



Inspecting policing
in the public interest

Police Integrity and Corruption

Nottinghamshire Police

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

Nottinghamshire Police has invested in a range of measures to promote and instil ethical and professional behaviour. It is effective in protecting the organisation from threats such as corruption and analysts identify potential vulnerability and trends. There is ongoing scrutiny of all investigations by senior managers within the professional standards department (PSD) although more robust recording of rationale in case files would be beneficial.

Summary

Nottinghamshire Police has invested in a range of measures to promote and instil ethical and professional behaviour. It is effective in protecting the organisation from threats such as corruption and analysts identify potential vulnerability and trends. There is ongoing scrutiny of all investigations by senior managers within the professional standards department (PSD) although more robust recording of rationale in case files would be beneficial.

The force has made good progress in ensuring that officers and staff are fully aware of the boundaries of unprofessional and professional behaviour. There is clear leadership from both the chief constable and the deputy chief constable (DCC). Staff interviewed by HMIC are aware of the standards required of them and staff generally feel confident to challenge and report wrongdoing.

Ethical and professional behaviour has been incorporated into most policies and procedures. The force has a rolling programme to review them as they become due. This ensures they will all reflect required ethical and professional standards. The new Code of Ethics will also be included over time to reflect the new ethical standards.

HMIC looked at a small sample of misconduct files and found that there is more limited recording of rationale to support decisions; for example, in the initial severity assessment and gate keeping decisions in criminal cases.

The force has a backlog of cases due to the time taken to complete some investigations, and there is a strong perception amongst the majority of officers spoken to that investigations take too long. Some cases are also delayed beyond the recommended number of days for local resolution. The force accepts that it has had a number of complex cases that have impacted on overall timeliness of investigations and has put measures in place to improve.

There is evidence that staff report unprofessional behaviour of others, either to a supervisor or to the PSD. However, staff have only limited understanding of the support available to them should they report a colleague for misconduct. The force needs to take action to address any reluctance amongst staff to report wrongdoing due to being unaware of the support available to them.

The force ensures that the counter-corruption unit (CCU) has sufficient capability and capacity to provide a proactive element. Staff within the unit feel that they are well resourced and have the capability to operate efficiently and effectively.

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

HMIC highlighted one area for improvement in the December 2012 report.

The force has made good progress. It has invested in social media monitoring software and provided guidance to officers and staff as part of the social media policy.

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 and visible chief officer leadership with the ‘PROUD’ principles being well established.

The force has developed a plan to embed the new Code of Ethics so that it makes sense to the workforce within its existing set of principles.

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

Investigations take too long and there is a backlog of cases.

Staff feel more confident to report misconduct and unprofessional behaviour. However, staff are not always clear on the support provided by the organisation.

Regular audits are conducted to ensure investigations and decisions are justified.

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

The force effectively manages threat, risk, and harm from corruption.

It proactively gathers actionable intelligence and the counter-corruption unit (CCU) has sufficient capability and capacity to operate proactively.

The force monitors force systems and social networking sites and takes proportionate action when appropriate.

