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# Police Integrity and Corruption

City of London Police

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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?	13
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?

The City of London Police has made progress since the 2012 HMIC inspection. The Commissioner and his chief officer team set high standards in terms of conduct and behaviour and other senior leaders understand their responsibilities to maintain and promote these standards throughout the force. HMIC found that unethical and unprofessional behaviour was appropriately challenged in the force and that officers are aware of their own individual responsibility. The force actively and effectively identifies and manages threat, risk and harm from corruption. The force has recently initiated a mandatory e-learning training package on the Code of Ethics.

### Summary

The City of London Police has made good progress in making sure officers understand values and professional behaviour across the organisation. The Commissioner and his chief officer team set high standards in terms of conduct and behaviour and other senior leaders understand their responsibilities to maintain and promote these standards throughout the force.

There are strong examples of officers immediately challenging and reporting unprofessional behaviour. However we did find some evidence of reluctance amongst a limited number of officers to report wrongdoing.

Officers and staff are aware of the boundaries of professional behaviour and understand how it affects both the public and their colleagues. The force is reinforcing professional boundaries through a programme of workshops on integrity and professional standards. The force has recently initiated a mandatory e-learning training package on the Code of Ethics.

The force takes all reasonable steps to ensure that organised crime investigations are not compromised. However we did find insufficient resources within the counter-corruption unit (CCU) to effectively deal with the flow of intelligence.

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

Three areas for improvement were identified.

There was no monitoring in place to cross-reference contract and procurement registers with the gifts and hospitality register to ensure the integrity of the procurement process.

There is now a policy on second jobs and business interests with annual reviews.

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

The chief officer team demonstrated leadership through their active sponsorship of the 'city first' and 'city futures' organisational change programmes.

Officers and staff have an awareness of the boundaries of unprofessional behaviour and how it affects the public.

Some staff did display some hesitation about challenging peers and certainly higher ranks.

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

There was a developing climate where officers felt comfortable to challenge unprofessional behaviour.

The force has adequate governance mechanisms in place to ensure the timeliness and quality of all investigations conducted by the professional standards department (PSD).

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

The force actively and effectively identifies and manages threat, risk and harm from corruption.

The force has made progress in developing a process for the proactive identification of staff/groups vulnerable to corruption.

The force uses random and intelligence-led drug testing, but not intelligence-led integrity testing, to identify corruption.

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

Good progress on training has been made with a programme of workshops on integrity and professional standards and computer based learning.

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

The force has advanced plans in place to communicate the Code of Ethics to staff across the force.

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

The counter-corruption unit (CCU) receives regular training for its role. CCU staff have all completed the appropriate College of Policing (CoP) course in counter-corruption. The CCU has access to surveillance trained officers.

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

The PSD and the CCU have ready access to specialist assets when required.

