



Inspecting policing
in the **public interest**

Police Integrity and Corruption

Gwent Police

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

Good progress has been made since HMIC's report in 2012 on managing professional and personal relationships with integrity and transparency.

Gwent Police has worked hard to instil ethical and professional behaviour. However, more training on integrity issues and efforts to promote confidence in challenging poor behaviour is required. Decision-making and recording processes in the professional standards department (PSD) need to improve. Some integrity-related policies also need to be reviewed and the management of workflow in the PSD should be more efficient.

Summary

There is clear leadership from the chief constable and deputy chief constable in promoting ethical and professional behaviour. The force risk management group effectively manages threats to the organisation. A staff opinion survey has been undertaken to help chief officers understand the issues the force faces.

Not all staff are confident to challenge poor behaviour, although they understand what is expected from them. New officers and police staff have received integrity training but the force needs to do more to deliver integrity training to all staff.

Some poor decision-making and record-keeping within the PSD was identified. The PSD investigate all levels of complaints and consequently the department is overloaded and investigations are too slow. The PSD does not have the capacity to proactively address wider corruption and staff misconduct issues that may pose a threat to the force.

The force has processes in place to identify vulnerable officers and staff. These corruption identification processes are effective and a real strength to the force.

The force has been proactive in its approach to identifying members of staff who may be at risk of abusing their powers for a sexual motive. In addition, they have also identified the improper disclosure of information to family and friends as one of their priorities for action.

Good progress has been made since HMIC's report in 2012. Staff are aware of their responsibilities regarding integrity. The force has carried out proactive work around highlighting the risks of using social media. However, the force should prepare for the introduction of a new national vetting code in 2015 in order to comply with the conditions.

Random drugs testing should be re-introduced and the gifts and hospitality policy needs to be made more effective.

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

Two areas were identified for improvement in the 2012 report.

The first related to the gifts and hospitality register. This is now centralised but more could be done to improve it.

The second related to how officers and staff understood the issues of integrity. While training has been rolled out, there is no mechanism to ensure that staff have read and understood the policy.

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 deputy chief constable are clear about the standards they expect from staff.

Some important integrity-related policies are out of date or need to be developed further.

Training has been delivered to staff but records of who has attended are poor.

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

The PSD decision-making processes need review and improvement.

Investigations are too slow.

Local managers do not have the skills necessary to handle complaints and the force does not have a culture in which people feel comfortable about challenging wrongdoing.

A succession plan is needed for staff in the PSD.

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

The force has a strategic intelligence assessment and a plan to manage threats and risks to the force.

The force needs to prepare to comply with the conditions of the College of Policing vetting code that will be introduced in 2015.

Corruption threat identification processes are effective and a strength for the force.

The anti-corruption unit is not proactive in responding to threats to the force due to high workloads and management practice within the PSD.

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

There is now an understanding by officers and staff of the boundaries between unprofessional and professional behaviour as well as obligations to declare any change in circumstances. The force has also developed an internal marketing campaign to raise awareness of risks of using social media.

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?

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

The force should ensure the PSD and the ACU have sufficient capability to take more action to prevent and tackle corruption and misconduct.

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

The force has corruption threat identification processes in place to identify vulnerable officers and staff. These processes are effective and a real strength for the force.

