



Inspecting policing  
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# Police Integrity and Corruption

Suffolk Constabulary

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

There is clear leadership from the chief constable to create a climate of ethical behaviour, and staff and officers are familiar with 'what you need to know', a booklet issued by the chief constable, together with his counterpart in Norfolk Constabulary, that sets out what is expected in terms of standards and integrity. Staff are prepared to challenge inappropriate behaviour and feel the organisation will support them when doing so. However, the rigour of initial assessments of misconduct cases where there is a potential of criminal offences is unsatisfactory and there is limited proactive work to identify trends, risks or vulnerabilities in respect of corruption.

### Summary

There is clear leadership from the chief constable to create a climate of ethical behaviour, and staff and officers are familiar with 'what you need to know', a booklet issued by the chief constable, together with his counterpart in Norfolk Constabulary, that sets out what is expected in terms of standards and integrity. Supervisors and line managers are positive role models, encouraging professional behaviour. Staff are prepared to challenge inappropriate behaviour and feel the organisation will support them when doing so.

An integrity working group has been established which is chaired jointly by the deputy chief constables of Norfolk and Suffolk and the force has good plans in place to manage the introduction of the Code of Ethics. Joint policies have been developed with Norfolk Constabulary around business interests and gifts and hospitality, and staff have a knowledge of these policies.

Police staff feel that they were not treated fairly and equally in terms of how investigations into conduct and public complaints were assessed, recorded, investigated and sanctions imposed. The rigour of initial assessments of misconduct cases where there is a potential of criminal offences is unsatisfactory, and where criminal interviews are conducted with staff, there is little evidence of supervisory oversight or guidance prior to any misconduct determinations being made.

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There is limited analytical, research and intelligence development capacity within the anti-corruption unit (ACU) and what does exist is being used to react to and support ongoing investigations. Limited proactive work is therefore undertaken to identify trends, risks or vulnerabilities in respect of corruption. The force does not use random or with cause (intelligence-led) drug testing, or intelligence-led integrity testing to identify corruption.

Suffolk and Norfolk Constabularies have a joint vetting unit that complies with the national vetting policy and identifies corruption risks at the recruitment stage for officers and staff.

**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.

**1: The monitoring and review of the procurement register against the gifts and hospitality register.**

The force now audits the registers regularly and inappropriate entries are challenged or investigated, up to and including chief officers.

**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 leadership from the chief officer team, who deliver important messages using a variety of means.

Staff are able to challenge poor behaviour and feel they will be supported if they do so.

Police staff feel they are not treated fairly and equally in terms of how investigations into conduct and public complaints are assessed, recorded, investigated and sanctions imposed.

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

The force's capacity to identify and investigate misconduct could be enhanced.

The force responds to reports of wrongdoing by staff effectively and does so in as timely a manner as other similar forces.

Staff in the professional standards department (PSD) and the ACU receive training for their role. Two days a year are allocated for team training.

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

The force maintains effective security of systems, exhibits and case papers.

There is limited analytical, research and intelligence development capacity within the ACU.

Limited proactive work is undertaken to identify trends, risks or vulnerabilities to the force.

The PSD and ACU have access to the force's specialist teams, such as the surveillance teams and they have access to additional specialist resources from the region.

**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?**

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

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

The force has good plans in place to ensure the Code of Ethics is fully understood and applied.

There is a joint vetting unit that complies with the national vetting policy.

The rigour of initial assessment of misconduct cases where there is a potential of criminal offences is unsatisfactory.

