventions.
- The MPS has a suspension policy with standard operating procedures that is being reviewed in close liaison with the MPA. These procedures give line managers guidance as to their role in providing support to those suspended. The AC or DD regularly review cases where officers are suspended and ensure that line managers are involved in the decision-making process.
- As part of any professional standards investigation, the welfare of those involved is a mandatory consideration and staff associations are encouraged to support their members; in addition, in the more serious cases line managers are reminded of their welfare responsibilities. A suspension support unit is currently being established within HR, which aims to provide support that is equal across the service. Placing ownership within HR removes it from the investigative process.

- The HR Directorate has overall responsibility for police staff investigations. There is clear evidence that there are effective links between the DPS and HR departments.
- OCU commanders have confidence in the MPS central police staff discipline advice unit. This advice and guidance is viewed as invariably accurate, well informed and appropriate, ensuring corporacy in sanctions and preventing possible subsequent employment tribunal issues. There is clear policy that OCU command must contact the desk in every case where there is a possibility that staff may be dismissed. The unit reviews all completed police staff files to ensure the case for gross misconduct is made before hearings take place.
- Processes are in place to identify conduct matters stemming from civil actions, employment tribunals and fairness at work procedure. Flow charts have been produced that take into account IPCC guidance and assist decision making for determining, recording and investigating conduct matters. All potential conduct matters are reviewed by the civil actions investigation unit of MCAV and those deemed necessary to record are referred to DPS IIC for recording and further investigation. This has also proved to be a good system for identifying themes from civil cases
- Discipline notices are now served at DPS premises whereas previously they were sent to BOCUs for service, resulting in delays. There is evidence that the current system is more timely and ensures the certainty of service. It also enables receiving officers to familiarise themselves personally with the officer who will be conducting the investigation, aimed at resulting in a better dialogue.
- Aims and objectives for an investigation are consistently agreed at the very early stages of an investigation conducted by the DPS.
- There are plans to introduce a local investigator on Croydon BOCU to manage and investigate low level complaints. This may be a way of alleviating work pressures and concerns voiced by the BOCU commanders.
- The MPA has recently approved the expenditure of up to £50 as ex-gratia payment to complainants to assist in achieving more local resolutions.
- The MPS has recently appointed a DPS forensic manager, who is a member of the OCU senior management team, advises staff on forensic issues and oversees forensic accounting. This ensures that the DPS fully considers forensic opportunities during the course of investigations.
- To ensure a consistent, corporate and timely response, all complex internal allegations of discrimination in relation to race, religion, sexual orientation, age, disability and gender are now investigated by IIC specialist investigations whose staff have expertise in critical incident investigation.
- The local CPS has set up a police misconduct unit, which has assisted with communication and partnership working.
- The DPS borough support unit at Norbury has developed a new suite of letters to complainants utilising the services of an external company who specialise in plain English. This has been given the Charter Mark seal of approval.

- The MPS sends a letter to police officers and staff who are facing potential dismissal as soon as this is being actively considered. The letter points out that this is a possible outcome of the internal investigation and hearing and invites the individual to consider their position. There have been a significant number of early resignations as a result. The alternative has been for staff to await the outcome of sometimes lengthy investigations and costly hearings. This is seen as a cost efficient and proportionate method of resolving these issues. Of the 55 officers given this option this year, 45 have accepted.
- A policy on sanctions guidelines was published in MPS Notices in 2004. In addition, a booklet was published with guidelines and distributed to all superintendents and above. The actual sanction in each case is published internally by the MPS. Misconduct panels decision-making processes are quality assured through dip-sampling by the MPA and DD.
- The DPS and the MPA have developed 'case management and dip sampling' protocols in order to increase public confidence in the complaints system and to ensure effective delivery of the MPA's oversight responsibilities. IAG members are asked to assist in complaint/misconduct issues at Gold group level and actively participate in DPS seminars and training. However, the DPS does not have its own dedicated IAG at this time.
- For all critical incidents investigated by the DPS, the senior investigating officer completes a community impact assessment with the BOCU commander, to ensure concerns are identified and can then be addressed. During and at the conclusion of all investigations, complainants are advised of the complaints and appeals processes. The DPS has specific OCU SPOC arrangements to ensure that DPS customers are able to discuss issues of concern with an individual who has knowledge of the OCU profile.
- Following adverse finding at criminal trial, civil trial, discipline hearing or other judicial hearing, officers concerned are considered within the adverse findings and taint standard operating procedures. Where the service considers that it can no longer have absolute confidence in an individual's integrity, the service confidence procedure can be instigated. The MPS do not have a 'compromise' database but systems are in place to investigate any operational compromises. All appropriate parties including legal representatives, HR Directorate and the officer subject to the process are involved. Vetting appeals have also been made subject to this process.
- Although overall numbers remain relatively low, the tactic of 'service confidence' has not always been utilised for appropriate cases. This was recognised by the MPS and the tactic is now reserved for more serious cases rather than used to resolve difficult management issues.
- The DPS has a policy that clearly sets out its role following the police use of firearms in order to ensure there is clarity for the organisation and officers regarding the investigative requirements and has promulgated this through meetings and training.
- Mediation is used extensively and has been very successful. This allows for cases to be settled without the need to go to court using a legally trained mediator. It also increases the chance of acknowledging staff concerns or reaching public satisfaction.

