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# Police Integrity and Corruption

Cambridgeshire Constabulary

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

Cambridgeshire Constabulary, working with both Bedfordshire Police and Hertfordshire Constabulary, has developed a joint professional standards department (PSD) which has been in place for 18 months. The three forces are continuing to develop their joint policies and procedures to improve the efficiency and effectiveness of how they jointly manage and respond to unprofessional behaviour, misconduct and corruption. However, there is currently insufficient capacity to prevent, reduce and investigate corruption matters effectively.

### Summary

There is clear leadership from the chief constable, and individuals have a good awareness of the boundaries of professional and unprofessional behaviour. Police officers and staff are aware of their responsibilities to challenge unprofessional behaviour, and have confidence that supervisors, managers and the PSD would respond appropriately to issues. The constabulary has introduced the Code of Ethics and has an associated implementation plan. The constabulary incorporates ethical and professional behaviour guidance into policies and procedures. In particular, the constabulary has worked with Bedfordshire Police and Hertfordshire Constabulary in a strategic alliance to agree and put in place common policies and procedures that apply to integrity, professional behaviour and standards. There is, however, some lack of understanding on the part of individuals of their personal responsibilities and, in addition, a need to ensure consistent auditing and publication of key registers such as the business interests register. Training on ethical and professional behaviour is provided to staff but there is a need to provide integrity training and to ensure knowledge is sufficient.

While the constabulary has a clear procedure for disseminating the lessons it has learned from misconduct procedures and referring issues to the responsible managers, it should improve how it tracks any action taken to see that it has been completed. The PSD and anti-corruption unit (ACU) have police officers and police staff with appropriate skills and experience for the roles they perform. They are selected from across all three forces in the strategic alliance, but there was little evidence of any structured succession planning (to make sure that the right staff are in place if someone leaves).

The constabulary needs to develop improved tasking and co-ordinating processes for the ACU with better analysis and research to identify proactively any misconduct and corruption risks. The constabulary does respond as effectively to corruption issues as it should, and can only react to reports of misconduct as it does not have the capacity to take active steps to identify misconduct and corruption.

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

HMIC highlighted two areas for improvement in the December 2012 report.

**1. Cross-reference contract and procurement registers with the registers of gifts and hospitality, and second jobs.**

A joint electronic procurement register is due to be implemented in September 2014.

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

Clear chief officer leadership demonstrated.

Individuals understand personal responsibilities and how to report wrongdoing.

The constabulary has a delivery plan for this area of business and has introduced the Code of Ethics.

The constabulary has policies for registering gifts and hospitality, business interests and secondary occupations that are managed by the PSD.

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

There is no consistent approach to the checking of the PSD records for promotion and selection to specialist or vulnerable posts.

The PSD and the anti-corruption unit (ACU) do not have the capacity to be proactive.

The three forces in the strategic alliance have made good progress in introducing combined policies concerning behaviour, standards and professionalism.

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

ACU staff support the provision of training at all levels.

There is no effective tasking and co-ordinating meeting structure by which new intelligence and other critical issues are assessed and prioritised for action by the ACU.

Analysis and research are completed in response to ongoing investigations but there is limited proactive analysis to direct activity.

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

**2. There had been no specific training on integrity.**

Messages are circulated by email and through the three-force professional standards department (PSD) intranet site. Some training has been delivered by the PSD and an e-learning package has been circulated, but the training has not been mandatory.

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

There is a sound joint PSD governance structure for all three forces in the strategic alliance.

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

The constabulary correctly refers investigations to the Independent Police Complaints Commission (IPCC) and has regular meetings with them to ensure compliance and review ongoing investigations.

The constabulary does not fully comply with the national vetting recommendations.

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

The ACU has staff with the right skills and experience to analyse, develop and covertly investigate, but it does not have the resources to be proactive.

The constabulary has a positive working relationship with the IPCC when referrals are appropriate.

