



Inspecting policing  
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# Police Integrity and Corruption

Metropolitan Police Service

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

The Metropolitan Police Service (MPS) has made satisfactory progress in implementing measures to promote and instil ethical and professional behaviour. There is clear leadership from the commissioner and the chief officers and much is being done by the force to make staff aware of what is required. However, HMIC found that the message was not always clearly understood. The MPS is not dealing with unprofessional behaviour and misconduct consistently well; there was a lack of understanding by supervisors and different practices dependant on location. However, the force has excellent capability to identify corruption and those at risk of being corrupted; and proactively monitors staff activity.

### Summary

The MPS has made satisfactory progress in implementing measures to promote and instil ethical and professional behaviour. There is clear leadership from the commissioner and all of the chief officers and much is being done by the force to make staff aware of what is required. However, HMIC found that the message was not always clearly understood.

The force is not dealing with unprofessional behaviour and misconduct consistently well. We found that a lack of understanding by supervisors and different practices dependant on location were the cause for this. For gross misconduct cases, consistency is achieved through management by trained senior officers and in the majority of hearings the use of the same chairperson.

The MPS has excellent capability to identify corruption and those at risk of being corrupted. The force has adequate dedicated resource within its anti-corruption unit (ACU) to investigate cases and develop intelligence and to protect the operational security of investigations of organised crime groups.

The force proactively monitors staff activity. HMIC found examples of integrity audits; random drug testing; checks of use of IT systems and social media to identify cases of misconduct and indications of corruption.

HMIC found there has been good progress on the four areas for improvement identified in our 2012 HMIC inspection.

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

There were four areas for improvement identified in our 2012 report.

Clearer guidance on staff relationships with media as part of the force's communications strategy has been issued.

A central register of media contact is published on the force website and media stories monitored to identify possible leaks from force staff.

**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 commissioner, supported by all chief officers. Messages are delivered using a variety of means including face-to-face briefings, training and internet question and answer sessions.

Staff are prepared to challenge and report wrongdoing.

Policies and procedures setting out the boundaries of ethical and professional behaviour are in place.

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

Promotion and selection processes are effectively monitored.

There are locally-based professional standards champions who support misconduct and complaint investigations, but there are different practices operating.

There was a lack of understanding by local managers when assessing the level of misconduct leading to further inconsistency in how cases were dealt with.

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

The MPS proactively and effectively identifies and manages threat, risk, and harm from corruption as part of its governance structure for the organisation.

There is sufficient analytical capability and capacity to carry out pro-active work such as identification of individuals or groups vulnerable to corruption.

There are strong and effective monitoring of force systems and social networking sites.

Random and 'with cause' drug testing is undertaken by the force.

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

The force has a number of gifts and hospitality registers due to be centralised in to a single register in Autumn 2014 and published on the force website. It is recognised by force senior officers that further guidance on what can be accepted by staff is needed.

The force has improved its procurement processes but until the central gifts and hospitality register is in place there has been limited cross-checking between the two.

**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 force was making progress to ensure all staff were aware of the Code of Ethics but there was no clear process to evaluate whether staff understand the messages from chief officers or from training.

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

Audits of decisions and investigations are undertaken, but staff associations are concerned about how staff from minority groups are being treated in discipline cases.

Gross misconduct cases are conducted by trained senior officers chaired by a single chief officer to ensure consistency.

Lessons learned were circulated but the force did not follow-up any actions in a structured way.

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

There is good capacity to develop intelligence and proactively search for and investigate corruption issues.

The force has robust processes in place to reduce the risk of compromise and operates efficient operational security tactics to identify corruptors or corrupt staff.

The anti-corruption unit (ACU) was sufficiently resourced.

