



Inspecting policing
in the **public interest**

Police Integrity and Corruption

Lincolnshire Police

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

Lincolnshire Police has made excellent progress in reinforcing ethical and professional behaviour across the force. Both the chief constable and deputy chief constable (DCC) show clear leadership and emphasise the importance of ethical standards. All staff know the standards expected of them and the force has plans to integrate its existing values with the new Code of Ethics. The force has systems in place to enable it to respond to intelligence about corruption or unprofessional behaviour although it is limited in its ability to be more proactive. Information security is a key strength for the force and the force demonstrates the highest levels of information security. However, it needs to develop its existing checking mechanisms when gifts and hospitality are declined and business interest applications are withdrawn.

Summary

Lincolnshire Police has made excellent progress in reinforcing ethical and professional behaviour across the force. Both the chief constable and deputy chief constable (DCC) show clear leadership and emphasise the importance of ethical standards. All staff know the standards expected of them and the force has plans to integrate its existing values with the new Code of Ethics. The force has systems in place to enable it to respond to intelligence about corruption or unprofessional behaviour although it is limited in its ability to be more proactive. Information security is a key strength for the force and the force demonstrates the highest levels of information security. However, it needs to develop its existing checking mechanisms when gifts and hospitality are declined and business interest applications are withdrawn.

Staff are knowledgeable on well established 'PRIDE' values (Professionalism, Respect, Integrity, Dedication and Empathy), which are embedded in force behaviours and the positive 'way things are done' in the force. There is clear leadership from the chief constable to create a climate of ethical behaviour.

Lincolnshire Police makes extensive use of e-learning packages, supplemented by force newsletters and televised recordings to spread important messages. There is scope to more effectively publicise the results of disciplinary meetings and misconduct hearings, as well as publishing the results of drugs and alcohol tests which would further support the forces' stance on professional standards.

The DCC leads on professional standards and is seen as accessible and approachable by staff and staff associations. There are good governance arrangements in place and information is shared with the police and crime commissioner to enable him to effectively scrutinise force performance.

There is evidence that staff report unprofessional behaviour of others, either to a supervisor or to the professional standards department (PSD) and they feel supported in doing so.

The force demonstrates the highest levels of information security. In addition, the vetting unit is robust and performs effectively. The force does make use of random and 'with cause' drugs and alcohol testing and carries out integrity testing to good effect.

Due to significant budget reductions the force has reduced overall staffing levels within its PSD and the anti-corruption unit (ACU). Sources of potential corruption are effectively risk assessed and there are processes in place to analyse intelligence, which it then effectively uses to support investigations. Nevertheless, the ACU needs to be more proactive in overseeing and directing investigations, which prevent and deter corrupt practices. The force is not able to proactively monitor its force systems or social media sites, although it is planning to implement software to enable this soon.

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 (AFIs) in the December 2012 report.

Good progress has been made in relation to gifts and hospitality, notifiable associations and anti-corruption policies. These have been reviewed and disseminated through e-learning.

Some work has been undertaken to improve monitoring processes in relation to procurement and the gifts and hospitality register but a greater focus is still required to ensure appropriate levels of intrusiveness.

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

There is clear leadership from the chief officer team to create a climate of ethical behaviour and challenge.

The force has a well-established code of values called PRIDE, and there is a clear plan to progress the integration of these values with the Code of Ethics.

There is robust governance of the work of the Professional standards department (PSD) and anti-corruption unit (ACU) by the DCC and oversight by the police and crime commissioner.

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

The confidential reporting system is a useful tool and reports of wrongdoing by staff are responded to in an effective and timely manner.

The force does not publish its gifts and hospitality register and the business interests and secondary occupations register is not up to date.

The force conducts random and ‘with cause’ drugs testing including those who are about to join the organisation as officers and PCSOs.

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

The national threat assessment is incorporated into the ACU’s priorities.

There is evidence of the national intelligence model (NIM) governance arrangements, although there were some gaps identified.

The ACU staff have the right skills and experience to analyse, develop and investigate, but it has limited proactive capacity.