## The force/constabulary in numbers



### Complaints

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

**353**

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

**16.4**

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

**15.7**



### Conduct

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

**32**

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

**1.5**

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

**2.6**





## Business interests

Applications in 12 months  
to March 2014

**163**

Approvals in 12 months  
to March 2014

**159**



## Resources

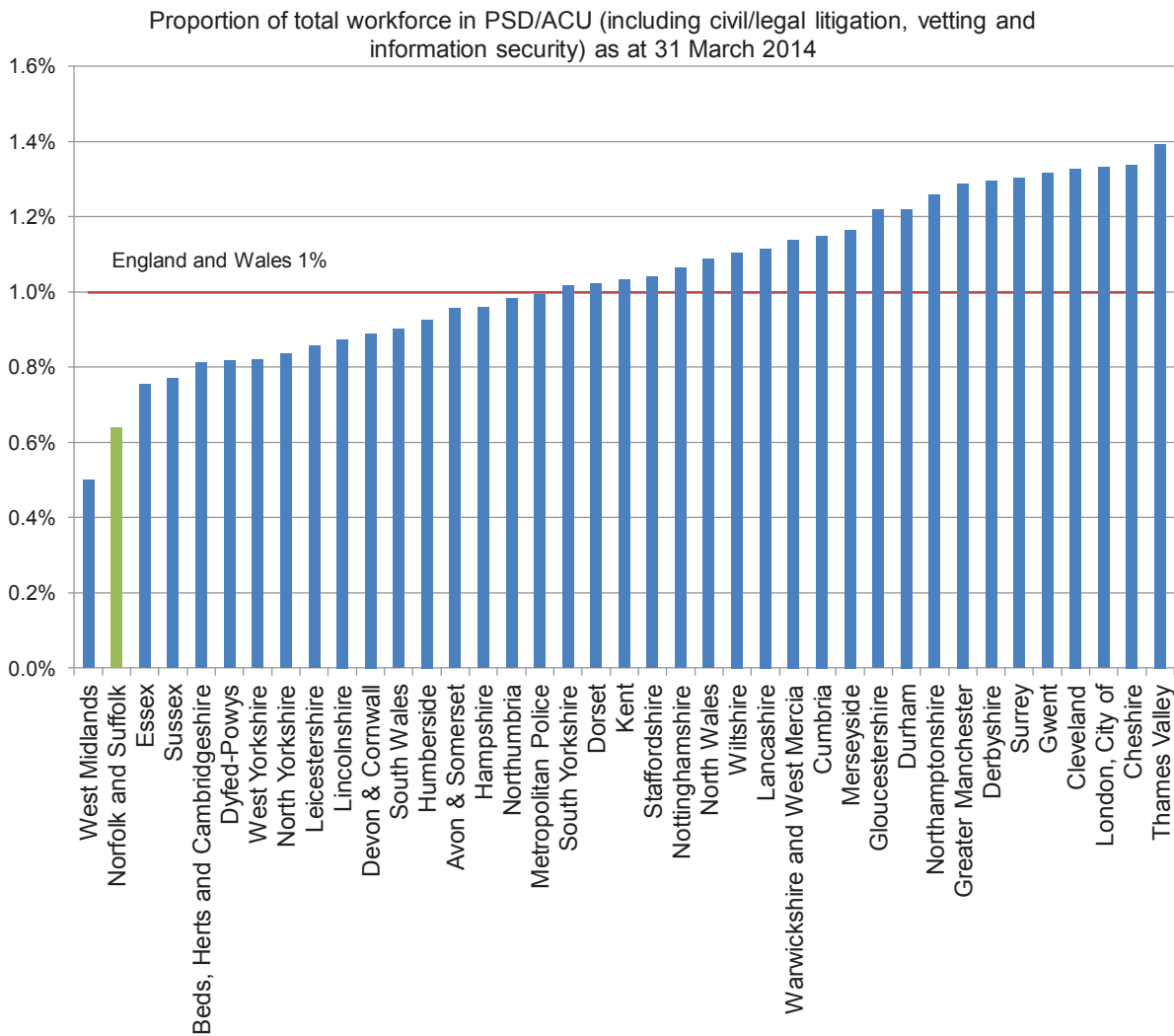
Proportion of workforce in  
PSD/ACU

**0.6%**

Proportion of workforce in  
PSD/ACU  
– England and Wales

**1.0%**

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



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

# Introduction

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

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

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

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

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

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

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

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

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

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

HMIC highlighted one area for improvement for Suffolk Constabulary from the 2012 inspection report:

- The force was required to introduce a process for cross-checking contract and procurement registers with gifts and hospitality register in order to ensure the integrity of the procurement process.

With respect to this issue, the force developed a process whereby the anti-corruption unit monitor and review the procurement and the gifts and hospitality register to ensure the integrity of the procurement process.

