

and extended both the public survey work and the review of police use of social media.

As in 2011, our focus was on the systems and processes in place to manage what in this report are termed ‘key integrity issues’: police relationships with the media; information disclosure to the media and others; acceptance of gifts and hospitality; procurement and contracting processes; monitoring and approval of second jobs and business interests; proactivity in identifying, monitoring and managing risks to integrity; and (although this was not a leadership review) the governance and arrangements in place to oversee the force’s response to identified risks.

Results of the public survey

There was little difference between the 2011 and 2012 public survey results.⁶ About a third of respondents still questioned the integrity of the police, with 36% believing corruption was fairly or very common in the service. When we asked these people why they thought this (giving them a number of options to choose from), two common answers were because they had seen stories in the national media (cited by 81% of people asked this question), and that they believed there to be corruption in all professions/sectors (73%).

Overall trust in and expectations of the police remained high. For instance, most respondents (89%) expected the police to be more honest than “the average person on the street” – the same percentage as in 2011.

Progress against recommendations from *Without Fear or Favour*⁷

“Forces and authorities should institute robust systems to ensure risks arising from relationships, information disclosure, gratuities, hospitality, contracting and secondary employment are identified, monitored and managed.”

HMIC (2011) *Without Fear or Favour*

In 2011, responsibility for managing integrity issues was spread amongst various units within each force, with no consistency across England and Wales. By the time of the revisit, force-level oversight of many integrity issues had been transferred to Anti Corruption Units (ACUs) and Professional Standards

⁶ Telephone polls were conducted in August, September and October 2012, with a total of 3,567 respondents across the three waves. The poll was designed to give comparable results to the 2011 survey.

⁷ *Without Fear or Favour* made six recommendations. Force and authority progress against the four addressed to them are assessed here. The other two recommendations were for “the service [to have]...detailed proposals in the above [integrity] areas ready for consultation with all relevant parties by April 2012” (covered on pp.27–8 below); and for ‘An assessment relating to these matters [to] be conducted by HMIC by October 2012 to inform incoming Police and Crime Commissioners and Police and Crime Panels’ (fulfilled through publication of this report).

Departments (PSDs).⁸ We consider this to be a good model, because it allows one unit to have a complete picture of integrity issues across the force.

We were encouraged to find that staffing levels in ACUs have remained largely unchanged since 2011 (despite the pressure placed on police force budgets by the 2010 spending review⁹). However, in a small number of forces ACU staffing levels have either fallen or remain very low; we are concerned that these units are unlikely to have the capacity to be anything other than reactive.

Identifying risks

In order to identify areas where they are potentially vulnerable to corruption, since our last inspection all forces and 36 police authorities conducted organisation-wide integrity 'health checks',¹⁰ and then put in place plans to remedy the weaknesses. In implementing these plans, most forces have developed new policies and procedures for various integrity issues, such as when gifts and hospitality should be declined, and what kinds of second jobs are appropriate for police officers and staff.

While we found that more forces are now proactively gathering information in order to help them recognise potential integrity issues, the service is still not doing enough to identify areas, groups and individuals who may be more vulnerable to corruption (so that they can receive targeted support as part of preventative activity). By way of example, Police Mutual (PM)¹¹ analyses the level of financial stress experienced by officers and staff – but many forces do not, although this would help them to establish if some people might be more vulnerable to corruption for economic reasons.

Monitoring and managing risks

As we discussed in *Without Fear or Favour*, it is important that the police maintain good **relationships with the media**, who provide a key channel for getting information to and from the public: but these relationships have to be open and able to be checked and challenged. To this end, since 2011 all but one force have put procedures in place to ensure meetings and discussions with the media, whether national or local, are appropriately recorded.

The great majority of integrity investigations carried out by ACUs and PSDs still concern inappropriate **disclosure of information**. To help monitor and manage this, at least 12 forces are considering purchasing software that will automatically check and audit activity across force IT systems, and so help trace the source of any information leaks.

The number of investigations by forces into the use of **social media** by officers and staff has increased since 2011. However, monitoring of social network sites such as Twitter and Facebook is largely confined to scrutinising staff and officer comments and behaviour on force-run sites and accounts, with only nine forces

⁸ PSDs oversee professional standards and complaints from the public about the force. ACUs are solely responsible for overseeing issues around preventing and investigating corruption.

⁹ The spending review requires a 20% reduction in the central policing budget between 2011/12 and 2013/14. See HMIC (2011) *Adapting to Austerity*. Available from www.hmic.gov.uk

¹⁰ Many used the self-assessment checklist in *Without Fear or Favour* to help them do this.

¹¹ Police Mutual (2012) *Portrait of the Police 2012: A Police Mutual study of Police Officers' and Staff's financial priorities, lifestyle and morale*. Available from www.policemutual.co.uk

stating that they had the capacity to check for inappropriate behaviour on personal accounts. Another nine forces do not monitor staff use of social media at all.

We found evidence of all forces checking and signing off the information held on **gifts and hospitality** registers, and that some ACUs and PSDs were challenging any entry which appeared to contravene the rules on what should and should not be accepted (as laid out in ACPO guidance or force policy). However, there was little evidence of this type of challenge being directed at chief officers.

Some – although not all – forces also cross-check entries on the gifts and hospitality registers with other force documents (for instance, with procurement records, to see if there are examples of a company providing hospitality and then being awarded a contract). However, we did not find any evidence of more targeted and proactive checks to test the accuracy and completeness of information recorded on the registers, such as by conducting unannounced, random diary checks against register entries and confirming these details with the hospitality provider. Similarly, while some forces have improved their mechanisms for monitoring the use of corporate **procurement and credit cards**, a significant proportion still wrongly focus solely on the accuracy of the spend rather than on the justification and appropriateness of the purchase.

“There should be clear boundaries and thresholds in relation to relationships, information disclosure, gratuities, hospitality, contracting and secondary employment. Such limits should be consistent and service wide.”

HMIC (2011) *Without Fear or Favour*

HMIC found that police authorities had made little progress in developing policies and guidance to specify the behaviour expected (both of their forces and of their own members) in areas such as the acceptance of gifts and hospitality and the use of social media. This is disappointing, especially as we expected authorities to have made more progress as part of their preparations for the handover to PCCs.

Interviews and police focus groups showed that frontline staff and supervisors continue to have a clear sense of what is and is not acceptable behaviour. However, this was often directed not by a good understanding of the policy and procedures on integrity issues, but rather by a reliance on their ‘moral compass’, a more instinctive grasp of how they should be acting.

While all forces had made some progress since 2011 in developing policy and guidance on integrity issues (so that officers and staff know what is expected of them), many reported that they had not yet completed this work because they were waiting for new national Association of Chief Police Officers (ACPO) guidance. While this was being finalised as this inspection took place, HMIC is yet to be convinced that it will address the overall lack of service-wide standards

on integrity issues,¹² because it does not currently cover all the key integrity issues considered in *Without Fear or Favour*.

This notwithstanding, our 2012 review found a small number of cases where the police, including senior officers, were still not complying with the existing policies and guidance on integrity. This is disappointing, and suggests there are people in the service who still do not understand what is expected of them.

“Training courses should include appropriate input in relation to integrity and anti-corruption. In particular, given the importance of leadership to securing high standards of integrity, the Strategic Command Course¹³ and the High Potential Development Scheme¹⁴ should encompass these issues.”

HMIC (2011) *Without Fear or Favour*

We found that while some forces had educated some officers and staff in some integrity issues (for instance, by sending their communications team on a media training course), many had deferred updates to their training courses while they waited for the national ACPO guidance to be issued. Even allowing for this, however, the service should have made more progress against this recommendation. For example, it is disappointing to find no plans for a national educational and awareness-raising campaign aimed at helping to prevent corruption in police relationships with the media and others.

Furthermore, our inspection found that senior leaders had not received training on how to identify, prevent and manage corruption in their force, nor on the standards of integrity expected of them as individuals. The Strategic Command Course (SCC) and the High Potential Development Scheme (HPDS) do now include some training on the management of integrity issues: but there are no plans to provide this to existing chief officers, or to those who completed the SCC before 2012 but have not yet been promoted to the senior leadership.

“Chief officer teams should review their corporate governance and oversight arrangements to ensure that those arrangements are fulfilling their function in helping promote the values of their force in the delivery of its objectives, and that they are, through their action and behaviours, promoting the values of the organisation and making sure good corporate governance is seen as a core part of everyday business.”

