



Inspecting policing
in the public interest

**Revisiting police
relationships:
progress report**

**Thames Valley Police
December 2012**

About this review

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

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

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

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

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

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

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

Findings for Thames Valley

Since 2011 Thames Valley Police has conducted an integrity “healthcheck”, using the Self-Assessment Checklist provided in HMIC’s 2011 report, *Without Fear or Favour*. We found that there have been clear improvements in the way the force manages integrity issues and how different departments communicate with each other to reduce risks, in particular through the integrity subgroup. The force has also updated most of its policies on relationships with the media, acceptance of gifts and hospitality, use of social media, and police officers and staff having second jobs. Officers and staff are clearer on what is expected of them in these areas, and are declaring and recording more information about second jobs and offers of gifts.

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

The force has produced a new media engagement policy, which outlines how relationships with the press should work and how staff should record contact with journalists. The policy has been widely circulated and the force is planning to raise staff awareness further through local briefings. Training has been given to staff and officers who are most likely to come into contact with the media.

The media team flags up any suspected media leaks or inappropriate disclosure of information. Daily checks are carried out on force approved Twitter accounts, but scanning does not extend beyond this to other social networking sites.

The force has reviewed how it can be more proactive in monitoring and investigating inappropriate disclosure of information, including leaks to the media. Between September 2011 and May 2012, the force has investigated three instances of inappropriate disclosures to the media, one of which was continuing at the time of our inspection.

The force has introduced new social media guidance which sets out the boundaries for staff, stating what is and is not acceptable in their personal use of networks such as Facebook and Twitter. This has been publicised in a number of ways, such as through briefings and emails. Staff interviewed during the inspection understood the risks associated with using these sites: however the guidance could be clearer and more widely distributed. Staff had a better understanding of their responsibilities when using social networking for force business. HMIC’s independently commissioned research identified seven cases of potentially inappropriate behaviour on Facebook or Twitter by Thames Valley Police officers or members of staff. These have been referred back to the force.

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

Whereas previously staff only had to disclose and record **gifts and hospitality** worth £15 or more, new guidance states that everything should be logged. However, we found that most staff did not know about these changes (although they were aware of what gifts and hospitality it would be inappropriate to accept).

Thames Valley Police now has a single register for recording gifts and gratuities (both accepted and declined). This is owned and maintained by the Professional Standards Department (PSD), and replaces the multiple registers we found in 2011. The force publishes this information on its website.

The head of procurement is a member of the integrity subgroup, which brings relevant heads of department together to provide monitoring and oversight of force procurement and finance. The head of **procurement** also meets with the heads of PSD and corporate communications every three months, to cross-check the gifts and hospitality register with the list of contractors and discuss any potential integrity issues this reveals (for instance, if a company provides hospitality and is then offered a contract).

Thames Valley Police's policy for **second jobs** and business interests applies to police staff as well as police officers, and Human Resources (HR) holds a register of all the applications made. The force has recently transferred responsibility for business interests to PSD and the head of PSD is now the decision maker. There are strong links between HR and PSD to ensure that every decision to approve or refuse an application to take up a second job is based on assessments of the risks to the force and the suitability of the applicant, including a consideration of how they are performing in their policing role. All approved applications are reviewed on an annual basis to make sure they are still appropriate, and refused applications are discussed at the integrity subgroup, to ensure the policy is being applied consistently. Since September 2011 there have been 129 applications for second jobs, with all but one being approved.

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

Since the 2011 inspection visit, Thames Valley Police has put in place stronger governance arrangements to identify and monitor integrity issues, in particular through the newly formed integrity subgroup. This ensures that all the relevant heads of department have the opportunity to identify the key risks to the force's integrity, determine what actions need to be taken as a result, and monitor progress against these actions. The recently elected PCC will need to ensure they are satisfied with their governance and reporting mechanisms for these issues.

Data provided by the force to HMIC shows that there has been a reduction in the number of staff working in the anti-corruption unit since our 2011 inspection. The force instigated 59 investigations between September 2011 and May 2012 into the conduct of its officers and staff in relation to the areas covered by this report.

Thames Valley Police has provided training on integrity issues since 2011, including some specifically targeted at staff who may need to speak with the media as part of their job. Changes to policy and new guidance are communicated via email and through the force intranet, but there is no mechanism to check that officers and staff have understood them.

Next steps

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

