



Inspecting policing  
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# Police Integrity and Corruption

North Wales Police

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

The police officers and staff in North Wales Police have a good awareness of what is expected from them in terms of integrity, although the chief officer team could do more to promote this to the workforce. There needs to be a review of the force's capacity and capability to identify and respond to threats and risks. The force has made some good progress on recommendations contained in the HMIC 2012 inspection.

### Summary

The chief constable is leading on the promotion of ethical behaviour, including the Code of Ethics, to his officers and staff. The chief constable holds roadshows to communicate with staff with an emphasis on improving culture, standards and leadership. Staff would welcome personal visits to stations by the chief officer team to enhance their understanding of these areas. The force has plans to communicate and embed the new Code of Ethics to the force. There is training for staff on ethical and professional behaviour but it is not consistently provided to all staff. Staff can make confidential reports of wrongdoing by their colleagues through a confidential external company using 'Safecall'. There is a clear policy to guide staff who wish to report wrongdoing; the majority of staff interviewed by HMIC as part of the inspection had the confidence to report directly to the professional standards department (PSD).

Intelligence is reviewed, but the force does not proactively seek actionable intelligence or identify vulnerable staff or groups. The force makes use of 3Ami software to monitor IT systems and has a robust approach to social media. The force uses intelligence-led integrity testing but does not undertake random drug testing although substance misuse has been identified as the weakest organisational control measure. There is little capacity to undertake proactive work to identify and minimise threats from corruption.

Staff in the PSD and the anti corruption unit (ACU) receive some training for their roles but they have not attended the College of Policing bronze anti-corruption course.

Misconduct hearings are carried out in a way which promotes transparency, effectiveness, efficiency and legitimacy.

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

Two areas for improvement were identified in the 2012 report.

The first was the requirement for a comprehensive media policy that was seen to be working well. Good progress has been made in this respect.

The second concerned the need for a centralised gifts and hospitality register. The register is now in place, but force policy is not being followed or audited.

**What progress has the force made in communicating and embedding ethical and professional behaviour to all staff, including the new Code of Ethics?**

Staff know what is expected of them.

The force needs to provide specific training to staff on the need for ethical and professional behaviour. The force also needs to develop an audit function for business interests held by staff.

Officers and staff are aware of the boundaries of unprofessional/professional behaviour and understand how this affects both the public and their colleagues.

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

The force has governance structures in place to monitor integrity-related issues. However, the force does not investigate misconduct matters in a timely way.

The PSD needs more capacity to investigate and monitor areas of risk within the force including business interests and notifiable associations.

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

The force has a tasking and co-ordinating structure in place for addressing corruption issues together with a control strategy to manage risks.

The force does not identify vulnerable groups.

The ACU needs more capacity to identify proactively and minimise risks to the force.

**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 embedding 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?**

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.

