



Inspecting policing  
in the public interest

# Police Integrity and Corruption

Kent Police

November 2014

© HMIC 2014

ISBN: 978-1-78246-590-4

[www.justiceinspectrates.gov.uk/hmic](http://www.justiceinspectrates.gov.uk/hmic)





# Contents

---

To what extent has the force put in place arrangements to ensure its workforce acts with integrity?	4
The force in numbers	7
Introduction	10
What progress has the force made on managing professional and personal relationships with integrity and transparency since HMIC's December 2012 report?	11
What progress has the force made in communicating and embedding ethical and professional behaviour to all staff, including the new Code of Ethics?	12
How well does the force proactively look for, and effectively challenge and investigate misconduct and unprofessional behaviour?	16
How well does the force prevent, identify and investigate corruption?	19
Recommendations	24

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

Kent Police has a well established professional standards department including an anti-corruption unit which has a good capacity. The force has made good progress since the last HMIC inspection, embedding positive behaviour, good standards and has a clear plan for implementing the Code of Ethics. The force needs to improve how it initially assesses, then investigates, misconduct and unprofessional behaviour. There is a need to improve the way in which the force proactively reduces the risk of corruption and increases its capacity to investigate, within the strategic alliance arrangements it has with Essex Police. There is an established joint process for monitoring contracts and related issues with Essex Police.

### Summary

Kent Police has a well established professional standards department (PSD) including an anti-corruption unit (ACU) which has a good capacity. The force has made good progress since the last HMIC inspection, embedding positive behaviour, good standards and has a clear plan for implementing the Code of Ethics. The force needs to improve how it initially assesses, then investigates, misconduct and unprofessional behaviour. There is a need to improve the way in which the force proactively reduces the risk of corruption and increases its capacity to investigate, within the strategic alliance arrangements it has with Essex Police.

The chief constable and all the chief officers show strong leadership on the importance of values, ethics and personal behaviour. Policies and procedures address standards of behaviour and integrity.

HMIC found that staff are generally aware of their responsibility to challenge and report misconduct and unprofessional behaviour. There is a well understood confidential process for individuals to report wrongdoing. The force has a clear plan to implement the Code of Ethics and staff are aware of this. Training on ethical and professional behaviour is provided to staff supported by use of the force intranet and an in house magazine article. However, there is no clear way to check what staff have learned from training. The force publishes information on chief officers' expenses, gifts and hospitality, and information concerning officers' business interests and secondary employment on the force website.

---

HMIC found that there is inconsistency between the force's approach to misconduct by police officers on the one hand, and police staff on the other. Police staff are receiving significantly more serious sanctions than police officers for similar breaches of conduct. The PSD investigate all public complaints that involve gross misconduct, all other complaints are sent to inspectors on the local policing teams. There are a large number of open investigations and excessive numbers of cases held by individual investigators.

The force has a strong process for ensuring that lessons are learned from investigations. Staff are able to give examples of how they have learnt from both Independent Police Complaints Commission (IPCC) and Kent PSD investigations.

The force has an established ACU and its staff have good knowledge, skills and understanding of the organisation and systems. The ACU has an intelligence department and is supported by an analytical and research function.

The risk that operations will be compromised by corruption is managed largely within the force. Where serious organised crime is concerned, the force operates, together with Essex Police, a joint security unit within the joint serious crime directorate. This joint security unit is responsible for operational security; it also completes corruption investigations on behalf of both forces.

The level of staffing does dictate how much proactive work can be completed by the ACU.

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

One area for improvement was identified in our December 2012 report, about the need to improve the cross-referencing of procurement with the gifts and hospitality register.

Monitoring is now in place to cross-reference contract and procurement registers with the registers of gifts and hospitality and secondary employment. The IT system to track purchase orders and procurement to the point of payment is efficient and effective.

**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 officer team give clear leadership, delivering messages using a variety of means.

All staff and supervisors are prepared to challenge poor behaviour. The force has a good confidential reporting mechanism.