# The force/constabulary in numbers



## Complaints

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

**7,029**

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

**15.8**

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

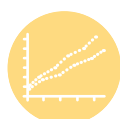
**1,775**

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

**4.0**

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

**2.6**



## Business interests

Applications in 12 months  
to March 2014

**1,818**

Approvals in 12 months  
to March 2014

**1,808**



## Resources

Proportion of workforce in  
PSD/ACU

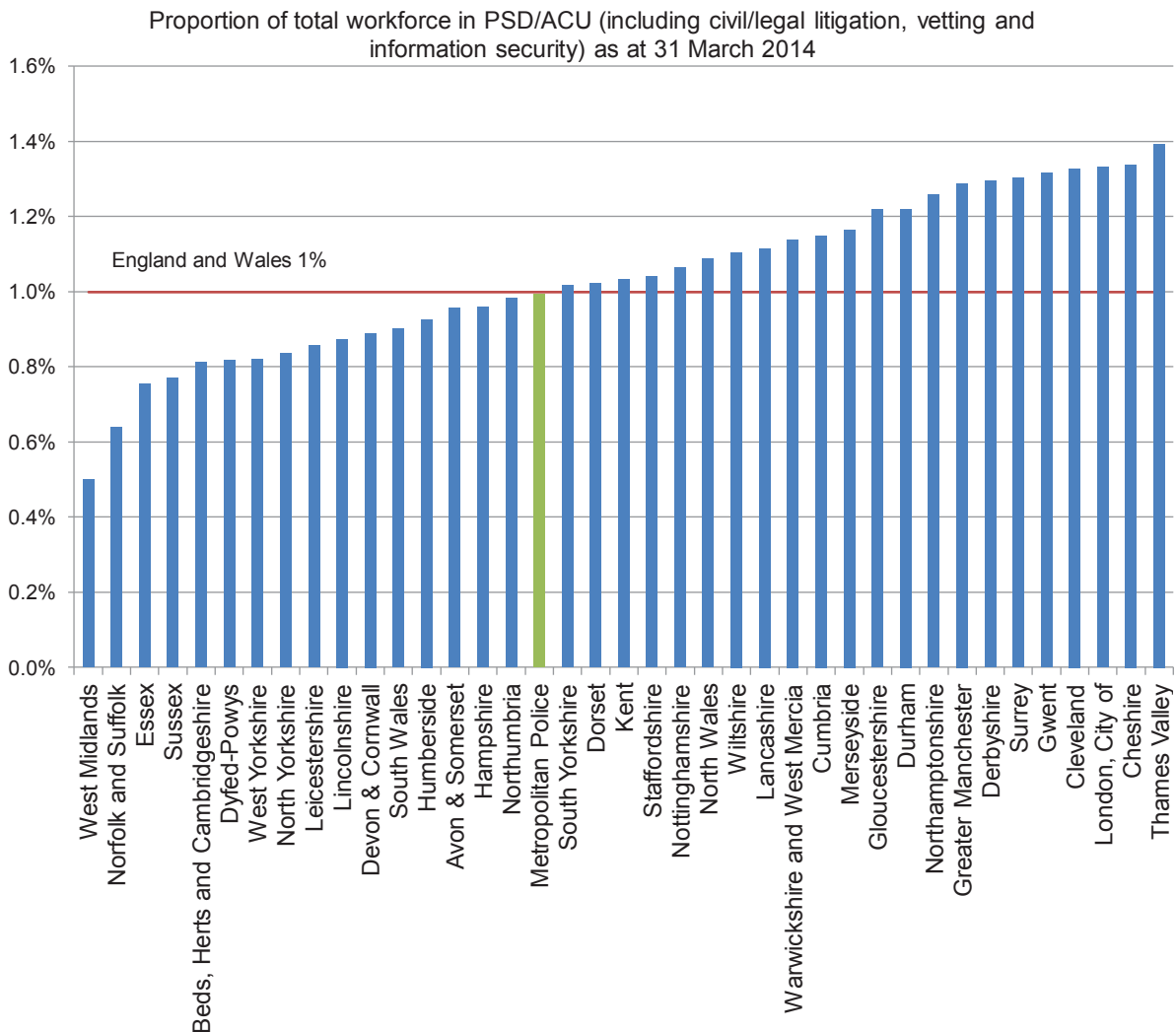
**1.0%**

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, *Without fear or favour*<sup>1</sup> we found evidence that did not support the concerns previously raised 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 2014 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.justiceinspectorates.gov.uk/hmic/](http://www.justiceinspectorates.gov.uk/hmic/) in early 2015.

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

3 *Code of Ethics - A Code of Practice and Principles of Professional Behaviour for the Policing Profession in 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 four areas for improvement from the 2012 inspection report. These were:

- (1) to review existing media policy following the Leveson Inquiry
- (2) to incorporate the reviewed media policy into the force communication strategy
- (3) to improve how gifts and hospitality are accounted for
- (4) to enhance how the contracts and procurement register is cross-checked with the register on gifts and hospitality.

Following the conclusion of the Leveson Inquiry, the MPS has reviewed its media policy and has implemented clearer guidance on relationships with representatives from the media. This provides direction for staff about how to conduct these relationships and manage meetings. The guidance is now incorporated into the force communications strategy. The force continues to use a central register setting out contacts with the media. This makes sure that a record is kept of meetings between senior officers, staff and the media. The register is published on the force website and is available for public scrutiny. The department of professional standards (DPS) continues to monitor press coverage daily and works with the media department to identify possible leaks of information from the force. Any concerns are followed up to identify the source of unauthorised disclosure of information and investigated.

The third area that needed improvement was accepting and recording gifts and hospitality received by police officers and staff in the MPS. The force maintains a number of registers showing what gifts and hospitality have been accepted and what was offered but declined. Information is made available to the public through the force website. The force has further introduced a new gifts and hospitality policy. HMIC found that the majority of staff understood and followed this new policy. However, some members of staff said they are now unlikely to accept any form of gift or hospitality regardless of the circumstances. Chief officers recognise that this is an area on which staff need more guidance. From autumn 2014, all gifts and hospitality registers will be recorded and managed centrally on one electronic system by the DPS. These will continue to be published on the publicly-available MPS internet site. However this inspection did not provide a comprehensive audit of the application of all of the policies that the force has in place.

The final area of concern that HMIC highlighted in its 2012 report was the need to improve the link between contract and procurement registers with the gifts and hospitality register and to make sure these have clear cross-references. HMIC found there are processes in place to ensure decisions on contracts and procurement agreements are transparent. The Mayor's Office for Policing and Crime (MOPAC), which includes a joint audit committee, scrutinises these decisions. During this inspection, however, HMIC found that these checks were only made where contracts are awarded in excess of £50,000. Contracts or procurement decisions and awards below £50,000 were not subject to that same level of scrutiny. The force is not confident about the consistency and accuracy of the way that the gifts and hospitality registers in each borough or directorate are currently collated and presented. The planned move to a single register managed by the DPS in Autumn 2014 will increase the consistency of the way gifts and hospitality are recorded.

