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# Police Integrity and Corruption

Avon and Somerset Constabulary

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# Contents

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To what extent has the force put in place arrangements to ensure its workforce acts with integrity?	4
The force in numbers	7
Introduction	10
What progress has the force made on managing professional and personal relationships with integrity and transparency since HMIC's December 2012 report?	11
What progress has the force made in communicating and embedding ethical and professional behaviour to all staff, including the new Code of Ethics?	14
How well does the force proactively look for, and effectively challenge and investigate misconduct and unprofessional behaviour?	18
How well does the force prevent, identify and investigate corruption?	22
Recommendations	25

## To what extent has the force put in place arrangements to ensure its workforce acts with integrity?

Avon and Somerset Constabulary has made some progress in communicating the need for ethical and professional behaviour and has made good progress in relation to the areas for improvement identified by HMIC in 2012. It has an effective approach to the management of misconduct matters; however, the constabulary does not manage the threat, risk and harm from corruption as effectively as it should.

### Summary

Avon and Somerset Constabulary has started to make progress in communicating ethical and professional behaviour across the constabulary. There is evidence of leadership from the temporary chief constable, demonstrated by his personal video message that introduced the Code of Ethics in order to encourage ethical behaviour and empower staff to challenge unprofessional behaviour. Officers and staff are aware of the boundaries of unprofessional and professional behaviour, and understand how each affects both the public and their colleagues.

The constabulary had eight areas for improvement (AFIs) from the HMIC 2012 inspection and has responded well to these. HMIC found that policies and working practices are in place to ensure integrity through officers' declarations of business interests and notifiable associations.

The constabulary publishes data and information on the freedom of information section of its website in relation to the gifts and hospitality register. This covers all chief officers, and includes both accepted and rejected offers.

The constabulary needs to do more to understand and manage the threat, risk and harm from corruption effectively. However, the head of the counter-corruption unit (CCU) has completed an integrity action plan, based on the national and regional counter-corruption threat assessments, and has identified some measures to be completed. A lack of capacity has meant that this has not been progressed. The intelligence function within the unit has little capacity proactively to identify vulnerable individuals and groups.

**What progress has the constabulary made on managing professional and personal relationships with integrity and transparency, since HMIC's December 2012 report?**

In 2012, HMIC identified eight areas for improvement (AFIs).

Policy and control measures with regard to contact with the media have been improved.

Proactive monitoring of social media is still limited.

The gifts and hospitality policy has been enhanced.

Procurement processes have now been outsourced to a private company as part of a local collaborative arrangement.

**What progress has the constabulary made in communicating and making sure staff knew about ethical and professional behaviour to all staff, including the new Code of Ethics?**

The constabulary is making some progress in embedding professional behaviour, and chief officer leadership is evident.

The need for ethical behaviour has been incorporated into some but not all policies and no ethical audits are undertaken.

Integrity issues are monitored by chief officers, but not in a way that allows them to fully understand the issues.

**How well does the constabulary proactively look for, and effectively challenge and investigate misconduct and unprofessional behaviour?**

There are good confidential reporting mechanisms. HMIC spoke to a cross-section of staff in focus groups who reported that they would be supported if they reported misconduct.

The constabulary publishes data and information on the freedom of information section of their website in relation to the gifts and hospitality register.

Rejected business interest applications are not proactively monitored by the CCU.

**How well does the constabulary prevent, identify and investigate corruption?**

The constabulary does not manage threat, risk and harm from corruption as part of a formal governance structure.

The constabulary regularly, but not proactively, gathers actionable intelligence on corruption.

Officers and staff working on organised crime group (OCG) operations are routinely checked by the CCU to ensure that they are not vulnerable to corrupt approaches.

**What progress has the constabulary made on managing professional and personal relationships with integrity and transparency, since HMIC's December 2012 report?**

Business interest decisions do not currently include police staff and the counter-corruption unit (CCU) is not involved in the process.

The police and crime commissioner (PCC) is now provided with sufficient information to ensure effective oversight of professional standards matters.

The CCU remains under-resourced but plans are in place to increase capacity.

Good integrity training plans have been established with the 'Shine' programme and the Code of Ethics implementation.

**What progress has the constabulary made in communicating and making sure staff knew about ethical and professional behaviour to all staff, including the new Code of Ethics?**

Officers and staff are aware of the ethical and professional boundaries of behaviour required and the professional standards department (PSD) regularly gives presentations to new and existing officers and staff on standards required.

**How well does the constabulary proactively look for, and effectively challenge and investigate misconduct and unprofessional behaviour?**

The PCC has recently established an independent group from outside the police service to review completed PSD case files to provide independent audit.

**How well does the constabulary prevent, identify and investigate corruption?**

The CCU is predominantly a reactive department, carrying out only limited proactive analysis. However, this has been recognised by the constabulary and plans are in place to address the issue.

