



Inspecting policing
in the **public interest**

Police Integrity and Corruption

Staffordshire Police

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

Staffordshire Police has made some progress since our 2012 revisit. There has been sustained and effective leadership by chief officers and they have promoted a culture of integrity. Officers and staff know that high standards are expected of them but their understanding could be improved with practical guidance from supervisors. The force has effective systems in place to monitor use of force information and respond to intelligence about unprofessional behaviour but all staff need to be confident they can report wrongdoing.

Summary

We found strong leadership from the chief constable and as a result staff we interviewed are aware of the standards expected of them and the importance of the new national Code of Ethics. The force has recently launched a programme to encourage greater engagement between staff and officers and their supervisors.

The force has a comprehensive range of policies in place, which are supported by more detailed procedure documents. Some officers do not fully understand the constraints imposed on the use of social media; secondary occupations and the offer of gifts and hospitality, and this has created uncertainty in reporting inappropriate behaviour or misconduct.

Generally, we found the processes for monitoring compliance with these areas to be robust and regularly audited to ensure consistency and fairness. The force should, however, check the diaries of senior officers in order that appropriate assessment and monitoring can be exercised regarding contacts and engagements to ensure that opportunities to identify threat and risk are maximised via a transparent process.

The performance assessment unit (PAU) has brought together the HR department, the professional standards department (PSD) and the training department to co-ordinate activity and work together to direct investigations effectively. The anti-corruption unit (ACU) remains separate.

The force actively examines information and intelligence from a broad range of sources in an innovative and productive way; triggering timely interventions and early identification of staff who may be at risk of wrongdoing or vulnerable to corruption.

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

HMIC's 2012 revisit, found that the force needed to improve its understanding of how staff should deal with the media. The force has made good progress and staff now have a better understanding and are supported effectively by the force's media department.

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 effective leadership and communication from chief officers promoting the national Code of Ethics. Chief officers and the office of police and crime commissioner (OPCC) have introduced an 'ethics and transparency audit' panel to guide policy.

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

The force has effective monitoring systems in place to identify unprofessional use of force information. The force uses a matrix of different indicators to risk assess individual members of staff who may be vulnerable to corruption. The force is effective in developing intelligence and its response when misconduct is reported.

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

The force has recently increased counter-corruption and investigation resources and the monitoring of force computer systems and intelligence have been used effectively during innovative operations to identify information misuse and predatory behaviour.

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

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

Staff know that standards will be enforced and they are willing to report wrongdoing. However, the force needs to improve understanding of ethical conduct and ensure supervisors engage with their staff to provide practical guidance, and monitor those more vulnerable to corruption.

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

There are confidential reporting methods in place which are used by staff to report wrongdoing and the force makes use of past cases to promote the lessons it has learned. Significantly, the force has combined its professional standards and human resources departments to provide an integrated approach in managing people and professional conduct.

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

The force has carried out risk analysis to identify counter-corruption needs but further work is required to ensure proper governance and proactivity. HMIC found counter-corruption officers were trained and effective. Some further preventive steps, including cross-referencing databases, are required to identify potentially corrupt links.

