



Inspecting policing
in the public interest

Police Integrity and Corruption

Surrey Police

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

Surrey Police has an established professional standards department including an anti-corruption unit. The force has made good progress since the last HMIC inspection embedding positive behaviour, good standards and a clear plan for implementing the Code of Ethics. The anti-corruption unit capability is effective but its capacity is limited. There is a need to improve how the force reduces the risk of corruption and increases capacity to prevent and investigate.

Summary

There is clear leadership from the chief constable and chief officer team concerning the importance of values, ethics and personal behaviour. Policies and procedures take into account standards of behaviour and integrity. Staff are aware of their responsibility to challenge and report misconduct and unprofessional behaviour with a well understood confidential process for individuals to report wrongdoing. The force has a clear plan to embed the Code of Ethics and staff are aware of this.

Training on ethical and professional behaviour, including the Code of Ethics, is provided to all staff.

The professional standards department (PSD) complete the vast majority of both public complaint and conduct investigations, regardless of the severity. There are a large number of open or pending public complaint investigations that the force has recognised as an issue and they have recently placed additional investigators into the PSD to clear the backlog. This, though, is a short-term solution and the force as a matter of urgency needs to take action to avoid a repeat of this. The inspection highlighted a concern that there is a belief among staff that there is disproportionality in misconduct cases between police staff and police officers through to findings and sanctions.

Surrey Police has an established anti-corruption unit (ACU) with staff that have good knowledge, skills and understanding of the organisation and systems. The ACU provides an intelligence development role and is supported by an analytical and research function. The force has recognised a gap in technology to efficiently monitor the use of force systems and social networking sites, and are intending to purchase affordable IT solutions to assist in monitoring.

The force does not ensure that organised crime investigations are not compromised by corruption from criminals or corrupt employees. The force has not taken steps to ensure that organised crime investigations have not been compromised by corruption risks. They have taken very recent steps (August 2014) to ensure that forthcoming operations are mitigated from the risk of corruption.

The PSD has appropriate tasking and co-ordination processes in place, and there are also clear governance meetings that cover all of the PSD performance that are held on a regular basis with records being kept. The force commissioned a peer review by Thames Valley Police; this identified and recommended the need to increase the capacity of the ACU to complete proactive prevention, intelligence gathering, analysis, development and investigation of corruption.

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 need to improve the cross-referencing of procurement with the gifts and hospitality register.

Effective monitoring is in place to cross-reference the IT system to track purchase orders and procurement to the point of payment. The force is developing a joint procurement process with Sussex.

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 with main messages delivered using a variety of means. Staff and supervisors will challenge poor behaviour and the force has a good confidential reporting mechanism.

Ethical and professional behaviour has been incorporated into some but not all relevant policies.

The force has clear plans to effectively communicate and embed the Code of Ethics.

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

The PSD manage the gifts and hospitality and procurement registers on standalone computer systems rather than on the existing PSD computer systems.

The force publishes information on chief officer expenses, gifts and hospitality and the results of misconduct hearings on its website.

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

The ACU has officers and staff with good knowledge and capability.

There is access to specialist resources.

There is a need to improve the capacity of the ACU to enable proactive research, analysis and investigation.

ACU staff lead on checking systems misuse but only in support of ongoing investigations or reactively.

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?

The force uses scenario-based training which has been provided to all inspectors or police staff managers. This training is being cascaded to staff.

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

The force operates one system for officers and staff when assessing, recording and investigating reports of misconduct. Staff believe that there is disproportionality between how police staff are dealt with compared to officers.

The force has a large backlog of open public complaint investigations.

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

There are tasking and co-ordination processes in place by which new intelligence and other critical issues are assessed and prioritised for action.

There is appropriate referral of cases to the Independent Police Complaints Commission (IPCC).