# The force/constabulary in numbers



## Complaints

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

**321**

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

**12.4**

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

**64**

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

**2.5**

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

**2.6**



## Business interests

Applications in 12 months  
to March 2014

**91**

Approvals in 12 months  
to March 2014

**90**



## Resources

Proportion of workforce in  
PSD/ACU

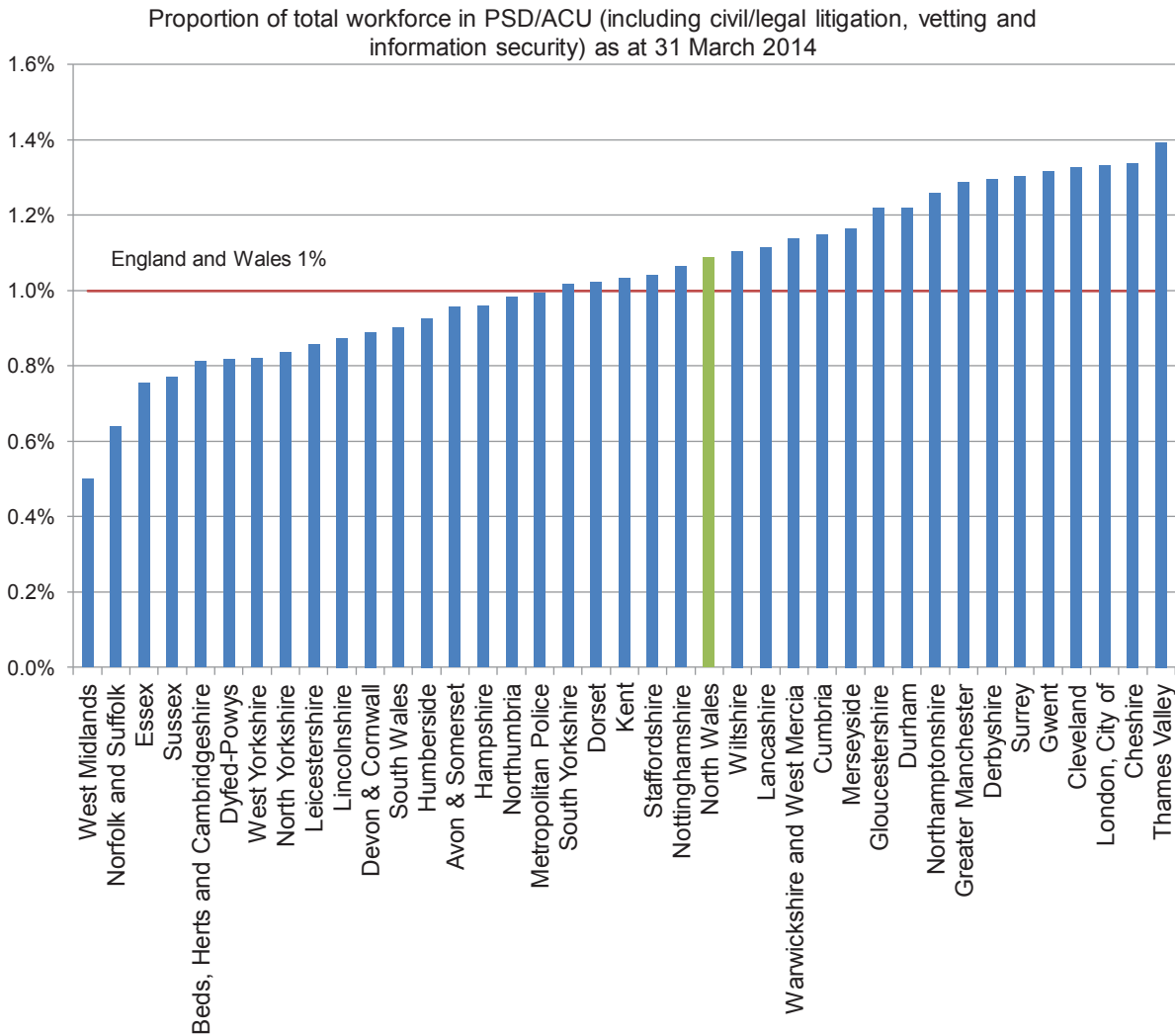
**1.1%**

Proportion of workforce in  
PSD/ACU  
– England and Wales

**1.0%**

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





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

## Introduction

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

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

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

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

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

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

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

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

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

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

HMIC found that the force has made good progress overall since 2012.

Two areas for improvement were identified in the 2012 report. These were:

1. The need for a comprehensive media policy;
2. The need for a centralised gifts and hospitality register.

There has been good progress; a comprehensive media policy has now been introduced and appears to be working well. Since its introduction there have been no identified inappropriate disclosures to the media. The force tightly controls official access to social media, and monitoring procedures and software are in place to assess how such media are being used by members of staff. Recently, through the establishment of a social media user group, a newsletter has been produced that highlights risks that are posed to users of social media, and the effect this could have on them as members of the force.

In the second area, HMIC found the force had made good progress but there is still a small amount of work to complete. The force has introduced a centrally-held register supported by a policy and procedural guidance, and the assumption from staff was that gifts and gratuities should not be accepted. However, from a review of the register published on the force internet, HMIC found that the policy has been inconsistently applied. The policy stated that alcohol should not be accepted, but some staff interviewed by HMIC were unclear of this fact. Entries on the register included an acceptance of whisky on one occasion and wine on another. In addition, there was little evidence of recording refusals and nothing to show that members of the chief officer team (other than the chief constable) or any other staff had been offered, then accepted (or indeed refused) any gifts or hospitality. Additionally, there is no formal or regular process for auditing the contents of the register.

# What progress has the force made in communicating and embedding ethical and professional behaviour to all staff, including the new Code of Ethics?