The head of the CCU has completed an integrity action plan, based on the national and regional counter-corruption threat assessments, identifying what action needs to be taken.

# The force/constabulary in numbers



## Complaints

Total public complaints against officers and staff,  
12 months to March 2014

**1124**

Total public complaints against officers and staff,  
12 months to March 2014, per 100 workforce

**22.5**

Total public complaints against officers and staff,  
per 100 workforce – **England and Wales**

**15.7**



## Conduct

Total conduct cases against officers and staff,  
12 months to March 2014

**134**

Total conduct cases against officers and staff,  
12 months to March 2014, per 100 workforce

**2.7**

Total conduct cases against officers and staff,  
per 100 workforce – **England and Wales**

**2.6**



## Business interests

Applications in 12 months  
to March 2014

**75**

Approvals in 12 months  
to March 2014

**71**



## Resources

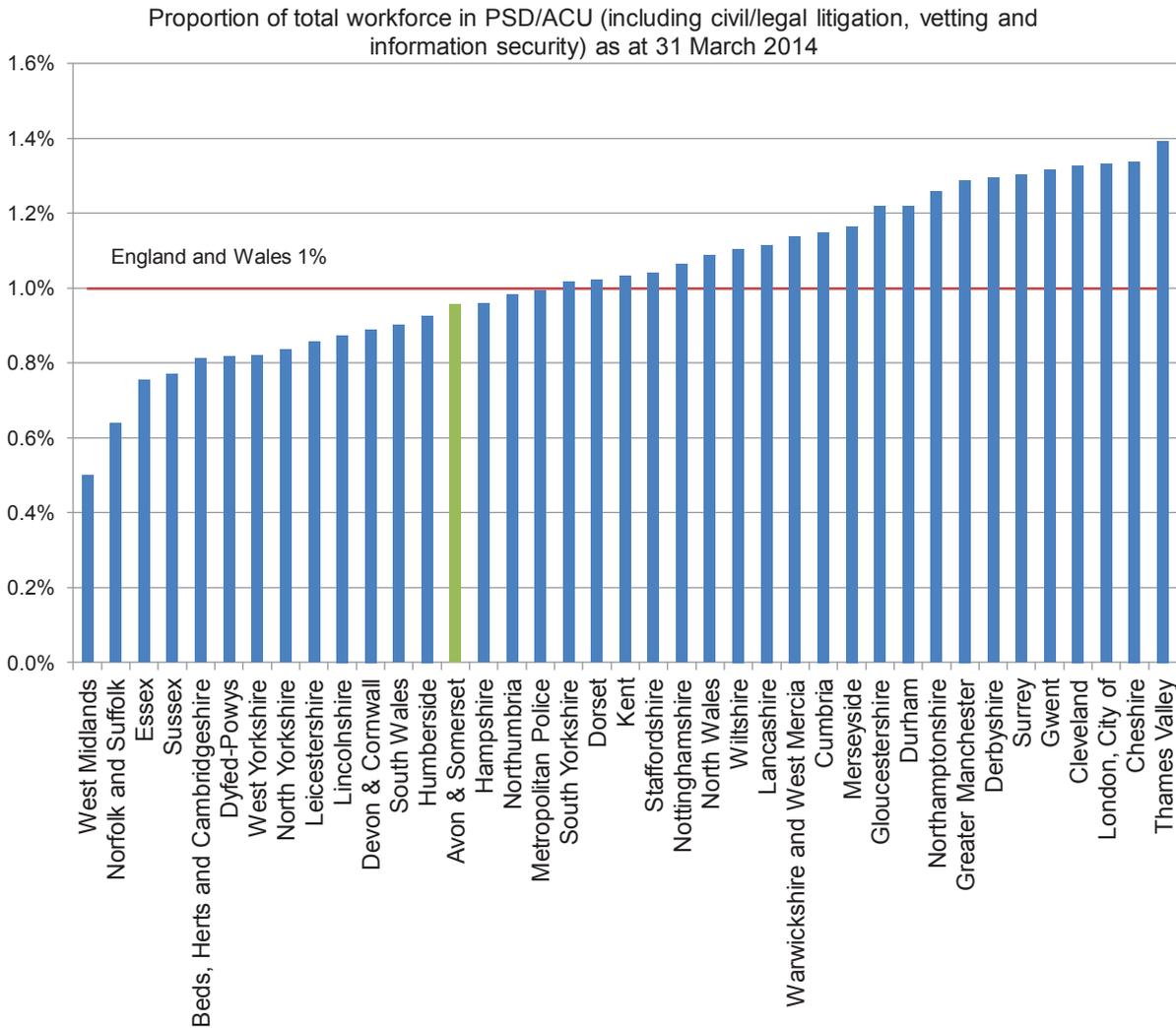
Proportion of workforce in  
PSD/ACU

**1.0%**

Proportion of workforce in  
PSD/ACU  
– England and Wales

**1.0%**

Information above is sourced from data collections returned by forces, and therefore may not fully reconcile with inspection findings as detailed in the body of the report.



