



Inspecting policing
in the public interest

Police Integrity and Corruption

North Yorkshire Police

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

North Yorkshire Police has benefited from the force command team's unequivocal commitment to developing a culture of professionalism and an expectation that staff will do the right thing for the right reasons. The chief officers wish to make the Code of Ethics an intrinsic part of the force's service to the public of North Yorkshire. Governance arrangements in the force are strong and the professional standards department has long-standing and experienced staff who are trusted by members of the force. However, although officers and staff in Police Standards Integrity Unit are both professional and capable, the unit does not have the capacity to be proactive.

Summary

North Yorkshire Police has benefited from the force command team's unequivocal commitment to developing a culture of professionalism and an expectation that staff will do the right thing for the right reasons. The chief officers wish to make the Code of Ethics an intrinsic part of the force's service to the public of North Yorkshire. Governance arrangements in the force are strong and the professional standards department (PSD) has long-standing and experienced staff who are trusted by members of the force.

There are areas for improvement in relation to transparency and publication, as well as audit of various registers, which are either out of date or unclear. Attempts have been made to broadcast organisational learning through a wide variety of communications media but officers and staff seek more interactive training in relation to ethics and integrity. The governance arrangements in the PSD and, the professional standards integrity unit (PSIU), are excellent, however. Although officers and staff in PSIU are both professional and capable, the unit does not have the capacity to be proactive.

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

Significant steps have been taken to bring up to date and promulgate policy effectively to the work force.

Work has been completed in relation to media policy and notifiable associations' policy but work regarding media contact management is ongoing.

There was still scope for further work and the wider publication of gifts and hospitality as they related officers and staff below chief officer or equivalent, as well as for independent oversight.

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 command team led by the chief constable demonstrates an unequivocal commitment to the Code of Ethics.

There is effective and active engagement between the police and crime commissioner and the force.

Staff demonstrate a sincere commitment to professional and ethical behaviour.

The submission and audit of chief officer expenses against diaries and receipts are robust and satisfactory.

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

PSD is well resourced in both capacity and capability, and operating under good governance arrangements. It contributes to the force performance board meetings with regular updates on PSD issues.

Staff expressed confidence in their PSD and a willingness to report wrongdoing directly to it.

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

There is robust tasking in place and intelligence systems in the PSD and professional standards integrity unit that are compliant with the national intelligence model (NIM). The quality of information regularly supplied to monthly force performance meetings by the head of PSD on behalf of the department is high.

The force handles intelligence well (albeit reactively) with excellent departmental governance arrangements.

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

On the fourth AFI, the work of monitoring secondary employment and business interests had been transferred to the PSD, but only recently and there were still gaps in the policy to be rectified.

On the fifth AFI, greater levels of training on integrity are evident but reliance has been placed on e-learning and communications updates, which some members of staff find confusing and onerous because they are expected to absorb the information during operational duty time.

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 a need for improved publication of business interests.

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

Data on gifts and hospitalities could be better publicised and other registers, such as the business interests register, should be brought up to date on the force website.

Succession planning is under way to ensure that PSD reflects the workforce it serves.

There are good levels of governance with clear monitoring and quality control in the handling of misconduct investigations.

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

The department is limited in its ability to be proactive because of staff numbers and its dependence on external assets for operational support.

The force demonstrates its willingness and capacity to learn from experience and has various means of engaging with the workforce through media, including e-mails, intranet and organisational learning bulletins, all of which are read and welcomed by its staff.