The force/constabulary in numbers



Complaints

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

304

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

9.9

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

77

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

2.5

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

2.6



Business interests

Applications in 12 months
to March 2014

185

Approvals in 12 months
to March 2014

185



Resources

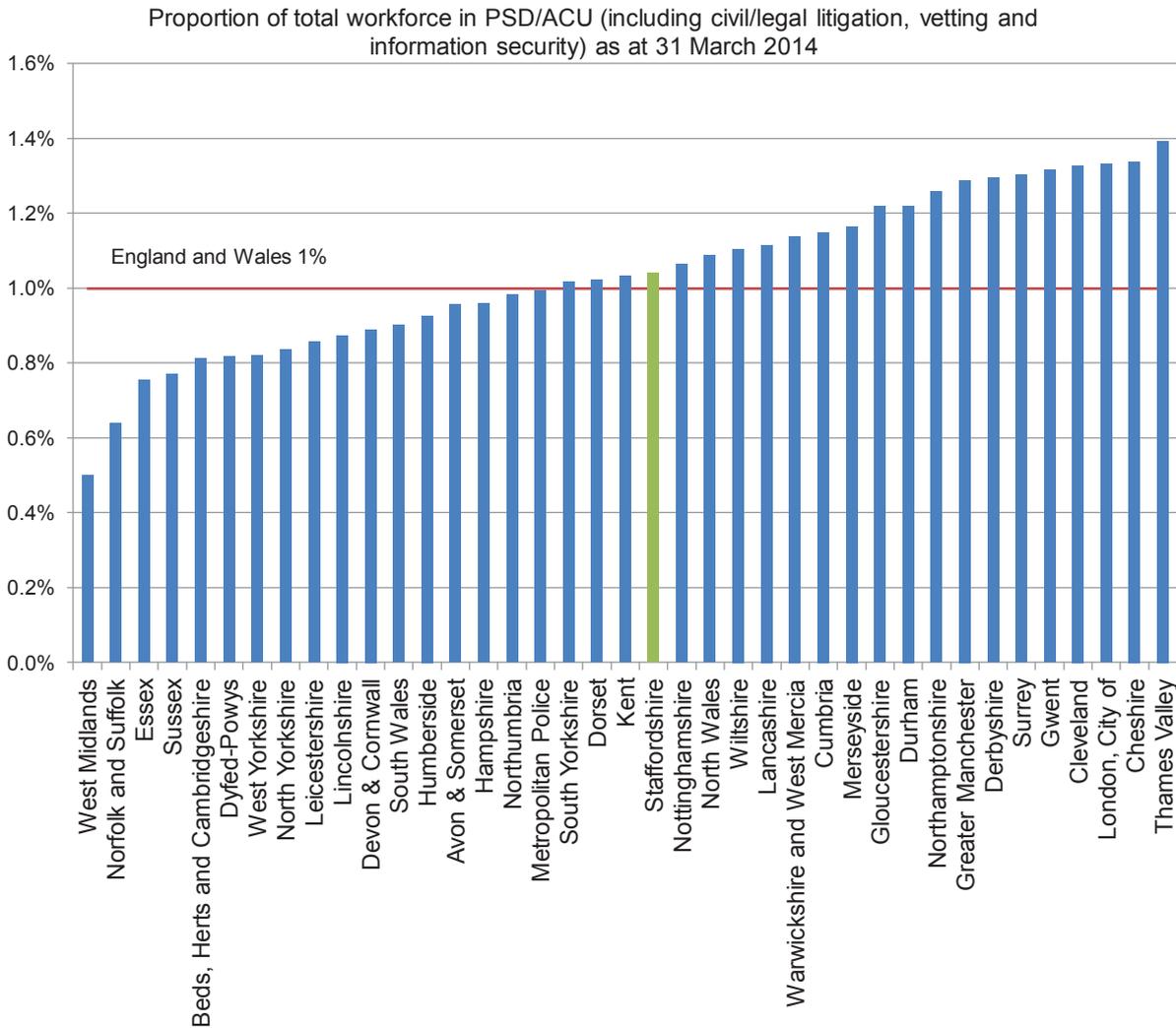
Proportion of workforce in
PSD/ACU

1.0%

Proportion of workforce in
PSD/ACU
– England and Wales

1.0%

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



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

Introduction

During HMIC's review of police relationships, published in 2011 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?

During the inspection of Staffordshire Police in 2012, HMIC found the knowledge and confidence of operational staff in dealing with the media was limited. During this inspection, we found good progress had been made. Officers and staff are aware of force policy on contact with public media representatives and confident of support from the force's media department, to whom most enquiries are referred.