## Leadership and governance

The chief constable holds roadshows to communicate with staff, and there are regular meetings with staff representative groups. The staff magazine called '*Communicate*' has been used by the chief constable to give guidance on 'what you do, what you say and how you look matters', and is supported by a poster campaign. The chief constable's emphasis was on the importance of improving culture, standards and leadership, and staff would welcome personal visits by the chief officer team to stations to discuss the subject to enhance their understanding.

Officers and staff are aware of the boundaries of professional behaviour and understand how poor behaviour affects both the public and their colleagues. 'Top tips Tuesday' and 'Need to know' are force-branded communication products which reach staff well and are used regularly to promote awareness of important issues, for example, a recent communication related to the 'gifts & gratuities' policy.

The force has produced an online anti-corruption information package, prepared by the ACU, which has been accessed 2,000 times since it was launched. The force needs to raise the awareness of the personal responsibility of officers to report and challenge misconduct and unprofessional behaviour. This may give them the confidence to report more incidents.

The force has a policy review officer and a comprehensive set of policies contained on 'Sharepoint,' a commercial IT package, and these are reviewed within a structured programme. There is a need to strengthen policies by incorporating ethical standards which should have been undertaken as each policy was due for review. With the introduction of the Code of Ethics this can be considered as part of a thematic review by the force, with all policies risk assessed and prioritised for updating.

Not all managers demonstrated their personal commitment to ethical behaviour. They did not always check whether staff understood what was expected of them in their professional and private lives. HMIC found examples of where challenges to behaviour had been made, resulting in dismissals from the force or the introduction of action plans.

The staff we interviewed as part of the inspection were generally aware of their responsibility to challenge and report misconduct and unprofessional behaviour, and felt supported when they have done so, irrespective of rank, role or experience. HMIC found differences in the understanding of the process that should be followed. Some staff would not challenge or report unless the matter was serious, and other staff believed that previous investigations into lower-level incidents should have been reported through their local managers rather than being reported direct to the PSD. HMIC was unable to find evidence of any audits being carried out by the force on challenges that had been made to assess if there was anything more that it needed to do, or to identify any gaps in its approach. Some

staff used the 'breaching of ground rules' as a basis for some challenges. This term was a legacy from the previous chief constable who had used it as his way of promoting ethical behaviour, but it still has resonance within the force.

The force has a performance improvement unit (PIU) to support supervisors who challenge officers on matters of performance. The force included questions about challenging unethical and unprofessional behaviour in promotion boards for sergeants.

The force has plans to communicate and embed the new code of ethics. The chief constable has taken personal responsibility for this, and chairs the governance board that will oversee the implementation. The board has good representation from departments across the force. The board's terms of reference and plan were completed in July 2014. The plan sets out a number of actions with timescales.

There is a clear policy outlining the obligation to declare any change in circumstances in an officer or staff member's personal associations and relationships, and officers and staff members were aware of their obligations in this regard. The ACU holds a record of all associations declared, and these are assessed and graded against clear criteria, to indicate whether the association is one that the force merely needs to be aware of, or whether there are conditions that must be met in order for the association to be permitted. If the association is inappropriate, then the action to address this is highlighted.

The National Decision Model (NDM) is used at all levels in the force, and officers and staff have been trained to understand its application. Control room staff received a four-day programme on the model which included a focus on mission and values which are at the core of the NDM. HMIC found there was good evidence that the NDM is being used by the ACU, with rationale being recorded for decisions made at key points during an investigation.

There is training for staff on ethical and professional behaviour, but it is not consistently provided across the force. Nevertheless, there is a very strong focus on ethical training for new recruits and a structured approach for supervisors. The implementation plan for the introduction of the Code of Ethics contains an objective for the force to review training programmes and include ethical dilemmas. Some supervisors indicated that a scenario developed by the College of Policing had been used to support the introduction of the Code of Ethics. A pilot training scheme is planned to take place in Wrexham local policing area which may provide a useful opportunity to train staff on these issues as part of face to face training, incorporating ethical dilemmas and issues relevant to unconscious bias. NCALT, an e-learning tool, is available for use by staff but this is not mandatory. The force has an induction programme for new police staff with a requirement for the line manager of the new employee to complete an 'induction checklist'. The checklist reviewed by HMIC was not dated, and did not place any requirement on a manager completing the form to set out the boundaries of acceptable behaviour, or to reinforce important integrity-related policies.

