



Inspecting policing  
in the public interest

# Police Integrity and Corruption

Thames Valley Police

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

The chief officer team provides strong leadership and the ethical stance of the chief constable and DCC is recognised across the force. The force is committed to embracing the Code of Ethics. There is good evidence of staff challenging unprofessional behaviour, and effective systems are in place to identify wrongdoing. The processes for identifying and addressing the risks posed by misconduct, unprofessional behaviour and corruption are effective.

### Summary

The chief officer team provides strong leadership and the ethical stance of the chief constable and DCC is recognised across the force. The force is committed to embracing the Code of Ethics. There is good evidence of staff challenging unprofessional behaviour, and effective systems are in place to identify wrongdoing.

The force has made good progress in addressing the four areas for improvement identified in the 2012 inspection, and the quality and scope of the new integrity training are impressive. However, more work needs to be done to ensure that staff understand the detail of some key policies to protect the integrity of individuals and the organisation.

The processes for identifying and addressing the risks posed by misconduct, unprofessional behaviour and corruption are effective. Investigators are capable and well trained and the quality of decisions made is good. However, improvements should be made to support and provide further training for supervisors; enhance the professional standards department's (PSD's) preventative role; and improve identification of vulnerable groups and individuals.

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

The force has made good overall progress against the four areas for improvement identified in 2012.

Social media scanning extends beyond approved Twitter accounts to include other social media, and its used to identify inappropriate entries made by staff. While some progress has been made to ensure that more staff are aware of the force social media guidance, inappropriate use continues.

**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 and consistent promotion of ethical standards by the chief constable and the chief officer team.

The force is committed to introducing the Code of Ethics.

Staff are generally well aware of the professional behaviour that is required, and understand the implications of failing to meet these standards.

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

The process for assessing the threats, harms and risks posed by unprofessional behaviour and misconduct are generally effective, and the response to these risks is well managed.

More analysis should be undertaken to identify individuals and groups who may be susceptible to unprofessional behaviour.

Professional standards investigations are good.

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

The force level risks posed by corruption are identified and well managed.

A counter-corruption unit (CCU) is resourced sufficiently with staff qualified to fulfil its reactive investigative role.

CCU investigations are proportionate and effective.

However, although there is compliance with national vetting policies, the wider analysis undertaken to identify individuals and groups who may be at risk of corruption could be enhanced.

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

Progress has been made in promoting understanding of force guidance on the recording of acceptance or refusal of gifts and hospitality. However, some staff remain uncertain, and recording is inconsistent.

The force is delivering an integrity training package which includes a distance learning element and a half-day training course.

A large number of staff have been trained and the quality of the training is impressive.

**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?**

Internal and external oversight mechanisms are robust. However, the professional standards department (PSD) could do more to communicate messages more clearly and share lessons learned more effectively.

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

Misconduct processes at force level are conducted appropriately but greater oversight is needed at a local level.

There is clear evidence of unprofessional behaviour being challenged, but some supervisors feel isolated dealing with and reinforcing integrity issues.