# 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 commissioner has led the force in its work to create a culture that promotes ethical behaviour and challenges poor practice. The MPS has identified that policing professionalism is so important to its goal of achieving a 20 percent increase in public confidence that it has dedicated it as one of the four areas in its 'One Met' long-term plan to change the organisation<sup>1</sup>. An assistant commissioner has been appointed specifically to oversee policing professionalism.

The commissioner holds monthly senior leadership events with senior police staff and chief superintendents, and six-monthly sessions for chief inspectors and superintendents. The chief officer team, led by the commissioner, also holds briefings for all other ranks of police officers on a continuous cycle. These briefings were held in 2012 and 2014 and have included training on professional standards, MPS values, integrity and ethical behaviour.

The commissioner also talks to staff via monthly question and answer sessions held on the force intranet. He takes this opportunity to reinforce the importance of high standards of professional behaviour.

The MPS has used an outside theatrical organisation to design a number of scenario-based performances incorporating the Code of Ethics for leadership briefings. The scenarios will be made available for senior leaders to start conversations with staff on ethics. The MPS calls this programme 'Met conversation'.

Officers and staff are aware of the boundaries they needed to keep within to maintain their professional behaviour. They understand how it can have an impact on members of the public and colleagues. HMIC found that a number of constables had not heard of the 'Met conversation', however. It also found that large numbers of staff hold the view that messages on standards and behaviour focus on force performance, standards of dress and what they perceived as less important matters such as a ban on tattoos on the face or above the collar<sup>2</sup>.

HMIC found that while the force is investing time to ensure officers and staff understand what is expected of them, there is not a clear process to evaluate whether police officers and staff have received and understood MPS messages, direction and instruction on professional behaviour, and how they should be put into practice.

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1 [http://www.met.police.uk/foi/pdfs/priorities\\_and\\_how\\_we\\_are\\_doing/corporate/one\\_met\\_mps\\_strategy\\_2013\\_17.pdf](http://www.met.police.uk/foi/pdfs/priorities_and_how_we_are_doing/corporate/one_met_mps_strategy_2013_17.pdf)

2 The MPS introduced a policy in 2012 that prohibited officers from having tattoos on the face or visible above the collar line or on the hands and ordered that all existing tattoos must be covered.

HMIC found that policies and procedures setting out what ethical and professional behaviour meant for police officers and staff are in place. Audits are undertaken across the MPS. The force had a well-structured process to develop policy in this area; the head of department or borough commander is responsible for following up audit findings and making changes where needed. These audits are followed up during an annual review that is co-ordinated by the DPS. HMIC found good evidence that audits are conducted routinely. For example, an audit was carried out as part of a recent review of the roads and transport command. This came about after the force found that there were high levels of incivility complaints from members of the public.

HMIC found that some leaders, including first-line supervisors, did not understand how important it was to promote and encourage ethical behaviour or to check that their staff understood what is expected of them in their professional and private life. HMIC also found that the force had a significant amount of staff on temporary promotions. This was reported to HMIC as it created problems with the consistency and quality of supervision. Problems were particularly acute at the temporary sergeant rank. HMIC was pleased to note, however, that the force had recently addressed such problems with a round of permanent promotions at a variety of ranks. This promotion process includes assessment criteria that measure and tested officers' ethical behaviour and knowledge of the values and standards expected by the force. After promotion every officer has to attend a mandatory training course which outlines the standards of professional behaviour that are expected of them. This training course applies to all officers who are promoted, up to and including the rank of chief superintendent.

HMIC found that in general unethical and unprofessional behaviour was challenged appropriately. HMIC found that officers and staff had good knowledge about the confidential reporting process and that staff at all levels took a strong stance against incidents of serious misconduct and criminal behaviour and reported this to managers. HMIC was given examples where officers and staff had challenged inappropriate behaviour and reported wrongdoing, including criminal offences.

The force has mapped the Code of Ethics against its values of integrity, courage, compassion and professionalism. An implementation plan is being finalised and, after consultation with senior leaders, it will be rolled out as part of the regular events that are held between senior leaders and staff. Senior managers will be expected to communicate with all their staff using the 'Met conversation' programme. HMIC acknowledges this is work in progress and it will monitor its effectiveness.

The force has introduced a process called 'right line, on-line' which enables staff to report concerns about corruption or integrity in confidence, using forms on the force intranet. All staff that HMIC met understood and knew about this system. Staff associations and support groups are also used to report wrongdoing and to advocate individual cases on behalf of their members.

Staff are aware of their responsibility to challenge and report misconduct and unprofessional behaviour and messages about this are refreshed regularly. HMIC found, however, that staff do not always feel they would be supported when they do report misconduct. HMIC spoke to a number of staff who expressed a sense of nervousness about reporting unacceptable behaviour as it put the spotlight on them as much as the officers involved. These staff had no experience of reporting and thus relied on what they thought might happen. Although there was an inconsistent view as to the degree to which they would be supported by local managers, all staff stated they would report the matter either to a senior officer or local manager.

The force has a clear policy that outlines the obligation to declare any change in circumstances in an officer or staff member's personal associations and relationships. Officers and staff were aware of their obligations to notify the DPS. Notifications to the DPS are reviewed and acted upon appropriately: the staff who are the subject of the notification receive a personal briefing from the anti-corruption unit (ACU) and an action plan is developed where appropriate. HMIC found some confusion because journalists have recently been added to the list of notifiable associations. Some staff were unclear about the difference between inappropriate and notifiable associates. The view from staff is that you do not have any contact with the media and refer everything to the press office. The force has (HMIC acknowledges) recognised this area of misunderstanding and is in the process of amending the policy so staff are clear about the approach they must take when dealing with journalists and how to notify the DPS of any association with journalists. During the inspection, HMIC confirmed that all contact with senior officers and police by journalists and media representatives are recorded and made available to the public on the force internet site.