- All levels of IPCC personnel are engaged in the ongoing DPS training and development programme to mutual benefit.
- The MPS has a good relationship with the MPA. Agreed protocols exist for this oversight role and there is willingness on the part of the MPS to support the MPA by offering support to newer members. The MPA can have oversight of anti-corruption files and it is directly involved in the review processes for the DPS. There are also good relations between the MPA and DPS and it is particularly noted that the MPS leadership is encouraging openness and transparency. The MPA chair of PSSC meets the AC and commander regularly, including a monthly informal oversight meeting.
- Challenge panels incorporating members of the IAG are engaged in the current review of the DPS and this includes members of the public. Link members are providing inputs into committees.

### **Areas for improvement**

- The reorganisation of DPS will place more onus for complaints to be dealt with at borough level as the MPS enhances citizen focus. To do this borough staff must have a clear understanding of the issues, have suitable toolkits and have appropriate contact points for reference. The DPS review team has recently presented and received approval for an 'aspirational and interim model' that recognises the need for a phased programme. This approach is supported, as there were concerns expressed by key staff that, although they fully accepted the concept, implementation required appropriate training and resource allocation.
- The MPS has a policy in place for boroughs to refer cases of discrimination to the DPS SIT. At the same time boroughs are being required to ensure local action on local issues. The current policy is causing uncertainty as relatively minor matters are being referred for DPS SIT investigation and consequently being returned for local action. This has the potential to cause delays in resolving the issue at source and should be reviewed.

### **RECOMMENDATION 4**

**Her Majesty's Inspector recommends that the MPS should consider reviewing the process for the investigation of discrimination cases to ensure investigations are conducted at the earliest opportunity and that there is clarity regarding investigative responsibilities.**

- The officers tasked with the serious discrimination cases have sound investigative experience. All detective inspectors and above receive specialist training in discrimination jointly with the IPCC, IAG and Staff Association representatives. However, no additional training is provided for officers of other ranks to assist them to investigate complex discrimination cases.
- There is variable use and uptake of the local resolution policy. It would appear many supervisors lack the confidence to effectively conduct this process. There is an apparent training need and also a need for greater consistency in local management emphasis on this means of timely complaint resolution. Between 1 April 2005 and 31 July 2005 variations range from Redbridge BOCU that

conducted 15% of local resolutions to Kingston upon Thames BOCU where 81% were so resolved.

#### RECOMMENDATION 5

**Her Majesty's Inspector recommends that the MPS should review the reasons for the variable uptake and use of the local resolution policy and take appropriate action to deliver a greater level of consistency in decision making.**

- The DPS has single points of contact within BOCUs but these contacts are at differing management levels and reflect the degree of local emphasis by the quality of the linkage and their contribution to the process. A more consistent approach with clear terms of reference will help ensure effective communication regarding investigations.
- When an officer is cautioned the MPS sanction policy allows the hearing to apply a disproportionate financial penalty through the officer losing additional payments such as the special priority payment. The issue is one that 'friends' are being advised to raise to panels in their summing up, asking panels to consider the implications and offer 'no further action' when in fact a 'caution' might be more appropriate. This should be reviewed.
- Despite guidance contained in the MPS sanction guidelines, concern was expressed amongst staff regarding the consistency of decision making on sanctions. Police misconduct boards comprise senior MPS police officers with appeals heard by an AC, all of whom have received the requisite training. Any trained commander or deputy assistant commissioner, apart from those with DPS responsibilities, takes on these responsibilities; this has the benefit of offering a wide range of experience but makes it harder for the MPS to achieve consistency. This manifests itself for example in drink driving sanctions ranging from dismissal to fines of five days pay on appeal but is not restricted to that type of offence. There is no effective oversight of these sanctions to ensure the MPS is delivering a consistent message to staff, resulting in uncertainty and potential loss of confidence in the system.