The force/constabulary in numbers



Complaints

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

886

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

24.6

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

67

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

1.9

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

2.6



Business interests

Applications in 12 months
to March 2014

293

Approvals in 12 months
to March 2014

288



Resources

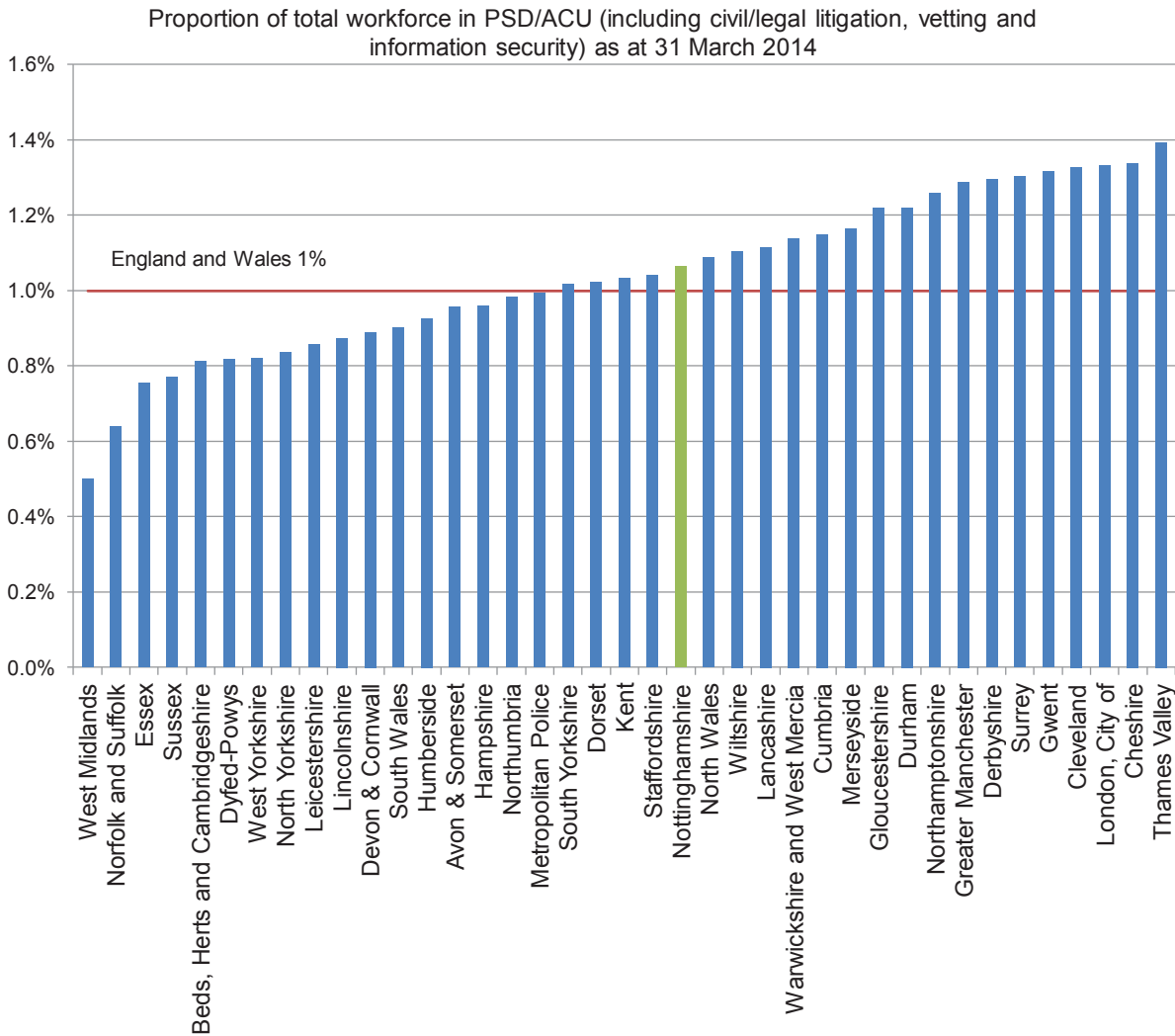
Proportion of workforce in
PSD/ACU

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*¹ we did not find evidence to support previous concerns that inappropriate police relationships represented endemic failings in police integrity. However, HMIC did not give the police service a clean bill of health. We found that few forces were actively aware of, or were managing, issues of police integrity. We also found a wide variation across the service in the levels of understanding of the boundaries in police relationships with others, including the media. Similarly, we found wide variation across the service in the use of checking mechanisms, and governance and oversight of police relationships.

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

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

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

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

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

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

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

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

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

HMIC highlighted one area for improvement in the 2012 inspection report:

- (1) The force need to do more to educate staff regarding the use of social media, and to monitor its use.

The force introduced a policy on how police officers and staff should behave on social networking sites and it was working on improving its ability to monitor social media. The force has made good progress and the policy makes a number of practical recommendations for police officers and staff. There are now dedicated staff who use specialist software to monitor social networking sites although the force acknowledges that it is difficult to monitor every account due to volume. In addition, there is training on the use of social media as part of a counter-corruption e-learning package.

The force has made good progress with this area of improvement.

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

Leadership and governance

The force has made good progress in consolidating professional behaviour across the force. There is clear leadership from both the chief constable and deputy chief constable (DCC) to create a climate of ethical behaviour, demonstrated by messages communicated through road shows, videos and blogs on the force internal website. Staff are knowledgeable on the well-established PROUD principles (Professional, Respect for all, One team, Utmost integrity, trust and honesty and Doing it differently), which are embedded in force behaviours.

