



Inspecting policing
in the **public interest**

Police Integrity and Corruption

Gloucestershire Constabulary

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

Gloucestershire Constabulary has made some progress on the areas for improvement identified by HMIC in 2012. There is clear and active leadership from the chief officer team to reinforce integrity and embed the Code of Ethics, but more is required to develop the understanding of relevant policies amongst the workforce. Staff are confident to report wrongdoing and the constabulary responds in an effective and timely manner. However, the level of resources available to conduct proactive anti-corruption activity needs to be reviewed.

Summary

Clear messages emphasising professional behaviour and integrity are provided to members of the constabulary, and there is frequent dialogue between leaders and the workforce. There is a clear plan to embed the Code of Ethics through the Code of Ethics Board chaired by the assistant chief constable. The Code is also reflected in personal development objectives assigned to all staff. Members of the constabulary are aware of the focus on integrity; however, some are uncertain about relevant constabulary policies, including the recording of gifts and hospitality.

There are a number of methods available to staff to report wrongdoing confidentially, although some staff are concerned about the level of support they may be offered if they make such a report. The constabulary responds to such reports in an effective and timely manner. The PSD requires more staff to increase the capacity for proactive work, such as monitoring and investigating the misuse of constabulary information systems. Work is also required to ensure the constabulary is able to proactively identify, investigate and deter corrupt behaviour. This should include effective vetting of staff who apply for promotion, cross-referencing of records and information (including procurement processes) and the identification and monitoring of staff who may be vulnerable to corruption.

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

Overall some progress against the two areas for improvement in 2012 has been made.

There has been no progress in relation to the cross-referencing of registers recording gifts and hospitality, chief officer's diaries and expenses and the constabulary's procurements processes.

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

Chief officers consistently reinforce standards at management meetings, road shows, workshops, bulletins and in personal dealings with officers and staff.

There is a clear plan to embed the Code with chief officer lead at the Code of Ethics board.

Supervisors use individual monthly meetings with team members to discuss and reinforce standards.

All members of staff have PDR objectives related to the Code.

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

Misconduct and unprofessional behaviour are considered in relation to transfers to specialist roles and promotion but not always prior to attendance on courses.

There is support for investigations where specialist or technical services are required.

The time taken to complete investigations has recently increased.

The analytical support required to carry out preventive work and cross-reference information to identify corruption should be increased.

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

The constabulary carries out risk analyses and directs investigation in response to intelligence received.

There is regular chief officer oversight of corruption investigations.

There is a backlog in vetting and for some recent promotion processes, vetting was not carried out.

The anti-corruption unit (ACU) does not have sufficient trained staff to manage intelligence effectively.

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 constabulary made in communicating and making sure staff knew about ethical and professional behaviour to all staff, including the new Code of Ethics?

The constabulary has published a statement of values.

There are gaps in understanding of force policies, including the requirements for reporting gifts and hospitality.

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 constabulary has no process in place to evaluate and direct a sustained programme to prevent corruption and protect against corrupt activity.

The constabulary does not effectively monitor its information systems or cross reference records to identify potentially corrupt links.