The force/constabulary in numbers



Complaints

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

299

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

13.6

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

15.7



Conduct

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

33

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

1.5

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

2.6



Business interests

Applications in 12 months
to March 2014

132

Approvals in 12 months
to March 2014

127



Resources

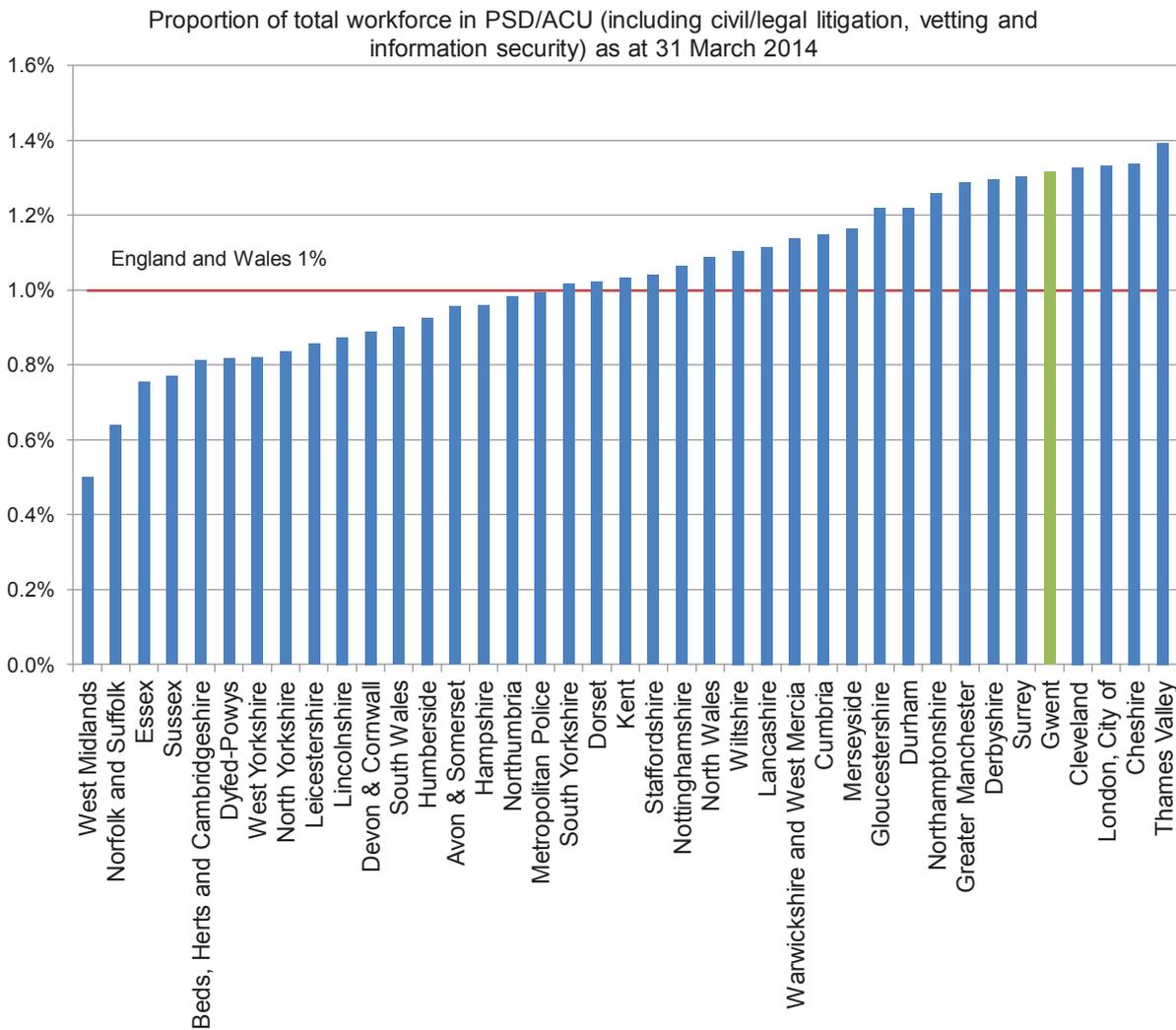
Proportion of workforce in
PSD/ACU

1.3%

Proportion of workforce in
PSD/ACU
– England and Wales

1.0%

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



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

Introduction

During HMIC's review of police relationships, published in 2011 as *Without fear or favour*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?

HMIC highlighted two areas for improvement in the 2012 inspection report:

- To centralise registers in order to monitor gifts and hospitality; and
- to ensure officers and police staff understood issues of integrity.

Good progress has been made in addressing both of these issues.

A central register for gifts and hospitality has been introduced but still the gifts and gratuities of the chief officer and senior officer teams are not audited, nor are they cross-checked with senior officers' diaries.