#### RECOMMENDATION 6

**Her Majesty's Inspector recommends that the MPS should be satisfied that the sanctions being applied following misconduct boards and subsequent appeals are consistent and that there is effective oversight of these sanctions.**

- The public face of the relationship between the MPS and the IPCC has been the response to the Stockwell incident, which is being separately scrutinised. In their day to day interaction and strategic planning, both parties are reporting openness and transparency growing but there remain some issues in need of attention. For example, there are differing views on the causes of some delays in the system, quality and proportionality of investigations that will require resolution. On a broader front, there are differing messages about complaint numbers. The IPCC considers that a rising number of complaints are healthy for an organisation, indicating trust and openness, but the MPS view differs. The MPS considers that

when all avenues have been explored to facilitate complaints an effective prevention strategy will reduce overall numbers. This reflects different views about whether the numbers of complaints have peaked and now represent actual levels of dissatisfaction. The IPCC still considers that the MPS has work to do in order to move away from a blame culture but it is clear that in the DPS review the MPS is striving to improve as a learning organisation. The IPCC has membership of the challenge group for the DPS review and with regular contact with DPS management offers the opportunity for the MPS to resolve these issues. However, a key issue for the IPCC is that in its view there is no single 'relationship' between the MPS and IPCC. This is partly a function of the size of the MPS and the division of DPS into borough support units.

- The IPCC has four commissioners for the MPS with regional responsibility (NW, NE, SE, and SW). There are significant differences in the number of cases successful at appeal, including recording complaints, complaint outcomes and against the local resolution process from the IPCC within the four regional IPCC commissioners' areas. The MPS should assess the reasons for this to ensure that consistent investigative procedures and policies are being applied. The IPCC now has a single co-ordinator to deal with MPS practice issues and the DPS is encouraged to consider the identification of a similar role.
- Systems for managing complaints that involve any element of racism are currently referred to the IPCC. The IPCC considers more should be dealt with locally, as the criteria for referral are clearly established in regulations.
- The borough support management information pack is not fully utilised by the DPS. As the DPS develops the management information pack further and progresses towards an effective NIM process, this should be utilised as another perspective to assist tasking considerations.
- The MPS, as with many other forces, does not make efficient use of unsatisfactory performance procedures. For the procedure to be imposed, there must be a regime in place where performance development reviews (PDRs) are completed, issues are pointed out to staff in advance and action plans completed. Whilst considerable progress has been made in this regard, PDRs are not always completed effectively and there is a tendency for supervisors to opt for disciplinary action instead. There is a need to ensure that staff supervisors fully understand the processes and that there is adequate support provision. There is also some evidence of a lack of confidence by some supervisors.
- The concerns over the possible increase in recorded complaints have not been realised. The actual rise has been in the order of 316 extra complaints. There is some evidence of enquiry staff not referring complaints for action unless they are deemed serious and of senior BOCU officers not dealing with the process effectively. This subjective test may well be resulting in lower recording rates. This has been triangulated not only by HMIC staff but also the MPS own mystery shopper operation, Anarcharsis.
- The MPS has experienced difficulty in securing the services of ACPO ranks from other forces during recent professional standards cases.
- There is no specific criterion that sets out the decision-making process and considerations prior to convening a discipline board, such as the perceived seriousness, impact or force reputation.



- The MPA PSCC has produced, discussed and agreed a paper covering key Morris recommendations as they relate to the committee in its oversight role. The MPA paper and recommendations were supported by the MPS. A professional standards officer has been appointed and expertise has been brought to bear from elsewhere in the MPA in order to begin the dip-sampling process. The MPA recognises the importance of this function and is continuing to develop this oversight responsibility, although there is recognition that a robust programme has yet to be fully introduced.
- The DPS has a good working relationship with the CPS, although it considers that there are some significant delays in CPS case management. There is no designated CPS liaison representative for the DPS, but there is regular liaison at a senior level through meetings held between ACC and the recently established CPS special crime division. The boroughs have such a point of contact and derive benefit by having clear lines of communication.
- The DPS is able to record the fact that a complainant has invoked the IPCC appeal process but not the outcome of the appeal. The inability to record this additional detail has been recognised and is being addressed in a new complaints and discipline system called Tribune.