The force/constabulary in numbers



Complaints

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

675

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

17.8

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

80

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

2.1

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

2.6



Business interests

Applications in 12 months
to March 2014

173

Approvals in 12 months
to March 2014

166



Resources

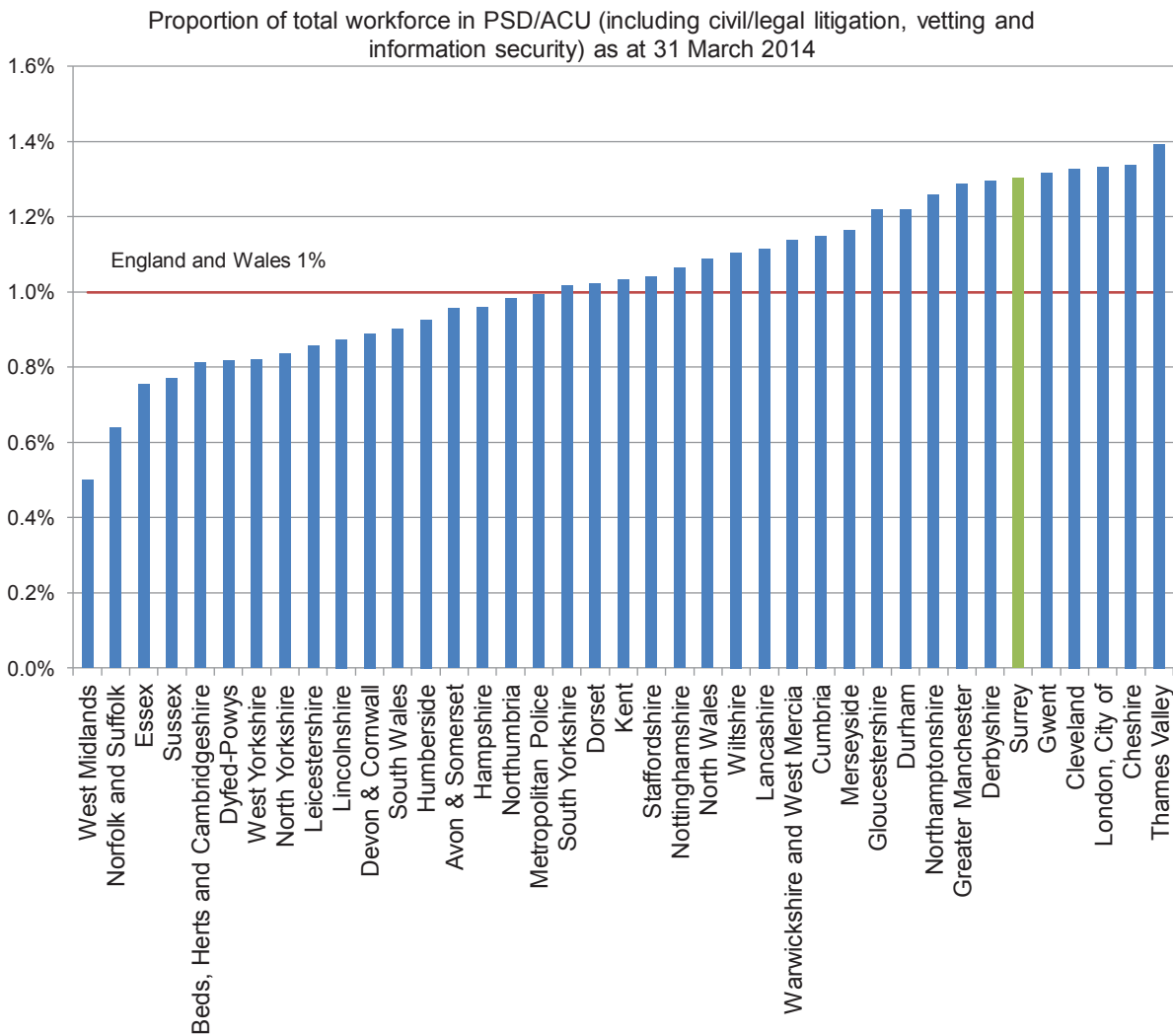
Proportion of workforce in
PSD/ACU

1.3%

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 from the 2012 inspection report:

- The force should implement procurement processes and a register that can be cross-checked with registers such as gifts and hospitalities, secondary and business interests, and chief officer expenses.

