

Police integrity and corruption 2014

Terms of reference

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1. Purpose

- 1.1 Her Majesty's Inspectorate of Constabulary (HMIC) inspects policing in the public interest.
- 1.2 This inspection has been commissioned by the Home Secretary following several revelations of wrongdoing by police and specifically police leaders, together with previous HMIC reports on the subject. The Home Secretary has further requested, in a letter to HMCIC dated 6 March 2014, that the inspection specifically examines each force's capability in relation to anti-corruption, including force professional standards departments (PSD), and the capability of forces to gather regular actionable intelligence on corruption matters.
- 1.3 There are a number of considerations for this inspection, the starting point being integrity concerns raised by the Home Secretary. These were referenced in the Home Secretary's statement to Parliament and subsequent letter to HMIC on 12 February 2013. For ease of reference these are replicated below:

"The new measures are designed to ensure the highest standards of integrity in the following ways;

- ***ensuring the police become more transparent in their business;***
- ***setting out clearer rules for how officers should conduct themselves;***
- *opening up the top ranks so policing is less at risk of professional insularity;*
- ***ensuring that officers who do wrong are investigated and punished;***
- *and*
- *ensuring that the organisations we ask to police the police, like the IPCC, are equipped to do the job."*

The bullet points highlighted in bold are the three that we are principally interested in for the purposes of this inspection. These are: transparency; clarity (and understanding) of rules around professional conduct and standards; and (looking for) investigating and punishing those that do wrong.

- 1.4 HMIC has conducted a number of inspections in the last two years which will be used to underpin this work:

1. *Without Fear or Favour* published December 2011. This inspection identified significant inconsistencies in the way forces and police authorities managed relationships, with little governance and oversight in place. There was a real lack of clarity on boundaries and on the appropriateness or otherwise of gifts and hospitality. Checks and balances in these areas were generally found to be weak.
2. *Revisiting Police Relationships: A Progress Report* published December 2012. This found that while some progress had been made, particularly by putting in place 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 is serious about managing integrity issues. In particular, our findings showed that more needs to be done by the police service to establish and intensify high degrees of conscious self-management of integrity issues.

3. *Review of the Capability and Capacity of Police Professional Standards Departments* (unpublished). This was prepared in response to the Home Secretary's commission in her letter of 12 February 2013. This report was not published.

1.5 The first two of the above inspections identified the importance of leadership in promoting ethics, standards and integrity as well as in ensuring that systems and processes are in place to enforce the standards.

1.6 The purpose of this inspection is to determine, on behalf of the public, whether each force's workforce acts with integrity.

Overarching Question:

Does the force's workforce act with integrity?

Under-pinning questions:

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

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

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

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

2. Inspection approach

2.1 Inspection activity in forces will consist of three distinct phases:

a) *Pre-fieldwork phase*

This will include a requirement for forces to provide documentary details of policies and strategies to identify any documentary evidence of systems and processes. It will also include a requirement for forces to provide relevant data to inform the fieldwork phase.

b) ***Fieldwork phase***

Fieldwork will be broken down into:

- Interviews of relevant staff, focus groups, reality testing, and a dip-sample of a small number of professional standards department files. The current planning assumption is that the fieldwork phase will be conducted by a team made up of staff from the regional HMIC office, and at least one specialist member of staff provided from the core project team or a suitably experienced associate inspector. Peer inspectors from forces and Transparency International UK will also be used where possible.
- Survey work. This will consist of a survey of police officers and police staff; consideration will also be given to surveying members of the public.

c) ***Post-fieldwork phase***

- Quality assurance of reports will be conducted centrally by the Specialist Staff Officer with specialist support and internal moderation led by the Senior Responsible Owner. The current planning assumption is that HMIC will make judgments, but the detail of this has yet to be finalised.
- HMIC will provide a detailed feedback report for each force visited. Individual force reports will be provided to forces and police and crime commissioners, but will not be published (although they will be available via Freedom of Information Act requests).
- In addition, HMIC will produce a national report on corruption drawing out the key issues. The report will contain judgments and observations reflecting strengths and areas for improvement enabling all forces to improve their effectiveness and capability in this area.

3. Methodology

- 3.1 HMIC will write to all chief constables/police and crime commissioners to introduce the police integrity and corruption inspection. The business area lead, Chief Constable Jacqui Cheer, is already aware of the proposal and it has been published in the HMIC business plan.
- 3.2 A project board chaired by the Senior Responsible Owner has been set up to oversee the progress of the project. The board will meet every two weeks at the commencement of the project, every month through the fieldwork phase, and every two weeks during the post-fieldwork phase.

3.3 The pre-fieldwork phase will include a data request to forces, updating previous requests made for *Revisiting Police Relationships: A Progress Report* in 2012 and the *Review of the Capability and Capacity of Police Professional Standards Departments* in 2013. Relevant policy documentation has also been requested ahead of the fieldwork.

3.4 The fieldwork phase will consist of:

- Interviews and focus groups of relevant staff;
- Dip sample of a small number of PSD files to determine the appropriateness of actions taken i.e., level of supervision and referral to the Independent Police Complaints Commission; and
- Policy document review

3.5 The following are expected to be interviewed:

- Chief constable or chief officer lead
- Head of PSD
- Head of procurement
- Head of specialist/major crime
- Head of communications/media
- Head of information management/data protection
- Head of intelligence
- Head of human resources
- Police constables, sergeants, and police staff focus group
- Detective constables, detective sergeants and specialist squads/PSD focus group.

3.6 The inspection team will need access to the force's gifts and hospitality register and may also require access to individual officers' diaries to identify meetings with outsourced agencies.

4. Staffing

4.1 Each inspection team will consist of at least four members of staff, including one staff member from the relevant region (Lead Staff Officer or Staff Officer), and one member of the core inspection team, reinforced by suitably experienced members of the national team and/or associate inspectors and peers.

5. Fieldwork schedule

5.1 For each force, three days were allocated for completion of the fieldwork.

Forces were notified of the inspection in an email sent during May 2014; the inspection commenced in June 2014. Following completion, the findings were debriefed in force to allow for initial comment.