Ethical and professional behaviour has been incorporated into some, but not all, relevant policies and procedures, but no audits have been undertaken.

The force has good plans in place to implement the Code of Ethics.

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

The force publishes some information on its website, including information on chief officers' expenses, gifts and hospitality.

The force operates different systems for police officers and police staff when assessing, recording and investigating reports of misconduct.

The force has a large backlog of open public complaint investigations with high PSD caseloads.

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

The ACU officers and staff show good knowledge and capability.

There is access to specialist resources when required.

There is a need to improve the ACU's capacity to conduct proactive research, analysis and investigation.

The force identified drugs and alcohol misuse as one of its sixteen risk areas but needs to do further work to establish the true level of threat, risk or harm.

There is appropriate referral of cases to the IPCC.

# The force/constabulary in numbers



## Complaints

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

**1,044**

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

**19.1**

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

**296**

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

**5.4**

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

**2.6**



## Business interests

Applications in 12 months  
to March 2014

**120**

Approvals in 12 months  
to March 2014

**117**



## Resources

Proportion of workforce in  
PSD/ACU

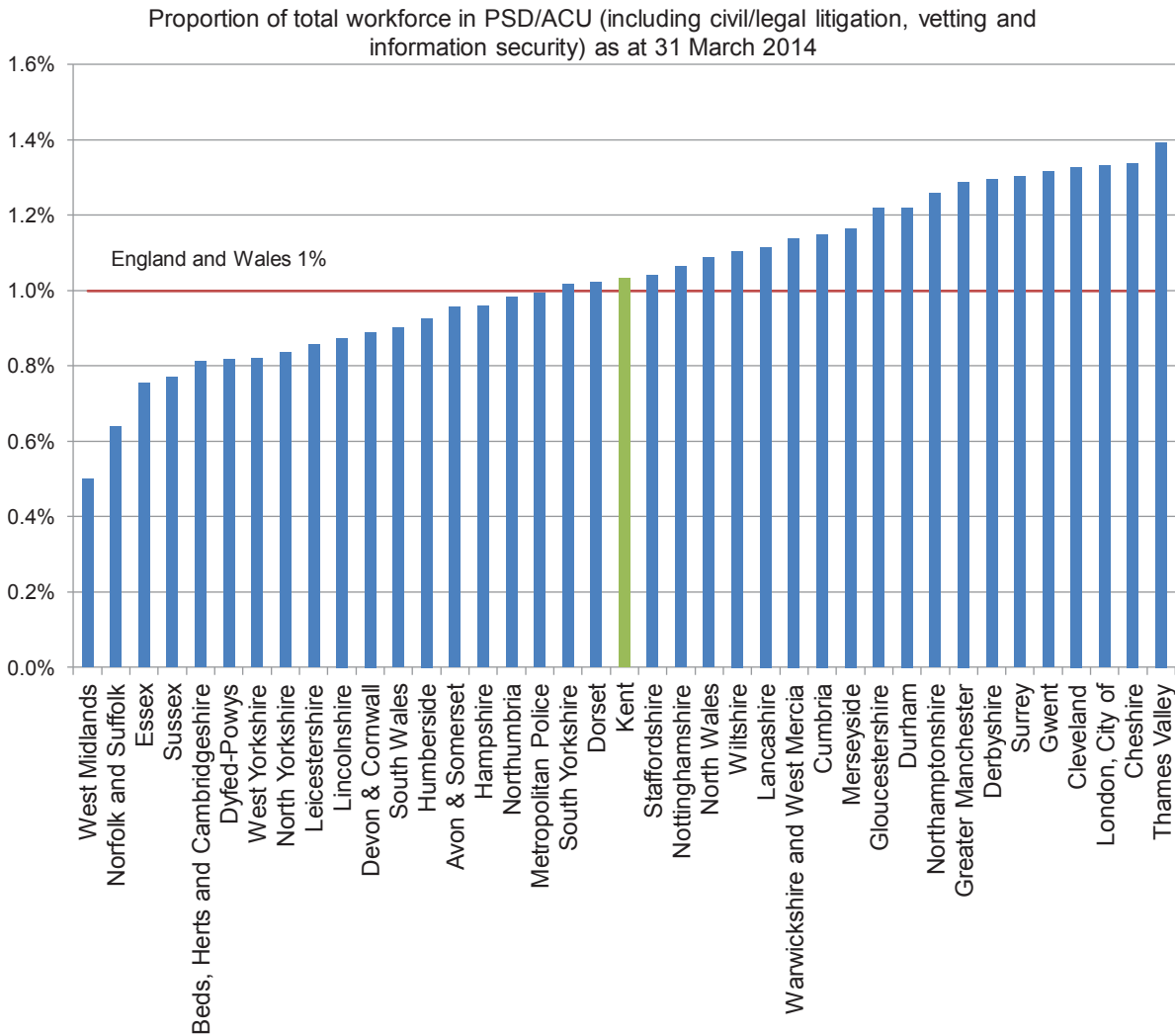
**1.0%**

Proportion of workforce in  
PSD/ACU  
– England and Wales

**1.0%**

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





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

## Introduction

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

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

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

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

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

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

1 *Without fear or favour: A review of police relationships*, HMIC, 13 December 2011. Available at [www.justiceinspectors.gov.uk/hmic/media/a-review-of-police-relationships-20111213.pdf](http://www.justiceinspectors.gov.uk/hmic/media/a-review-of-police-relationships-20111213.pdf).

2 *Revisiting police relationships: A progress report* HMIC, published 18 December 2012. Available at <http://www.justiceinspectors.gov.uk/hmic/media/revisiting-police-relationships.pdf>.

3 *Code of Ethics - A Code of Practice for the Principles and Standards of Professional Behaviour for the Policing Profession of England and Wales*, College of Policing, July 2014. Available at <http://www.college.police.uk>.

