



Inspecting policing
in the public interest

**Revisiting police
relationships:
progress report**

**Nottinghamshire Police
December 2012**

About this review

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

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

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

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

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

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 Nottinghamshire

Since 2011 Nottinghamshire Police has conducted an integrity “healthcheck”, using the Self-Assessment Checklist provided in HMIC’s 2011 report, *Without Fear or Favour*. This resulted in the production of an action plan to address areas for further development. Progress against this action plan is overseen by the deputy chief constable (DCC). Policies covering relationships with the media and others, acceptance of gifts and hospitality and use of social media have been updated. The force has also strengthened its information security standards.

How are press relations handled, and information leaks investigated?

The force has updated its media policy, which takes into account guidance issued by the Association of Chief Police Officers (ACPO). This outlines how relationships with the press should work, and is supported by a red, amber, green (RAG) system for staff which describes clearly the types of issues and information that can and cannot be discussed with the media. We found that staff were aware of these new rules.

Between September 2011 and May 2012, the force investigated three instances of inappropriate disclosures to the media. Two of these investigations were ongoing at the time of our inspection.

The force has produced a policy on how police officers and staff should behave on social networking sites (such as Facebook and Twitter). This policy covers the standards of behaviour expected when staff are both at work and off duty, and the force is working on improving its ability to monitor social media. HMIC’s independently commissioned research identified five cases of potentially inappropriate behaviour on Facebook or Twitter by officers and staff in Nottinghamshire, which have been referred back to the force.

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

Recognising that staff and officers now work across different force areas (as part of collaborative arrangements in the East Midlands) the **gifts and hospitality** policy has been updated to create a common approach in the region. The policy reflects both the findings of the HMIC report *Without Fear or Favour* and recent guidance published by ACPO. In future, local managers will decide whether particular gifts or hospitality should be accepted in line with the updated force policy, while the register of gifts and hospitality will be overseen by the head of the Professional Standards Department (PSD). Staff spoken to as part of this reinspection were fully aware of the policy requirements.

The use of corporate credit and procurement cards is tightly controlled through internal audit procedures, and expenditure on them is low. Monitoring to cross-reference contract and **procurement** registers with the gifts and hospitality register to ensure the integrity of the procurement process (e.g. to look out for instances where a company provides hospitality and is then awarded a contract) is to be introduced as part of the updated gifts and hospitality policy. This monitoring will be completed through the sharing of the gifts and hospitality register with the force Commercial Director.

Nottinghamshire Police's policy for seeking approval to have a **second job** requires that all applications are assessed and approved by PSD. This helps ensure there is consistency and scrutiny in respect of the application process. PSD ensures all requests are reported through a Standards and Conduct Board chaired by the DCC. All registered second jobs are subject to an annual review. Since September 2011 there have been 113 applications for second jobs, 109 of which have been approved.

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

The force and police authority discussed transitional arrangements relating to the introduction of PCCs; these included the future arrangements for the oversight of professional standards within the force. The recently elected PCC will need to be satisfied with the governance and reporting mechanisms for these issues.

Data provided by the force to HMIC shows that there has been no change in the number of staff working in the anti-corruption unit since our 2011 inspection, and that a number of vacancies within that unit have now been filled. Agency staff are also brought in to support the work of the unit when required. The force is one of a number in the East Midlands collaboration project, and is exploring whether this may provide an opportunity to enhance the capacity and resilience of its anti corruption unit. The force has instigated 28 investigations between September 2011 and May 2012 into the conduct of its officers and staff in relation to the areas covered by this report.

The force has introduced a set of values for officers and staff which include the need to work with the 'utmost integrity, trust and honesty'. These values are being incorporated into all selection and promotion processes. The Standards and Conduct Board, chaired by the DCC, has a policy of providing support to staff in debt and also considers other areas of risk where staff may become susceptible to integrity issues for financial gain. Vetting of officers and staff has been enhanced to cover information on lifestyle risks (such as problems with debt).

Next steps

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