The chart above is only indicative of the proportion of force’s workforce that worked in professional standards or anti-corruption roles as at the 31 March 2014. The proportion includes civil/legal litigation, vetting and information security. Some forces share these roles with staff being employed in one force to undertake the work of another force. For these forces it can give the appearance of a large proportion in the force conducting the work and a small proportion in the force having the work conducted for them.

## Introduction

During HMIC's review of police relationships, published in 2011 as *Without fear or favour*<sup>1</sup>, we did not find evidence to support previous concerns that inappropriate police relationships represented endemic failings in police integrity. However, HMIC did not give the police service a clean bill of health. We found that few forces were actively aware of, or were managing, issues of police integrity. We also found a wide variation across the service in the levels of understanding of the boundaries in police relationships with others, including the media. Similarly, we found wide variation across the service in the use of checking mechanisms, and governance and oversight of police relationships.

During HMIC's 2012 progress report, *Revisiting police relationships*<sup>2</sup>, we found that, while forces had made some progress, particularly with regard to the implementation of processes and policies to manage threats to integrity, more needed to be done. The pace of change also needed to increase, not least to demonstrate to the public that the police service was serious about managing integrity issues.

This inspection focuses on the arrangements in place to ensure those working in police forces act with integrity. Specifically, we looked at four principal areas:

- (1) What progress has been made on managing professional and personal relationships since our revisit in 2012?
- (2) What progress has the force made in communicating and embedding ethical and professional behaviour to all staff?
- (3) How well does the force proactively look for, and effectively challenge and investigate misconduct and unprofessional behaviour?
- (4) How well does the force prevent, identify and investigate corruption?

In May 2014, the College of Policing published a Code of Ethics for the police service<sup>3</sup>. As our inspections in forces started in early June 2014, it is unrealistic to expect that, at the time of the inspection, forces would have developed a full, comprehensive plan to embed the code into policies and procedures. We acknowledge that this is work in progress for forces and our inspection examined whether they had started to develop those plans.

A national report on police integrity and corruption will be available at [www.justiceinspectorates.gov.uk/hmic/](http://www.justiceinspectorates.gov.uk/hmic/) in early 2015.

1 *Without fear or favour: A Review of Police Relationships*, HMIC, London, December 2011. Available from [www.justiceinspectorates.gov.uk/hmic/media/a-review-of-police-relationships-20111213.pdf](http://www.justiceinspectorates.gov.uk/hmic/media/a-review-of-police-relationships-20111213.pdf)

2 *Revisiting police relationships: A Progress Report*, HMIC, London, December 2012. Available from <http://www.justiceinspectorates.gov.uk/hmic/media/revisiting-police-relationships.pdf>

3 *Code of Ethics – A Code of Practice for the Principles and Standards of Professional Behaviour for the Policing Profession of England and Wales*, College of Policing, Coventry, July 2014. Available at <http://www.college.police.uk>

# What progress has the force made on managing professional and personal relationships with integrity and transparency since HMIC's December 2012 report?

HMIC highlighted eight areas for improvement (AFIs) from the 2012 inspection report:

## 1. The investigation of reports of inappropriate disclosure to the media

Avon and Somerset Constabulary has made good progress in this respect. HMIC found that the constabulary has policy and controls in place that allow for monitoring of the use of the constabulary's official social media sites by its staff. This policy also controls the number of staff who are authorised to speak with the press, and directs that such contact is recorded. Two staff have declared links with journalists as part of the notifiable associations process, and they have been given appropriate advice around managing those relationships.

Although there have been three incidents of inappropriate disclosure of photographs to the media since 2012, these were later identified as administrative errors. There have been no findings of unethical or inappropriate disclosure following HMIC's 2012 report, and the six breaches mentioned in the 2012 report as being under investigation were not proven to be of concern.

## 2. The development of guidance and monitoring of staff use of social media

The constabulary has made limited progress in this respect. There is a documented policy on the use of the internet and social media, including advice on security settings. The constabulary will investigate any reports of inappropriate use of personal social media accounts by officers and staff. However, there is no proactive monitoring of the personal use of social media by the constabulary.

## 3. Clarity on records of acceptance of gifts and hospitality is required

The constabulary has made good progress in this respect. There is now a consistent template for recording gifts and hospitality with local registers being collated quarterly and reviewed by the counter-corruption unit (CCU). The information includes the nature of the gift or hospitality, the rationale for its acceptance and details of the supervisory officer who authorised its acceptance. A check of the register showed that more accepted offers of hospitality are shown than declined offers. Reality testing identified a high level of awareness among officers and staff of the need to record accepted gifts or hospitality, but less awareness of the requirement to record those offered but declined. The police and crime commissioner (PCC) has oversight of chief officers' declared gifts and hospitality, and details of these are published on the constabulary website.