HMIC (2011) *Without Fear or Favour*

Chief officer team oversight of what is going on in force is generally managed through routine structured meetings. We found that forces are now either

¹² In *Without Fear or Favour*, we stated that “The Police Service needs to undertake work to identify the standards and value [in relation to integrity] expected of its entire workforce.” HMIC (2011) *Without Fear or Favour*, p.18. Available from www.hmic.gov.uk

¹³ The SCC is a prerequisite for officers and staff seeking to attain the rank of chief police officer in the UK.

¹⁴ The HPDS provides a structured route to senior positions in policing. It identifies individuals with the potential to lead and helps them to develop the skills to fulfill their promise.

including integrity issues as an agenda item in an existing meeting, or have created new meetings specifically focused on this subject. In both cases, these meetings are also used to monitor the force's progress in addressing the issues raised in *Without Fear or Favour*, by bringing together different business areas (for instance, the information security manager to talk about data protection, and the finance manager to discuss force credit cards) so that the senior officer with the lead for integrity issues can have a better understanding of the integrity picture across the force.

In some forces, these meetings include representatives from staff associations. HMIC considers this to be good practice, because it potentially helps to create a group of advocates who can assist in identifying risks, and share messages and organisational learning about integrity with the rest of the force.

It is encouraging that forces have these structures in place to help them manage their response to potential corruption. However, it is too soon to determine how successfully these processes have been promoted, embedded and fully exploited, so that all those working in a force are fully aware of integrity issues.

Without Fear or Favour noted that police authority governance arrangements (over their forces and over their own organisations) were generally weak. In 2012, we found little had changed: only a few authorities had risen to the challenge laid out in our report and responded to the recommendations. This is a potential risk for PCCs, because they may lack the robust systems needed to identify potential corruption and to provide effective challenge to their forces. PCCs may wish to assure themselves that both their forces and their own Offices either already have effective governance and oversight arrangements in place to prevent, identify and mitigate risks to integrity, or that plans are being implemented to do so.

Conclusion and recommendations

The possession, development and consistent practice of high standards of professional and personal probity is fundamental to the core values of the police and what it means to be a police officer. The 2011 report should have added impetus to force and authority work to identify, monitor and manage integrity issues. While some progress has been made, particularly around putting in place processes and policies to manage threats to integrity, more needs to be done. The pace of progress 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.

In particular, our findings show that more needs to be done to embed an awareness of integrity issues in everything forces do. If this were more evident, it should give the public more confidence that the service can regulate itself in respect of the integrity matters covered in our two inspection reports.

There clearly remains more for forces to do, particularly around ensuring that they have robust checks in place so that they can have confidence that their

new policies and processes are being followed. There is also a challenge for PCCs¹⁵ to assure themselves that they have effective governance structures in place to hold forces to account for their progress in making sound arrangements in connection with matters of integrity.

We make the following key recommendations:

- **The evidence shows that progress is inconsistent across forces and more needs to be done with a greater sense of urgency if the public is to have confidence that the service takes integrity matters seriously and is gripping them effectively. Therefore, in addition to scrutiny of chief officers by PCCs, there continues to be a need for independent external scrutiny by HMIC, including unannounced inspections.**
- **There is little evidence of force professional standards departments checking and challenging chief officers in connection with issues of integrity. A more transparent and challenging environment needs to be created. PCCs should assure themselves that their forces are nurturing such environments with effective internal scrutiny and challenge.**
- **More robust and auditable corporate governance arrangements are required if the new accountability arrangements are to work effectively. These need to differentiate clearly the roles and responsibilities of chief officers and PCCs.**
- **The College of Policing should quickly develop sound professional standards for training and development in connection with issues of integrity.**

We also highlight a number of other recommendations (shown in bold) in the main body of the report. If acted upon, these should help the service and PCCs address the particular areas of concern identified in this report. A complete list of recommendations is at Annex A.

Next steps

HMIC is particularly concerned about the pace of progress in responding to the issues raised in *Without Fear or Favour*. We also consider that the service is not yet able to provide the evidence needed to give us or the public confidence that it is making sufficiently sound arrangements in connection with integrity. HMIC will therefore continue to inspect these issues as part of our existing inspection of forces, including through unannounced inspections. The results of this inspection activity will be communicated to forces and PCCs, and (as appropriate) published on the HMIC website (www.hmic.gov.uk).

¹⁵ Previously, HMIC would have directed recommendations about governance and other related matters to police authorities. Since police authorities ceased to exist in November 2012, HMIC will instead seek to ensure that PCCs are fully informed about improvements needed in the corporate governance arrangements they have inherited.

Introduction

HMIC's 2011 review

During 2011, there were a number of high-profile cases involving alleged police corruption, with issues arising from the phone-hacking affair receiving particularly extensive national media coverage. In July 2011, the Home Secretary commissioned Her Majesty's Inspectorate of Constabulary (HMIC) to review and make recommendations on "the integrity of police relationships with the media and others"¹⁶ across the 43 police forces and authorities of England and Wales.¹⁷

The 2011 review comprised inspection fieldwork; telephone surveys of public opinion; an assessment of academic research available on the subject; a review of police use of social media; and benchmarking work with national and international service providers and businesses. It was a tightly defined piece of work, which focused on the systems and processes forces and authorities had in place to identify, monitor and manage integrity issues. It did not review how the cases in the news had arisen, or how they were being investigated.

Findings were outlined in a report, *Without Fear or Favour*, which was published in December 2011.¹⁸ In this, HMIC made four¹⁹ recommendations to the service:

- *Forces and authorities should institute robust systems to ensure risks arising from relationships, information disclosure, gratuities, hospitality, contracting and secondary employment are identified, monitored and managed.*
- *There should be clear boundaries and thresholds in relation to relationships, information disclosure, gratuities, hospitality, contracting and secondary employment. Such limits should be consistent and service wide.*
- *Training courses should include appropriate input in relation to integrity and anti-corruption. In particular, given the importance of leadership to*

¹⁶ Commissioning letter in HMIC (2011) *Without Fear or Favour*, p.3. Available from www.hmic.gov.uk

¹⁷ This scope was extended to include the British Transport Police (BTP), the National Policing Improvement Agency (NPIA) and (at their own request) the Police Service of Northern Ireland (PSNI).

¹⁸ HMIC (2011) *Without Fear or Favour*. Available from www.hmic.gov.uk

¹⁹ *Without Fear or Favour* made six recommendations. Force and authority progress against the four addressed to them are assessed in this report. The other two recommendations were for "the service [to have]...detailed proposals in the above [integrity] areas ready for consultation with all relevant parties by April 2012" (covered on pp.27–8 below); and for 'An assessment relating to these matters [to] be conducted by HMIC by October 2012 to inform incoming Police and Crime Commissioners and Police and Crime Panels" (fulfilled through publication of this report).

securing high standards of integrity, the Strategic Command Course and the High Potential Development Scheme should encompass these issues.

- *Chief officer teams should review their corporate governance and oversight arrangements to ensure that those arrangements are fulfilling their function in helping promote the values of their force in the delivery of its objectives, and that they are, through their action and behaviours, promoting the values of the organisation and making sure good corporate governance is seen as a core part of everyday business.*

We also highlighted (as ‘considerations’) a number of good practice points, and provided a self-assessment checklist which forces and authorities could use to conduct integrity ‘health checks’ of their organisations.

HMIC committed to returning to check on progress against these recommendations in 2012.

Other reviews

Without Fear or Favour was not the only work to examine issues related to the phone-hacking affair. Our 2011 inspection therefore took account of (and avoided duplicating) the following reviews:

- Lord Justice Leveson’s inquiry into the culture, practice and ethics of the press;²⁰
- the review by Elizabeth Filkin, commissioned by the then Commissioner of the Metropolitan Police Service (MPS), into the ethical issues arising from the relationship between the police and the media;²¹
- the first part of the Independent Police Complaints Commission’s (IPCC) report into corruption in the police service in England and Wales;²²
- the investigations by the MPS arising from the phone-hacking affair into possible criminal activity by members of police forces, journalists and others (Operations Weeting, Elveden and Tuleta); and
- the Home Affairs Select Committee²³ and Culture, Media and Sport Select Committee²⁴ reports considering the issues arising from the phone-hacking affair.

²⁰ Published 29 November 2012. Available from www.levesoninquiry.org.uk

²¹ Available from www.met.police.uk

²² IPCC (2011) *Corruption in the police service in England and Wales*. Available from www.ipcc.gov.uk

²³ House of Commons Home Affairs Committee (2011) *Unauthorised tapping into or hacking or mobile communications (HC Paper (2010-12) 13)*. Available from www.parliament.uk The Committee took follow-up oral evidence on 04 September 2012.

Both the Leveson Inquiry and the investigations by the MPS continued into 2012 and received wide coverage in the media. This has ensured that concerns about police integrity have retained a high public profile – especially as other concurrent investigations into allegations of police corruption have been in the news. Some of these cases relate to the handling of historic investigations, such as the Hillsborough disaster of 1989, while others relate to senior officers being investigated over integrity issues.

