



Inspecting policing  
in the public interest

# Police Integrity and Corruption

Dyfed-Powys Police

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

There is clear leadership from the chief constable on the importance of values, ethics and personal behaviour, and good examples of individuals challenging and reporting unethical and unprofessional behaviour by colleagues. The force has an established professional standards department (PSD) including an anti-corruption unit (ACU). These are, however, insufficiently resourced resulting in the force being unable to investigate misconduct and corruption in a timely fashion. The force has made limited progress since the last HMIC inspection.

### Summary

There is clear leadership from the chief constable on the importance of values, ethics and personal behaviour, and good examples of individuals challenging and reporting unethical and unprofessional behaviour by colleagues. The force has an established professional standards department (PSD) including an anti-corruption unit (ACU). These are, however, insufficiently resourced resulting in the force being unable to investigate misconduct and corruption in a timely fashion. The force has made limited progress since the last HMIC inspection.

The chief and deputy chief constables provide strong leadership and have explained the importance of cultural change to the force. 'Doing the right thing' is now a mantra that has been adopted by the whole organisation. The force should do more to ensure staff and officers better understand how they can practically challenge and manage misconduct. The force understands the importance of the new Code of Ethics and there is an enthusiastic view held by senior managers that the new Code of Ethics offers a significant opportunity for the force to reinforce the progress it has already made concerning standards.

The PSD is insufficiently resourced to look for unprofessional behaviour in a proactive fashion and does not carry out timely investigations. Additionally, the anti-corruption capacity and capability is under-resourced. It has limited arrangements in place to prevent major operations being compromised by the threat of corruption and no dedicated and trained analyst and researcher, which in turn inhibits the development of actionable intelligence.

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

Four areas for improvement were identified in HMIC's inspection in 2012.

**1. The force needed to make staff more aware of relevant policies.**

Good progress has been made in this area; staff have a better understanding of relevant policies.

**2. No monitoring system was in place to cross-reference contract and procurement registers with the gifts and hospitality register.**

Limited progress has been made in this area; there is still more cross-referencing required.

**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 is clear leadership from the chief constable supported by other chief officers.

The force ethos of 'do the right thing' showed a positive attitude and is seen as a strength which the force can build upon.

Individuals understand their responsibilities as the force moves from a culture of targets to providing a service with integrity.

Improved policies are in place with a consistent approach to dealing with wrongdoing that are understood by staff.

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

The deputy chief constable has recently commissioned an external review of the PSD.

A remedial action plan is in place which proposes a change of key staff in the PSD and additional resourcing.

There is insufficient staffing to support the current working practices and a backlog of cases needing investigation and closure.

The force has poor governance and performance management of its misconduct cases.

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

The PSD makes use of the national crime agency (NCA) counter-corruption threat assessment to identify threat and risk issues of potential relevance to the force.

Where the force does conduct investigations, cases are correctly managed.

Cases are appropriately referred to the IPCC.

The ACU will react to any intelligence but is not resourced to proactively identify and develop intelligence itself about corruption.

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

**3. The force needed to improve the management of the secondary business interest process.**

Limited progress has been made in this area; rejected applications are not recorded and reviewed.

**4. The force needed to improve its training to staff on integrity issues and ensure messages were understood.**

Limited progress has been made in this area; the force does not check who has received training or if it is understood.

**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 does not carry out enough analysis to understand integrity issues and how it should respond.

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

Officers and staff are not fully aware of behavioural boundaries nor are frontline leaders equipped with all of the necessary skills and confidence to manage misconduct actively.

A clear process for learning lessons from misconduct incidents is in place.

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

The ACU does not have a dedicated, trained analyst or intelligence researcher.

There are limited arrangements to identify corrupt practice associated with serious and organised crime or to safeguard future operations from the risks of corruption.

The force's vetting arrangements are compliant with the national vetting policy. Vetting is revisited on promotion to senior ranks and for posting to sensitive roles.