All applications for secondary employment or business interests by all members of the MPS are processed centrally by the DPS, which makes consistent decisions and conducts appropriate enquiries. These include checks against attendance, complaints and discipline records. In addition, where applications are refused for secondary employment or business interests, and intelligence or information is received that the officer is conducting that employment or business in spite of his or her application having been refused, further checks are carried out. The DPS has started disciplinary procedures where appropriate (HMIC confirmed this by carrying out file checks).



The use of the National Decision Model (NDM) is a clear part of training in such areas as firearms and public order. HMIC found that officers not engaged in these specialist duties did not have the same level of understanding of the NDM. In focus groups, for example, staff were unable to describe that the NDM prescribed that all decision-makers are required to consider the force mission and values in reaching their decision. During the checks of the DPS files, however, HMIC saw good evidence that the DPS implemented the NDM. The files showed that the DPS use the NDM as part of the severity assessment and prioritisation using a red, amber, green (RAG) matrix to decide the investigative response and level of resourcing.

While the NDM was not fully described in focus groups, staff explained how the DPS staff take part in initial training for all staff on the standards of ethical and professional behaviour. It was further explained how specific training took account of ethics and professional behaviour, for example, the recent training on stop and search included a specific section on unconscious bias. Staff stated they also completed mandatory e-learning provided by the National Centre for Applied Learning Technologies (NCALT). Staff did not view this method of training positively.

Officers and staff described how high standards of ethical and professional behaviour are a constant theme throughout their training. They gave examples of training in the use of Police National Computer (PNC) and in specialist training such as using firearms.

The chief officers provide sufficient information to the MOPAC to enable effective governance and accountability on integrity issues (including misconduct and unprofessional behaviour). MOPAC's Board and the MPS Board meet every fortnight. MOPAC also holds public 'challenge meetings' with the commissioner and deputy commissioner by which it can oversee integrity issues. There is a relationship of openness and transparency between chief officers and MOPAC, which has established a team to manage oversight of professional standards, anti-corruption and file review and is further developing ways to improve governance.

Chief officers closely monitor integrity issues (including misconduct and unprofessional behaviour) at governance meetings in a way that allows them to understand fully the issues, and to identify the need for action. HMIC found a strong governance process, through which the force was accountable to MOPAC, with a regular professional standards strategic committee (PSSC) chaired by the chief officer lead. This is supported by monthly DPS performance meetings, chaired by a deputy assistant commissioner (DAC) and a complaints performance board. HMIC also found strong evidence that the force discussed professional standards issues at the force management board meetings. These had recently included a briefing in March 2014 entitled '*Corruption in the MPS*', which was presented by the DAC



and informed the most senior managers of the current threats facing the force and how the DPS was responding to them. The briefing also provided management information about officers and staff who were on restricted duties or suspended, current investigations, data on disciplinary hearings and a breakdown of cases by employee ethnicity.

In addition to this the head of the DPS meets the DAC on a weekly basis to review investigations and emerging threats.

The force had a detailed action plan in place to deal with problems with professional conduct and integrity, with clear objectives, timescales, milestones and updates.

The force has now undergone restructuring and a professionalism portfolio under the command of an assistant commissioner oversees several areas relevant to maintaining high professional standards. These include: security of information, risk and organisational learning, leadership and integrity, record and document management, estates, vehicle fleet, high-profile enquiries or issues such as undercover policing, professional standards and the 'total professionalism' programme, which focuses on people, values and behaviour. HMIC acknowledges this major change in the force structure has been introduced recently and will monitor how this will further encourage a culture of challenge and reporting of wrongdoing.

## Understanding integrity

Details of all occasions where officers and staff are offered gifts or hospitality are fully recorded but not in a centrally-held database. The registers on which offers of gifts or hospitality are recorded do not include entries stating when the gift or hospitality was refused. The records are not audited regularly and inappropriate entries are not challenged or investigated. Currently gifts and hospitality registers are operated by the human resources team in each department or area. While these registers are available on the force internet for the public to view, they are managed and maintained in an inconsistent way. HMIC found that staff generally understood their obligations about registering gifts and hospitality but a few individuals were unaware that they were required to record refusals as well. The force has recognised this and, from autumn 2014, a new policy will introduce the use of a single register that will be centrally managed within the DPS and be publicly available on the force website. This will ensure a consistent approach with regular audit and the ability to investigate inappropriate entries in an appropriate and timely manner.

The MPS recorded fully details of all occasions where officers and staff applied for authorisation for a business interest or secondary employment and also recorded the outcome of such applications. HMIC found the force has a clear policy on authorising business interests or secondary employment. The applicant's head of department or commander is part of the authorisation process which is managed through the DPS.

All applications are decided by the DAC. The head of the DPS audits the authorisation procedure regularly and completes appropriate checks. During the inspection, HMIC found that the DPS had completed 34 investigations into the business interests, secondary employment or membership of an organisation of staff members, following information that some were continuing secondary employment or membership which had not been authorised.