This prolonged and intense public scrutiny makes it all the more important for the service to show it is doing all it can to grip integrity issues.

²⁴ House of Commons Culture, Media and Sport Committee (2012) *News International and Phone-hacking (HC Paper (2010-12) 11)*. Available from www.parliament.uk

Methodology

The purpose of this revisit was to assess progress made by the service since our 2011 review of integrity issues. We therefore re-inspected all 43 Home Office-funded forces in England and Wales, the British Transport Police (BTP), the Police Service of Northern Ireland (PSNI) and the National Policing Improvement Agency.²⁵

We wanted our findings to inform newly elected Police and Crime Commissioners (PCCs) in relation to the integrity issues they might wish to raise with their forces. As PCCs took up office on 22 November 2012,²⁶ this meant the fieldwork had to be completed during July and August 2012. Preparation for and the policing of the London 2012 Olympic and Paralympic Games made this a particularly busy time for forces. Our methodology was therefore designed to minimise the inspection burden on the service, and comprised:

- one day of fieldwork in each force (two days in the MPS), involving interviews with key staff and focus groups with frontline staff and supervisors;
- asking forces to provide information and performance data on a range of integrity issues (for the period September 2011 to May 2012²⁷), together with any policies that had been amended since the first review;
- engaging with a small number of stakeholders who were contacted during the 2011 review, such as the Independent Police Complaints Commissioner (IPCC) and the Information Commissioner's Office (ICO), to ask their views on progress made;
- expanding the 2011 independent research into police use of social media (which looked at eight forces) to include all 43 Home Office-funded forces, and the BTP; and
- repeating and expanding the 2011 independent public survey work.²⁸

As in 2011, evidence was gathered under eight headings: Public perceptions of integrity; Relationships with the media and others; Information disclosure (including social media); Gratuities and hospitality; Procurement and contractual

²⁵ Findings from the PSNI and NPIA are not included in this thematic. This is because we were in Northern Ireland by invitation only, while the NPIA no longer exists.

²⁶ PCC elections did not take place in London. Instead, the Metropolitan Police Service is directly accountable to the elected mayor (to whom PCC powers transferred on 16 January 2012). In the City of London, the Common Council remains the police authority for the force. The British Transport Police also still reports to a police authority.

²⁷ Data used in the 2011 review ran until August 2011. For the revisit, the end of May 2012 was the latest date in respect of which HMIC could gather data for all forces before starting fieldwork.

²⁸ More information on the public survey work is given on pp.15–17 below.

relationships; Secondary business interests and conflict of interest; Professional standards and proactivity; and Governance and oversight.

As well as this thematic report, individual force reports have been produced. These are available to download from www.hmic.gov.uk

A note on the timing of the inspection

Two timing issues have had some impact on the pace at which the service has responded to the first review. First, the period covered by the data collection (September 2011 to May 2012) included some months when forces and authorities were unaware of the findings and recommendations of *Without Fear or Favour* (which was published in December 2011). Second, the fieldwork period overlapped with the Association of Chief Police Officers (ACPO) issuing updated guidance on several integrity issues, which many forces waited for before developing their own policies. Where relevant, we have noted the impact of these limiting factors in the findings that follow.

Public perceptions

As part of our 2011 inspection, HMIC commissioned a series of telephone surveys to establish the public's view of the scale and nature of corruption in the service. The results showed that while most respondents did not think corruption was a common or a big problem, and believed officers were doing a good job, a significant minority (about a third) had some doubts about the integrity of the police.

We repeated the surveys in 2012, to see if this picture had changed. This chapter summarises the main findings; full results are available to download from www.hmic.gov.uk/data.

Methodology

An independent research company conducted a monthly telephone survey from August to October 2012, with 3,567 respondents (combined total) from across England and Wales. The question set used was designed to give comparable results to the 2011 survey.²⁹

Comparison of 2011 and 2012 results

Overall, there was little difference between the findings for 2011 and 2012.

The 2012 cohort reported similar levels of *trust* in the police:

- Most (59%) thought the police in general were doing a good or excellent job (61% in 2011);
- The majority (61%) did not think corruption was common in the police (63% in 2011).

Expectations of the police also remained high:

- 89% still expect the police to be more honest than the average person (89% in 2011);
- Three-quarters (75%) said they trust the police to tell the truth (74% in 2011).

²⁹ Telephone polls were conducted in August, September and October 2011, with a total of 3,571 respondents. Full question set and results available from www.hmic.gov.uk

However, the 2012 results showed a significant minority of respondents still has *doubts* about the integrity of the police:

- 36% thought corruption was fairly or very common in the police (34% in 2011);
- 42% thought disclosure of sensitive information to the media by the police was a fairly or very big problem (43% in 2011).

This shows a fairly consistent picture of high expectations and trust mixed with a persistent belief (by about one in three respondents) that corruption is a problem.

Why do people think corruption is a problem?

Questions were added to the September and October 2012 polls to explore why a significant minority of the public think corruption is a problem.³⁰ The results showed two common answers were:

- People reporting that they had heard about police corruption in national media reports (81% of people asked chose this option);
- Respondents claiming that corruption happened in all professions/sectors (73%).

A small number (38%, or 155 of the respondents across September and October 2012) of people said that they had experienced police corruption personally. We therefore used the October 2012 poll to ask for more detail about this group's experiences:³¹ but the majority (64%) declined to answer. This meant the remaining sample was too small in size for conclusions to be drawn.

However, qualitative work in the 2011 inspection found that the public has a very wide view of what constitutes corruption (which we summarised in *Without Fear or Favour* as being anything that resulted in a failure to treat the public fairly). The 2012 finding therefore can be used to underline the importance of the police acting with the highest integrity in all respects, since it suggests it is

³⁰ People who answered corruption was 'fairly' or 'very' common (853 respondents across the two months) were asked to identify why they thought this, by choosing as many options as they wanted from the following list: 'National media reports' (chosen by 81% of respondents); 'Opportunity for police officers to enrich themselves' (74%); 'It happens in all professions/sectors' (73%); 'It's human nature' (64%); 'Media reports generally' [i.e. local or national not specified] (54%); 'Local media reports' (51%); 'You know someone who has experienced it' (38%); 'Result of economic climate' (38%); 'You have personally experienced it' (38%).

³¹ This sample (86 respondents) was asked: 'Can you tell me a bit more about the circumstances in which you personally experienced police corruption?' Free text answers were (with number of respondents shown in brackets): 'The police officer lied in court/changed their story' (6); 'I know a police officer who is corrupt' (5); 'I/A family member was treated unfairly/they didn't listen/disregarded what I had to say' (5); 'I was threatened/physically attacked by the police' (3); 'Other' (14); 'Refused to answer' (55). Numbers rather than percentages are given here because of the small sample size.

not just the high profile cases of corruption read about in the national or local media that affect the public's trust in police integrity, but also personal, day-to-day interactions which can lead to at least the perception of unfair treatment.

Conclusion

The 2012 public survey results show a broadly similar picture to what we found in 2011. High expectations and levels of trust have been maintained: but the challenge in reassuring the 36% of respondents who still think corruption is fairly or very common in the police remains.

Identifying, monitoring and managing risks

Our 2011 recommendation

Forces and authorities should institute robust systems to ensure risks arising from relationships, information disclosure, gratuities, hospitality, contracting and secondary employment are identified, monitored and managed.

Why we made this recommendation

The 2011 report established that few forces had clear strategies or policies in place to stimulate the proactive identification and investigation of integrity and anti-corruption issues. There was little evidence that forces and authorities had considered how the findings of the Serious Organised Crime Agency (SOCA) Counter Corruption Threat Assessment³² applied to their own areas in order to determine their local integrity risks and threats.

Systems to prevent and detect corrupt behaviour needed to be strengthened and there were weaknesses in controls of some of areas that the service had not previously considered as presenting risks to integrity. There were significant inconsistencies in the ways in which forces and police authorities policed their relationships with external parties (including the media) and few had a sufficient appreciation of the potential risks of such relationships. Some also appeared to be unaware of the reputational risks that this could pose.

We also found that while forces and authorities had invested in Anti Corruption Units (ACUs), there was no national standard that specified how these units and practices should work. We therefore suggested that the ACPO Counter Corruption Advisory Group (ACCAG) advisory manual, which provides forces with tactical advice and guidance on this and was being redrafted as practice advice by NPIA, should be published on the relevant ACPO professional practice site as soon as possible.

