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# Police Integrity and Corruption

Hampshire Constabulary

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

The chief constable demonstrates strong leadership on standards and professional behaviour. Most staff know the standards expected of them, although the force needs to do more to ensure that staff understand the principles of professional behaviour and these need to be reinforced by supervisors. The force has systems in place to enable it to respond to intelligence about corruption or unprofessional behaviour. However, it needs to develop its preventive investigative work to detect and deter any internal corrupt practices.

### Summary

There is strong leadership from the chief constable and deputy chief constable (DCC) who emphasise the importance of ethical standards. Messages on ethics are communicated effectively through the force intranet and roadshow presentations. Supervisors and managers need to do more to ensure that staff understand what is expected of them, and further training on the Code of Ethics would be beneficial.

There is evidence that staff report the unprofessional behaviour of others, either to a supervisor or to the professional standards department (PSD). However, staff have only limited understanding of the support available to them should they report a colleague for misconduct. The force needs to take action to address any reluctance among staff to report wrongdoing.

The force monitors the use of force computer systems effectively and is in the process of refreshing the background checks on all its employees so that it meets national vetting requirements.

The force has up-to-date policies in respect of gifts and hospitality but there are some gaps in awareness of reporting procedures – in particular, the requirement to report offers even when they are declined. Procurement procedures ensure that joint protocols with the force's collaboration partners, Hampshire County Council and Hampshire Fire and Rescue Service, allow unfettered access to information for the purpose of being able to identify corrupt practice.

Despite significant budget reductions, the force has maintained overall staffing levels within its PSD and anti-corruption unit (ACU). Sources of potential corruption are risk assessed and there are processes in place to analyse intelligence, which the force then effectively uses to support investigations.

# The force/constabulary in numbers

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

There has been good progress against the five areas for improvement identified in the 2012 report.

New policies and procedures are in place and staff are generally aware of these policies, although the consistent recording of when a gift or hospitality is refused needs to be strengthened.

## **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 strong leadership from the chief officer team that promotes key messages.

There is a good understanding of the force's values and there are detailed plans to establish an ethics working group that will communicate the new Code of Ethics.

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

There are monitoring processes in place to identify abuse of force systems and the force has embarked on a process to refresh vetting for all employees.

Intelligence is developed and reports of misconduct are investigated, although the force needs to ensure that all members of staff understand the support they will be given should they report misconduct by others.

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

There is analysis of corruption risks and investigation in response to new intelligence.

The resources allocated for misconduct investigation are sufficient.



