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# Police Integrity and Corruption

Cheshire Constabulary

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

Cheshire Constabulary has addressed a number of the areas identified in HMIC's 2012 report, *Revisiting Police Relationships*. Chief officer leadership is strong and there is an obvious climate of professionalism throughout the force. Wrongdoing is challenged but work is necessary to develop policies and inform the workforce accordingly. Misconduct investigations are proportionate and there is a confidence across the constabulary that cases are handled fairly and opportunities for learning are exploited. The counter-corruption unit is effective in protecting the force from corruption but it has limited capacity. The National Decision Model, designed to help staff reach rational decisions, is well understood.

### Summary

There is strong leadership from the chief officers who set the tone for standards of behaviour. Members of staff are in no doubt about the way they are expected to behave at work. Staff and officers are prepared to challenge and are supported when doing so. The Code of Ethics developed by the College of Policing has been launched within the constabulary and the force has introduced a group that considers risks to the organisation, misconduct cases and trends. The National Decision Model, designed to help staff reach rational decisions, is well understood.

A bespoke social media policy still needs to be developed and some other policies are not widely understood by the workforce. The constabulary has not undertaken survey work to understand how integrity issues affect public trust and confidence. Misconduct investigations are proportionate and there is a confidence across the constabulary that cases are handled fairly. The counter-corruption unit (CCU) is effective in the protection of force assets from corruption received but limited in capacity. The constabulary IT systems are monitored and all staff are undergoing a repeat vetting process in line with national guidelines. Drug testing and intelligence-led integrity testing are carried out.

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

The constabulary has worked to keep staff updated on policy in relation to integrity matters but the inspection found that more work was required to ensure that staff are aware of these policies and their responsibilities to comply.

The constabulary has not developed a specific policy on the use of social media.

**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?**

There is strong leadership from the chief constable and his command team who proactively set the tone in relation to setting standards of behaviour and professionalism. Staff are in no doubt about the way they were expected to behave.

The code of ethics has been championed by an assistant chief constable and the plan to instil it within the constabulary is effective.

Governance by the deputy chief constable is effective and risks are being monitored.

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

The police and crime commissioner exercises oversight in relation to chief officer diaries, expenses, gifts and hospitality although this has not been extended to senior officers.

There is a detailed assessment of misconduct cases, which leads to proportionate investigations and confidence across the constabulary that cases and hearings are handled fairly.

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

The CCU produces an annual corruption threat assessment. There is, however, no control plan supporting this threat assessment and HMIC found some gaps in tasking and co-ordination processes.

The vetting programme accords with national standards.

The constabulary monitors social networking sites through technology deployed in the corporate communications department.

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

The office of the police and crime commissioner (OPCC) now cross-checks chief officers' diaries and hospitality appointments against the procurement register to ensure the integrity of procurement.

There is integrity training for new recruits and leadership training. The 'quality matters' programme has raised awareness of integrity issues over the last two years and the new code of ethics has been promoted strongly in constabulary. There are plans to take this further.

**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 police and crime commissioner receives adequate and timely information from the constabulary and actively engages in the monitoring of professional standards and misconduct.

Secondary employments and business interests are understood, however staff are confused about notifiable associations, unclear about proper conduct in relation to gifts, gratuities and hospitality and the policy on social networks use needs to be developed and circulated to staff.

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

The constabulary uses the fast-track dismissal process in an appropriate way and publishes information on the sanctions that have been imposed to the constabulary.

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

The constabulary does not proactively identify groups of staff vulnerable to corruption.

Effective levels of monitoring and quality control in relation to anti-corruption measures are maintained both by the deputy chief constable and by the police and crime commissioner during quarterly scrutiny meetings, where workflow is considered.

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

The constabulary has not developed effective methods to check understanding of policy changes although some areas where new policy has been developed are monitored.

**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 professional standards department (PSD) provides training to recruits and to some courses to improve standards and help prevent future complaints.