What we found in 2012

Gathering information on integrity issues

All forces and 36 police authorities have used the self-evaluation checklist provided in *Without Fear or Favour* to help identify areas where they are potentially vulnerable to corruption, particularly in relation to a lack of organisational policy and procedures.

³² This assessment was published every three years, and outlined the impact that corruption was having on the police service at a national level.

We found that every force has also either conducted its own local corruption threat assessment (referring to the national SOCA assessment and national guidelines), or has a counter-corruption plan in place.

While this represents progress since the 2011 review, the number of forces proactively gathering intelligence to check compliance with their integrity-related policies remains worryingly low. Most forces need to carry out further risk assessments to identify any organisational areas or staff who are particularly vulnerable to corruption. For instance, analysis by Police Mutual (PM)³³ indicates that some 40,800 officers and staff may have medium to very high financial stress profiles: but most forces have not done this kind of assessment themselves, even though it may help them identify people who may be more vulnerable to corruption for monetary gain. If they did this sort of analysis, forces would be better placed to take preventative measures and provide the officers in question with appropriate support. It would also allow them to target and focus their work around collecting intelligence, and checking that integrity policies are being followed.

The 2011 report showed that all forces have a means for the anonymous and confidential reporting of integrity issues (whistleblowing). Our revisit indicated an increase in staff knowledge and use of such processes across England and Wales.

Proactivity: Anti corruption units

Data provided by forces show that between September 2011 and May 2012 there were 2,207 investigations into potential integrity breaches.³⁴ Information disclosure (excluding social media) accounted for 1,737 (79%) of these. Continuing the trend since ACUs were adopted nationally in 2006, this represents a significant increase in overall workload in relation to integrity issues in PSDs and ACUs: from an average of 151 investigations per month (1,817 cases) for the 12-month period up to March 2011, to an average of 245 investigations per month over the nine-month period assessed in this review.

At the time of inspection (31 May 2012), 708 of the 2,207 investigations were continuing; 45 had been referred to external bodies for further investigation; 744 had been resolved with no further action being taken; 643 had been resolved through management advice or warning; and 67 led to the individuals leaving the service, either through retirement, resignation or dismissal.

In *Without Fear or Favour*, we noted that there is no national standard which specifies what ACUs and practices should look like, and suggested that the ACCAG advisory manual should be published on the relevant ACPO professional practice site as soon as possible. It was disappointing to find that this has not yet happened: at the time of writing, the latest draft of the manual was under consultation and unlikely to be ready for publication until the end of 2012.

³³ Police Mutual (2012) *Portrait of the Police 2012: A Police Mutual study of Police Officers' and Staff's financial priorities, lifestyle and morale*. Available from www.policemutual.co.uk

³⁴ Investigations by ACUs and other units.

There has been no significant change in overall ACU staff numbers in England and Wales since the first review. In fact, despite the pressures on force budgets resulting from the 2010 spending review,³⁵ ACU resilience has increased in six force areas. However, some forces reported low levels of capacity and proactivity, and in nine forces the number of staff in ACUs has fallen slightly since the last review (although in five of these forces this was the result of merging units through collaborative arrangements to make more efficient use of resources).

In 2011, in many forces responsibility for managing different integrity issues was spread between units (with HR overseeing the second jobs policy, Finance the procurement processes, and so on). HMIC was encouraged to find that oversight for many integrity areas has now transferred to ACUs and PSDs. In particular, these units are now more likely to monitor and manage the policies and registers governing acceptance of gifts and hospitality, and second jobs. This allows ACUs and PSDs to develop a better overall picture of how the force is managing integrity issues.

The 2011 report recommended that the corruption lead for each force should be a senior detective who has the skills and experience to lead and supervise investigations, and who is in a position to inform and influence force-level decision-making. In 2012, we found that ACU activity is being led at detective inspector level in just over a half of forces; in most other cases, a detective superintendent or detective chief inspector assumes this role. However, there are a few forces where the ACU lead is at detective sergeant level. The units with more junior lead officers generally correspond to those with low levels of ACU resource. The risk is that this combination of reduced capacity and a more junior leadership, together with the finding that all forces' checking mechanisms are largely reactive (described below), means that these forces are unlikely to be able to take a sufficiently proactive and robust approach.

Proactivity: Monitoring and managing integrity issues in outsourced services

Some forces collaborate with the private or wider public sector by outsourcing certain elements of their work (such as call-handling and some back office functions).³⁶ Some forces require all staff working on these services to be vetted before a contract takes effect, and include force expectations of behavioural standards in their contracts, but this is not common practice.

HMIC found little evidence of any force allocating resources proactively to check and monitor integrity issues within outsourced services. Furthermore, there is no common approach to what role forces should play in the investigation and enforcement of unacceptable behaviour by outsourced staff. **HMIC recommends that as more forces consider outsourcing elements of their work, the service should reach agreement on the role of forces in the**

³⁵ This outlined a 20% reduction in the funding forces receive from central Government between 2011/12–2014/15. See HMIC (2011) *Adapting to Austerity*; HMIC (2012) *Policing in Austerity: One year on*. Both available from www.hmic.gov.uk

³⁶ See HMIC (2012) *Increasing Efficiency in the Police Service: The role of collaboration*. Available from www.hmic.gov.uk

investigation and enforcement of unacceptable behaviour by staff in outsourced services, with a view to producing national guidance to help forces identify and manage the potential risks to their reputations in this respect.

The rest of this section deals in more detail with how forces monitor, check and investigate specific integrity areas.

Relationships with the media

Data provided by forces show that between September 2011 and May 2012 there were:

- 19 *investigations into inappropriate relationships* with the media, compared to 12 investigations over the previous five years. Ten of these 19 investigations related to relationships with the local media, and nine with the national media (including cases related to the MPS Operations Elveden, Weeting and Tuleta, all of which relate to the phone-hacking affair). At the time of inspection, eight cases were still continuing (with two people suspended from duty as a result). Two of the eleven cases completed had been resolved through management action, while the remaining nine had been closed with no further action taken.
- 98 *investigations into information disclosure* to the media. Forty-eight related to possible unauthorised disclosure to local media and 50 to the national media (including those cases arising from the phone-hacking affair). At the time of inspection (31 May 2012) 39 were continuing (with six people suspended from duty as a result), eight had been referred to external bodies for further investigation, 41 had been closed with no further action taken, and ten had been resolved locally or through management advice.

In the 2011 report, we noted that the overarching principle of police relationships with the media is that the service should not seek to constrain the media but allow them to report news accurately, and work with them so that the public receives accurate and timely information. However, we stated that forces also needed to consider what should be the appropriate level and intensity of these relationships, and keep in mind how they could be perceived by the public.

Forces have taken some action since 2011 to manage the risks related to relationships with the media. One positive change has been the creation of formal processes in 38 forces to ensure closer working and information exchange between the corporate communications departments and PSDs in order to identify and discuss potential media leaks or inappropriate disclosures. In addition, all but one force have put in place procedures to ensure meetings and discussions with media representatives, whether local or national, are recorded appropriately. However, few forces had any mechanism in place to check compliance with this policy other than for staff working in media teams.

All but one force now have the ability to monitor force communications channels to look for inappropriate disclosures to media or other parties. Examples include the ability to search the telephone system for calls made to or received from particular numbers, and scanning computer systems for engagement with specific email accounts. However, these monitoring systems are used only reactively (i.e. when PSDs receive information that there might be a problem), rather than as a matter of routine.

In addition, monitoring capability varies from force to force. Thirty-four forces are able to monitor emails, computer access and telephone calls; in the other nine, the monitoring ability is not as broad ranging as they would wish.

Information security

Data provided by forces show that between September 2011 and May 2012, there were 1,737 investigations into inappropriate information disclosure (excluding disclosure via social media). This breaks down as information disclosed to criminals (364 cases); to friends/family (312); for personal use (367); to the media (98 – see p.21 above for more detail on this); and to 'others' (596). This compares with 1,634 investigations for the whole of 2010/11, continuing the year-on-year increase in this type of investigation apparent since 2006.

At the time of inspection (31 May 2012), 603 of the 1,737 information disclosure investigations were continuing. Thirty-eight had been referred to external bodies for further investigation; 641 had been resolved with no further action taken (including those unsubstantiated and withdrawn); 410 had been resolved through management advice or some form of warning; and 45 resulted in the member of staff leaving the organisation, either through being dismissed, resigning or retiring.

As in 2011, we found a lack of consistency nationally in the level of proactive monitoring of both information systems and the risks of inappropriate disclosure, although a number of forces are planning improvements in this area. The difference can in part be attributed to the wide variation in resources, technology and systems used by forces. The Police National Computer system³⁷ was subject to the most regular checks and audits, along with access and usage control on internet and email systems; but we found limited checking mechanisms in place on other force systems.