The force/constabulary in numbers



Complaints

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

502

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

20.1

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

15.7



Conduct

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

119

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

4.8

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

2.6



Business interests

Applications in 12 months
to March 2014

61

Approvals in 12 months
to March 2014

59



Resources

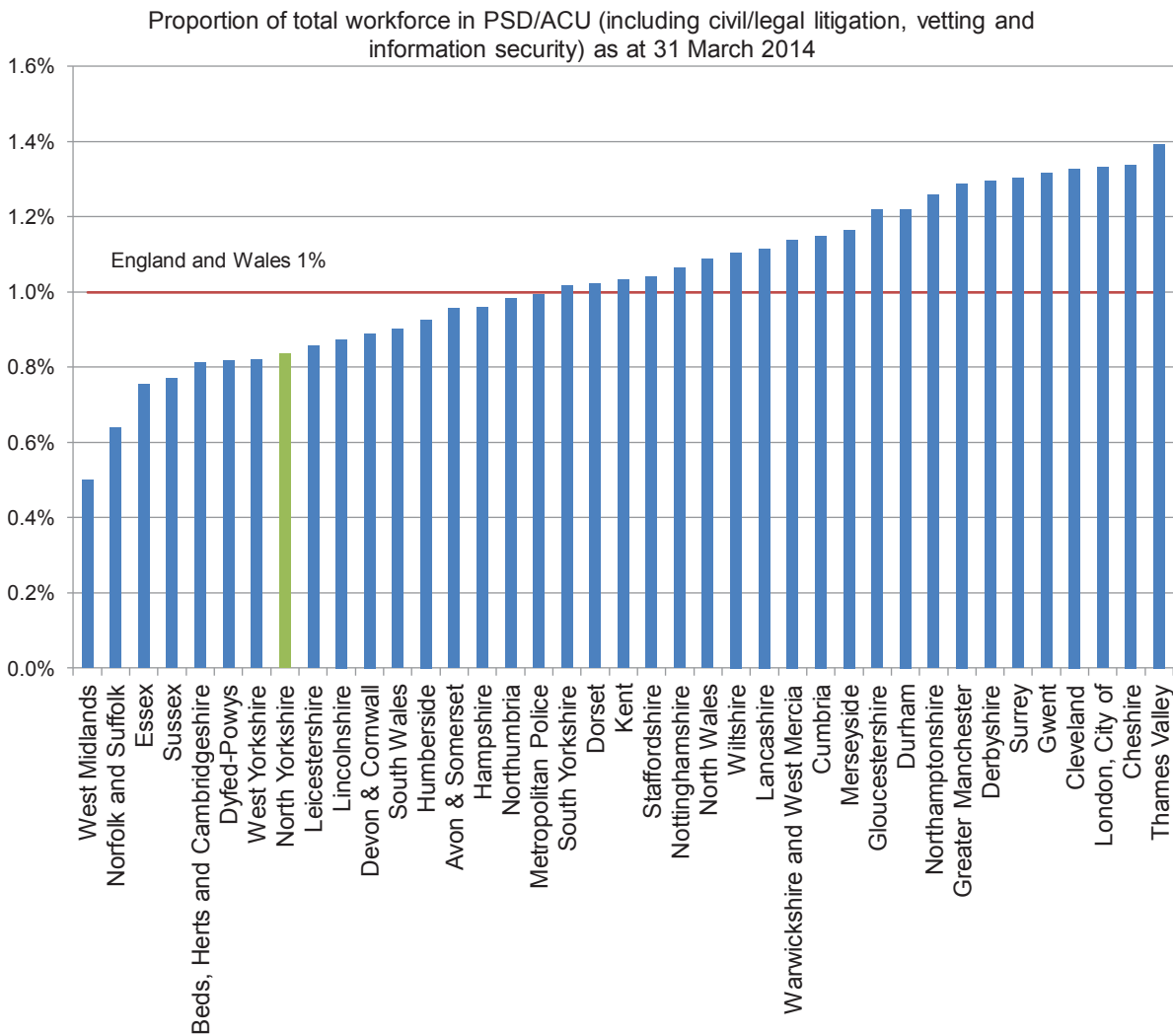
Proportion of workforce in
PSD/ACU

0.8%

Proportion of workforce in
PSD/ACU
– England and Wales

1.0%

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



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

Introduction

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

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

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

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

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

A national report on police integrity and corruption will be available at www.justiceinspectors.gov.uk/hmic/ in early 2015.

1 *Without fear or favour: A Review of Police Relationships*, HMIC, London, December 2011. Available from www.justiceinspectors.gov.uk/hmic/media/a-review-of-police-relationships-20111213.pdf

2 *Revisiting police relationships: A Progress Report*, HMIC, London, December 2012. Available from <http://www.justiceinspectors.gov.uk/hmic/media/revisiting-police-relationships.pdf>

3 *Code of Ethics – A Code of Practice for the Principles and Standards of Professional Behaviour for the Policing Profession of England and Wales*, College of Policing, Coventry, July 2014. Available at <http://www.college.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 five areas for improvement from the 2012 inspection report. These were to:

- (1) improve communication of updated policies relating to integrity and corruption;
- (2) ensure staff are aware of new policy on relationships with media;
- (3) develop a centralised gifts, gratuities and hospitality register;
- (4) develop a more robust and efficient process for dealing with application, grant and refusal of applications for secondary employment and business interests;
- (5) introduce training in relation to integrity and develop methods of checking that staff have been trained and understand the content.