There is neither proactive monitoring of force systems nor monitoring of social media sites, although the force is planning to develop this capability.

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

What progress has the 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?

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

There is limited analytical capability to identify trends in relation to integrity issues.

All staff, irrespective of rank or role are treated fairly and equally in terms of how investigations are investigated.

The force/constabulary in numbers



Complaints

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

448

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

30.3

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

15.7



Conduct

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

41

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

2.8

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

2.6



Business interests

Applications in 12 months
to March 2014

133

Approvals in 12 months
to March 2014

132



Resources

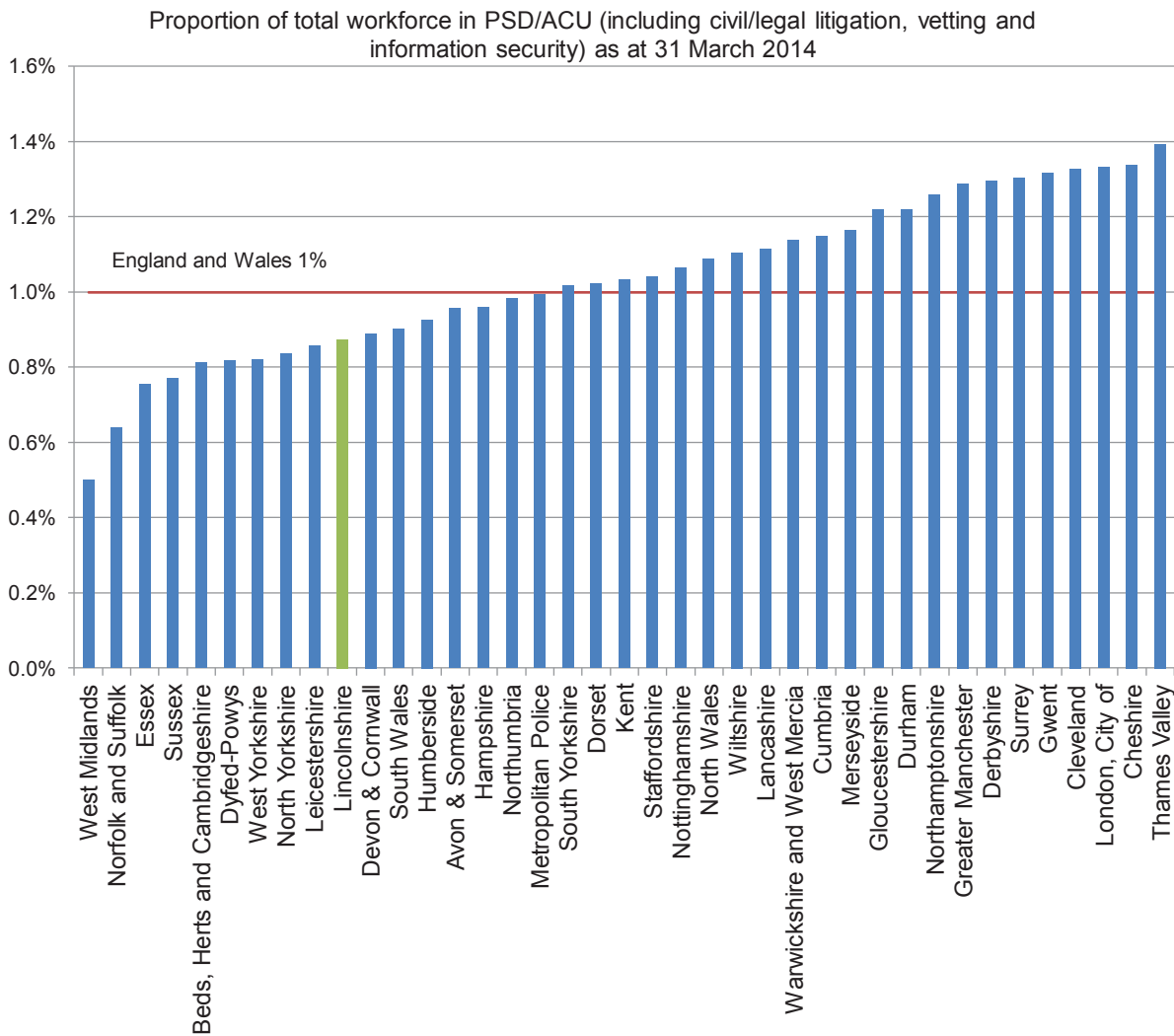
Proportion of workforce in
PSD/ACU

0.9%

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 found that the force has made good progress since 2012. Two areas for improvement (AFI) were highlighted for Lincolnshire Police:

- (1) review existing policies on: gifts and hospitality; anti-corruption and notifiable associations; and
- (2) improve monitoring processes between contract and procurement registers with the gifts and hospitality register.

On the first area, the force had intended to communicate key messages through chief officer presentations, however, this has since been replaced with an e-learning package called 'Counter Corruption' which covers the areas identified for improvement and includes, for example, substance misuse, debt, business interests and abuse of authority. This e-training has been identified as good practice by the National Crime Agency (NCA). Regular reminders are provided through weekly force orders to keep these issues at the forefront and there is close scrutiny by the professional standards department (PSD). Good progress has been made with this area for improvement.

On the second area for improvement, supervisors from both procurement and anti-corruption have access to senior officers' diaries but there is limited cross checking with procurement decisions. This is recognised as an area still to improve and the head of procurement is currently updating processes to provide greater oversight and monitoring of contract and procurement registers. Limited progress has been made with 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

Lincolnshire Police has made excellent progress in reinforcing ethical and professional behaviour across the force. Both the chief constable and deputy chief constable (DCC) show clear leadership and emphasise the importance of ethical standards. Messages on ethics are communicated effectively through the force intranet and 'road show' presentations, the most recent on the importance of integrity in crime recording.