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

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

## The force/constabulary in numbers



### Complaints

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

**559**

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

**16.7**

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

**42**

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

**34**

Approvals in 12 months  
to March 2014

**34**



## Resources

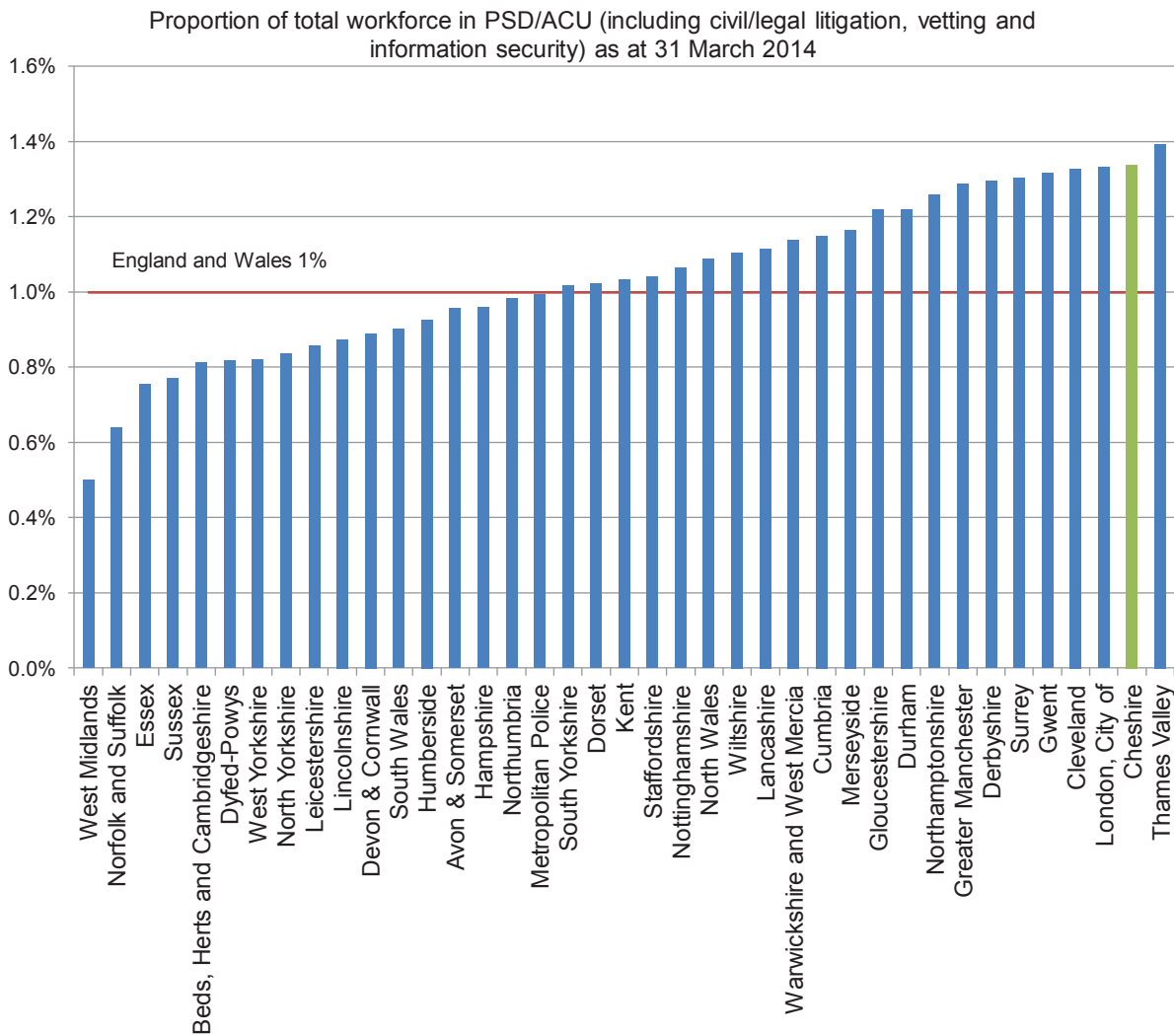
Proportion of workforce in  
PSD/ACU

**1.3%**

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, 13 December 2011. Available at [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, published 18 December 2012. Available at <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, 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?