The purpose of the principles is to empower managers and staff to challenge and report unethical, unprofessional behaviour or misconduct. The force has produced a DVD, called '*It started with a kiss*', which reinforces professional standards focusing on identifying sexual predatory behaviour and the support provided by the force for those who report this behaviour. Generally, most officers and staff are aware of the messages communicated by the chief constable and they recognise that the DCC leads on professional standards, including integrity and corruption and the implementation of the new Code of Ethics. She chairs a bi-monthly professional standards and integrity board (PSIB) and meets regularly with the head of the PSD and a senior member of human resources (HR). The senior team are seen as accessible and approachable by staff associations and respond to concerns positively.

Officers and staff are aware of the boundaries between unprofessional and professional behaviour and they understand how it affects both the public and their colleagues. The force publishes outcomes from misconduct investigations on the force website, and provides staff with a newsletter to reinforce what is and is not acceptable. '*Integrity Matters*', a monthly publication produced by the PSD, contains articles by the head of the PSD and case examples and was quoted by several staff as a source of useful reference on emerging issues and standards.

Ethical and professional behaviour have been incorporated into most policies and procedures. The force has a rolling programme to review them as they become due. This ensures they will all reflect required ethical and professional standards. The new Code of Ethics will also be included over time to reflect the new ethical standards.

Generally, leaders, including first line supervisors in Nottinghamshire Police, lead by example. Managers are encouraged to get to know their staff well and they check the understanding of their staff as to what is expected of them in their professional and private life during normal interactions. On an annual basis, an 'integrity health check' is completed as part of the personal development review process. This check looks at any changes in circumstances, for example notifiable associations, however, HMIC found that sometimes staff completed this check without a meaningful conversation taking place with their manager and did not understand where this information is held or how it is used.

There is good evidence to show that unethical and unprofessional behaviour is being appropriately challenged within the force. Numerous examples were provided to HMIC to demonstrate that this is happening, for example, thorough investigations into public complaints, internal audits carried out by the PSD and investigations conducted by the counter-corruption unit (CCU). Unethical and unprofessional behaviour is also appropriately challenged by supervisors and peers.

The force has established a working group that communicates the new Code of Ethics and there is a plan to bring together both 'PROUD' principles and the code in a way which is meaningful for officers and staff. The plan shows those actions that still need to be completed to implement the new code, with owners and timeframes for this activity, although the plan does not show any updates on progress. Some information on the new code is already on the force website and officers and staff explained they were aware of the new code from other media and social media sites (such as Facebook and Twitter) rather than through the force's own messaging systems.

There is a culture of challenge within the force and members of staff are aware of their responsibility to challenge and report misconduct or unprofessional behaviour. The force has an 'Integrity Messenger' confidential reporting line. There are indicators that staff are willing to report inappropriate conduct of colleagues but staff have only a limited understanding of the actions that the force would take to support a member of staff making such a report. It is important that any member of staff who reports misconduct is reassured as to the support they will receive during the investigation and subsequently. HMIC found some instances where supervisors referred instances to the PSD rather than dealing with the cases themselves.

There is a clear policy to declare any change in circumstances in police officer or staff member personal associations and relationships and the document also reiterates the 'PROUD' principles. Generally, officers and staff members are aware of their obligations; notifications are reviewed during the annual integrity health check process and acted on appropriately by the PSD. In support of this process, there is a single point of contact for the PSD in each division, where staff can seek advice, guidance and report associations or relationships.

The National Decision Model (NDM) assists decision-making and most officers have received NDM training. It routinely features in initial student officer and in the self-defence training which is regularly provided to officers. Most officers also know that the NDM should be applied when making decisions about the use of force, though its relevance in other situations is not as well understood. Some police staff members however, have not received any training about the NDM and consequently are unfamiliar with its application or how it should be used in conjunction with the national code of ethics.

Training on ethical and professional behaviour is provided through both classroom based activities and e-learning. Supervisors and managers have recently received training called 'shaping conversations'. These sessions focus on the force's expectations about how supervisors and managers act and lead on integrity, trust and honesty. Case studies are also prepared for all senior managers on a twice-yearly basis, recognising and responding to dilemmas which officers and staff may be faced with and they include sections on unconscious bias.

The force uses a range of training methods, however, staff and officers explained that some training on ethical and professional behaviour is delivered through an e-learning programme. Staff do not consider it a suitable approach to understanding subjective subject matter such as integrity and would prefer face-to-face training with discussion of these aspects.