Staff are knowledgeable about well established 'PRIDE' values (Professionalism, Respect, Integrity, Dedication and Empathy), which are embedded in force behaviours and the positive way 'things are done' in the force. The chief officer team actively promote these values and this approach is supported by a poster campaign and frequent messages in force orders. Chief officers have introduced PolTube (video briefings) as a means of getting messages out to a geographically dispersed workforce, although at the time of inspection the forces' IT capability did not always enable the effective streaming of PolTube.

Police officers and staff have a good understanding of the boundaries between unprofessional and professional behaviour and fully understand how it affects both the public and their colleagues. Staff have received advice and guidance from the PSD at induction, through e-learning and other training days.

Lincolnshire Police keeps staff informed on professional boundaries and the standards of behaviour required of them. '*The Standard*', a quarterly publication produced by the PSD, contains articles by the head of the PSD, and case examples and was quoted by several staff as a source of useful reference on emerging issues and standards. This publication could be further enhanced by including the results of meetings and misconduct hearings as well as publishing the results of the drugs and alcohol tests which the force carries out.

Ethical and professional behaviour has been incorporated into most policies and procedures. The force has a rolling programme to review them as they become due. This ensures they will all reflect required ethical and professional standards.

The DCC leads on professional standards including integrity and corruption. The senior team are seen as accessible and approachable by staff associations and respond to concerns positively. The DCC meets regularly with the head of the PSD, although these meetings could be broadened to include human resources (HR) and staff association representatives where appropriate.

Leaders, including first line supervisors, lead by example and demonstrate, promote and encourage ethical behaviour. They check the understanding of their staff as to what is expected of them in both their professional and private lives. Staff understand what supervisors expect of them and are of the view that supervisors will challenge wrongdoing where they see it. The force has in place a 'Staff Charter' and 'Leadership Charter' which emphasise expected standards and behaviours. Staff also explained that the force is relatively small and this leads towards a more family-like atmosphere. This might mitigate formal action being taken against members of staff, however, there is good evidence to show that unethical and unprofessional behaviour is being appropriately challenged within the force. Many examples were provided to demonstrate that this is happening, for example, thorough investigations into public complaints and investigations carried out by the ACU.