The force has made good progress with this area for 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 chief constable has demonstrated clear leadership in his determination to ensure that police officers and staff act ethically and professionally at all times. He has led a comprehensive programme of roadshows promoting strong messages about the importance of ethical policing. A large number of police officers and police staff have met the chief constable personally, either as part of the roadshow programme or through his regular station visits. This accessibility and visibility is highly appreciated. The chief constable also records video blogs; takes part in web chats and issued the 'what you need to know' guide to all staff. This sets out advice and guidance on integrity and professional conduct. The chief constable has also made it clear that integrity and standards affect public perception and are vitally important in supporting the force's 'making Suffolk safer' campaign.

The messages given by the chief constable are reinforced by the deputy chief constable (DCC) who chairs the joint Norfolk and Suffolk integrity working group.

Officers and staff in Suffolk Constabulary are fully aware of the boundaries of unprofessional and professional behaviour and understand well how poor standards affect both the public and their colleagues. We spoke to many staff who had just received their 'What you need to know' guide; they found it useful. The distribution of clear guidance given personally to staff, in the form of a booklet that they can keep, represents good practice.

Staff are comfortable discussing ethical issues and supporting each other in learning more. A video featuring a well-known and respected commander discussing integrity and professionalism issues has been shown to all officers during daily briefings. Supervisors have used this as an opportunity to encourage a proper discussion and debate on the issues covered. Police supervisors (but not police staff) have also received training on integrity from the deputy chief constable (DCC) and the professional standards department (PSD) during briefings at constabulary headquarters.

Norfolk and Suffolk Constabularies collaborate across a range of support services. As services are joined up and policies and guidance are updated, the opportunity is taken to update references to ethical and professional behaviour. Policies in respect of business interests, information security and social media use have all been updated recently.

Most managers and first-line supervisors in Suffolk Constabulary lead by example and demonstrate their personal commitment to ethical behaviour. Sergeants, in particular, have a key supervisory role on the ground. Staff told HMIC that conversations relating to policing with integrity are a commonplace part of the everyday workplace routine. This is good practice. Supervisors understand that it is their role to ensure their staff understand what is expected of them in their professional and private life. Supervisors have received guidance aimed at supporting them in this role.

Unethical and unprofessional behaviour is appropriately challenged across the force and staff feel confident in doing so, thanks to a supportive culture and environment. Staff report to supervisors and do so anonymously, and they are confident that when they report wrongdoing they themselves will be supported.

The force has clear plans to ensure the new Code of Ethics is understood and applied. The two chief constables and their respective police and crime commissioners (PCC) have signed up to the Code of Ethics. An integrity working group has been established which is chaired jointly by the DCCs of Norfolk and Suffolk. The group is overseeing the implementation of a comprehensive action plan.

There is a notifiable associations policy outlining the obligation on officers and staff to declare personal associations and relationships, and any changes in circumstances. Notifications are reviewed and acted on appropriately. New staff and supervisors are briefed on notifiable associations and two-thirds of staff have been trained on the matter through a computer-based learning package.

The National Decision Model (NDM) is in use across the force. Police officers, but not all police staff, are trained and understand its application. All staff receive training on ethical and professional behaviour but not always on a regular basis. Staff are expected to undertake the computer-based learning package Integrity Matters and the completion rate is monitored by the force. New recruits, supervisors and some detectives have been trained by the PSD. The force does not have a way of testing how effective its training has been, although the new head of training has plans for this. However, there is little evidence that the NDM is being used to support effective decision-making within the PSD.

Chief officers provide sufficient information to the PCC to enable him to understand any integrity issues (including misconduct and unprofessional behaviour).

Chief officers monitor integrity issues (including misconduct and unprofessional behaviour) routinely although the detail is not sufficient to enable them to understand the issues fully and identify the need for action. We conducted a review of a small number of PSD cases. This included reviewing 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 Suffolk, HMIC judged that the decisions in six of the investigations were not sufficiently supported by evidence that was readily available in the case file. However, some further evidence to support the decision-making process was subsequently provided. A number of these files were drawn to the attention of the chief officer team.