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

From April 2014 onwards, the chief constable hosted a programme of informal presentations on the new national Code of Ethics delivered to staff in one hour sessions at local police stations. A separate programme of presentations to frontline supervisors was undertaken in 2013, briefing them on the revised force structure and corruption issues, as well as performance and attendance management. The chief constable intends to conduct a further series of supervisor briefings later in 2014. The presentations include case studies from a recent investigation targeting officers who abused their position to enter into sexual relationships with victims of crime. The presentations include examples of behaviour that supervisors should take notice of and instructions on when they should intervene.

The force has linked ethics and conduct with the Staffordshire 2013-18 policing plan which builds on published information and messages over recent years about ethical challenge. In addition to communicating through road shows, video presentations and emails, chief officers have visited departments to check and discuss the work that is being done to support the policing plan.

HMIC found clear evidence that the force's publication of important messages, especially those concerning inappropriate contact by officers with victims of crime, were understood by staff and their supervisors and that the chief constable's presentations were effective in developing awareness. A positive outcome from these briefings was a temporary increase in reports to the PSD by staff using the confidential lines of communication.

During the inspection, HMIC made two unannounced visits to police stations in two areas and found most staff knew about the constraints on their use of social media and the misuse of police information systems. There was also a clear awareness of the requirement to report secondary occupations. HMIC found that most staff knew clearly the expectations of chief officers and the importance they placed on ethical conduct.

However, some officers and staff were uncertain about the practical implementation of these principles and the requirements of some force policies, including the requirement to report offers of gifts or gratuities even when they have been refused. There was evidence that, while the general emphasis on ethical conduct and personal responsibility was very clear, staff had received little guidance from their supervisors or 'worked examples' of the situations that might confront them at work.

Leadership briefings on integrity issues have not taken place for all supervisors, but the force has emphasised to them their personal responsibility for leadership and challenging wrongdoing. It was clear during the inspection that those supervisors who had attended the briefings were significantly more aware of their role in identifying officers who might be

abusing their authority to establish inappropriate relationships. The briefing process has therefore succeeded in this regard.

What was less clear, however, was the extent to which supervisors have gone on to engage directly with officers and staff to check their compliance and explore their ethical concerns, providing practical operational guidelines where necessary to ensure sufficient understanding of professional boundaries and force policy.

HMIC found that some officers were, as a result, confused. Examples were provided to HMIC of managers at times not challenging corporate offers by fast food chains and at other times doing so. Although these decisions may have both been appropriate in their separate circumstances, members of staff identified that there were inconsistencies. The force needs to ensure effective explanation at all operational levels of the practical applications of ethical decision making.

Recommendation

Within six months force, should ensure that it has a policy which 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.

Historically the force has also operated a bulletin board or discussion group on the force intranet called 'grape vine', where staff were able to post queries, generate discussion and ultimately receive researched answers to issues from managers. This system was seen as useful by staff in seeking information. More recently, the system has changed to 'grape vine live', which operates in a similar way but only for limited periods. Officers and staff recognise that it provides more immediate answers but some preferred the earlier system.

The managers and supervisors whom HMIC interviewed felt that officers and staff would be willing to challenge inappropriate behaviour. HMIC, however, found only limited evidence from the staff interviewed during the inspection that individuals would be readily challenged by their peers. Similarly, it was not clear that officers or staff would be confident in reporting misgivings about the conduct of colleagues, especially their supervisors, except in obvious and unequivocal situations.

Several staff interviewed during the inspection expressed concerns about the lack of support they would receive if they were to report misconduct and an investigation or proceedings ensued. This concern resulted from the fact that their line managers (from whom they would most naturally expect support in such circumstances) frequently changed, and the probability that investigations and misconduct cases would take a long time to resolve. HMIC noted that the force had policy guidance setting out principles of support for

staff reporting misconduct or potential miscarriages of justice but awareness of the policy or its application among staff and managers was very limited.