With regard to the first area for improvement, the policy on the use of social media and social networking sites has been drafted, promoted and published to provide guidance to members of the force for use both on and off duty. The professional standards department (PSD) has met the lawyer responsible for civil disclosure in the force and the dissemination (following legal review) of clear policy information containing guidance has been agreed. The policy on anti-fraud, anti-corruption and confidential reporting arrangements has been regularly promoted through the force's organisational learning bulletin (OLB), email messages and circulation in the house publication 'In the loop' particularly the confidential reporting elements of the procedure. In addition, the force media procedure was also reviewed and updated in January 2013.

The policy on notifiable associations was updated in July 2013 and included information on associations and dealing with both media and private investigators. The updated procedures were similarly publicised to all staff as above, as well as being published on the force intranet. The force continues to emphasise maintenance of the highest professional standards, impartiality, integrity and ethical contact within all relationships. Its intention is to prevent wrongdoing by giving appropriate guidance to staff. It has therefore made good progress in this area.

On the second area for improvement identified in 2012, the force reported that the media procedure has been drafted, improved and publicised to provide guidance on relationships between members of the force and the media. The notifiable association procedure has also been improved and promoted in respect of relationships between members of the force and members of the media and private investigators. In addition, guidance to senior officers regarding contact with the media is currently being reviewed. The disclosure lawyer has produced guidance in relation to sharing data with partners. This should be ratified for implementation by November 2014.

On the third area for improvement identified in 2012, the force reported that the gifts, gratuities and hospitality arrangements had been clarified and improved and that the relevant procedures had been computerised in August 2012. The gifts, gratuities and hospitality register is published on the force intranet and the facility is available to allow members of North Yorkshire Police to complete gifts, gratuities and hospitality declarations at all times. The questions in the application for approval of an offer of a gift, gratuity or hospitality seek to identify any business relationships (past, present or future) between the donor, the force, or any media or private investigator involvement. The register and application procedure are overseen and managed by the head of the PSD. In addition, a process for cross-referencing donors with persons and organisations having a business or contractual interest with the force has been introduced and will be conducted in May and November every year. Improvements to the system continue to be made with arrangements for bi-annual checks between gifts, gratuities and hospitality records and procurement records now in place. Entries on the gifts, gratuities and hospitality register in relation to the chief officer team, superintendent and above (and police staff equivalents) are published on the force website in January each year.

In relation to the fourth area for improvement identified in 2012, the force's business interest procedure has been improved and its scope widened. Responsibility has been transferred from human resources (HR) to PSD. All applications for business interests and monitoring of potential vulnerability to corruption in this area are subject to annual review and are conducted in monthly batches of those business interests that are due for annual review in the month in question. The force reviews business interest applications that have been rejected if intelligence is received indicating that they may pose a risk to the individual or force's integrity.

The final area for improvement was the need for greater levels of training on integrity. The force reported that the anti-fraud, anti-corruption and confidential reporting arrangements procedure had been regularly promoted, particularly the sections relating to confidential reporting. The force maintains its emphasis on maintaining the highest professional standards in terms of impartiality, integrity and ethical contact in all relationships. Its focus is on preventing wrongdoing through guidance to its officers and staff. However, training has been mainly conducted through a national e-learning computer-based package known as NCALT. This can verify that staff have seen and read the information circulated but it cannot necessarily check that the contents have been understood. Members of staff with whom HMIC spoke in a number of reality-testing scenarios mentioned they would welcome more personally interactive sessions delivered by trainers or leaders who are able to open subjects for discussion and debate.

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 officer team has a committed intention to promote ethical and professional behaviour in the county. The chief constable, who has served in the Police Service of Northern Ireland where a Code of Ethics was developed some years ago, has articulated his aim to develop an environment where officers and staff are doing the 'right things for the right reasons'. During interviews with HMIC, chief officers talked about making the Code of Ethics 'part of the force DNA'. They also commented that this approach was one that should not be rushed. The chief constable has delivered relevant messages on personal interactions with senior officers through messages circulated on the force intranet and through other media such as the force's organisational learning bulletin (OLB), the online 'Message of the day' system, which appears on the force intranet home page when officers and staff log on, and another internet publication known as 'In the loop'.