# The force/constabulary in numbers



## Complaints

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

**356**

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

**15.4**

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

**29**

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

**1.3**

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

**2.6**



## Business interests

Applications in 12 months  
to March 2014

**77**

Approvals in 12 months  
to March 2014

**77**



## Resources

Proportion of workforce in  
PSD/ACU

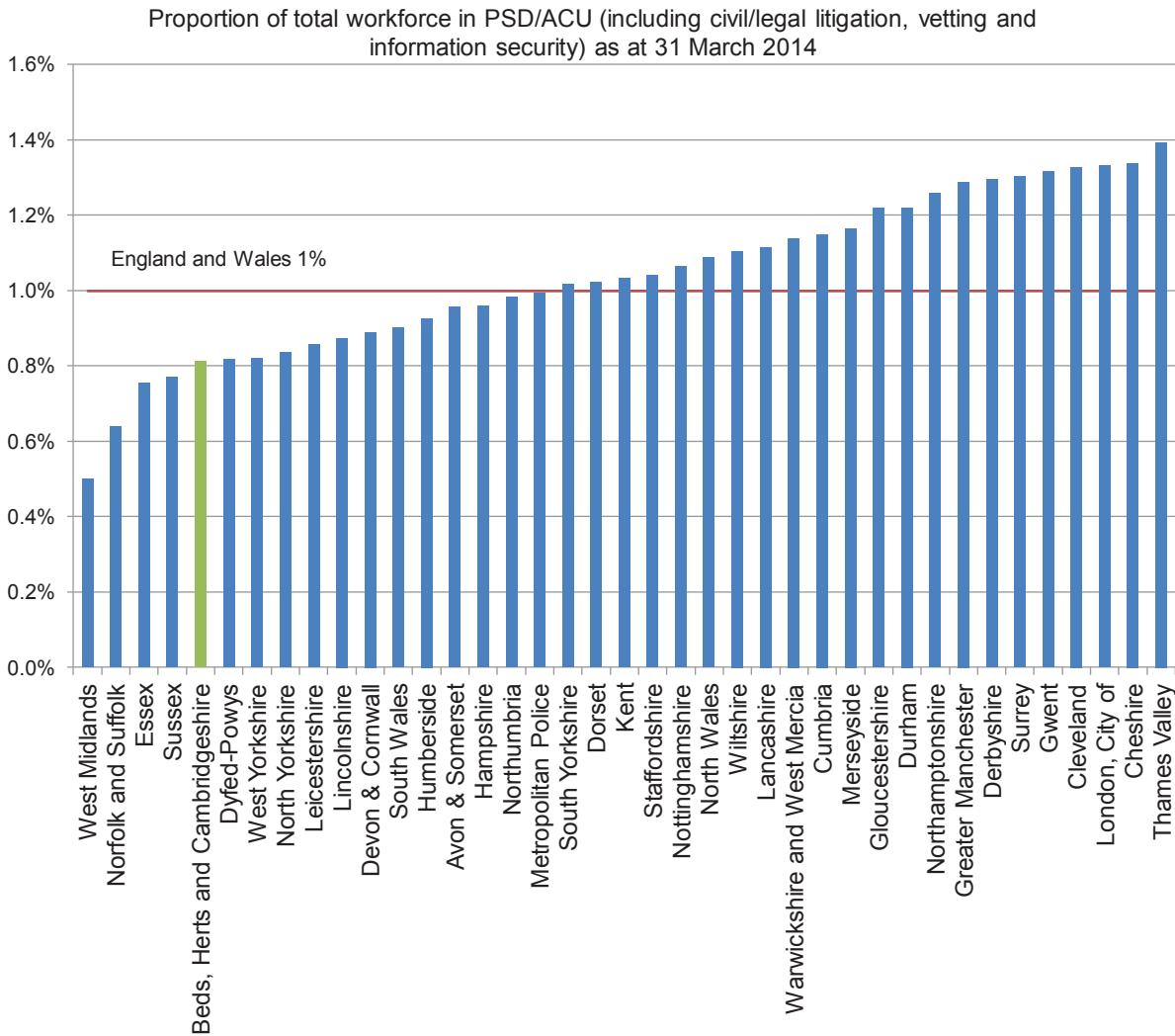
**0.8%**

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.justiceinspectors.gov.uk/hmic/](http://www.justiceinspectors.gov.uk/hmic/) in early 2015.