To enable confidential reporting of unprofessional behaviour, the force operates a confidential telephone and voicemail reporting line as well as an intranet-based system known as 'bad apple'. This allows messages to be forwarded to the ACU anonymously but also provides opportunity for a two-way dialogue through use of anonymous log-in details. The process preserves anonymity for the employee making the referral, as the system generates a log-in password which can subsequently be used to access messages placed on the system by the investigator.

The 'bad apple' system was introduced in 2011. In 2012 there were 22 referrals and in 2013 there were 30 referrals. There had been 9 referrals so far in 2014 at the time of the inspection.

HMIC found evidence of some reluctance among staff to use these systems to report misconduct. It is important that all employees have trust in the reporting methods provided by the organisation and confidence in the support they will receive where they report unprofessional behaviour. It will be necessary for the force to re-establish confidence among all its staff in the anonymity of the 'bad apple' system and to re-emphasise the support that will be provided for officers and staff who do make referrals.

HMIC found that officers and staff welcomed the direct contact and clear messages provided during local visits by the chief constable and chief officers but the force needs to promote more effective understanding of the personal responsibilities of officers and staff under the Code of Ethics and to reinforce confidence among staff to challenge and report unethical and unprofessional behaviour.

Recommendation

Within six months, the force should ensure all staff understand the support mechanisms available to those individuals reporting misconduct.

Understanding integrity

The Staffordshire policing plan of 2013-18 refers to the core values of honesty, impartiality, fairness and respect. The force's approach has been to incorporate ethics as a fundamental element within the policing plan rather than a separate issue for training. A working group, led by a chief superintendent, has been set up to develop and implement internal communications on the Code of Ethics. Meanwhile chief officers have promoted the policing plan and recent organisational changes during road shows and the chief constable has

underlined the importance of ethical conduct in a programme of well attended local briefings to staff.

The office of the police and crime commissioner (OPCC) has established and is continuing to develop an ethics, transparency and audit (ETA) panel which meets quarterly. It is beginning to examine thematic areas such as crime recording, the use of forensics at burglary scenes, and the range of information being provided by the force to enable oversight of business processes. Following a thematic review by the ETA panel, an independent panel member has prepared a report which was forwarded by the PCC to the chief constable.

The OPCC cited this recent example of its ability to scrutinize and challenge the force: Following a football match at which there had been some public disorder, the force was required by the police and crime commissioner (PCC) to provide an operational debrief which was subsequently published by the PCC. There are plans by the OPCC to extend the ETA concept to include similar local panels comprising independent or elected members who can oversee policing work in progress and challenge it where necessary. The PCC also meets with frontline officers to identify and understand issues affecting the force.

The heads of department across the force are invited to attend the ETA meetings to represent their specific area of work, in line with the work plan of the ETA panel, which also consider issues of public trust. The ETA panel has examined the possibility of wider public engagement by the force through public media channels but it has not so far commissioned any surveys or similar analyses to understand public perceptions around integrity issues affecting the force.

The force has a comprehensive range of policies in place, which are supported by more detailed procedure documents where necessary. HMIC found the policy guidance documents were clear and provided both necessary explanation and relevant examples.

The procurement department has access to the central register of reported associations and can therefore make checks against police officers or staff who may be involved in the procurement process. For large contracts, the force employees involved are also expected to declare any interest.

HMIC found this self-declaration process was seen as the primary safeguard. It was not clear that intelligence systems are being proactively and routinely checked by the ACU or the procurement department to ensure integrity and transparency in the procurement process. This gap reflects a need by the force to establish more effective preventive measures which are carried out routinely to identify potentially corrupt associations.

Recommendation

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

The force operates an effective electronic reporting and central recording system for gifts, gratuities and hospitality. Members of staff offered gifts or hospitality generate and complete a report via the force intranet which is automatically forwarded to the HR unit within the performance assessment unit, (PAU) which has responsibility for managing records and monitoring. At the same time, the system produces a notification which is forwarded to the recipient's supervisor. The offer is then subject to approval by line managers and ultimately the HR unit manager, who has final authority to grant or decline approval. Entries are examined weekly and decisions audited by the ACU. New cases and decisions are reported monthly for scrutiny by the PAU co-ordinating group chaired by the assistant chief constable (ACC).