# The force/constabulary in numbers



## Complaints

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

87

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

7.6

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

16

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

1.4

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

2.6



## Business interests

Applications in 12 months  
to March 2014

**29**

Approvals in 12 months  
to March 2014

**31**



## Resources

Proportion of workforce in  
PSD/ACU

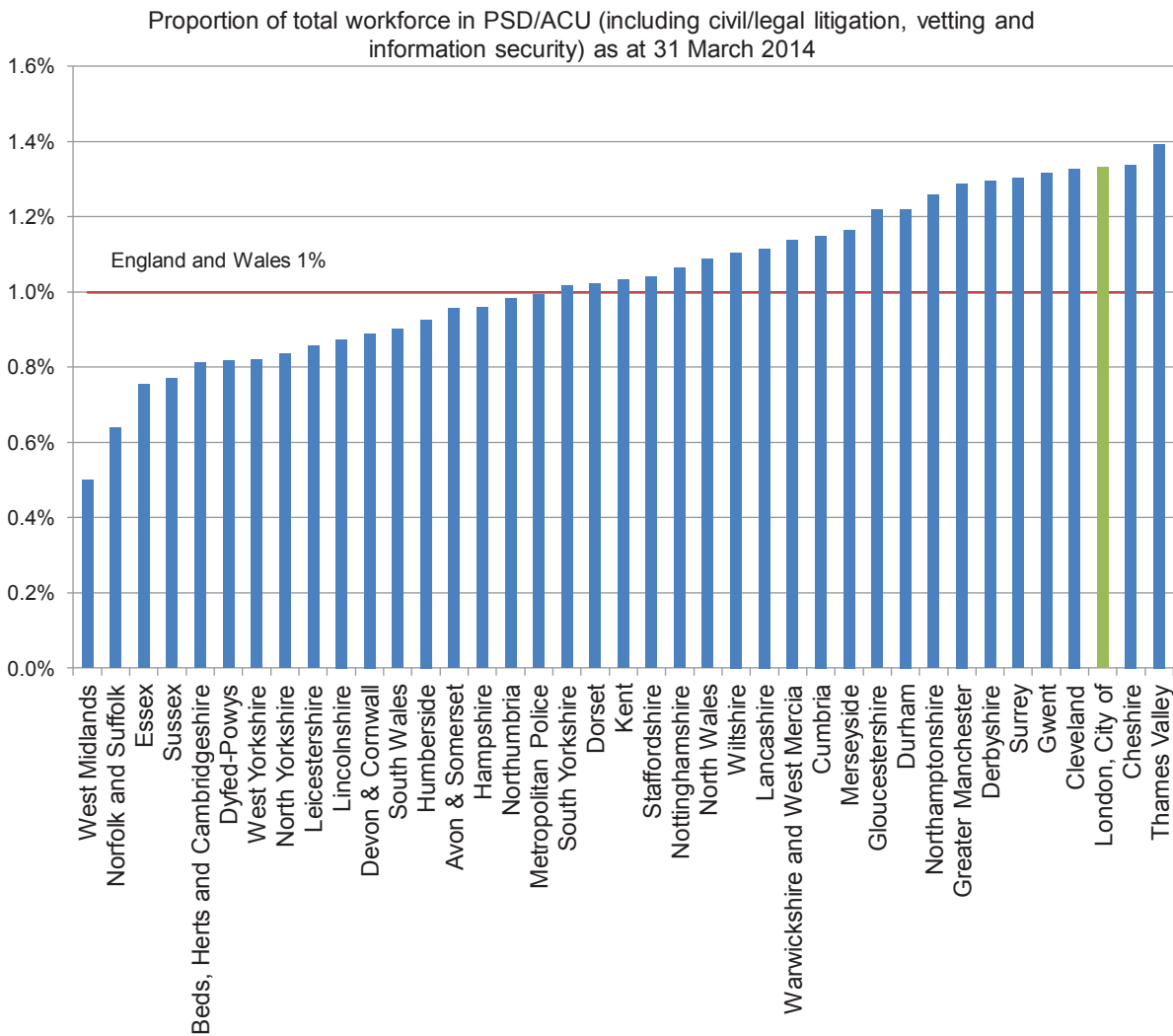
**1.3%**

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?

Three areas for improvement were identified for the City of London Police in the HMIC 2012 integrity report.

Overall the City of London Police has made progress on those areas.

- (1) On the last inspection, we found there was no monitoring in place to cross-reference contract and procurement registers with the gifts and hospitality register to ensure the integrity of the procurement process.
- (2) The finance department now manages the use of all corporate credit and procurement cards and refers management information and any suspicious spending to the professional standards department (PSD).
- (3) There is a system of checking in place for the issue and use of corporate credit cards, which relies upon line manager authorisation. We found all suspicious transactions would be referred to the PSD. The City of London Corporation (hereafter referred to as the Corporation) had conducted a spot check of corporate procurement cards.

## Second jobs and business interests


On the last inspection we found no policy in relation to those seeking secondary employment, and no review mechanism for those with secondary employment.

The City of London Police has now introduced policy for police officers seeking approval to have secondary employment or to register a business interest. All applications have to be assessed and approved by the PSD. All registered second jobs are subject to an annual review. Since September 2011 there have been no applications for secondary employment.

We found that officers and staff were aware of the policy and the need to declare any business interests. HMIC saw evidence that an annual review of business interests takes place.

## Integrity training

On the last inspection we found the PSD only provided new recruits with information about the appropriate use of social media networks. Changes to policy were communicated to staff via email, intranet systems and posters placed in police stations. Information about public complaints and discipline cases (called 'lessons learnt') is circulated to highlight integrity-related issues.



Since the last HMIC inspection, the PSD has begun a programme of workshops on integrity and professional standards. These are for first and second line supervisory levels. The force intends to cover the rest of the workforce throughout the rest of the year. In addition e-learning is being rolled out across the force to inform staff of the new police Code of Ethics. This includes an online knowledge check.