The joint procurement unit with Sussex Police has a good understanding of the legal requirements for purchase and contracts. There are currently different systems (SAP and Oracle) within each force to manage procurement, contracts and to track purchase orders to the point of payment; these systems can only be accessed by the joint procurement team. The head of procurement is introducing a new joint Surrey and Sussex procurement policy that is due for final approval later in 2014, which should improve the transparency, efficiency and effectiveness of procurement for Surrey. Standalone registers such as gifts and hospitalities, business and secondary employment have been improved and are searchable from one location, and there is ease of cross-reference. Registers have been audited and cross-checked since the beginning of 2014 and the head of PSD has met with the head of procurement to improve understanding and develop improved processes to ensure the integrity of the procurement and contract awards.

The force has a clear plan and governance structure, through the people strategy group and workforce planning and performance board, to deliver a culture of positive ethical and professional behaviour. Staff at all levels and all roles understand what good and professional behaviour is, what the public and force expect of them and importantly their personal responsibilities. The force records who has received training.

Overall the force has made good progress in the area of improvement identified in the 2012 report.

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

Surrey Police has made good progress in embedding professional behaviour across the force. There is clear leadership from the chief constable, with officers and staff having a high level of trust in the chief constable. The use of the chief constable blogs, leadership events, visibility, which is supported by all the chief officers, and quarterly meetings between the deputy chief constable (DCC) and staff associations creates a climate of ethical behaviour and challenge.

Staff responded exceptionally well to the DCC request on the chief constable's blog asking staff to participate in the recent HMIC crime data integrity survey. Staff felt that the approach from the chief officer team regarding this survey shows an improved management style, one that has moved away from being heavily focused on performance numbers.

Officers and staff are aware of the boundaries between unprofessional and professional behaviour and some understand how it affects both the public and their colleagues.

Ethical and professional behaviour standards have been incorporated into some but not all relevant policies and procedures. Staff are aware of relevant policies, and where they are unsure they know where on the force intranet to find out more or they are comfortable asking supervisors and managers.

There is a force level monthly meeting called the strategic crime incident and risk recording group specifically focusing on crime recording matters. The DCC has used these audits very effectively to make sure that serious crimes are properly recorded and such reports are always categorised to correctly reflect offending in the force area. The force has established an ethics board where the use of audits will, in the future, direct meaningful activity for the force.

There is evidence that managers, including first-line supervisors, lead by example and demonstrate their personal commitment to ethical behaviour.

The force has provided senior leaders and inspectors/managers briefing events on ethical behaviour. These have provided all sergeants or supervisors and above with clear guidance and practical training with examples which are being cascaded down to teams and individuals. There is a consistent understanding at all levels of what is expected of leaders.

Surrey Police has clear plans to effectively communicate and implement the Code of Ethics. This is being done in partnership with Sussex Police DCC together with both force heads of the PSD. Surrey has a communications plan in place and has introduced a concise explanation of the Code of Ethics with a section on frequently asked questions that is accessible on the force website. There have also been articles in the July/August Offbeat force magazine, and the chief constable blogs from November 2013 through to July 2014.

Staff stated that they feel confident to challenge unprofessional behaviour and this includes examples of misconduct reports concerning managers and supervisors.

There is a clear policy, the 'associations that may affect operational security procedure', that outlines the obligation to declare any change in circumstances in an officer's/staff member's personal associations and relationships, and officers and staff members are aware of their obligations in this regard. Notifications are reviewed and acted on appropriately. The policy, as well as covering notifiable associations, covers the subletting of properties and places that are suitable for residency. It does not provide clear advice on what steps to take other than when a report should be provided to the vetting unit. Staff have a reasonable understanding of the policy, but also a certain degree a fear of accidentally not realising an association is notifiable, and in turn not reporting it.

The National Decision Model (NDM) is used widely across the force. Officers and staff are being trained using a computer-based learning package which is mandatory for all staff. HMIC found that 46 percent of staff have completed this training; by the end of year the force is aiming to raise this to 75 percent. Staff understand, and know how to use the model, describing it as 'something we do, without even thinking about it anymore'.

Training on ethical and professional behaviour is delivered to all staff but knowledge is not checked. The force has introduced a good training package that includes the use of scenarios. The process of cascading this to all staff by managers is in its early stages, but staff either have an allocated team meeting for the training or know they are going to receive the training from their manager. Staff who have received the training are generally very positive about the training and the use of scenarios to work through integrity issues.