It was clear during the inspection that officers and staff used the system to report offers where it was likely they would be approved for acceptance, either by the individual or on behalf of the force for charitable disposal. It was also clear that the system was being regularly updated and consistently managed. Examination of the central records and interviews with staff, however, revealed limited evidence that offers that individuals themselves declined were always reported.

Applications for approval of business interests or additional occupations are submitted through line managers and recorded centrally by the human resources (HR) section within the PAU. Approval is granted only following checks by the ACU and after consideration of the applicant's performance, absence record and other factors. The HR department maintains a database of applications and new cases are routinely reported to the monthly PAU tasking and co-ordination meeting. The database includes cases which have been declined as well as those which have been approved.

Where appropriate, conditions are attached to approvals for secondary employment or business interests, and examples were provided to HMIC of recent cases where the force had rescinded secondary employment approvals following performance reviews (for example where employee's absence had increased).

HMIC found the process was actively and positively managed by the human resources (HR) unit which reflected the benefits of the integration of the HR department and the PSD within the PAU structure.

All approvals require annual renewal and the force broadcasts an email reminder to every member of staff each year underlining the need to report or renew secondary occupation approval. Line managers are informed of approved and rejected applications but where applications are rejected there is no routine follow-up process. Compliance checks are made only in response to a management report to the ACU or other information.

The force has measures in place to identify trends in relation to integrity issues. For example, force payroll services routinely check inconsistencies in expenses claims they receive and seek further information where claims are high or unusual.

The PAU daily management meeting is sometimes attended by a member of the OPCC staff to ensure the OPCC is aware of emerging trends in complaints. The PCC is provided with details of all chief officer expenses and the ETA panel has oversight of the gifts and hospitality register. There is, however, no preventive process in place to cross-reference records, diaries and other sources to identify potential integrity issues affecting chief or senior officers. Such a process would benefit the force, enhancing transparency and providing assurance to the public that active checks are being carried out.

Recommendation

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

Misconduct and unprofessional behaviour

The force information assurance department (which is part of corporate services) oversees information security. This department carries out a comprehensive programme of auditing and examines the data being recorded or accessed on the police national computer (PNC) and other force computer systems. Where necessary, the department also works in conjunction with the ACU. The force recently conducted Operation Shrove, which examined police data accessed by staff and identified around 100 cases of questionable activity. These cases were being investigated at the time of the inspection. The ACU also carries out a range of checks and examinations, including entries on the gifts and gratuities register.

HMIC found that Operation Shrove was an innovative and ultimately productive operation. The force should develop further preventive integrity testing using similar methods.

The PAU co-ordinating meeting is held every 28 days and chaired by an assistant chief constable. The meeting consists of an open session which examines current levels of,

or trends within, complaints, the numbers of civil claims against the police and 'service recovery events' where immediate efforts are made to put right a failure in service resulting in complaint.

The meeting also has a closed session where current cases are examined, progress is checked and actions are monitored. The minutes of the meeting evidence a clear process to set, allocate and track actions and outcomes and to provide updates on individual case reviews.

The force has processes in place to ensure that candidates for specialist roles, promotion and courses such as strategic command are vetted. The vetting process includes consideration of misconduct or unprofessional behaviour issues. Although there are occasional delays in the process, checks are sometimes carried out after initial selection but before candidates are offered posts.

Under the new PAU structure, the force has introduced processes to identify individuals who may be a cause for concern and to enable early management intervention or investigation where appropriate. The process includes thresholds that will trigger a case review, such as a number of public complaints or periods of absence. Where a review is triggered, a wider analysis of individual history and recent events is undertaken. This is scored within a matrix of risk factors to determine the necessary level of further monitoring, investigation or intervention.