During the HMIC inspection of 2012, the following areas for improvement were identified for Cheshire Constabulary.

- Keeping staff up to date and aware of policy changes in relation to integrity
- Developing of policy in relation to social media and dealing with potential cases of inappropriate use of social media
- Cross-checking of chief officers' diaries
- Integrity training for staff
- Checking staff members' knowledge of the constabulary's policies

In relation to the first area for improvement, the constabulary has worked to keep staff updated on policy on integrity matters but the inspection found during reality testing that more work was required to ensure that staff were fully aware and that any scope for ambiguity was removed, particularly in relation to the gifts and hospitality policy.

In relation to the second area for improvement, while the constabulary still did not have a specific policy on the use of social media, information about social media was readily available on intranet. The seven cases of potentially inappropriate use of social media referred back to the constabulary in 2012 have been effectively dealt with.

In relation to the third area for improvement, the office of the police and crime commissioner (OPCC) now cross-checks chief officers' diaries and hospitality appointments against the procurement register to ensure the integrity of procurement.

In relation to the fourth area for improvement, there is now integrity training for new recruits to the organisation. Leadership training also has an integrity element. The 'quality matters' programme has raised awareness of integrity issues over the last two years and the new code of ethics has featured strongly in constabulary publications. The programme to cement it within the constabulary is taking shape and begins with workshops run by the assistant chief constable.

In relation to the final area for improvement, the constabulary does not have a specific way to check the understanding of members of staff of policy changes. There had been an increase in the recording of notifiable associations which indicates an increased understanding of the policy but many staff we spoke to during the HMIC inspection had little knowledge of their responsibilities in this regard.

# 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 strong leadership from the chief constable to create a climate of ethical behaviour and willingness to challenge wrongdoing. The chief constable had only been in his post for two months at the time of the inspection. He had already had a number of meetings with staff where he had talked passionately about standards of dress and equipment in the constabulary. He had also spoken about challenging behaviour through use of the performance development review system. Other members of the chief officer team are variously involved in work in relation to the constabulary 'quality matters' programme which is supported by the new chief constable.

HMIC found staff are aware of the boundaries of what constitutes unprofessional behaviour. Officers and staff have seen the results of disciplinary cases published within the constabulary. There has been training about the appropriate use of social media, and the intranet was seen as a good source of information on what was and what was not acceptable. The constabulary even ran a quiz in the lead up to Christmas in 2013 aimed at highlighting the problems often associated with Christmas parties.

Ethical and professional behaviour has been incorporated into many but not all relevant policies and procedures. There is a new discipline and capability procedure which was being considered for implementation in September 2014. The existing policy has been in place since 2009. There is no bespoke social media policy.

Most leaders, including first-line supervisors, generally lead by example and demonstrate their personal commitment to ethical behaviour. They 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 new chief officer contracts include a confidentiality clause and refer to the constabulary's code of conduct. HMIC found a genuine commitment to leading by example in relation to ethics. The recent staff survey, however, showed that staff within the constabulary expected frontline supervisors to be more willing to challenge their staff.

There was evidence to suggest that unethical and unprofessional behaviour was being appropriately challenged. The inspection found an example of a case reported to the constabulary in which a search warrant had been executed and an officer had forced the door without grounds to do so, claiming he saw someone in the premises when he could not have done so. The inspection also found throughout interviews with support groups, staff associations and other groups that there was a passionately held belief that challenging inappropriate behaviour was now routine in the constabulary.