Forty-one forces have conducted regular audits or dip samples of some force systems to test whether they can be accessed from outside the organisation. Three forces were identified as not conducting any proactive checks on their information systems and data. Some forces stated they were planning changes to their checking mechanisms, with at least 12 considering purchasing software which can audit activity across all force systems.

We also found variations in the number of investigations into information disclosure forces undertake. The average number of investigations between September 2011 and May 2012 (from a total of 1,737) was 39 per force; however, this includes nine forces undertaking 60 or more investigations (including five forces with over 90 cases), while seven forces carried out 10 investigations or fewer (with one force only undertaking two).

³⁷ The PNC is a national computer system which holds details of people, vehicles, crimes and property. It can be electronically accessed by the police and other criminal justice agencies.

Social media

Data provided by forces suggests that the number of investigations into potential misuse of social is increasing (when comparing the nine months of September 2011 to May 2012, with the total for the financial year April 2010 to March 2011).

Monitoring by forces is largely confined to examining and assessing comments and behaviour on their own force-run sites and accounts, such as Facebook pages set up to enable neighbourhood policing teams to engage with and update their local communities.

Only nine forces stated that they had the capacity to check for potential inappropriate behaviour by staff on their personal accounts. Nine forces reported that they were not carrying out any checks on their staff's use of social media.

As we made clear in the 2011 report, the increased use of social media can bring significant benefits: both as an intelligence and investigative tool, and as a means for officers and staff to engage with their communities. However, it can also pose risks, which forces need to understand and manage.

In 2011, independent research commissioned on behalf of HMIC identified potentially inappropriate comments or behaviour on 43 accounts owned by individuals who had identified themselves as members of a police force. This information was fed back to all of the forces through their PSDs. It is disappointing to note that 12 months later, the comments or pictures were still visible to the public on more than three-quarters of these accounts.

For the 2012 revisit, we extended this independent research across all 44 forces (including BTP). We used the same methodology,³⁸ but with a focus on Facebook and Twitter (the two sites in the 2011 review which yielded evidence of potentially inappropriate behaviour).

The latest research identified 1,588 profiles (across all 44 forces) on social media sites belonging to police officers and staff who identified themselves openly as such, compared to the 1,849 profiles across eight forces identified in 2011. There was a significant decrease in the number of identifiable 'police' Facebook profiles compared to 2011 and a corresponding increase in Twitter profiles, reflecting the national growth in the use of Twitter.

A total of 357 instances of potentially inappropriate behaviour were identified, spread across 185 profiles.³⁹ Seventy-one percent (253 instances) of these were found on Twitter. The inappropriate behaviour can be broken down into four categories: offensive language or behaviour (132 instances); comments on police protocol or procedure (119 instances); negativity towards work (70 instances); and extreme opinions on Government (36 instances). All examples of inappropriate behaviour were referred back to the forces to handle as they saw fit.

HMIC recommends that forces and PCCs should assure themselves that there are appropriate mechanisms in place to monitor and manage the reputational risks presented by the inappropriate use of social media.

³⁸ Methodology (including the criteria for 'inappropriate behaviour') is available from the HMIC website (www.hmic.gov.uk).

³⁹ Numbers are not comparable with last year because of the different sample sizes.

Gratuities and hospitality

Data provided by forces show that between September 2011 and May 2012, there were:

- 3,512 *entries made in gratuities and hospitality registers* by police forces, and 112 entries by police authorities. Of these entries, 1,850 relate to gratuities, with the vast majority being low-value gestures of appreciation from members of the public, local businesses and partner agencies. Of the 1,662 register entries relating to hospitality, almost a third (476) were declined. Those accepted were for the most part light refreshments or meals provided at conferences and events.
- 7 *PSD investigations related to gratuities and hospitality*. Three of these resulted in no further action being taken; the rest were resolved through management action.

While in 2011 we found forces with multiple registers for recording gratuities and hospitality (making it difficult to get a complete picture of what was being offered and accepted), by the time of the fieldwork for the revisit 30 forces had consolidated these into a single register. All registers were up to date at the time of the inspection, and there was evidence that they were being checked by the register owner (usually the PSD or ACU).

The data gathered for the 2012 revisit were acquired before the circulation of the revised ACPO guidance on acceptance of gifts and hospitality (which provides clearly that registers should include details both of what was accepted, and what was turned down). Despite this, 33 forces had still kept a record of declined gratuities and hospitality, with such entries representing around a sixth (550) of all entries logged since September 2011. The amount of hospitality recorded and declined, particularly from individuals or organisations that might be more likely to raise concerns about relationships, suggests that the message is getting through about the importance of not creating the perception of a debt owed or undue influence fostered.

There is some evidence that ACUs and PSDs have challenged recipients of hospitality or gratuities if the acceptance appeared inconsistent with the ACPO guidance or force policy. However, there is little evidence of this type of challenge towards chief officers who have received hospitality. While it can be difficult in a hierarchical organisation to challenge those in senior positions, forces should establish systems to monitor and check that all grades and ranks of their workforce are complying with policies on the acceptance of gifts and hospitality.

While we found some evidence of police authority scrutiny of the register, there was little evidence that they were challenging chief officers on their entries. We did however find some good practice in this area: for example, in one force the chief officer team discusses all offers of hospitality as a peer review before making a decision about whether it should be accepted. **HMIC recommends that all forces introduce peer review arrangements for ACPO ranks as one way of judging the propriety of accepting individual offers of gratuities and hospitality, and of assessing how acceptance might be perceived both internally and externally.**

The 2011 report noted that forces would benefit from making better use of the information they already hold in order to identify risks to integrity and target anti-corruption activity. This revisit found the amount of cross-checking of gratuity and hospitality registers against other force documents has increased since 2011 (with 28 forces stating they did some form of this): but this scrutiny

appears to involve checking register entries against easily identifiable providers, to assess whether the gift or hospitality appears excessive or breaches policy (for instance, looking to see if it has been provided by existing contractors or local press). No evidence was found of more intrusive, unannounced integrity checks to test and triangulate register entries against, for example, diary entries and records maintained by the hospitality provider. Similarly, 31 forces are not cross-referencing their hospitality registers with their lists of contractors and prospective suppliers.⁴⁰ More therefore needs to be done to ensure forces are making a comprehensive assessment of the risks to integrity they face. **HMIC recommends that forces establish arrangements for the cross-checking of register entries and the triangulation of events to ensure that any improper behaviour or corrupt activity is more likely to be uncovered.**

Procurement and contracting

A snapshot of data taken at the time of inspection indicates that forces have generally improved their controls over credit and procurement cards, and that the number of cards held reduced by about 100 (compared to the 2011 inspection). Thirty-one forces have systems in place to allocate and control the use of credit and procurement cards. However, as with low-level spend, around a quarter of forces need to improve their controls. Many rely on line managers to check and certify card transactions by staff; the lack of any further corporate checking increases the risk of inconsistency and potential inappropriate card use. In 22 forces, there was no evidence of PSDs routinely and proactively engaging in and reviewing procurement and contract matters. Instead, they become involved only when issues are referred to them for investigation.

Almost two-thirds of forces (28) have taken steps to monitor low-level spend, although some forces still have the limited monitoring mechanisms we found in 2011. However, 16 forces continue to leave monitoring of low-level spend to the discretion of the budget holder, or at a local level. The lack of checks and balances in this area leaves these forces at greater risk of theft and fraud. As in 2011, an issue still exists for a number of these forces where some (generally lower level) spend is being made outside their procurement framework. In the main, forces require staff involved in a tendering or procurement process to self-declare any relevant interests in prospective suppliers. Twenty-three forces do not, however, cross-check records of the business interests and secondary employment of their officers and staff with supplier lists and contracts registers.

Second jobs and business interests

Data provided by forces show that between September 2011 and May 2012, there were:

- 3,858 applications by police officers and staff for secondary business interests. Of these, 3,714 applications were approved (although over a third of these had conditions attached, such as a limit on the number of hours worked), and 103 applications were refused. Five applications had been withdrawn and the remainder were still being reviewed at the time of the data collection.

⁴⁰ It should be noted that since the publication of the 2011 report, there has been a significant decrease in the amount of gratuities and hospitality offered, and accepted, from prospective and current contractors. Those accepted are generally low-value gratuities, or refreshments or a meal at an event or conference.

- 154 investigations into secondary employment by PSDs, compared to 82 for the full year of 2010/11. At the time of the data collection, 41 investigations were continuing, and three had been referred to external bodies for further investigation. Thirty-five of those resolved resulted in no further action, 65 had been resolved through local management advice or warning, and in 10 cases the individual left the force (either resigning, retiring or being dismissed). Eleven forces did not conduct any investigations into secondary employment or business interests over this period.