The force has established an ethics working group that communicates the new Code of Ethics and there is a plan, with action owners, to bring together both PRIDE values and the code in a way which is meaningful for officers and staff. Lincolnshire Police has outsourced some of its functions to a private sector partner who has its own policies and procedures. The force is working with its industry partner to ensure the code is established and meaningful across both organisations.

There is a culture of challenge within the force and members of staff are aware of their responsibility to challenge and report misconduct or unprofessional behaviour. The force has a 'Bad Apple' confidential reporting line and whistle blowing policy and staff reported they felt supported to challenge irrespective of rank, role or experience. Support is tailored to individual needs and the PSD applies an approach similar to witness care. Once the investigation has reached an appropriate stage then local supervisors are briefed making it clear that those who reported their concerns have done the right thing.

There is a sound policy to declare any change in circumstances in police officer or staff member personal associations and relationships. Briefing on notifiable associations is delivered to all staff on joining the service while e-learning has been used for the existing workforce. Generally officers and staff members are aware of their obligations. Notifications are reviewed and acted on appropriately and each one is graded and action taken by the PSD.

The force has a range of policies setting standards for other behaviour and reporting, which includes: business interests and secondary employment; reportable associations; and drugs and alcohol abuse. However, HMIC found gaps in the publication of the business interests register which is dated 2009 and the gifts and hospitality register is only available through a Freedom of Information Act request.

The National Decision Model (NDM) is in use in the force, is part of the police promotion process, and is incorporated into all firearms and public order training. Most officers know that the NDM should be applied when making decisions about the use of force although some police staff members have not received any training about the NDM and consequently are unfamiliar with its application or how it should be used in conjunction with the national Code of Ethics.

Training on ethical and professional behaviour has been provided to all staff through an e-learning package and the force is able to audit who has completed it. Staff, including those involved in learning and development, do not consider e-learning as a suitable approach to understanding subjective subject matter such as integrity and would prefer face-to-face training with discussion of these aspects.

Leadership by chief officers on integrity issues (including misconduct and unprofessional behaviour) is clear, visible and recognised by staff. *'The Standard'* includes reminders for staff about their responsibilities and obligations in relation to integrity and the reporting of wrongdoing, alongside advice and guidance on conduct, for example on social media and the disclosure of information.

The police and crime commissioner (PCC) has complaint handling as a specific measure as part of monitoring force performance. Representatives from the office of the PCC (OPCC) attend force performance meetings, which regularly consider data on complaints and where necessary, the PCC receives briefings on significant misconduct cases and continuing investigations. This provides sufficient information for the PCC to enable him to effectively scrutinise the force. The head of PSD also meets bi-monthly with a representative from the OPCC.

The DCC holds monthly meetings with the head of the PSD and ACU to identify actions and monitors the confidential risk register, which contains covert investigations. The DCC receives detailed updates on operations and is available to the head of the PSD on a more frequent basis if required.

Policies and guidance clearly explain the meaning of misconduct and unprofessional behaviour and describe acceptable boundaries of conduct and what is expected of staff in their private and professional lives. Policies are stored on the force intranet with many also published on the force website. The force has a process in place to review policies at a quarterly risk management meeting where policies coming up for review are identified and discussed with the relevant head of department. Each policy has a publication and review date and staff know how to access these policies. The majority of policies checked by HMIC were found to be up to date.

Understanding integrity

The force has conducted some limited survey work to establish an understanding within the workforce on how integrity issues affect public trust, for example a health and well-being survey of staff. The PCC also conducts public survey work and there are formal surveys of victims of crime. With the launch of the Code of Ethics, further work would have the benefit of identifying the levels of understanding within the force as well as identifying training needs.

Details of the occasions on which 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 and recorded and there is guidance providing clear examples of the types and values of gift that might be acceptable as well as those which are not. Staff are either unclear or unaware of the need to record those gifts which have been declined and currently only chief officers register the declining of gifts and hospitality. Entries are monitored and challenged or investigated. HMIC saw examples of audit and challenge and appropriate action is taken in the case of inappropriate acceptance, for example where it concerned alcohol and football tickets.