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

HMIC highlighted one area for improvement from the 2012 inspection report.

- The 2012 report recorded that the force only 'cross-referenced contract and procurement registers with the gifts and hospitality register to help ensure the integrity of the procurement process (e.g. by identifying any instances of a company providing hospitality, and then receiving a contract) if specific concerns have been identified'.

During this inspection, HMIC found the joint procurement unit with Essex Police is well established with a good understanding of the legal requirements for purchases and contracts.

HMIC also found that the appropriate registers such as gifts and hospitality, business and secondary employment have been improved and are all now searchable from one location. Monitoring is in place to cross-reference contract and procurement registers with the registers of gifts and hospitality and secondary employment. The IT system to track purchase orders and procurement to the point of payment is efficient and effective. The head of procurement is working with the training department to deliver training to appropriate police officers and police staff managers. This includes training on integrity issues.

HMIC found good links between the procurement departments and the anti-corruption unit.

Overall Kent has made good progress since 2012 in relation to this area for improvement.

# 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

Kent Police has made good progress in implementing professional behaviour across the force. There is clear leadership from the chief constable on the importance of values, ethics and personal behaviour. This is demonstrated by, for example, chief constable blogs, roadshows with staff, senior leadership events, all-out days where the chief officers go out on patrol or operations and the chief constable's chairing of the culture board. The focus is supported by all the chief officers and creates a climate of ethical behaviour and challenge.

Officers and staff are consistent in their understanding of the chief constable's expectations and they see him as a positive role model. Individuals referred to the chief constable's roadshows, the use of his blog, the 'ask the chief' process, where staff can e-mail in questions via the intranet; importantly his visibility across the force has provided them with the standards of ethical behaviour and challenge that he expects.

Individuals spoken to show a good understanding of their personal responsibilities and the way in which the force explains and provides information or training about professional behaviour. All individuals spoken to understand that their behaviour has an effect on the trust and confidence the public has in Kent Police.