1 *Without fear or favour: A Review of Police Relationships*, HMIC, London, December 2011. Available from [www.justiceinspectors.gov.uk/hmic/media/a-review-of-police-relationships-20111213.pdf](http://www.justiceinspectors.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.justiceinspectors.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.policing.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 two areas for improvement for Cambridgeshire Constabulary from the 2012 inspection report:

- To help ensure integrity of the procurement process, monitoring should be put in place to cross-reference contract and procurement registers with the registers of gifts and hospitality, and second jobs. A new IT system to track purchase orders and procurement to the point of payment should be introduced. This would improve the efficiency of procurement management within the force.
- There had been no specific training on integrity issues since our last inspection in 2011. Changes to policies and guidance are communicated via email and intranet systems, but there is no mechanism to check that officers and staff have read and understood them.

With respect to the first issue, there has been limited progress. There is still no common platform for progressing purchase orders. The head of procurement has developed a joint policy around procurement, contract management and monitoring. This has received outline approval but still requires formal sign-off. This would improve the governance arrangement, but the policy is unlikely to be in place before September 2014.

With respect to the second issue, while there continue to be messages concerning integrity transmitted by email and the intranet systems through the professional standards department (PSD) intranet site, HMIC found limited evidence that dedicated integrity training has been developed or delivered, although some training provided by the PSD has been included in various training programmes and dedicated training days. An e-learning training package has also been used, but is not mandatory for staff to complete. There is an opportunity for the constabulary to progress and satisfy itself that all staff have received and understood messages concerning integrity as it continues to implement the Code of Ethics. HMIC found that Cambridgeshire Constabulary has completed a staff survey that has provided it with an understanding of how all staff view the behaviour and standards of the organisation, their leaders and their colleagues, and how confident they are about approaching managers to raise concerns and issues. The constabulary is now considering what action to take as a result of the information obtained through the survey.

Overall, the constabulary has made limited progress in the two areas of improvement identified in the 2012 report.

# 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

There is clear leadership from the chief constable, demonstrated by the use of blogs, leadership seminars and annual force development days. This year, these days have also included the launch of the force's 'people strategy', which incorporates standards of behaviour and leadership. The chief officer team strongly support the chief constable's stance, with the result that there is a climate of ethical behaviour and willingness to challenge poor conduct.

Officers and staff are aware of the boundaries of unprofessional and professional behaviour and some understand how their behaviour affects both the public and their colleagues. Bedfordshire Police, and Cambridgeshire and Hertfordshire Constabularies have been in a strategic alliance since 2012 and have collaborated to create a joint professional standards department (PSD) reporting to the Cambridgeshire Constabulary deputy chief constable (DCC), who is the chief officer professional standards lead for all three forces. He has recently issued a booklet entitled *Know your boundaries*, endorsed by all three forces, that draws links to various relevant joint policies and sets out the standards expected from everyone. All officers and members of staff spoken to during this inspection said that they would feel confident in challenging unethical or unprofessional behaviour and some had examples of when they had done so. They stated that they would challenge unethical and unprofessional behaviour irrespective of rank or role, and would feel supported in doing so.

Ethical and professional behaviour standards have been incorporated into some but not all relevant policies and procedures, many of which are joint policies across the strategic alliance. Not all these policies and procedures have been reviewed by the PSD to ensure that the ethical guidance contained is consistent.

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

The constabulary has plans to embed the new Code of Ethics into all aspects of its work, but these plans are not well developed. It has recently established an internal ethics steering group chaired by the DCC, and he has conducted a number of roadshows to introduce the Code.

Staff are aware of their responsibility to challenge and report misconduct and unprofessional behaviour. The PSD policies are the same for all three forces and include a recently agreed joint reporting wrongdoing policy. HMIC was provided with examples of staff reporting issues, and of individuals appropriately challenging managers and senior leaders. However, HMIC found no evidence of any auditing of how the constabulary responds to reports or intelligence of misconduct.

There is a joint notifiable association and media relationships policy outlining the obligation to declare any change in circumstances in an officer's or staff member's personal associations and relationships. Staff told us that they feel comfortable about disclosing changes in circumstances within personal relationships or associations, but some officers and staff members are not aware of their responsibilities. There is a lack of clarity on what should be disclosed with respect to relationships. However, when advice is sought on this issue from the PSD, however, staff feel they are very helpful.

Briefings on notifiable associations has been provided to staff through the joint force PSD publication, *Shield*. Staff are only made aware of their obligations to notify changes in circumstances or personal relationships when they join the service.