HMIC found that the MPS analyses integrity, misconduct and unprofessional behaviour cases to a high level in order to identify numbers and categories. A problem-solving approach is taken in relation to any identified issues by the dedicated analysts working within the DPS. HMIC found that analysis of the DPS operations and intelligence revealed a good understanding of the threats faced by the MPS. The DPS identified potential increased threats resulting from 'localised postings' of staff, technological advances and the financial downturn.

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

## Misconduct and unprofessional behaviour

During the inspection HMIC was satisfied that misconduct and unprofessional behaviour are considered when decisions are made about transferring officers and staff to specialist roles and for promotion. Individual disciplinary records of officers are also reviewed prior to support for attendance on the strategic command course and the fast-track development scheme.

The force uses the NDM to determine the severity of misconduct. A tasking and co-ordination process is in place in the DPS to manage and prioritise cases. All gross misconduct hearings are managed by a group of trained senior staff and there is a permanent commander who chairs the hearings with support from other commanders when required. In order to ensure equality all sanctions imposed at hearings are considered against a matrix that has been collated of previous sanctions for similar circumstances from past hearings.

A number of staff were concerned that the force only uses the sanction of dismissal at hearings. However, HMIC were informed by the DPS that in 2013/14, of the 186 cases that went to hearing, 13 were not proven or were discontinued. Of the 173 proven cases, 20 resulted in a written warning, 27 a final written warning, 4 were placed on unsatisfactory performance procedures, 2 were discontinued and 120 police officers and staff were dismissed. In the last year MOPAC, as the police appeals tribunal (PAT) body for the MPS, has upheld one appeal against the hearing's decision.

## Recommendation

**With immediate effect, the force should publish to all staff the outcomes of misconduct hearings. This should include sufficient circumstances of the conduct to allow staff to understand the boundaries of unprofessional behaviour and the sanctions it is likely to attract.**

The force made use of fast-track dismissal where appropriate and HMIC was provided with examples where this happened. The inspection found that both the assistant commissioner in charge of the professionalism portfolio and the DAC in charge of the DPS apply this power in a robust, consistent and practical way.

As part of the inspection HMIC reviewed a number of investigations and found that decisions were supported by and consistent with a clear rationale. Further, the investigation tactics were proportionate.

HMIC spoke with staff associations who hold the view that action and sanctions were made or applied inconsistently and that issues of misconduct and minor complaints were, in some cases, being dealt with too harshly. The cause of this was the view held by some managers that their decisions regarding misconduct were viewed as not strong enough, or motivated by inappropriate or exaggerated notions of political correctness. As a result, managers assessed the severity of cases unduly highly so that the investigation and eventual investigation would be undertaken by the DPS and not locally. This in turn resulted in delays to the investigations as the DPS assessed the cases' severity and returned them for local resolution. As discussed earlier in this report, HMIC believes the practice described indicates that managers in the inspecting and superintending ranks within departments and boroughs either do not have sufficient knowledge and / or lack confidence or are failing to assess and make the correct decision concerning misconduct cases.

Some support groups were further concerned that misconduct cases concerning their officers were usually assessed as severe and that re-assessments of the severity of the case were not undertaken as they were for other colleagues. The support groups also felt that if the officer under investigation is from a minority ethnic group they are more likely to face a gross misconduct investigation and in turn appear at a hearing. They expressed frustration that the MPS does not provide them with data on ethnicity breakdown against investigation, outcome and sanction.

Each department or borough is responsible for the investigation of complaints and conduct investigations relating to their officers or staff. To support this there is a professional standards champion within each department or borough who is responsible for providing advice and support locally and is the link between the DPS and the department or borough. During the inspection HMIC was told that the champions had little or no specific professional standards training and that local methods of investigating misconduct level cases were at times not consistent with each other. HMIC found that in one borough the champion supported local supervisors and managers to investigate complaints or misconduct, while in another borough the champion was provided with staff to both support investigations and, in the majority of cases, complete them. HMIC found that these staff tended to be on restricted duties and were invariably from the frontline local territorial policing teams.

HMIC found evidence that supervisors and managers wanted to pass complaints from members of the public directly to the DPS and not try and resolve these locally as set out in the MPS policy. Constables reported that they wanted their supervisors to deal directly with complaints as they felt it demonstrated good leadership. HMIC found, however, that a high volume of misconduct forms (MM1) sent to the DPS were assessed incorrectly by local managers as gross misconduct. The DPS then correctly returned these forms to local managers as they were suitable to be dealt with at a local level. Managers in the inspecting ranks within departments and boroughs either do not have sufficient knowledge of MPS policy and / or lack confidence to manage complaints of misconduct or are failing to assess and make the correct decision. This mistake is replicated in the superintending ranks where officers make a formal assessment of the matter before passing it on to the DPS.

## Recommendation

**Within six months, the force should ensure that all staff in inspector and superintendent ranks are provided with guidance on how to make an assessment of severity. The force should then monitor the number of times the DPS change the initial assessment and put in place steps to ensure that this is reduced.**

During the inspection, HMIC found that the gross misconduct hearings scheduled up to November 2014 included 62 cases (72 officers) with a further 10 cases being progressed by the practice support team for a future hearing. This means that although the force has to step outside the time prescribed time limits set out in the conduct regulations, the use in the majority of hearings of the same chairman at chief officer level ensures a consistent approach to the hearing process, findings and sanctions.

The DPS manages the register for business interests and secondary employment which contained, as at December 2013, 4,570 registered business interests – an increase from 3,445 since December 2012. For the 2013/14 year, the force had 1,818 requests for business interests of which 1,808 were agreed. The force website contains the 2012 register of interest but HMIC found that it has not been updated.