The force does not publish details of the gifts and hospitality register and will only provide information on it in response to a Freedom of Information Act request.

Within six months the force should ensure that it has communicated to all staff the requirements to comply with policies relating to gifts and hospitality even when they are declined.

All occasions where officers and staff have applied for authorisation for secondary employment, membership of an organisation or a business interest are recorded in full by the force in a central database in the ACU which is regularly reviewed to ensure that all of these remain acceptable. The decision to accept or reject an application is made by the head of the ACU. There is no follow up with those who have had an application declined. Similarly, there is no formal process in place where staff withdraw an application before it reaches the ACU to check to ensure that they had not taken the business activity anyway. Withdrawals (as opposed to refusals) are not formally recorded on any ACU register to allow for formal ongoing checking.

Recommendation

Within six months, the force should introduce a process to ensure that any secondary employment or business interest applications which have been declined or withdrawn are followed up on to ensure compliance.

The force carries out some analysis to identify trends in relation to integrity issues and senior officers are aware of the need to monitor offers when awarding contracts. Work is progressing to put in place a more robust method of monitoring senior officer diaries and procurement processes. Governance meetings are used to discuss trends and plan appropriate approaches and this often involves reminder messages through '*The Standard*' and on force orders.

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

Misconduct and unprofessional behaviour

Misconduct and unprofessional behaviour are considered in the decision-making process when there are applications for courses such as the senior police national assessment centre (SPNAC), the fast track development scheme, the transfer of officers to specialist roles and the promotion of officers for some, but not all, positions. The ACU provides any intelligence for promotion processes and there is a formal vetting process for high risk specialist roles but the force has a number of temporary promoted ranks where vetting is not routinely completed.

The force ensures that all staff, irrespective of rank or role, are treated fairly and equally in terms of how investigations are assessed, recorded and investigated and how sanctions are imposed.

There is a clear policy for reporting wrongdoing. The force uses 'Bad Apple', an encrypted confidential reporting system. There were 190 referrals through the system between March and July 2014. This appears a high figure, however, the head of PSD explained that the system is sometimes used by disgruntled staff reporting issues which relate to poor performance or workplace disputes rather than wrongdoing and which are referred to line management. Staff know the policy and the 'Bad Apple' process and were generally confident in reporting wrongdoing and using the reporting line.

The PSD is able to respond to reports of wrongdoing by staff in an effective and timely manner through an adequately resourced and experienced team. This was evidenced by positive feedback from staff regarding timeliness, however, there is limited performance data within the department with which to monitor and manage investigations. This is particularly in relation to complaint enquiries and members of staff and staff associations often feel that the process takes too long and is sometimes stressful.

Cases are being appropriately referred to the Independent Police Complaint Commission (IPCC) and the IPCC Commissioner is available, as well as the PCC, to discuss misconduct issues and other related matters.

'*The Standard*' is an informative newsletter and is widely read amongst officers and staff. The contents include information from IPCC bulletins and local issues, and it is intended to educate staff on the adverse consequences of wrongdoing and unprofessional behaviour. However, the force does not publish the results of misconduct meetings, hearings or the outcomes from random and 'with cause' drug testing. This is an opportunity missed to demonstrate to the workforce positive action being taken and how the force supports high professional standards.

Professional standards training and resourcing

There have been significant budget reductions in the force and although there are experienced officers and staff in the PSD and ACU, numbers are reduced. The force is strong in ensuring that staff and officers receive regular training for their role and there is considerable expertise and experience with all investigators being PIP (professionalising the investigative process) Level Two trained, and senior investigators as PIP Level Three and Level Four trained. Sources of potential corruption are effectively risk assessed and there are processes in place to analyse intelligence, which it then uses effectively to support investigations. HMIC were provided with examples where upon receipt of intelligence, the force has been able to mount effective integrity testing and other covert operations using resources from outside the county. Nevertheless, there is limited analytical capability and the ACU could be more proactive in overseeing and directing investigations which prevent and deter corrupt practices.