**Capacity and Capability** – *having the resources and skills available to address the reactive and proactive challenge and providing a timely and proportionate response to lapses in professional standards*

### **Strengths**

- The DPS is the largest professional standards department for policing within England and Wales and has focused resources that are sufficient to handle the range of both proactive and reactive investigations. There is significant engagement by senior managers in helping the police service to achieve realistic solutions to problems, often based on the MPS experience.
- The ACC is a well run and highly committed command which is a beacon of excellence in this sphere of work, with the experience gained and lessons learnt being of direct benefit to the current deliberations regarding strategic forces.
- The DPS is operating with a 10% vacancy factor for police staff and 5% vacancy factor for police officers due to MPS financial pressures. To mitigate this, there is active monitoring of staff vacancies and active succession planning in place, aided by bi-weekly workforce planning meetings where the developing situation is reviewed and monitored. Decision making is assisted by informative management data captured and circulated widely addressing issues such as establishment and sickness and monitoring gender and ethnicity issues.
- The DPS has robust selection processes and has clear process maps covering formal role profiles and advertisements, the completion of recruitment proforma and recruitment campaigns. In addition, guidance on selection processes, interviews, vetting levels and training for interviewers is included.
- The DPS HR policy focuses on proactive succession planning for roles, conducts environmental scanning and promotes flexible working practices to encourage staff from all backgrounds. Where skills are not readily available corporately, the DPS has focused on retraining staff, encouraged attachments through

development plans and the use of temporary DCs.

- The DPS holds annual staff 'open days' plus additional regular staff meetings to communicate DPS strategy aims and objectives.
- Although corporate policy restricts coaching individuals for promotion purposes, the DPS supports all of its staff through attachments and secondments to gain particular skills, as well as running mock boards, corporate and informal mentoring and by offering people support for study. The DPS has a consistently high success rate at sergeant and inspector promotion processes.
- The MPS has well-established 'family friendly' policies and these are being actively promoted within all aspects of the DPS. They include such measures as part-time working, job share, term-time working and a 30+ scheme. These are being more widely utilised for police staff but increasing requests are being received from officers in operational roles with supervisors encouraged to think creatively as to how best to accommodate these requests.
- Jobs are advertised openly and recruiting events have been held to foster interest and understanding of the DPS role and functions. These have been marketed well and have resulted in applications from outside the force area.
- The DPS HR department is in the process of advertising for black and minority ethnic (BME) surveillance officers aimed at addressing an operational need and is an example of positive action to attract recruits from the BME groups within the MPS into the DPS.
- There are welfare mechanisms in place to support staff within the ACC. Staff within that command felt confident that, if needed, support is forthcoming. Officers have access to external psychological counsellors. In addition, the welfare needs of officers engaged in proactive operations are fully considered within the risk assessments for deployments and their needs are regularly reviewed during the course of proactive operations.
- The turnover rate for staff in the DPS is high but this is viewed positively by the department, as many staff leave on promotion and in turn serve to spread the corporate value placed upon this aspect of police work within the MPS.
- Anticipated departure of staff is predicted through application of the corporate posting policy and the DPS posting policy. Through this, an assessment is made of any training needs and this is supported through re-training and familiarisation attachments as required. There is a standard operating procedure 'safeguards for officers/staff leaving DPS'.
- The ACC is working towards helping staff receive formal recognition for courses attended. It is examining officers' accreditation in the form of a BTEC qualification funded by the MPS. These monies will come from financial incentives given to the ACC from the Proceeds of Crime Act.
- The DPS has a clearly documented process for the induction of new staff. Prior to joining, DPS staff due for appointment receive a welcome letter and on the first day a comprehensive induction pack together with a training request form to be completed after discussion with the line manager. An evaluation form is completed by the new staff member after three months in post.

