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# Police Integrity and Corruption

Dorset Constabulary

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

The force has made some progress in managing professional and personal relationships since HMIC revisit inspection in 2012 and has continued to publicise and embed ethical and professional behaviour. Chief officer leadership is clear and there is a climate of professionalism, where wrongdoing is challenged. The risk of corruption and challenges to professional conduct are identified, but work is required to develop the professional standards department's (PSD's) policies and to improve the active monitoring of vulnerability to corruption

### Summary

HMIC found evidence of clear leadership and a commitment to ensuring the highest standards of ethical behaviour and professional conduct from the chief officer team. Staff generally understand their responsibilities in delivering services professionally and making ethical decisions. The chief constable championed Dorset Police's adoption of the Code of Ethics in a series of chief officer roadshows to the workforce. The force has plans to further communicate and embed the Code of Ethics.

The force takes steps to identify staff vulnerable to corruption using intelligence from different sources. There is effective analysis to understand the threat of corruption but proactive monitoring of staff compliance with professional standards is limited.

Reports of staff wrongdoing are dealt with in an effective and timely manner, and misconduct hearings managed effectively. However, the PSD policies and governance need improvement.

There is an effective process to learn lessons from experience and to disseminate the learning to the workforce. The force monitors its information systems, but not social networking sites. It publishes the gifts and hospitality offered to its staff but the register is not up to date and not easily found on its website. Call data from force telephones are regularly audited.

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

HMIC found no progress had been made in cross-referencing the procurement process with the gifts and hospitality register to ensure the integrity of the procurement process, identified as an area for improvement in the HMIC 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 chief constable and her team are committed to providing strong leadership in relation to integrity and corruption issues.

Plans to ensure that the Code of Ethics is understood by staff are being led by a chief inspector.

Policy and procedure in relation to gifts and hospitality, business interests and notifiable associations are clear. However, some staff are unsure about which personal associations need to be notified or which gifts need to be declared.

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

There is an effective assessment of risk to the force from corruption.

Officers and staff within the force are confident about challenging and reporting wrongdoing by colleagues, but less confident about reporting senior officers.

There is regular audit of credit card spending although this is not cross-referenced against diary appointments.

The force has a checking mechanism to ensure that, if an application for a business interest is refused, that refusal is complied with.

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

The force takes positive steps to identify groups of staff who are vulnerable to corruption.

The anti-corruption unit (ACU) uses a number of sources of information to develop a threat assessment that is shared with the chief constable and the PCC.

The proactivity of the anti-corruption unit is restricted by its size, but it is able to use external resources when needed.

**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 chief constable and the police and crime commissioner (PCC) work closely together and jointly chair an ethics board.

Policy regulation governing the operation of the professional standards department (PSD) is lacking and there is no succession planning to replace members of staff who leave the department.

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

Investigations are conducted in a prompt and efficient manner.