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## Understanding integrity

Details of occasions where officers and staff were offered gifts or hospitality are recorded in a centrally held register. Entries are also made where the gift or hospitality is not accepted. The register is audited regularly and inappropriate entries are challenged or investigated, up to and including those relating to chief officers. All acceptances of hospitality must be signed off by the head of the PSD and submitted to the DCC for approval every quarter. There is a good understanding across the force about the issue of hospitality and its implications.

Information regarding applications for authorisation of a business interest is recorded fully in a register held by the ACU. Entries are also made where the application was not authorised. The record is audited regularly. Authorised applications are reviewed at regular intervals for renewal. All applications are signed off by the head of department of the applicant and then forwarded to the ACU where they are risk assessed. The force publishes information on business interests of its staff on its website and this is updated annually.

The force publishes data and information in relation to gifts and hospitality registers for chief officers, gifts to officers and staff (including accepted and rejected offers), expenses of chief officers, senior officers, and police staff equivalent and the register of business interests. This information is found under the freedom of information section of the force website. Some of the information could be better presented, for example the details relating to chief officer expenses are not clearly titled. Some of the documents could not be accessed and others appeared to be incomplete.

# 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 records are generally considered when staff apply for promotion or for transfer to specialist roles, but on occasions this does not happen.

From the HMIC dip-sample of files, it appears that the force does not routinely review how investigations are assessed, recorded and investigated, or how sanctions are imposed to ensure that all staff, irrespective of rank or role, are treated fairly and equally.

The force has confidential mechanisms in place to enable staff to report wrongdoing. There is a confidential phone line, an encrypted email system and the force is considering introducing an additional confidential reporting mechanism called Bad Apple that other forces use successfully. Not all staff are entirely convinced that these reporting mechanisms are truly anonymous. Suffolk and Norfolk are currently working together to introduce an improved wrongdoing policy, which should bolster staff confidence in the confidential reporting mechanisms.

The force responds to reports of wrongdoing by staff effectively and does so in as timely a manner as other similar forces. The Police (Conduct) Regulations 2012 are consistently applied with cover from the PSD officer on-call who is able to provide out-of-hours expertise. Evidence from the Independent Police Complaints Commission (IPCC) on the timeliness of complaints handling show that to the 12 months ending in March 2014 it took an average of 99 days to resolve cases, compared to the most similar force average of 98 days. This is an improvement on the 122 days recorded for Suffolk in the previous year.

Cases are appropriately referred to the IPCC. All cases are reviewed and the experienced staff within the PSD raise issues where they consider that a referral is required. The force works closely with the IPCC through the joint PSD unit.

## Professional standards training and resourcing

Staff in the PSD and the ACU receive training for their role. Two days a year are allocated for team training. ACU staff follow the College of Policing corruption development programme. The detective inspector within the ACU recently attended the detective inspector development programme, which assists the department in its management and direction of investigations.



Succession planning takes place to ensure consistency in the PSD and the ACU. This is a standing item on the senior management team meeting within the PSD, and where necessary, targeted recruitment takes place to identify and attract staff with the right skills and qualifications.

The force acknowledges that the PSD is not sufficiently resourced to enable it to take a proactive and preventive approach. The force has done some proactive work in respect of sex offences, but this would benefit from being extended. The PSD has good analytical and research support, which could be deployed to more proactive work.

## Recommendation

**Within six months, the force should ensure the capacity and capability of the PSD and ACU are reviewed so as to meet the level of demand from misconduct and corruption investigations.**

Staff and the associations that represent them feel that misconduct hearings in Suffolk are conducted in such a way as to ensure transparency, effectiveness, efficiency and legitimacy. However, police staff feel that they were not treated as fairly and equally as police officers in terms of how investigations into conduct and public complaints were assessed, recorded, investigated and sanctions imposed. The presiding officer is appropriately qualified and independent of the person investigated. The force makes use of fast-track dismissal where appropriate.

## Quality assurance

The force does not audit decisions made at misconduct or unprofessional behaviour hearings. HMIC's dip-sample of files highlighted elements of poor record-keeping and insufficient information on the rationale for decisions. These files were drawn to the attention of the chief officer team during the inspection.