All forces now have secondary employment and business interest policies for officers and staff. These provide clearer boundaries on what is acceptable as a second job, and allow for more consistent decisions on what applications should be approved (although there are still inconsistencies in the way policies are applied to police staff). At the time of the revisit, over 90% of the secondary employment and business interest policies either were already overseen by PSDs, or were due to be moved across to them (with the rest overseen by HR departments). All forces have second jobs and business interest registers, with some publishing summary versions of these on their intranets: this is transparent, and provides guidance for officers and staff on how the policy is being implemented.

We found evidence that in assessing an application, forces are considering factors such as the applicant's performance at work, welfare issues, and working time directives, with more putting in place conditional approvals (e.g. by putting a limit on the number of hours worked). However, few forces conduct checks to establish if these conditions are being adhered to, or if an unsuccessful application has actually resulted in a person not pursuing the second job or business interest. It is disappointing that there are still many examples of applications being approved despite being in breach of the existing guidance. Since publication of *Without Fear or Favour* (December 2011), these include approvals for 76 applications as drivers, 14 as driving instructors and 31 for police-related skills training.

HMIC found that successful applications for secondary employment are regularly reviewed to ensure that they are still appropriate. However, the frequency of this varies from six-monthly to once every three years, depending on the policing position held by the applicant, and whether there were conditions attached to the original approval of the second job. Consistency should improve significantly with the implementation of the recently adopted ACPO guidance.

HMIC found the best controls in forces where the PSD had force-level oversight of the issue, reviewed existing policies and authorised interests, introduced restrictions where appropriate, and delivered training to staff. In addition, we found good practice in forces which had introduced a review schedule as part of the performance development review (PDR) process, which ensures supervisors are kept aware of existing business interests and any changes in circumstances. **HMIC recommends that forces include in the PDR process for officers and staff a review of any secondary employment and business interests. This should include scrutiny of refused applications and any conditions attached to approved applications.**

Clear boundaries and thresholds: do individuals understand what is expected of them?

Our 2011 recommendation

There should be clear boundaries and thresholds in relation to [integrity issues]. Such limits should be consistent and service wide.

This in effect means identifying a clear message for staff on these issues as to what is acceptable, what is unacceptable and what areas of vulnerability to avoid. ACPO should lead this work in partnership with staff associations and those involved in police governance.

Why we made this recommendation

In 2011, we found that most of the frontline staff we spoke to showed a strong 'moral compass', but that the force policies which detail the boundaries and guidelines on integrity issues such as the acceptance of gifts and hospitality or relationships with the media were generally out of date, poorly communicated and little understood. We noted that integrity should not vary according to geographical location, nor should there be local differences in standards; but our inspection had found evidence of both these things.

What we found in 2012

We used the revisit to establish if forces' policies had been updated, national standards had been developed, and if as a result staff were clear about what they should (and should not) be doing.

National standards and policies

Following the publication of *Without Fear or Favour*, ACPO began developing national guidance for forces on several integrity areas. The aim was to help provide clarity on boundaries and thresholds in order to encourage consistency in approach across the service.

As a result, ACPO developed and circulated the following updated guidance:

- *Interim ACPO Guidance for Relationships with the Media*,⁴¹ circulated in April 2012, which includes reference to recording contact with the media and provides greater clarity on other issues identified in the 2011 report, such as having 'off-the-record' conversations with journalists. All forces

⁴¹ Available from www.acpo.police.uk. This interim guidance will not be finalised until it can take account of the recommendations of the Leveson Inquiry (published 29 November 2012).

had either already approved or were awaiting approval of updated media policies in light of this guidance.

- *Guidelines on the Management of Business Interests and Additional Occupations for Police Officers and Police Staff*,⁴² circulated in June 2012, which clarifies which unit should have overall responsibility for and oversight of force policy, and provides the basis for a consistent approach to the application and appeal process.
- *Guidance On Gifts, Gratuities and Hospitality*,⁴³ circulated June 2012, which recommends that PSDs have force-level oversight of the policy and register, with responsibility for oversight and scrutiny, and for cross-checking entries with other force information to produce a more comprehensive picture of potential risks. It also says that there should be a presumption of non-acceptance of gratuities and hospitality other than light refreshments, and that all offers (both accepted and declined) should be recorded in a single register.

In addition, an early draft of guidelines on the safe use of internet and social media by police officers and staff has been made available to forces (although at time of writing ACPO had not yet formally adopted this). At time of inspection, ACPO was also working to develop and agree an updated version of the 'Statement of Mission and Values for the Police Service',⁴⁴ which should help ensure that integrity considerations are a part of all decision-making processes.

HMIC recommends that PCCs may wish to assess how far their forces have implemented the ACPO national guidance in relation to integrity issues, and how the application of that guidance in force policies and systems supports local anti-corruption strategies.

Force standards and policies

At the time of the revisit, the draft ACPO guidance on gifts and hospitality and on the management of business interests and second jobs had only recently been circulated. Many forces had chosen to wait for this guidance before reviewing, amending, or finalising their policies, and then communicating changes across the organisation and developing training.

With much of the revised ACPO guidance now available (as described above), forces should be in a position to reflect it in their policies and systems. We would therefore expect progress in responding to the 2011 report across the service to be more advanced now than at the time of the fieldwork.

In most forces, HMIC found that guidance on the use of social media for personal and professional purposes was clearer than in 2011. However, four

⁴² Available from www.acpo.police.uk. ACPO Council approval was given to this document on 18 October 2012, placing an expectation upon forces to operate within the guidance framework.

⁴³ ACPO Council approval was given to this document on 18 October 2012, placing an expectation upon forces to operate within the guidance framework.

⁴⁴ The current version is available from www.acpoprofessionaethics.org

forces had not made any reference to the standards of behaviour expected by staff when using personal accounts on social media sites like Twitter and Facebook.

For those areas where ACPO guidance had not been revised, such as information security, most forces had reviewed their policies and procedures to ensure they reflect the considerations and recommendations in *Without Fear or Favour*.

Police authorities

While (as we have noted) forces have made some progress since 2011 in developing internal policies and guidance in respect of integrity issues, there was much less evidence of this in police authorities. The 2012 revisit was in part conceived to provide incoming PCCs with a position statement on the 'integrity health' of their organisations. It is therefore disappointing to note that most authorities, although improving some basic integrity reporting mechanisms, had done little to ensure the standards expected in these areas were clearly articulated and understood in preparation for the arrival of PCCs.

Police awareness of standards, policies and what is expected of them

We held focus groups of frontline staff and supervisors to assess how clearly they understood national and force-level standards around integrity issues, and changes to policies.

- Participants had a clear view of the extent to which it is possible to engage with the media, either on or off duty, and of the requirement to keep a record of contacts with journalists. Most have adopted the approach of referring media requests and press statements directly to the force media team.
- Most stated that they generally understand information security and data protection issues. However, some staff felt that clearer definitions were needed. For example, officers and staff in one force knew that they should only check force information (e.g. by searching the PNC) for a policing purpose, but some were unclear about how they should interpret this phrase.
- They were generally much more aware than in 2011 of the boundaries in relation to the use of social media sites, particularly when at work and using force systems.
- Most staff knew about the requirement to make a record of any gratuity or hospitality offered, and remained very clear and consistent about what was acceptable and what was not, although few had heard about the GIFT mnemonic⁴⁵ (recently adopted as ACPO guidance), and knowledge

⁴⁵ This reminds officers and staff to ask: is the offer Genuine, Independent, Free and Transparent?

of the detail of related policy and procedures was still patchy. For example, staff were uncertain about precisely where the line in relation to accepting basic hospitality should be drawn.

- Few were aware of the details of their force secondary employment and business interest policies, although they knew they existed, and that they had recently been revised. Additionally, in the majority of forces, supervisors did not feel that they would know if their staff had secondary employment or a business interest unless they had handled the application themselves.

Overall, staff we spoke to had a strong 'moral compass', and clearly understood what was expected of them (both by the public and by their forces) in terms of the need for impartiality in their relationships and integrity in their role as members of the police service. However, they were generally unfamiliar with the detail of how to comply with policies.

This links with our finding that while there has been some generic force communication⁴⁶ to promote greater awareness of the main integrity issues or principles, staff were generally unfamiliar with the detail of the policies. We also found little evidence of forces conducting checks to assess levels of knowledge and understanding amongst staff. **HMIC recommends that forces conduct thorough assessments of their workforces' knowledge and understanding of policies relating to integrity issues.**

Publicising the outcomes of misconduct cases within force serves to reiterate the importance of both fully understanding and complying with force policies related to integrity issues. Many staff cited instances of officers and staff in their own force being subject to misconduct proceedings for inappropriate behaviour relating to (for example) social media use. However, we found one force where the practice of publicising this kind of case had stopped on the advice of the HR department, and another where staff had become aware of the conviction of an officer on an integrity-related matter through hearsay rather than any internal force communication.