The force/constabulary in numbers



Complaints

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

326

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

17.3

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

26

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

1.4

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

2.6



Business interests

Applications in 12 months
to March 2014

215

Approvals in 12 months
to March 2014

213



Resources

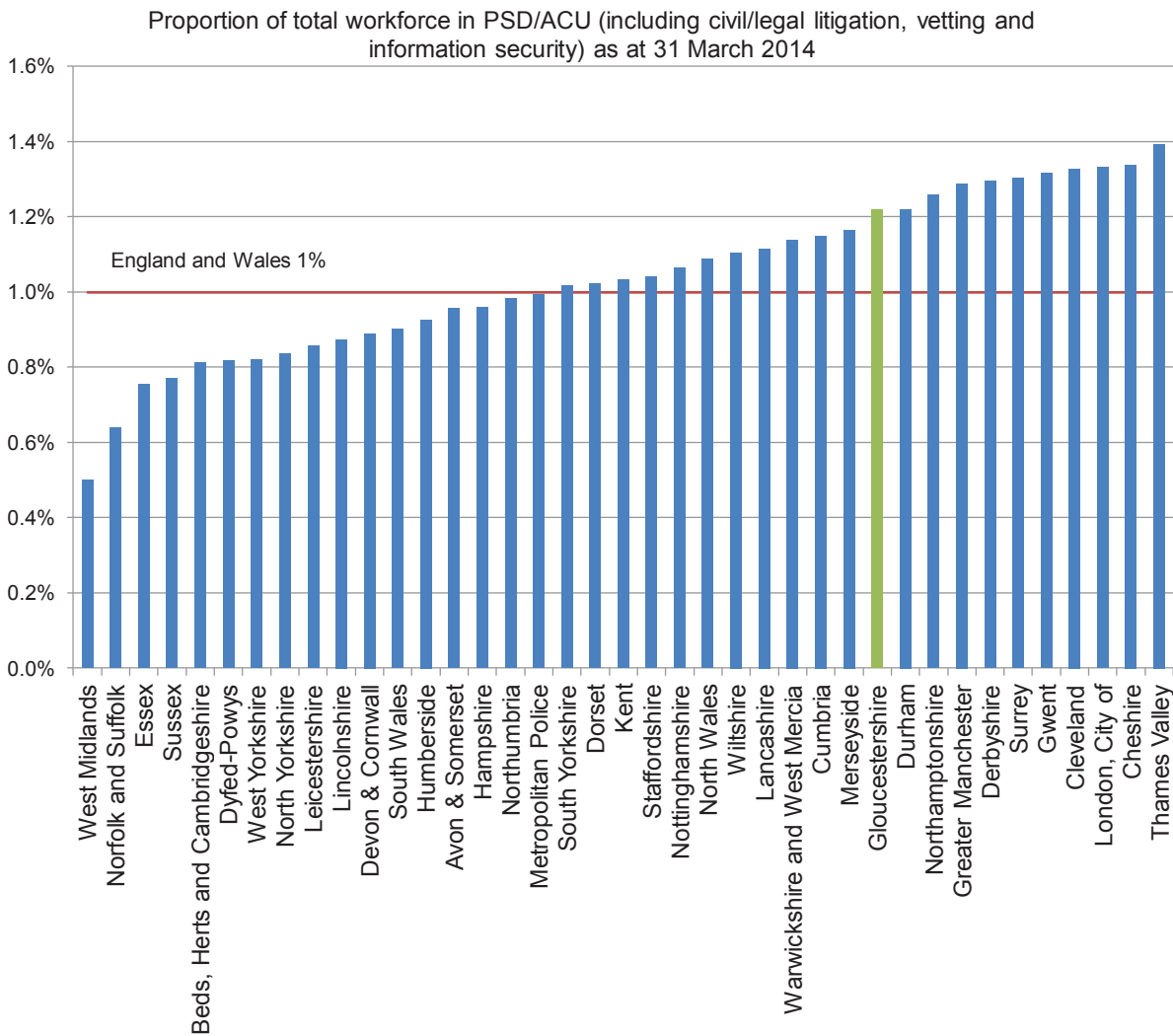
Proportion of workforce in
PSD/ACU

1.2%

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*¹ 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*² 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.³ 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/ 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

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 inspection of Gloucestershire Constabulary in 2012 HMIC found two areas requiring improvement:

- (1) The levels of understanding among operational staff over whether particular items may or may not be accepted as gifts or hospitality and whether these should be recorded.
- (2) The implementation of cross-referencing between the contract and procurement registers and the gifts and hospitality register to help ensure the integrity of the procurement process.

HMIC found that limited progress has been made in relation to the gifts and hospitality policy. This had been reviewed and was updated in July 2014. However, while staff knew about the policy there was still some confusion about what should be accepted or declined.

HMIC found that there has been no progress in cross-referencing registers in relation to contracts and procurement.

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.

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

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 leadership from the chief constable on the issues of ethical and professional behaviour. When she took up post in February 2013, the chief constable addressed all senior managers, outlining her expectations in relation to standards of behaviour. This opening presentation was followed up with a series of visits and personal briefings to groups of officers and staff. Subsequently the chief constable has set aside half a day every month for meetings with officers and police staff. In addition there are monthly meetings of senior leaders, including chief superintendents and equivalent police staff managers as well as a separate senior leaders' forum at which ethics and integrity matters are discussed.

There is evidence that chief officers consistently reinforce standards at senior management meetings, road shows, workshops, in bulletins and through personal dealings with operational police staff and officers.

The chief constable also used the joint road shows, held with the police and crime commissioner (PCC) on the publication of the policing plan, as an opportunity to reinforce standards.

A number of staff indicated that the chief constable is seen as approachable and as someone who leads by example. This perception was shared by the members of the chief officer team and senior leaders.