#### 4. Monitoring of expenditure on constabulary procurement cards and the procurement process

The constabulary has made good progress in this respect. The head of procurement is responsible for overseeing the use of constabulary credit cards and procurement cards. He monitors usage in accordance with the strict policy governing which members of staff can make purchases using this facility. HMIC is satisfied that this process is appropriate and there has been an internal audit of purchasing cards that supports this view.

The constabulary now uses an independent private company, South West One, to manage its procurement processes. This arrangement provides some protection for the constabulary in ensuring the integrity of the procurement process. The system has clearly defined authorisation and approval levels for any purchases from approved contractors and suppliers. There is an internal and external audit to ensure the process is robust.

#### 5. Development of the process for authorising and monitoring business interests

The constabulary has made some progress in this respect. There is a formal authorisation and review process for business interests for police officers and this is in the process of being extended to police staff. The list of authorised business interests is formally published on the constabulary's website.

Although the head of the professional standards department (PSD) makes the approval decision, the CCU is not currently involved in the approval process and no check is made of its intelligence databases to ensure that there is no adverse information to indicate the application should be refused. In addition, there is no proactive work to ensure that business interests that have been refused are not being carried out without authorisation. Reality testing highlighted that line managers and the senior leadership team do not have an awareness of existing business interests on their commands, and are only able to identify recent applications when they have been personally involved in the approvals process.

#### 6. Planning, prioritising and oversight of integrity issues by the police and crime commissioner

The constabulary has made good progress in this respect. The inspection found that chief officers provide information to the PCC to enable governance and accountability on integrity issues, including misconduct and unprofessional behaviour. The PCC has recently established a group to provide independent scrutiny of concluded case files.

#### 7. Staffing levels within the counter-corruption unit

The constabulary has made limited progress in this respect. It has identified that there is a lack of proactive work within the CCU, due to insufficient staff levels. A further two officer posts have been approved in order to provide this capability.

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## 8. Training on integrity issues

The constabulary has made good progress in this respect. HMIC found that newly appointed police officers, special constables and new police staff members meet with staff from the CCU and receive a presentation that sets out the standards required of them. There is also a range of accessible policy documentation that gives guidance to staff on what is required.

# What progress has the force made in communicating and embedding ethical and professional behaviour to all staff, including the new Code of Ethics?

## Leadership and governance

Some progress has been made in embedding ethical and professional behaviour across Avon and Somerset Constabulary. There is evidence of leadership from the acting chief constable, demonstrated, for example, by his personal video message introducing the new Code of Ethics.

Officers and staff are aware of the boundaries of professional behaviour and understand how their conduct affects both the public and their colleagues. This was demonstrated through discussions with staff, some of whom have received presentations from the professional standards department (PSD) to reinforce expectations. HMIC found that staff understand the standards expected of them and that misconduct will be rigorously investigated. The investigation of the chief constable has had the effect of raising these issues in the minds of staff.

Ethical and professional behaviour has been incorporated into some, but not all, policies and procedures. HMIC found that most policies are within their review date. However, the detective inspector within the counter-corruption unit (CCU), who has responsibility for updating policy, acknowledges the need to review some policies that are no longer current, such as the drugs and alcohol policy, the policy on the use and monitoring by the PSD of constabulary systems, and the confidential reporting policy.

The constabulary acknowledges that audits of databases relating to ethical issues are not undertaken by the PSD because of current workloads within the department. The constabulary is in the process of increasing the staffing in the PSD by 30 percent and intends to begin that process thereafter.

## Recommendation

**Within six months, the force should ensure that it carries out regular audits of integrity-related registers including gifts and hospitality, business interests, notifiable associations, expense claims, procurement activity and other records to identify potentially corrupt activity.**

There is evidence that most leaders, including first-line supervisors, lead by example, demonstrate their personal commitment to ethical behaviour, and promote and encourage ethical behaviour. To some extent, they check the understanding of their staff as to what is expected of them in their professional and private life during normal interactions.

The results of the constabulary's 2013 staff survey strongly indicate that line managers demonstrate the organisation's values: 77.1 percent of those responding agreed and only 8.9 percent disagreed. For the senior leadership team, the results were fairly strong (64.1 percent agreed and 12.7 percent disagreed), and for the chief officer group slightly less so, although a higher number were neutral: 58.2 percent agreed and 11.7 percent disagreed. The constabulary has just introduced the 'Shine' programme, which aims to further improve leadership across the constabulary. One of the three areas of the 'Shine' programme is titled 'authentic' and promotes 'living by the force values'. This includes a focus on integrity and ethical behaviour.