Some officers and staff interviewed during our visit mentioned that they found the various messaging sources somewhat confusing, claiming there were too many internal communications, sometimes with no clear plan or theme. This feedback may be an opportunity for force leadership to consider the best means of ensuring that key messages are in fact prioritised and circulated effectively. However, it was clear from the various officers and staff spoken to by HMIC that all have a clear idea of the boundaries of unprofessional and professional behaviour and are able to demonstrate a good understanding of how conduct and behaviour affect the perception of both the public and their colleagues.

The force has a programme for reviewing all policies and procedures and advised HMIC that, when policies are reviewed, their compliance with the new Code of Ethics is also checked.

Chief officers expressed confidence that most leaders (including frontline line supervisors) lead by example, demonstrate personal commitment to ethical behaviour, promote and encourage it, and check that their staff understand what is expected of them in their professional and private life. HMIC found in reality checks and interviews with officers and staff that there is a good understanding of what constitutes professional behaviour, and that leaders (in particular, line managers) fully understand that the onus is upon them to lead by example. There is a climate in the force where unethical and unprofessional behaviour is generally appropriately challenged and where officers and staff are aware of their responsibility to report misconduct. Examples were provided to HMIC in which some senior staff had been challenged quite correctly by junior staff through the PSD. However, HMIC found in some junior staff focus groups that there is still some nervousness about confronting bad practice and unprofessional behaviour.

The force reported that the notifiable association procedure was updated in July 2013 and included information on dealing with both media and private investigators. The updated procedures were publicised to all staff through the OLB as well as on the force's intranet. HMIC confirmed that there is a clear policy outlining the obligation to declare any change in circumstances in an officer's or member of staff's personal associations and relationships. Officers and staff members are aware of their obligations in this regard. Notifications are reviewed, managed and acted upon appropriately by PSD, the head of which is also the force's vetting officer.

HMIC found that the National Decision Model (NDM) is in use at all levels in the force. It was reported that superintendents and chief inspectors use the model widely and frequently as part of their day-to-day work. Further, all officers, including constables and police staff, receive instruction on use of the NDM as part of their 'use of force' training. The topic is also a regular feature on promotion and other selection boards. As recently as July 2014, PSD also adopted the NDM for use in relation to severity assessments, conducted at the outset of any complaints investigation. The NDM also features in complaint investigation plans devised by investigators and agreed by the detective inspector and the head of PSD (HMIC saw evidence of this during its file checks). A senior officer also mentioned that it was expected that recruits to the force should receive instructions on the NDM as a fundamental part of their induction training.

The chief constable and deputy chief constable are attempting to speak for up to an hour to all entrants to the service personally; this is known as 'Day One – Lesson One'. The focus of these talks is the Code of Ethics and the standards expected of the force's police staff at all levels. This clearly sends out a positive message to all newcomers.

In focus groups officers and staff reported that the chief officer team portrays the standards expected of the force effectively, highlighting that the OLB identifies what is expected of them and the consequences if they are to transgress. Staff more closely involved with PSD matters felt that chief officer leadership is both clear and visible and that regular messages are disseminated relating to acceptable behaviour. These staff believed that there has been a significant change in the culture of the force that encourages staff to challenge and report unprofessional behaviour. Such staff also cited cases in which the chief officer team has acted promptly and transparently to address matters which have been brought to their attention.

HMIC found that chief officers provide regular information to the police and crime commissioner (PCC). This information takes the form of the PSD performance bulletin, supplemented by informal discussions on individual cases. The office of the police and crime commissioner (OPCC) indicated that the force provides sufficient and timely information especially in relation to critical incidents. A corporate communications specialist

has been recruited to assist both the force and the OPCC. This addition should assist in achieving consistency between messages from both organisations to the general public and improving communication between the two bodies, which at times will need to demonstrate independence as well as accountability.