**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

**391**

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

**17.4**

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

**15.7**



## Conduct

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

**47**

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

**2.1**

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

**2.6**



## Business interests

Applications in 12 months  
to March 2014

**41**

Approvals in 12 months  
to March 2014

**40**



## Resources

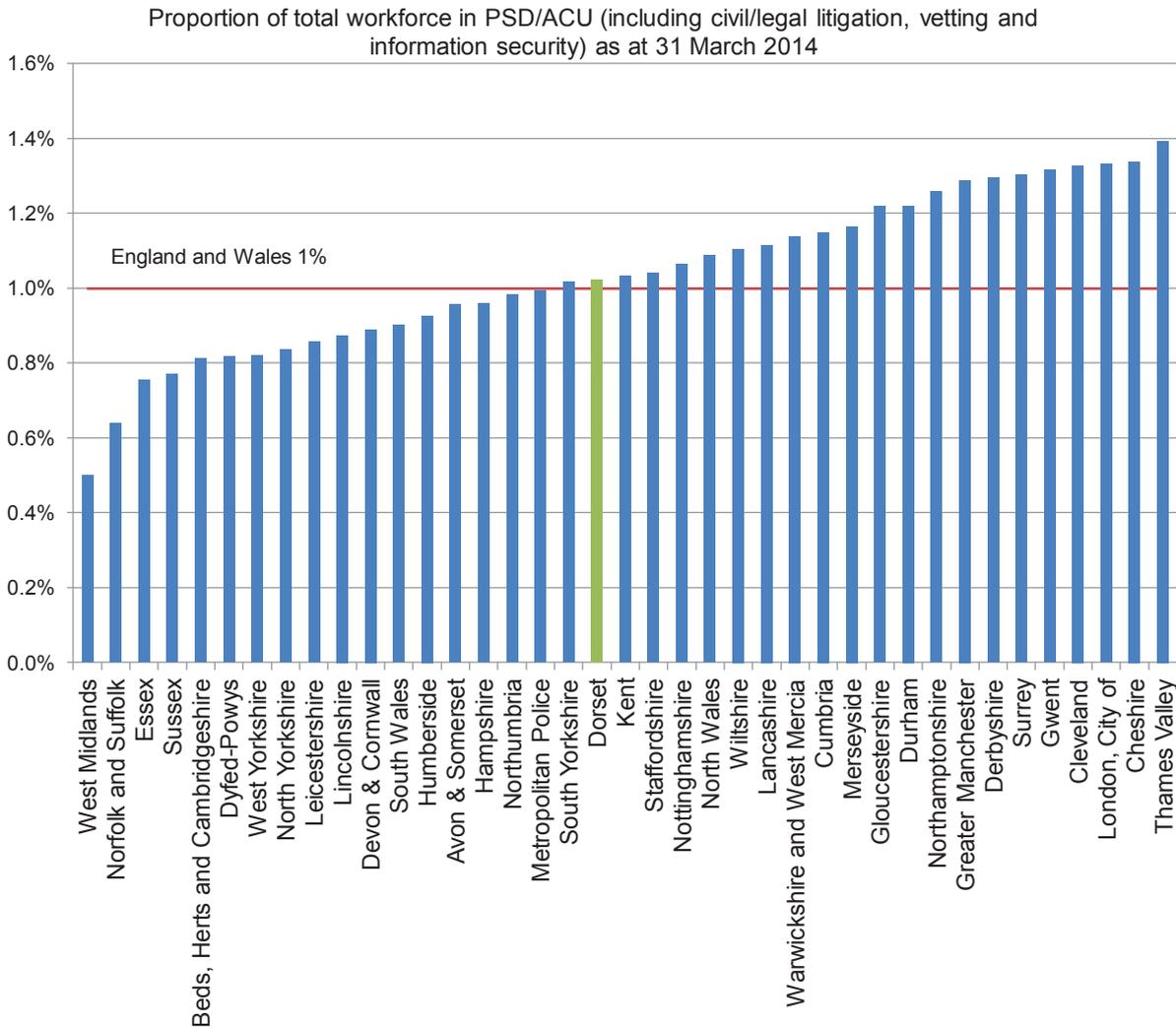
Proportion of workforce in  
PSD/ACU

**1.0%**

Proportion of workforce in  
PSD/ACU  
– England and Wales

**1.0%**

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



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

## Introduction

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

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

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

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

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

A national report on police integrity and corruption will be available at [www.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 2012 HMIC inspection of Dorset Police, we identified that there was no cross-checking between the contracts and procurement register and the gifts and hospitality register, and that there should be.

The inspection in 2014 found that there was still no cross-checking between these two registers to ensure the integrity of the procurement process. There has therefore been no progress in this area.

## Recommendation

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

# 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 was evidence of clear and positive leadership from the chief constable in promoting ethical and professional behaviour. The chief constable has undertaken a series of roadshow events that every member of staff is invited to attend. These roadshows involve small groups of staff and cover, among other issues, adopting the College of Policing's Code of Ethics. The roadshows are well received and, through examples, emphasise the importance of ethical behaviour in delivering a service to the public. The force's long-standing values of 'integrity, professionalism, fairness and respect' appear on all its publications and are well known by staff; they also reflect the principles of the College of Policing's Code of Ethics.

During focus group interviews and unannounced visits, HMIC found evidence that officers and staff are generally aware of the boundaries of professional behaviour and understand how professional behaviour affects both the public and their colleagues. Nevertheless, the force recognises that correct standards are not always met, and this has been highlighted by entries in the force-wide 'General orders' publication and cases reported in the 'Hindsight' newsletter.