# 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

The force has made good progress in ensuring staff understand the force values and how they drive professional behaviour and leadership. This is led by the commissioner and assistant commissioner and supported by two organisational change programmes, 'city first' and 'city futures'. The police committee (the local policing board) has a nominated lead to oversee all aspects of professional standards within the force through the professional standards and integrity police committee sub-group (PSIPCSG). We found that chief officers set high standards in terms of conduct and behaviour and other senior leaders understood their responsibilities to maintain and promote these standards throughout the organisation. The commissioner uses a weekly blog to update staff and this is used to promote integrity and professional behaviour. However we found that this vision was not so clearly understood among middle managers and the force accepts that continued effort is required to ensure a consistent high level of understanding is achieved by supervisors throughout the force.

Officers and staff have an awareness of the boundaries of professional behaviour and understand how it affects both the public and their colleagues. During focus groups we found that although there was an understanding of acceptable professional boundaries, we found less understanding of the governance arrangements for police staff when compared to those of police officers. For example, police staff are employed by the corporation and are subject to the 'code of conduct', whereas police officers are subject to the Code of Ethics. However supervisors and staff were unclear if one code took primacy over the other. A review of gifts and hospitality highlighted the disparity between officers and police staff, whereby police staff, unlike officers, are permitted to accept gifts and hospitality below a £25 threshold without making any declarations. HMIC acknowledges the difficulties in ensuring consistency with two distinct structures in place, but clarity should be communicated to all staff.

## Recommendation

**Within six months, the force should communicate to all staff, informing them with which professional code they need to comply and any circumstances where another code of profession takes precedence.**

A variety of ways to promote professional standards and integrity across the force have been introduced. The PSD has commenced a programme of workshops on integrity and professional standards, initially targeting first and second line supervisors. Workshops for the rest of the workforce will however be completed by the end of 2014. The PSD holds seminars for new recruits and gives briefings to sergeants and inspectors as part of their leadership training.

The force has recently initiated the 'Triple A' system, a mandatory e-learning training package on the Code of Ethics. The structure of the Triple A system ensures that staff read and understand the Code of Ethics by taking a compulsory exam. Staff are required to obtain an 80 percent pass mark and to retest until a pass is achieved. To improve the flow of information between the PSD and the rest of force, an officer within each directorate has been given the specific responsibility for being a point of contact with the PSD. These officers are the link between PSD and the wider workforce and assist in the reinforcement of boundaries and professional behaviour. The introduction of individual members of staff with responsibility for communicating information is positive but HMIC found that there had been no guidance on the role and that this had led to some inconsistencies in how information was circulated from PSD to other areas in the force. The force accepts this and has agreed to introduce a statement of expectations that will provide officers performing this role with guidance and clarity of purpose.

Expectations on ethical and professional behaviour are apparent in force policies, supported by standard operating procedures (SOPs). The professional standards police committee sub-group (PSPCSG) provides external scrutiny of the force's SOPs. During focus groups staff described confusion over the large number of SOPs and what they all meant. The strategic development department recognises this problem, and intends to streamline all policies to underpin the Code of Ethics by the end of 2014.

The force has responded to the Code of Ethics through the development of an integrity standards board (ISB). The ISB has introduced a comprehensive set of measurements that allows the force to better understand areas of risk. The force has also incorporated a set of integrity questions into a staff survey conducted in 2014, asking whether staff viewed the force as an ethical employer. The results of the staff survey have been used to develop the fairness and integrity strand of the force's leadership training programme and are also used to improve the PSD workshops.

There was evidence within the City of London Police that most leaders demonstrated a personal commitment to ethical behaviour and standards. A starting point for leadership commitment was the direction provided by the 'city futures' organisational programme. The foundation of this programme was a focus on all staff acting with integrity and professionalism. To support this objective the PSD has contributed to the sergeants/inspectors leadership training, as well as being tasked by the assistant commissioner to develop supervisor specific Code of Ethics training.

HMIC found that unethical and unprofessional behaviour is challenged in the force. Examples were provided in which both peers and supervisors had appropriately and promptly challenged inappropriate behaviour. However staff did display some hesitation in their desire to challenge peers and higher ranking officers. This is not assisted by the small size of the force and the feeling amongst staff that "everyone knows everyone". The force is aware of this issue and had identified a reluctance to challenge during the initial city futures workshops.