- Induction courses are in place for DPS staff. These courses are practically based and involve input from all the various commands within the DPS. The courses have been running for a year and in excess of 80 members of both police and support staff have attended.
- There is an integrated training strategy in the DPS with training needs analysis and delivery plan, also identified on the DPS PRR. The strategy links to corporate objectives and reflects local and corporate needs.
- OCU commanders are supported by the DPS training unit, which provides management information on the training status of all staff and identifies and delivers mandatory training for the OCU commanders.
- Training needs for DPS staff are identified through each individual's annual appraisal (PDR) and by line managers. All investigating officers and senior investigating officers (SIOs) have attended national and DPS SIO courses or there are plans in place for them to attend.
- The ACC holds yearly SIO courses for staff within the MPS. These include a paper feed exercise with representatives from the IPCC and CPS in attendance. BOCU commanders also attend the course. Throughout the three-day course, all departments within the ACC give a presentation to enhance awareness.
- The ACC has produced a video of a convicted police officer in which the officer endeavours to explain his actions. It also contains practical information on source handling and is an impactful training aid.
- The force sets up regular two-day training seminars for misconduct board members, utilising a firm of barristers. These have been held on several occasions and have included ACPO and superintendents. Newly-promoted superintendents are invited to the DPS for familiarisation with misconduct procedures.
- The DPS business department has conducted process mapping throughout the entire department so that anyone on appointment may consult a desk manual, which contains comprehensive information as to their new role and guidance on policies and procedures. This guide assists in integration and helps ensure a corporate approach to HR issues.
- The DPS has well-established methods of recording and monitoring PDR completion rates with over 95% completed. These comply with the integrated competency framework and role profiles and job descriptions are available on the DPS web page.
- The MPS has a clearly defined framework for the formulation and development of policy, including the completion of a policy workbook that includes assessment of the policy for compliance with legislation on race relations, disability discrimination, human rights and freedom of information.
- All those interviewed within the DPS business unit indicated there was good leadership, a clear sense of purpose, regular meetings and a consultative style of management, which combined to result in good communication of both strategy and vision.
- The implementation group for Morris etc consists of the two MPA deputy chairs,

the chair of the diversity board, the chair and deputy of the HR committee and the MPA PSD chair plus other members of the MPA. This group meets every two months and sets high level strategic goals and strives to avoid duplication. The response to Morris etc has been aggregated into outcomes prioritised into four strands in order to ensure ownership. Individual MPA committees are engaged on these strands and ensure that the detail is examined.

- Staff within the ACC felt that they received the support from their senior managers and that welfare support was available for proactive staff.
- All DPS PDRs are focused on national competencies and have at least two objectives that are directly aligned to the DPS business plan (within the risk register). All DPS staff have role profiles from within the national competency framework. Training on PDRs was provided to those supervisors that wished to attend. Email instructions were sent out to all staff. The DPS has a formal posting policy setting down the maximum and minimum periods for officers to serve within the command. This is referred to in all adverts. The DPS is awaiting the formal publication of the MPS corporate rotations policy that may impact on local policy. Tenure details are communicated to all OCU commanders on a monthly basis from within the DPS service profiles database. Diversity is a competency on almost all role profiles and PDRs.
- The DPS has introduced police staff investigators. There are four staff currently in post with four new members being recruited. These are fully engaged as key members of the borough support unit investigation teams. A comprehensive investigative support officers programme has been devised that comprises a foundation module, a four-day course on statements and interviewing, a one week's investigating officers course with progress monitored closely over a 12-month period with final sign-off by the line manager. There is effective integration of these staff members within the investigative process.
- DPS HR provides management information in relation to the diversity breakdown of staff. Female and BME numbers are well above corporate targets for police staff. The DPS has more female officers than the corporate target of 20% but has 4.4% BME officers against a 7.7% corporate target.
- The DPS has appointed a diversity co-ordinator, focused on implementing a DPS diversity excellence model, encouraging applications from BME officers in adverts, liaising with the Samurai group and IAG members to promote the DPS, conducting successful open days and currently progressing a positive action process in relation to specific ACC roles. This postholder is able to advise on a wide range of issues and has the opportunity to attend key DPS meetings.
- Following recognition that one office could not effectively manage Freedom of Information requests within the MPS, the public access office was closed and the process devolved to BOCUs. The postholder in the DPS has created a centre of excellence, which is used as a consultation base by others across the MPS.
- The Police Federation is actively engaged at strategic levels within the MPS and in the DPS, where good links are said to exist. The Federation cited a number of instances where, following consultation on issues such as drugs misuse, taint and adverse judicial findings, constructive but critical comments had been listened to and adopted or included in the amended final drafts.
- The satisfaction levels of MPS 'internal' customers were independently assessed

during the Morris Inquiry when a survey was conducted of all MPS staff. Presently, the research commissioned from Cambridge University to deal with issues of diversity and disproportionality amongst employees is currently at the focus group stage whereby MPS employees' views will be sought once again.