In addition to triggering a misconduct investigation the process can result in other interventions such as unsatisfactory performance procedures or integrity interviews whereby aspects of an individual's behaviour may be challenged. Current cases which are being monitored or investigated are reported confidentially at the monthly PAU co-ordinating meeting, which also considers misconduct investigations and updates on gifts and gratuities reports. An example of the minutes from such a meeting from 2013 indicated that there were 37 current cases being monitored and 18 new nominations under consideration.

This process actively identifies potential integrity and misconduct issues and clearly contributes toward improved organisational performance. It is a promising area which is still being developed by the force although, once triggered, each case has to be researched and this limits efficiency. The force recognises that a solution to these technical issues has potential to provide more effective means to identify other groupings or behavioural trends that will further enable targeted interventions.

A senior investigating officer is routinely appointed in misconduct cases. To ensure fairness in the decision-making during investigation, recording and eventual disposal, cases are overseen by the assistant chief constable at a monthly meeting and scrutinised subsequently by the ethics and transparency audit panel.

Examples of 'bad apple' referrals and the force's subsequent response to them were examined during the inspection. HMIC found that the responses by the ACU staff were consistent and timely; referrals were noted usually on the same working day or within 24 hours and a reply sent acknowledging the referral. Thereafter, the investigator regularly reported case progress to the individual who had referred the case.

HMIC accessed the force website to examine the information it published. The force uses the site to provide a range of useful reference material and information to the public. However, accessibility was limited by aspects of the website's layout and the prominence of similar but out-of-date documents from previous years within search results.

The force publishes on the website itemised details relating to chief and senior officers including visa card expenditures and expenses and travel claims, as well as details from the gifts and hospitality register. Although details of business interests are not published, the information that is provided is comprehensive and several other similar documents are also available.

Other information from the gifts and hospitality register was available to staff via the intranet but the force does not routinely publish the outcome of misconduct hearings. This information would assist the workforce to identify professional boundaries and draw to attention to the force's focus on tackling misconduct.

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.

Where appropriate, the force appoints independent members to misconduct panels to provide transparency and ensure fairness and chief officers ensure that the panel chair is unconnected with the employee who is the subject of the hearing.

The force has consulted other forces to compare policy and practice and although fast track dismissal has been considered during proceedings it has not yet been used.

Professional standards training and resourcing

Staff and officers received training in the National Decision Model (NDM) soon after appointment and it features as an element in other training courses. There was clear evidence that the model was reinforced during protective training for police officers, who recognised its relevance to decisions on conflict resolution, the appropriate use of force and

dealing with vulnerable victims. However, there was no similar evidence that the model was used by officers as a framework for decisions on ethical issues and it was also much less familiar to their police staff colleagues.

Officers and staff from the ACU regularly contribute to courses for new recruits, police staff and supervisors. The ACU had also trained the information assurance department on their audits of force data systems. Aside from these contributions, however, the force does not provide structured in-service training on integrity issues.

The ACU takes some responsibility for training but it is not their central role and the force should consider who else could provide this training.

To promote learning, the Independent Police Complaints Commission (IPCC) bulletins are circulated quarterly. The force has co-located the learning and development department within the PAU, placing them alongside the PSD staff to enable closer contact between the two, so that they can develop learning from experience for the organisation from the outcomes from misconduct investigations.

An early intervention approach is now being used to identify staff who are not performing to the required standard and appropriate action is being taken. The PAU responds to issues raised in IPCC bulletins by using an action plan to identify areas that may be relevant to the force and assigning owners to actively mitigate the risk of a similar incident occurring in force.

The ACU is led by a detective chief inspector and comprises two detective sergeants, three investigators, one detective constable and an analyst. The unit can also access the two researchers working within the PAU.