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

# The force/constabulary in numbers



## Complaints

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

**998**

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

**13.5**

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

**179**

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

**2.4**

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

**2.6**



## Business interests

Applications in 12 months  
to March 2014

**224**

Approvals in 12 months  
to March 2014

**206**



## Resources

Proportion of workforce in  
PSD/ACU

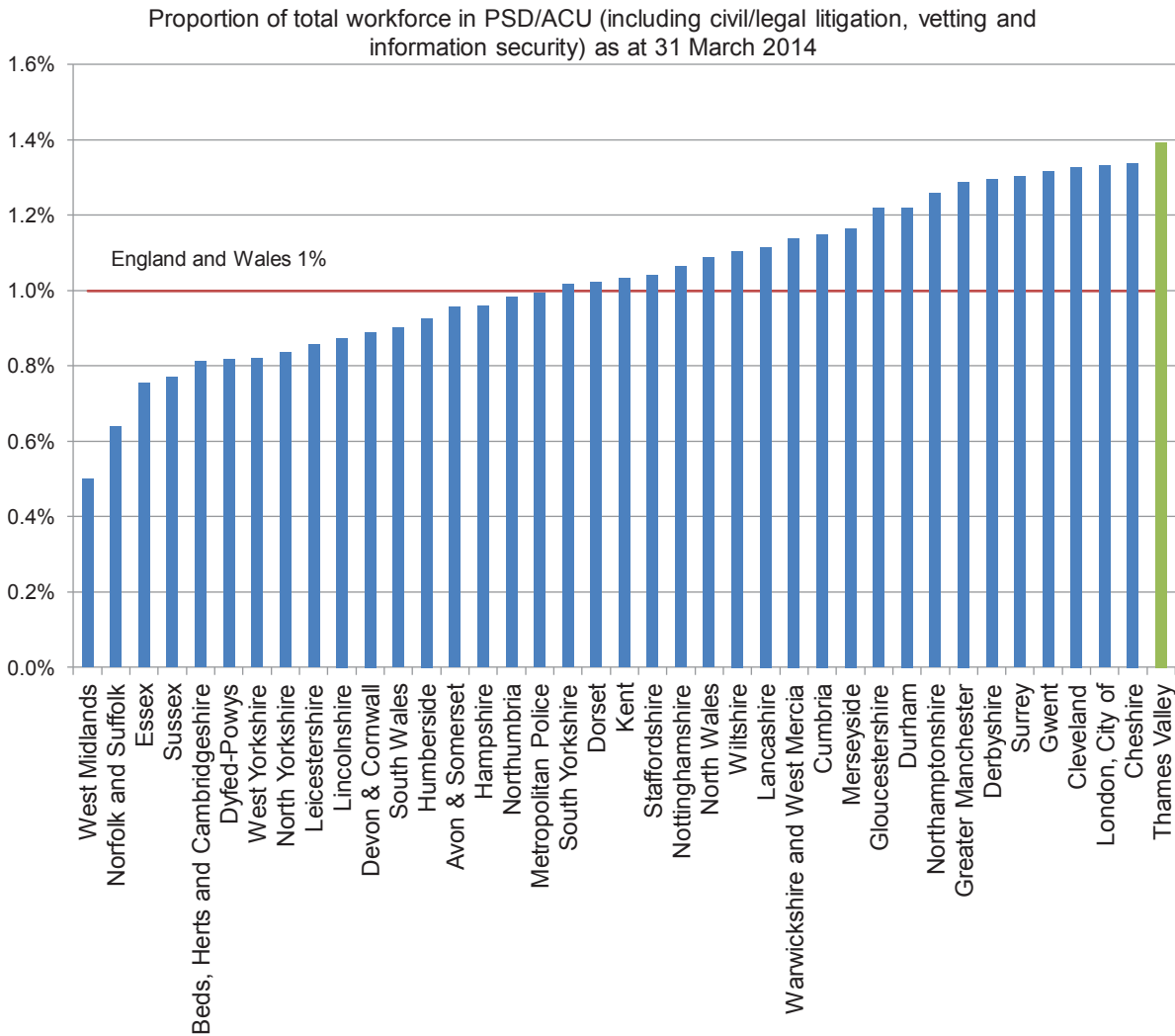
**1.4%**

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, London, December 2011. Available from [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, London, December 2012. Available from <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, Coventry, 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 Thames Valley Police in 2012, HMIC found the following four areas requiring improvement:

- To extend and improve social media scanning to identify and prevent inappropriate entries and disclosures
- To review and clarify social media guidance and ensure that it is widely disseminated
- To ensure that all staff are aware of the force gifts and hospitality guidance
- To introduce a mechanism to check that staff understand the integrity guidance and training that is provided

The force has made good progress in extending social media scanning, using a graph search tool. This enables scanning beyond approved Twitter accounts and includes Facebook. It is used to identify inappropriate entries made by staff.

The force recognises the risks posed by staff using personal social media and this is reflected in its social media policy. Training has been provided and articles in force publications have reinforced the force's expectations in respect of social media. However, inappropriate use of social media continues, and efforts to remedy this must continue.