HMIC found an effective and efficient system in place that ensures that integrity issues are actively monitored by chief officers. Monitoring is undertaken in governance meetings and monthly performance meetings attended by the PCC and chief constable, in which a PSD performance report is submitted detailing core performance data (in other words, the number of complaints recorded for the month and year to date, a comparison with the previous year, the lessons to be learned from them, complaint trends, numbers of referrals and appeals, proportionality of investigations, the distribution of complaints for investigation, the management of threats, substance misuse figures and the security of force assets).

There are also regular meetings between the deputy chief constable and head of PSD when individual cases are discussed and appropriate actions agreed upon.

There is clear evidence of timely interventions when necessary in relation to integrity and corruption matters.

HMIC found there are detailed policies and guidance clearly explaining the meaning of misconduct and unprofessional behaviour, and describing the acceptable boundaries. Some police staff are unaware that these policies cover their private, as well as their professional, lives. In general, however, policies are reviewed on a regular basis with those seen as key being prioritised and regularly revisited.

Understanding integrity

HMIC found that the force, through meetings among senior staff and surveys of officers and staff and the general public, is working to understand how integrity issues affect public trust. Chief officers reported that a regular meeting is held with chief inspectors and above in the force. There is also a six-monthly meeting held with all sergeants, inspectors and police staff equivalents. In addition, a report of a cultural audit was recently completed but is not yet published. Further surveys, including a superintendent's resilience survey and a planned staff well-being survey are to be carried out.

The force's gifts, gratuities and hospitality policy applies to all staff and officers. Guidance is provided on what is acceptable and what is not. There is an appendix chart with guidance for staff and officers on what to do. All offers are required to be recorded on a centralised electronic register held and monitored by the PSD. The force only publishes offers of gifts, gratuities and hospitality in respect of chief officers and staff equivalents.

HMIC found a generally good understanding of the contents of the policy and the need to notify offers that are declined as well as offers accepted. The presumption of officers and staff when offered a gift is to decline it politely. However, there are gaps in detailed knowledge and it was apparent that officers and staff are recording gifts and offers that do not need to be recorded under the policy. Chief officers are thought to be likely to prefer comprehensive reporting. Some members of staff asserted they would decline even the offer of a (non-alcoholic) beverage because they are not sure whether it is acceptable or not.

Recommendation

Within six months, the force should ensure that it has a policy that informs staff of the gifts and hospitality that are appropriate to accept and why. The policy should include the requirement to register the value and description of all gifts and hospitality offered, including those declined. This should be communicated to all staff.

As well as scope for greater promulgation of detail surrounding the policy, there is also an opportunity for the force to demonstrate greater transparency by cross-checking chief officers' diaries, expenses, gifts and hospitality with procurement records to ensure that there has not been any conflict of interest. At the time of inspection, the force highlighted that this practice was about to be implemented.

Applications by police officers to have other business interests are all formally recorded in a centrally held repository that includes details of whether applications are granted or refused. This has until recently been managed and audited by the human resources (HR) department. In July 2014, its management passed to PSD, where it was felt that a more robust and consistent approach to this area of potential vulnerability would be achieved. HMIC found that there are some anomalies in recording and management that should be addressed by the force. The main issue HMIC discovered was that only police officers and senior police staff (equivalent to chief officers) are required to apply or register business interests. The fact that most police staff are not currently obliged to notify, let alone apply for, business interests outside the police represents an omission that should be addressed. Not only are there working-time issues to be considered, but there may also be conflicts of interest in terms of the outside employment. This is especially relevant to staff with a public-facing role, such as police community support officers (PCSO).

North Yorkshire Police participates actively in, and conducts analysis of, the regional and national counter corruption advisory group forums to identify trends in relation to integrity issues. A problem-solving approach is taken to address the threat to the force from issues identified in local investigations. In addition, the head of the professional standards integrity unit (PSIU) also routinely monitors force systems, complaints and intelligence submissions to establish emerging trends and threats. The PSIU conducts an annual threat and risk assessment for consideration by those who are responsible for deciding on appropriate steps.

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

Misconduct and unprofessional behaviour

The force considers misconduct and unprofessional behaviour as a matter of course when making decisions concerning transfer to specialist roles and promotion for all positions. Although there have been no such cases in recent years, HMIC was assured that this would also be the case for applications for courses, such as the strategic command course, the pathway to chief officer rank and other accelerated promotion schemes.

