



Inspecting policing
in the public interest

Police Integrity and Corruption

Sussex Police

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

Sussex Police has made good progress in communicating to all staff the importance of acting with integrity at all times while fulfilling their duties. The force has implemented systems to prevent and detect corruption effectively. The force also publishes data to show it is transparent in the way gifts, hospitality and business interests are dealt with. Investigations and the rationale for decisions in disciplinary cases are clearly recorded and carried out in an effective and timely manner.

Summary

There is a clear ethical foundation within Sussex Police driven by the chief constable's commitment to embed force values and integrity. Staff understand the boundaries between professional and unprofessional behaviour and are generally confident to challenge wrongdoing. While some staff expressed concern that it may be possible to identify people using the anonymous reporting system, the force has clearly maintained its commitment to embedding ethical values throughout the organisation.

Supervisors, particularly those on the frontline, set standards and expectations for their teams. Staff feel that the visibility and demonstration of ethical values by second-line managers and senior officers is not as clear as that of sergeants. The force has been highly transparent in its approach to tackling unethical and unprofessional behaviour, with chief officers being clear on their stance. The force has made good progress ensuring that gifts and hospitality are recorded appropriately. However many staff do not understand the need to report inappropriate associations.

Investigations are carried out to a good standard with well-documented rationale and are completed within a reasonable timeframe. Intelligence is effectively gathered and analysed to prevent and detect corruption. While the force reviews cases, it needs to implement an effective system that captures lessons learned from previous events and should include dissemination of the Independent Police Complaints Commission (IPCC) bulletin. The force also needs to ensure that resource levels in the anti-corruption unit (ACU) can provide both a reactive and proactive capability.

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

Two areas for improvement were identified in 2012:

The force has implemented systems to cross-reference gifts/hospitality and chief officer diaries with procurement to ensure transparency and prevent corruption.

The media and integrity policy has been updated, and those who need media training receive an input from the 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 clear leadership from the chief officer team.

Staff felt confident to report wrongdoing and that the force would support those who do.

The force has strong processes to manage offers of gifts/hospitality and publishes the register.

The force needs to clarify and promote its policy on notifiable associations to increase understanding within the workforce.

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

Investigations are effective and timely.

The force should implement a process to ensure integrity and vetting issues are considered for senior command course and higher potential development scheme candidates, prior to forwarding applications.

Staff lack confidence in the confidentiality of the 'break the silence' anonymous reporting system.

The force should implement a process that ensures lessons are learned.

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

The ACU has instigated some notable proactive work through the development of the potentially vulnerable subjects system; however, there are concerns that the ACU will be unable to translate this work into proactive activity

The force has effective governance structures to ensure oversight of corruption issues.

The force analyses and actions intelligence on corruption effectively.

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 needs to ensure that capacity in the ACU is sufficient to undertake proactive and reactive work.