Succession planning (to make sure that the right staff are in place if someone leaves) generally takes place although staff turnover is low and most staff have worked in the department for a long time, which provides stability. The current head of the PSD, although newly appointed, is a very experienced senior detective who has recently returned from working at the East Midlands Special Operations Unit (EMSOU).

Only one gross misconduct case has been heard in the last 18 months, however, HMIC is satisfied that misconduct hearings are structured so as to ensure transparency, effectiveness, efficiency and legitimacy. Hearings and panels are conducted in line with police (conduct) regulations. No issues were raised by any staff associations who attended hearings to represent their members. When there are issues regarding the independence of the presiding officer, the force is able to use senior officers from other forces in the region.

The PCC is currently recruiting independent members for the panels to further ensure transparency and this process is being conducted in isolation from the force to ensure the independence of those selected. The force has made use of fast-track dismissal in the past and the DCC lead on professional standards indicates that it would do so again if circumstances were appropriate.

Quality assurance

The force does not regularly audit decisions made in hearings or meetings which consider allegations of misconduct or unprofessional behaviour against officers and staff. The Police Appeals Tribunal is relied upon to quality assure decisions and process. Regular audits do not take place to ensure that investigations are justifiable and proportionate although cases are discussed between the DCC and the head of the PSD. The OPCC also conducts dip sampling, while tasking meetings within the PSD are also used to review.

The PSD do not conduct all the integrity and misconduct investigations. Some are being carried out by police inspectors based on the two command areas. Inspectors have other operational responsibilities and although there is limited data on the timeliness of these investigations it is reported that they can be protracted. Although 28 day reminders are sent out, HMIC was told of investigations taking too long. The quality of investigation is robustly assured through regular meetings between the DCC and the head of PSD where cases are discussed, and steps taken to ensure the cases are being correctly handled; being addressed at the right level; and escalated or de-escalated appropriately. This assurance process was confirmed by HMIC through file reviews.

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.

Where officers retire or resign, these details are forwarded for inclusion on the College of Policing 'disapproved officer register'⁴.

⁴ This is a national register of officers that had been dismissed for gross misconduct including those electing to resign or who retire in the face of gross misconduct, held by the College of Policing.

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

Corruption investigation

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

The force uses the National Crime Agency (NCA) risk assessment process to identify areas of risk and there is a force control strategy for anti-corruption. The force assesses any emerging issues and trends together with intelligence from a range of sources and these are discussed at the monthly DCC meeting. Actions are agreed and tracked.

The force is starting to proactively identify vulnerable staff and groups by using the NCA counter-corruption threat assessment. The force has started with an analysis of complaint data and is bringing together information from across different functions, for example, officer performance and sickness data to build a better picture to identify patterns at an earlier stage.

The force collaborates regionally in relation to providing staff to the East Midlands Special Operations Unit (EMSOU). There are protocols in place for reactive investigations but no process for proactive work by the Lincolnshire ACU in respect of Lincolnshire staff posted to the EMSOU. There is also an issue where staff from more than one force might be involved in the same disciplinary investigation and subject to differing force policies while being investigated and so may be treated differently. The head of the PSD is aware of this issue, especially as he has recently transferred from this unit. HMIC considers that these identified issues be addressed regionally.

Recommendation

Within six months, the force should work with the EMSOU to ensure that there are proactive counter-corruption processes in respect of all staff posted to the EMSOU.

Vetting arrangements comply with the ACPO (Association of Chief Police Officers) national vetting policy and are designed to identify corruption risks at the recruitment stage for officers and staff. Although vetting is carried out by the information management unit it has good links with the PSD and works closely with the ACU. There are different levels of vetting which reflect the nature of the role. Vetting is carried out again on promotion or on posting to sensitive or vulnerable roles. However, there are potential gaps in the system where considerable reliance is placed upon temporary promotions that may not have been through this process.