## Recommendation

**Within six months, the force should ensure that it has communicated to all staff the requirements to comply with policies relating to notifiable associations, secondary employment, business interests, and gifts and hospitality.**

The National Decision Model (NDM) is used widely across the constabulary. Officers and staff are trained and understand its application. Use of the NDM is covered by an e-learning training package that is mandated for completion across the whole constabulary. The NDM is further used regularly in learning and development programmes as a model by which to approach problems including, but not limited to, police operational issues. Staff apply and use it well operationally and when dealing with staffing issues. They do not immediately relate the NDM to making decisions about what to do when faced with an ethical dilemma.

Training on ethical and professional behaviour is provided to all staff but not regularly and no checks are carried out to confirm that sufficient learning has taken place. HMIC found good evidence of newly promoted inspectors, managers, sergeants and supervisors making a contribution, led by the PSD, to the leadership development programme. The constabulary has placed an emphasis on ethics and integrity as part of initial training, with a PowerPoint presentation on the Code of Ethics recently appearing on the constabulary intranet. One operational team has requested and received a specific briefing from the PSD covering a number of issues relating to conduct, behaviour and ethics. While there have been a number of e-learning training packages relating to professional behaviour and expectations, HMIC found there is no awareness of the dangers of unconscious bias, although the constabulary acknowledged that this has been referred to in a recent letter sent to forces by the Home Secretary.

As far as policing ethics and standards are concerned, there is no overarching training plan, and the constabulary does not have a structured method for checking that adequate learning has taken place and that the contributions of the PSD, chief officers and others have been effective.

Chief officer leadership on integrity issues (including misconduct and unprofessional behaviour) is visible and recognised by staff. There are clear messages on the intranet, on posters and in briefings to staff from chief officers that encourage positive behaviour and explain the boundaries of acceptable behaviour.

The DCC is the chief officer lead and appropriate authority for all three forces in the strategic alliance and, locally, the chair of the constabulary's internal ethics steering group. Officers and staff at all levels know who the lead chief officer is and who the head of the PSD is, and confirmed consistent and clear messages from both.

Chief officers provide sufficient information to the police and crime commissioner (PCC) to enable the PCC to understand any integrity issues (including misconduct and unprofessional behaviour). The PCC formally engages with the constabulary through a monthly strategic executive board, chaired by the chief constable and supplied with regular analytical reports by the PSD. The PSD engages with all three PCCs to ensure that they appropriately oversee misconduct issues.

A strategic alliance governance board structure, which includes the three DCCs, the strategic alliance lead head of human resources (HR) and the finance officer for collaboration will, in future, meet bi-monthly to discuss issues relating to integrity and chief officers' understanding of it. The first meeting took place in May 2014.

Cambridgeshire Constabulary has recently changed its own governance arrangements. An internal ethics board has been established and includes on its agenda an item on current risks to the constabulary. This board will, in the future, have a record of actions, with identified owners for each action and accountability for completion of associated work.

Policies or guidance set out the meaning of misconduct and unprofessional behaviour. They describe acceptable boundaries of conduct and what is expected of staff in their private and professional life. HMIC was provided with, and found, good examples of these policies, in particular the PSD-related policies, which are the same for all three forces. The strategic alliance has joint policies including a reportable association and a media relationship policy, as well as a business interest and secondary employment procedure and a reporting wrongdoing policy. The joint policy on procurement, however, is awaiting sign-off.

## Understanding integrity

Some work has been carried out to improve the constabulary's understanding of how integrity issues affect public trust. The constabulary has seen some improvement in public confidence. In 2013, an internal staff survey was conducted, which included questions about integrity, willingness to challenge wrongdoing and staff's perception of their manager's behaviour, attitude and trustworthiness.

The constabulary has just published the results of this survey and is assessing its response. HMIC noted the high level of positive views expressed by staff in relation to standards of behaviour and the level of trust they feel towards line managers and leaders.

Details of all occasions when officers and staff are offered gifts or hospitality are recorded by the PSD in a centrally held register on behalf of all three forces. These records (including those entries relating to chief officers) are audited regularly and inappropriate entries are challenged or investigated. The gifts and hospitality policy and associated procedures are clear and provide good instructions as to what can and cannot be accepted. There are three main categories: gifts under £20; gifts from £20 to £50; and those over £50. Staff and officers have a general understanding of the policy and the fact that gifts and gratuities have to be recorded centrally. Some officers said that they would not accept any gift because they were concerned as to how it would be interpreted. There is a lack of understanding that refused as well as accepted gifts need to be recorded. There should therefore be more communication to ensure refusals are also recorded on the centrally held register in line with the policy.