The force has an acceptance of gifts and hospitality policy. This policy was originally introduced in February 2005 but has not been reviewed since 2012. The force website does publish a register of gifts and hospitality provided and accepted by members of the force but this is not rank specific and only gives brief descriptions. Moreover, it does not contain details of where gifts or hospitality have been refused.

This inspection did not provide a comprehensive audit of the application of all of the policies that the force has in place.

Recommendation

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

There is extensive communication by chief officers, using a variety of methods, to deliver key messages about integrity. However, there is no mechanism in place to check that officers and staff have read and understood such messages. A recent example involved the training delivered by the PSD to first-line supervisors, which was intended to be mandatory. No details were retained of who attended. The force has a training management system which could have been used to record such information but this opportunity was missed.

Staff are aware of their responsibilities regarding integrity with the force having carried out proactive work around highlighting the risks of using social media.

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

Both the chief constable and the deputy chief constable show clear leadership on the importance of values, ethics and personal behaviour and work to ensure staff understand the risks they face. A variety of means of communication have been used to achieve this. These include the chief constable's weekly blog to the force and an online 'ask the chief' forum, where staff can ask anonymous questions to which the chief constable responds. The chief constable holds monthly 'Team Gwent' development days which all officers of inspector rank or equivalent and above are expected to attend. At these, he is able to reinforce his messages.

The force has further developed and distributed a range of posters highlighting the risks of problems with debt, steroid abuse and misuse of data. Gwent TV and Gwent Guardian, online systems, are also used to deliver key messages. However, due to the quantity of information some messages risk being lost.

Officers and police staff are aware of the boundaries between unprofessional and professional behaviour and understand how it affects both the public and their colleagues. This was reflected in the results of the recent staff opinion survey undertaken by the force. The results are encouraging and plans are in place to address areas for improvement identified and to repeat the survey.

As a result of recent inconsistencies in sanctions imposed on staff who had been convicted of drink-driving offences, the chief constable has been very clear on his expectations and about the sanctions that should be expected if similar offences are committed in the future. This message was well understood.

HMIC found that the force did not regularly conduct audits to ensure its policies took full account of national guidance that supports ethical and professional conduct; nor did the force have a programme of audits to check that staff were complying with these policies. The force should review its processes for reviewing policies and ensure a programme of ethical audits are introduced.

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.

Some, but not all, leaders – including first-line supervisors – lead by example and demonstrated their personal commitment to ethical behaviour. The force has recently

operated with a significant amount of staff on temporary promotions. This created problems with the consistency and quality of supervision. Encouragingly this has now been addressed, with a number of recent permanent promotions but insufficient time has passed to establish the difference this will make.

The force generally ensures that unethical and unprofessional behaviour is appropriately challenged. Examples were provided of inappropriate comments being made by a supervisor that were challenged by other members of staff. This resulted in a letter of apology being sent by the supervisor to the person concerned. A further example was given of an officer being suspended and then investigated as a result of a member of staff providing intelligence, the catalyst for providing this information being attendance at a workshop led by the deputy chief constable.

Gwent Police has plans to communicate and introduce the new Code of Ethics. The deputy chief constable, supported by the head of the PSD, is the lead officer on this issue and they discuss progress and plans at a monthly meeting.

Force representatives have attended seminars conducted by the College of Policing on the Code of Ethics and an ethics committee has been introduced, which explores and discusses ethical issues. This is work in progress and, as part of its preparation, the force should also explore how the Code of Ethics could be incorporated into its policies and procedures.

Officers and police staff, while aware of their responsibility to challenge and report misconduct and unprofessional behaviour, did not necessarily feel supported when they did so. Staff did not consistently say that they felt confident about challenging, although examples were given of where they had done so. There is a lack of clarity and confidence about how to challenge senior officers.

There was no evidence that senior officers routinely checked whether the force's response to wrongdoing was effective. However, the force recently held an externally facilitated focus group as part of their proactive approach to identify members of staff who may be at risk of abusing their powers for a sexual motive. This found that staff would prefer to speak with an external body, rather than use formal force procedures to report such matters.