The evidence gathered from HMIC's inspection suggests that officers and staff are aware of the boundaries of professional behaviour and understand how their behaviour affects both the public and their colleagues. Staff who were spoken to in focus groups and at unannounced visits referred to guidance they had received in handouts, bulletins, emails and posters. Most staff are aware of regular reminders being provided on these issues. The same standards are expected from officers and police staff.

Officers and staff feel that almost all leaders (including first line supervisors) lead by example and challenge inappropriate behaviour. There were a number of examples where the chief constable had personally challenged behaviour and standards. However, some supervisors are considered to be less effective, or less willing to challenge inappropriate behaviour, in particular those who are temporarily appointed to a supervisory role and are working with colleagues from their own unit.

The constabulary has a practice of 'job chats' where supervisors meet with individual team members on a monthly basis to discuss professional and personal issues. In certain cases these are used to reinforce ethical standards. HMIC found that supervisors are committed to ethical behaviour and that they use these personal sessions to disseminate messages on ethical behaviour and discuss ethical dilemmas using examples. However, this process is not reinforced by regular checks on how well staff understand the relevant policies and issues. Consequently, there are gaps in the understanding of some members of staff on some aspects of these policies.

The constabulary has developed a plan for communicating the Code of Ethics to officers and staff and ensuring it is incorporated into their work. This plan is being implemented effectively; the assistant chief constable (ACC) responsible for leading on this plan chairs a 'Code of Ethics Board'. Meetings of this board are attended by managers who are responsible for allocating tasks to members of the constabulary in respect of promoting the Code. Every member of staff employed by the constabulary has been allocated a specific objective relating to the Code of Ethics in their 2014/15 personal development review (PDR).

The constabulary demonstrates its commitment to ethical behaviour through a statement of values, intent and principles. This statement was updated in 2013. The values, intent and principles are centred on the Code of Ethics and are displayed effectively in posters and other material across the constabulary.

Staff are aware of their responsibilities to challenge and report misconduct and unprofessional behaviour. However, some staff have concerns about the support that would be provided by the constabulary if they were to report wrongdoing by a colleague. Staff recognise that some support may be available through staff associations or other welfare services. However, the constabulary does not appear to have established and promoted support mechanisms to ensure the reporting of wrongdoing is encouraged and should take the opportunity to address this.

HMIC examined a number of the constabulary's policies during its inspection; however, this inspection did not provide a comprehensive audit of the application of all of the policies that the constabulary has in place. All the policies are reviewed regularly but misconduct and unprofessional behaviour is not clearly explained in all of them, which could be done through the inclusion of practical details or examples.

The constabulary has clear policies on gifts and hospitality as well as on the requirement to declare business interests and any associations that may give rise to a risk of corruption. The policy on business interests includes a clear process to be followed when applying for approval of a business. These policies are communicated to officers and staff through bulletins, personal emails and senior leader forums.

Most staff know about the existence of the various policies but many members of staff are uncertain as to the detail of these, including the types of associations that need to be reported and about which gifts should be declared. For example staff were uncertain whether the offer of a discounted meal from a hotel in recompense for having provided a substandard room or the acceptance of flowers and chocolates given by a victim of crime would be acceptable or not.

HMIC found a need for additional guidance and clarification on these issues to ensure that staff understand the purposes and practical requirements of these policies.

The chief officer team consistently emphasises the standard of behaviour that is expected, including workshops led by the assistant chief constable. There is evidence that ethical dilemmas are discussed at senior leaders' meetings and documents referencing these discussions have been disseminated to the wider force.

There is a monthly governance board meeting at which the formal exchange of information between the constabulary and the OPCC, along with the process for making decisions, is discussed. The PCC is then informed about all matters affecting ethical and integrity issues arising from these meetings.

The OPCC is represented at a range of other strategic meetings, for example the OPCC's chief executive attends the senior leaders' board. The OPCC's chief executive and private secretary monitor the work of the professional standards department (PSD) within the constabulary.

There are regular meetings between the assistant chief constable (ACC) responsible for integrity and misconduct matters and the head of the PSD. These meetings include a formal monthly meeting at which tasks are assigned to particular parties and progress with these is reviewed. In addition the ACC meets with the detective inspector and the detective chief inspector from the PSD, as well as the detective inspectors from the anti-corruption unit (ACU) once a month to discuss new investigations into misconduct and the progress being made on current investigations. Where required the ACC updates the chief officer team on integrity issues or misconduct cases.