Staff told HMIC the leadership by the DCC on integrity issues, including misconduct and unprofessional behaviour, is clear and visible. The DCC delivers messages encouraging positive behaviour. Staff had seen and could recall the important messages in a DVD produced by the PSD called '*It started with a kiss*' on sexual predatory behaviour by people who are in positions of trust and authority. The head of the PSD is very visible and key messages on integrity and misconduct are conveyed by her in the 'Integrity Matters' newsletter. Senior leaders also deliver messages to reinforce standards and values and the importance of challenging and reporting unprofessional behaviour is explained through online chats, the force website and 'meet the chief'; an on-line question and answer session.

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

The professional standards and integrity board, which meets every two months, has a wide membership and includes the deputy police and crime commissioner. Chief officers provide sufficient information to the police and crime commissioner (PCC) to enable him to understand any integrity issues (including misconduct and unprofessional behaviour). The PCC holds strategic governance meetings in public where the DCC and the head of the PSD attend to explain integrity matters affecting the force. The PCC conducts regular checking of complaints by carrying out random dip sampling of investigations and at the joint audit and scrutiny committee the head of the PSD provides information so that integrity issues can be considered.

Misconduct and unprofessional behaviour, including integrity issues, are monitored by chief officers at meetings that allow them to fully understand any emerging issues, and identify the need for action. The force has an integrity action plan and this is reviewed and progress monitored. The plan and meeting minutes show positive and timely action being taken with legal updates and IPCC (Independent Police Complaints Commission) outcomes and learning being incorporated into the plan. The DCC holds regular meetings with the head of the PSD and the CCU to identify actions and monitor the confidential risk register, which contains covert investigations. The DCC receives detailed updates on operations and is available to the head of the PSD on a more frequent basis if required.

Policies and guidance clearly explain the meaning of misconduct and unprofessional behaviour and describe acceptable boundaries, as well as what is expected of staff in their private and professional lives. There are policies covering all relevant aspects of conduct and behaviour which are stored on the force intranet, with many also being published on the force website. Policies are regularly reviewed and each policy has a publication and review date. Those checked by HMIC were found to be up to date, however, this inspection did not provide a comprehensive audit of the application of all of the policies that the force has in place. Staff said that they knew how to access these policies, and that the policies are clear. There is an action in the Code of Ethics implementation plan for all policies to be reviewed further to ensure they comply with the code.

Understanding integrity

The force has conducted some limited survey work to establish an understanding within the workforce on how integrity issues affect public trust; however the force has not conducted any specific public surveys to gauge feelings and perceptions of police integrity. The force acknowledges this gap and has organised focus groups and increased communications to improve transparency. The results from these are to be published on the force's website. The force does carry out an annual internal survey regarding PSD matters, but this has not included questions on attitudes and perceptions to integrity although other internal surveys have included questions on force values. The PCC also conducts public survey work and there are formal surveys of victims of crime. With the launch of the Code of Ethics, further survey work would have the benefit of identifying levels of understanding within the force.

Details of all occasions where offers of gifts, gratuities or hospitality occur are recorded in a centrally held register, which includes details of offers both accepted and declined. The register is published on the force's website and the most recent data is from January to May 2014. Force policy is to decline all offers of alcohol or cash, and the policy includes a notional maximum acceptable value for other offers of £25. Entries are monitored and challenged or investigated. The force has a clear documented policy in this respect and all staff interviewed by HMIC understood the requirements. Audits take place and results reported to the force information assurance board (FIAB), which is chaired by the DCC.

All occasions where officers and staff have applied for authorisation for secondary employment, membership of an organisation or a business interest are recorded in full by the force in a central database in the PSD and regularly reviewed to ensure that they do not expose the individual or the force to risk. The decision to accept or reject an application is made by the head of the PSD with devolved authority given to the head of vetting. However, there is no follow up with those who have had an application declined, although there is an expectation this would be done by the line manager through the annual integrity health check process. Similarly, there is no formal process in place where staff withdraw an application before it reaches the PSD to check and ensure that they had not taken on the business activity anyway. Withdrawals (as opposed to refusals) are not formally recorded on any CCU register to allow for formal ongoing checking.

Recommendation

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

The force carries out analysis to identify trends in relation to integrity issues, including misconduct and unprofessional behaviour, through the CCU. Cross checking of senior officers' diaries with expense claims, recorded offers of gifts or hospitality, and the procurement register does occur, but had only recently commenced at the time of inspection. The chief officer team also undertake some internal peer reviews of ethical dilemmas. Governance meetings are used to discuss trends and plan appropriate approaches and this often involves reminder messages through 'Integrity Matters' and on force orders.