⁴⁶ Primarily this was email or intranet-based, together with some senior officer-led road shows.

How far have forces and authorities educated their staff to prevent integrity problems occurring?

Our 2011 recommendation

Training courses should include appropriate input in relation to integrity and anti-corruption. In particular, given the importance of leadership to securing high standards of integrity, the Strategic Command Course (in January 2012) and the High Potential Development Scheme should encompass these issues.

Why we made this recommendation

During the 2011 review, we found little evidence of either forces or police authorities providing training for their staff in how to promote integrity and prevent problems. Furthermore, senior leaders had not received any training in relation to preventing, identifying and mitigating integrity issues, nor on what was expected of them as leaders.

What we found in 2012

National training schemes

The most recent Strategic Command Course (SCC) and High Potential Development Scheme (HPDS) entrants now receive some training on integrity issues. However, there is currently no system in place to provide this either to existing chief officers, or to those who have completed the SCC but not yet been promoted, and there are no plans to do so. **Given that integrity issues concerning senior leaders continue to arise, HMIC recommends that investing in integrity training for current and future senior leaders of the service would be a worthwhile investment.**

Forces

The education on integrity issues provided to officers and staff is patchy in most forces, with very limited generic training. Most forces have provided some training to new or newly-promoted staff in non-specialist roles, or conducted role-specific training (such as social media training to neighbourhood staff or media training to family liaison officers).

- As in 2011, while all forces reported providing **media training**, this is often only for senior officers and lead investigators, and covered the mechanics and practicalities of operating as a police spokesperson rather than integrity considerations around relationships with the media. Twenty-four forces stated that they were in the process of reviewing the

media training they provided to staff, although we found most of this to be work in progress.

- All forces either have some form of training on **how to keep information secure** or have conducted awareness campaigns on this, although in three forces there was no evidence of structured training being provided since the 2011 review. At least 23 forces either have or are in the process of introducing computer-based training packages on this issue.
- Four forces have provided training on the appropriate **use of social media** to all officers and staff. Thirty-four forces have either conducted targeted training on this issue to certain groups of staff who are most likely to use social media (such as neighbourhood policing teams and supervisors) and/or have carried out awareness campaigns for other staff using posters, intranet briefings and, in one case, a DVD. The remaining six forces have not carried out any structured training or awareness-raising activity.
- All forces have properly qualified **procurement** staff in place, although at least eight forces acknowledge deficiencies in the training and guidance provided to staff outside procurement teams. These deficiencies include a lack of guidance on procurement rules and regulations, and on the use of corporate credit/charge cards.
- Only six forces have provided well-structured training in relation to **gifts and hospitality**. The other forces cited the preparations for and the policing of the London 2012 Olympics and Paralympics as the main reason for the delay in implementing the ACPO guidance.
- While a number of **PSDs and ACUs** contain staff with formal qualifications in investigation and surveillance, there is very little evidence of dedicated anti-corruption staff receiving specialised training or development since the last review. Members of the PSD and/or ACU have provided targeted training for other staff in only a small number of forces, and even then typically only to selected roles or groups. This demonstrates no significant change since the 2011 review.

Police authorities

We found limited integrity training provided by police authorities to their own members or staff. While there was evidence of some generic communication on integrity issues, this was usually limited to high-level statements rather than detailed policy and procedure.

HMIC acknowledges that police authorities have been occupied with managing the transition to PCCs. However, few have carried out the recommended policy, procedural or governance reviews and updates that would have helped incoming PCCs better understand the risks and challenges they face in respect of integrity issues.

Governance and chief officer example

Our 2011 recommendation

Chief officer teams should review their corporate governance and oversight arrangements to ensure that those arrangements are fulfilling their function of helping promote the values of their forces in the delivery of their objectives, and that they are, through their actions and behaviours, promoting the values of the organisation and making sure good corporate governance is seen as a core part of their everyday business.

Why we made this recommendation

In 2011, very few forces understood where the threats and vulnerabilities to the integrity of their organisations lay, with most seeing the main risks of corruption as being members of staff associating with criminals and (particularly) information disclosure to criminals or friends and family. Only a small number were conducting organisation-wide or targeted work to prevent this.

Despite the SOCA Counter Corruption Threat Assessment providing a national framework that forces could apply locally to understand their own risks and vulnerabilities to target preventative activity, few had done this.

Without Fear or Favour also found that police authority governance arrangements were generally weak and inconsistent (with active support and challenge at one end, and light touch at the other).

What we found in 2012

This section considers the governance arrangements within force, and the role of police authorities, before considering how far chief officer teams are leading by example when it comes to integrity issues.

Governance arrangements within force

We found better understanding than in 2011 of the importance of effective governance and oversight arrangements in helping ensure the integrity of the force. Forces have now put in place mechanisms to assess a wider range of the information they already hold in order to help identify, manage and mitigate risks to integrity and reputation, and have updated or developed procedural guidance. Although some of this was still work in progress, it is worth noting that in 2011 most forces did not even recognise the need for such mechanisms in these areas.

For example, 40 forces now have governance arrangements in place to examine and assess gratuity and hospitality issues. These meetings provide the

forum for discussion of progress against actions recorded in a force integrity action plan, and of checks made against the gratuities and hospitality register. Similarly, all forces demonstrated some governance and oversight of actions taken to ensure information is kept secure.

However, both the extent to which governance arrangements have been strengthened and the rate of progress in reviewing and revising policies vary across forces. For instance: some forces had already put new governance arrangements in place, were implementing action plans to address any areas identified as potentially vulnerable, and were working to finalise and communicate revised policies and training.⁴⁷ In a few forces, however, the process of reviewing and revising policies and governance structures was not progressing with the same degree of urgency.

Similarly, while all forces have carried out integrity 'health checks' to identify their potential weak areas, and are using existing or new meeting structures to manage the resulting action plan,⁴⁸ these structures vary across forces. For example, some include staff association and (until November 2012) police authority representation, while others do not. While forces need to adopt arrangements that best suit their needs, this could mean that some are missing opportunities to increase understanding of integrity issues across different parts of the organisation.⁴⁹ While it is right that staff should look to their senior colleagues to lead by example, integrity is the keystone of policing, and should be central to the work of everyone in the service. As such, every officer and staff member has responsibility for upholding and promoting integrity, and so has a contribution to make.

Some forces are in the midst of significant change programmes aimed at collaborating with other forces in delivering certain services. As part of this process, several are reviewing different policies on, for example, business interests and secondary employment, with the aim of producing a single revised joint policy. This has inevitably been a slower process than it would have been had either force just been revising its own policy. However, we did find that forces working towards a more collaborative approach recognised the need to ensure that appropriate governance arrangements are established with (for example) clarity in relation to how the professional standards function should be shared.

Governance by police authorities

Every police authority should have been checking and challenging how its force manages integrity issues.⁵⁰ HMIC found that little had changed since *Without*

⁴⁷ Although this had in some places been delayed while awaiting national guidance: see pp.27–8 above.

⁴⁸ Importantly, these meetings bring together the key personnel responsible for these areas of business, enabling the senior officer lead for integrity to manage the relationships between these areas.

⁴⁹ The value of involving staff associations was particularly noted in one force, which credited the Police Federation as having been very supportive and also "spreading the word".

⁵⁰ As part of its key statutory duty to "secure the maintenance of an efficient and effective police force in its area". Section 6 of the Police Act 1996 (as amended).

Fear or Favour was published in the way police authorities oversee integrity issues (in either their forces, or their own organisations). Most authorities recorded some increase in the number of reports on integrity issues they received from the forces, and some attended integrity-related meetings in their forces. However, few had made structural or process changes to ensure integrity threats to the force were identified and managed. In particular, police authority governance and oversight of force business interests remains very inconsistent, with few demonstrating any knowledge or understanding of what applications had been made, or of the reviews into whether accepted applications were still suitable.

While it is disappointing to note that the revisit still showed the same inconsistency of oversight as in 2011, we were pleased to note that some police authorities had worked closely with their forces to develop action plans in response to our 2011 report, and had provided real challenge as part of this process (questioning, for example, the scope of force action plans and timetables for implementation of actions). Some had also started to look beyond public complaints and misconduct cases to integrity and corruption issues more widely.