There is also a monthly meeting of the sensitive information sharing group (SISG). This is chaired by the head of the PSD and attendees include the head of the ACU, the constabulary's solicitor, head of human resources (HR) and a representative from the vetting team. At these meetings individual cases are discussed and attempts are made to identify any emerging trends. The head of the PSD reports on the outcome of these meetings to the ACC.

These measures provide effective oversight of integrity matters and the investigation of misconduct.

Understanding integrity

The gifts and hospitality register is centrally held by the PSD and is audited quarterly by the ACC. Offers of gifts and hospitality made to officers and staff are recorded but it is not clear that all declined offers are being reported or recorded.

Senior officers' expenses are published on the constabulary's website as is the gifts and hospitality register although this information is not easily found when navigating the website. The information provided covers all officers and staff and includes both accepted and rejected offers.

The constabulary and the OPCC jointly commission an annual internal audit plan. Auditing is carried out by Gloucestershire county council. The plan covers a range of financial and other business areas and aims to ensure that effective oversight of financial management.

All business interest applications; including those which have not been authorised, are recorded in a centrally held register. Business interest applications which have been approved are routinely reviewed with the applicant at their annual performance development review (PDR) conducted by their line manager.

Approval for a business interest is automatically reviewed if the applicant subsequently takes more than a designated amount of sick leave. In these circumstances approval to continue the business interest or secondary employment may be suspended or revoked.

The number of business interest applications that are rejected by the constabulary is low, (three over the last two years). However, the PSD had followed up on these cases to ensure the applicant was complying with the decision that had been made.

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

Misconduct and unprofessional behaviour

Complaints from members of the public that require more detailed investigation and allegations of misconduct involving police officers are investigated by staff from the PSD.

Misconduct and unprofessional behaviour are taken into account in relation to applications for a transfer to a specialist role or a promotion. However, they are not always considered in relation to applications for a place on some training courses.

The role of 'appropriate authority' (AA) (required by the police misconduct regulations) has been delegated to the deputy head of the PSD, who is a detective chief inspector. There is a separate AA within the HR Department who deals with matters involving police staff. These arrangements meet the requirements of the relevant regulations.

Most staff interviewed by HMIC consider that officers and staff are treated fairly by the constabulary. The PSD oversees the investigation of those complaints received by the constabulary assessed as suitable for resolution on a local level; however, the actual investigation of these is carried out by divisional managers. A significant proportion of these investigations are subsequently assessed by the PSD as not meeting the standard required for the proper resolution of the complaint. Many of those interviewed indicated that this was the result of a lack of training for the officers dealing with these complaints.

There are a number of ways members of the constabulary can report wrongdoing or unprofessional behaviour or refer matters to the PSD or the ACU. There is a confidential anonymous email reporting system and a confidential telephone line, with an accompanying user guide. The email system is used predominately for reporting unethical behaviour; 43 reports of which had been received over the previous year.

Furthermore, they can use the publicly accessible 'crime stoppers' website (a service available for both the public and staff to use).

These anonymous reporting systems have been well advertised across the constabulary and all interviewees were aware of them. However, there is some scepticism that they are truly anonymous and many of those spoken to during the inspection emphasised that they would prefer to raise any concerns with their line manager than make use of these systems.

There is a climate in which staff feel confident to report misconduct and unprofessional behaviour by individuals or groups. Over the last eighteen months awareness of personal responsibility and the need to challenge and report unprofessional behaviour has increased and a number of examples of this taking place were provided during the investigation.

The constabulary responds to reports of wrongdoing by staff in an effective and timely manner. However, some staff expressed concern about the level of resources available to the PSD, which affected its ability to complete investigations efficiently.

The outcomes of misconduct hearings are communicated through weekly bulletins. The chief constable has also informed the editors of various local media organisations that the outcome of these hearings will be made public in the future.

Professional standards resources and training

Training on integrity issues is provided to all new recruits and those transferring into the constabulary from elsewhere as part of their induction process. Other training on ethical and professional behaviour is provided on 'Leaders days'. The constabulary also uses the College of Policing approved computer e-learning package, but most staff did not consider this to be effective in dealing with issues around integrity and ethics.

The National Decision Model (NDM) is understood by most police officers in the constabulary. The NDM is incorporated into police 'tutor constable' training, initial and 'refresher' training about using the 'taser' device as well as officer safety training. It is also included as a reminder in officer's pocket notebooks and in the values, intent and principles posters displayed within police premises. It is less clear whether police staff in non-operational roles are similarly aware of the NDM or that the model is being used by officers or staff in relation to ethical issues.