Chief officers provide information to the police and crime commissioner (PCC) to enable governance and accountability on integrity issues including misconduct and unprofessional behaviour. The deputy chief constable (DCC) meets with the deputy PCC every two weeks and the force reports to the strategic executive board of the PCC every quarter on PSD matters. The information contained in these reports does not include all integrity-related data, including timeliness in dealing with misconduct or public complaints, or regarding internal fairness at work allegations. This is important in considering whether there may be links to misconduct matters that are reported. The data contained in the reports are not accompanied by any analysis. For example, the June 2014 report recorded a 20 percent drop in the number of anti-corruption reports between 2012/13 and 2013/14, but there were no supporting analyses giving any reasons for this, or of the outcome of the allegations that had been made.

Integrity issues (including misconduct and unprofessional behaviour) are actively monitored by the DCC, as the person responsible for all misconduct issues within the force, at fortnightly governance meetings with the head of PSD. He also receives quarterly reports that enable him to understand fully any issues faced by the force and identify the need for action. The force strategic intelligence assessment for the PSD highlighted a number of areas of concern, some of which were structural or procedural, and potentially had an impact on the ability of the force to minimise risk. This included the lack of a 'force-wide mandatory performance appraisal and review process'.

## Understanding integrity

The force has a central register for business interests. However, the force has no formal review procedure and does not cross-reference officers who have business interests against their record of attendance or performance to identify whether there is any correlation that may require further investigation on whether their business interest is affecting their role within the force. HMIC was informed that the force operates 'on trust' and that first and second line managers have limited knowledge of any approved business interest or 'notifiable association' pertaining to officers or staff for whom they are responsible. The force needs to develop and implement processes in this regard.

## Recommendation

**Within six months, the force should ensure it carries out regular audits of integrity-related registers including gifts and hospitality, business interests, notifiable associations, expense claims, procurement activity and other records to identify potentially corrupt activity.**

The March 2014 strategic intelligence assessment for the PSD incorporated a good level of analysis. Recommendations from this analysis are incorporated within the PSD control strategy.

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

## Misconduct and unprofessional behaviour

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. This includes applications for courses such as the strategic command course and the fast-track development scheme.

The force tries to ensure that all staff, irrespective of rank or role, are treated fairly and equally in terms of how investigations are assessed, recorded and carried out, and how sanctions are imposed. HMIC found evidence that investigations are reviewed at various levels within the PSD, including by the detective chief inspector and superintendent. The PSD has quarterly meetings with the IPCC to review misconduct decisions, as well as any trends in data reported to the IPCC and any other relevant issues. This role is delegated to the head of the PSD, although the DCC does dip-sample decisions to ensure consistency and fairness in the decision-making process. No issues were raised by the staff associations about the fairness of processes undertaken.

The force uses 'Safecall' (an independent external company) to enable staff to make confidential reports of wrongdoing. However, HMIC heard accounts that staff would be more likely to contact the PSD directly and to provide their contact details if they wanted to report issues of wrongdoing. The confidential reporting line is more likely to be used where the challenge relates to an officer or staff member more senior than the person reporting. Over the period covered by the 2014 Strategic Assessment for PSD, Safecall referrals made up only nine percent of intelligence reports received by the ACU.

The force responds to reports of wrongdoing by staff in an effective but not timely manner. HMIC found evidence that although appropriate guidance on the management of reports was followed, timeliness was an issue for the force as workloads within the PSD were heavy.

HMIC found that the force made public the gifts and hospitality register, the chief officer expenses register and the register of business interests. These registers are easy for the public to find on the force website.

The PSD has a single point of contact for matters requiring independent police complaints commission (IPCC) referral, and decisions are dip-sampled by the DCC for consistency and appropriateness. Through the reality testing conducted, three files were checked in which there should have been a mandatory referral. Although this sample was small and not statistically significant, in two cases the referral was made, while in the third case, the officer was dismissed and there was no referral.

The force shares learning by circulating the IPCC *‘Learning the Lessons’* bulletin via the force intranet. However, HMIC found that not all staff were aware of the publication. There was much greater awareness about the *‘Need to Know’* bulletin, although this does not relate exclusively to PSD issues.

## Professional standards training and resourcing

Staff in the PSD and the ACU receive some training for their roles, but not regularly. The majority are qualified through the professionalising investigation programme (PIP) at level 2. There is a suitably trained senior investigating officer within the PSD; however, that officer is also on the force CID duty rota, which exposes the force to some risk since the officer may not be present in the PSD when needed. None of the PSD or the ACU staff have attended the College of Policing accredited ‘bronze’ anti-corruption course, although consideration is currently being given to send one officer on the course.