# The force/constabulary in numbers



## Complaints

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

**319**

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

**17.5**

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

**35**

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

**1.9**

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

**2.6**



## Business interests

Applications in 12 months  
to March 2014

**105**

Approvals in 12 months  
to March 2014

**105**



## Resources

Proportion of workforce in  
PSD/ACU

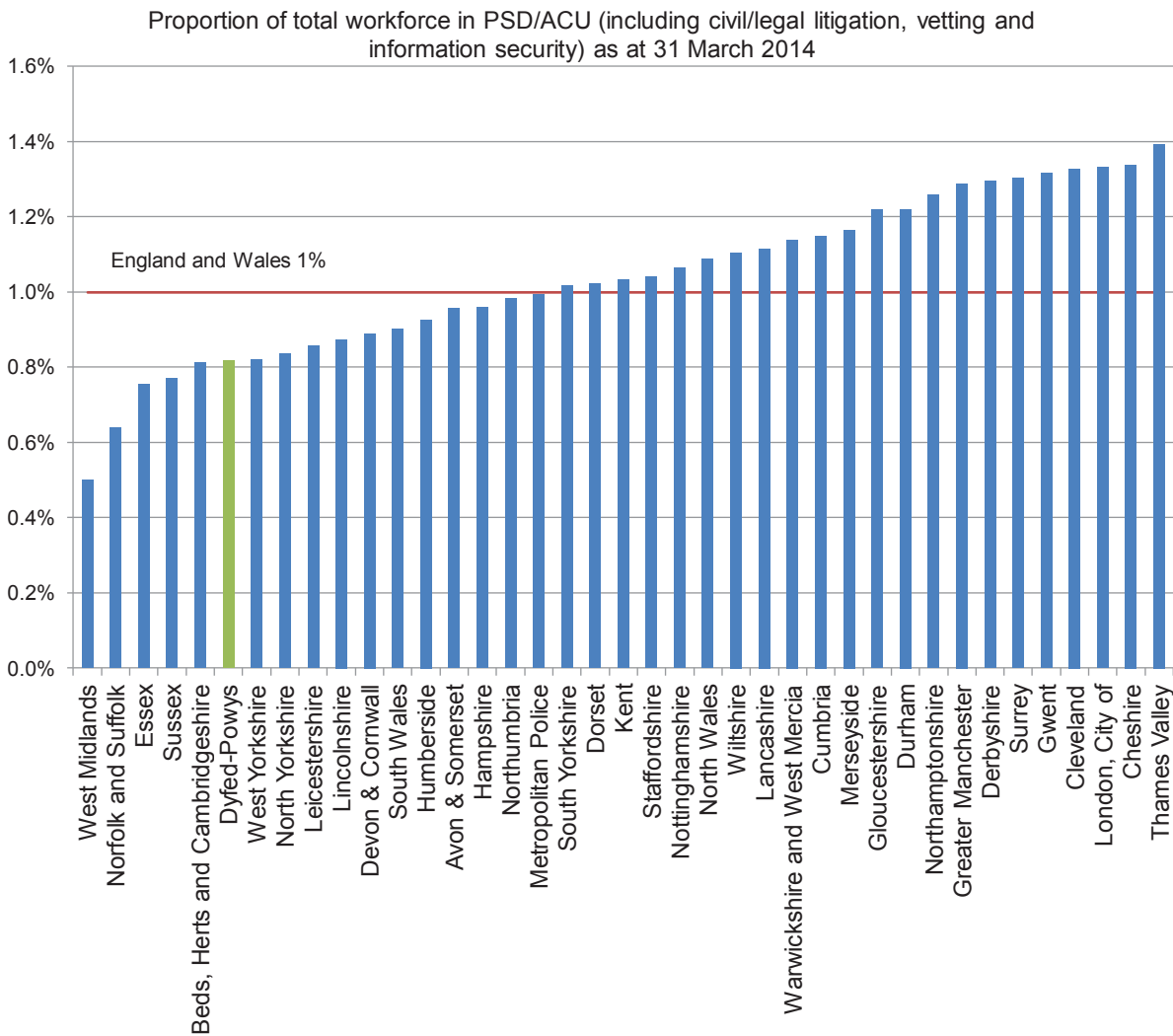
**0.8%**

Proportion of workforce in  
PSD/ACU  
– England and Wales

**1.0%**

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





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

## Introduction

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

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

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

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

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

A national report on police integrity and corruption will be available at [www.justiceinspectors.gov.uk/hmic/](http://www.justiceinspectors.gov.uk/hmic/) in early 2015.