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

Misconduct and unprofessional behaviour

Misconduct and unprofessional behaviour are considered in the decision-making process when there are applications for courses such as the senior police national assessment centre (SPNAC), the fast track development scheme, the transfer of officers to specialist roles and the promotion of officers for all positions. It forms part of the application process and HR are required to verify the information and provide details if there are any outstanding issues before individuals can progress to the next stage.

The PSD investigate all misconduct allegations against police officers and they undertake an initial investigation of police staff where there is a criminal allegation or external complaint. At the conclusion of any criminal investigation HR then complete the investigation file to enable a decision on any further discipline matters. 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 investigated and how sanctions are imposed. However, there is reduced oversight of HR investigations – which may not be criminally based – by the PSD, and officers and staff reported a difference in the outcomes imposed which was not wholly explained by the differences between police officer and staff conduct regulations.

Details of the investigation plan are generally recorded on logs on a database, which we found was not being used to its full potential with little use made of some information tabs which would assist an audit regime.

We conducted a review of a small number of PSD cases and this included looking at 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. In this review, HMIC found limited rationale being recorded using the NDM at key points, for example, at the initial severity assessment, severity assessment reviews, determinations and gate keeping decisions in criminal cases.

In addition, during initial severity assessments, cases were often categorised as gross misconduct with more limited rationale recorded on the log showing why that categorisation had been made. It is understood that some decisions are recorded in the investigator's note book, and not on the database. This makes conducting audits more difficult for the force to ensure there is consistency across cases. The force also has a backlog of cases due to the time taken to complete some complex investigations, with some cases delayed far beyond the recommended number of days for local resolution.

Recommendation

Within six months, the force should review the level of detail documented, as part of the rationale, and how and where this is recorded to enable information to be more easily retrieved for auditing purposes

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

The PSD tries to respond to reports of wrongdoing by staff in an effective and timely manner through a well-resourced and experienced team. However, particularly in relation to complaints enquiries, members of staff often feel that the process takes too long and is stressful. HMIC found that this backlog is partly responsible for how the PSD is perceived by officers and staff.

There is a good level of reporting of unprofessional conduct, however, HMIC found that staff lack confidence in the investigatory process and follow-up procedures. This perception also contributes to concerns about the support available to staff who make referrals that do lead subsequently to investigation. The force supports those who report misconduct by protecting the source of the referral and seeking corroborative information.

The purpose and functions of the PSD are not well understood amongst staff. The department is responding to this issue by leading focus groups across the force to improve the level of awareness about the PSD and address, in an open and transparent manner, any unreasonable perceptions held.

There are a number of confidential reporting mechanisms by which officers and staff can report wrongdoing, such as the integrity messenger (an anonymous email reporting process), and a confidential telephone line. Staff know the policy and the reporting process and are generally confident in reporting wrongdoing and using the reporting line. However, although the numbers of reports of wrongdoing are increasing some officers and staff reported that they were still not convinced that the system is confidential.

Offers of gifts and hospitality made to the chief officer team are published on the force website. Details of the outcomes from all misconduct hearings, including the date of the hearing, the rank or grade of the employee concerned, the type of allegation made are published. This demonstrates to the workforce the high professional standards expected. Secondary employment and business interests of all staff, including the chief officer team, are also published. This data shows the type of employment or business interest and includes any voluntary or charity work. Applications which have been refused show the rationale for the decision.

The expenses of chief officers and senior police staff are published.

There are regular quarterly meetings with the Independent Police Complaint Commission (IPCC) as well as the PCC to discuss misconduct issues and other related matters.

The force voluntarily refers a high proportion of cases to the IPCC. However, in a small sample of misconduct investigation files examined during the inspection, HMIC found four cases which were not referred to the IPCC but which should have been.

Nottinghamshire Police uses the IPCC bulletin to disseminate learning through the force intranet and the monthly PSD newsletter 'Integrity Matters' which also includes outcomes of misconduct hearings. Officers and staff found the newsletter informative and reported it improved their understanding about the boundaries of unprofessional behaviour.

Professional standards training and resources

The force ensures that staff in the PSD and the CCU receive regular training for their role. Current staff have considerable expertise and experience. The department has an appropriate training budget and no relevant training request has been refused. HMIC did not identify any skills gaps. Specialist resources are made available to support staff if needed. The force is part of the East Midlands regional training collaboration and this group has considered the issue of providing relevant regional training.