Succession planning does not take place to ensure consistency and the maintenance of skills within the PSD and the ACU. Career progression to the ACU is generally through staff being recruited from the PSD. For a small unit, this limits the scope of recruiting other suitable staff from other areas of the force.

Misconduct hearings are carried out in a manner that promotes transparency, effectiveness, efficiency and legitimacy. This includes using an appropriately qualified presiding officer who has received appropriate training for the role (and was due to receive more training in September 2014). The force has processes in place to ensure that the presiding officer is independent of any person appearing before a misconduct hearing. HMIC heard evidence that the force works closely with staff associations to ensure transparency in the process, and that hearings have independent members to support the presiding officer. There is currently, however, no debriefing after hearings to assess any learning from the process. In addition, the force makes use of fast-track dismissal where appropriate.

## Quality assurance

The force audits decisions in hearings and meetings resulting from allegations of misconduct or unprofessional behaviour against officers and staff, but not sufficiently regularly. Audits are undertaken of gross misconduct investigations managed by the PSD which includes ensuring investigations are dealt with at the right level, and whether they are escalated or de-escalated appropriately. HMIC found that there is regular oversight and review by the DCC. In one case there was also independent oversight by the independent advisory group (IAG) in order to help ensure transparency through the process. More recently, pro-forma documentation has been introduced that ensures more extensive written documentation was available during the course of any investigation relating to severity



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assessments, interim reviews and final determinations. The training planned for September 2014 was due to include the chairs of misconduct meetings which may help to generate consistency in outcomes.

The PSD investigates all misconduct and gross misconduct matters relating to both police officers and police staff. Matters relating to any performance issues in respect of an individual are dealt with by the relevant department, with support from human resources (HR)

The PSD is currently working with staff associations to ensure that, when the results of misconduct hearings are reported, more information on the circumstances of the case is provided in order to raise awareness and act as a further deterrent to staff committing misconduct.

There is clear and consistent decision making on suspension, resignation and retirement during investigations. The force values staff, and there is an emphasis, wherever possible, on seeking to keep individuals who are subject to misconduct proceedings employed rather than suspended. Reviews are conducted by the DCC every 28 days and a clear rationale for the decision making is recorded in the file. Out of hours decisions on suspension are made by the duty 'gold' commander, and training on this role is part of a training package being developed for gold and silver commanders

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

### Investigating corruption

The force does not proactively identify threat, risk, and harm from corruption as part of a governance structure. The force responds to intelligence, which is risk assessed to determine the appropriate action and monitored through the National Intelligence Model (NIM) structures within the PSD. The force identifies vulnerable members of staff – either individuals or groups – but does not have a systematic process to ensure this is regularly monitored or carried out with regular use of the National Crime Agency (NCA) counter-corruption threat assessment. Whilst there is some awareness of the Transparency International Integrity Cycle, this is not used by the force. Vulnerability is primarily identified and assessed through the intelligence reports that are made to the ACU, and the force does not generally undertake this work proactively. The force 2014 PSD strategic assessment on financial hardship identified:

*“Notwithstanding the decline in the more severe cases of debt, it is conceivable that the current scale of financial hardship is greater than is apparent from the reported figures in view of the continuing pressure on wages and the reluctance on the part of some staff to disclose debt because of stigma or embarrassment.”*

but no follow up action was proposed.

### Recommendation

**Within six months, the force should ensure that it has the proactive capability to effectively gather, respond to and act on information that identifies patterns of unprofessional behaviour and corruption.**

The force vetting arrangements do not comply consistently with the national vetting policy. In 2015 a new vetting code will be produced by the College of Policing and the force will need to ensure it is prepared to comply with the conditions of that code. The vetting function is based within the PSD and overseen by the ACU. While vetting takes place for new recruits at the last stage of the recruitment process, and for contractors, it appears that once recruited, only some specific roles are subject to further vetting - for example, firearms officers. HMIC saw no evidence that vetting was undertaken for all promotions or, if done, was undertaken subsequent to the successful applicant being appointed.