HMIC found there was evidence to suggest that unethical and unprofessional behaviour are appropriately challenged within the constabulary. Numerous examples were provided to demonstrate that this takes place, both through investigations into public complaints and internal investigations conducted by the CCU. The constabulary has identified that challenging the behaviour of more senior staff may be more difficult than challenging the behaviour of colleagues. The constabulary has a policy that the victim or reporter of wrongdoing will not be moved to another role or area, unless it is at his or her request. HMIC found that, during reality testing on divisions and focus groups, staff interviewed confirmed that challenging senior officers would be more difficult; however, they said they would report misconduct and felt they would be supported.

The constabulary has plans to communicate and embed the new Code of Ethics. Responsibility has been allocated to a project lead superintendent who has devised an initial action plan. The Code of Ethics is viewed as a corporate responsibility rather than just the responsibility of the PSD. Staff spoken to by HMIC felt the constabulary already adheres to these ethical standards.

There is a clear policy on notifiable associations outlining the obligation to declare any change in circumstances in an officer's or staff member's personal associations and relationships, which includes advice on management of any risk. Officers and staff members are generally aware of their obligations in this regard, although some consider that their personal life is private and not the concern of the organisation. The geography of the constabulary means that many police their own communities. The notifiable associations register is managed by the CCU, and actions to mitigate risk appear proportionate with notifications being reviewed and acted on appropriately. Briefing on notifiable associations is not delivered to all staff, although it is part of the presentation to new staff on joining.

The National Decision Model (NDM) is in use at some levels in the constabulary, mainly in those specialist roles to which it is most applicable. It is an element of the personal safety training for operational officers. Officers and staff to whom HMIC spoke outside the relevant specialists did not fully understand the values and ethics element of the model when taking decisions.

Training on ethical and professional behaviour is delivered to all staff but not regularly, and staff understanding is not checked. The PSD meet with new recruits and front-line staff at the point of induction, and has delivered training to a number of detective officers and specialists. The training does not include training on unconscious bias, although it does include some aspects of recognising ethical dilemmas. The 'Shine' leadership programme and the implementation of the Code of Ethics provide further opportunities for training in this respect.

Chief officer leadership on integrity issues, including misconduct and unprofessional behaviour, is visible and recognised by staff with clear messages; encouragement of positive behaviour; and explanations on the boundaries of acceptable behaviour. At the time of the HMIC inspection, the constabulary was undergoing a complete reorganisation, which was at the forefront of the minds of staff and featured heavily in constabulary-wide chief officer communications. Throughout this process, we found evidence that staff continued to be aware of the need for professional and ethical behaviour, and that this necessity to do so formed part of the chief officer messages.

The inspection found that chief officers provide information to the police and crime commissioner (PCC) to enable governance and accountability on integrity issues, including misconduct and unprofessional behaviour. The head of the PSD has a fortnightly meeting with the office of the police and crime commissioner (OPCC) on public complaints and internal matters. This is a formal and minuted meeting. The PCC has recently established a group from members of the public to provide independent scrutiny of concluded PSD case files.

Integrity issues, including misconduct and unprofessional behaviour, are monitored by chief officers at general high-level prioritising and planning meetings, but not in a focused way that allows them to fully understand the issues, and identify the need for certain activity. The temporary chief constable holds the head of the PSD to account at one-to-one meetings, and maintains oversight of ongoing investigations. The constabulary produces and publishes a performance report for the PSD. The PSD's performance is reviewed at the constabulary's quarterly performance meetings. However, there is no overall planning and prioritising board with responsibility for professional standards and wider integrity issues. In addition, there is currently little formal evaluation or profiling of common misconduct issues and high-risk areas. This is an area that requires improvement, and the implementation of the Code of Ethics provides an opportunity to establish such a governance forum.

## Understanding integrity

Some work has been carried out by the constabulary (via surveys of officers and staff, the general public and youth groups) to understand how integrity issues, including misconduct and unprofessional behaviour, affect public trust. The constabulary undertook a staff survey in 2013. It also conducted a youth survey in 2013. One of the questions was: 'If you don't feel confident in the police, why not?' The constabulary conducts victim surveys but there is no specific questioning on integrity and trust.

Details of most occasions in which officers and staff are offered gifts or hospitality are recorded fully in a centrally held repository (including cases in which the gift or hospitality is not accepted), and they are audited regularly. The constabulary has a clear documented policy in this respect, and all staff spoken to by HMIC understood the requirements to record accepted offers – although some were more likely to record accepted offers than those that were declined. Each division or department has its own register and supervisors endorse the register to indicate their awareness of, and support for, the decision. Those registered are collated centrally by the CCU to ensure consistency of approach and to challenge where applicable.