1 *Without fear or favour: A review of police relationships*, HMIC, 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 four areas for improvement in its 2012 Inspection report:

The force has made use of the Self-Assessment Checklist contained in the 2011 HMIC report (*Without Fear or Favour*) to undertake an integrity health check of its policies covering relationships with the media, acceptance of gifts and hospitality, social media use and police officers' secondary employment. The force needs, however, to ensure its staff are more aware of this work.

Good progress has been made in this area and there is clarity and guidance in force policies and procedures concerning the regulation of gifts, hospitality, secondary employment, media relationships and personal associations. Details of all relevant applications are being recorded centrally on the intranet and there is a protocol for approval and review. The system will show where offers of gifts and hospitality are refused. The inspection team found supporting evidence of transparency, staff awareness, compliance and chief officer oversight. In addition, the chief officer team's diaries and gifts and gratuities register are monitored and policed by the chief constable personally. The police and crime commissioner (PCC) is responsible for monitoring the chief constable. The force makes the register available to the public although it was found to be limited in detail.

Officers and staff use social media as a means to engage directly with their communities. The force has identified the risks associated with such online communication but has balanced these against its organisational and public benefits. Individuals understand their personal responsibilities, are trained, supported and held accountable for how they use social networking for policing purposes.

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

HMIC found that there had been limited progress. The procurement manager only reviews the gifts and hospitality register on an ad hoc basis to see if any of the existing contractors have offered any hospitality. There is no evidence of cross-referencing the gifts and hospitality register at the contract tendering stage. However the force has a rigorous procurement policy and invites tenders through recognised Welsh government and national force systems, where the suppliers have been previously checked for integrity and financial stability, and contracts awarded are listed publically. This process is audited by both the Welsh Audit Office and independent auditors.

The force's policy for secondary employment and business interests was in transition and all requests from police staff would be routed through the PSD rather than the human resources (HR) department. Moreover, it was noted that since September 2011, there had been 57 applications for second jobs and all had been approved.

The force has made limited progress in this area. There is a policy in place that is readily available to – and understood by – staff, which clearly explains the procedure and requirements for applications for the approval of a business interest or secondary employment. The applications are initially received by the applicant's line manager for recommendation and are then forwarded to the head of department for approval before being passed to the head of the PSD for a final decision, who takes into account factors such as attendance at work. However, in relation to this area for improvement, the HMIC found that the force does not record applications for business interests which have been refused. The failure to record the refusals prevents a complete analysis or understanding of how effectively the process is applied and the ACU from ascertaining whether officers or staff continue in the proposed secondary employment without permission. The nature of some of the approved business interests caused the inspection team concern that the decision-making process may not be sufficiently robust to safeguard integrity.

There had been some training on integrity issues since the previous inspection in 2011 but changes to policy were communicated to staff using email and intranet systems and there was no mechanism to check that such messages had been read and understood.

There has been limited progress in this area. The chief officer team has provided clear leadership on integrity at a range of seminars and events within the force as part of the programme of cultural change. The message is reinforced by members of the PSD and ACU contributing to courses attended by staff, and using the intranet to raise staff awareness. However, HMIC found that, although the members of the force displayed a high level of pride in delivering their service with integrity, they also expressed a desire for more information and training to enable them to comply with force policies and to be able to 'do the right thing' when making difficult decisions. There are still no mechanisms to check that communications have been read and understood. The online integrity training from the College of Policing (NCALT) is not audited to ensure completion.