## Complaints

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

**939**

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

**17.1**

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

**175**

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

**3.2**

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

**2.6**



## Business interests

Applications in 12 months  
to March 2014

**222**

Approvals in 12 months  
to March 2014

**221**



## Resources

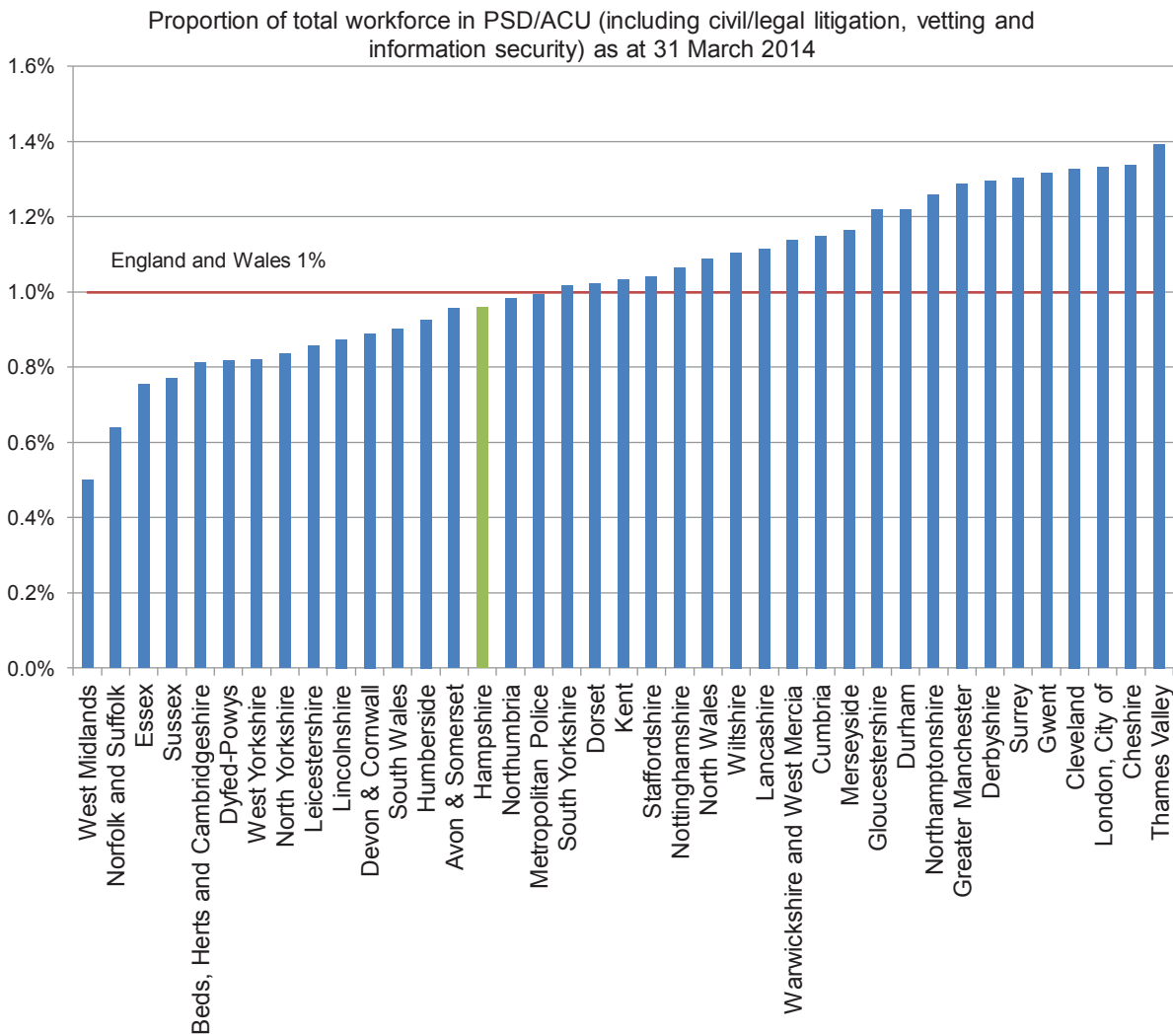
Proportion of workforce in  
PSD/ACU

**1.0%**

Proportion of workforce in  
PSD/ACU  
– England and Wales

**1.0%**

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



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



# Introduction

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

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

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

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

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

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

1 *Without fear or favour: A Review of Police Relationships*, HMIC, London, December 2011. Available from [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, London, December 2012. Available from <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, Coventry, July 2014. Available at <http://www.college.policing.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 five areas of improvement for Hampshire Constabulary from the 2012 inspection report:

- To raise staff awareness of the media policy and reporting procedures.
- To ensure that all staff are aware of the force gifts and hospitality guidance, and understand what is considered acceptable.
- To introduce procurement processes to identify staff who may be at risk of being influenced by contractors or suppliers.
- To ensure that all officers and police staff understand the changes to the second jobs and business interest policy, and know what they are required to do.
- To ensure that staff understand the changes to policies and the new integrity-related guidance.

Police staff and officers are now aware of force media policies as well as reporting procedures. The force has introduced a record system to ensure that there is an overview of day-to-day contact with media representatives.

Progress on record keeping for gifts and hospitality is good. A central register has been established that is managed within the professional standards department (PSD) and supported by electronic as well as hard-copy reporting methods. Staff are aware of the key principles of the force policy – namely, that best practice is to decline an offer of hospitality or a gift. However, staff are generally unaware that they need to report offers even when refused. Refusal entries in the central register are uncommon. Recording methods do not distinguish between gifts or hospitality declined at the time, or subsequently not approved by a manager.