Good progress has been made to promote understanding of the force guidance on the recording of acceptance or refusal of gifts and hospitality. Despite an inconsistent understanding of the precise requirements for accepting and recording gifts or hospitality, there is a good appreciation of the need to consider whether it is appropriate to accept what is offered and the importance of informing line managers of the action taken. There was limited evidence of refusals being recorded or staff being aware of the requirement to do so. More work is needed to promote full understanding of the policy.

Progress on the delivery of integrity training and ensuring that the workforce understands the guidance and training that is provided is good. The force integrity training includes an internet-based distance learning element and a half-day training course. This encourages a clear understanding of the force's expectations about ethical behaviour and professional standards. At the time of the inspection, about half the police officers and police staff had been trained, and the programme for completion of the training was clear. The force understands the need to continue to reinforce these important messages once this programme is complete. The quality of the training is impressive, providing a clear opportunity for open discussion. The understanding of all those involved is tested throughout the course.

# 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

HMIC found strong and effective leadership being shown by the chief constable and deputy chief constable (DCC), and other chief officers are also actively involved in promoting integrity and high professional standards. The chief constable and DCC are committed to implementing the Code of Ethics, viewing it as a means to promote ethical behaviour and prevent unprofessional behaviour, rather than as a disciplinary tool.

The force has thorough internal and external governance and oversight mechanisms in place. A robust internal governance structure exists through the force security committee chaired by the DCC, and the integrity sub-group chaired by the head of professional standards. HMIC had access to minutes of both groups and there is evidence of tasks allocated and action holders held to account. These processes ensure that integrity issues are actively monitored by chief officers and other senior officers. As part of this governance structure, the force identifies and manages threat, risk and harm from misconduct and corruption regularly and effectively.

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 force expects supervisors to provide leadership to instil and promote ethical behaviour. This is reflected in the guidance provided to staff, and evidenced in the large number of examples where unethical and unprofessional behaviour is appropriately challenged. This is an indicator of the positive attitude we found towards behaving appropriately at all times within the force.

The performance of the professional standards department (PSD) and counter-corruption unit (CCU) is regularly monitored by both the chief constable and the DCC. It includes the timeliness and quality of handling complaints investigations and decision making, and the outcomes and appeals from finalised cases.

The head of the CCU also performs the role of deputy head of the PSD. This provides resilience and helps communication. The head of the PSD has a clear and direct reporting line to the DCC. This ensures effective liaison, and demonstrates the importance of these issues to chief officers.

## Understanding integrity

Staff are generally well aware of the boundaries of professional behaviour and understand how professional behaviour affects both the public and colleagues. Most police leaders, including first-line supervisors, demonstrate a personal commitment to promoting understanding and compliance with ethical behaviour and standards.

Understanding is also being promoted through the introduction of the Code of Ethics. A group to support the implementation of the Code has been established with appropriate representation from all ranks and roles including senior officers. Although the force is clear on the broad parameters for the introduction of the Code of Ethics, at the time of the inspection, timescales for implementation were not clear. However, the force intends to have a detailed medium to long-term action plan ready by July 2014.

The chief constable uses the senior leaders' forums to deliver messages on topics such as integrity and the introduction of the Code of Ethics. She also uses audio video messages and 'ask the chief' sessions on the force intranet.

Ethical policy has been translated into procedure through forums such as new entrant inductions with chief officers discussing standards and values, and operational officer training in Oxfordshire using theatre groups to spark discussion on ethical issues. Chief officers also attend training days to promote the understanding of integrity and high professional standards.

High expectations of ethical and professional behaviour are also apparent in the force's policies. Although staff are generally aware of the ethos and directions contained in policy, there is a lack of consistent understanding across the force. In particular, this was found in policies relating to inappropriate use of personal social media, notifiable associations (which includes definitions and details on boundaries of association, compromise and reportable association), and gifts and hospitality.

## Recommendation

**Within six months, the force should ensure that it has communicated to all staff the requirements to comply with policies relating to notifiable associations, secondary employment, business interests, and gifts and hospitality.**

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

Misconduct hearings are transparent, effective and efficient, and include the use of an appropriately qualified presiding officer, who is independent of the person being investigated. Access is provided to a legal adviser to ensure the legality of the proceedings. The force has invested in training from a barrister to support those on panels and managing misconduct proceedings. The independence of the panel is maintained and, when necessary, the force has reciprocal arrangements with another force for an assistant chief constable to attend to ensure fairness and transparency. Staff associations have no concerns about the transparency and consistency of decision making throughout misconduct proceedings. This is a clear strength for the force. However, there is limited evidence that the force audits decisions from hearings to identify trends and lessons to be learned.