On 22 November 2012, police authorities handed over the democratic oversight of police forces to the newly elected PCCs.⁵¹ The revisit identified that while many police authorities were receiving update reports in relation to some or all integrity issues, their focus was more on developing and managing the transition and handover to PCCs, rather than necessarily improving governance arrangements in these areas specifically. HMIC found that other than routine reports to committees, there was little evidence of police authorities having assessed or adjusted their governance regimes to ensure incoming PCCs were as well positioned as possible to understand and scrutinise (for instance) gratuity and hospitality or business interest issues.

The PCCs come from a variety of backgrounds and although some have a degree of previous policing experience, not all do. This presents a significant risk that in an unfamiliar environment, without a robust integrity governance structure, some PCCs may not be sufficiently well briefed on these matters to identify and manage any threats and provide effective challenge to their forces.

Governance within police authorities

Police authorities' approaches to their own internal governance arrangements to ensure integrity also varied considerably. Some had revised their policies (for instance, on acceptance of gifts and hospitality) in the light of our 2011 report, or adopted the relevant policies as updated by their forces; but others appeared to have taken little or no action to review and revise policies.

⁵¹ Section 6 of the Police Reform and Social Responsibility Act 2011 states that "the police and crime commissioner for a police area must (a) secure the maintenance of the police force for that area, and (b) secure that the police force is efficient and effective."

Chief officer team example

As noted in *Without Fear or Favour*, good governance is more than systems and processes. It requires those in charge of an organisation to lead by example, demonstrating appropriate behaviour and promoting force values in pursuit of its objectives. While in 2011 we found some evidence of the promotion of values by senior officers, this was not universal and, although most forces had made changes to oversight arrangements and put effort into communicating integrity messages through a variety of means, there is more to be done. For example, it is clear from some of the focus groups held as part of the revisit that not all officers and staff were clear about which senior officer was the lead for integrity in their force.

Disappointingly, a small number of examples of senior leaders breaching policies relating to integrity issues such as acceptance of gifts and hospitality are still evident. Combined with the finding that there was little evidence of internal challenge to chief officers on integrity issues (see p.24 above), this points to the need for a more transparent and challenging environment. If this existed, it would be a good indicator of organisational health across the service.

Conclusions and recommendations

The possession, development and consistent practice of high standards of professional and personal probity is fundamental to the core values of the police and what it means to be a police officer. The 2011 report should have added impetus to force and authority work to identify, monitor and manage integrity issues. HMIC therefore expected to find evidence of forces and authorities making good progress against the report recommendations. The continued high profile of police corruption stories in the media over the last year, and the need to assure the public that these integrity issues are being addressed, should have brought this into still sharper focus.

HMIC found evidence of some good work by forces, particularly in relation to the establishment of processes and policies to manage threats to integrity in police relationships. This has been supported by the development of national ACPO guidance on several integrity issues (such as the acceptance of gifts and hospitality, and the conduct of relationships with the media). However, while we acknowledge that many forces were waiting for this national guidance to be in place before updating and circulating their own policies, we still consider that overall progress against the recommendations has been patchy and inconsistent, and has lacked an appropriate degree of urgency.

Nor did we find that police authorities in general worked to tackle the weaknesses in their own governance identified in the 2011 report. This means that not all authorities were able to provide PCCs with comprehensive and up-to-date information on current integrity issues in their forces, which exposes their successors to appreciable risk.

We therefore conclude that more needs to be done by the service, and with a greater sense of urgency, if the public is to have confidence that it takes integrity matters seriously and is gripping them effectively. High-profile cases of alleged police corruption, other criminal behaviour and misconduct have had a detrimental effect on the reputation of the service. This has implications not only for the effectiveness of police activity in fighting crime (which requires public engagement and involvement based on trust), but also ultimately for the very legitimacy of a public service many wish to hold in high regard.

In a policing model based on consent, the effects of any loss of public trust in the service should not be underestimated. As the Home Office 'Guidance on Standards of Professional Behaviour' states:⁵²

"Public confidence in the police is crucial in a system that rests on the principle of policing by consent. Public confidence in the police depends on police officers demonstrating the highest levels of personal and professional standards of behaviour."

⁵² This forms Chapter 1 of Home Office (2008) *Guidance on police unsatisfactory performance and misconduct procedures*. Home Office circular 026 / 2008. Available from www.homeoffice.gov.uk

The cumulative effect of individual cases that raise concerns about police integrity, whether justified or not, can also serve to diminish the achievements of the service as a whole and the contribution of the very many hardworking and dedicated officers and staff who carry out their duties with high integrity and serve their communities well.

These officers and staff deserve to be led by example. Unfortunately, although this was not a leadership review, we found that some senior officers have not met the high standards that their forces and the public have a right to expect of them. PCCs have the primary responsibility for holding their chief officers to account; but we believe that there continues to be a need for external independent scrutiny of integrity issues more widely by HMIC. This should include unannounced inspections, the results of which should (wherever appropriate) be made public.

Against this background, the service needs to demonstrate that it is gripping the issues, and putting renewed effort into strengthening governance and oversight arrangements to embed and promote high standards of integrity in all that it does.

Key recommendations

- **The evidence shows that progress is inconsistent across forces and more needs to be done with a greater sense of urgency if the public is to have confidence that the service takes integrity matters seriously and is gripping them effectively. Therefore, in addition to scrutiny of chief officers by PCCs, there continues to be a need for independent external scrutiny by HMIC, including unannounced inspections.**
- **There is little evidence of force professional standards departments checking and challenging chief officers in connection with issues of integrity. A more transparent and challenging environment needs to be created. PCCs should assure themselves that their forces are nurturing such environments with effective internal scrutiny and challenge.**
- **More robust and auditable corporate governance arrangements are required if the new accountability arrangements are to work effectively. These need to differentiate clearly the roles and responsibilities of chief officers and PCCs.**
- **The College of Policing should quickly develop sound professional standards for training and development in connection with issues of integrity.**

Next steps

Previously, HMIC would have directed recommendations about governance and other related matters to police authorities. Since police authorities ceased to exist in November 2012, HMIC will now seek to ensure that PCCs are fully informed about improvements needed in the corporate governance arrangements they have inherited.

HMIC is particularly concerned about the pace of the service's progress in responding to the issues raised in *Without Fear or Favour*. We also consider that the service is not yet able to provide the evidence needed to give us or the public confidence that it is gripping these issues effectively. HMIC will therefore continue to inspect integrity issues as part of our programme of inspection of forces, including through unannounced inspections. The results of this inspection activity will be communicated to forces and PCCs, and (wherever appropriate) published on the HMIC website (www.hmic.gov.uk).

Annex A: Complete list of recommendations arising from the 2012 report

- The evidence shows that progress is inconsistent across forces and more needs to be done with a greater sense of urgency if the public is to have confidence that the service takes integrity matters seriously and is gripping them effectively. Therefore, in addition to scrutiny of chief officers by PCCs, there continues to be a need for independent external scrutiny by HMIC, including unannounced inspections.
- There is little evidence of force professional standards departments checking and challenging chief officers in connection with issues of integrity. A more transparent and challenging environment needs to be created. PCCs should assure themselves that their forces are nurturing such environments with effective internal scrutiny and challenge.
- More robust and auditable corporate governance arrangements are required if the new accountability arrangements are to work effectively. These need to differentiate clearly the roles and responsibilities of chief officers and PCCs.
- The College of Policing should quickly develop sound professional standards for training and development in connection with issues of integrity.
- As more forces consider outsourcing elements of their work, the service should reach agreement on the role of forces in the investigation and enforcement of unacceptable behaviour by staff in outsourced services, with a view to producing national guidance to help forces identify and manage the potential risks to their reputations in this respect.
- Forces and PCCs should assure themselves that there are appropriate mechanisms in place to monitor and manage the reputational risks presented by the inappropriate use of social media.
- All forces should introduce peer review arrangements for ACPO ranks as one way of judging the propriety of accepting individual offers of gratuities and hospitality, and of assessing how acceptance might be perceived both internally and externally.
- Forces should establish arrangements for the cross-checking of register entries and the triangulation of events to ensure that any improper behaviour or corrupt activity is more likely to be uncovered.
- Forces should include in the PDR process for officers and staff a review of any secondary employment and business interests. This should include scrutiny of refused applications and any conditions attached to approved applications.

- PCCs may wish to assess how far their forces have implemented the ACPO national guidance in relation to integrity issues, and how the application of that guidance in force policies and systems supports local anti-corruption strategies.
- Forces should conduct thorough assessments of their workforces' knowledge and understanding of policies relating to integrity issues.
- Given that integrity issues concerning senior leaders continue to arise, HMIC recommends that investing in integrity training for current and future senior leaders of the service would be a worthwhile investment.