The constabulary has plans to communicate and instil the new code of ethics effectively. Implementation of the code is led by an assistant chief constable. There have been a series of seminars held with senior leaders where the code and case studies, including ethical dilemmas, have been presented. It has been robustly communicated that there is a responsibility to distribute and share the lessons learned from the presentation throughout the constabulary and the seminars have been described as very hard hitting. The code features prominently within the constabulary newspaper and on videos and the constabulary is considering how to incorporate it alongside the current constabulary values and the Nolan Principles, which are intended to guide those holding public office on ethical matters.

Members of staff are aware of their responsibility to challenge and report misconduct and unprofessional behaviour, and stated they felt supported when they do so, irrespective of their rank, role or experience. Audits of the constabulary's response to situations where support was required are undertaken by senior officers. HMIC's work with focus groups within the constabulary showed that officers and staff were willing to report matters, whether directly to the professional standards department (PSD), through anonymous reporting systems or directly to their immediate line supervisors. The constabulary is also able to demonstrate appropriate levels of support to those coming forward to report wrongdoing.

There is a policy outlining the obligation to declare any change in circumstances in the personal associations and relationships of officers and staff where they might place individuals or the organisation at risk. The policy is readily available by searching the constabulary intranet. During focus groups, however, the inspection found that there was a lack of understanding and knowledge of the policy. HMIC found examples of staff members having to be prompted by others to report associations that might cause concern to the constabulary. Officers and staff have clearly not been routinely briefed in relation to their obligations around notifiable associations.

## 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 in use at all levels in the constabulary; officers and staff are trained in and understand its application. It is part of the officer safety training and also used in command training as well as a number of other training courses attended by staff. Questions on how to make effective decisions are asked by promotion and selection panels.

The 'quality matters' programme has been a major vehicle for Cheshire Constabulary to profile expected standards and professionalism to staff over the last two years and it is evident that progress had been made. Training on ethical and professional behaviour is delivered regularly to all staff and knowledge is checked. Despite inclusion of examples of ethical dilemmas in the code of ethics presentation, however, regular training does not include unconscious bias or lessons on recognising dilemmas. HMIC were reassured that as the code of ethics training is disseminated across the county, it will make reference to such issues.

Chief officer leadership for integrity issues is explicit, visible and recognised by staff. This leadership encourages positive behaviour, explains boundaries of acceptable behaviour and is encouraging a culture in which wrongdoing is challenged and reported. This style of leadership is evidenced by messages on the internal website, posters, and in any briefing to staff from chief officers. The inspection found the chief officer team was proactive in promoting integrity issues. The deputy chief constable chairs the constabulary reputation management group and arrangements have been made to ensure the PSD retains staff numbers despite austerity measures elsewhere in the organisation. In addition, there have been a number of articles in the constabulary newspaper and on the force intranet dealing with ethics and integrity.

HMIC found that the constabulary and the police and crime commissioner (PCC) were actively engaged with governance arrangements in relation to professional standards. The PCC meets regularly with the deputy chief constable, both formally at key meetings and also informally as required. He therefore can effectively oversee emerging integrity and conduct issues and he commented that chief officers were providing him with sufficient information to enable effective governance and accountability on integrity issues. In addition, the office of the police and crime commissioner conducts robust cross-checking of chief officers' diaries against the procurement register and the gifts and hospitality register. The PCC, through his deputy, also routinely examines a sample of complaints and investigations by the PSD; he has challenged the constabulary on several occasions.

Integrity issues are actively monitored by chief officers at governance meetings in a way that allows them to understand the issues fully and identify the need for action. The deputy chief constable chairs a monthly reputational risk meeting which is attended by the PSD, human resources, the CCU and the corporate communications department. At this meeting, risk issues including trends in complaints and misconduct are discussed. The constabulary has recently appointed a constabulary monitoring officer who is also the constabulary solicitor. His role is to monitor ethical standards of behaviour as well as to ensure legal and financial prudence. The role has only recently been established and it was not possible to assess its effectiveness at the time of inspection.