Of particular concern was the inadequacy of the original assessment of misconduct cases for potential criminal offences. In addition, where criminal interviews were conducted there was little evidence of the criminal matters being reported to the Crown Prosecution Service or of any recorded supervision prior to any misconduct determinations being made. In one case there was evidence that important facts (available at the time) were not brought to the attention of the DCC, as authorising officer, to make a final determination. This case was brought to the attention of the force for immediate action, who undertook an immediate review of the case.

There appears to be a number of decisions taken to resolve an allegation by using management intervention rather than a proper investigation that could have led to gross misconduct proceedings. HMIC found little evidence of effective record-keeping of the planning of investigations or rationale for the decision-making process. Evidence of an initial severity assessment was rare. No evidence of audit processes currently exists at a strategic level to provide assurance to chief officers of the integrity of systems and processes and to ensure consistency.

## Recommendation

**With immediate effect, the force should ensure it has an effective process to monitor and audit the decision-making process and record-keeping for investigations.**

The force does not ensure the timeliness and quality of all investigations conducted, in relation to officers and staff, whether they are carried out by the PSD or another department or locally on policing areas. Timescales are sometimes missed and some investigations are delegated to sergeants, which is inappropriate.

The force publishes The Professional Standard, a quarterly bulletin produced and circulated by the PSD, which details various integrity-related issues including lessons learned. However, it is left to officers to read and absorb these lessons and there is currently no mechanism to check that this has been done. The force has a complaints reduction strategy using learning derived from the IPCC bulletins.

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

## Corruption investigation

Neither the PSD nor the ACU hold a daily tasking meeting to assess new intelligence or ongoing enquiries, however the ACU holds a two-weekly meeting where new intelligence and ongoing enquiries are assessed.

Suffolk and Norfolk Constabularies have a joint vetting unit that complies with the national vetting policy and identifies corruption risks at the recruitment stage for officers and staff. Vetting is revisited on promotion to senior ranks or posting to sensitive and vulnerable roles.

The force has the capability to monitor force systems and takes proportionate action when appropriate. However, HMIC found little evidence of proactive system monitoring. Only when intelligence reports are received is a decision made on whether they need to be followed up. The force does carry out monitoring of its social network sites during office hours but does not monitor other sites. The anti-corruption unit has always carried out any work requested, but sometimes has to prioritise the order of work.

The force does not use random or with cause (intelligence-led) drug testing, or intelligence-led integrity testing to identify corruption. HMIC found that no drugs tests, either random or with cause, have been carried out in the last two years and there is no infrastructure to support testing. Chief officers acknowledged that drug testing had been discontinued due to the lack of positive tests and the view that it was an inefficient use of resources.

## Recommendation

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

The force maintains effective security of systems, exhibits and case papers. There is a standalone computer within the ACU with restricted access to those working within the unit. Good building security with effective audit, property and exhibit management is in place within the PSD.

The force has taken steps to ensure that organised crime investigations are not compromised by corruption risks and ensures that forthcoming operations are mitigated from the risk of corruption.

## Intelligence

There is limited analytical, research and intelligence development capacity within the ACU and what does exist is being used to react to and support ongoing investigations. Limited proactive work is therefore undertaken to identify trends, risks or vulnerabilities to the force. Intelligence that is received is assessed by the ACU, and further developed as appropriate and action taken to mitigate the identified risks.

## 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.**

## Capability

The PSD and ACU have access to the force's specialist team assets, such as the surveillance teams and they have access to additional specialist resources from the region.

Within the PSD and ACU there is limited capacity. The force acknowledges that it mainly reacts to information regarding corruption and takes very few steps to undertake proactive and preventive work. The majority of preventive work is aimed at educating staff rather than uncovering wrongdoing. HMIC is concerned by this acknowledged lack of proactivity in identifying corruption.

# Recommendations

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- **Within six months, the force should ensure the capacity and capability of the PSD and ACU are reviewed so as to meet the level of demand from misconduct and corruption investigations.**
- **With immediate effect, the force should ensure it has an effective process to monitor and audit the decision-making process and record-keeping for investigations.**
- **Within six months, the force should ensure it has a policy on substance misuse and drug testing to identify and deter substance misuse. The force should communicate this to all staff.**
- **Within six months, the force should ensure that it has the proactive capability to effectively gather, respond and act on information which identifies patterns of unprofessional behaviour and corruption.**