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

Integrity issues (including misconduct and unprofessional behaviour) are actively monitored by chief officers at governance meetings in a way that allows them to fully understand the issues, and identify any need for action. The DCC is the chief officer lead for the PSD. The DCC oversees an established governance structure that includes the professionalism and integrity board, and a quarterly meeting with external, independent members, known as the professional reference group. They bring specific knowledge and experience and are able to scrutinise and advise the force on integrity issues.

The head of the PSD has a regular meeting with the DCC to discuss performance and operational work within the PSD. The DCC and the head of the PSD also meet on a regular basis with the IPCC.

The DCC has set up a process known as the cultural dashboard that has four themes of: trust; transparency and change; professionalism and integrity; health, wellbeing and resilience of the force. Each strand had a senior manager lead who is developing an action plan. It is too early to judge how effective the activity will be in improving behaviour and ensuring integrity across the force.

Understanding integrity

Surrey Police undertake a regular staff survey that specifically asks integrity-related questions. The latest 2014 staff survey had a specific question asking if 'unacceptable behaviour is dealt with effectively'. Over 2155 staff responded with over 60 percent strongly agreeing or agreeing; just over 16 percent disagreed. These results are analysed through the DCC-chaired peoples' strategy board and actions allocated.

Details of all occasions where officers and staff are offered gifts or hospitality are recorded fully in a centrally held database (including where the gift/hospitality was refused) This is audited regularly with inappropriate entries challenged or investigated. The PSD own the policy and manage any notifications on a standalone system. There is a separate system for chief officers managed by one of the chief officers' staff officer. Staff have a good knowledge of the policy. Some staff said that they would take a risk adverse approach and decline any offers.

Details of all occasions where officers and staff have applied for authorisation for a business interest are recorded fully in a centrally held register, including where the application is refused. This is regularly audited and authorised applications are reviewed at regular intervals for renewal. The PSD complete all background checks and the head of the PSD decides on the majority of applications unless it was unusual, and then the DCC would consider the case. The DCC is the appeals authority for declined applications. The force has recently completed a review of the previous five years' applications to ensure consistency and appropriateness of the authorisations.

The force completes follow-up interviews with any individual who has had an application refused, and the ACU conducts an investigation where there is additional information to suggest a failure to comply with the decision.

Limited analysis is carried out to identify trends in relation to integrity issues (including misconduct and unprofessional behaviour). The PSD has one analyst and one researcher who do not have the capacity to proactively identify areas of risk.

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 when decisions are made about transferring officers and staff to specialist roles and for promotion. This includes applications for the strategic command course, and the fast-track development scheme. The PSD complete checks prior to any postings or promotions. HMIC was provided with an example of five individuals who had successfully passed a promotion process but who were then not promoted due to the findings from the checks completed by the PSD.

There is a perception by staff that there is disproportionality by the force in relation to reporting of conduct, recording, assessment, hearings and sanction. While some of these views concerned specific cases, it may be the recent increase in computer misuse investigations, mainly involving police staff, which may have contributed to this view. There is, however, a need for the force to either confirm this view or negate it and advise staff accordingly.

The force responded to reports of wrongdoing by staff in an effective manner but not in a timely manner. The PSD has a public complaints team investigating all cases not locally resolved, and a conducts investigation team who complete all gross misconduct and misconduct investigations. At the time of the inspection there were over 150 open investigations held by the PSD and a further 60 cases awaiting allocation for investigation. The levels of open investigations, and the fact that the PSD investigate all complaints that are not locally resolved is preventing the PSD from dealing efficiently and effectively with more serious complaints or misconduct. An independent peer review by Thames Valley Police also identified this issue. The force has realised the need to address the immediate issues and the DCC has allocated additional investigative resources to the PSD to help remove the backlog of open investigations.

Recommendation

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

HMIC found a difference in standard between public complaint investigations and misconduct investigations. The misconduct investigations have a clear rationale for decisions, good evidence of investigation plans and intrusive supervision. This approach is not as evident within the public complaints investigations. Most complaints are initially received in the contact centre. They try to identify a relevant supervisor (usually an inspector) who attempts to resolve the complaint within the first 48 hours. If this is not possible, then it goes to the PSD, which assess suitability for local resolution.