The force/constabulary in numbers



Complaints

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

791

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

15.6

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

15.7



Conduct

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

69

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

1.4

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

2.6



Business interests

Applications in 12 months
to March 2014

241

Approvals in 12 months
to March 2014

213



Resources

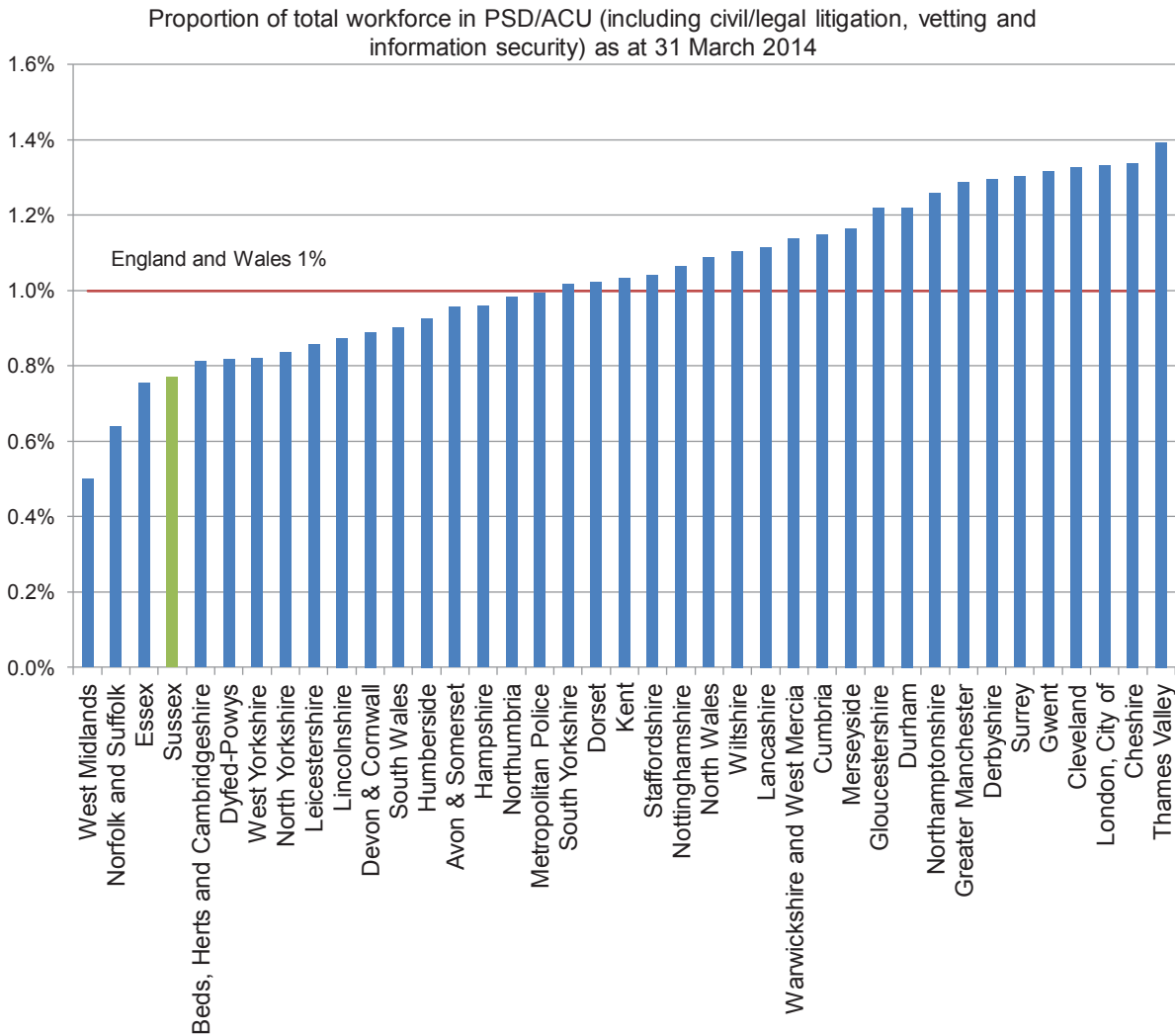
Proportion of workforce in
PSD/ACU

0.8%

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 Sussex Police in 2012 HMIC found the following two areas requiring improvement:

- In 2012 there was no evidence of a monitoring system in place to cross-reference procurement registers with gifts and hospitality registers to ensure the integrity of the process (e.g., to look out for instances where a company provides hospitality, and then is awarded a contract).
- In 2012 the inspection team found that there had been some media training following the 'Without fear or favour' report. This had been targeted at staff that were most likely to come into contact with the press. Changes to the policy are communicated by email, intranet and through training days. This has helped raise understanding of integrity issues but there is no mechanism to check that officers and staff have understood the changes.

Monitoring systems to cross-reference procurement registers with gifts and hospitality are now in place, achieved through regular scheduled meetings between the head of the professional standards department (PSD) and the head of joint procurement. HMIC has been advised that in the future there is an intention to include the head of Surrey Police PSD in these meetings to provide oversight and scrutiny collaboratively. There is no checking against unsuccessful procurement bids and the force should take steps to rectify this. The quarterly police and crime commissioner (PCC) scrutiny meeting attended by the head of the PSD conducts an intrusive review of gifts and hospitality and business interests with chief officer diaries.

The media and integrity policy has been updated, and those who need media training receive an input from the media department.

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

Sussex Police is making good progress in embedding professional behaviour across the force. There is clear leadership from the chief constable to instil integrity and force values and this is recognised by staff. The chief constable's expectations and values are understood fully and this enables all staff to identify unprofessional behaviour. In order to embed values and expectations across the force the chief constable uses senior leader forums, chiefs' briefings, video blogs and messages via the force intranet. Staff associations and unions welcome the unequivocal approach of the chief constable and feel that the 'time to think' events have raised awareness and provoked discussion on a number of sensitive areas.