All public complaints, regardless of whether they are made against police officers or police staff, are investigated by the professional standards department (PSD). However, in relation to matters of alleged misconduct by police staff, co-ordination of investigations is undertaken by the human resources (HR) department. The actual investigations are conducted by police staff managers, usually without any involvement from PSD investigators. Summarised details of each case are provided to the PSD for input onto their database.

The PSD handling of public complaints undoubtedly improves the timeliness of the investigations, which was found to be good, as well as their quality and consistency. Regular reports to the force strategic performance meeting, attended by both chief officers and the police and crime commissioner (PCC), indicate that the force leadership takes police integrity and corruption seriously. HMIC found that members of PSD, when first meeting complainants and assessing whether a matter might be suitable for resolving locally without the need for an investigation (local resolution), would draw up a document setting down the rationale for PSD's decision and what the complainant could expect to happen. It was said that this has had a significant effect in managing expectations, reducing appeals and increasing satisfaction among complainants.

There appears to be a disparity between the manner in which police staff and police officers were treated when it comes to sanctions. For example, in the course of the period under review, of the 18 people that had left the force as a result of disciplinary issues, 15 had been from the civilian staff side. One of the explanations given for this apparent disparity was the differing terms and conditions on which police officers and police staff were employed.

It is worth noting that PSD is almost entirely civilian with only one police officer, a detective inspector. The remaining members of staff are almost without exception retired male detectives who are, without doubt, extremely experienced and competent. However, the composition of the department is not reflective of the organisation it represents. The force is alive to this issue and positively promoting the department to encourage a more diverse workforce.

The force has robust and well-used means for reporting wrongdoing. These include a confidential email system and a confidential phone line direct into PSD. Clear guidance is available to staff, easily accessible on the intranet home page. There is also clear policy

information available to staff via the intranet. There is a clear intention from chief officers to develop a climate in which employees feel comfortable reporting wrongdoing and are confident that they will be supported. However, during reality checks, HMIC found a mixed view among frontline staff, with some mistrusting the so-called confidential email system and others fearing that they might be vulnerable were they to report wrongdoing. Others, however, expressed confidence and a willingness to 'do the right thing'. Reassuringly, many expressed confidence in PSD and its staff, stating that they would have no hesitation seeking advice through direct contact.

HMIC consider there to be scope for greater transparency in relation to some PSD matters and force registers. In terms of organisational learning, the force should publish, on a regular basis and probably through the organisational learning bulletin (OLB; a document that officers and staff like), details relating to disciplinary matters including findings in relation to misconduct and gross misconduct for both police officers and police staff.

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.

HMIC found that as a general rule the force refers cases appropriately to the Independent Police Complaints Commission (IPCC). The head of PSD commented that the force errs on the side of caution. It actively used the IPCC bulletin to disseminate learning through the OLB and also uses the methods described earlier to promulgate learning and advice to the workforce.

Professional standards training and resourcing

HMIC found that staff in PSD receive some training for their role, but not regularly. Although now no longer police officers, all the PSD staff have investigative training and experience. The head of PSD commented that there is a big gap in the market for PSD training. While the College of Policing runs bronze, silver and gold courses, feedback was that for those with any significant experience little benefit is to be derived from that training.

In the assessment of HMIC, the force PSD is sufficiently qualified to take steps to prevent corruption, with the majority of its staff having been qualified to the national standards known as the professionalising investigation programme (PIP) level 2 as detective officers before retirement and designated by the chief constable to exercise powers under the Police Reform Act 2002. Austerity measures have, however, had an impact on the proactive ability

and capacity of the department. The force does not have an anti-corruption unit; instead, there are only three staff in the professional standards integrity unit (PSIU), which is more of an intelligence development unit and limited in terms of proactivity.

HMIC found that misconduct hearings are structured so as to ensure transparency, effectiveness, efficiency and legitimacy, including through the use of an appropriately qualified presiding officer who is independent of the person being investigated. As the force has a relatively small workforce, the PSD has the capability to readily establish whether the officer has any prior contact with panel chairs and if any connection between them has been established, in which case they can seek outside assistance if required. Both assistant chief constables (ACCs) and superintendents have received disciplinary panel hearing training and the force has access to a list of established independent members that was created by the old police authority and more recently adopted by the office of the police and crime commissioner (OPCC). HMIC was advised that the force made use of fast-track dismissal where appropriate and were given examples where this had occurred.