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

## Leadership and governance

There is clear leadership from the chief constable on the importance of values, ethics and personal behaviour. He has led an organisational change from a force driven by performance targets to one that has a clear vision of values and ethical behaviour. This change is consistently supported by the chief officers and reiterated at leadership seminars, force events, and in direct communications via the force intranet.

The chief officers are viewed as accessible by officers and staff, a view which is clearly shared by the staff associations. HMIC found that individuals were fully supportive of the changed emphasis towards caring for victims and delivering service with integrity. There is a strong view that integrity is the responsibility of each individual and that there are clearly defined boundaries of appropriate behaviour. The force ethos of 'do the right thing' showed a positive attitude and is seen as a strength for Dyfed-Powys Police to build upon.

HMIC found evidence through interviews and discussions that, although officers and staff have an awareness of the boundaries between unprofessional and professional behaviour, there are still gaps in their practical knowledge about how this translates into their daily activities.

HMIC found good evidence of cases demonstrating individuals were willing to challenge and report unethical and unprofessional behaviour by colleagues. This reinforced HMIC's view that there was a good personal understanding of the force values and the need to take individual responsibility to confront misconduct.

The force intends to develop the understanding of, and compliance with, the new Code of Ethics through reinforcing its existing programme on improving culture and values. Members of the force attended the national launch of the Code of Ethics and also featured in the associated promotional DVD. This DVD is marketed internally as a means of raising awareness. One positive aspect of the force's approach is the enthusiastic view held by senior managers that the new Code of Ethics offers a significant opportunity for the force to reinforce the progress it has already made concerning standards.

There is a clear policy for staff outlining their obligation to declare any change in the circumstances of a personal association or relationship. A general awareness of this exists among the members of the force but they also recognise this is a complex issue and have limited practical understanding of it. Further training would help to improve understanding but must be supported by a process to check the training has been effective. The situation has not been helped by inconsistent interpretation and application of the policy.

There has been some training in the National Decision Model (NDM), which is used in a range of operational disciplines and areas. HMIC found some good examples of how staff understood it could be used effectively and also of how it could be linked to the new Code of Ethics. However, a general understanding of its application within the force is not fully present at all levels.

Training on ethical and professional behaviour is delivered but not to all staff regularly and no checks are carried out to ensure the training has been effective. HMIC found there was insufficient training at a practical level to ensure integrity throughout the frontline. As in 2012, there were still no mechanisms to check whether communications had been read and understood. This included checking the number of staff that had completed the online integrity training from the College of Policing (NCALT). This makes it all the more necessary for the force to address the areas for improvement identified by the 2012 inspection.

Chief officers monitor integrity issues at governance meetings and receive reports from the head of the PSD. Previous shortcomings in this area have been identified by the force and the newly appointed deputy chief constable (DCC) has a clear understanding of how governance arrangements should be improved to manage the PSD and ACU effectively. In addition, since his appointment, the DCC has provided intrusive management of the misconduct procedure. He has also commissioned an external review of the PSD and has initiated remedial action with a change of personnel and additional resources.

## Understanding integrity

While the force does not carry out internal surveys in order to collate views on integrity, there is a clear, ongoing process of cultural change within the organisation. The force acknowledges it needs to restructure the PSD. During interviews and focus groups, it became apparent that the poor historic performance of the department in managing the misconduct process meant that some staff did not trust the PSD.

Details of all occasions on which officers and staff are offered gifts or hospitality are recorded fully in a centrally held database, including those occasions on which the application is refused. This database is audited and inappropriate entries are challenged or investigated. The force has made some progress but still needs to improve further the procurement process and complete audits to cross-check registers. The DCC has proposed a system where all gifts and hospitality offered are recorded online, and this will help staff, some of whom report they are unclear of the policy. The force should use this opportunity to refresh and reinforce its policies and also ensure staff know they must make a record of gifts or hospitality that they decline.

