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# Police Integrity and Corruption

Cleveland Police

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

The chief constable and chief officer team exhibit strong and clear leadership, promoting high standards of ethical and professional behaviour. The force generally has good systems and policies about integrity, and has plans to further improve its monitoring procedures through its internal ethics committee. The force is considering collaboration with another force to increase its professional standards department capacity. The force has made considerable efforts to identify threats and vulnerabilities within the force through the people intelligence board and ethics committee.

### Summary

The chief constable and chief officer team have promoted high standards of ethical and professional behaviour. Staff are aware of the boundaries of professional behaviour and understand how poor behaviour can affect both the public and their colleagues. The force is considering collaboration with another force to improve its capacity and capability in professional standards.

The force has developed a people intelligence board (PIB) that brings together senior staff from across the force to examine workforce data relating to professional standards issues. Staff associations are also represented. The chief officer team had commissioned academic research to understand historical issues of integrity within the force.

The force has good processes in place to minimise the risk from investigations being compromised. It is currently re-vetting all staff, a process which has already shown some benefits by having identified certain vulnerable groups, and others who have not complied with force policies.

The force has an anti-corruption unit (ACU) which has well-established arrangements in place for additional specialist support for corruption investigations. The unit collects intelligence from a range of sources although it could be more proactive in this task.

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

There were three areas for improvement from HMIC's 2012 report.

Good progress has been made in these areas.

The force delivers a specific training package on integrity to new recruits and officers on promotion. The chief constable and deputy chief constable deliver clear messages on integrity via personal meetings with staff and via force systems, in addition to the PIB and ethics committee.

**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?**

There has been clear leadership from the chief officer team in setting proper standards of behaviour.

These standards are understood by staff, but a legacy exists within the force following previous high profile investigations involving previous chief officers.

The force has commissioned independent research to better understand this issue.

The force is developing plans to incorporate the Code of Ethics.

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

The force has structures in place to ensure that staff are treated fairly throughout any investigation.

The force has confidential reporting systems.

The force needs processes to ensure lessons about misconduct and integrity are learned.

The force needs to improve its audits process of investigations and has plans to do this.

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

The force has developed a strategic intelligence assessment dealing with potential threats to the force but it needs to improve the systems it has in place to gather effective intelligence about corruption.

All staff are being re-vetted and this process has assisted in identifying certain staff who have failed to report some associations they have, as well as others who are vulnerable because of high levels of debt.

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

**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 adopted national guidance into integrity policies.

**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 minimises and controls the risk of investigations into organised crime groups becoming compromised, and carried out substance misuse testing.

The ACU reacts to information but has limited capability to proactively search and develop intelligence.