Quality assurance

HMIC was impressed by the apparent level of oversight through the monitoring and audit of decisions in hearings and meetings resulting from allegations of misconduct or unprofessional behaviour against officers and staff. PSD compares and contrasts decisions to ensure consistency and is in a position to readily identify and, if necessary, take steps with regard to any comments on organisational learning from the presiding officer.

The head of PSD maintains a strong grip on quality and timeliness when it comes to complaints investigation and, while in the normal course of events investigating officers may make decisions about whether or not to escalate an investigation, any decisions that might be contentious are discussed and, if necessary, involve the deputy chief constable. The PSD performance report submitted monthly includes core performance data (as mentioned earlier).

PSD investigate from start to finish all complaints and misconduct in relation to police officers in the force area. Regular submissions to the force's performance board are evidence that there is an emphasis on both quality and timeliness in investigations. PSD has an effective ability to learn lessons from its own investigations and from various regional and national PSD forums. In addition, the force makes regular use of the IPCC bulletin. Learning is disseminated throughout the force by the means already discussed.

HMIC found clear and consistent decision making and policy on suspension, resignation and retirement of police officers during investigations. The deputy chief constable holds weekly meetings with the head of PSD, who briefs him on current casework and emerging issues.

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

Investigating corruption

North Yorkshire Police regularly, proactively and effectively identifies and manages threat, risk, and harm from corruption as part of its governance structure. The professional standards department (PSD) has adopted an approach informed by the national intelligence model (NIM) to the identification and management of risk from corruption. This takes account not only of the national corruption assessment (NCA) but also local and regional threats to making an overall strategic intelligence assessment (SIA) from which a control strategy is developed. PSD has a full tasking and co-ordinating process that supports good management and stewardship of the department. Workflows are managed well and emerging issues are identified early.

The force undertakes an annual strategic assessment to identify organisational threats and vulnerable staff and groups regularly and proactively. At the time of the inspection, for example, recent vulnerabilities had been identified including police community support officers (PCSO) through a national strategic assessment from the National Crime Agency. This activity at national level is supplemented locally in force forums when current trends are discussed between PSD and the professional standards integrity unit (PSIU) and colleagues from other units.

Vetting arrangements comply with the national vetting policy and identify corruption risks at the recruitment stage for officers and staff. Vetting is revisited on promotion to senior ranks or posting to sensitive or vulnerable roles. The force has found an increasing tendency among those who fail the vetting procedure to challenge it. While there is no right of appeal against negative determinations made during the vetting procedure, the force in practice has instituted an appeal process in which, in the interests of transparency, an explanation of the negative determinations is offered. The head of PSD, who has been designated the force vetting officer, believes risks should be revealed and managed during the vetting process. He therefore does not believe that an applicant should fail the vetting procedure just because a risk of vulnerability is uncovered. The mantra of the vetting procedure is 'a risk revealed is a risk reduced'. Vetting is also the first point at which a notifiable association of someone entering the force may be identified, recorded and managed under the relevant policy.

HMIC found a number of examples where the force effectively monitors force systems and social networking sites, and takes appropriate action. Access to information on organised crime groups is monitored. This includes checks on who accesses such information, what their role is and what their reason is. This monitoring has proven a useful deterrent: fewer people now misuse the system by accessing unauthorised information. There was, however, no evidence of the monitoring of social networking sites except when intelligence suggested that this was necessary.

HMIC found that, while there is robust monitoring of expenses incurred by senior officers and regular auditing of the gifts, gratuities and hospitality register, regular comparison between the relevant registers and other documents such as chief officers' diaries and procurement registers does not currently take place. The head of PSD has identified the need for greater scrutiny and is in the process of addressing this issue.

The force routinely conducts random drugs and alcohol testing among officers and certain support staff. Pre-employment screening is conducted on a routine basis. The force also conducts screening for two other forces in the region and recovers the costs from those forces. The force has both the capacity and capability to conduct 'with cause' testing (in other words, testing when intelligence has suggested that it is necessary) but this has seldom happened. The force does not publish results of random drugs and alcohol testing except in the quarterly performance report, which reaches a limited audience. The benefits of publishing results of both random and 'with cause' testing more widely are that the workforce will understand that it happens and thus avoid placing themselves at risk.