Officers and staff have an awareness of the boundaries between professional and unprofessional behaviour and understand how it affects both the public and their colleagues. HMIC found that in general there was an understanding and confidence to recognise, refrain from and challenge unprofessional behaviour. Examples of staff challenging and reporting unprofessional behaviour during the inspection were provided and the majority of first-line supervisors told us they would take appropriate action when required. These illustrated the increasingly supportive culture developing within the force. Chief officers have been supportive of the publication of outcomes from misconduct hearings. These have been read and understood throughout the force. The force has reinforced boundaries by including PSD presentations into new entrant training, and sergeant and inspector leadership modules. At divisional level there is some evidence that the force is testing staff's understanding of acceptable behaviours by dip-sampling body-worn video footage. The force should ensure that this practice is applied consistently.

Expectations on ethical and professional behaviour are found in policies and procedures such as the police staff handbook, and the code of conduct for staff. Audits have been conducted in West Sussex; however, it was unclear if this is a systematic process. Force values and the Code of Ethics are incorporated into force plans, the leadership framework and the individual performance management process.

There is evidence that some but not all leaders, including first-line supervisors, lead by example and demonstrate their personal commitment to ethical behaviour. HMIC found that in the main, supervisors within the force are setting standards and expectations for their teams. Staff feel that first-line supervisors are the primary advocates of ethical standards. They feel that the visibility and demonstration of ethical values by second-line managers and senior officers is not as pronounced as that of sergeants. The force recognises the importance of the pivotal frontline supervisory roles and has introduced PSD training into the sergeant and inspectors' leadership training. Supervisors have access to a range of management and leadership training however they are not mandatory. They can also attend

human resource workshops and coaching sessions, however, divisional staff have little knowledge of this.

The plans to communicate and embed the Code of Ethics are not clear. The force acknowledges that the introduction of the code did provoke some degree of discussion both within the force and in their collaborative arrangements with Surrey Police. The force is now committed to a shared and phased implementation of the code with Surrey Police, and the head of PSD is responsible for the delivery, which is being co-ordinated through the recently formed joint integrity and professional standards board, chaired by the Sussex deputy chief constable (DCC). The first phase of the Code of Ethics implementation has been delivered through a joint force-wide email from both Surrey and Sussex chief constables introducing it to the workforce. The initial force messages have been targeted at supervisors, equipping them with a range of scenarios to help their understanding. In future the force intends to increase communication of the Code of Ethics by the chief officer team.

There is a policy outlining the obligation to declare any change in personal associations and relationships, but it is not clear and staff awareness across the force is inconsistent. Reference is made to notifiable associations in a number of force policies, the police staff handbook, the code of conduct for staff, and the force vetting policy. The force has identified criminal associations as one of four key priority threats for the organisation in the joint Surrey and Sussex anti-corruption strategic threat assessment. The responsibility for managing notifiable associations currently rests with the vetting department. The force remains unsighted on some existing associations and this warrants further understanding as one of the strategic threats.

Recommendation

Within six months, the force should ensure that it carries out regular audits of notifiable associations to identify potentially corrupt activity.

The National Decision Model (NDM) is used in the force, however not all officers and staff are trained and understand how it should be applied. Police officers in more specialist roles are trained and understand the principles. It is now being included routinely in sergeants and inspectors' leadership and personal safety training, but this training is not given to police staff. Training on ethical and professional behaviour runs as a thread through training rather than as a distinct training programme. An over-reliance on computer-based learning packages is not welcomed by staff or perceived to be the best mechanism for learning.

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). The chief constable and PCC conduct monthly accountability webcasts which provides additional scrutiny by the public. A representative from the office

of the police and crime commissioner (OPCC) attends the joint IPCC and PSD meetings. At force level, the PCC also has quarterly scrutiny meetings with the head of the PSD where complaints, PSD performance, the registers for gifts and hospitality and expenses, and the force confidential mechanism ‘break the silence’ are reviewed. An OPCC representative also attends the professional standards board.

Integrity issues are governed by the recently formed professionalism and integrity board (PIB), a joint meeting between Surrey and Sussex Police chaired by the Sussex DCC. It provides oversight of misconduct, integrity and professionalism issues. During inspection we found only one meeting had taken place and no minutes were available. Aside from the professional standards board, the DCC is involved in a regular meeting between the head of the PSD and the head of human resources (HR). The DCC is also sighted on the joint anti-corruption strategic assessment with an accompanying control strategy which identifies four key priorities for both forces in respect of corruption.