HMIC found a consistent perception among officers and staff that all leaders, including first-line supervisors, lead by example and challenge inappropriate behaviour. There is, however, also a perception that the frequent use of 'acting' supervisors leads to poorer quality supervision, and that standards are less well enforced as a result. HMIC found staff have confidence in the commitment of the divisional managers to promote good standards of ethical and professional behaviour, and act accordingly.

The force has plans in place to communicate the Code of Ethics and ensure that it is adopted. A chief inspector has been appointed as the force lead for this programme. All departmental heads are required to identify a lead person to ensure that internal plans also reflect the Code. The force already promotes values – namely, integrity, professionalism, fairness and respect – that reflect the principles within the Code of Ethics, and there was evidence that these values have been publicised across the force.

HMIC found evidence that staff are aware of their responsibility to challenge and report misconduct and unprofessional behaviour. Most staff believe support would be available when the challenge is directed at a peer or colleague at a similar level in the organisation. However, for some staff, this confidence did not extend to challenging senior officers because the force is small and anonymity is not guaranteed.

The force has clear policies on the receipt of gifts and hospitality, and declaration of business interests and notifiable associations. However, HMIC found that, although most members of staff are aware of force policies, some are uncertain which types of personal associations should be notified to the force and which gifts should be declared.

HMIC found the National Decision Model (NDM) is understood and commonly applied by officers at all levels in the force. The NDM is incorporated in training and included as a topic in all leadership workshops. The model and its application are reinforced by videos, posters and there is an aide memoire note for officers to refer to while on patrol.

Training on ethical and professional behaviour is given to staff at the beginning of their employment with Dorset Police. All new staff receive training on the Code of Ethics and are met by a member of the command team who emphasises the importance of professional conduct. Mid-service officers and staff who have not received the training have been provided with a College of Policing 'e-learning' package, which was described as 'poor and uninteresting' by some members of staff we spoke to.

The anti-corruption unit (ACU) has developed a further e-learning package that covers the Code of Ethics, theft, data protection and the 'notifiable association' policy. There are plans to use it to train sergeants and supervisors.

Leadership by chief officers on integrity issues, including misconduct and unprofessional behaviour, is clear, visible and recognised by staff. Chief officers deliver clear messages encouraging positive behaviour; explaining boundaries of acceptable conduct; and encouraging the reporting of wrongdoing. The force has produced a DVD and a public relations campaign is ongoing. The force has also produced a 'story book' that highlights instances of exemplary professional behaviour by officers and staff.

There was evidence of commitment to ethical behaviour and standards. The chief constable consistently emphasises the importance of 'knowing yourself, knowing your staff, knowing your business'. This message has been communicated well, but the extent to which the force has tested the effect or application of these principles is less clear. However the 360 degree feedback process is undertaken across all supervision and tests the leadership standards.

The chief constable and the police and crime commissioner (PCC) jointly chair the standards and ethics board that provides governance and accountability on integrity issues including misconduct and unprofessional behaviour. There is also an independent ethics and appeals sub-committee. HMIC was given minutes of meetings of both the board and the sub-committee, which showed information was provided to the PCC for his use in holding the force to account. The independent ethics and appeals sub-committee has three members and specialist advice is available to assist decision making. The sub-committee's terms of reference include regular examination of a sample of complaint investigation files.

The standards and ethics board includes representatives from staff associations and all relevant departments affected by or interested in standards and ethical behaviour. During meetings, individuals are held responsible for completing actions allocated to them, and integrity issues are discussed and actively monitored.

HMIC found force policies are reviewed regularly but not all these policies clearly explain misconduct or unprofessional behaviour. This may have contributed to the uncertainty expressed by some staff interviewed during the inspection. It is clear that further guidance is required that provides more effective explanations, in particular with regard to gifts, hospitality and notifiable associations.

## Understanding integrity

The force undertakes a number of surveys but, overall, limited work is carried out to understand how integrity issues, including misconduct and professional behaviour, affect public trust.

The gifts and hospitality register is held by the professional standards department (PSD). Occasions when officers and staff are offered gifts or hospitality are recorded, including those occasions on which a gift or offer of hospitality is not accepted.

The use of force credit cards is audited by both the ACU detective inspector and the procurement department. The audits undertaken include the command team credit cards but there is no cross-referencing with chief officers' diaries.