The PSD is the only department that did not see a reduction in staff during a recent review. In fact, it was expanded to include a superintendent post. Nevertheless some staff feel the department needs more staff and resources to meet the demands it faces, in particular in dealing with investigations. There is evidence that the speed with which complaints investigations undertaken by the constabulary are completed has diminished in the last twelve months. This may reflect a need to ensure that the level of resources available to the PSD is sustained.

The succession planning in place in relation to posts within the PSD and the ACU is exercised through an executive selection process by the chief officer group following advertisement for expressions of interest. Although at the time of the inspection, within the information assurance team there were three unfilled vacancies at the middle management level (vetting manager, information assurance manager and the records manager), these were being progressed.

The PSD and the ACU are able to call upon assistance from specialist or technical services within the constabulary as well as from other regional sources where this is necessary to support their work in carrying out investigations.

There are no analysts within the PSD or the ACU and the constabulary is not able to carry out analyses in order to identify trends in relation to integrity issues. Work to cross-check senior officers' diaries and expenses with service procurement contracts and other records is not being carried out.

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.

Misconduct hearings are conducted by an appropriately qualified presiding officer, who is independent of the person being investigated. Misconduct hearing panels include a lay member and appropriate advice and guidance is given to the presiding officer and panel. After every hearing a review process is carried out to ensure consistency, transparency and fairness.

There have been very few gross misconduct hearings in the constabulary and it has not therefore used a fast track dismissal to date, but this remains an option that could be used in appropriate circumstances.

Quality assurance

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.

Decision making in these cases was appropriate; an assessment of the severity of the misconduct had been completed in every case and investigation plans were included where necessary. In appropriate cases, referrals were also made to the Independent Police Complaints Commission (IPCC).

The constabulary makes effective use of issues identified in other cases. The PSD considers the IPCC 'lessons learned' bulletin and forwards this on to the relevant supervisors in respect of each lesson, inviting them to consider the contents and respond where appropriate. All such responses are collated and fed back to the 'service learning board' which identifies learning needs and decides training provision. IPCC bulletins are also placed on the constabulary's bulletin board and distributed to staff.

In the cases we examined referrals are made to the Independent Police Complaints Commission (IPCC) where this is appropriate.

The constabulary carries out audits of the decisions made at hearings of allegations of misconduct or unprofessional behaviour against officers and staff. As there had only been a small number of hearings in respect of allegations of gross misconduct, the constabulary had been able to review each of these individually.

However, there is are no analytical processes in place to ensure that investigations carried out by the PSD are dealt with at the right level and escalated or de-escalated appropriately. Each case being investigated by the PSD/ACU is reviewed at a monthly meeting, but there are no processes in place to identify trends or systemic issues arising in these cases.

The constabulary ensures that all the investigations it carries out in relation to officers and staff are undertaken in a timely and effective manner. The PSD oversees all cases being dealt with by HR and manages all complaints received from the public to ensure each case is recorded, investigated and resolved effectively and within the target time.

The PSD detective inspector approves the resolution reached in all cases that have been investigated locally. HMIC found where cases are allocated for investigation to inspectors within the local areas, the investigation takes longer compared to those retained by the PSD. The reasons for this difference need to be examined by the constabulary.

The constabulary has a clear process in place to identify and record any learning points that arise from investigations. Indeed, it was evident this had taken place in respect of one of the cases HMIC reviewed as part of its sample. Learning points are disseminated effectively, through bulletins, the internal website, meetings at a local, senior and regional level and a newsletter produced by the PSD. The results of misconduct hearings are published internally and examples of behaviour that have fallen below expected standards are published in the weekly bulletin.

The constabulary uses a consistent decision making process on suspension, resignation and retirement and where possible all decisions on these are made by the same ACC.

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

Corruption investigation

The constabulary has processes in place to identify the risks it faces in terms of corruption and to manage the harm this can cause. There are formal daily and weekly meetings to decide tactics around individual operations and monthly meetings to examine longer term strategies.

These meetings are supplemented by informal meetings and regular discussions between chief officers and the PSD senior management team. The small number of individuals working within the PSD and the ACU means there is a close working relationship between the two. Where appropriate the ACU passes on intelligence it has received to colleagues in the PSD, who then continue to develop this and where necessary carry out action on the basis of it.

The absence of an analyst within the ACU means that the unit is reactive in its operation although each piece of intelligence received is assessed and investigated appropriately.