Policies and guidance clearly explain the meaning of misconduct and unprofessional behaviour and describe the acceptable boundaries and what is expected of staff in their professional but not in their private life. Policies are reviewed bi-annually. There are a number of policies that set out the acceptable standards of behaviour for officers and staff on the intranet. These are mainly available on the PSD intranet pages and guidance and videos on the code of ethics are available on the 'quality matters' intranet pages as part of that ongoing programme. Guidance on out-of-work conduct is covered by policies such as the notifiable associations policy but the direction is less specific. In particular there is no policy on, or guidance around, the use of social media networks by the workforce

## Understanding integrity

No survey work has been undertaken to understand how integrity issues affect public trust and confidence. The constabulary has conducted customer satisfaction surveys and has recently completed an internal staff survey but has not looked externally at integrity issues and their effect on public perceptions, trust and confidence.

Details of only some occasions where officers and staff were offered gifts or hospitality are recorded fully, and there is some failure to record occasions where gifts or hospitality are offered but not accepted. There is a central register and an effective audit process. The focus groups and reality testing, however, showed that knowledge and understanding of what was acceptable as a gift and as hospitality was limited. There was a lack of understanding about the need to record those offers of gifts and hospitality that had been declined.

## Recommendation

**Within six months, the force should ensure that it has a policy which informs staff of the gifts and hospitality that are appropriate to accept and why. The policy should include the requirement to register the value and description of all gifts and hospitality offered, including those declined. This should be communicated to all staff.**

Details of all occasions where officers and staff have applied for authorisation for a business interest and secondary employment, including those occasions on which authorisation was withheld, are recorded fully in a centrally held repository, which is regularly audited. Authorised applications are reviewed for renewal at regular intervals. The PSD reviews each case every twelve months. There are, however, still entries relating to officers and staff who have left the service and a process to weed these out is therefore in place. Cheshire Constabulary does not routinely check that, where applications for business interests are refused, the disappointed applicant complies with the refusal but would do so if intelligence were received to suggest that it was necessary.



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

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Some analysis has been carried out to identify trends in relation to integrity issues and a problem-solving approach has been taken for those that are identified. The inspection found that the office of the police and crime commissioner regularly and robustly cross-checks the diaries, expenses and gifts and hospitality entries of the chief officer team against the procurement register. The constabulary, however, does not do this for senior officers and this should be addressed to ensure any inappropriate links are identified.

## 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 decisions are made to transfer officers to specialist roles and to promote them to any position. This includes applications for courses such as the strategic command course (SCC), the pathway to chief officer rank and other accelerated promotion schemes for more junior ranks. The constabulary also routinely considers personal development review (PDR) documents when promoting or transferring officers to specialist roles. These documents contain disciplinary findings. Normal vetting procedures apply for fast-track scheme and SCC applications.

Cheshire Constabulary ensures that all staff, irrespective of rank or role, are treated fairly and equally in terms of how investigations are assessed, recorded, investigated and sanctions imposed. The same person assesses the severity of cases involving police officers and police staff. The inspection found evidence of carefully considered and well-articulated rationales in the assessment of cases. The constabulary have asked the College of Policing to work with them in addressing the issue of unconscious bias. Care is taken to ensure that those staff members sitting in judgment on disciplinary panels are not personally involved in the case. Staff associations and unions are also actively involved in providing support and advice.

There are confidential mechanisms, supported by a policy, through which staff can report wrongdoing. These include telephone, email and the intranet. The constabulary uses the Crimestoppers integrity line. The number is accessible through the constabulary intranet, as is guidance on its use. HMIC found that staff were using this avenue to report alleged misconduct and in general there was a climate in which staff felt confident about reporting misconduct and unprofessional behaviour by individuals or groups. The inspection found a very positive approach across the constabulary in this area. Everyone with whom HMIC spoke felt sufficiently confident to report wrongdoing, whether through confidential means, to an immediate supervisor or manager, or directly to the PSD. All felt that they would be supported, both by the organisation and by immediate colleagues. HMIC found that this was a real area of strength.