Details of all occasions when officers and staff have applied for authorisation for a business interest, secondary employment or membership of an organisation are recorded fully in a central register (which includes entries for those applications that are refused), held on behalf of all three forces by the PSD. Authorised applications are normally reviewed every 12 months. Approval may be removed if review forms are not submitted or there is a change in circumstances. The officer's line manager has the responsibility of making the initial assessment. It is not clear that all the applications that are refused at the initial assessment stage are forwarded to the PSD. In addition, departmental managers may not possess a full list of which members of their staff have obtained approvals. Staff, have little awareness of the need to declare voluntary work that could have an impact on their role.

The rejected business interest applications that reach the PSD are followed up by the department if there is any intelligence that suggests that the unsuccessful applicant has ignored the refusal or failed to declare a business interest. Using a regularly updated list to inform departmental managers which of their staff have obtained approvals would provide managers with an additional source of intelligence about whether policy or instructions have been disregarded.



# 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 when the constabulary makes decisions to transfer officers to specialist roles and to promote officers to some, but not all, positions. Within Cambridgeshire Constabulary, misconduct issues and unsatisfactory performance procedures are generally considered at some stage during the transfer or promotion process, but not in relation to specialist or sensitive posts. There are no checks made for those officers seeking to undertake the senior police national assessment centre (SPNAC) or fast-track development scheme because there is a mistaken belief that such checks will be undertaken elsewhere. If the PSD is made aware of applications and sensitive intelligence does exist, it provides a briefing if necessary.

The constabulary does not assess how investigations are conducted, how progress is recorded or how sanctions are imposed, in order to ensure that all staff, irrespective of rank or role, are treated fairly and equally. The head of the PSD or their deputy conducts assessments for all police officers and special constables but they do not do so for police staff. The head of human resources (HR), as with the other two forces in the strategic alliance, makes the assessment of severity for police staff. There is a police staff disciplinary procedure that is the same for all three forces.

There is a confidential system for officers to report wrongdoing, which is supported by a policy that is promoted through the joint PSD intranet site and the PSD publication, *Shield*. There are three different confidential reporting mechanisms across the strategic alliance. Staff in Cambridgeshire Constabulary understand their force system and feel comfortable using it. HMIC found positive support for the reporting mechanism from staff associations including the first contact officer scheme<sup>4</sup>. The constabulary is clearly strong in this respect.

There is a confidential system for officers to report wrongdoing, which is supported by a policy that is promoted through the joint PSD intranet site and the PSD publication, 'Shield'. There are three different confidential reporting mechanisms across the strategic alliance. Staff in Cambridgeshire Constabulary understand their force system and feel comfortable using it. HMIC found positive support for the reporting mechanism from staff associations including the first contact officer scheme. Although the constabulary is clearly strong in this respect, we identified some concerns about the use of the confidential system in relation to crime data integrity.

HMIC found that cases are generally appropriately referred to the Independent Police Complaints Commission (IPCC) and that the IPCC statutory guidance is followed. There are good relationships with the IPCC and if there is any doubt about an issue a referral is made to them.

<sup>4</sup> This scheme provides officers who have been trained to give advice and support to officers and staff over issues of concern, which will include concerns about bullying, wrongdoing and other ethical issues.

The constabulary uses the IPCC bulletin to disseminate learning. It also publishes its own 'lessons learned' bulletin and the PSD includes relevant articles within the Shield publication. These bulletins are assessed by and presented to the strategic alliance PSD governance board and complaints sub-group (this is a recent development under new governance arrangements). While lessons from the bulletins are circulated to senior officers who have responsibility for updating policy to ensure that action is taken, responses to the bulletins are not collated to check what action has been taken, and whether changes to policy are required across the three forces.

## Professional standards training and resourcing

Members of staff in the PSD and the ACU receive regular training for their role. A procedure called a 'training need analysis' has been undertaken for the PSD. When necessary, this process can give access to funds from the training budgets of the three forces for external courses. Police staff assistant investigators are accredited and undertake the assistant investigators' programme. Staff maintain their continuing professional development by attending conferences.