The expenses of chief officers, senior officers and police staff equivalent are also not published by the MPS.

## Recommendation

**Within six months, the force should ensure an up-to-date register of business interests, secondary employment and chief officers and police staff equivalent expenses is published on the force website.**

HMIC found that the force published the findings and sanctions for gross misconduct hearings on the force intranet. HMIC found that staff felt that there needed to be more information to explain why the gross misconduct cases were determined in the way they were, to encourage greater understanding of why an individual was dismissed.

HMIC found that officers, staff, support groups and staff associations could only recall hearings where the sanction was dismissal. The data from hearings for 2013/14 shows that first and final warnings were used in just under 26 percent of cases. The force should publish appropriate and sufficient detail in each individual case and an annual summary of sanctions.

Officers and staff receive regular training on integrity issues (including misconduct and unprofessional behaviour) and know their obligations to challenge bad practice. They are aware of the way that they should report wrongdoing and how they should challenge it. Initial training for officers and staff included clearly understandable sessions with input from the DPS. This was also the case for all leadership training.

HMIC is satisfied that cases are appropriately referred to the IPCC (Independent Police Complaints Commission) and that the DAC and the IPCC commissioners hold regular meetings. The MPS has taken a decision to refer cases to the IPCC when it is not clear as to whether a referral is formally required.

The MPS shares the IPCC 'lessons learnt' bulletins through the force intranet, HMIC found that many staff were not aware of the document. One member of staff attempted to show the inspection team where the bulletin was on the intranet but it was difficult to find. HMIC did not find any evidence that there is a structured way of using the IPCC bulletin to share lessons from across England and Wales and co-ordinate how the force responds to issues raised by it.

## Recommendation

**Within six months, the force should ensure it has an effective process to communicate to all staff, both locally and nationally identified lessons to be learnt on integrity and corruption.**

## Professional Standards training and resourcing

Staff in the DPS including the ACU receive training for their role and officers who have specialist skills such as surveillance maintain their accreditation. The ACU staff also complete training and live operations with other specialist staff within the force (counter terrorism command) and externally with the National Crime Agency (NCA). Supervisors have nationally-accredited training in criminal investigation including the senior investigating officer course. Both staff and managers have completed the College of Policing approved bronze and silver courses for professional standards and anti-corruption investigation. The DPS including the ACU demonstrated that they currently have an adequate number of staff trained to the appropriate level to carry out surveillance operations. They also have family liaison officers, staff trained to national and accredited interview standards. HMIC is satisfied that the force ensures staff are recruited with appropriate skills and these skills are maintained and, where needed, improved upon.

Succession planning (to make sure that the right staff are in place if someone leaves) takes place to ensure consistency in the DPS and the ACU, which has been given the authority to approach and recruit staff with necessary skills, such as surveillance, and have high levels of integrity.

The MPS ACU was resourced sufficiently. The force made a conscious decision not to reduce the level of resourcing to contribute to the spending review requirements or to fund the reduction in budget where monies were 'top sliced' by the Home Office to fund an increase in IPCC resources. During the inspection, HMIC was aware that the DPS has a high workload at present as members of staff are involved in investigating historical enquiries.

## Quality assurance

Regular audits take place to ensure that investigations can be justified and are dealt with at the right level. We conducted a review of a small number of DPS cases. This included reviewing up to ten randomly selected cases involving serious misconduct or criminal conduct. The aim was to check on timeliness, supervision and appropriateness of decision-making. HMIC found that investigations all have plans with clear supervision and decisions being made that assessed the threat, risk and harm using the NDM. HMIC was satisfied that the DPS carry out an assessment of investigations once an enquiry is complete and conducts operational de-briefs following activity such as surveillance, deployment of technical equipment and test purchase.



The force ensures that officers and staff carry out investigations in a timely way and to a high quality. As all anti-corruption investigations are completed by the DPS the force is, in these cases, also able to ensure a high quality of investigation as all resources and technical skills are provided from within the DPS. Both the organisation and the ACU staff acknowledge that covert investigations can be complex and require longer-term tactics to prove or disprove an allegation or intelligence. HMIC found good evidence that the force governance structures prevent unnecessary delays in investigations. During focus groups the DPS and the ACU members of staff were adamant that if there was intelligence or evidence of corruption they would rather resolve the threat than mitigate it due to concerns about completing it in a timely way.

There was a clear process to capture and record any learning, and disseminate it to the force effectively. The force publishes the lessons it has learned from its own investigations by way of 'lessons to be learned' articles and recently distributed an advice leaflet to staff entitled *Don't Cross the Police Line*. Staff told HMIC that they saw the intranet as positive, with 'lessons to be learned' articles coming up as 'recent stories' on the front page of the intranet. They were impressed that some officers were prepared to talk on camera about lessons they have learned and how their behaviour had affected them and the force.

There is a clear policy and consistent decision-making on suspension, resignation and retirement during investigations which is managed within the DPS and overseen by the DAC. As of March 2014 the force had 42 police officers, 34 special constables, 1 community support officer and 5 police staff suspended from duty. HMIC found good evidence of the reasons why a decision had been made to suspend or not to suspend from duty and further evidence of periodic reviews.