Since rejected business interest applications are not recorded, as detailed above, they cannot then be examined for integrity issues or to determine whether the unsuccessful applicant has complied with the force's decision. While the failure to record rejected business interest applications accounts for the reported approval rate of 100 percent, concerns remain over some of the approvals the force has made and the robustness of the decision-making process. It is worth highlighting that the number of business interest applications which are approved has nearly doubled since last year but there is no evidence of any follow-up by line managers or the PSD to ensure compliance with conditions.

The inspection found no evidence of analysis being conducted to identify any prevalent trends in relation to integrity issues, including misconduct and unprofessional behaviour. This inhibits the force from adopting a problem-solving approach to prevent problems at the outset. This may be a consequence of there being no analytical capability within the PSD.

## Recommendation

**Within six months, the force should ensure 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.**

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

## Misconduct and unprofessional behaviour

Officers and staff recognise the DCC has a strong personal impact in relation to improving the quality of decisions in misconduct matters. The force gives careful consideration to an individual's complete record of ethical conduct during selection processes for the transfer of officers and staff to specialist roles and also promotion.

The force uses a staff hotline called Safe Call, to enable staff to report in confidence on wrongdoing and integrity issues. This is supported by a policy aimed at ensuring individuals feel sufficiently confident to report misconduct and unprofessional behaviour and they receive support in doing so. The usage of Safe Call is very low and it is apparent officers and staff are not confident that the system is sufficiently confidential. The force is aware of this and as a result is purchasing a new system, Bad Apple. The force will have another opportunity to reiterate individual responsibility to report wrongdoing, and its commitment to protecting those who do so, when it communicates the introduction of Bad Apple to the force. The DCC demonstrated personal leadership recently by apologising to a member of staff who received poor treatment after reporting misconduct.

The force responded to reports of wrongdoing by staff in an effective but not timely manner. HMIC found there were a considerable number of outstanding cases, in particular public complaints, which were suitable for resolution at a local level. HMIC also found examples of investigations from public complaints taking considerably longer to complete than they should. During reality testing, interviews and focus groups further examples of poor timeliness were found including cases remaining open after two, three or even four years. This is acknowledged by the force and is an area for improvement.

HMIC found the force generally investigates reports of wrongdoing by staff in an effective manner. Referrals are made to the Crown Prosecution Service and the IPCC even when this is not required by the statutory guidance. The reality testing conducted by HMIC further found that outcomes from the investigations we examined appear proportionate and consistent.

## Recommendation

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



The current difficulties could be partially resolved if the PSD were not responsible for all misconduct investigations, including those of a lower level of seriousness, and local management and HR were involved to a greater extent.

This would enable the PSD staff to focus on the more serious matters as well as continuing to oversee misconduct procedures in general. This proposal is supported by the head of HR who has clearly underlined the advantages it would bring in terms of timeliness and proportionality. There is the further opportunity of providing more training to locally based inspectors and sergeants to enable them to conduct lower level misconduct investigations more effectively. This would reduce the PSD's workload as well as reinforcing the role of local managers to fulfil their responsibilities for managing their own staff.

The PSD and ACU staff give presentations to a range of courses including those for newly appointed or promoted staff. Such courses are comprehensive and contain a number of case studies to add context. There is no specific training to equip supervisors to manage misconduct issues or enable staff to recognise and respond to ethical challenges. Although officers and staff demonstrate a desire to do the right thing, they do not necessarily have enough practical knowledge and understanding to translate this desire into better behaviour. One of the force's strengths is that its officers and staff are committed to taking personal responsibility and willing to challenge unethical conduct.

HMIC found clear evidence of the force making appropriate referrals to, and following guidance from, the IPCC during their file reviews and reality checking.

The IPCC bulletin is also used to disseminate learning and the force has an efficient and effective Learning from Lessons procedure in place. HMIC were provided with examples of this procedure and the lessons it imparted being understood by individuals who were, as a result, able to improve the service they offered.

## Professional standards training and resourcing

All staff in the PSD and ACU have undertaken training that is specific to their role. All officers and staff in investigation roles are either serving police officers or retired officers, with an investigative background appropriate to the role and function. The PSD investigation staff have attended the national investigating skills course and the head of the department has also attended the course on investigating deaths following police contact. The ACU staff have attended the ACPO Counter Corruption Advisory Group seminars which include recent case studies. The head of the ACU has attended the national silver ACU course and his assistant has attended the bronze course.

