



Inspecting policing  
in the public interest

# Police Integrity and Corruption

Warwickshire Police

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

Warwickshire Police has made limited progress on the area for improvement identified by HMIC in 2012. There is good understanding of the Code of Ethics across the force. Staff feel confident to challenge wrongdoing and the force responds effectively to such reports, although the audit of investigations, including lessons learned could improve. The force has limited capacity to proactively identify and deal with corruption.

### Summary

The chief constable has promoted a culture where staff are expected to take personal responsibility for their ethical and professional conduct. An acceptable culture of challenge exists and most staff feel comfortable and supported when reporting misconduct. The force has a structured plan to introduce the Code of Ethics supported by the use of the National Decision Model (NDM). The force has developed policies relating to standards of behaviour and professionalism; however, staff knowledge and understanding of some of these policies needs improvement.

The force professional standards department (PSD) had a significant backlog of complaints against police from members of the public and staff from the anti-corruption unit (ACU) are used to reduce the backlog, limiting the pro-active anti-corruption capability of the force.

The force does not effectively identify staff groups or individuals who may be vulnerable to corruption, and intelligence gathering in this regard is not proactive (this should improve as an analyst had recently been appointed). While the force responds to reports of poor behaviour or corruption, it needs to improve the capacity to proactively prevent, develop and investigate these issues.

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

One area for improvement was identified in 2012.

Although the force now has a gifts and hospitality register, there is no monitoring process to cross-reference contract and procurement registers with the gifts and hospitality register to ensure the integrity of the procurement process.

**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. Key messages are delivered using a variety of means.

Staff are prepared to challenge and report poor behaviour and feel supported when they do so.

Ethical and professional behaviour has been incorporated into relevant policies and procedures. However, no ethical audits had been undertaken.

The force needs to develop a structured training programme for integrity issues.

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

There is an identified chief officer lead.

The head of the PSD also manages other functions for both West Mercia and Warwickshire.

The force does not undertake any survey work to understand how police integrity affects trust and confidence

The force lacks prevention, investigation and proactive capacity and has a backlog of open investigations.

Promotion and selection processes are effectively monitored.

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

The force has a tasking and co-ordinating structure in place.

There is limited analysis to identify trends, although an analyst was recently appointed.

There is limited proactive identification of individuals or groups vulnerable to corruption.

There is a lack of monitoring of force systems and social networking sites.

The force does not carry out random or with cause substance testing.

**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 has adequate plans in place to effectively introduce the Code of Ethics.

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

There is a lack of effective auditing of processes to ensure effective practice is being followed.

Lessons learned are circulated but the force does not account for any actions taken in response to the learning.

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

Vetting procedures in place are good.

The force lacks capacity to proactively identify and investigate corruption issues.

Independent Police Complaints Commission (IPCC) referrals are appropriately made.