There is a clear policy outlining the obligation to declare any change in circumstances in an officer's or police staff member's personal associations and relationships (notifiable associations policy), and officers and staff are aware of these obligations. In addition, the force business interests policy includes relevant definitions and places an obligation on staff to notify any involvement in buy-to-let properties. In these cases, the anti-corruption unit (ACU) carries out background checks on tenants to identify potential risks.

Notifications are reviewed and acted upon appropriately. Staff who have reported such associations or who have tenants who have been identified as posing a possible risk

receive a personal briefing from the ACU and a plan to minimise risk is developed where appropriate. Officers and staff are regularly reminded of their obligations under the notifiable associations policy by email.

Officers and staff have received training on the National Decision Model (NDM). It is used in some areas, notably involving the potential use of force, such as firearms command. However, in other areas it is used inconsistently. There was limited evidence that the NDM was routinely used by the PSD or the ACU. The PSD files reviewed by HMIC showed some use of the NDM as part of the severity assessment of complaints but in more complex matters there was no evidence of the NDM being used. 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.

Training on ethical and professional behaviour is given to staff but not regularly. The force has recently recruited two new intakes of student officers and gave them training that incorporated ethical and professional behaviour. The PSD has also provided training to first-line supervisors.

Although integrity training is mandatory in Gwent, no record is made on the training management system as to who has attended. Training delivery is also complicated by the fact the force does not have dedicated training time as part of the force shift pattern.

The PSD was due to run further mandatory training, in July 2014, to first-line supervisors on culture and standards but, due to poor record-keeping, ensuring all relevant people attended or received the training was difficult. Local policing area (LPA) commanders also organise development days for some of their staff, which can incorporate ethical and professional behaviour but the effect of this training could not be assessed.

Chief officers provide information to the police and crime commissioner (PCC) relating to professional standards, conduct and integrity. The chief constable and the PCC meet weekly to discuss issues. Staff from the office of the police and crime commissioner (OPCC) have dip-sampled misconduct files.

Integrity issues are monitored by chief officers at formal meetings with the head of PSD in a way that allows them to understand the issues and identify the need for action. The head of PSD chairs the quarterly meeting of the risk management and joint tasking group, with representation from the PSD, procurement, human resources (HR), information systems and data management departments present, to identify and discuss risks to the force. Updates from these meetings are reported to the deputy chief constable on a diarised basis. Quarterly meetings also take place between the deputy chief constable and the Independent Police Complaints commission (IPCC).

The force has a structure of three key strategic programme boards, each led by a chief officer: 'engaged communities' led by the chief constable; 'a service that works' led by the assistant chief constable; and 'employer of choice' led by the deputy chief constable, which is currently considering how to progress issues arising from the staff opinion survey. While these were all supported by clear plans with objectives, timescales and reporting systems, there is currently no plan directly focusing on integrity issues.

Policies and guidance clearly explain the meaning of misconduct and unprofessional behaviour and describe acceptable boundaries, and what is expected of staff in their private and professional lives.

The force's service confidence procedure provides clear definitions for staff on corruption, dishonesty and unethical behaviour. It also outlines the procedures to follow where there are integrity concerns. This policy was first implemented in 2007 and has been reviewed twice. Additionally, the force had recently introduced 'ten golden rules' for media contact that set out expectations for staff dealing with the media.

Understanding integrity

Gwent Police has recently undertaken a staff opinion survey and 68 percent of staff responded. So far the data has only been summarised and not analysed fully. However, one of the relevant findings is that there is a widespread lack of trust and suspicion of the PSD, who are seen as the disciplinary arm of the organisation, rather than as important guardians of integrity within the force. More work is required to understand these findings, which has commenced.

Details of all occasions on which officers and staff have applied for authorisation for a business interest are recorded fully in a centrally held registry, which includes details of when authority has been declined. This is regularly audited by the head of the PSD. Applications are authorised, refused, or authorised with conditions. However, rejected business interest applications are not followed up to ensure compliance with the decision, unless intelligence is received to suggest this was necessary.

In the last 12 months, the force has received 153 applications for business interests, of which five were refused. The head of the PSD has a meeting with each person whose application is refused, giving the reasons and setting out the force's expectations.