Succession planning is now personally managed by the DCC and the new departmental head has been selected because of his professional and personal skills, and because he has a thorough understanding of the departmental changes the DCC requires.

The PSD and ACU are not yet adequately resourced to perform their main and critical functions of being able to proactively look for, and effectively challenge and investigate misconduct and unprofessional behaviour. HMIC acknowledge the DCC has recognised the departmental weakness and, after commissioning an external review, has initiated a programme to improve capability and performance.

## 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.**

## Quality assurance

It is accepted that misconduct hearings are held on an infrequent basis and, since the force is small, there is often detailed awareness of the circumstances of such hearings across the force. HMIC found the force has used assistant chief constables from other forces to chair gross misconduct hearings to ensure independence, transparency and to learn lessons from their feedback concerning the quality of the decision-making process and the investigations.

The force should use its PSD to oversee all stages of each investigation where managers from other forces are asked to assist. The force needs to be able to audit and quality assure the outcomes of investigations and management action, so that comparable decisions, outcomes and case disposal is consistent across all ranks.

The force has a clear policy concerning the suspension from duty of police officers and police staff. The DCC has taken personal responsibility for all decisions on suspension and discharges this function in a balanced and proportionate way. HMIC found a careful and documented decision-making process with each case being assessed on its merits and with other options considered as an alternative to suspension. Police officers and staff were found to have been dealt with in a consistent manner. Decisions were regularly reviewed to assess any change in circumstances. The staff associations are supportive of this process and the opportunity that the DCC gives them to make representations. HMIC 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 ACU makes use of the national crime agency (NCA) counter-corruption threat assessment that identifies threat and risk issues of potential relevance to the force. The PSD does maintain a risk register which is incorporated into the force's wider corporate risk management document. However, there was no direct reference to integrity and corruption, and the steps prescribed on the register did not provide evidence of a concerted approach to manage the threat, risk, and harm confronting the organisation from unethical behaviour, or the existence of an effective governance structure to do this. The PSD and ACU are not at present sufficiently resourced to undertake a comprehensive risk management exercise in compliance with either the NCA guidelines or authorised professional practice on counter-corruption.

The force does very little to identify vulnerable staff, be they individuals or groups. HMIC were told the force conducts ethical interviews with vulnerable staff regarding debt problems or substance abuse. The intelligence to support such interviews and identify vulnerable individuals, however, is only provided through the vetting process or when information is received from other organisations, such as the non-payment of council tax notices reported to the force's finance department

The force's vetting arrangements are compliant with the national vetting policy and identify corruption risks at the recruitment stage for both officers and staff. Vetting is repeated on promotion to senior ranks and for posting to sensitive and vulnerable roles. The force has a documented vetting policy which outlines various procedures, and there is a clear requirement for individuals to report relevant changes in their circumstances. The PSD has overall responsibility for vetting and there is close communication between vetting staff, the PSD and ACU leading to effective information sharing and problem solving.

The force undertakes limited monitoring of social network usage by staff but does publicise the risks associated with its inappropriate use. Ten members of staff have received management action and one has resigned after making inappropriate online comments concerning a high profile criminal case. The force has invested in a monitoring system to ensure proper use of its IT systems and completes a range of audits of force systems and databases which have reduced the number of instances of wrongdoing identified. For the period 1 April 2012 to 31 March 2013 there were 67 misconduct investigations relating to information disclosure, compared to 35 for the last year. Of the 35 cases, 30 resulted in no further action with four people receiving management action and one, a written warning.

There was limited information for staff about the extent to which the force undertook random and with cause substance misuse testing to identify unethical behaviour. There is a force policy on the issue and the ACU make presentations on substance abuse to staff attending courses. HMIC found there had been no random or with cause drug testing for the two year period ending on 31 March 2014. Voluntary drug testing does however take place. The force should provide clarity to staff about its approach to substance testing and confirm who is accountable for such activity. The force should consider updating the 2009 alcohol and misuse policy and make it clearer to staff what is expected of them in their professional and public lives.