# The force/constabulary in numbers



## Complaints

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

**204**

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

**37**

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

**2.5**

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

**2.6**



## Business interests

Applications in 12 months  
to March 2014

**53**

Approvals in 12 months  
to March 2014

**51**



## Resources

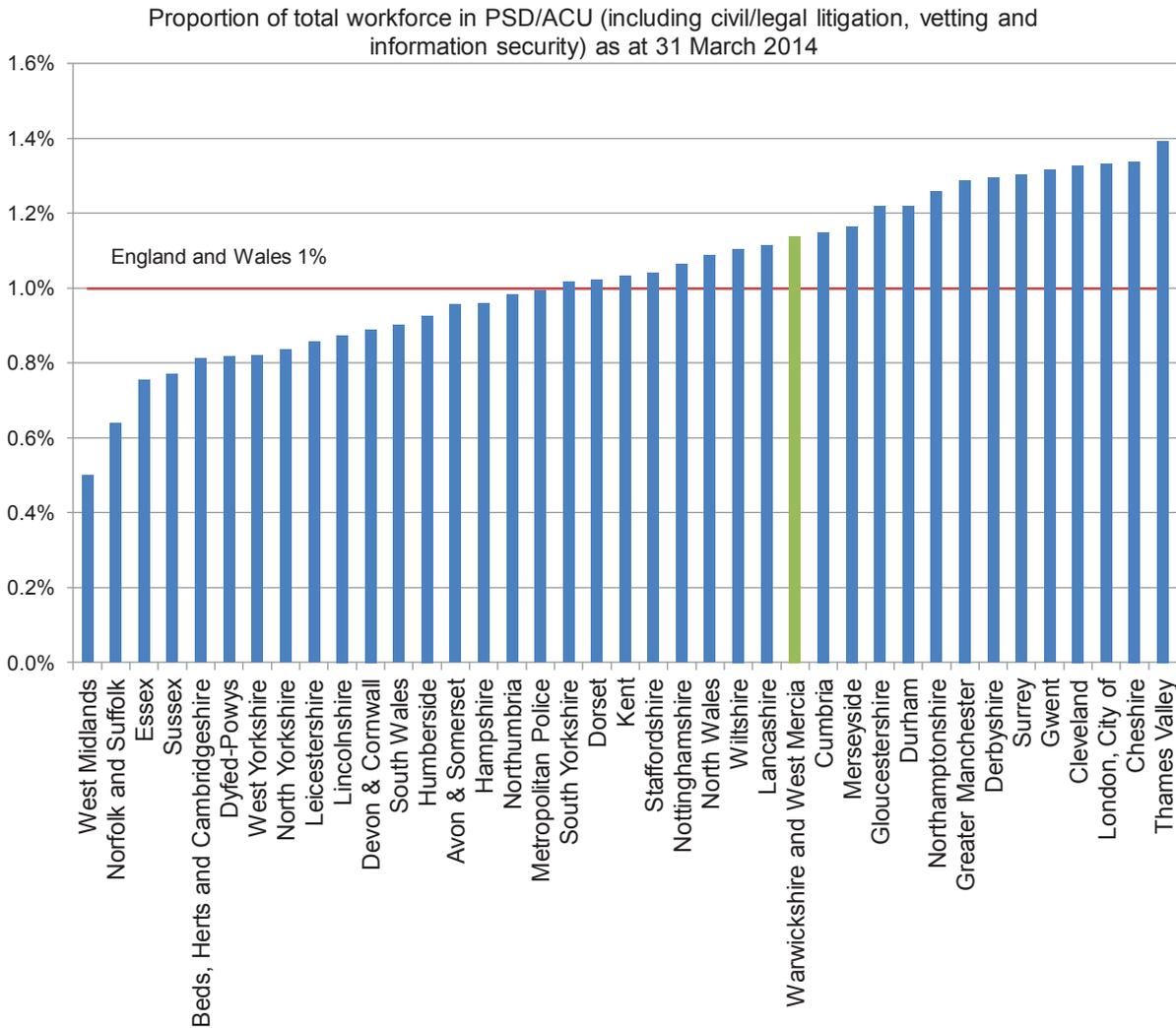
Proportion of workforce in  
PSD/ACU

**1.1%**

Proportion of workforce in  
PSD/ACU  
– England and Wales

**1.0%**

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



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

## Introduction

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

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

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

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

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

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

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

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

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

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

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In 2012 HMIC identified one area for improvement for the force; to improve monitoring between procurement and gifts and hospitality registers

In 2012 the force did not have any monitoring in place to cross-reference the contract and procurement registers with the gifts and hospitality register.

The force now has an online register for gifts and hospitality and a list of suppliers is made available on the force website. However, anti-corruption considerations are not explicit in force policy, and HMIC did not find any evidence of dip-sampling entries on the electronic gifts and hospitalities register against a list of contractors. Limited progress has been made with this area for improvement.

# What progress has the force made in communicating and embedding ethical and professional behaviour to all staff, including the new Code of Ethics?

## Leadership and governance

There is evidence of leadership from the chief constable to create a climate of ethical behaviour and willingness to challenge wrongdoing. Messages regarding integrity and the Code of Ethics have been delivered through the chief constable's blogs and the force intranet (Bear Connections), although there is no mechanism to ensure that staff have read and understood these messages.

Policies clearly explain the meaning of misconduct and unprofessional behaviour, however the policies do not describe what is expected of staff in their private lives. Police staff contracts clearly explain the meaning of misconduct and gross misconduct. Staff are aware of how their behaviour and conduct may affect both the public and their colleagues. Staff have the confidence to report misconduct and challenge inappropriate behaviour. This could be enhanced through the use of visual reminders such as posters and screen savers within police premises to reinforce ethical and professional conduct.

The force has clear plans, in alliance with West Mercia Police to communicate, and embed the new Code of Ethics through a three-phase approach and there is a detailed plan to support this. The three phases are: to raise awareness of cultural development; shape the future culture of the force; and ensure all staff are fully aware of the plans. There is good understanding of the code, personal responsibilities and the plan to embed the Code of Ethics across the force, although there has been little effective training on standards and ethics in the last two years.

Staff whom we interviewed are confident about challenging wrongdoing and believe they would be supported through the process. The force has a policy in place to provide welfare support to those reporting wrongdoing.

The force also has a policy outlining the obligation to declare any change in circumstances regarding personal associations and relationships. However, knowledge of this policy was limited with some staff adopting their own common-sense approach of what to report to the force. Some staff felt that associations were most likely to be reported when challenged by colleagues.

## 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.**

The National Decision Model (NDM) is understood and used at all levels in the force. Training has been provided on the NDM to all operational frontline officers as part of officer safety training, for staff in the force control room, and as a part of recruit training.