Kent Police has incorporated standards of ethical and professional behaviour into some of the relevant policies and procedures, but not all. For the last year an officer has been tasked with reviewing all policies and ensuring that they are accessible on the force intranet. The force has a structured process for policy development, with identified owners of policies, and review dates. Officers and staff showed good knowledge of policies and where to find the appropriate guidance. Those interviewed stated they are clear on what is acceptable or unacceptable.

HMIC found evidence of organisational activity and change as a result of inspections by the force performance team and analysis of complaint data.

Training on ethical and professional behaviour is delivered to all staff, but not regularly, and there are no checks on levels of knowledge. The force provides training to new staff and through leadership training events. Computer-based learning training specifically related to awareness of integrity and ethical behaviour has been given. The monitoring of computer-based learning tends to be on completion rates rather than testing learning, with the force currently managing ten mandatory computer-based learning packages, plus over sixty optional packages on a wide range of subjects, including the PSD-related package.

There is a clear process to capture and record any learning and disseminate it to the force effectively. The force has developed good processes for disseminating lessons learned including those from the IPCC. The force has made use of a system called yellow orders via the intranet that provides information, direction and instruction on a wide range of topics including lessons learned. This system has a tracking facility so the force can account for the number of hits or views and managers can hold individuals to account if they have not viewed the yellow orders.

Staff use the national decision model (NDM) and most understand how it can be used in everyday situations including when solving ethical issues. However, many staff could not provide evidence of how they had been trained and, in a number of cases, did not understand themselves to be using the NDM, even though they in fact followed the process set out in that model. HMIC found clear evidence of use of the NDM as part of a range of force training programmes, including programmes for student officers, sergeants, inspectors and police community safety officers. The force is ensuring that the NDM is linked to the Code of Ethics as the need to consider values and ethics is at the centre of all decisions made using the NDM. During unannounced visits and focus groups, HMIC found good evidence and examples of supervisors promoting and encouraging positive behaviour.

Staff spoken to by HMIC consistently said they feel confident to challenge others on ethical issues and there are examples of staff making misconduct reports on managers and supervisors. Staff also believe unethical or unprofessional behaviour would be challenged by peers.

The force has plans to communicate the new Code of Ethics and to implement it. This work is led by the deputy chief constable (DCC) and managed by a chief inspector. The force has used the intranet and its in-house magazine, the Relay to promote the code. There is a good understanding by officers and staff at all levels as to what the Code of Ethics is and what it means for them. The force has established an internal ethics committee, chaired by the DCC. In addition, the police and crime commissioner (PCC) is currently recruiting members for an external ethics committee, which will hold the force to account on issues of behaviour, standards, ethics and integrity. This will complement the existing people board that is already in place.

There is a policy outlining the obligation to declare any change in circumstances in an officer's or staff member's personal associations and relationships, and officers and staff members are aware of their obligations. Notifications are reviewed and acted on appropriately. Briefing on notifiable associations is delivered to all staff, including an awareness document that the police federation and human resources have worked together to produce. Staff generally understand their responsibilities in this area and know where to go to find information.

Chief officers provide sufficient information to the PCC to enable the PCC to understand any integrity issues (including misconduct and unprofessional behaviour). The PCC now chairs the People's Board (the external ethics committee), referred to above. The office of the police and crime commissioner (OPCC) also carries out reviews of PSD complaints and conduct files.

Integrity issues (including misconduct and unprofessional behaviour) are actively monitored by chief officers at governance meetings in a way that allows them to understand the issues fully and to identify the need for action. Complaints and conduct performance information including timeliness and information such as appeals data is considered at these boards. The DCC is the appropriate authority for police officers and special constables. The head of human resources (HR) performs this function for police staff.

Kent Police have identified sixteen risk areas each owned by a senior manager such as the head of HR or the head of the PSD. HMIC found that there is an action plan with clear accountability for each strand although each risk area leader completed and accounted for the process in a slightly different way.