# The force/constabulary in numbers



## Complaints

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

**425**

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

**23.7**

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

**54**

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

**3.0**

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

**2.6**



## Business interests

Applications in 12 months to March 2014

**71**

Approvals in 12 months to March 2014

**67**



## Resources

Proportion of workforce in PSD/ACU

**1.3%**

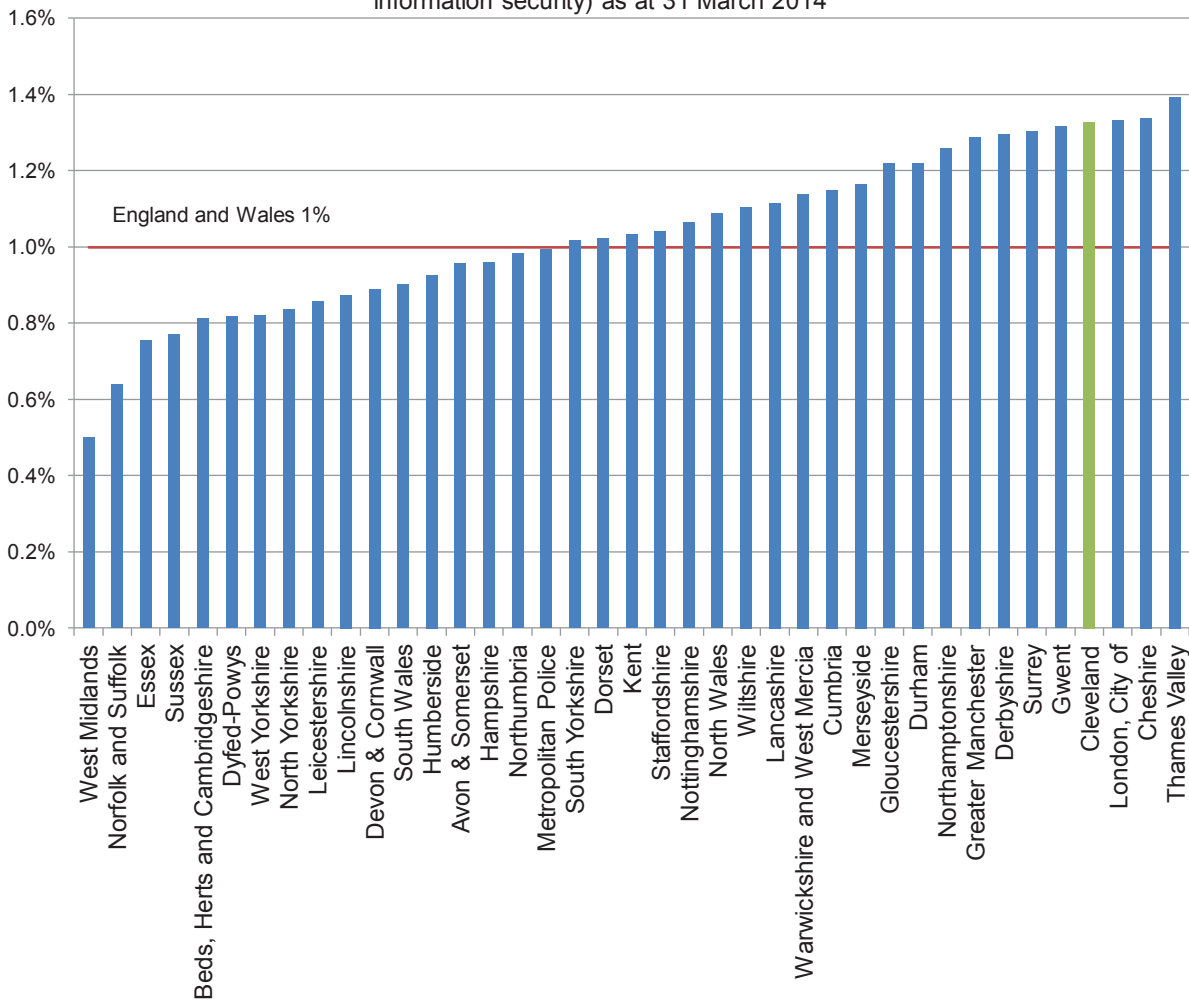
Proportion of workforce in PSD/ACU  
– England and Wales

**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.



Proportion of total workforce in PSD/ACU (including civil/legal litigation, vetting and information security) as at 31 March 2014



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?

HMIC highlighted three areas of improvement for Cleveland Police from the 2012 inspection:

- (1) to monitor and cross-reference the contract and procurement register with the gifts and hospitality register;
- (2) to implement a policy for the use of social networking sites; and
- (3) to train staff in integrity-related matters.

HMIC found that good progress had been made in these areas.

Integrity-related policies have been updated and adopt national guidance. These policies have been communicated to staff. The professional standards department (PSD) manages the gifts and hospitality register and any offers of gifts or hospitality made to chief and senior officers are discussed at the force ethics committee and reported to the joint audit committee for secondary employment or business interests (SEBI).

The head of procurement approves contracts valued up to £150,000 but for contracts with a higher value, authorisation is required from the police and crime commissioner (PCC).

The force has an agreement with Durham Constabulary for the peer audit of the gifts and hospitality register. It was not, however, evident that this register is cross-referred to the procurement register on a regular basis.

During the inspection, HMIC found that staff understood the guidance relating to social networking sites. Commercial software is used to monitor the use of official social networking sites. Staff within the anti-corruption unit (ACU) recently compiled a list of potentially vulnerable staff based upon an assessment of their social network profiles as vulnerable. Each of these individuals was emailed about their vulnerability with recommendations to improve the personal security of their accounts.

The force provides ethics training to new recruits and to those going through the promotion process, as well as to members of staff undertaking the initial crime investigators development programme training, and detective sergeant training programmes. It uses ethical dilemmas as a basis for training and also covers the topic of unconscious bias. The chief constable and deputy chief constable have delivered clear messages on integrity via personal meetings with staff and via force systems, in addition to the PIB and ethics committee. During our reality testing, HMIC found that staff were fully aware of the messages that had been communicated to them either through the personal visits or through messages.

# 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

HMIC found clear evidence of strong leadership from the chief constable and the chief officer team, setting high standards of professional behaviour and making good use of blogs, briefing information and visits to local police stations to meet officers and staff and to convey their messages. The chief constable of the force is the national lead for standards and ethics. Members of staff are aware of the boundaries of professional behaviour and they understand how poor behaviour can affect both the public and their own colleagues.