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

## Investigating corruption

The MPS proactively and effectively identifies and manages threat, risk, and harm from corruption as part of its governance structure in the organisation. It does so by assessing risk and taking proactive steps to mitigate risk. The DPS adopts a national intelligence model (NIM) approach to the identification and management of risk from corruption. The detective chief inspectors (DCI) within the ACU have a monthly tasking group which has oversight of all investigations. Senior Investigating Officers (SIO) meet fortnightly to review cases and agree the use of available resources and assets.

The DPS holds a six-weekly performance meeting. 'Officers of concern' are reviewed as are all officers or staff members against whom three or more complaints have been made in the previous 12 months.

The DPS has a daily 'grip and pace' meeting to assess any issues from the previous day and to ensure the current and next day's tasks can be resourced. HMIC found that if something needs allocating in a timely way the chair of the 'grip and pace' meeting has the authority to allocate resources. HMIC was satisfied that all these meetings concluded with clear action plans that were allocated to staff to carry out. Actions were reviewed at the next daily meeting.

The force regularly and proactively identifies vulnerable staff or groups using the NCA counter-corruption threat assessment and Transparency International Integrity Cycle. HMIC found good evidence of the force taking into account the four threat areas identified by the National Crime Agency (NCA, formerly SOCA) which are included in the threat areas that the MPS has currently identified. HMIC found good evidence that the DPS identifies issues such as the threat or risk of recruiting staff locally and then posting them to areas where they have strong family or social connections, which could cause a conflict of interest or lead to corrupt practice. HMIC was provided with examples of the DPS analysts' assessments of vulnerable groups that were fed back to senior management boards or departments such as recruiting and HR to consider.

Vetting arrangements comply with the national vetting policy and identify corruption risks at the recruitment stage for officers and staff. These are revisited on promotion or posting to sensitive roles. In 2015 a new vetting code will be produced by the College of Policing and the force will need to ensure it is prepared to comply with the conditions of that code. Vetting is managed within HR but the DPS also has access to vetting information. The vetting management board is managed by the same assistant commissioner who is in charge of the professionalism portfolio. This means that the DPS issues can be raised and that the DPS is aware of potential risks to the organisation. HMIC found that the intelligence flow between the two departments tends to take place if a DPS investigator asks for specific details about an individual or if the DPS is aware of an individual applying for a specialist post and there is a concern over his or her suitability.

The force monitors force systems and social networking sites and takes action when necessary. The MPS has clear policies on the use of social networking sites and the use of force systems. The force uses 'pop-ups'; messages that appear on computer screens reminding staff of their responsibilities and making them aware of the consequences of computer misuse. All police officers and staff spoken to by HMIC were clear that use of social media had to be appropriate and professional. During the inspection HMIC found clear evidence of proactive work that identified computer misuse and resulted in criminal convictions or appropriate misconduct investigations. HMIC was provided with information that the ACU completed 891 data requests relating to police computer systems between April 2012 and March 2013 rising to 1,004 such requests from April 2013 to March 2014.

The force does not carry out an audit of chief officer or senior staff diaries against the gifts and hospitality register and expense claims. Where intelligence is received or a concern is raised, the force has the capability to check registers and, if appropriate, investigate. MOPAC raised no concerns about the current governance arrangements for chief officers which include a monthly review of the commissioner's and deputy commissioner's gifts and hospitality. The deputy commissioner checks the management board members' registers. All of these are available to the public on the force website.

The force uses random and 'with cause' drug testing, and intelligence-led integrity testing to identify corruption. This is supported by clear policies that are understood by staff. During the last year the MPS has conducted over 600 random tests and used 'with cause' and intelligence-led integrity testing as regular tactics to lawfully prevent or detect crime or misconduct. HMIC saw good evidence of the appropriate and lawful use of such testing and are of the view this is a strength as the DPS has the capability and capacity to carry out this tactic regularly.

The force ensures that organised crime investigations are not compromised by officers over whom there are concerns regarding corruption or integrity and checks forthcoming operations are free from corruption to reduce the risk that they will be compromised. Given the crime and disorder issues that the MPS manages through both borough and force level teams, however, some risk of compromise remains. HMIC found that the force are acutely aware of the risk from corrupt officers or police staff and the increasingly sophisticated tactics deployed by organised crime groups to obtain police information or infiltrate the police service and gain access to its systems.

The force has robust processes in place to reduce the risk of compromise and operates efficient operational security tactics to identify corruptors or corrupt staff. HMIC were provided with examples of this and also during the inspection, found good evidence of an analysis that proactively identifies officers and staff potentially vulnerable to corrupt approaches by organised crime groups. This analytical work has led to both preventative and enforcement activity by the DPS and its ACU.

The ACU has officers who are trained in MPS anti-corruption policies and practice meet with the appropriate investigation teams across the MPS specifically to reduce the risk from corruption and compromise. The ACU have access to all intelligence systems in the force and check what departments, teams and individuals are working on, searching for and looking at and why they are doing this.

The force ensures the effective security of systems but not exhibits and case papers. The MPS has recently restructured information security assurance and it is now a part of the performance and assurance department that sits within the new MPS headquarter's shared services structure. The information security resource is made up of an information security officer, six information security assurance accreditors and five information security assurance assistant accreditors. The officers in these posts report to the head of information, law and security, who is the force data protection officer and departmental security officer. They further undertake information management policy development and maintenance, information security assurance, audit and security incident reporting. If they identify any issues, these are reported to the DPS, which assesses the information and decides upon the investigative response.