Understanding integrity

The force has carried out some work to understand how integrity issues (including misconduct and unprofessional behaviour) affect public trust, through surveys of officers, staff and the general public, but not youth groups. The force has taken steps to understand integrity issues across the force using a staff survey which had a 72 percent completion rate. The force intends to communicate the results of the staff survey in a number of ways: a video message by the Chief Constable detailing themes from the survey; generating action plans through a joint chief officer team and force equalities board meeting; and finally by cascading the results out to divisions and directorates to generate local level action plans. The force has also conducted local neighbourhood surveys and a Sussex user satisfaction survey, the latter incorporating relevant integrity-based questions.

Details of all occasions where staff are offered gifts or hospitality are recorded in a centrally held repository (including where the gift/hospitality was not accepted) and are audited regularly with inappropriate entries challenged or investigated. The force’s register of gifts and hospitality is held centrally on the Centurion IT system overseen by the vetting department and subject to active review and challenge by the head of the PSD. The head of the PSD also conducts quarterly meetings with the head of joint procurement to review entries regarding procurement and contracts awarded. The register of gifts and hospitalities is published on the force website. Staff have a comprehensive understanding of their reporting and recording responsibilities, and messages from the force are circulated regularly reminding staff of their obligation to comply with the policy

Details of all occasions where staff have applied for authorisation for a business interest are recorded fully in a centrally held repository (including where the application was not

authorised) and managed by the vetting department. All business interest applications are reviewed by the head of the PSD, who acts as the final decision-maker following review from line managers, the vetting department and the ACU. The force discusses more complex cases with HR, the staff associations and unions before making a final decision. All authorised applications are subject to annual review and shorter review timescales are set where appropriate. All rejected applicants are advised of the decision during an individual interview with the head of the PSD. There is some evidence that the force re-assesses rejected business interest applications to ensure the decision has been complied with. However this re-assessment only takes place if intelligence is received or an issue is identified by the member of staff's line manager. The register of business interests is published on the force website, listed by division or department but not rank, grade or role. The public register also contains the number of applications along with their status (cancelled by applicant, declined, granted or pending). The expenses of chief officer and police staff equivalents are published on the website, broken down into category type and amount. The chief officer team are supportive of the drive to publish the outcome of gross misconduct hearings, and HMIC found that publication of such messages is welcomed by staff.

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 matters are considered before transferring staff to specialist roles and promotions in some, but not all, cases. Applications for courses such as the strategic command course, and the high potential development scheme are not included in this process.

There is some evidence that the force reviews how investigations are assessed, investigated, and recorded to ensure that all staff, irrespective of rank or role are treated fairly and equally. The PSD is responsible for the investigation of all cases of officer misconduct, while the HR casework team investigates all police staff misconduct cases. The force conducts a severity assessment to determine whether each incident constitutes a criminal offence, or justifies the bringing of disciplinary action. All severity assessments are completed or ratified by the head of the PSD. For police officers, the PSD has an agreement with the Police Federation to ensure there is a consistent process and outcome. For investigations delegated to division to investigate and locally resolve, there is little PSD oversight. Supervisor workshops and coaching by the HR casework team take place to assist, but HMIC found these to be ad hoc and inconsistent. The HR casework team have a consistent approach for police staff investigations. Both the PSD and the HR casework team discuss cases and issues at the PSD tactical tasking and co-ordinating meeting. HMIC conducted a dip-sample of a small number of the PSD files and found these to be of a consistently high standard. The rationale for decision-making was clear and there was a good level of scrutiny by the head of the PSD.

'Break the silence' is the force anonymous reporting mechanism. It is supported by a clear policy for staff to report wrongdoing but HMIC identified reluctance across the force to use it. Unfortunately there is a perception that the 'break the silence' mechanism is not anonymous, with officers and staff believing they are identifiable through the PSD IT systems. HMIC is confident that there is integrity in the process but the force needs to do more to reassure staff that it is truly anonymous.

The force responds to reports of wrongdoing in an effective and timely manner. The PSD has adopted a 90-day resolution timescale for both public and internal investigations, with evidence of supervisory oversight of all outstanding live cases. The PSD also enforces a maximum 48-hour time limit for responding to 'break the silence' reports. During inspection, HMIC found that staff highlighted a positive relationship with the PSD and a belief that complaints were dealt with in a timely manner.