Issues are brought to individuals' notice by use of the intranet on a system called yellow orders or, if greater clarity is needed, in the Relay magazine. A recent example of this was an article on inappropriate and notifiable associations, which included contributions from the PSD and the local branch of the Police Federation of England and Wales.

## Understanding integrity

Details of occasions on which officers and staff are offered gifts or hospitality are recorded fully in a centrally held database (including cases where the offer was refused). This database is audited regularly by the PSD with inappropriate entries challenged or investigated. Initially the individual completes a notification on paper and this is then entered into the standalone electronic register, rather than either the PSD management system or the ACU intelligence system. Each entry is reviewed by ACU. HMIC saw examples of entries being challenged and items returned to the donator. These included tickets to a sporting event where advice was given to the officer and the line manager by the PSD. However the inspection did not provide a comprehensive audit of the application of all of the policies that the force has in place.

Details of all occasions on which officers and staff have applied for authorisation for a business interest are recorded fully in a centrally held database and included where the application was refused. However, authorised applications are not reviewed at regular intervals for renewal. HMIC found some individuals who had business interests, where cases were not reviewed for eighteen months.

---

Human resources owns the policy on secondary employment and business interests and it is the final decision-maker on all applications. HR also keeps a record of applications and decisions, passing all applications to the PSD to complete any checks, make comments, input onto the PSD system and return to HR, which is responsible for auditing the register of business interests.

The force is setting up a joint policy with PSD in Essex Police who own and manage the business interest policy. HMIC see this as an opportunity to review this policy and remove the duplication of recording applications by placing the policy and process within the PSD rather than HR, ensuring easier cross-checking of other registers and the PSD systems where required.

The force carries out limited analysis to identify trends in relation to integrity issues (including misconduct and unprofessional behaviour). The PSD have analysts who identify trends such as incivility from public complaints, and they develop problem profiles around these. Regular information is provided for local commanders to use, but it is dependent on the local commander as to what action is taken. Any issues that are of significant concern are raised with the DCC who, through the head of the PSD, ensures that action is taken.

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

### Misconduct and unprofessional behaviour

Currently the force operates two different systems for assessing misconduct. During the inspection, which included the review of files, HMIC found police staff were receiving significantly more serious sanctions than police officers for similar breaches of conduct. Staff associations and individuals interviewed as part of this inspection also considered that this was the case. While HMIC accepts that different rules and legal frameworks apply to officers and staff, HMIC's view is that these frameworks can be applied in a way that ensures fairness and equality when assessing severity of the conduct, suspension and sanction. HMIC also found that police officer conduct is correctly recorded on the Centurion system while police staff conduct is only recorded on the HR system (called SAP). The force does not therefore hold a single database for conduct and there is a risk of the PSD missing vital information or having to research an additional system when doing basic enquiries about an individual police staff member.

Misconduct and unprofessional behaviour are considered when decisions are made about transferring officers and staff to specialist roles and for promotion. The chief constable has to confirm that an applicant is suitable for courses such as the strategic command course and the fast-track development scheme. Both HR and the PSD are involved in confirming an applicant's history in the force which includes re-vetting of the person depending on the new role.

There is good knowledge of the wrongdoing policy and the different ways to report, openly or confidentially. Individuals did express concern as to how others may react to individuals reporting misconduct. The confidential reporting system is supported by a clear policy. Although some staff lack confidence in the confidentiality of the process and system, the vast majority are very positive. HMIC see this as a strength that will enable Kent Police to continue to gain actionable intelligence and carry out investigations.

The force responds to reports of wrongdoing by staff in an effective, but not timely, manner. HMIC found that the standard of investigations conducted by the PSD were good with clear supervision and direction. However, there is a significant issue in quality and timeliness of complaint investigations at a local level. There are a considerable number of outstanding open misconduct level public complaint investigations. The force and local managers recognise this as a problem that must be addressed both in the short term, and in the long term to avoid a repeat of the current position. This backlog is caused by a number of factors including a lack of knowledge, understanding and confidence by local supervisors and managers. This issue of capacity and capability needs to be rectified as a matter of urgency.