Misconduct and unprofessional behaviour are appropriately considered when decisions are made regarding transfers to specialist roles and for all promotions. Movement between local policing areas is also subject to checks on conduct, performance and attendance. All transferees from other forces are subject to similar checks. However, it is not clear whether applicants for the high potential development scheme or strategic command course are subject to the same checks.

Good processes are in place to enable staff to report misconduct, unprofessional conduct or potential corruption both overtly and covertly, not only through line managers but also through a confidential telephone line. The force responds to reports of wrongdoing by staff in an effective but not a timely manner. There was also a degree of concern expressed by staff about the possibility of adverse consequences should matters be reported outside the line management chain, or regarding a person in a higher rank or grade.

There is clear commitment to promote and encourage ethical behaviour. The force is reinforcing this understanding through an ambitious ethics and integrity training programme. Interaction with staff during the inspection confirmed that this training forum has prompted constructive discussion on ethical behaviour and provided a safe learning environment in which to check understanding. However, some supervisors within the local policing areas feel a degree of isolation in dealing with and reinforcing integrity issues at a local level, a matter that the force is addressing.

Thames Valley Police makes use of fast-track dismissal when appropriate, and staff associations are supportive of the force's approach. An example provided was of the recent dismissal of an officer who had accessed confidential information through force systems and had disclosed the information to a third party. The officer was convicted of conspiracy to commit misconduct in a public office. The force convened a special case hearing and the officer was dismissed without notice.



## Professional standards resourcing and training

The PSD is sufficiently resourced and includes an established post for a trained crime analyst. Despite this, there is little evidence of proactive analysis or identification of trends. It is positive to note that continuity and succession planning is properly considered, although the head of the department has changed on a frequent basis.

The extent of engagement with the wider force on integrity issues has resulted in some criticism directed at the visibility and communication of the PSD. Although the ambitious force-wide training programme that has been embarked on provides a welcome explanation of the PSD's role, there is a need for greater departmental engagement across the force.

Some staff are critical of the PSD approach and its perceived reluctance to provide regular feedback to either supervisors or those under investigation. The force should ensure that the PSD's profile and its engagement with all sections of the organisation support a preventative approach to integrity and corruption, rather than the department simply being viewed as the disciplinary arm of the organisation.

Effective dissemination of lessons learned was found to be lacking; however, this has been recognised by the PSD and a communications strategy is in the early stages of development.

A small number of the PSD case files were reviewed by HMIC. Each investigating officer maintains individual investigation logs where investigation plans, policy decisions and supervisory reviews are maintained. HMIC has no concerns over the quality of the final decisions made in respect of each investigation.

There is limited evidence that the force routinely monitors how investigations are assessed, investigated and recorded to ensure that all staff irrespective of rank or role are treated fairly and equally. A noteworthy example is the use of severity assessment forms to help assess whether activity constitutes a criminal offence, or justifies the bringing of disciplinary proceedings. Until recently, different forms were used for police officers and police staff. A new joint officer and police staff severity assessment form has now been introduced.

The PSD is responsible for the investigation of all issues of misconduct but, when appropriate, complaints are delegated to the local policing areas or the people services directorate for action. However, there are concerns about the timeliness of investigations, particularly when delegated to local staff when there is limited oversight by the PSD. Local officers expressed concerns over the levels of support and training to enable an effective investigation.

HMIC is satisfied that cases are appropriately referred to the Independent Police Complaints Commission (IPCC). The force holds monthly monitoring meetings with the IPCC examining all covert cases.

## Quality assurance

The PSD conducts a range of checks to ensure that there is compliance with the high professional standards and integrity expected. However, the PSD oversight and quality assurance checks could be more robust, an example being the limited oversight of investigations regarding police staff misconduct carried out by other departments.