HMIC found that the constabulary responded to reports of wrongdoing by staff in an effective and timely manner. Complaints made by members of the public are in fact often resolved by a sergeant at the first point of contact. The constabulary provides data on timeliness and quality of complaints handling to the scrutiny committee. The constabulary publishes: data and information in relation to the gifts and hospitality register (covering all officers and staff and including accepted and rejected offers); expenses of chief officers, senior officers, and police staff equivalents; the register of business interests; and the outcomes of misconduct hearings.

The inspection team found that misconduct outcomes were published widely within the constabulary in the weekly orders although the names of those involved were redacted. Gifts and hospitality data are also published, although at the time of the inspection it was difficult to find due to IT search engine problems.

Officers and staff receive regular training on integrity issues and know their obligations to challenge misconduct. They are also aware of mechanisms for reporting wrongdoing. The code of ethics training, which includes examples of ethical dilemmas, has started for senior managers and is being led by an assistant chief constable. It has been communicated that this training will be promulgated across the constabulary.

It was apparent from the small selection of case files examined that in any case requiring Independent Police Complaints Commission (IPCC) referral, that referral had been made. There has been some dissemination of the IPCC bulletin which highlights cases to illustrate areas for improvement and learning by forces. However, there is scope for better and more targeted distribution. An example was given of a recent IPCC bulletin which contained lessons on Taser deployment. Although this had been circulated around the PSD management, there was no evidence to suggest that it had reached officers actually involved in Taser deployment. Furthermore, interviews with a number of staff, including local area senior managers, suggested that the bulletin was not sent broadly across the constabulary.

## Professional standards training and resourcing

The investigators in the PSD are all detectives. Members of staff in the PSD and CCU have received some training for their role, but not on a regular basis. The constabulary has not taken up the College of Policing PSD investigators courses although the head of the CCU was due to attend a College of Policing counter-corruption course. HMIC found some training has been delivered within the CCU on researching open-source intelligence but most of the training is delivered through on-the-job experience. Overall, there was significant experience within both the CCU and PSD but no specific employee development plan.

Succession planning takes place to ensure consistency in the PSD and CCU. The inspection found that careful consideration was given to staff recruited to the posts within the PSD. The head of PSD can retire in 2015 and two credible candidates have been found with the necessary skills and experience to take his place. There is a temporary detective chief inspector in post within the department. Although there are no current vacancies, the head of department is aware of a forthcoming vacancy and has plans to deal with it together with contingency plans in the event that the post is not filled immediately.

HMIC found that the PSD was sufficiently resourced and qualified to enable some preventive work to be carried out but this capability was limited. Although the CCU has been involved in giving presentations to courses and recruits, focus group work highlighted that the CCU was working at capacity

Misconduct hearings are structured so as to ensure transparency, effectiveness, efficiency and legitimacy. This structuring includes the use of an appropriately qualified presiding officer who is independent of the person investigated. Inspectors and chief inspectors in the constabulary are trained to run misconduct meetings and there are plans for a barrister to advise the chief officer team on how to run effective and transparent misconduct meetings. The constabulary makes use of fast-track dismissal where appropriate and interviews with staff associations found a high level of satisfaction and confidence in the integrity of the misconduct process.

## Quality assurance

HMIC found that Cheshire Constabulary regularly audited decisions in disciplinary hearings and meetings resulting from allegations of misconduct or unprofessional behaviour against officers and staff. The head of the PSD conducts a final severity assessment of cases and is aware of the outcome of meetings. All cases are also reported to the constabulary scrutiny committee. In addition, there is also regular and robust monitoring and the deputy police and crime commissioner routinely examines a sample of complaint and misconduct files. The constabulary is in the process of forming an ethics committee where themes emerging from complaints and misconduct cases will be considered.