Details of offers of gifts and hospitality and expenses are published on the force website but are not easy to find and the information published is out of date.

We found that most staff are aware of the force business interests' policy, which requires individual staff to seek approval before they enter into a business interest. Details of business interests are held on a database and monitored by the PSD. When an application is not approved, a system has been developed that triggers a review after six months to ensure that the applicant has not engaged in the activity regardless.

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

## Misconduct and unprofessional behaviour

HMIC found that misconduct and unprofessional behaviour are considered as factors when decisions are made to transfer officers and staff to specialist roles or to promote them.

There is a close and effective working relationship between the command team and senior leaders within the professional standards department (PSD). The complaints and misconduct section of the PSD is led by two police staff in a job-share arrangement. They jointly undertake the function of 'appropriate authority' as required under Police Conduct Regulations 2012. It is their role to ensure that the force treats all staff fairly and equally when recording complaints, making assessments of severity, investigating possible misconduct and imposing sanctions.

The PSD meets regularly with human resource (HR) representatives and investigates all criminal matters. If a member of police staff is involved, the investigation is conducted by HR rather than the PSD.

We conducted a review of 20 PSD cases. This included reviewing randomly selected cases involving serious misconduct or criminal conduct. The aim was to check on timeliness, supervision and appropriateness of decision making. Overall, the decision making was good but there were inconsistencies in the completion of severity assessments and investigation plans.

There are no established policies guiding areas of procedure within the PSD, and the inspection found that the PSD instead relies on the experience and competence of the staff currently in post. HMIC found this omission had already been noted by the independent ethics and appeals sub-committee in 2013. The development of effective standard operating procedures within the PSD would improve efficiency when processes are audited.

The force has a confidential email facility by which staff can report wrongdoing. This is well advertised throughout the force and all interviewees knew of its existence. It was felt by some, however, that the small size of the force is a barrier to reporting because of the potential for inadvertent leaks within a close-knit workforce.

Nevertheless, an example was provided of information received through a confidential reporting telephone line that resulted in a high-profile investigation and criminal conviction, as well as changes to internal processes. There was evidence that most staff feel confident enough to report misconduct and unprofessional behaviour by individuals or groups, but even though external support is available, some remain concerned about the consequences. Staff are less confident to report the inappropriate behaviour of senior managers because they believe they would be less well supported.

The force responds to reports of wrongdoing by staff in an effective and timely manner. It also publishes data and information in relation to gifts and hospitality offered to all officers and staff (including those offers that are accepted and those that are rejected). The published data is, however, out of date and difficult to find.

The use of credit cards issued by the force is closely scrutinised. There are a total of 20 credit cards issued to staff and all are subject to regular audit. The expenses of chief officers are published on the force website, but the information is similarly difficult to find and largely out of date.

Nevertheless, there is a consistent theme throughout the inspection that officers and staff know of their obligations to challenge misconduct and unprofessional behaviour, and are aware of the mechanisms to report wrongdoing.

HMIC found that cases are appropriately referred to the Independent Police Complaints Commission (IPCC) and are also discussed at the standards and ethics board when necessary. The IPCC's 'lessons learned' bulletin is disseminated and presented to the standards and ethics board. The bulletins are included in the force-wide 'General orders' publication and the 'Hindsight' newsletter, and the training department liaises closely with the PSD. The force has also employed an individual on a part-time basis to collate organisational learning and ensure that it is put into action and monitored, with any failures in this respect reported to the command team.

## Professional standards training and resourcing

The PSD is headed by a superintendent. It has a number of areas of responsibility including investigating complaints against the police and conducting misconduct investigations. The PSD incorporates the anti-corruption unit (ACU) and the information management unit.

All ACU members of staff have received appropriate training. At the time of our inspection, a member of staff was due to attend a financial intelligence course but the provision of training for PSD staff is inconsistent. HMIC found no evidence of planned development to ensure consistency in resourcing for the PSD and the ACU so that, when staff leave, suitably qualified and vetted replacements are available. This represents a potential risk to the effectiveness of counter-corruption investigation by the force and needs attention.

The PSD is resourced sufficiently to manage demand and there is some evidence of a capability to carry out preventive investigation or analyses. Resources from other forces are available to the PSD and the ACU when necessary to support large or complex investigations.