Responsibility for the delivery of the Code of Ethics along with integrity currently rests with the head of the strategic development department. Once the Code of Ethics has been communicated to all staff, responsibility for oversight will move to the human resources department.

At the time of the inspection, it was clear the force had undertaken a lot of work to introduce the Code of Ethics. For example: the publication of the draft Code of Ethics on the force intranet; the commencement of e-learning; an introductory article on the Code of Ethics in the internal staff magazine; and a link on the force intranet, all show the force's commitment. In addition the force has linked the Code of Ethics to the performance review process and SOPs for recruitment of officers and special constables. The Code of Ethics have been incorporated into lessons for initial student officers including special constables and included it on all leadership courses for sergeants and inspectors. The force intends to consult staff associations on the dilemmas faced by staff in understanding the code, and how the force can assist with this process.

HMIC found that officers are aware of their responsibility to challenge and report misconduct and unprofessional behaviour. HMIC noted strong examples of officers immediately challenging and reporting unprofessional behaviour, which was a positive indicator of the developing climate to challenge wrongdoing within the force. The PSD is bolstering officers' knowledge on reporting responsibilities through intranet and poster campaigns along with the PSD workshops. In focus groups we found that staff saw 'city futures' was about all staff promoting a culture whereby unprofessional behaviour can be challenged with great confidence.

There is a clear policy outlining the obligation to declare any change in circumstances in personal associations and relationships and most staff are aware of their obligations in this regard. The force's 'professional standards reporting' and 'notifiable association' SOPs include relevant guidance on the criteria for an association requiring declaration and the corresponding reporting responsibilities. HMIC found evidence that officers generally understood the parameters of reporting and where necessary sought guidance from line managers. All notifications are reviewed by the PSD and maintained on a database in the unit, with authorisations only following a personal interview conducted by the detective sergeant in the CCU.

Chief officers provided sufficient information to the police committee to enable effective governance and accountability on integrity issues (including misconduct and unprofessional behaviour). A professional standards police committee sub group receives information on misconduct and unprofessional behaviour cases. Independent members of the sub-committee include a Justice of the Peace and a barrister who examine every finalised police complaint. In addition the force has an integrity standards board (ISB) and a PSD working group (PSDWG). These groups provide 'lessons learnt' from their scrutiny of complaints and misconduct cases into the organisational learning forum (OLF).

The force has responded to the Code of Ethics by introducing an integrity checklist which is reviewed quarterly at the ISB. A health check is conducted on the following integrity measures: civil cases; force mobile phones; corporate credit card transactions; use of force forms; expense claims; business interests (BI) analysed – police; business interests (BI) analysed – civilians; media contacts; information security; gifts and hospitality (G and H) and vetting refusals.

## Understanding integrity

Through the staff survey, questions were asked to help the force understand how integrity issues (including misconduct and unprofessional behaviour) affect public trust. This includes surveys of officers and staff, the general public, and youth groups. Staff are now asked two questions. The first: 'the City of London Police is an organisation that encourages staff to act with integrity', found 73.3 percent of staff responding agreeing while 16.9 percent disagreed. The second question was: 'are you more or less satisfied with working for the City of London Police compared with a year ago', 21 percent of staff answered that they were more satisfied while 61.1 percent stated that they were less satisfied. The strategic development department is responsible for taking action following the results of the survey. The force states that it intends to survey the general public, however this is in early stages of development. Since the results of the staff survey indicated a higher level of dissatisfaction within the organisation than the previous year the force should consider whether staff satisfaction should be included in a wider communications strategy.



Details of all occasions where officers and staff are offered gifts or hospitality are recorded on a centrally held register. The register does not record whether the gift or hospitality is not accepted. However we found that chief officers did record when a gift or hospitality was not accepted. Inappropriate entries are challenged or investigated. Any concerns raised are referred to the PSD for review and action. In addition all offers and acceptances are subject to appropriate line management authorisation and quality assurance.

The force website publishes a register of gifts and hospitality for chief officers and directors and we found evidence of accepted and declined events. HMIC found that the commissioner has provided very clear communication to all staff in the City of London Police on the standards and boundaries he expects regarding the appropriateness of acceptance of gifts and hospitality. However in most areas this has translated into a blanket refusal of any and all hospitality offered during the working day. The force's gifts, hospitality, and donations SOP for police officers clearly states that the acceptance of light refreshments as common courtesy in line with policing duties does not amount to any breach of integrity. The gap in knowledge displayed by officers highlights the need for the force to re-publicise the policy to ensure that officers take a proportionate approach.