HMIC found good progress in procurement practices. The force withdrew most corporate credit cards in 2014 and has entered a collaboration arrangement with Hampshire County Council and Hampshire Fire and Rescue Service to centralise and share business support functions, including procurement of supplies and services.

HMIC found that the force has made good progress in respect of its secondary employment policy. It now operates a central register administered by the anti-corruption unit (ACU), and is continuously developing guidance to inform decisions on approval for secondary occupations.

While there has not been formal Code of Ethics training, there has been progress in developing awareness of ethical dilemmas and misconduct through sessions on a variety of training courses and the chief constable's presentations attended by supervisors and managers. These presentations have made clear that supervisors have a central role in conveying and emphasising integrity issues to their staff.

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

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Staff are already well informed about the previously established CARE values (Common sense, Acting with integrity, Respect and keeping promises, learning by Experience). The force has plans to establish an ethics working group that will communicate the new Code of Ethics. The force is analysing the results of a recent staff survey and has held focus groups to explore emerging key issues that may require development.

# 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

The chief constable and deputy chief constable (DCC) demonstrate strong leadership on the standards that are expected within the force. Messages on standards and the Code of Ethics are delivered over the intranet, through articles in the force 'Reputation matters' digest and in briefings by the chief constable to senior leaders. In July 2014, the chief constable led a series of roadshow events for managers and supervisors that set out the force's expectations and emphasised the importance of supervisors' engagement with members of staff to check their understanding of standards in behaviour.

These events included a section entitled 'Ethics in action', with illustrative excerpts from officers' body-worn video camera footage. These build on an already well-established understanding of the force's CARE principles and have been effective in focusing the attention of supervisors on ethical issues.

The force has a communications strategy in place designed to promote and develop the national Code of Ethics. As part of this strategy, the chief constable emphasises his expectations and the principles of leadership, while the DCC focuses on standards of behaviour. During 2014, there were senior briefings and roadshows that managers and supervisors were required to attend, as well as regular intranet articles such as the 'Chief constable's homepage', which received as many as 2,000 'hits' per week. The approach has been effective in raising awareness among supervisors and managers (a target audience of about 1,000 people).

Hampshire Constabulary keeps staff informed about professional boundaries and the standards of behaviour required of them. The 'Reputation matters' publication by the PSD, which contains articles by the DCC and case examples, has been quoted by several staff as a source of useful reference on emerging issues and standards. This publication has recently moved from hard copy to electronic format.

The force is in the process of completing an extensive programme requiring every employee to undergo a re-vetting process. Staff generally understand other requirements, including reporting secondary occupations, their responsibilities in respect of their contact with the media and, although there are some reporting issues in this area, the general requirements in respect of gifts and hospitality.

The force has a range of policies and procedures for the use of force IT systems, including information access, information user responsibilities, removable media, home working, internet browsing and IT security. These policies are accessible and include practical guidance that serves to explain, in clear terms, the restrictions and considerations required of staff.

The information access policy, for example, is supported by 'data protection scenarios' that provide clear, practical and realistic examples of situations in which inappropriate access might occur.

The force has a range of policies setting standards for other behaviour and reporting. These include business interests and secondary employment; reportable associations; and drugs and alcohol abuse.

The gifts and hospitality policy is accompanied by clear guidance that gives practical examples of when offers are acceptable, recordable or should always be declined.

The force is committed to improving standards. Nevertheless, there is evidence that some staff have not grasped the importance of reporting consistently all offers of gifts or hospitality made to them.

Force information systems are routinely audited. Some systems are in place providing live monitoring of appropriate use and identifying inappropriate access. The anti-corruption unit (ACU) has introduced a programme of checks looking at declared business interests to verify and confirm the details provided.

Staff are aware of the force's renewed focus on ethical conduct and are generally well informed about force policies. However, the force does not routinely evaluate the effectiveness of its communications on standards and integrity.

Staff and supervisors reported that they expect to see more instances of when an individual's absence from work is challenged by colleagues or reported as unprofessional conduct for investigation. However, some supervisors are uncertain as to when such challenges are justified.