The ACU members of staff either have been trained or are in the process of accreditation under the 'initial crime investigator development programme' (ICIDP). Some ACU members of staff have attended national College of Policing bronze or silver ACU courses and other counter-corruption training courses provided in the region. All staff in the unit have been trained in gathering intelligence from publicly available sources, known as 'open source' intelligence.

Members of staff in ACU undergo a rigorous selection process. HMIC found that there was no succession planning process for staff in place, although staff turnover is not frequent and a formal policy is not required at the moment.

ACU staff resources are considered by the force to be adequate to deal with the demand and the staff numbers have been preserved. The unit has recently investigated a range of cases as well as undertaking Operation Shrove, which involved the examination of force records to identify staff who had inappropriately accessed the force IT systems.

Where necessary, the unit is able to draw on additional support from within the force or regionally (for example, from the information assurance unit).

Quality assurance

HMIC found that the OPCC conducts audits of decisions in misconduct hearings to ensure fairness.

To ensure investigations are justifiable, conducted at the right level and escalated where necessary, cases under investigation are considered initially by the assistant chief constable who acts as the 'appropriate authority' and thereafter, at key stages such as the decision on whether or not to charge by the Crown Prosecution Service (CPS). The assistant chief constable continually oversees the progress of cases and their timely management. At the time of inspection in July 2014, fifteen cases had been referred to the Independent Police Complaints Commission (IPCC) in 2014 while during 2013 the force had referred 78 cases.

Following the merging of departments to create the PAU, all misconduct cases are handled by this central unit. No investigations are conducted locally either within departments or in the local patrol team areas.

HMIC conducted a review of 15 PSD investigations; this included reviewing randomly selected cases involving serious misconduct or criminal conduct. The aim was to check on timeliness, supervision and appropriateness of decision making. Of these, four were appropriate for referral to the IPCC and had been referred. In one of the cases, the referral had been delayed for over a month but there was no rationale or explanation for that delay available within the file. HMIC also noted that among five cases examined where officers had resigned or retired during proceedings there was no record of the decision rationale contained within the file.

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

Corruption investigation

The force has changed its organisational structure and created a performance assessment unit (PAU) which combines the PSD, ACU and HR departments. HMIC found the PAU model reflected the positive steps taken by the force to develop a more effective approach to monitoring and identifying early issues affecting individual officers or police staff that may require intervention. The force recognises a need to reinstate some resources removed in a previous review and new managers have been appointed within the PAU and ACU.

The force has successfully undertaken several significant investigations over recent months including investigations into improper and exploitative relationships and information systems abuse.

The PAU positively and effectively directs investigations on a day-to-day basis. The ACU team operates efficiently and has successfully identified and brought proceedings against corrupt officers.

The force uses the National Crime Agency (NCA) threat assessment process to consider the risks and identified three areas around which harm reduction strategies should be based: information management; abuse of powers or police authority; and organised crime groups. The joint force and OPCC strategic risk register contains reference to risks affecting performance and professional standards arising from the impact of economic hardship, but does not specifically identify risks associated with corruption.

The closed session of the monthly PAU co-ordination meeting provides an opportunity to identify harm reduction strategies and to develop preventive or proactive methods to investigate and identify corrupt practice. Although several effective operations have been undertaken, including Operation Shrove (mentioned above) and Operation Burns (which successfully identified abuses of authority by officers who have formed relationships with vulnerable women), the principle business of the meeting is the oversight and management of ongoing misconduct investigations. The force would benefit from a structured oversight process to ensure long term and proactive operations are co-ordinated to mitigate the identified risks.

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.

HMIC found the 'matrix' system used by the force to identify individuals vulnerable to corruption is a positive initiative that supports better engagement with staff by providing their supervisors with information which they can use to challenge and address poor behaviour.

The matrix process will be enhanced, as IT systems are developed which are capable of providing data automatically.