## 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 when officers have applied for authorisation for a business interest are recorded on a central system (including cases in which the application was not authorised). The force uses a comprehensive approach to assess the veracity of applications, seeking input from directorate heads and a review of the PSD held complaints and misconduct data, before final authorisation. Any rejected applications are recorded and stay with the PSD. If any intelligence comes to notice that is relevant this can be re-assessed. A police sergeant in the PSD has responsibility for all force business interest applications and reviews them once a year. Further action is taken if prompted by the receipt of additional intelligence that officers are breaching their rejection.

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

### Misconduct and unprofessional behaviour

Analysis has been carried out by the PSD to identify trends in relation to integrity issues, including misconduct and unprofessional behaviour. However the majority of the work undertaken by the analyst in the PSD is to provide management information rather than interrogate the raft of data available on force systems.

Misconduct and unprofessional behaviour are considered in decision making in relation to transfer to specialist roles and promotion for all positions; including applications for the strategic command course (SCC) and fast-track programmes for police officers and staff. Movement to specialist roles and on promotion are subject to rigorous vetting checks, reviewing misconduct and complaints data in the process. In addition to the appraisal of internal applicants, the force also verifies integrity and professional standards for all transferees, new recruits and special constables.

There was limited evidence that the force evaluates how misconduct investigations are assessed and recorded to ensure that all officers and police staff, irrespective of rank or role, are treated fairly and equally. The force uses a severity assessment form to evaluate whether each activity constitutes a criminal offence or justifies starting disciplinary action. The PSD is responsible for the investigation of all cases of officer misconduct, along with cases of officer and police staff gross misconduct. Outside the initial severity assessment there was no evidence to suggest to HMIC that the force reviews investigations to confirm transparency and proportionality in the process across the force. We did find evidence of a peer review conducted by the human resources department. This related to a perception from a staff association that minority groups were being treated less favourably within the force. The peer review found that statistical data did not support the perception and the force continues to work with the all staff associations and will act to address issues when they are brought forward.

There are confidential and overt methods, supported by clear policy, for staff to report wrongdoing. The 'professional standards reporting' (implemented June 2012) and 'PSD confidential' (implemented June 2012) SOPs confirm the range of options available to staff. The PSD confidential email based system is the primary confidential mechanism. Staff also have the opportunity to report wrongdoing via line management, the use of an independent telephone reporting service called 'Safecall' and through the staff associations.

Officers and staff are generally aware of the confidential reporting mechanisms in place and would use them if they needed to, however evidence from focus groups indicated that Safecall was not widely known about across the force. The force acknowledged that Safecall had not been used as a reporting tool in the last 12 months. The force must consider whether it has been sufficiently publicised as an option for staff. The force has confirmed that there are plans to introduce an anonymous email system to bolster Safecall.

Staff in focus groups reported they feel confident to report misconduct and unprofessional behaviour by individuals and groups, and examples of challenge were provided during the inspection. The recent force survey indicates that 73.3 percent of the workforce felt that the organisation encouraged staff to act with integrity. However discussions with staff and relevant staff associations raise a degree of concern over the possibility of adverse consequences should staff report wrongdoing. HMIC found that there were perceptions that any challenge would impact on career prospects due to the size of the force.

During inspection HMIC was made aware of a 'broadcast' system (electronic communication), which publishes suspensions providing details of the officer's name to all members of staff. During interviews and focus groups, officers and staff felt that the broadcast of suspension was wholly inappropriate as it did not provide any context on the suspension. HMIC found that further updates were limited and did not provide details of any outcomes.

## Recommendation

**With immediate effect, the force should publish to all staff the outcomes of misconduct hearings. This should include sufficient circumstances of the conduct to allow staff to understand the boundaries of unprofessional behaviour and the sanctions it is likely to attract.**

The force has adopted a scenario-based approach in the delivery of integrity and professional standards training. This has been welcomed by those that have been to the training and provides a safe and constructive environment to test and reinforce standards. We found the City of London Police intend to include the Code of Ethics in all future leadership and specialist training.