Regular audit is taking place to ensure that investigations were justifiably dealt with at the right level and reviewed where necessary. The deputy chief constable meets with the head of PSD three times a week and is made aware of the details of misconduct outcomes. The timeliness and quality of all investigations conducted, in relation to officers and staff (whether they were carried out by PSD or another department), is thus assured. A performance report is presented to the scrutiny committee that identifies the number of new complaints and the percentage of complaints that are upheld and the average number of days that it takes the constabulary to finalise cases. HMIC found that 22 percent of complaints cases investigated were upheld. Cheshire Constabulary therefore upholds a high number of complaints when compared to the rest of the nation. At the time of inspection, it was found that it took an average of 85 days to finalise a complaint.

The PSD oversaw some police staff investigations which were carried out by other departments and by managers in local areas. All public complaints are assessed for severity by the PSD, and this department directly manages all serious, sensitive and complex cases. About half of the remaining cases are sent to local areas for resolution. This practice appears to be undermining both the quality and timeliness of investigations. There are, nevertheless, two complaints managers within the PSD who monitor all complaints.

HMIC found there was a process to record lessons learned from misconduct investigations, and disseminate these to the workforce effectively. Details of the sanctions that are imposed are published in constabulary orders in order to demonstrate how unacceptable conduct is penalised. The IPCC bulletin is not, however, widely read or understood within the constabulary. Each complaint investigation has a lessons learned box within it and the complaint is not closed unless the box has been completed. The PSD also contribute to constabulary debriefs and various courses and training programmes where these lessons can be shared.

## Recommendation

**Within six months, the force should ensure it has an effective way to communicate to all staff, both locally and nationally, identified lessons to be learned on integrity and corruption.**

There is a policy and consistent decision-making on suspension, resignation and retirement during investigations. Staff and officers are actively encouraged to resign their post if it is believed that ultimately they will lose their job. In such cases, the details of the person in question are entered on the national police personnel disapproved register. Any criminal proceedings in such cases continue regardless of the resignation. There have been no cases where people have asked to retire while under investigation in Cheshire Constabulary. The deputy chief constable is responsible for decisions to suspend officers or staff and actively looks to reassign duties rather than suspend staff. The constabulary complies with the requirements set out in *R v PCC Lincolnshire (ex parte Rhodes)*.

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

## Investigating corruption

HMIC found that Cheshire Constabulary regularly, proactively and effectively identified and managed threat, risk, and harm from corruption as part of its governance structure. This governance structure does not include procedures to assess and mitigate risk or monitor those responsible for taking action and hold them to account

The constabulary monitors the use of its information systems and uses keystroke software, a means of monitoring the use of computer keyboards. It also monitors telephone usage.

HMIC found limited evidence of how the constabulary proactively identifies staff groups that may be at risk from corruption, for example by the use of informants, from inside or outside the organisation.

## Recommendation

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

Vetting arrangements, however, comply with the national vetting policy and identify corruption risks at the recruitment stage for both officers and staff. They are revisited before promotion to senior ranks or posting to sensitive or vulnerable roles. The constabulary vetting officer reports directly to the head of the PSD. The constabulary is in the process of re-vetting all staff and was, at the time of the inspection, half-way through that process.

HMIC found that the constabulary proactively and regularly monitors constabulary systems and social networking sites and takes proportionate action when appropriate. Corporate communications are responsible for live-time monitoring of constabulary social media accounts including Twitter and constabulary Facebook sites. Software is in place that prevents officers or staff putting inappropriate words onto these accounts and records any attempts to do so.

The constabulary uses random and 'with cause' drug testing, and intelligence-led integrity testing to identify corruption but results are not circulated to the workforce. If a member of staff tests positive on a drug test, the result of the misconduct case will be published in constabulary orders but the number of tests conducted is not disclosed.