Cases are appropriately referred to the IPCC with the force confirming that it adheres to the IPCC statutory guidance in relation to mandatory and voluntary referrals. HMIC dip-sampled a small selection of the PSD case files; however none required referral to the IPCC. The

files reviewed displayed a consistently high standard, with cases referred to the Crown Prosecution Service appropriately. In those cases resulting in no further action, the decision was supported by clear and well-documented rationale.

There is a mandatory process in place to capture lessons learned at the end of an investigation or hearing; however, there is no evidence that this information is circulated across the force to reinforce acceptable standards of behaviour. Some immediate and specific learning points have been disseminated; however, there is no evidence to suggest there has been wider organisational learning. The force does not use the IPCC 'learning the lessons' bulletin to disseminate learning and does not encourage or collate responses.

Professional standards training and resourcing

All staff within the PSD and the ACU receive training for their role and bring a mix of skills to the team. Staff within the PSD and the ACU have appropriate training and accreditation. All police staff investigators will be attending bespoke investigation training in November 2014.

Succession planning takes place in the PSD and the ACU. The force has introduced attachments within the ACU and the PSD in order to identify potential candidates ahead of any vacancies.

The PSD is sufficiently qualified but not sufficiently resourced to enable a proactive and preventative capability. It is clear that where intelligence prompts action, the force responds and uses either its own staff, or calls upon specialist and covert assets. There is recognition that the PSD's ACU is under-staffed, however, the force is confident that this capacity will be bolstered through collaborative working with Surrey Police.

Misconduct hearings are conducted to ensure they are transparent, effective, efficient and legitimate, and include the use of an appropriately qualified presiding officer who is independent of the person being investigated. The force has invested in training from a barrister for all those involved in the misconduct hearings process. HMIC found no evidence of any concerns regarding how hearings are conducted.

The force makes use of fast-track dismissal. The force states that the fast-track process is considered in all appropriate cases and confirmed that in the last 12 months four cases were fast tracked with the support of the chief constable. Staff associations and unions are supportive of the process.

Quality assurance

The force regularly audits decisions in hearings and meetings resulting from allegations of misconduct or unprofessional behaviour against officers and staff. The DCC retains oversight on hearings with the presiding officers' debrief highlighting any relevant issues. All police staff hearings are supported by an HR advisor to ensure consistency.

Regular auditing takes place within the PSD and the HR department to ensure that investigations are justifiable, dealt with at the right level and escalated or de-escalated appropriately. Within the PSD there is strong oversight of all ongoing cases. In the PSD files sampled, HMIC found strong rationale for decision-making evident throughout the cases. For police staff, HR caseworkers are allocated to cases to ensure consistency. For cases dealt with by the districts, HR advisors are assigned to provide oversight appropriately.

All investigations conducted by the PSD are quality assured by the detective sergeant or detective inspector through daily oversight or the bi-weekly formal meetings. The PSD also applies a 90-day resolution limit for all misconduct investigations. These are monitored on a monthly basis by the head of the PSD. The PSD retains responsibility for the investigation of officer misconduct/gross misconduct cases along with all criminal cases linked to police staff. All police staff cases are overseen by a HR caseworker, with the head of the HR casework team providing information to the PSD tactical tasking and co-ordination group (TTCG).

There is a clear policy and consistent decision-making on suspension, resignation and retirement during an investigation. For all officer suspensions, the DCC or chief constable is the final decision-maker. For all police staff suspensions, the head of HR is responsible for the final decision. The DCC conducts monthly force suspension reviews in conjunction with the heads of the PSD and HR. HMIC dip-sampled a small number of retirement and resignation files and found that in those cases where a decision was made to accept an officer's resignation, all relevant issues were considered. Although the quality of the files was good, there was no recorded evidence of chief officer oversight and authorisation.

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

Corruption investigation

The force identifies and manages threat, risk, and harm from corruption as part of its governance structure proactively and effectively. The process includes the assessment of any risks and proactive action to mitigate those risks. However, the monitoring procedures in which actions are tracked and action owners held to account are in their infancy. In collaboration with Surrey Police, the force has produced an anti-corruption strategic threat assessment identifying four key priorities: unauthorised systems access; disclosure of information; targeting of vulnerable people; and criminal/notifiable associations. It is intended that the strategic threat assessment will inform a monthly joint Surrey and Sussex PSD TTCG. This new format is yet to start.