Succession planning (to make sure that the right staff are in place if someone leaves) does not take place to ensure consistency in the PSD or the ACU. This issue is further exacerbated by the strategic alliance requiring that a post identified as belonging to one force is first advertised in that force and is only advertised in the other two if the post is not filled. There have been difficulties in finding detectives with the right skills unless they have previously worked within the PSD.

The joint PSD is not sufficiently resourced to undertake proactive and preventative activity. The constabulary has recognised scarcity of resources as a problem and an independent management review of the PSD was conducted in 2013. This resulted in some growth in resources and some reduction in, and downgrading of, police staff roles. Nevertheless, the review failed to meet the needs of the PSD and a further review was commissioned by the constabulary in April 2014, which also identified capability and capacity as particular issues. Since then, there has been a temporary increase in resources, including analytical, investigative and management support within the ACU (primarily relating to a specific operation). There is a desire to make the increase in resources permanent. This would be beneficial.

## 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.**

Misconduct hearings are structured so as to ensure transparency, effectiveness, efficiency and legitimacy, and are conducted in line with police (conduct) regulations. Work is being undertaken to explore the possibility of forming a bank of senior officers from across the strategic alliance to sit on hearings or panels, whatever the home force of the accused. Forces within the strategic alliance need to satisfy themselves that the same level of robustness and transparency applied in police officer misconduct hearings is also in place with respect to police staff misconduct hearings.

The constabulary makes use of fast-track dismissal when appropriate. The investigating officer is expected to write a report to the head of the PSD not only when fast-track is a viable option, but also when it is not.

## Quality assurance

The constabulary does not audit decisions regarding allegations of misconduct or unprofessional behaviour against officers or staff in hearings or meetings. Although reviews of individual cases are conducted, reviews of the whole process do not take place to ensure transparency, effectiveness, efficiency and legitimacy.

No audits take place to ensure that investigations are justifiable, dealt with at the right level and escalated as necessary.

The constabulary monitors 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 such as HR or a local policing command. There has been a marked increase in recent years in the number of both public complaints and misconduct investigations, and this is causing resourcing issues for the PSD. More public complaints are being delegated to local managers. There are unacceptable delays in some cases. Work to improve this is a key objective for the PSD in 2015. While all gross misconduct cases concerning police staff are either investigated or overseen by the PSD, misconduct is managed by the local HR department. There is no standard approach across the strategic alliance.

## Recommendation

**Within six months, the force should ensure that it has sufficient capability and capacity to enable the recording and conducting of timely and proportionate investigations into public complaints.**

The constabulary has a process for ensuring consistency for those officers and staff who have resigned or retired while under investigation. The head of the PSD provides sufficient information for the strategic alliance professional standards lead DCC to make an informed decision in these cases, as regards any notification to the College of Policing for those individuals to be recorded on the disapproved list<sup>5</sup>.

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<sup>5</sup> This is a national register of officers who have been dismissed for gross misconduct, including those electing to resign or who retire in the face of gross misconduct; this is held by the College of Policing.

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

## Corruption investigation

The constabulary does not identify staff or groups vulnerable to corruption by, for example, profiling officers and staff who may face debt problems. This is an issue that the strategic alliance acknowledges but which, given the present capacity for research and analysis, is unlikely to be addressed in the near future as a priority.

Vetting arrangements do not fully comply with the national vetting policy and do not identify corruption risks at the recruitment stage for officers and staff. This is acknowledged by the strategic alliance and has been included on the force risk register for management for each of the three forces. In 2015, a new vetting code will be produced by the College of Policing and Cambridgeshire Constabulary will need to ensure that it is prepared to comply with the conditions of that code.

## Recommendation

**Within six months, the force should ensure that it complies, as far as practicable, with the current national vetting policy and develops plans to fully comply with the new vetting code when it is published in 2015.**

The constabulary does not routinely monitor force systems and social networking sites such as Facebook. This is, however, done on a targeted basis. Constabulary Twitter accounts are monitored by the corporate communications department and, if necessary, referrals are made to the professional standards department (PSD). The monitoring of force systems is complicated by the fact that monitoring is the responsibility of the anti-corruption unit (ACU) and each force has different systems (there are, for example, three different intelligence systems across three forces). The recent recruitment of an intelligence support assistant within the ACU should improve the response to this area of risk.