Succession planning (to make sure that the right staff are in place if someone leaves) takes place to ensure consistency in the PSD and the CCU, particularly for senior management roles. A recent example is the exchange of the temporary detective chief inspector in the CCU with an officer from the East Midlands Special Operations Unit (EMSOU), to facilitate future senior management positions. Most staff have worked in the department for a long time, which provides stability.

The PSD is sufficiently resourced and qualified to enable a proactive and preventative capability. The DCC has reviewed the resourcing levels within the PSD and is satisfied they are adequately trained and resourced. Staff are nationally accredited through the professionalising the investigation process (PIP) to Level Two and have completed anti-corruption bronze and silver courses.

Misconduct hearings are constructed to ensure there is transparency, effectiveness, efficiency and legitimacy. This includes using an appropriately qualified presiding officer, who is independent of the person investigated. Where required, the staff member will be accompanied by a representative from a staff association. The IPCC also attend hearings, which are tape recorded, to ensure transparency and legitimacy. The presiding officer is one of the two assistant chief constables with a member of the panel being an independent person. Training is provided for chief inspectors and those in equivalent police staff roles who preside in police staff proceedings.

The force considers the use of fast-track dismissal where appropriate and has used it in the past. There is a good process in place to consider the merits of its use in individual cases.


Quality assurance

The force does regularly audit decisions made in hearings or meetings which consider allegations of misconduct or unprofessional behaviour against officers and staff. However, the force acknowledges that there is no structured overall review and audit of the process to ensure transparency, although there are meetings between HR and the PSD to discuss cases.

There is auditing to ensure that investigations are justifiable and proportionate and are escalated or de-escalated appropriately. It was reported that cases are reviewed within the PSD. Where there is any significant change in the level of investigation, a reassessment is conducted and the severity risk assessment is adjusted accordingly. However, during a review of a small sample of files there was limited rationale applied to the initial severity assessment. In addition, interim reviews, misconduct determinations, initial decisions in criminal cases, suspension and reinstatement decisions were also limited in detailed rationale, although it was explained that these are often recorded in investigator's personal log books. However, one central place where they can be reviewed, assessed and audited would be beneficial.

The PSD tries to ensure the timeliness and quality of all investigations conducted in relation to officers and, where there is a criminal allegation, for police staff. Although the disciplinary process can take some time, officers are updated on progress every 28 days but cases are often taking too long.

There is a clear process to capture and record any lessons learned from the misconduct process and disseminate them to the workforce. These actions have an identified lead in the PSD and these are tracked to the most relevant department head in the force to update their staff and make changes where appropriate. The PSD lead is updated when the actions are completed and any additional lessons learned.



The force has a clear policy for decisions regarding suspensions, resignations and retirements during investigations for officers and police staff. This policy has recently been reviewed and it includes the process for considering, implementing and reviewing suspensions and how officers and staff can access welfare support. The head of HR is the appropriate authority for police staff matters and makes the decision on whether a member of staff should be suspended. These decisions are reviewed separately on a monthly basis by the DCC and the head of HR. Officer suspensions are also reviewed by the DCC and the head of PSD.

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

Corruption investigation

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

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

The force proactively and effectively identifies and manages the threat, risk and harm from corruption. Analytical work is carried out and priorities set as part of an annual threat assessment. Analysts complete monthly reports to re-assess emerging threats, such as systems misuse or criminal associations and the tasking and co-ordinating meetings are used to plan and prioritise work.

The force proactively identifies vulnerable staff and groups by using the NCA counter-corruption threat assessment. The CCU uses a preventative, early intervention management process. This is a proactive prevention method which aims to manage police officers and staff who have multiple complaints or conduct matters recorded against them. These officers and staff are identified by means of a scoring matrix which is used to assess the level and type of intervention required. Additionally, it can provide a supportive mechanism to mitigate any potential vulnerability identified.

The force collaborates regionally in relation to providing staff to the East Midlands Special Operations Unit (EMSOU). There are protocols in place for reactive investigations but no process for proactive work by the Nottinghamshire CCU in respect of Nottinghamshire staff posted to the EMSOU. There is also an issue where staff from more than one force might be involved in the same disciplinary investigation and subject to differing force policies while being investigated and so may be treated differently. The head of the PSD is aware of these issues and is working with regional colleagues to resolve these issues.