Details of all occasions in which officers have applied for authorisation for a business interest are recorded fully by the constabulary in a centrally held repository within the PSD, including cases in which the application has not been authorised. The head of PSD makes the final decision as to whether to allow a business interest, but at present the CCU is not part of the approval process and its intelligence records are not checked for any information relevant to the decision. Authorised applications are not formally reviewed on an annual or routine basis when relevant staff are sick or there is an underperformance issue. Line managers and divisional commanders are not fully aware of the business interests of their staff, unless they are personally involved in the approval process. Formally rejected business interest applications within the constabulary are not currently followed up by the CCU to ensure compliance, unless there is a specific intelligence report on the subject.

The constabulary's business interests and secondary employment policy does not specifically make mention of voluntary work (for example, school governorship). There is no guidance on what is to happen should the constabulary consider the position to be incompatible. Discussions with staff indicate that they are not entirely clear about what types of voluntary work they should notify the force about and the process for doing so. The constabulary should review this aspect of policy and provide explicit guidance within the business interests and secondary employment policy.

## How well does the force proactively look for, and effectively challenge and investigate misconduct and unprofessional behaviour?

### Misconduct and unprofessional behaviour

Misconduct and unprofessional behaviour are considered in decision making about transfer to specialist roles and promotion for all positions. The counter-corruption unit (CCU) is also asked to provide any intelligence for promotion processes, and there is a formal vetting process for high-risk specialist roles.

The constabulary tries to ensure that all staff, irrespective of rank or role, are treated fairly and equally in terms of how investigations are assessed, recorded and investigated, and sanctions imposed. There is ongoing scrutiny of investigations by the senior managers within the professional standards department (PSD), and structured processes for recording and investigation are followed. The head of the PSD makes all decisions in respect of cases and this provides consistency. He has a monthly meeting with the head of human resources (HR) to ensure consistency in the way in which police officers and staff are dealt with. The police and crime commissioner (PCC) has recently established an independent group from outside the police service to review completed PSD case files to provide some independent audit. In the main, staff and staff association representatives spoken with by HMIC expressed the view that investigations were dealt with fairly. There is an appeals process should any officer or staff member feel that they have been unfairly treated. This is overseen by an independent reviewer.

The two assessors who complete all initial severity assessments are SO1 police staff grade, which equates to the rank of police inspector. The Police (Conduct) Regulations 2012 and the Police Reform Act 2002 require that this function be performed by an officer of chief inspector rank or equivalent.

There are confidential mechanisms, supported by a clear policy, for staff to report wrongdoing through a confidential email system and a telephone reporting line. The telephone line is little used, but the CCU receives a high level of reporting through the email system. The system allows staff to interact with the CCU and get an update on their report by using a PIN number. No analysis is done of the nature or volume of calls at present.

In the main, officers and staff feel that there is a climate in which they are confident to report misconduct and unprofessional behaviour by individuals or groups, and that they would receive support in doing so. Some said that they would be fearful of adverse consequences if the matter involved a more senior colleague, particularly in relation to their own promotion prospects.

The constabulary responds to reports of wrongdoing by staff in a timely manner. The effectiveness of the response is to some extent limited by capacity and the CCU, in particular, be more proactive and develop further the intelligence reports they receive if it had more staff. The constabulary intends to address this through an increase of staff within the CCU by two detective constables.

The constabulary publishes data and information on the freedom of information section of its website in relation to the gifts and hospitality register. This covers all chief officers, including accepted and rejected offers. Information on gifts and hospitality for other ranks is made available in response to requests under the Freedom of Information Act 2000. The register of business interests on the website lists staff by rank and the type of business interests. It does not name the individuals. The outcomes of misconduct hearings are made available to the public. However, the individuals concerned are not named.

We conducted a review of a small number of PSD cases. This included reviewing up to ten randomly selected cases involving serious misconduct or criminal conduct. The aim was to check on the timeliness, supervision and appropriateness of decision making. We found that misconduct cases are appropriately referred to the Independent Police Complaints Commission (IPCC) and the constabulary has regular meetings with the regional IPCC commissioner. The constabulary uses the IPCC bulletin to disseminate learning but does not encourage and collate responses to the information from the workforce. The bulletin is distributed throughout the PSD and to local PSD liaison officers who are responsible for ensuring that divisional officers and staff are made aware of its content. The constabulary has a 'lessons learned forum', which the head of PSD attends. This forum can also be used to disseminate any learning from the IPCC. The PSD produces its own publication, 'The Standard', which is used to highlight issues raised by the IPCC.

## Professional standards training and resources

The constabulary ensures that staff in the PSD and the CCU receive training for their role. The current staff have considerable expertise and experience. No skills gaps have been identified and specialist resources are made available to support staff if needed.

Some succession planning takes place to ensure consistency within the PSD and the CCU, particularly for senior management roles. Most staff have been in the department for a long time, which has benefits in terms of stability within the unit. Movement into the unit is through formal application and selection, and a posting to the PSD is seen to be a sought-after position.