Human resources (HR) services have an important role in balancing individual medical and personal issues when dealing with individual cases of absence. However, there is also a need to identify when a challenge may be appropriate. This matter would benefit from further explanation to guide staff and their supervisors to make ethical decisions when colleagues are absent from work on the grounds of illness or for other reasons.

Although there is little evidence that staff are willing to challenge their peers directly, there is evidence of a willingness to report unprofessional behaviour either to a supervisor or directly to the PSD. Examples of staff reporting include concerns about the hours that a colleague has worked or the expenses he or she has claimed. Reports are predominantly received by the PSD by email but also through entries made on the force intelligence system, as well as the 'Confide in us' anonymous reporting link on the force intranet.

The PSD has received increased numbers of reports from staff of past occasions when they have used force information systems in a way that they now realise may fall outside policy requirements. This increase is linked to the ongoing programme of vetting. These cases have been investigated and have led, in some instances, to management action being taken to deal with individual members of staff or officers.

These are indicators that staff are willing to report inappropriate conduct of colleagues but they have only a limited understanding of the actions that the force will take to support the person making such a report. It is important that any member of staff who reports misconduct is reassured as to the support they will receive during the investigation and subsequently.

The force has processes in place to identify unprofessional use of force information systems. When misuse is suspected, an investigation follows and, when necessary, misconduct proceedings are initiated.

The force has a clearly worded 'reportable associations' policy. This policy has been revised and the guidance, published in December 2013, is available on the force website. The policy defines what is meant by an 'association' and the circumstances in which a report is required. These include cases of continuing social or other contact with persons who have criminal convictions or meet other criteria that indicate a potential risk.

Staff are aware of the requirements to report these associations and seek advice from a supervisor. Supervisors are aware of the relevant reporting mechanisms and are in a position to provide effective advice to their staff.

Reports by staff of their associations that fall under the policy are assessed by the ACU and, when appropriate, a risk management plan is put in place. All reports are responded to with a letter from the ACU and require a further report if circumstances change, or at least a yearly update.

In circumstances where the risk to the force is significant, the force can invoke the 'service confidence policy' requiring the member of staff to change their role in the organisation.

The National Decision Model (NDM) assists decision making and most officers have received NDM training; it routinely features in self-defence training, which is regularly provided to officers. Most officers also know that the NDM should be applied when making decisions about the use of force in operational situations.

The principles within the Code of Ethics have recently been incorporated into a revised template used for training course assessment. Ethical behaviour, dilemmas and the NDM, together with the CARE principles, are covered in a range of training courses, including induction courses and training for specialist and supervisor roles.

Some police staff members, however, have not received any training on the NDM and are therefore unfamiliar with its application or how it should be used in conjunction with the national Code of Ethics.

Chief officers publish their expectations on standards using leadership principles, and staff recognise the strong leadership provided by chief officers on integrity issues. The chief constable's homepage articles are read by most staff and they are aware of recent misconduct cases published in the 'Reputation matters' publication. The CARE principles are widely displayed within police buildings on posters and the force intranet.

Analysis of themes emerging from the management of integrity or misconduct issues is not reported by the force. However, the police and crime commissioner (PCC) has made complaint handling a specific measure in the monitoring of force performance. Representatives from the office of the PCC (OPCC) attend force performance meetings, which regularly consider data on complaints; when necessary, the PCC also receives briefings on significant misconduct cases and continuing investigations.

The chief officer team monitors emerging issues and the force has established a 'harm and risk board' as a mechanism to oversee integrity and misconduct matters. These quarterly board meetings are chaired by a chief officer and attended by the head of the PSD, communications and the PCC or his representative. Professional standards are a standing item at regular business meetings chaired by the DCC and attended by chief superintendents.

The DCC meets every two weeks with the head of the PSD to identify actions.

Force policies and guidance describe acceptable boundaries and explain the meaning of misconduct and unprofessional behaviour and what is expected of staff. Reviews of policies are timely and appropriate.