The ACU uses a range of data sources and actively seeks information about staff who may have used force systems inappropriately. The head of ACU also holds regular meetings with local patrol team (LPT) superintendents to share information or identify areas of concern.

The force has attempted to work in accordance with the ACPO national vetting policy, although delays have been caused by the part-time absence of the responsible case manager within PAU. Most vetting is carried out within PAU but clearance of contractors is undertaken by the estates and facilities department supported where necessary by the PAU.

The force complies with national standards for initial vetting but annual reviews and renewals are limited and little proactive vetting is undertaken. The PAU has already identified these omissions and is in the process of addressing the need for more resources to carry out further vetting enquiries.

The force has technical systems in place that monitor the use of force IT resources. Social network sites are examined periodically by the ACU and in response to issues raised by employees who report inappropriate material posted on social media sites by colleagues.

While details of expenses are recorded and published, there is no proactive process in place to cross-reference records, diaries and other sources to identify potential integrity issues affecting the chief constable or senior officers. Such a process would benefit the force, enhancing transparency and providing assurance to the public that active checks are conducted.

The force regularly conducts random drug testing and had recently undertaken 'with cause' testing in relation to steroid use. Such 'with cause' testing is based on the receipt of intelligence suggesting it is necessary.

In order to ensure serious organised crime investigations are not compromised by threats of corruption, operational security intelligence officers attend the force tasking meeting and subsequently meet confidentially with the head of ACU to identify threats or risks and to establish necessary countermeasures.

In terms of data security, the ACU are provided with discreet IT systems and have a dedicated staff member providing IT support. The PSD functions are combined with HR and learning and development, operating from the combined large office space accommodating the PAU. The ACU is separately located in a secure area within a separate building on the force HQ site. Both the ACU and PAU restrict access to pass holders. The offices are fitted with alarms and secure file storage is available. The ACU also has access to audit software which controls building entrance security systems.

Intelligence

HMIC found the work done by the force to identify patterns of behaviour by some officers who were abusing their position to form sexual relationships with vulnerable victims had been successful and effective. The force has developed expertise, methods for analysis and profiling criteria that will undoubtedly be useful to other forces seeking to identify and prevent similar types of systematic misconduct.

There are two analysts within the PAU and one within the ACU who carry out trend and pattern analysis. There was clear evidence of effective analysis particularly in relation to identifying predatory officers, and the identification of individuals vulnerable to corruption. HMIC found less evidence, however, that analysts' work is consistently linked to the risk assessment or that the outcomes of analysis have been converted to plans which will routinely inform future work by ACU. This needs to be addressed through a comprehensive governance process which develops proactive and preventive anti-corruption investigations.

Capability

The ACU is a small unit consisting of four police officers and four police staff in total. Current demands were reported as being manageable. HMIC found that the PSD and the ACU staff were confident that, where the need arose, they would have available to them specialist or additional assets either from within the force or from other forces in the region.

The head of the ACU (a detective chief inspector) reports to the head of the PAU (a superintendent) but can access the assistant chief constable where necessary for urgent issues. The ACC is briefed on all ACU investigations.

The force has co-located the learning and development department within the PAU and alongside the PSD staff to enable closer contact and develop lessons to be learned for the organisation arising from public complaints as well as the outcomes from misconduct investigations. This process is also supported by the early intervention approach used where individual officers or staff are identified as susceptible to corruption and necessary action follows.

Recommendations

- **Within six months, force should ensure that it has a policy which 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.**
- **Within six months, the force should ensure all staff understand the support mechanisms available to those individuals reporting misconduct.**
- **Within six months, the force should ensure that it has the proactive capability to effectively gather, respond and act on information which identifies patterns of unprofessional behaviour and corruption.**
- **Within six months, the force should ensure it carries out regular audits of integrity-related registers including gifts and hospitality, business interests, notifiable associations, expense claims, procurement activity and other records to identify potentially corrupt activity.**
- **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 effective processes to minimise the risk of compromise to investigations into serious and organised crime.**