Limited analysis is carried out to identify trends in relation to integrity issues (including misconduct and unprofessional behaviour). When there is a significant issue for the constabulary, a problem-solving approach is taken. For example, a group was established to address the issue of several reports of officers abusing their power for a sexual motive in one district, which led to the establishment of the 'It started with a kiss' awareness-raising campaign.

At present, the CCU has limited capacity for analysis work, such as cross-checking sickness records, financial records of staff and other analytical methods for assessing vulnerability, although the head of the CCU is aware of what needs to be done.

## Recommendation

**Within six months, the force should ensure that it has the proactive capability to effectively gather, respond to and act on information that identifies patterns of unprofessional behaviour and corruption.**

The constabulary has seen an increase in complaints during 2013/14 of 35 percent compared with the 2012/13 figures. Many of the complaints received are dealt with by staff on the divisions, but are overseen by the PSD. For this reason, the police staff in the department are not nationally accredited and designated by the chief constable to exercise powers to assess the severity of the misconduct alleged under the Police Reform Act 2002. The work requiring those powers is done by supervisors on divisions or police officers within the PSD, or the CCU team. The resourcing for the department is an issue that the constabulary has recognised, and plans to establish additional resources will provide a proactive capability to address some of the areas for improvement identified in this report.

Misconduct hearings are structured to promote fairness, efficiency and lawfulness. There is an appropriately qualified presiding officer, who has no connection to the person investigated. If the hearing arises from a public complaint, the constabulary will invite the aggrieved person and a representative from the office of the police and crime commissioner (OPCC) to attend. There is also an independent member on the panel. If there is an issue of risk to public confidence from a case, the constabulary will arrange for a chair and panel from another force to enhance independence. Staff associations that attend hearings to represent their members have not raised any issues about fairness, effectiveness and legitimacy.

The constabulary considers the use of the fast-track dismissal process when appropriate, but has not yet had cause to use this process.

## Quality assurance

The constabulary audits all decisions in misconduct hearings with the head of PSD and the DCC reviewing the outcomes. Misconduct meetings resulting from allegations of misconduct or unprofessional behaviour against officers and staff are also reviewed. The PCC has in addition recently introduced a review of completed PSD case files, to be carried out by an independent non-police group. When a hearing takes place, the head of PSD will get feedback from the chair, including feedback on how the enquiry was managed.

Some audit takes place to ensure that investigations are justifiable; dealt with at the right level; and escalated or de-escalated appropriately. Co-ordination meetings between the PSD and line managers are used to review the more serious investigations and the severity risk assessment is adjusted accordingly. HMIC's dip sample of case files found that some do not contain much in the way of PSD management entries, which would promote confidence that all investigations are regularly reviewed as they progress.

The constabulary ensures the timeliness and quality of all investigations conducted in relation to officers and staff, whether they are carried out by the PSD or another department. The HR department carries out investigations and manages misconduct processes in respect of police staff complaints when those conduct issues are assessed as gross misconduct. Those matters assessed as misconduct are investigated by local line managers. These are allocated through district liaison officers. HMIC found that some supervisors feel that they are overburdened with these enquiries, which take up a considerable amount of time in their working day. The divisional allocation process gives strict deadlines for completion and the constabulary's performance report for April 2013 to March 2014 shows the average time to complete an investigation is 81.2 days, second best nationally for investigation timeliness. The national average is 133 days. Quality of investigations is assured through departmental management reviews. HMIC confirmed through file reviews that investigations appear to be well conducted and progressed.

There is a clear policy and consistent decision making on suspension, resignation and retirement during investigations. Few police officers or staff are suspended because the policy is to try and redeploy those officers to low-risk roles. The decision to suspend is made by the deputy chief constable and reviewed every 28 days. When an officer resigns while under investigation, the individual will be included on the recently established College of Policing's disapproved officer register.

# How well does the force prevent, identify and investigate corruption?

## Identifying corruption

The constabulary does not manage threat, risk and harm from corruption in a formalised and structured way. Some planning does take place when the constabulary identifies an issue that requires senior force-wide management action, at which point an oversight group led by a senior officer is established.

However, HMIC did not find evidence of planning and prioritising arrangements to analyse corruption risks systematically. The constabulary does not review counter-corruption activity to explore and manage staff vulnerabilities, and it does not assess the effectiveness of those measures. This is an area for improvement for the constabulary.

## Recommendation

**Within six months, the force should ensure that it has a tasking and co-ordination process that considers, prioritises and records corruption-related intelligence.**

The head of the counter-corruption unit (CCU) has completed an integrity action plan, based on the national and regional counter-corruption threat assessments, identifying what action needs to be taken. However staffing and the current workload within the CCU have meant that this has not been progressed as yet. The current work of the unit is mainly reacting to intelligence reports received, with proactive work limited to the use of dedicated software to monitor computer misuse, or reviews of the gifts and hospitality registers.