The constabulary ensures that organised crime investigations are not compromised by risks of corruption and protect forthcoming operations from such risks. The CCU attends meetings held to discuss forthcoming serious crime investigations and advises on operational security. There is a monthly meeting with the chief constable where the PSD updates him on current threats from organised criminal groups (OCG). The CCU also submits data to the constabulary OCG scoring matrix on any threats of corruption from those groups. In addition, the CCU ensures that where necessary staff assigned to those operations are vetted. The constabulary ensures the effective security of systems and exhibits. Case files are managed electronically and the constabulary recognises an increased risk of unauthorised access. Proactive covert flags are put on electronic files so as to alert the PSD to any attempts to view their content. There are also so-called challenge screens in use where staff are required to say why they need to view a file. Reality testing showed that access to police stations was secure and well-controlled but the head of PSD commented that case papers stored at police stations were at risk of being interfered with by a corrupt officer or member of staff. Reality testing further confirmed that the constabulary did not operate a clear desk policy in police stations.

## Intelligence

The constabulary proactively and regularly gathers intelligence on corruption and grades it in compliance with the Authorised Professional Practice and the national intelligence grading system. Police informants and the anonymous integrity line are also used to some extent. When a report is received, the CCU will review internet and phone usage of the suspect as well as intelligence from other systems.

There is a co-ordinating process in place through which corruption issues and necessary responses are considered, and recorded although HMIC found actions were not routinely allocated or reviewed. HMIC found many of the procedures within the PSD are informal; no minutes are taken of meetings, and those responsible for taking action are not identified. This issue has been addressed by way of a recommendation earlier in this section.

There was some good evidence that the constabulary had, when dealing with corrupt officers, been able to broaden their investigation so as to identify multiple offenders from a single suspect or multiple offences from an apparently single offence. There is a routine audit on the use of constabulary systems. HMIC were given an example of one occasion on which intelligence was received that an officer was buying drugs. Examination of his personal telephone led to identification of other staff who were involved. The use of the keystroke software monitoring tool mentioned above has proved effective in supporting this kind work.

## Capability

The PSD and CCU have ready access to specialist assets when required including, for example, technical support and surveillance. Surveillance authority requests are examined by the designated authorising officer, but arrangements are in place for sensitive applications to go through a neighbouring force. There is also good support within the region, for example, when additional surveillance resources are required. The CCU uses staff within the high-tech crime unit and has access to National Crime Agency assets when necessary.

As intelligence is received, proactive work is done to develop it into an actionable product but the force could do more to proactively gain intelligence in the first instance. The focus group involving CCU staff revealed that much of the investigators' time was spent developing intelligence rather than investigating. The group felt, for example, that they should be proactively seeking intelligence from women's refuges and sex workers but had insufficient resources to do so. There were, however, 250 referrals to the CCU last year and they were all investigated.

Workload has increased due to developments in technology, which allow better monitoring of systems. The constabulary do not, however, exploit this opportunity to scrutinise systems more closely due to the current level of resourcing.

The performance of the PSD and CCU is regularly monitored in particular with respect to the timeliness and quality of complaints-handling, investigations, decision-making, outcomes and appeals. There is a quarterly scrutiny meeting with the PCC where the workflow of the PSD and CCU, including live and outstanding cases, is considered.

HMIC found the constabulary ensures that lessons are learned from misconduct investigations and disseminated to officers and staff. There is, however, scope for improvement. Outcomes of misconduct hearings are published. The 'integrity matters' programme is used to educate staff and chief officers have, on occasion, debriefed teams to discuss the impact of fairly high profile events that involved misconduct. Focus groups revealed, however, that there was little awareness of the IPCC 'lessons learned' bulletin and that messages on these issues were not consistently getting through to the front line.

Cases are appropriately referred to the IPCC in accordance with statutory guidance. The deputy chief constable is aware of all cases that were referred. An examination of a small number of case files showed that those cases which needed IPCC referral had been correctly referred.



# Recommendations

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- **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 a policy which informs staff of the gifts and hospitality that are appropriate to accept and why. The policy should include the requirement to register the value and description of all gifts and hospitality offered, including those declined. This should be communicated to all staff.**
- **Within six months, the force should ensure it has an effective way to communicate to all staff, both locally and nationally, identified lessons to be learned on integrity and corruption.**
- **Within six months, the force should ensure that it has the proactive capability to effectively gather, respond and act on information which identifies patterns of unprofessional behaviour and corruption.**