The MPS has a clear policy on information management which was implemented in January 2014 and is due for review in 2018. This is supported by an IT security system called 'hunterman' that protects force systems from internal and external attack or illegal access. 'Hunterman' can also audit usage and provide information on what has been accessed by individuals, and is currently deployed on the most sensitive computer systems. As part of the MPS IT strategy, all new computer systems require an audit function similar to the 'Hunterman' system to be incorporated.

The MPS also has a clear policy to protect the security of its estate. It provides appropriate levels of security based on threat assessment and the functions operating out of each building or within parts of certain buildings.

HMIC found that the force did have a records' retention and disposal policy which was due for review on 24 August 2014. This policy clearly explains the legal requirements and classifications of records for retention. HMIC found that the force currently operates a system which means that departments and boroughs work with property services to ensure physical records are stored locally 'to facilitate timely retrieval'. HMIC is concerned that this could lead to inconsistent storage and retention of records across the force. The assistant commissioner for professionalism explained how he shared these concerns and was undertaking a review of records retention and disposal, which had been commissioned prior to this inspection.

HMIC noted that the newly-created professionalism portfolio under the assistant commissioner includes the records and document management function, security and information assurance of the force estate and computers systems. To manage this, a governance board has been put in place and this board will have the authority to change the process for managing documents following the review.

## Intelligence

The force proactively gathers actionable intelligence on corruption and grades it in compliance with the relevant Authorised Professional Practice (APP). During reality testing checks and focus groups, HMIC found good evidence of both proactive and reactive gathering of intelligence.

During the inspection, HMIC found that good decisions were made at the intelligence assessment and development phases of the process, using the ACPO Counter Corruption Advisory Group (ACCAG) guidance. Intelligence was further recorded using the National Intelligence Model. The file reviews showed evidence of developed intelligence being then allocated for both overt and covert investigation. Decisions were recorded and there was evidence of supervision throughout the processes within the ACU.

HMIC found the ACU monitors confidential reporting mechanisms and overt reporting by individuals; conducts intelligence-led investigations; audits systems; and carries out integrity testing. An example given to HMIC was that if a celebrity is arrested, systems are pro-actively checked to establish which staff have accessed personal information for non-policing purposes. A gross misconduct investigation will then be instigated. HMIC found that the ACU uses lawful tactics to develop or dismiss intelligence. These include the accessing of communication data for which there were 636 applications in the period between April 2012 and March 2013 and 864 applications for the period between April 2013 and March 2014. This represented an increase of 35% in applications over the period we looked at.

There is a strong tasking and coordinating mechanism in place by which corruption issues are considered, recorded, dealt with and reviewed. The force follows the national intelligence model (NIM) processes. HMIC found good examples of intelligence being produced and used to enable decisions by the management of the ACU. The force had a control strategy in place with an intelligence requirement, collection plan and clear tactical responses to prevent, disrupt and investigate corruption.

The ACU had regular tasking and coordination meetings, which are recorded, to co-ordinate actions and determine follow-up steps. The results of such meetings are fed into department tasking and co-ordination meetings chaired by the head of department, which cover issues such as public complaints, conduct investigations and reviews of all IPCC independent, managed and supervised cases.

Actionable intelligence was acted upon and monitored through the robust tasking and co-ordination processes that HMIC found to be in place. The ACU had a daily 9am meeting to assess intelligence from various sources and determine the threat, risk or harm. If any risks were so identified, resources would be allocated to meet them at the daily 'grip and pace' meetings.

The MPS effectively identify those situations in which there may be multiple suspects and multiple offences by a single suspect, and further determine the individuals involved. Processes were in place for ensuring action against these individuals. The analysts within the department generate charts of associations and links as well as researching force systems for suspects under investigation.

## Capability

During focus groups and interviews, HMIC found that members of staff were satisfied with the level of resourcing which was allocated to them. HMIC found clear evidence that appropriate decisions were made which recorded and explained why there was any delay or why immediate steps had been taken to reduce any threat, risk or harm. HMIC is confident that the ACU responds to issues and proactively looks for corrupt or improper practice by officers and staff.

HMIC found that members of staff have the specialist skills and training appropriate to their role and function. The performance of DPS and the ACU is regularly monitored by the MPS, which reviews the timeliness and quality of handling complaints, investigations, decision-making, outcomes and appeals. There are regular confidential briefings to the commissioner to ensure he is aware of any threat, risk or harm. The external oversight is transparent with MOPAC continuing to develop improved processes to hold the MPS to account. During the inspection HMIC found good evidence of strong governance at all levels.

HMIC found that corruption cases are referred to the IPCC in accordance with the statutory guidance. A good working relationship between the MPS and the IPCC was reported to HMIC and there are regular meetings between them. A single point of contact for covert referrals and investigations is in place. All cases reviewed by the inspection confirmed that referrals are made appropriately and within a reasonable timeframe.

# Recommendations

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- **With immediate effect, the force should publish to all staff the outcomes of misconduct hearings. This should include sufficient circumstances of the conduct to allow staff to understand the boundaries of unprofessional behaviour and the sanctions it is likely to attract.**
- **Within six months, the force should ensure that all staff in inspector and superintendent ranks are provided with guidance on how to make an assessment of severity. The force should then monitor the number of times the DPS change the initial assessment and put in place steps to ensure that this is reduced.**
- **Within six months, the force should ensure an up-to-date register of business interests, secondary employment and chief officers and police staff equivalent expenses is published on the force website.**
- **Within six months, the force should ensure it has an effective process to communicate to all staff, both locally and nationally identified lessons to be learnt on integrity and corruption.**