## Understanding integrity

In spring 2014, the force carried out a comprehensive staff survey to explore perceptions of the CARE values, fairness, respect and leadership. The force analysed the results and instigated further work, including focus groups to identify key issues and develop actions. The decision to deal transparently with the issues raised by the survey is seen as positive by staff. The roadshows for supervisors, published leadership principles and communication by chief officers are promoting cultural change.



Details of the occasions when officers and staff are offered gifts or hospitality are recorded in a central register on a system managed within the PSD. Force policy requires that gifts should normally be declined, but there is guidance providing clear examples of the types and values of gift that might be acceptable, as well as those that are not. There is a process in place to deal with requests, and any unusual cases are referred to the PSD chief inspector for a decision.

The gifts and hospitality register examined during the inspection shows a total of 347 records created in 2013. In 71 cases, the gifts had not been accepted. However, the template does not readily show the number of offers that were declined at the time and were subsequently reported as 'refused'. While there is evidence that most staff are well informed about their responsibilities to report offers that may be accepted, it is also important that any offers that are refused are reported and consistently recorded. Details of gifts and hospitality offers are published on the force website. Although not specifically dealt with as a category in the register, the force has arrangements in place for the 're-gifting' of items to a charity. These apply in circumstances where it is appropriate to accept an item on behalf of the force that would normally be refused by an individual member of staff.

## Recommendation

**Within six months, the force should ensure that all staff understand the need to report and record an offer of a gift or hospitality even when it has been refused at the time, or subsequently not approved by a manager.**

The force has a policy concerning business interests and secondary employment. This sets out the restrictions, as well as reporting and approval requirements, for all staff seeking other work, and the additional requirements for officers, including officers in the special constabulary, to report certain types of business interests of their close family members.

Each applicant's work attendance, performance and conduct are considered as part of the approval process. Applications are submitted to line managers and examined by HR and the ACU; if necessary; they are investigated to assess potential risks. Under the policy, final approval rests with the head of the PSD and renewal of each approval is required annually. In addition, the ACU has introduced a regular process to review existing approvals or applications to verify their currency and accuracy.

Restrictions may be applied when it is determined that the occupation may be unsuitable. All applicants receive a detailed explanatory letter and any appeals are routed to a chief officer.



Copies of the applications are kept by the HR department and are recorded centrally within a system managed by the ACU. This central record has been in place since 2012. It contains a total of 680 records of which 522 are active; the remainder relate to rescinded or withdrawn approvals.

Secondary employment is reviewed annually as part of the performance development review process. Routine post-event checking of 'not approved' applications takes place as part of the dip sampling of all business interests. The policy on secondary employment has been developed from national guidance, and the reporting and checking mechanisms that are in place are established and being used appropriately. In particular, the ACU's role is to consider, check and in some cases investigate applications, either when they are received or subsequently, in order to ensure integrity.

In addition to these functions, ACU investigators are also responsible for the administration of the central register, including updating renewals each April. On some occasions, when approvals have been requested for different or unusual occupations, their responsibilities may also require the proposal of new guidance or revised approval criteria.

The ACU has undertaken research to identify risks in respect of integrity issues and has established a programme of checks that are routinely carried out. The force has a number of databases, including intelligence and data tables, to help identify patterns that may indicate a concern. Although checks have been carried out for some time, there are some areas (for example, senior officers' diaries) that have not yet been included. The ACU has plans to conduct these checks every three months and they will involve a comparison with other information sources and intelligence.

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

### Misconduct and unprofessional behaviour

There are procedures to ensure misconduct and unprofessional behaviour are taken into consideration when decisions are made on promotion and officers' transfers to specialist roles, including applications for courses such as the strategic command course and the fast-track promotion scheme. For example, an application to a specialist firearms role was not approved following integrity checks and, despite being challenged, the decision was upheld.

The force has taken steps to ensure fairness in treatment across all ranks and roles. Specialist training for misconduct panel members is in place and the deputy chief constable (DCC) has specifically briefed senior officers. This means that, when there is a finding of gross misconduct at a misconduct hearing, the expected outcome will be dismissal, whatever the role or rank of the guilty party.

The DCC is routinely updated on current investigations and sanctions, including decisions to suspend staff, and maintains a record to ensure consistency. The head of the PSD further monitors decisions in all cases under investigation.