The force needs to ensure that first and second-line supervisors are formally involved in the monitoring and review of their staff's business interests and this should be extended to the review of notifiable associations and gifts and hospitality, in which they also currently have a limited role.

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

Misconduct and unprofessional behaviour

The force considers misconduct and unprofessional behaviour when making decisions in relation to applications for specialist posts and promotions. However, it was not clear that this is the case for some important training courses, including the fast-track development scheme and the strategic command course.

The force does not review how complaints are assessed, recorded, investigated and how sanctions are imposed on those facing misconduct charges, to ensure that all officers and staff, irrespective of rank or role, are treated fairly and equally.

We conducted a review of a small number of PSD cases. This included reviewing up to ten randomly selected cases involving serious misconduct or criminal conduct. The aim was to check on timeliness, supervision and appropriateness of decision-making.

We heard almost universal support for the fairness of force systems and processes. However, our review raised concerns about the record-keeping and decision-making process within the PSD. In some cases staff were allowed to resign when being investigated with potentially criminal matters regarding substantial breaches of data protection, without any evidence of advice having been sought from the Crown Prosecution Service. Thirty per cent of cases reviewed raised serious cause for concern. While some caution must be noted due to the sample size, the force should review its decision-making process in relation to misconduct matters investigated by the PSD, to ensure decisions are equitable and that appropriate action is taken in all cases.

Recommendation

Within six months, the force should publish a policy which clarifies the position on suspension, resignation and retirement of officers under disciplinary investigation.

There is one confidential mechanism by which officers and staff can report wrongdoing within the force, called Safecall. This is well marketed throughout the force with all staff with whom HMIC spoke having knowledge of it and how to report matters. However, it only receives five to ten calls per year. HMIC was not aware of any analysis as to the reasons for this apparently low reporting rate.

Staff were satisfied with the confidentiality of the initial report through Safecall. However, some staff reported they would also welcome a confidential mechanism for being updated on action taken following any information they may have provided confidentially. The head of the PSD is exploring the use of a confidential email, which might provide this facility.

Representatives from the staff associations and representative bodies would value the re-introduction of trained mentors who could provide confidential advice and support to those who do report suspected wrongdoing.

There has been a reduction in the number of intelligence referrals to the PSD over the last three years and a low number of referrals through Safecall. In addition, some staff reported that they were not sure that the climate in the force supported reporting misconduct and unprofessional behaviour. Together this indicates a lack of confidence about reporting misconduct and unprofessional behaviour by individuals or groups, although individual examples were provided where challenges had been made. Further analysis of the staff opinion survey may provide greater insight into this issue.

While officers and staff are supportive of their own supervisors, they are not so supportive of others. The force should satisfy itself that the culture within the force is one in which staff have the confidence to report misconduct and unprofessional behaviour.

Recommendation

Within six months, the force should ensure all staff understands the support mechanisms available to those individuals reporting misconduct.

The force responds to reports of wrongdoing by staff in an effective but not timely manner. The staff opinion survey identified that the PSD was perceived as remote and distant from the rest of the force. Misconduct, integrity and professional standards matters are not considered to be dealt with sufficiently quickly. As an indication, one example was given of a business interest request for which the applicant waited six months before receiving a response.

The PSD investigates all complaints received by the force, with no involvement from local managers. This provides some consistency in the approach to complaints. However, it means that local managers do not gain experience in dealing with and resolving complaints. In addition, the opportunity to use the understanding that local managers may have of any wider performance or welfare issues that affect those staff complained of, may be lost. It also leads to staff within the PSD dealing with lower level cases, which they are not well resourced to deal with, which causes delays. The ability of the PSD to focus on the investigation of the most serious instances of apparent misconduct and complaint is also reduced.

The force should review its approach to the handling of complaints and misconduct matters to ensure that local managers are competent to deal with these issues. This will allow the PSD to focus on more serious matters, as well as providing effective oversight of the whole process.

Training on the unsatisfactory performance procedures (UPP), which contains some instruction on integrity, has been rolled out by the learning and development department.