The force does not yet proactively monitor force systems and social networking sites. Instead, it monitors social networking sites on a 'with cause' basis, and is investing in

social networking monitoring equipment which should be online by August 2014. This will enable the force to proactively monitor staff use of the internet and force systems. Staff are frequently reminded of the dangers of personal information on social media as well as their responsibilities to use social media sensibly.

The procurement department carry out checking of corporate credit cards and contract awards to ensure that there are checks and balances in the procurement process. An officer in the ACU conducts regular audits of senior officer diaries against the gifts and hospitality register. It is acknowledged that this audit process could be more intrusive, and this is an area recognised by the force.

Within six months the force should ensure it carries out regular audits of integrity related registers including gifts and hospitality, expense claims, procurements activity and other records.

The force uses random as well as 'with cause' drug and alcohol testing. It screens potential police officer and police community support officer (PCSO) recruits at an early stage in their recruitment phase. The force carries out random drugs tests aiming to test five percent of the workforce every year. The force uses intelligence-led integrity testing often using undercover officers from another force. However, the force does not publish results on any of these tests.

The force ensures that organised crime investigations and operations are not compromised by corruption. The head of the ACU also carries out the role of force operations security officer assisting in preserving information security in relation to covert investigations and assessing whether people are attempting to compromise investigations. IT systems are designed to protect operations, with an ACU team member attending meetings with investigation units and they also attend the EMSOU meetings to be informed of ongoing activity, and if required additional local measures are put in place to increase operational security.

The force has strong processes to ensure the effective security of systems, exhibits and case papers. The force has an information security policy and through a proactive information security unit ensures the effective management of information security. The force complies with management of police information (MOPI) requirements and standards.

Intelligence

The force proactively and regularly gathers actionable intelligence on corruption and grades it in compliance with the relevant Authorised Professional Practice (APP). However, due to limited analytical capability the amount of proactive work the force is able to engage in is less than would be expected and there are gaps in compliance with the national intelligence

model process, for example, there is no collection strategy to support the strategic assessment. However, there are sufficient resources to deal with the flow of intelligence and act upon it. An example was provided demonstrating that the force carried out successful integrity testing, with the assistance of the EMSOU and another force.

The PSD and ACU tasking arrangements ensure that lines of information and intelligence from different sources are cross-referenced and where corruption issues are considered, recorded, actioned and reviewed. Actions from previous meetings are brought forward and logs show a process of checking lines of enquiry, investigation plans and review by a relevant senior investigating officer.

The PSD has both the capacity and capability to effectively identify multiple suspects and multiple offences by a single suspect. Examples from reality testing and file reviews were found during the inspection indicating thorough development of intelligence and investigations.

The force's approach to allocating intelligence is sufficient most of the time but with limited analytical capability this means it is not as proactive as it could be.

Capability

Given current budgetary constraints the ACU, sometimes has insufficient capability and capacity to provide a proactive element. However, it has ready access to specialist resources when required including undercover officers from other forces, technical equipment and other specialist skills as part of its collaboration within the EMSOU.

The performance of the PSD and ACU is regularly monitored by the DCC through monthly meetings. The head of the PSD, who is also responsible for the ACU, has a clear and direct reporting line to the DCC. There is also scrutiny by the PCC, which includes dip sampling of misconduct files. The force has the IT systems in place to allow for allocated complaints, investigations and actions to be effectively monitored and managed, but a greater performance focus within the PSD would generate further improvements.

The force ensures that lessons are learned and effectively disseminates these to officers and staff through '*The Standard*' and reinforces them through repeated reminder messages in force orders. File checking by HMIC indicated that cases are being appropriately referred to the IPCC in accordance with the statutory guidance.

Recommendations

- **Within six months, the force should introduce a process to ensure that any secondary employment or business interest applications which have been declined or withdrawn are followed up on to ensure compliance.**
- **Within six months, the force should work with the EMSOU to ensure that there are proactive counter-corruption processes in respect of all staff posted to the EMSOU.**