The force ensures misconduct hearings are structured, so as to ensure transparency, effectiveness, efficiency and legitimacy, by the use of appropriately qualified presiding officers independent of the person investigated. The small size of the force means that occasionally, if an independent presiding officer cannot be found in Dorset Police, support is provided by a neighbouring force.

Misconduct hearing panels include a lay member and advice and guidance is provided for the presiding officer and the panel. HMIC found evidence that the force makes use of fast-track dismissal of officers and staff when appropriate. HMIC found the command team is committed to ensuring the highest standards of conduct and ethical behaviour from officers and staff. This was highlighted by the fact that the force had recently declined to award long-service medals to two members of staff whose records had fallen short of the professional standards expected by Dorset Police.

## Quality assurance

HMIC found that the force reviews every misconduct hearing and misconduct meeting. However, the reviews do not extend to auditing the justification of investigations or whether they were dealt with at the right level. Although a sample of cases are examined by the independent ethics and appeals sub-committee, HMIC found there is considerable reliance on the skills and experience of the police staff fulfilling the role of appropriate authority.

The force ensures the timeliness and quality of all investigations conducted, in relation to both officers and staff, whether they are carried out by the PSD or another department. The head of the PSD meets monthly with the head of HR to discuss cases that are the responsibility of both departments. All allegations involving police officers are investigated by the PSD apart from those assessed as suitable for local resolution, which are forwarded to managers in the area in which the officer works.

There is a clear and effective process to identify learning and disseminate it to the workforce. The ACU de-briefs every investigation to identify learning and good practice. The force has created a new part-time post to oversee organisational learning from serious case reviews, domestic homicide reviews, HMIC inspections and bulletins from the IPCC. The holder of this post is responsible for collating and checking the progress of actions, and relevant information is published in bulletins or the 'Hindsight' newsletter.

The standards and ethics board co-ordinates actions arising from their work and reports to the joint executive board. The results of misconduct hearings are published both internally and externally.

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HMIC found that there is no policy on suspension, resignation and retirement during investigations for police staff or officers. The force considers this unnecessary because every case is dealt with individually and on its merits. The force allows police staff to resign prior to a hearing under their employment contracts and applies police regulations to officers ensuring that those facing misconduct hearings can only resign within accordance with the regulations.

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

## Investigating corruption

The force identifies and manages threat, risk and harm from corruption through its governance structure, the tasks of which include the assessment of risk, proactive action to mitigate it and monitoring procedures.

The anti-corruption unit (ACU) considers and prioritises national and force threat assessments (for example, in relation to data protection, sexual predatory behaviour and theft). It then develops plans that are presented to the standards and ethics board by the ACU detective inspector.

HMIC found that the force proactively identifies vulnerable staff groups. The ACU has a separate, dedicated and secure intelligence system. Vulnerable members of staff are identified by a number of means, including the 'association declaration policy', whereby all staff are requested to declare their personal associations. These declarations are submitted to the ACU where they are scrutinised to identify staffs' vulnerability to corruption or other risk.

There was also evidence that the ACU is effective in identifying the vulnerabilities of officers and staff who face debt problems, and that it works closely with force vetting and other agencies to support staff identified as a potential risk. The force also operates a standards and vulnerability matrix, compiled by the ACU, which is used to identify individuals or groups of staff susceptible to corruption.

A matrix called 'PRISM' (profiling risk matrix) is used to assist in profiling individuals who pose the highest threat of sexual predatory behaviour to the force. At the time of the inspection, four individuals had been classed as high risk and were under investigation. The ACU has an effective relationship with the professional standards department (PSD) and passes on intelligence packages for development and action.

In some high-level investigations undertaken by the ACU and the PSD, support is provided by the major crime team. External support from the region and the National Crime Agency is also available.

The location of the vetting department is adjacent to the ACU within the PSD and it provides information for both units. Vetting arrangements comply with the national vetting policy and identify corruption risks at the recruitment stage for officers and staff. Checks are revisited when staff are promoted to senior ranks or posted to sensitive roles that may make them vulnerable. The policy was implemented in 2009, reviewed in 2011 and was due for a further review in 2012, but there was no evidence that this has been completed. In 2015, a new vetting code will be produced by the College of Policing, and the force will need to ensure that it is prepared to comply with the conditions of that code.