Recommendation

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

Vetting arrangements comply with the ACPO national vetting policy and are designed to identify corruption risks at the recruitment stage for officers and staff. Officers and staff are automatically re-vetted on a rolling cycle dependent on the level of vetting required. Once the re-vetting is completed the CCU carry out intelligence and familial checks for any

associations officers and staff may have. Vetting is carried out again on promotion or on posting to sensitive or vulnerable roles.

The force proactively and regularly monitors force systems and social networking sites (using a software product to do so) and takes proportionate action when appropriate. The force recognise it is difficult to monitor every social network account due to the large numbers and the restriction on access to personal accounts resulting from their privacy settings. However, they do regularly monitor open social network sites and other internet sites and the force has invested in specialist software which is used to monitor the use of the force's IT systems. Staff are frequently reminded of the dangers of personal information on social media as well as their responsibilities to use social media sensibly.

The force has recently re-started its random and 'with cause' drug testing due to a problem with how the tests were conducted. This problem has now been resolved. The force also uses intelligence-led 'with cause' testing to identify corruption although these measures only cover officers and not police staff. The outcomes of tests are not circulated to the workforce.

The force ensures that organised crime investigations are not compromised and mitigates the risks of compromise to forthcoming operations. A representative of the head of the PSD attends a monthly covert tasking and co-ordination meeting where ongoing investigations are discussed and prioritised for activity through the CCU. The force has access to EMSOU staff who are not Nottinghamshire officers, which can reduce the risk of investigations been compromised.

The force has strong processes to ensure the effective security of systems, exhibits and case papers. USB ports on computers are disabled, and swipe cards are used to access offices and only permit entry to those officers or staff who have a legitimate requirement to enter the PSD building. Physical security is good to prevent the unauthorised viewing of sensitive material.

Intelligence

The force publishes a counter-corruption strategy. Comprehensive analysis is carried out to identify corruption trends. Analysts have access to the draft Authorised Professional Practice (APP) to ensure they comply with the practice guidance. Grading of intelligence is carried out using the national intelligence model grading system.

The force regularly and proactively gathers actionable intelligence on corruption. Intelligence gathered or received is analysed, graded and developed appropriately by analysts within the CCU before being allocated for further investigation. This is an effective process with no backlogs. This intelligence is monitored through a structured planning and prioritising process within the CCU and through the daily meetings and the tasking and coordination process.

The PSD has both the capacity and capability to identify effectively multiple suspects and multiple offences by a single suspect. Examples provided to HMIC and file reviews found thorough development of intelligence and investigations.

There are sufficient resources to deal with the flow of intelligence, although the pro-active steps the CCU takes to gather evidence can sometimes result in additional analysis and investigation being required.

Capability

The CCU has access to specialist staff when required. Such requirements are prioritised and identified through the tasking and coordination process. Support comes from the National Crime Agency (NCA), the force's technical support units, telecoms data specialists and digital investigators. The force is also part of the established EMSOU and therefore has access to a variety of other resources including those for covert operations.

The force ensures that the CCU has sufficient capability and capacity to provide a proactive element. Staff within the unit feel that they are well resourced and have the capability to operate efficiently and effectively.

The performance of the PSD and the CCU is regularly monitored at fortnightly meetings. These meetings cover issues including the timeliness of intelligence enquiries and gross misconduct and misconduct cases. The quality of complaints handling, investigations and decisions are assessed through dip sampling.

The head of the CCU has a clear and direct reporting line to the DCC with access, whenever it is needed and they can also approach the PCC if the need arises to raise concerns about the chief constable. Other members of staff in the CCU feel they have good access to the head of the PSD and the DCC if required.

The force ensures that lessons are learned and disseminated to officers and staff. The PSD publish lessons learned on the intranet and through the monthly newsletter '*Integrity matters*'.

Recommendations

- **Within six months, the force should ensure that any secondary employment or business interest applications which have been declined or withdrawn are followed up on to ensure compliance.**
- **Within six months, the force should review the level of detail documented, as part of the rationale, and how and where this is recorded to enable information to be more easily retrieved for auditing purposes**
- **Within six months, the force should ensure it has sufficient capability and capacity to enable it to record and conduct timely and proportionate investigations into public complaints.**
- **Within six months, the force should work with the EMSOU to ensure that there are proactive counter-corruption processes in respect of all staff posted to the EMSOU.**