Not enough effort is put into appropriate local resolution of complaints and early management action to prevent or curtail poor behaviour, and too many complaints are being sent to the PSD for investigation.

The force publishes data and information in relation to: the gifts and hospitality register, covering all officers and staff, including accepted and rejected offers; the expenses of chief officers; and the register of business interests and the outcomes of misconduct hearings, including criminal convictions. The force also publishes the names of these individuals unless there is a valid reason not to at which point the agreement of the DCC is required.

Officers and staff have received training on integrity issues (including misconduct and unprofessional behaviour) and know their obligations to challenge bad practice. There are good examples of recent awareness training and advice being circulated through the Offbeat magazine, including articles on the Code of Ethics and notifiable associations.

Cases are appropriately referred to the IPCC and the chief constable has regular quarterly meetings with the IPCC commissioner to discuss misconduct and related issues. The PCC attends these meetings.

The force actively uses the IPCC bulletin to disseminate learning but does not encourage or collate responses. There is an awareness of the lessons learned bulletin, but staff are not always sure of what they have to do in response to these.

Professional standards resources and training

All staff working in the PSD and ACU have received training for their role. The PSD is predominantly staffed by accredited police staff investigators who are retired police officers with a pre-existing level of expertise, competence and qualifications.

Succession planning (to make sure that the right individuals are in place if someone leaves) does not take place to ensure consistency in the PSD and ACU. The force has recently agreed a process with Sussex Police for certain roles whereby the best officers available will be moved into important roles, including the PSD and ACU. There is currently a PSD tenure policy of two years for police officers. The negative side to this is that the PSD has staff that are moving on just as they get to a good level of expertise. This, coupled with high levels of sickness within the complaints team, is adding to the delay in processing the outstanding open investigations.

The PSD has a proportionately high number of staff compared to national figures. However, it doesn't do proactive work because it is tied up dealing with minor public complaints that should be dealt with elsewhere.

The force is working with Sussex Police to see if a combined PSD and ACU would provide a more efficient and effective department for both forces.

Recommendation

Within 6 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.

Quality assurance

Some auditing takes place to ensure that investigations are justifiable, dealt with at the right level, and escalated or de-escalated appropriately but this is not done regularly. Every investigation is reviewed for lessons learned with feedback received from panel members and counsel.

The force does not ensure the timeliness and quality of all investigations conducted, in relation to officers and staff. The force holds a conduct board to agree the severity of all new allegations with the PSD, human resources and local managers attending. This adds to delays in the process, where in most forces either the local/departments chief inspector or the PSD make the decision on severity at the same time as meeting the legal requirements of recording the matter.

The DCC, as the appropriate authority, has a consistent approach to suspension and looks to other alternatives such as restricted duties wherever possible. All suspensions are regularly reviewed by the DCC and the rationale for decisions is recorded. The DCC has introduced a clear direction that resignation or retirement during investigations will not be authorised.

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

Investigating corruption

The force proactively, but not regularly, identifies vulnerable staff or groups vulnerable to corruption. Analytical and research staff complete such work as a response to intelligence received or for an ongoing investigation. Proactive work, however, is reduced due to the limited capacity within the ACU. The PSD provide complaints data to local managers that identifies individual, team and complaint trends from complaints data.

Vetting arrangements comply with the national vetting policy and identifies corruption risks at the recruitment stage for officers and staff. The force revisits individual vetting on promotion to senior ranks or posting to sensitive and vulnerable roles. The force has a vetting policy and associated vetting procedures. HMIC found evidence where vetting had led to individuals who had been passed for promotion having their promotion cancelled.

The force monitors force systems and social networking sites and takes action when appropriate but there is a gap in using software to automatically search systems to identify misuse of systems. The force has only five licences to enable proactive monitoring of force systems. Each licence only authorises the monitoring of one computer at a time which severely reduces the force capacity to proactively monitor officer and staff compliance with legislation and policies.

The force has a social media policy and handbook that has clear guidance and the force has published articles on the intranet and through the Offbeat magazine reminding staff of their responsibilities for both force and private social media use.