The force is developing plans to introduce the Code of Ethics into the force. An event was arranged in May 2014, together with the College of Policing, to explore the best means of doing this. The chief constable chairs the transparency, integrity, values and ethics (TIVE) board and has commissioned work to map the nine principles of the code against the existing forces values. The deputy chief constable monitors integrity issues through weekly meetings with the head of PSD and the head of human resources (HR).

Written policies and guidance clearly explain the meaning of misconduct, and cover expectations of staff both in relation to their private as well as their professional lives. They cover such areas as whether to accept offers of gifts and hospitality; the use of corporate credit cards; social media; force computer systems; and notifiable associations. The force has a code of conduct for police staff. The policies are up to date and are reviewed either annually or every two years, depending on the risk associated with the policy.

There is a clear policy outlining the obligation to declare any changes in circumstances regarding personal associations and relationships. The policy also clearly outlines the procedure for reviewing and acting on any notifications made. The force circulates the requirements of the policy through emails to all staff, but HMIC found that some members of staff nonetheless remained unaware of their obligations.

The National Decision Model (NDM) is in use at all levels in the force and staff have been trained and understand its application. National decision model training forms part of annual personal safety and leadership training delivered to staff and it is included in other courses. HMIC found that staff use it as part of their daily decision-making process and had received aide memoire cards to assist them.

Chief officers provide sufficient information to the PCC to enable effective governance and accountability on integrity issues at weekly meetings with the chief constable where issues of concern are discussed. The PCC is represented on the TIVE board and there is daily dialogue between the deputy chief constable and the chief of staff from the office of the PCC (OPCC) also dip-sampling PSD case files as part of their scrutiny process.

## Understanding integrity

The force has commissioned work to understand how integrity issues affect public trust. In particular, Teeside University have been asked to help assess the effect the chief officer corruption cases might have had on public confidence. The force was awaiting the result of this at the time of the inspection.

The force has undertaken two staff surveys in the last 18 months (leadership survey and stress audit) to understand staff perceptions of integrity within the force. The results of these surveys have been provided to the TIVE board to progress.

The force has developed a people intelligence board (PIB) that brings together senior staff from across the organisation and includes staff associations. The board examines a range of data including misconduct and complaints, grievances, sickness and other integrity data such as registers. This allows the group to identify integrity-related issues at an individual level and also trends that occur across the organisation.

The PSD holds the central register recording applications by staff for secondary employment or business interests (SEBI); this is supported with a clear policy and procedures.

All applications for SEBI are reviewed by the deputy chief constable at least annually. On occasions where applications are refused, the force follows up when information suggests that staff are undertaking the work regardless. The force publishes a list of SEBI but this was not up to date. The register lists the authorised occupations or activities for all ranks of police officers and police staff grades.

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

## Misconduct and unprofessional behaviour

Misconduct or unprofessional behaviour are considered as part of the force's decision-making process relating to promotions applications for transfers to specialist roles. The promotion process specifically considered vetting, and any complaints or discipline issues recorded against applicants. Applicants for the senior police national assessment centre, a pre-cursor for attendance on the senior command course for potential chief officers, and the fast-track development scheme are vetted to a high level.

The force ensures that all staff, irrespective of rank or role, are treated fairly and equally during misconduct investigations. Chairs of misconduct hearings are provided with written guidance to assist them through the process, and are supported by an independent legal advisor. Reciprocal arrangements exist with a neighbouring force to provide an appropriately qualified presiding officer, for each hearing, who is independent of the investigation.

Cleveland Police responds to reports of wrongdoing by staff in an effective manner. It has confidential mechanisms by which wrongdoing can be reported, and this is supported by a clear policy. Some staff voiced concerns about the lack of independence, in that the existing mechanism is linked to the force's IT system. The force plans to add the use of Crimestoppers to provide staff with an additional source of anonymous confidential reporting.

HMIC are satisfied, having dip-sampled a number of files during the inspection, that cases are appropriately being referred to the IPCC.

The force uses the IPCC bulletin to disseminate learning. The PSD circulates a monthly internal report through the force intranet dealing with lessons that can be learned from investigations, including outcomes from IPCC investigations as well as from misconduct hearings. These reports include a range of information. There was, however, no clear process which captured, recorded and monitored any learning for the organisation. There was a reliance on the use of emails to all staff to communicate, whereby important messages might be missed.

## Recommendation

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

## Professional standards training and resourcing

The PSD and ACU is predominately staffed by police officers who are fully accredited detectives. In addition to this they have been provided with additional training for the role, however, the force does not offer bespoke professional standards or anti-corruption courses. The force is currently looking at placing staff on the nationally accredited bronze and silver anti-corruption courses; however, at the time of this inspection no staff had attended these.