In the main, vetting arrangements comply with the national vetting policy and identify any potential corruption risks at the recruitment stage for officers and staff. They are revisited on promotion to senior ranks or posting to sensitive or vulnerable roles, with the exception of the requirement to check social media, which is not currently completed. Higher levels of vetting within the national vetting policy require a social media check to be carried out.

The constabulary proactively and regularly monitors its IT systems and constabulary social networking sites, and takes action when appropriate. It uses commercially available software to monitor staff use of the internet and constabulary systems. This proactivity has led to, and provided evidence for, numerous investigations for misuse of computer systems. The constabulary does not monitor personal use of social media unless reacting to an intelligence report.

The constabulary does not currently use random drug testing because the approach has not yielded any positive tests. However, this misses the point about the potential deterrent effect of random tests especially for those in safety critical roles such as firearms. The constabulary does undertake intelligence-led drug and alcohol testing. It also uses intelligence-led integrity testing and examples were provided to HMIC to show that this takes place. Results are not routinely circulated to the workforce, but may be mentioned in general terms during professional standards department (PSD) presentations to staff.

The constabulary ensures that organised crime investigations are not compromised and protects forthcoming operations from corruption to reduce the risk of compromise. Staff working on organised crime group (OCG) operations are routinely checked by the CCU to ensure that they are not vulnerable to corrupt approaches. This includes a check of the department's intelligence database. The CCU detective inspector is a designated and trained operational security manager (OpSy), provides this role for the constabulary and liaises closely with his counterpart in the regional organised crime unit.

The constabulary ensures the effective security of systems, exhibits and case papers. It has an information security policy and guidance document, which sets out the requirements to ensure the effective management of information security.

## Intelligence

The constabulary gathers actionable intelligence reports on corruption and grades them using the appropriate intelligence-grading system. When resources permit, these will be developed and investigated. All intelligence reports are entered onto the CCU's intelligence system. The head of the CCU has, however, produced an action plan based on identified threats using the national and regional counter-corruption threat assessments. This has not been progressed because resourcing issues but the constabulary is aware and the matter is in hand.

The constabulary has suitable arrangements in place to oversee reported misconduct and there is a formal two-weekly planning and prioritising meeting held by the PSD. At this meeting, all new intelligence and ongoing investigations are also discussed.

Intelligence is acted upon and monitored through a structured management process by the head of CCU. Once received within the CCU, the information is passed to assessors at a point when there is a suitable enquiry to progress. The matter is then entered onto the 'Centurion' database, the computer-based system for the management, recording and storage of complaints and misconduct, and the investigation is monitored and directed through the formal planning and prioritising meeting.

Intelligence gathered or received is analysed, graded in accordance with the national intelligence model and developed before being allocated for activity. Actionable intelligence is developed and monitored through a structured planning and prioritising process within the department and through discussion between the head of the PSD and the deputy chief constable.

The constabulary effectively identifies multiple suspects and multiple offences by a single suspect, and processes are in place to ensure this. File checking by HMIC included investigations involving multiple suspects, as well as multiple offences, indicating that this does happen in practice.

There are insufficient resources to deal with the flow of intelligence, partly due to recent staff absences and other responsibilities undertaken, such as supporting research in response to requests under the Freedom of Information Act. The CCU could do more in this respect if it had more resources available to progress the intelligence reports and conduct proactive investigations and preventative initiatives.

## Capability

The CCU has ready access to specialist police staff and equipment when required. This includes undercover officers, technical equipment and specialist skills such as computer analysis, communications data and interrogation of constabulary systems.

The CCU is not sufficiently resourced to support a proactive and preventative capability. The unit currently has two detective sergeants and two detective constables, a researcher and one analyst who is responsible for maintaining and checking the intelligence database. The unit is headed by a detective inspector, but that post holder has other roles as well, including responsibility for responding to freedom of information requests. Just prior to the HMIC inspection, the CCU's investigative staff had been fully committed responding to allegations of inappropriate sexual conduct by an officer.

The constabulary ensures that lessons are learned and disseminated to officers and staff through a number of routes. There is a constabulary 'Lessons learned forum' into which issues are fed by the head of the PSD. In addition, the PSD passes messages to districts through the district liaison officers and its departmental newsletter, 'The Standard', which is published quarterly.

# Recommendations

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- **Within six months, the force should ensure that it carries out regular audits of integrity-related registers including gifts and hospitality, business interests, notifiable associations, expense claims, procurement activity and other records to identify potentially corrupt activity.**
- **Within six months, the force should ensure that it has the proactive capability to effectively gather, respond to and act on information that identifies patterns of unprofessional behaviour and corruption.**
- **Within six months, the force should ensure that it has a tasking and co-ordination process that considers, prioritises and records corruption-related intelligence.**