The constabulary uses 'with cause' substance testing to identify corruption but gave no recent examples of this process being followed. Random tests are not used, but some staff still believe that they are being conducted.

The constabulary has taken steps to ensure that organised crime investigations have not been compromised by corruption risks and that forthcoming operations are protected from the risk of corruption. Responsibility for this has now moved to the Eastern Region Serious and Organised Crime Unit (ERSOU). There is a need to ensure that the newly appointed detective chief inspector within the PSD attends constabulary-level tasking where these investigations are discussed, in order to maintain an effective link.

The constabulary ensures the effective security of systems, exhibits and case papers, and has a detective chief inspector in charge of information security. Records are held and managed at a secure site with access only authorised by the head of department. The constabulary has a system user manager for each key system such as crime, intelligence and incident recording. It has reintroduced audits on key systems and any issues go to either the line manager or, if appropriate, the PSD. The reviewing and disposal of papers can be poor on occasions, partly because the constabulary relies on old IT systems and must still undertake some of the work manually. The constabulary recognises this issue, and is working to resolve it. A new property system (KIMS) is in place and managed at a local level.

## Intelligence

There is limited analytical, research and intelligence development capacity within the ACU, but what does exist is being used to react to and support ongoing investigations. Limited proactive work is therefore undertaken to identify trends, risks or vulnerabilities to the constabulary. The ACU in general is only staffed five days a week, although the PSD provides cover outside office hours and at weekends to respond to incidents such as death or serious injury following police contact. This means that calls received on the confidential reporting system after close of business on a Friday will not be answered until the Monday.

There is no effective tasking and co-ordinating meeting structure by which new intelligence and other critical issues are assessed and prioritised for action by the ACU. This is acknowledged by the constabulary as an area that it needs to develop. The constabulary should adopt a daily tasking process to discuss and prioritise new intelligence and other critical issues, as well as a tasking process occurring every two weeks to monitor and direct investigations. This tasking process should be auditable to enable accountability and clarity in the rationale for decision making.

## 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.**

Intelligence gathered or received is analysed, graded in accordance with the authorised professional practice and developed before being progressed. Intelligence is prioritised for development using a RAG (red amber green) grading, and the use of the NDM provides a rationale for any decision made.

There are insufficient resources to deal with the flow of intelligence. There has been no full-time analyst for nine months, which has clearly had a detrimental impact on the capability of the ACU to deal with the intelligence flow. The current situation is being eased by the temporary increase in resources.

## Capability

The PSD and ACU have access to specialist teams across the three forces as well as ERSOU and the counter terrorism intelligence unit. The constabulary has tasked resources within Bedfordshire Police with supporting operations and HMIC found examples of constabulary-wide resources being used to support operations. While there is a good range of skills and qualifications within the ACU and members of staff are enthusiastic and wanting to do more, there is insufficient capacity to provide an effective proactive capability for all three forces.

The performance of the PSD and ACU is regularly monitored by the constabulary, which looks at the timeliness and quality of complaints handling, investigations, decision making, outcomes and appeals. The ACU confidential update reports are sent monthly to the chief officer team and senior managers. The head of ACU has a clear and direct reporting line to the chief officer lead for all three forces, has a good working relationship with this officer, and can make regular daily contact if required.

The constabulary ensures that lessons are learned and effectively disseminated to officers and staff through good use of the intranet, which includes an online version of the Shield publication, and a specific publication recording the lessons the constabulary has learned for all officers and staff. Officers and staff have good knowledge of the publications and they were easy to find through the PSD portal on the constabulary intranet site.

Covert investigations are appropriately referred to the Independent Police Complaints Commission (IPCC), in accordance with the statutory guidance. This was confirmed through the checks undertaken as part of the inspection.

## Recommendations

- **Within six months, the force should ensure that it has communicated to all staff the requirements to comply with policies relating to notifiable associations, secondary employment, business interests, and gifts and hospitality.**
- **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, force should ensure that it has sufficient capability and capacity to enable the recording and conducting of timely and proportionate investigations into public complaints.**
- **Within six months, the force should ensure it complies, as far as practicable, with the current national vetting policy and develops plans to fully comply with the new vetting code when it is published in 2015.**
- **Within six months, the force should ensure that it has a tasking and co-ordination process that considers, prioritises and records corruption-related intelligence.**