## Recommendation

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

The force publishes data and information in relation to the gifts and hospitality register, covering all officers and staff and including accepted and rejected offers; the register of business interests; the expenses of chief officers, senior officers, and police staff equivalent and the outcomes of misconduct hearings. HMIC found that the gifts and hospitality policy states that the register is published every six months, but the force website contained an annually published register of which the last publication was for 2013 and contains approximately 200 entries for officers and staff of all grades, including a number that had been declined. Business interests' registers for 2010 and 2012 were published on the force website but this does now require updating.

The force publishes expenses of current and former chief officers but not of staff below that level, and HMIC found these to be up to date.

The force does publish on its intranet results of misconduct hearings and individuals spoken to by HMIC were positive about this as they felt that it acted to counter office gossip. They also considered that it helped to clarify what was acceptable or unacceptable, and how easily things could go wrong. The force does not publish the results of criminal convictions and this may be something they would wish to progress to further enhance transparency.

The force actively uses the IPCC produced lessons learned bulletin to disseminate learning and encourages and collates responses to that bulletin. The force adheres to IPCC guidance. Identified managers follow up on lessons within their areas of policy responsibility and feed back to the PSD. HMIC found that staff were aware of the IPCC bulletin and gave evidence about how to access it. They were aware of how, for example, the force intranet is used to highlight lessons learned including those on IPCC bulletins and from force operations, incidents, investigations and PSD-related subjects. HMIC saw this as a strongly managed process with good accountability.

## Professional standards training and resourcing

Staff in the PSD, including the ACU, receive some training for their role. Generally staff are recruited with the existing level of expertise, competence and qualifications appropriate to their PSD or ACU role. The force has recognised the need to select people to fill roles within the PSD who have the right investigation skills, experience and who are recognised by their peers for their high standards of integrity. All investigators have accredited investigation training and any external requirements for specialist training are managed through training needs analysis with the force learning and development department.

Succession planning (to make sure that the right individuals are in place if someone leaves) takes place to ensure consistency in the PSD and ACU, including the selection of the head of department.

The PSD is able to be proactive in prevention. However, the volume of complaints received has increased; this is recognised by the head of the PSD and DCC who are developing a business case to address capability, capacity and management levels in the PSD. The results of the staff opinion survey in relation to the PSD provide additional evidence that supports this need. There is a need to strengthen the management in the department at the inspector level to provide resilience and support to local commanders, managers and supervisors in order to increase their ability to investigate lower level public complaints.

## Quality assurance

The new head of the PSD has introduced a matrix for decision-making on certain misconduct issues, such as inappropriate use of systems and data protection offences. This matrix only applies to police officers and special constables as police staff decisions are made by HR. This again highlights the inequality in decision-making between police officers and staff.

There is no single policy on suspension, resignation and retirement during investigations and decision-making is inconsistent. HMIC found that senior managers are confused as to whether there are policies on this for either police officers or staff. The force has the DCC as the appropriate authority for police officers but not for police staff. The force should review this arrangement to improve consistency.

## Recommendation

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

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

## Investigating corruption

The force proactively and effectively identifies and manages threat, risk, and harm from corruption. This includes the assessment of risk, proactive action to mitigate risk and monitoring procedures in which actions are tracked and action owners held to account. The PSD adopt a national intelligence model (NIM) approach to the identification and management of risk from corruption.

Both the strategic and tactical tasking and co-ordination documents shown to HMIC identified actions and owners with monitoring and follow up. HMIC also found that these processes incorporated the management of risk from all areas of the PSD including anti-corruption, misconduct and vetting.