## Recommendation

**Within six months, the force should ensure it has a policy on substance misuse and drug testing to identify and deter substance misuse. The force should communicate this to all staff.**

The force is reviewing its processes to ensure that organised crime investigations are not compromised and that it has the capability to mitigate the risks that forthcoming operations may be compromised by the threat of corruption. The force has decided not to appoint an operational security manager to co-ordinate security. The force therefore currently relies on the details of organised crime suspects being forwarded by a force analyst to the ACU for research to determine if anyone has been using its systems to conduct searches on that individual. In these particular cases, the ACU utilises the 3AMI software as a monitoring tool. The force should improve the formal liaison between the head of crime and the head of the ACU to discuss ongoing cases and how they can be mitigated from the threat of corruption. ACUs need ready access to specialist assets to assist with their proactive investigations, whether this is surveillance capability or other assets provided by the force or at regional or national level. Attendance by the head of the ACU at force tasking and co-ordination meetings would also assist in this respect.

## Recommendation

**Within six months, the force should ensure it has effective processes to minimise the risk of compromise to investigations into serious and organised crime.**

The force has procedures in place to assist in ensuring the security of systems, exhibits and case papers. There is a clear information security policy which clarifies what is required and the general principles of information security. The force capability has been improved through the adoption of an electronic property management system.

## Intelligence

There is evidence that the force gathers and appropriately grades intelligence which is assessed as actionable. The force uses the national intelligence grading system and records decisions on a PSD/ACU intelligence system. The force source handling unit does have an intelligence plan in place, which allows the force to identify corruption if a source alleges this. There was, however, no evidence of systematic analysis being undertaken to develop intelligence. The lack of resources prevents effective intelligence gathering and the absence of research and analysis capability is a significant concern. For example, a dedicated ACU intelligence analyst would be able to follow-up refused business interests, and use the National Crime Agency (NCA) threat assessment to profile vulnerable and high risk groups in the workforce.

The force lacks an effective anti-corruption strategy and an associated process by which it can identify and manage risks to the organisation's integrity. To be effective, such a strategy must be supported by an intelligence plan and strong tasking, co-ordination and governance processes.

It is not clear if the force is effective in identifying multiple suspects and multiple offences by a single suspect, as the force does not have the processes to ensure such identification takes place because the force lacks analytical capability within the department.

## Capability

The ACU has insufficient capability and capacity to be proactive. The force acknowledges this and knows it is an area for improvement. It also recognises the need to increase its capacity for analytical work. The PSD and ACU can bid for specialist support from specialist or covert assets such as surveillance held either by the force or elsewhere.

The DCC is very supportive of the misconduct and anti-corruption processes and is committed to ensuring they become effective. The ACU and PSD heads have a clear and direct reporting line to the DCC and can approach him directly when required.

The DCC oversees the misconduct process and also chairs the Learning from Lessons forum at which the PSD has a representative. This effectively collates information derived from all sources and disseminates lessons to be learned from misconduct procedures across the force. Relevant information is published through the force intranet. This includes, among other things, the details and findings of gross misconduct hearings.

Cases are appropriately referred to the IPCC in accordance with the statutory guidance and a constructive relationship has been established. File reviews and reality checking supported this.

## Recommendations

- **Within six months, the force should ensure 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.**
- **Within six months, the force should ensure it has sufficient capability and capacity to enable the recording and conducting of timely and proportionate investigations into public complaints.**
- **Within six months, the force should ensure that it has the proactive capability to effectively gather, respond and act on information which identifies patterns of unprofessional behaviour and corruption.**
- **Within six months, the force should ensure it has a policy on substance misuse and drug testing to identify and deter substance misuse. The force should communicate this to all staff.**
- **Within six months, the force should ensure it has effective processes to minimise the risk of compromise to investigations into serious and organised crime.**