The recent training on initial police leadership development programme (IPLDP) also contains elements of integrity and behavioural training. However, integrity training is not systematic and no process for refreshing training is in place.

There is no structured process to capture and disseminate learning about integrity and professional standards. The force uses the IPCC bulletin to disseminate learning but does not encourage or collate responses to it.

The force recognises that the collection and dissemination of lessons about integrity needs to be further developed. Members of staff in the PSD are helping to re-design the force intranet site to make the professional standards elements easier to access and higher profile. This will enable more effective dissemination of learning and allow the PSD to check the number of hits the site receives from each function or department. The PSD could also monitor the number of times 'lessons learned' communications from the IPCC are viewed.

Outcomes of misconduct hearings are shared with senior management at quarterly meetings with the deputy chief constable and the chief constable publicises the outcomes of some misconduct hearings through his regular monthly blog.

Professional standards training and resourcing

All members of staff working in the PSD and the anti-corruption unit (ACU) receive some training, including the accredited national professional standards course, and they also attend further training where it is available and necessary for their role. The PSD is predominantly staffed by accredited police staff investigators who are retired police officers with a pre-existing level of expertise, competence and qualifications appropriate to their current role.

There is a balanced mix of police officers and staff working within the ACU. Regular and continuing training is necessary to ensure these staff remain abreast of best practice and new developments.

No organised succession planning takes place for the PSD and the ACU. Staff turnover is inevitable but where possible it should be phased and incoming staff trained in advance. Police officers within the PSD and the ACU are trained detectives and require professionalising investigation programme (PIP) accreditation. There would be merit in the force ensuring it has a system for identifying talent and developing this for roles within the PSD. The force should develop and implement, in conjunction with the human resources department, a system for ensuring effective succession planning for the PSD and the ACU.

The PSD is not sufficiently resourced and this situation is not improved by the fact that the PSD is responsible for investigating all complaints. The department is currently being

reviewed to identify ways of making it more efficient, with a particular emphasis on looking at the processes it employs. Although the report has been written, no recommendations have yet been made public. Adjustments to resourcing levels within the PSD have not been proposed, but the deputy chief constable is clear about the changes that he believes need to take place to free up capacity.

While the PSD and the ACU can call on other resources when necessary, the ACU is not currently able to undertake preventive operations on corruption issues, as it is heavily engaged in responding to public complaints. This gap should be considered by the force as part of its wider review of the PSD.

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 structured to promote transparency, effectiveness and efficiency. The force uses an appropriately qualified presiding officer, who is independent of the person investigated. The force has reciprocal arrangements with nearby forces in place to support this. Additionally, the force is looking to establish an independent appeal panel to hear appeals against gross misconduct findings, to promote even greater transparency.

The force makes use of fast-track dismissal where appropriate, a recent example being a drink-driving case involving a road traffic collision. The case went to appeal and then further appeal through the Police Appeals Panel. The original decision to dismiss was supported.

Quality assurance

The force audits decisions in hearings and meetings resulting from allegations of misconduct or unprofessional behaviour against officers and staff. At the end of every investigation the process is reviewed to identify any lessons to be learned.

HMIC were not satisfied that the force ensured the timeliness and quality of all investigations conducted in relation to both officers and staff. However, we recognise that the force is tackling these delays and is using the review of the PSD to improve its performance.

The newly appointed deputy chief constable, as the appropriate authority for all decisions concerning misconduct and corruption matters, has only been in post, at the time of writing, for one month but has already reviewed all suspensions and organised monthly meetings with the head of the PSD to ensure these issues are considered regularly. Representatives from the police federation are invited to these meetings.

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

Investigating corruption

The PSD takes account of the national crime agency (NCA) threat assessment and local and regional threats to develop a strategic intelligence assessment, from which a plan to manage these threats is developed and monitored.

The force has a shared arrangement, with South Wales Police and Dyfed-Powys Police, for the procurement of goods and services and contracts are also monitored through this arrangement.

The force regularly and proactively identifies vulnerable staff or groups, for instance by use of the NCA counter-corruption threat assessment and the transparency international integrity cycle (a document that gives advice to organisations, not just the police, to help tackle corruption).