The force proactively, but not regularly, identifies vulnerable staff or groups using the national crime agency (NCA) counter-corruption threat assessment and transparency international integrity cycle. HMIC found evidence of the ACU also making use of profiling a top 20 set of individuals at risk or a threat, through complaints, conduct, intelligence, performance and attendance. From this, a range of responses are considered including management action, performance improvement and, where appropriate, investigation. The force also has a performance improvement unit that develops officer and staff profiles that include proactivity, behaviour, history, performance development reviews (PDR) and attendance. Most of these cases are managed by local supervisors and leaders, but, if there are issues of inappropriate behaviour or conduct, these are referred to the PSD.

Vetting arrangements comply with the national vetting policy and identify corruption risks at the recruitment stage for officers and staff. The force recruitment practices clearly have good levels of vetting and there are clear processes to meet national standards for outsourced or contract staff. HMIC did not find any evidence of renewed vetting for appointments to specialist posts, but, there does appear to be a positive working relationship with the PSD, so that if there is a concern, the PSD raise this with vetting and if needed HR and/or the DCC.

The force monitors force systems and social networking sites and takes action when appropriate. The force has a web filter that monitors force systems and social networking sites for inappropriate or unprofessional conduct by staff. HMIC was provided with examples of poor behaviour, breaches of force policy and individuals inappropriately trying to take police information home to work on. The force has clear policies in place with warnings to staff as they access systems and regular reminders through the intranet and yellow orders. This is also supported by the corporate communications department providing training to employees who officially use social media for policing purposes.

HMIC found that individuals understood their personal responsibility with a good knowledge of the ability of the force to monitor emails, internet use and retrospectively look at an individual's computer use and, with authority, monitor this in live time.

HMIC were provided with examples of challenges made concerning chief officer expenses and how this was resolved by the DCC, who also circulated an intranet article on the issue, since it concerned a misunderstanding by staff rather than an integrity matter.

The force uses substance testing where there is due suspicion, or intelligence-led integrity testing, but does not conduct random drug tests to identify corruption. The force has identified drugs and alcohol as one of its sixteen risk areas. However, the force's assessment of the organisational threat, risk or harm from substance misuse by staff is based solely on the level of intelligence received in Kent. The force needs to do further work to establish what, if any, the true level of substance misuse is. One way of doing so may be through the use of random testing with published results. HMIC found that staff and support associations recognised this as a practical and worthwhile tactic.

## Recommendation

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

The force ensures that organised crime investigations are not compromised, and corruption-proofs forthcoming operations to reduce the risk of compromise. The counter-corruption procedure states that an operational security officer is employed, and reports to the head of the PSD. The role of the force's operational security officer (OPSY) is conducted by a police staff employee (Grade I). HMIC found examples of the ACU's highlighting issues and also where appropriate indoctrinating officers who sign confidentiality documents and then work with ACU to identify any corruption issues within particular investigations. Kent Police has a joint serious crime directorate (SCD) with Essex Police. Within this directorate, there is a joint operational security unit made up of a detective inspector, a detective sergeant, two detective constables and three police staff employees. These staff specifically focus on and investigate corruption risks related to serious and organised crime. There is a joint bi-weekly meeting involving this team and the PSD from both Kent and Essex to review their work. Both forces commission the unit to investigate complex or serious organised crime related cases. However, HMIC found some confusion in terms of line management. This arrangement, while appropriate in the early stages of the joint SCD, raises questions of efficiency and capacity to meet the needs of both forces.

The force ensures the effective security of systems, exhibits and case papers with clear policies and operating procedures overseen by an information security officer who is part of the PSD. The force has also recently restructured information management responsibilities and the senior information risk owner is now the chief constable's chief of staff. HMIC found the force ICT department had improved operating procedures for systems security including the use of removable devices and mobile devices. HMIC found clear systems in place for storage of exhibits and case papers. These systems are understood by staff at all levels. HMIC found a good example of where a storage and retrieval issue was identified, investigated and a wider review of processes undertaken, which led to changes in the storage of exhibits and papers.

## Intelligence

Intelligence gathered or received is analysed, graded in accordance with the authorised professional practice and developed before being actioned. HMIC found that the ACU staff completed intelligence actions in a structured way with a clear grading system. The staff have a good knowledge of force systems and all were experienced staff with a good knowledge of policing and of Kent Police as an organisation.