The corporate communications team monitors force accounts and do regular open searches of private social media accounts where staff refer to Surrey Police. If any concerns are found they are referred to the PSD to investigate. Proactive work in this area is limited as the force does not have an automated system that can search for specific words to assist in searching the vast range of social networking sites. The force is currently purchasing such a monitoring system.

The force carries out regular audits of chief officer, senior officer and police staff equivalent diaries against the gifts and hospitality register, and expense claims. This task is completed by the chief officers' staff office with the DCC managing any identified issues.

The force uses with cause substance testing, and intelligence-led integrity testing, but does not conduct random tests to identify corruption. The force completes the statutory testing of new recruits prior to joining and during their two-year probation period. The force completed one intelligence-led test in the 2013/14 financial year, and while it has a policy that includes random testing, the force has not completed any such tests for some time. This is a conscious decision as when random tests were conducted all were negative. Many staff

believe that random tests are still being conducted and staff associations are supportive of this prevention activity.

The force has not taken steps to ensure that organised crime investigations have not been compromised by corruption risks. They have taken very recent steps (August 2014) to ensure that forthcoming operations are mitigated from the risk of corruption. The Surrey and Sussex joint serious and organised crime unit (SOCU) has produced a procedure that has an eleven-point set of actions describing how the SOCU and the two PSDs will manage the risk of operations being compromise or corrupted.

The force ensures the effective security of systems, exhibits and case papers. Surrey has an information security policy and the force security manager works within the PSD. The policy outlines the general principles of information security in order to safeguard sensitive information and counter any potential threats. The policy also outlines potential threats and vulnerabilities for staff to consider, the need for confidentiality and security of information, working practices that will assist in the security of information and what action to take if an individual suspects a breach.

Intelligence

Intelligence gathered or received is appropriately analysed, graded and developed before being actioned. The ACU staff complete intelligence actions in a structured way. Officers and police staff have a good understanding of how to gather and manage intelligence. The capacity in the ACU means that the analysis being completed is as a reaction to information or as a response to an ongoing investigation, rather than proactive activity.

Tasking and co-ordinating processes, via a bi-weekly meeting jointly held with the Sussex Police PSD, are in place at which corruption issues are efficiently and effectively managed.

The force does not effectively identify multiple suspects or multiple offences by a single suspect, although some analysis is completed for ongoing investigations such as data protection offence cases. The analyst within the ACU has the capability to support this work but not the capacity.

Capability

The PSD and ACU have access to specialist assets when required with the head of the PSD and their deputy having good knowledge of investigation tactics and resources available within Surrey and those joint units with Sussex. The force has accessed specialist resources from the Metropolitan Police Service in the past.

The recent peer review of the PSD by Thames Valley Police highlighted the limited capacity of the ACU. HMIC found that the resource levels of the ACU means they cannot deal with the current level of intelligence and have to make assessments based on staffing availability. The force is discussing a possible merging of the PSD and ACU with Sussex which has the potential to pool resources, reduce support costs and increase operational capacity.

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 performance of the PSD and ACU is regularly monitored by the force and includes the timeliness and quality of handling complaints, investigations, decision-making, outcomes and appeals. The PSD provides data for department performance meetings and for the force performance structure through the workforce planning and performance board that is chaired by the head of HR.

The head of the PSD is also the corruption lead for the force, and they have a clear and direct reporting line to the DCC as the appropriate authority. There is a formal bi-weekly meeting that has recorded actions, and an informal process that enables the head of the PSD to raise any immediate issues or discuss sensitive cases with the DCC.

The force disseminates lessons learned to officers and staff but does not do so effectively. The force circulates the IPPC bulletin through the intranet and will highlight individual lessons through email. Staff have an awareness of the lessons learned bulletin, but some were not able to identify where the bulletins can be found. Staff do acknowledge that the intranet is used to circulate lessons learned from incidents and investigations but there is a lack of understanding as to what individuals actually have to do in response to these.

Cases are appropriately referred to the IPCC in accordance with the statutory guidance and this was confirmed through the checks undertaken as part of the inspection.

Recommendations

- **Within six months, the force should ensure it has sufficient capability and capacity to enable the recording and conducting of timely and proportionate investigations into public complaints.**
- **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 that it has the proactive capability to effectively gather, respond and act on information which identifies patterns of unprofessional behaviour and corruption.**