Through its corruption threat assessment process, the force has identified that steroid abuse, a problem in a nearby force and identified by the NCA as a national threat, is not a significant issue in Gwent Police. The force does, however, face a risk from some staff who may be at risk of abusing their powers for a sexual motive. The force has developed a process to help identify members of staff who may fall into this group. While this process is still under development, the force may benefit from engaging with the College of Policing to evaluate its effectiveness formally.

The force has also worked with the police mutual assurance society (PMAS) to identify groups at risk from debt. As a result, a debt management policy has been implemented and there is engagement with the welfare department to help manage this risk, with key messages placed on payslips, encouraging individuals to seek help where necessary.

Additionally, the risk from use of social media sites such as Facebook and Twitter is assessed as high and the force has developed an internal marketing campaign to raise awareness of this. This campaign has included an officer who has volunteered to highlight the dangers of social media by reference to him having had a case dismissed at court because of things that he posted on Facebook before becoming an officer.

The force has recognised that it faces a significant risk from the improper disclosure of data to family and friends. Since April 2012, there have been 19 active investigations regarding improper disclosure of information.

The arrangements for identifying corruption appear to be effective and a real strength for the force.

Vetting arrangements in Gwent Police comply with the national vetting policy and identify corruption risks at the recruitment stage for officers and staff. Vetting is revisited on promotion to senior ranks and on posting to sensitive or vulnerable roles. The force has a vetting policy and an associated vetting procedures document, which outlines the steps and timescales for the process.

The latest national policy was implemented in April 2012 but the force has not reviewed its policy since 2009. The PSD is responsible for vetting and has a vetting manager in place. Senior officers are also vetted but vetting is not carried out for all promotions. There are few formal links between the ACU and the vetting section.

In 2015 a new vetting code will be produced by the College of Policing and the force will need to ensure it is prepared to comply with the conditions of that code.

The force proactively and regularly monitors force systems and social networking sites for inappropriate or unprofessional conduct by staff. Due to some issues that have previously affected the force, it takes a very guarded approach to the use of Twitter and this is tightly controlled by the media and communications department. The head of media and communications has access to technology that enables the monitoring of a wide range of social media for key words that could be linked with the force.

The force last undertook random drugs testing in 2011 and has undertaken none since because there had been no positive results. However, the deterrent effect should not be underestimated and the force needs to reintroduce testing, supported by a revised policy and the policy and results of testing should be communicated to the force.

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.

Systems and processes are in place through Tarian, the regional approach to tackling serious and organised crime, to ensure investigations are not compromised. Senior staff from the ACU attend the force meetings that prioritise the threats, harms and risks that need to be addressed and allocates resources to tackle them. The ACU liaise closely with senior investigating officers and the head of criminal investigation, in order to mitigate the risks of corruption to forthcoming operations. Senior members of staff are briefed with relevant information on a need-to-know basis.

The force has processes in place to ensure the effective security of systems, exhibits and case papers. It has an information security policy and a guidance document that sets out the requirements to ensure the effective management of information security. The document outlines the general principles of information security in order to safeguard sensitive information and to counter any potential threats. The document also sets out potential threats and vulnerabilities for staff to consider. These include the need for confidentiality and security of information, working practices that will assist in the security of information and what action should be taken if a breach of security is suspected. All papers are centralised using information security officers and an electronic records management system. No evidence was found that gave cause for concern in this area.

Intelligence

The force seeks actionable intelligence from a variety of sources, as set out in the relevant authorised professional practice from the College of Policing. A dedicated analyst works on intelligence within the PSD. We are satisfied that the force has sufficient resources to deal with the current flow of intelligence into the PSD.

Capability

The PSD and the ACU have ready access to specialist assets when required, either from within the force or from neighbouring forces (as part of the regional approach to tackling serious organised crime).

Recommendations

- **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 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 publish a policy which clarifies the position on suspension, resignation and retirement of officers under disciplinary investigation.**
- **Within six months, the force should ensure all staff understands the support mechanisms available to those individuals reporting misconduct.**
- **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.**