The force identifies vulnerable staff/groups regularly and proactively. The ACU has developed and refined the potentially vulnerable subjects system. Although initially conceived in 2002, the recently revamped system now enables the force to identify police staff, officers and members of the wider police family that may be vulnerable to corruption and trigger a preventive intervention. There is a structured governance arrangement in the ACU supporting the process. The force is confident that potentially vulnerable staff are identified, appropriate decisions are made, and regular reviews are progressed through the monthly TTCG.

Vetting arrangements comply with the national vetting policy and corruption risks are identified at the recruitment stage for police officers and staff, and are revisited on promotion to senior ranks or transfer to specialist roles.

The force monitors some systems and social networking sites and takes action when appropriate. The force's corporate communications and public engagement department carry out limited social network monitoring principally to maintain public confidence and the reputation of the organisation, although inappropriate content is referred to the PSD. The ACU carries out audits of force systems and social network accounts, however, this activity is only triggered by referrals from the vetting unit. In addition, vetting forms have recently been updated by the force to enable staff to declare their social media links, and sign a declaration that the organisation may carry out proactive searches on the accounts.

The force uses with cause but not random drug testing to identify corruption. The results are not circulated to staff. With cause drug testing is managed within the ACU who ensure that aftercare letters are circulated to the appropriate division. There is no evidence that any further information is circulated across the force.

The force ensures that organised crime investigations are not compromised and corruption-proofs forthcoming operations. The force recognises the inherent risks of corruption and compromise in its intelligence-gathering and covert operations, and is considering a business case to place an appropriately accredited officer in the joint specialist crime command to manage this. The ACU confirmed that there is a strong relationship with force senior investigating officers which ensures that organised crime investigations are not compromised. There is also a joint Surrey and Sussex organised crime group corruption-proofing policy.

The force ensures the effective security of systems, exhibits and case papers. There is an information security policy, which sets out clear requirements and authorisation levels to ensure the effective management of information security. Security of systems is the primary focus of the quarterly force security group meeting. In addition the force applies Operational Elemental to test the security of premises, exhibits and case papers, referring any lapses to the duty critical incident inspector.

Intelligence

Analysis is carried out by Sussex Police to identify trends. The ACU has access to a wide range of information sources which provides a good platform for the force to identify patterns of inappropriate behaviours.

The force gathers actionable intelligence on corruption and grades it in compliance with the authorised professional practice and the national intelligence model proactively but not regularly. The ACU receives approximately 650 pieces of intelligence annually, and maintains productive relationships with the three dedicated force controllers, crimestoppers and the regional organised crime unit, all of which generate referrals to the unit regularly. Intelligence is analysed, graded and developed before being actioned. Analysts identify multiple suspects and multiple offences by a single suspect using the iBase system.

Capability

The PSD and the ACU generally have access to specialist assets when required. This is achieved through constructive relationships with force senior investigating officers. This enables them to access an approved list of enhanced vetted colleagues. The ability to request additional assets and accredited individuals through the force's collaboration with Surrey Police is in its early stages of development.

The ACU has limited capability and capacity to carry out proactive work. HMIC was advised that the unit size has been significantly reduced, with plans to increase future capacity through collaboration with Surrey Police. The unit has instigated some notable proactive work through the development of the potentially vulnerable subjects system; however, there are concerns that the ACU will be unable to translate this work into proactive activity. The force has already taken steps to identify their four strategic threat priorities; however, there is no evidence that in two of the key threats – misuse of computer systems and disclosure of information – it investigates these areas proactively. The force does conduct robust reactive investigations. The force must ensure that the current size of the unit and the momentum behind collaboration with Surrey does not preclude the effective, proportionate and proactive investigation of corruption.

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 has a tasking and co-ordinating mechanism in place within the ACU at which corruption issues are considered, recorded and action owners held to account. Daily oversight is conducted on an informal basis by a detective sergeant in the ACU, with a more formal tasking meeting occurring bi-weekly where actions are considered, directed, and recorded on the iBase system. Investigation plans are authorised following appropriate risk assessment and supervisory oversight. Weekly team meetings support the formal bi-weekly meetings and further oversight is applied through the department level TTCG. The performance of the PSD and ACU is monitored regularly by the force and includes the timeliness and quality of handling complaints, investigations, decision-making, outcomes and appeals. The head of ACU has a direct reporting line to the DCC with monthly formal meetings.

Recommendations

- **Within six months, the force should ensure that it carries out regular audits of notifiable associations to identify potentially corrupt activity.**
- **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.**