HMIC found that the PSD had good analytical capability, and did carry out some analysis to identify trends. However, this tended to be a reactive response to information or intelligence received. Given the level of resourcing within this function the staff cannot do any more.

HMIC found a tasking and co-ordinating process in place at which corruption issues were efficiently and effectively managed at a bi-weekly meeting held by the department. This meeting also considers issues such as complaints, conduct investigations, information security and vetting.

Actionable intelligence is acted upon and monitored through structured governance with day-to-day management by the detective sergeant in the ACU and daily oversight by the detective chief inspector. The force uses a standalone PSD intelligence system to record all incoming information and account for decisions and actions. Once the intelligence moves to an overt investigation it is recorded on the PSD management system.

The force effectively identifies multiple suspects, and multiple offences by a single suspect. Effective processes are in place. The analyst and two intelligence researchers within the department have been used to generate charts of associations and links, as well as trawling of force systems for suspects under investigation. HMIC found examples of this during reality testing, including a case where an officer was grooming female victims when attending incidents.

## Capability

The PSD and ACU have ready access to specialist assets when required. The head of the PSD and their deputy have good knowledge of investigation tactics and resources available within Kent and joint units with Essex. The force can also access regional, Metropolitan Police and National Crime Agency assets if required, and have done so. Both Essex and Kent commission the joint operational security unit to investigate complex or serious organised crime related cases. There is some confusion in terms of line management of the unit, and the arrangements, while appropriate in the early stages of the joint SCD, raise questions of efficiency and capacity to meet the needs of both forces.

The ACU has sufficient capability and capacity to take proactive steps. However, there is an acknowledgement that the proactive work of the ACU is restricted by the effect of workload levels on staff capacity. Not all intelligence can be developed due to the workload and HMIC saw examples of how the ACU assesses threat, risk or harm to manage its intelligence function and allocate 'packages' for investigation to others such as the joint security unit for SCD. There is a clear acknowledgement by staff that they would like to do more, but staff accept that staffing levels have to be proportionate to the demands elsewhere in the force. HMIC found that the accommodation the ACU were housed in (a converted former police house) was cramped, and only just able to meet the needs of the staff currently working in the ACU.

## Recommendation

**Within six months, the force should review and confirm the line management arrangements of the joint operational security unit and should, as far as is economically viable, ensure there is sufficient proactive capacity to prevent, identify and investigate corruption.**

The performance of the PSD and ACU is regularly monitored by the force and includes the timeliness and quality of handling complaints, investigations, decision-making, outcomes and appeals. On a day-to-day basis the head of department and her deputy are responsible for management. The head of department also has a regular departmental management meeting and a bi-weekly meeting with the DCC, at which actions are recorded and accounted for in the head of department's day book. At a force level management information is provided by the analyst and any actions are recorded and accounted for at the force performance meetings.

---

The head of corruption has a clear and direct reporting line to the DCC as the chief officer lead and appropriate authority for police officers and all cases involving criminal acts.

The force ensures that lessons are learned and effectively disseminated to officers and staff with a clear process that includes follow up by the PSD and, where appropriate, holding managers to account. HMIC saw good examples of the process on the PSD portal of the force website, yellow orders and as part of the material in the chief officer blogs and emails.

Cases are appropriately referred to the IPCC in accordance with the statutory guidance and the file review completed by HMIC found evidence of this.

## Recommendations

---

- **Within six months, the force should ensure it has sufficient capability and capacity to enable the timely and proportionate investigations into public complaints.**
- **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 it has a policy on substance misuse and drug testing to identify and deter substance misuse. The force should communicate this to all staff.**
- **Within six months, the force should review and confirm the line management arrangements of the joint operational security unit and should, as far as is economically viable, ensure there is sufficient proactive capacity to prevent, identify and investigate corruption.**