The Independent Police Complaints Commission (IPCC) oversees the police complaints system in England and Wales and sets the standards by which the police should handle complaints. HMIC found that the force did a lot to learn and develop from IPCC publications. The PSD circulates IPCC bulletins to officers through the departmental single points of contact. We found a good level of knowledge of the contents of the bulletins during focus groups. The PSDWG have a standing agenda item of 'IPCC guidance and Learning the

Lessons publications' which show the governance arrangements are also promoting learning from the IPCC.

## Professional standards training and resourcing

All staff within the PSD and the CCU attend regular training for their role and bring a variety of relevant operational skills from different areas of policing. Officers within the CCU have all completed the College of Policing (CoP) bronze course in counter-corruption, while all police inspectors and above have attended the CoP silver counter-corruption course. Skills within the CCU have been bolstered by surveillance-trained officers transferring into the unit from covert operations. All investigators receive the PSD investigators course, initial criminal investigation development programme (ICIDP) and training for deaths in custody.

HMIC found that recent staff abstractions from the CCU have left the unit with reduced capacity and capability, (a detective sergeant on secondment to another unit and a detective constable who has moved into the PSD). The CCU also has to share an analyst and a researcher with the PSD.

The PSD is sufficiently resourced and qualified to enable a reactive capability for the identified risks but there is limited evidence that the force is identifying future areas of concern. Where intelligence requires proactive work, the force responds and uses skills and experience from within the force, or calls upon external specialist and covert assets. The PSD and the CCU share an analyst who is primarily employed to support proactive investigations or analytical work to identify potential areas of risk. However we found support given by the analyst to the force governance boards in the provision of management information was limiting the ability to effectively support the PSD and CCU.

Misconduct hearings in the City of London Police are conducted to ensure effectiveness, efficiency and legitimacy, including the use of an appropriately qualified presiding officer who is independent of the person investigated. The force makes use of fast-track dismissals where appropriate. However in the 18 months prior to our inspection, the circumstances whereby fast-track dismissal would have been appropriate have not arisen.

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## Quality assurance

Minutes of the PSDWG (01/07/14) showed that finalised misconduct investigations were reviewed. However is not a standing agenda item, and there is no process in place to trigger a review of hearing decisions as normal business.

There is a clear process to record any learning and circulate it to the force effectively. The force has a governance structure in place supporting the recording and circulation of organisational learning. The force uses the organisational learning forum as the central point for processing organisational learning and lessons learned following misconduct proceedings, are reviewed and sent to this forum. The assistant commissioner reviews all suspensions and restrictions, conducting an overview of all cases during a fortnightly meeting with the head of the PSD.

HMIC is not aware of a specific policy on suspension, resignation and retirement during investigations. However the assistant commissioner retains management of all suspensions and restrictions through the fortnightly review. 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 timeliness, supervision and appropriateness of decision-making.

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

### Investigating corruption

The force identifies and manages threat, risk and harm from corruption as part of a governance structure which includes the assessment of risk, proactive action to mitigate risk and monitoring procedures in which actions are tracked and owners held to account for their actions. The CCU has adopted a national intelligence model (NIM) approach for the identification and management of risk. Outside of the PSD, there is continued identification of threat, risk and harm by the integrity standards board through its use of the integrity checklist. This includes a comprehensive set of force measures such as: grievances; integrity based employment tribunals; complaints; civil cases; force mobile telephones; corporate credit card transactions; use of force forms; expense claims; business interests analysed (police); business interests analysed (support staff); media contacts; information security; gifts and hospitality; and vetting refusals. The integrity standards board refers any relevant information to the PSD as early indicators of areas to review and investigate. However as noted earlier, the current focus of the analyst in the CCU to provide management information, may preclude any in-depth analysis on the information referred.

The force has made progress in developing a process for the regular and proactive identification of staff or groups of staff vulnerable to corruption. The integrity checklist referred to above is part of this process.

Vetting arrangements for all staff comply with the national vetting policy and identify corruption risks at the recruitment stage for officers and staff. Vetting within the force is supported by a force vetting SOP, confirming designated posts and roles together with the procedure for force vetting reviews and appeals.

The force monitors its systems; however it conducts limited monitoring of social networking sites. It enforces stringent information management processes preventing access to all social networking sites on force systems. The CCU does not carry out any proactive monitoring of social networking sites, but conducts monitoring if intelligence triggers the need for further action. The force is in the process of implementing software in the CCU to support proactive investigation and this is to be completed by the end of 2014.