- DPS IT strategy was compiled to take clear account of a number of cross-cutting business themes such as intelligence, security and case management and has synergy with the force directorate of information strategy. The DPS IT strategy is accompanied by a delivery plan.

### **Areas for Improvement**

- The MPA and MPS have agreed that all recommendations emanating from Morris, Taylor, CRE and the Ghaffur reports will be dealt with by reference to a set of agreed outcomes, which encapsulate relevant recommendations. From these outcomes four priority outcomes have been determined, one of which for example includes devolvement of local investigations to BOCU command. However, whilst this may be a sound way of managing the series of recommendations by aggregating these into outcomes, the MPS and MPA should be satisfied that systems remain in place with clear lines of accountability for action on the detailed recommendations.

#### **RECOMMENDATION 7**

**Her Majesty's Inspector recommends that the MPS should be satisfied that, when managing the implementation of the recommendations of Morris, Taylor, CRE and Ghaffur by aggregating outcomes, systems remain in place that have clear lines of accountability for action on the detailed recommendations.**

- The MPS has placed significant focus within the DPS review on structures and processes. Whilst this will clarify key organisational issues, in moving forward the MPS should be satisfied that there is a clear focus on the cultural change required to become a learning organisation. This will be vital to achieve an improved service.

## RECOMMENDATION 8

**Her Majesty's Inspector recommends that the MPS should be satisfied that whilst progressing the structural and process change within the DPS review there is a clear focus on the cultural change which is required to become a learning organisation.**

- The MPS has strived to ensure effective consultation and communication about the DPS review. However, there were significant numbers of staff within the DPS who had not been consulted about the DPS changes or were not aware of progress. There appears to have been a lack of understanding with staff in certain quarters. There is also a lack of communication as to what the rationale is for the change.

## RECOMMENDATION 9

**Her Majesty's Inspector recommends that the MPS should revisit the consultation process for the DPS review, notwithstanding the significant efforts that have already been made to ensure effective engagement at all levels.**

- The PSD is spread widely across the MPS on too many disparate sites. There are acknowledged difficulties in IT communications between remote sites. Funding has been approved for the implementation of wide area networks to address some of the problems.
- The DPS IT strategy identifies shortcomings in the IT infrastructure for the Directorate and the fact that current technology will not allow the Directorate to exploit new opportunities such as video conferencing or flexible deployment. An IT strategy delivery plan is being prepared that strives to recommend a way forward. Of particular concern is that the Clue 2 IT system used within the DPS is inappropriately being used as an intelligence tool. This is having a knock-on effect on case and investigation management. A project to implement the MPS standard intelligence tool (Crimint Plus) is within the delivery plan to resolve this issue and support the new intelligence command.
- There are many IT systems with data about professional standards within the MPS in various business groups. These include the complaints data system and intelligence management system in the DPS, the police staff discipline unit database and employment tribunal database in the HR Directorate and the police staff discipline appeals database in TP. The current way data is stored in various systems presents an obstacle to the efficient progression of professional standards.
- The inspection team examined working conditions for some staff after complaints that they were unsuitable and in poor condition. Rooms at Tintagel House are in a shoddy state and are in need of modernisation to become a suitable working environment for staff. The hearing rooms on the sixth floor were found to be unfit for purpose, not soundproofed, poorly maintained and cold.