The DCC reviews all suspensions and restrictions on a monthly basis, and the approach is effective and pragmatic. However, the force only reviews misconduct hearings if the panel chair requests intervention. The force has taken steps to ensure that hearings are transparent and fair; however, the lack of a systematic audit following a hearing prevents the force from identifying trends and learning any lessons.

## Recommendation

**Within six months, the force should ensure that it has an effective process to audit misconduct hearings in order to identify trends and learn any lessons. The force should also ensure that it acts on local and national lessons learned, including communicating them to staff.**

Limited work is carried out to understand how integrity issues (including misconduct and unprofessional behaviour) affect public trust, such as via surveys of officers and staff or the general public. The force recognised this gap and worked with the University of Durham to produce a staff survey that was launched at the end of June 2014.

Staff raised a concern that limited audits are conducted to check that sanctions are consistently applied across local policing areas. However, the PSD has initiated an ethics and integrity inspection programme, with the intention of checking this annually.

Business interests are monitored, recorded and reviewed. At the time of the inspection, 805 business interests were registered with the PSD, with nine rejected during 2013/14. In local policing areas, concern has been raised over the regularity of the business interest reviews and the need to reassess interests when staff move to new roles.



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

## Corruption investigation

The force investigates all instances of suspected corruption effectively and proportionally. The counter-corruption unit (CCU) has sufficient capability and capacity to conduct intelligence-led investigations, but there is a need to consider how the force is able to seek out and address wider corruption risks.

The force carries out regular audits of chief officer diaries against the gifts and hospitality register and expense claims. However, it is not clear whether this also extends to senior officers and staff. The CCU analyst regularly reviews the chief constable's diary against the gifts and hospitality register. The force's integrity sub-group has a standing agenda item to review gifts and hospitality, and this group receives an input from the head of procurement.

## Intelligence

Force-level risks are identified and national risk assessments are considered. The force regularly gathers and acts upon intelligence in compliance with national authorised professional practice and the national intelligence model. Advice from the national counter-corruption advisory group is also followed. There are robust mechanisms in place to prioritise, allocate and review intelligence, and to ensure that appropriate action is taken.

There is no current process in place to identify individual staff who are likely to be susceptible to corruption. The force intends to introduce a monitoring system to identify risks to individuals and groups.

## Recommendation

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

Vetting arrangements comply with the national policy standards identifying corruption risks at the recruitment stage, and are revisited on promotion or transfer to specialist roles. The force conducts limited intelligence-led monitoring of personal social media networks.

## Capability

The professional standards department (PSD) and CCU have access to specialist assets. The CCU has access to surveillance and technical support specialists. Other specialist teams, such as the undercover unit, are available within the force, regionally and, to some extent, nationally.

Staff are all appropriately trained and the training includes an input on counter-corruption. However, the force recognises the CCU is predominantly a reactive department and only carries out proactive investigations when it is directed to do so by staff working in intelligence.

The force ensures that organised crime investigations are not compromised. The CCU maintains active engagement with the force's serious organised crime unit, which ensures that ongoing investigations are not compromised. The head of the CCU also attends the force's group that prioritises and allocates resources to covert operations.

The force has a drug-testing capability and uses random and intelligence-led integrity testing to identify potential corruption. Standard drug testing is carried out on new recruits. Testing staff in critical roles is within the force policy but it is not clear how often this is carried out. Examples were provided of recent intelligence-led tests that had been conducted appropriately and confidentially.

The ability to deploy protective software to monitor the use of force electronic systems remains a significant gap for the force. However, the implementation of the Niche records management system (which provides a single integrated computer system for most operational requirements, other than command and control) will aid the development of an auditable system. HMIC will monitor the force's progress in this regard.

# Recommendations

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- **Within six months, the force should ensure that it has communicated to all staff the requirements to comply with policies relating to notifiable associations, secondary employment, business interests, and gifts and hospitality.**
- **Within six months, the force should ensure that it has an effective process to audit misconduct hearings in order to identify trends and learn any lessons. The force should also ensure that it acts on local and national lessons learned, including communicating them to staff.**
- **Within six months, the force should ensure that it has the proactive capability to effectively gather, respond to and act on information that identifies patterns of unprofessional behaviour and corruption.**