The force monitors its IT systems and social networking sites and takes action when appropriate. The force has a social networking policy and it monitors networking sites. The force uses 3Ami (a commercial system) to monitor force IT. However, due to costs the force has reduced its auditing/monitoring function. Force social network sites are also regularly monitored and the force had access to software to enable this. A number of force Twitter

accounts have been closed recently because of inappropriate use. Control measures are also in place through the media department controlling how and when information is disclosed. Force access to the internet through the force network is closely controlled, although this was more difficult for standalone computers.

The force uses 'with cause' drug testing; however, the results were not circulated to the workforce. Random drug testing is not undertaken on the basis of cost, although its deterrent effect appears to have been disregarded in any rationale, notwithstanding that the 2014 PSD strategic assessment identified substance misuse as *'the weakest organisational control measure of all PSD policies'* and that an assessment of the scale of the issue could not be determined because of the lack of random and 'with cause' testing.

## Recommendation

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

The force seeks to ensure that organised crime group (OCG) investigations are not compromised, but does not do enough to ensure forthcoming operations are free from the risk of compromise. Staff working in the ACU no longer attend the force tasking meetings on tackling organised crime, although they do receive a list of those subject of the investigation for review. Efforts are made to ensure staff working on these operations are not at risk of being corrupted, and there is a process to raise concerns about possible compromise with markers placed on systems to enable effective monitoring. The head of the PSD acts as the authorising officer for covert activity undertaken by the ACU.

The force ensures the effective security of systems and exhibits, and has a policy which addresses the storage, seizure and disposal of property and exhibits. Strict property management systems were in place across the force. Property stores are in local stations although all exhibits are held centrally. Most documents are scanned electronically with some archiving of hard copy files and the PSD, including the ACU, uses Centurion (a dedicated IT system) to record this. The force also carries out transaction monitoring of the Niche records management system (RMS). The force has a 'clear desk' policy and members of the ACU sometimes carry out 'walk through checks' to ensure compliance; however, these have not been completed recently because of a lack of capacity.

## Intelligence

The force regularly, but not proactively, gathers actionable intelligence on corruption. The 2014 PSD strategic assessment sets out in some detail the sources of actionable intelligence. Following an increase in intelligence between 2012 and 2013, there was a fall in the ACU reporting of around 20 percent in the year ending March 2014. While some of the intelligence received by the ACU has come from confidential sources, staff working within this field have not been prompted about the importance of seeking intelligence about police corruption and the ACU staff have not considered attending courses for tactics (such as informant handling) to achieve this. The force has not undertaken sufficient proactive intelligence-gathering work as documented in the authorised professional practice on counter-corruption with, for example, the prison intelligence officers, community safety partners, e.g. children's services or domestic violence support groups. The force's ability regularly to gather actionable intelligence is constrained by capacity issues within the ACU.

The force has a tasking and co-ordinating mechanism through which corruption issues are considered, recorded, actions identified and reviewed. Recommendations from the 2014 report formed the basis of the control strategy that set the priorities for the PSD and the ACU. There is a fortnightly tasking and co-ordinating meeting during which all intelligence being worked on is considered. This is also scrutinised by the DCC. Intelligence gathered or received is analysed, graded in accordance with the national system for intelligence assessment, and developed and reviewed before being actioned.

## Capability

Although there is limited capability within the PSD and the ACU, there is access to necessary surveillance and technical equipment, and support not only within the force but across neighbouring forces. Intelligence received that cannot be progressed is stored on the ACU database but this is not cross-checked with fresh intelligence, so potential links may be missed. The 2014 PSD strategic assessment identified numerous intelligence and enforcement priorities. If these are adopted by the force, this would lead to more proactive demand and also a significant increase in workload for staff who were already seen to carry large workloads.

Findings from corruption investigations are reviewed and, where appropriate, published on the force intranet. Discussions are held with the PCC regarding wider publication to the public. HMIC found evidence that not all officers are aware of counter-corruption threats, for example, organised crime group members targeting officers. Officers and staff with financial problems have been identified as a potential issue of under-reporting for the force, and more could be done to promote and raise awareness of the support that is available to help minimise this risk.

# Recommendations

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- **Within six months, the force should ensure it carries out regular audits of integrity-related registers including gifts and hospitality, business interests, notifiable associations, expense claims, procurement activity and other records to identify potentially corrupt activity.**
- **Within six months, the force should ensure that it has the proactive capability to effectively gather, respond to and act on information that identifies patterns of unprofessional behaviour and corruption.**
- **Within six months, the force should ensure it has a policy on substance misuse and drug testing to identify and deter substance misuse. The force should communicate this to all staff.**