The department currently has two police staff investigator roles, however, only one of these positions was filled at the time of inspection. The force has a plan to use agency staff to work alongside qualified police officers and assist with local resolutions but the force has limited capacity to be proactive in identifying corruption within the force.

Succession planning takes place to ensure consistency and currency in skills and experience within PSD and the ACU. Future vacancies are expected, and three-monthly attachments have been introduced to identify suitable and interested candidates.

The force makes use of fast-track proceedings to deal with appropriate misconduct matters, where appropriate.

## Quality assurance

There is a weekly process between the deputy chief constable, the head of PSD and HR where the decisions on misconduct and investigations are reviewed and scrutinised. The deputy chief constable also provides the level of intervention to ensure they are justifiable, proportionate, and can be escalated or de-escalated appropriately. There are future proposals to take some cases to the ethics committee to provide a wider level of review and scrutiny. HMIC dip-sampled a small number of case files as part of the inspection and found that there is clear methodology regarding the assessment of the complaint or misconduct issue, with an initial assessment being carried out by the office manager. A progress log is kept and there are reviews from supervisors regarding the cases.

The PSD oversees police staff investigations along with the HR department. If the investigation involves a criminal allegation this is managed by PSD; if it does not then the head of HR assigns a suitably trained investigator and provides regular updates to PSD. The force uses private contractors extensively to provide a number of back office and support functions. There is a memorandum of understanding that has agreed how allegations of misconduct are dealt with when they involve these contracted staff.

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

### Investigating corruption

The ACU uses the National Crime Agency (NCA) counter-corruption threat assessment to develop a strategic assessment of potential harm and risk within the force. In addition, the force uses the newly formed PIB to proactively identify vulnerable staff or groups. The force acknowledges that some groups and staff are – by nature – more vulnerable to corruption and misconduct and has done some work to identify those who may potentially cause a risk to the public. The iBase intelligence system is used to collate the intelligence within the ACU.

The force is in the process of re-vetting all police officers and police staff. As a result of this process some notifiable associations have been identified that should have been reported by staff, and staff with financial difficulties have also been identified. Vetting forms part of the recruitment process for new staff and management vetting is carried out for those who have access to sensitive information. Contracted workers with the force are vetted every three years. The force uses a standalone system for its vetting process (IVET), specifically designed for Cleveland Police.

The force uses random and with cause substance testing, and intelligence-led integrity testing to assist in identifying corruption. This includes testing of contracted staff undertaken on behalf of the force by North Yorkshire Police. HMIC found no evidence that the outcomes of these tests are circulated to the workforce although the force does have plans in place to do this in due course through its PSD newsletter.

The force takes effective steps to ensure that its organised crime investigations are not compromised. The organised crime unit (OCU) liaises with the ACU which then undertakes investigation audits of systems to minimise risks. The force also has arrangements in place to use resources from neighbouring forces when any potential risk of compromise is identified. Vetting processes and intrusive supervisory oversight is also used where appropriate to prevent organised crime investigations from being compromised.

The force ensures the effective security of systems, exhibits and case papers. There are tight controls in place, outlined in the new media policy, and passwords are secure. Encrypted devices are used to move data when required, and the use of privately owned storage devices is not permitted. Staff awareness relating to threats to security has been delivered and the force has a clear desk policy.



## Intelligence

The force holds a PSD tasking and co-ordinating meeting for misconduct and corruption investigations. This meeting reviews and prioritises intelligence according to the severity and threat it pose and commissions investigations in response. The progress of investigations is monitored at weekly meetings along with any new intelligence received. Investigations are also scrutinised by the deputy chief constable. In addition to this, the PIB considers a range of management information.

The ACU gathers intelligence from a range of sources and records and prioritises this appropriately. The force acknowledges that it could be more proactive in this area and is looking at how it can best be achieved.

## Capability

The force has access to staff with specialist skills when these are required. Some are available within the force but additional resources are available through good established relationships and formal agreements with neighbouring forces. The force is also able to request additional resources from the NCA when required.

The ACU responds efficiently to any information or intelligence it receives, but does not have the capacity to undertake substantial proactive work to identify and develop intelligence for misconduct investigation or to enable other specialist resources to progress cases. The force acknowledges this and is looking to collaborate with North Yorkshire Police to provide additional resources and resilience in this area.

## 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.**

## Recommendations

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- **Within six months, the force should ensure it has an effective process 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.**