- Currently, vetting is carried out by staff at four disparate locations, with DPS having responsibility for recruit vetting for police and police staff, contractor vetting and management and internal vetting. All vetting decisions regarding discipline files are made by the DCS MCAV and are anchored to the sanctions guidelines. The vetting function is undergoing a review that will determine if all vetting functions should be combined. However, there was evidence that the current system militates against clear leadership of the vetting function, communication and exchange of information.
- The post of review officer within the DPS has proved beneficial and provides an independent scrutiny of cases. However, there is a lack of clarification of that officer's position and status. Senior managers also need to openly demonstrate their support for this work and encourage examination of more current live cases and operations. A review of this postholder's line management could usefully be undertaken as his contribution could be enhanced were there to be more direct links with senior management.
- The DPS not only has entry and induction packs but also exit packs, which include a checklist of issues to be addressed before staff re-enter core policing functions. Whilst this policy exists, there are some doubts as to whether it is being actioned operationally. Staff interviewed from specialist investigations were unaware of there being any reintegration back into the MPS and exemplified cases when that had not occurred.
- Within the DPS 77% of staff are trained in community and race relations. This is delivered corporately by the Diversity Directorate which has not previously been able to allocate sufficient courses to meet DPS demand. Following the CRE recommendation, corporate rollout of a new two-day course for front line personnel is being implemented. DPS has course allocation for the autumn and should achieve 90% trained or higher for officers. The lack of such training was identified in the DPS training needs analysis and performance submission. With new equalities legislation forthcoming in relation to disability and gender, as well as recent changes in relation to age and sexual orientation, DPS will need to ensure there is a wide focus.
- The investigation staff within the DPS have all received community and race relations training which is generic and not bespoke to PSD investigations. There appears little in the way of bespoke training for investigators other than a one-week induction course.
- The MPS experiences difficulties in consulting with the Samurai group, which is a representative group for minorities within the MPS, as there is no one person that can represent members. The Samurai group has the potential to make a significant contribution to the DPS review and similar key developments in the MPS but will fail to do so without clear terms of reference and agreement.
- Performance indicators are vital to ensure BOCUs are held to account for performance effectively. The current measures are all quantitative and generally about completion times. There are no measures based on customer satisfaction and there is concern that this may be leading staff to complete cases too quickly, irrespective of quality. However, the MPS has recognised the importance of effective performance indicators and DCS IIC is beginning to identify complaint indicators that are closely linked to improving customer service.
- There are no police staff investigators within specialist investigations but the staff

considered that this would be a progressive move, identifying cases where there would be benefits accrued - such as releasing detective time, taking some statements and collecting some exhibits.

- The MPS has a challenge to ensure that representative groups and associations are consulted and feel enfranchised, otherwise this could present a barrier to success. This issue is wider than the DPS review and includes the management of change generally in the MPS.
- Surveys to ascertain the level of complainants' satisfaction were last conducted in 2001 on behalf of the DPS by the MPS research and survey unit .The return of completed survey responses from complainants at that time was poor and reported to be disproportionate to the resources employed and was discontinued. Plans are in place to reintroduce the survey programme, although this yet to take place.



## **C - GLOSSARY**

|          |                                                                                           |
|----------|-------------------------------------------------------------------------------------------|
| AC       | Assistant Commissioner                                                                    |
| ACC      | Anti-Corruption Command                                                                   |
| ACCAG    | ACPO Counter-Corruption Advisory Group                                                    |
| ACPO     | Association of Chief Police Officers                                                      |
| BA       | Baseline Assessment                                                                       |
| BME      | Black and Minority Ethnic                                                                 |
| BOCU     | Basic Operational Command Unit                                                            |
| CPS      | Crown Prosecution Service                                                                 |
| CRE      | Commission for Racial Equality                                                            |
| DCS      | Detective Chief Superintendent                                                            |
| DD       | Deputy Director                                                                           |
| DPS      | Directorate of Professional Standards                                                     |
| DSU      | Dedicated Source Unit                                                                     |
| HMIC     | Her Majesty's Inspectorate of Constabulary                                                |
| HR       | Human Resources                                                                           |
| IAG      | Independent Advisory Group – a body advising a force or BOCU on race and diversity issues |
| IDG      | Intelligence Development Group                                                            |
| IIC      | Internal Investigation Command                                                            |
| IPCC     | Independent Police Complaints Commission                                                  |
| MCAV     | Misconduct, Civil Action and Vetting Command                                              |
| MPA      | Metropolitan Police Authority                                                             |
| MPA PSCC | Metropolitan Police Authority Professional Standards and Complaints Committee             |
| MPS      | Metropolitan Police Service                                                               |
| NIM      | National Intelligence Model                                                               |
| PDR      | Performance Development Review                                                            |
| PRR      | Planning and Risk Register                                                                |
| PRT      | Prevention and Reduction Team                                                             |
| PSD      | Professional Standards Department                                                         |
| PSSC     | Professional Standards Strategic Committee                                                |
| RIPA     | Regulation of Investigatory Powers Act, 2000                                              |
| SIA      | Strategic Intelligence Assessment                                                         |
| SIO      | Senior Investigating Officer                                                              |
| SIT      | Specialist Investigations Team                                                            |
| STCG     | Strategic Tasking and Co-ordination Group                                                 |
| SPOC     | Single Point of Contact                                                                   |
| TP       | Territorial Policing                                                                      |