The force provides confidential reporting mechanisms for staff to report unprofessional behaviour using telephone messaging and an intranet link entitled 'Confide in us'. Anti-corruption Unit (ACU) investigators then carry out follow-up inquiries. Other sources of referral are used and include the force intelligence system, Crimestoppers, or, more frequently, email.

There is a good level of reporting of unprofessional conduct. However, HMIC found that staff lack confidence in the investigatory process and follow-up procedures. There is a perception that referrals about individual performance, which potentially affect a number of colleagues, do not always result in visible action by the PSD. This perception is reflected in the staff survey results where some staff believe that the department concentrates on minor rule infringement rather than misconduct. This perception also contributes to concerns about the support available to staff who make referrals that do lead subsequently to investigation, and the purpose and functions of the PSD are not well understood among staff. However, HMIC found that the force supports those who report misconduct, protects the referral source and seeks corroborative information. During case reviews, the PSD or a chief officer examines actions that need to be put in place to support staff involved in the investigation.

Offers of gifts and hospitality made to the chief officer team, as well as their expenses, are published on the force website. A list of the types of secondary occupations and business interests of all force employees is also published. 'Reputation matters', an internal force publication, contains case studies and information about recent misconduct cases. In response to freedom of information requests, the force also publishes data providing the number of misconduct cases it has dealt with.

The force voluntarily refers a high proportion of cases to the Independent Police Complaints Commission (IPCC). However, in a small sample of misconduct investigation files examined during the inspection, HMIC found one case that was not referred to the IPCC although it should have been because it involved an allegation of injury.

The PSD captures learning from complaints and misconduct through a dedicated role in the department. The person in post collates trends and issues, and analyses and then disseminates the lessons learned so that appropriate action may be taken in the future. The same post-holder also has responsibility for training and there is good awareness of misconduct issues among staff across the force. There is clearly scope for the force to extend this model in the work it is undertaking on the Code of Ethics and in the further development of training.

## Professional standards resourcing and training

The ACU has experienced investigators who have PSD experience as well as other training relevant to their role.

The PSD and the ACU resource levels are maintained to ensure consistency and, when vacancies within either of them are anticipated, a selection process is undertaken to ensure sufficient staffing levels are in place.

In the absence of national training, the force has devised a bespoke PSD course that has been running for over seven years. The course is held over five days and covers all the main topics to provide the skills and knowledge for officers and staff new to PSD. Hampshire Constabulary investigating officers and PSD investigators have attended as well as investigators from other forces and the IPCC.

## Quality assurance

Misconduct hearings are structured to ensure transparency, effectiveness and legitimacy. All panel members are trained and those chairing are briefed in their role by the DCC. Police staff investigators are trained, and accredited by the chief constable. In circumstances where the proposed panel chair is also a senior line manager for the person who is the subject of the hearing, the panel chair may be replaced by request. When appropriate, and in conjunction with the Crown Prosecution Service's (CPS's) consideration of evidence that may feature in criminal proceedings, the force makes use of fast-track dismissal and has done so as recently as June 2014.

The force audits decisions in hearings or misconduct meetings resulting from allegations against officers and staff. Following each hearing, a debrief takes place and the outcomes from all hearings are considered by the head of the PSD and the DCC. Within the PSD, there is a process to identify and take action on any learning points.

Ten case files were examined relating to gross misconduct. The standard of reports and case file management is generally high in terms of investigation planning, recording of decision making, rationale and appropriate supervisory oversight.

The DCC has oversight of all investigations concerning both police officers and police staff. The PSD reviews those investigations being dealt with locally or by human resources (HR) in relation to police staff, and suggests steps to ensure that they are completed in a timely fashion. There is evidence that this process is more effective in relation to investigations involving police officers, because staff associations reported concerns from their members that investigations can involve unexplained and sometimes significant delays.

There is a consistent approach to suspension, resignation or retirement during an investigation. All resignation or retirement requests can only be approved by the DCC. Force policy on the suspension of police officers under investigation has been tightened and restricted duties are used more consistently for police staff.