Vetting arrangements by the constabulary comply with the national vetting policy requirements and are used to identify potential risks of corruption at the recruitment stage for officers and staff.

The constabulary's vetting policy was reviewed and updated in July 2014. The policy requires vetting checks to be revisited on promotion or posting to sensitive or vulnerable roles. However, there is a backlog in cases being dealt with. The period over which it is expected the constabulary will complete security and recruitment checks for all members of staff has now been extended from two to three years. There is also evidence that in some of the recently conducted promotion processes, vetting had not been carried out. In 2015 a new vetting code will be produced by the College of Policing and the constabulary will need to ensure it is prepared to comply with the conditions of that code.

The constabulary has corporate accounts on Facebook, Twitter and Pinterest. These accounts are used to release information to the media and appeal for information.

The constabulary also supports social media use by groups of officers and staff. Training in its use is provided and monitored by the community engagement department. The use of these accounts is covered by a social media policy. The constabulary monitors the use of its systems and social networking sites using software that scans sites for key phrases and words. This has proved especially useful around key events including the police operation relating to the national badger cull.

The constabulary does not routinely monitor the private Facebook and Twitter accounts of officers and staff. The constabulary has run a campaign to remind staff about the appropriate use of these sites and highlight some of the potential pitfalls with personal use.

The constabulary conducts random and 'with cause' drug tests and carries out integrity testing on the basis of intelligence it receives to identify and deter corruption. To date the random drug tests have not produced any positive results.

In order to ensure that organised crime investigations are not compromised, the ACU examines the minutes and action points from the constabulary's tactical tasking and co-ordination group meetings. The head of the ACU also attends the covert tactical tasking and co-ordination group and the sensitive information sharing group. This provides the ACU with insight into the operations that are being carried out and provides the unit with scope to monitor or intervene in these. However, it is not clear whether the constabulary assesses how effective this approach is at deterring or preventing the compromise of operations.

Intelligence

The PSD and ACU are aware of the need to comply with the 'Authorised Professional Practice' (APP) policy for counter-corruption although the version in use at the time of the inspection was still in draft form. The constabulary seeks intelligence from a number of sources including direct reports from members of the workforce and from Crimestoppers, an anonymous reporting system. Each piece of intelligence that is gathered is analysed and graded, as is apparent from the records held on the ACU's standalone secure system. Examples were provided of where multiple suspects and multiple offences by a single suspect had been identified. The progress that is being made with each piece of intelligence is monitored through regular discussion and monthly meetings.

The constabulary does not use special software to monitor use of its internal systems and only investigates cases if it has received intelligence suggesting there may have been some misconduct. This approach is inefficient and less effective during investigations. The use of appropriate software would also give rise to significant opportunities for capturing data and gathering intelligence, which the constabulary is currently unable to exploit.

Staff within the ACU have to develop pieces of intelligence that have been received without the benefit of an analyst trained and experienced in the work. This reduces the effectiveness of the process and absorbs time that might otherwise be spent on investigation.

The ACU has insufficient capacity to proactively manage intelligence that it receives or to undertake regular proactive operations.

There is evidence that meetings are being held where investigations are reviewed and there are meetings at which sensitive information is considered. However, it is clear that there is no formal co-ordination process for the PSD and the ACU, which would allow for the effective evaluation of work being undertaken and the development of a clear plan for a sustained programme of work to protect the constabulary against corrupt activity.

This has been recognised by the constabulary to some extent and it has recently appointed a senior officer to lead the PSD and the ACU. However, more work is needed to ensure that the PSD and the ACU can be proactive and effective in their work.

Capability

There is no analyst within the PSD. Some of the ACU staff have attended the relevant counter-corruption courses but training is not provided regularly.

While staff within the ACU understand what is required from them, the unit lacks the numbers and resources to carry out more proactive work. There is a need to examine this and ensure the ACU has a sufficient number of staff to allow it to carry out the necessary proactive work.

The performance of the PSD and the ACU are regularly monitored during oversight meetings. This includes analysis of the speed and quality of investigations into complaints; how decisions are being made; and the outcomes of investigations, hearings and appeals. The progress that is being made with tasks is tracked and those responsible for particular tasks are held to account.

The head of the ACU is a detective inspector. She has a clear and direct reporting line to the head of the PSD and the relevant ACC.

The sample of cases examined by HMIC confirms that cases are referred to the IPCC in accordance with the relevant statutory guidance.

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