The force uses random and intelligence-led drug testing, but not intelligence-led integrity testing, to identify corruption. Drug testing is carried out on new recruits and the force carries out ten random drug tests per month. The CCU can conduct drug tests if intelligence indicates such action is necessary. The force internally publishes the results of drug testing and HMIC found that staff expressed no concerns over the approach taken.

The force takes all reasonable steps to ensure that organised crime investigations are not compromised and takes further steps to reduce the risk of compromise when preparing for scheduled operations. Evidence provided to HMIC highlighted very clear processes within the vetting department to ensure force representatives deployed on national policing operations were subject to rigorous vetting and misconduct checks.

The force has processes in place to ensure the effective security of systems, exhibits and case papers. The force has a 'removable devices and media' SOP setting out clear requirements and authorisation levels to ensure the effective management of information security. The SOP is linked to stringent force information management processes, which HMIC found to be in place and in use across the force. There is a centralised secure site for the storage of exhibits, case papers and information.

## Intelligence

The force regularly gathers intelligence that can be worked on to consider starting an investigation on corruption, and considers then grades it in compliance with the relevant Authorised Professional Practice (APP) using the national intelligence grading system.

The CCU has a daily management meeting and a fortnightly tasking and co-ordinating meeting. At these meetings corruption issues are considered and recorded, actions raised, reviewed and action holders held to account. A detective sergeant in the CCU is specifically responsible for monitoring intelligence and raising actions. The force has a counter-corruption control strategy that addresses the identification and management of threats from corruption. Intelligence gathered or received by the force is analysed, graded and developed before action takes place in compliance with the relevant APP using the national intelligence grading system.

The force was unable to provide evidence of its effectiveness in the identification of multiple suspects and multiple offences by a single suspect. There is currently limited capacity with the CCU for analysis and proactive work therefore this may be an unexplored area for the force.

There are currently insufficient resources within the CCU to manage the flow of intelligence effectively or efficiently, despite allocating the assessment of intelligence to a detective sergeant in the CCU. This report has already made reference to the current level of resources within the CCU, along with the force's own admission that it is predominantly a reactive department, carrying out no proactive investigation unless triggered by intelligence. The force has acknowledged that the CCU is undergoing a modernisation programme. However the CCU analyst currently remains engaged in the preparation of management data rather than carrying out analysis.

## 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.**

### Capability

The PSD and the CCU have ready access to specialist assets when required. The CCU has the capability to provide surveillance, handling confidential intelligence, technical support and major incident management specialists. Other specialisms: such as undercover officers, dedicated surveillance and crime scene investigation are available within the force or can be accessed through regional and national agreements. Practitioners are confident that the PSD and the CCU had ready access to specialist assets outside the unit and force where necessary.

As set out above, the CCU has insufficient capability and capacity to provide a proactive element. The force has acknowledged that any proactivity in the CCU had been intelligence led and current resources levels restricted any proactive functions. Staff within the CCU stated that they wished to carry out more proactive work; however this is not translated into activity. It is hoped that the modernisation programme within CCU will provide both reactive and proactive elements.

The performance of the PSD and CCU is regularly monitored by the assistant commissioner and includes the timeliness and quality of handling complaints, investigations, decision making, outcomes and appeals. There is a clear governance structure in place in the force with monitoring through the professional standards department working group (PSDWG) and the organisational learning forum (OLF), chaired by the assistant commissioner. In addition to force monitoring, the professional standards police committee sub-group (PSPCSG) conduct quarterly reviews on all complaints made and outcomes.

The head of corruption has a clear and direct reporting line to the assistant commissioner and this is facilitated through bi-weekly meetings.

The force ensures that lessons are learned and effectively disseminated to staff. This report has already touched upon the strong governance structure in place to support the dissemination of both IPCC and organisational lessons.

Cases are appropriately referred to the IPCC in accordance with the statutory guidance.



# Recommendations

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- **Within six months, the force should communicate to all staff, informing them with which professional code they need to comply and any circumstances where another code of profession takes precedence.**
- **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.**
- **With immediate effect, the force should publish to all staff the outcomes of misconduct hearings. This should include sufficient circumstances of the conduct to allow staff to understand the boundaries of unprofessional behaviour and the sanctions it is likely to attract.**
- **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.**