The force monitors force systems and takes proportionate action when appropriate. There is no monitoring of social networking sites but examples were provided of when staff had seen and reported inappropriate usage of social media, and had been aware of subsequent misconduct investigations. Software is available for forces to purchase and would be a benefit for continuous monitoring.

The ACU has access to call data for all calls made by staff using force mobile phones. Although these requirements are being met, it is recognised by the force that the scope for an additional information audit is significant but currently limited by the numbers of staff available.

The force does not carry out cross-checking of senior or chief officers' diaries against the gifts and hospitality register and expenses claims.

The force uses random and 'with cause' drug testing (in other words, testing when information or intelligence has suggested that it is appropriate) and integrity testing (undertaken on the basis of intelligence) to identify corruption. Results are circulated to the workforce and was corroborated by interviews and data supplied to HMIC by the force.

The force ensures that organised crime investigations are not compromised, but it does not protect other forthcoming operations from corruption in order to reduce the risk that they will be compromised. ACU supervisors attend regular meetings on the progress of serious and organised crime investigations. These meetings provide updates and information about persons of interest so that ACU is able to identify inappropriate links. Police systems are actively monitored to ensure that information about organised crime investigations is secure.

The ACU also takes responsibility for investigations at the request of senior investigating officers when they have concerns about the security of their operations or the vulnerability of team members.

The force ensures the effective security of systems, exhibits and case papers. Policies and procedures exist for information sharing and system security, and these were reviewed in 2013. The system security policy outlines the need to safeguard sensitive information and counter potential threats. The threats are detailed in the document and the relevant countermeasures explained. The ACU uses a secure office with secure file storage and a policy that desks should be kept clear of all papers.

## Intelligence

The force is aware of the need to comply with the authorised professional practice (APP) for counter-corruption although the version being used was still in draft form at the time of the inspection. Some analysis has been carried out to identify trends concerning ethics and misconduct, and the ACU emphasises the value of a current corruption threat assessment, the standards and vulnerability matrix and 'PRISM' in identifying individuals who present a risk of misconduct.

The force proactively and regularly gathers actionable intelligence on corruption and grades it in compliance with the relevant APP. Every quarter, casework data are received from the PSD and analysed for any trends or patterns of behaviour.

Senior leaders are made aware of trends and all intelligence is examined by the ACU analyst and entered on the ACU's dedicated intelligence system. When relevant, the intelligence is entered on the standards and vulnerability matrix or 'PRISM'. Actionable intelligence is allocated to the most appropriate resource and the necessary support is provided. This is monitored through fortnightly ACU co-ordination meetings and any significant issues are presented to the standards and ethics board, which also provides governance.

The ACU analyst effectively identifies multiple suspects and multiple offences by a single suspect. The analyst produces association charts and assesses telecoms data. The numbers of analysts and researchers are considered by the force to be sufficient to deal with the flow of intelligence, and additional resources can be transferred from other departments if required.

## Capability

HMIC found that the PSD and the ACU have access to specialist assets when required. Local, regional and national assets are available to support investigations. Examples were provided to HMIC of support being provided in a complex case that had involved fraud. ACU staff are positive about their role and, although opportunities for proactive investigation are constrained by the size of the unit, the unit appears to operate effectively. The performance of the PSD and the ACU is regularly monitored by the force, which examines the timeliness and quality of complaints handling, investigations, decision making, outcomes and appeals.

The standards and ethics board meetings have minutes taken and actions allocated. A further level of scrutiny is provided by the independent ethics and appeals sub-committee.

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At a tactical level, there is daily supervision of investigations and fortnightly co-ordination of work in progress. The head of the ACU is a detective inspector. He has a direct reporting line to the head of PSD and the deputy chief constable (DCC). The force ensures that lessons are learned and effectively disseminated to officers and staff. Organisational learning is promoted and examples of behaviour standards that have fallen below what is expected are published in the force-wide 'General orders' publication and the 'Hindsight' newsletter. The sample of a number of cases examined by HMIC confirmed that cases are referred to the Independent Police Complaints Commission (IPCC) in accordance with statutory guidance.

# Recommendations

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