When officers subject to investigation retire or resign, these details are forwarded for inclusion in the College of Policing records, and references for future employment will include the nature of the investigation involved.

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

## Investigating corruption

HMIC examined how the force proactively identifies and manages threat, risk and harm from corruption. This includes the assessment of risk, action to mitigate risk and monitoring procedures in which actions are tracked and those responsible held to account.

There is a harm and risk board that meets quarterly to examine issues. The force uses the National Crime Agency (NCA) risk assessment process to identify areas of risk for follow-up by individual nominated detectives within the anti-corruption unit (ACU). For example, one area deals with the risks posed by officers who abuse their authority in forming inappropriate relationships with victims.

To improve information security, the force has increased resources so that it can check and monitor the use of force information systems. There are also processes in place to identify inappropriate contacts or other potentially unprofessional behaviour, and there are plans to extend these checks to include the examination of senior officers' diaries.

There is a comprehensive programme of in-service re-vetting of all staff and this process is expected to extend over at least three years. Staff posts and roles have been risk assessed to ensure more vulnerable roles are vetted earlier in the process. The vetting process includes checks on an individual's historic use of information systems as well as social media and other sources.

There is good investment in the resources and systems required to monitor and identify unprofessional conduct, and there are mechanisms in place to respond to and investigate such conduct when identified. This approach is effective and is supported by a weekly intelligence meeting held within the Professional Standards Department (PSD). However, the force should consider an overarching process to ensure that all corruption risks are covered with clear plans to support regular co-ordination.

The current in-service vetting programme will assist the force to identify vulnerable people (for instance, those facing significant debt). The force has already identified the need for guidance on substance abuse and alcohol risks.

Changes in the organisation have included the integration of some business functions with the county council and fire service. These changes have been well planned and there are protocols in place that require those staff who handle police procurement to be vetted. However, there is uncertainty among ACU staff concerning how the new organisation might affect their work in future, because there are staff, carrying out police procurement, who are employees of the county council. The new arrangements offer more robust processes for procurement, and there is a legal agreement to cover access to data. The force reports that there will not be any restrictions for ACU staff and access will not be inhibited.

The force actively uses random and ‘with cause’ drug testing. During 2013, 23 random tests on police officers, 12 on police staff and 1 ‘with cause’ test were carried out. The force has also used intelligence-led ‘integrity testing’ to identify risks or staff misconduct.

An operational security manager ensures effective links between serious crime investigation and the PSD or ACU. These contacts mean that measures to secure information records or target inappropriate access are used.

Systems used by the PSD and ACU are secure. The ACU is located in secure premises where both IT and physical security protection are provided. For example, property exhibits relating to misconduct investigations are bar-coded and securely stored.

## Intelligence

Processes for intelligence management are currently under review and will be aligned with the national standard authorised professional practice (APP).

The force uses the NCA threat assessment and has developed a range of systems and databases that analyse inappropriate contacts indicating unprofessional behaviour. There is a programme of routine checks and analyses, which are carried out each year or re-prioritised when there is intelligence to suggest misuse of a particular system.

A researcher uses intelligence from these systems; this is assessed and developed. An investigating officer within the ACU is allocated to progress intelligence and these processes are recorded to facilitate audits. Records of reported associations or secondary occupations are also examined and any potential issues investigated.

## Capability

There are sufficient resources to deal with the flow of intelligence received by the PSD or ACU. When there are unplanned spikes in the workload, there is the ability to increase capacity from additional resources within the force, or by arrangement with neighbouring forces through mutual aid agreements.

The PSD and ACU operate a weekly intelligence meeting, which provides a co-ordinating function. The performance of both the PSD and ACU is managed by the head of the PSD who reports directly to the deputy chief constable (DCC).

Investigating officers in misconduct cases consider the possibility of multiple suspects or offences and extend the investigation appropriately. A recent example provided by the force supported this finding.

# Recommendations

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- **Within six months, the force should ensure that all staff understand the need to report and record an offer of a gift or hospitality even when it has been refused at the time, or subsequently not approved by a manager.**