Recommendation

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

The force ensures that organised crime investigations are not compromised by the threat of corruption, but it does not take steps to mitigate risks to forthcoming operations unless there is intelligence to suggest that this is necessary. The lack of resources in the PSIU and PSD is in all likelihood the reason for this approach.

Recommendation

Within six months, the force should ensure it has effective processes to minimise the risk of compromise to investigations into serious and organised crime.

The force takes a proactive approach to the security of systems, exhibits and case papers. Evidence to support this has come from a report compiled by PSD following concerns about the security of exhibits, after two cases of seized cash were misappropriated. The lessons learned from these cases have resulted in changes to the practice and education of officers in relation to exhibit management.

Intelligence

The PSiU provides the force with good levels of analytical product. The data provided enable the monitoring of trends and developing threats as well as the provision of timely and appropriate information to enable decisions to be made and priorities to be assessed.

The force proactively seeks actionable intelligence on corruption from a variety of sources. Analysis is reported to the monthly performance management meetings. This identifies potential 'hotspots' of corruption, such as problematic police stations. Other issues have been highlighted and resolved in the force control room. Analysis further highlights potential vulnerabilities in areas where there are lower levels of supervision. Intelligence has further revealed possible problems in respect of the recruitment of special constables and other force volunteers. These are addressed by appropriate vetting, which can reduce risk.

PSD and the PSiU have a combined tasking and co-ordination system that complies with the NIM through which corruption issues are considered, recorded, actioned and reviewed. The tasking and co-ordination group meets every two weeks, with certain sensitive issues and covert operations discussed separately. HMIC was satisfied that actionable intelligence is acted upon and monitored through these structured governance arrangements. The force relies upon an SIA that informs its response to risks that have been identified, and its subsequent control strategy. Intelligence gathered or received is analysed, graded in accordance with the national intelligence grading process, and developed before being actioned through force, or regional, assets.

The force, mindful that the inappropriate recording of complaints can lead to misleading data, effectively identifies multiple suspects and multiple offences by a single suspect. This is achieved by recording both complaints and allegations; each person against whom wrongdoing is alleged is thus recorded. If there are multiple offences by a single suspect, these are recorded as separate cases.

Capability

The PSIU develops intelligence received well and is in essence an intelligence development unit. Although the unit, consisting of three staff, does not possess its own specialist covert capacity or indeed sufficient capability and capacity to seek intelligence proactively, it makes use of the force's covert assets or, if necessary, neighbouring force or regional assets as required. Chief officers are considering options to work in collaboration with a neighbouring force in the development of what might be properly termed an anti-corruption unit.

HMIC regards the management of performance that is in place for PSD as an example of good practice. There are regular tasking and co-ordinating arrangements, and regular submissions of PSD performance reports to the force performance meeting, attended by the PCC. The department is regularly monitored at force as well as departmental level, and this include the timeliness and quality of handling complaints, investigations, decision making, outcomes and appeals in addition to lessons learned. Evidence of this good stewardship was found in the range of files and intelligence products dip sampled (randomly selected) by HMIC during the inspection process.

The head of the PSD, who is also in charge of the PSIU, has a direct and regular reporting line to the deputy chief constable as well as regular structured meetings on a bi-weekly basis.

The force has a number of methods of ensuring that organisational learning opportunities are effectively exploited and disseminated to staff (these have already been mentioned). Local policing territorial commanders HMIC spoke with commented that they supplement these official documents as and when required by sending out advisory emails to staff and in face-to-face interaction. There are also regular operations and territorial meetings, as well as daily management meetings, where topical issues are discussed.

Having conducted an audit of PSD files and cases, HMIC was satisfied that cases are appropriately referred to the IPCC in accordance with the statutory guidance. A well-documented decision-making process is followed and the reasons why cases are not forwarded are recorded.

Recommendations

- **Within six months, the force should ensure that it has a policy that informs staff of the gifts and hospitality that are appropriate to accept and why. The policy should include the requirement to register the value and description of all gifts and hospitality offered, including those declined. This should be communicated to all staff.**
- **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 it has a policy on substance misuse and drug testing to identify and deter substance misuse. The force should communicate this to all staff.**
- **Within six months, the force should ensure it has effective processes to minimise the risk of compromise to investigations into serious and organised crime.**