A limited amount of training on ethical and professional behaviour has been provided, including computer-based learning packages on subjects such as race relations. Staff feel that training on ethical and professional behaviour is not a current priority. The force does not carry out any checks to ensure that learning has been absorbed. The PSD provide contributions to training and promotion courses and at the new recruit stage.

The head of the PSD has the responsibility for the management of officers and staff in both West Mercia and Warwickshire within PSD working under the strategic alliance between both forces. The department head is a superintendent who reports to the head of human resources and has a number of other departmental and management responsibilities that are not PSD-related. This reduces the amount of senior management time dedicated to professional standards.

HMIC found that chief officers provided some information to the police and crime commissioner (PCC) but not a sufficient amount to enable effective oversight and governance of integrity issues.

Integrity issues (including misconduct and unprofessional behaviour) are monitored by chief officers at governance meetings. The head of the PSD is line managed by the head of human resources and there are regular meetings between the head of the PSD and the deputy chief constable.

## Understanding integrity

The force has not carried out any survey work, either internally or externally, to understand how integrity issues (including misconduct and unprofessional behaviour) affect public trust; the force does conduct surveys of victims of crime, although these do not include specific questions on integrity. There is an opportunity for the force to do more to establish the level of understanding among staff on how integrity affects public trust and whether the workforce has any training needs in this respect.

The force has a centrally held repository which is accessible by the ACU where officers and staff who are offered gifts or hospitality should record the details. However, HMIC found that this does not always occur and a number of staff did not understand the policy, with some staff of the view that it was acceptable to take gifts up to £20 in value. Further work is required to ensure that all staff fully understand their responsibilities in relation to the gifts and hospitality policy.

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Details of all occasions on which officers and staff have applied for authorisation for a business interest (including those occasions on which authorisation is withheld) are recorded fully in a centrally held repository, which is regularly audited. There is a good level of understanding among staff of the need to notify the force of secondary employment.

Rejected business interest applications are followed up to ensure compliance where additional information or intelligence justifies investigation.

There is currently no analysis carried out to identify trends in relation to integrity issues (including misconduct and unprofessional behaviour), although the force has recently appointed an analyst who will have responsibility to conduct this work in the future.

# 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, including the senior police national assessment centre and the fast-track development scheme.

The force does not audit how investigations are assessed, recorded, investigated and how sanctions are imposed to ensure that all staff, irrespective of rank or role, are treated fairly and equally.

Warwickshire Police has a confidential reporting hotline that is publicised on the intranet and staff demonstrated a good level of knowledge of how they could confidentially report wrongdoing.

HMIC conducted a review of a small number of PSD cases. This included reviewing up to ten randomly selected cases involving serious misconduct or criminal conduct. The aim was to check on timeliness, supervision and appropriateness of decision-making. The force responds to reports of wrongdoing by staff with the right level of investigation but not in a timely manner. There is a backlog of investigations resulting in some cases not being investigated for weeks or even months.

The force publishes data on its public website that covers chief officer expenses, redacted details on staff business interests and the gifts and hospitality register.

Cases appear to be appropriately referred to the IPCC. The force initiates governance meetings where necessary, to manage misconduct and criminal allegations and to ensure urgent action is taken, including notification to the IPCC.

The force circulates the IPCC bulletin to officers and staff to disseminate learning; however, it does not encourage or collate responses to it. There are a small number of examples where lessons had been learned from past experiences to prevent future issues, and the force should seek to develop this approach.

## Professional standards training and resourcing

Members of staff in the PSD and the ACU receive some training for their role including an initial two-week course. Accredited investigative training is provided to those officers who are not already trained to this standard.

Succession planning for replacing staff does not take place to ensure consistency in the PSD and the ACU, leading to unfilled vacancies and the force has used a retained officer scheme to fill gaps in the department. As part of the strategic alliance between West

Mercia and Warwickshire, police resources in the PSD are pooled, although the overall numbers have been reduced limiting the capacity within the PSD to provide a proactive and preventive capability. The division of responsibility between the PSD and the ACU is not clear, with the ACU taking on work that traditionally is not within their scope of responsibility. This directly affects the ACU's capacity to undertake more proactive investigations. Furthermore, some work is sent out to frontline supervisors to deal with, some of whom have not received training on how to deal effectively with complaints and misconduct matters.

## Quality assurance

The force does not conduct audits to ensure that investigations are justifiable and proportionate although HMIC found that the outcomes and sanctions that had been imposed were appropriate.

The force does not have a mechanism to ensure the timeliness and quality of all investigations conducted in relation to officers and staff. Staff in the PSD had a substantial workload and many reports were registered as overdue, on occasion without any meaningful rationale for the delay. Some complaints are allocated to local supervisors to investigate without timeframes within which to complete the work. However, the PSD provide some oversight of these investigations.

The force does not have a structured approach to ensure that lessons from misconduct cases are learned and recorded. Each investigation has a lessons learned section within it that should be completed by the investigating officer. Sometimes the lessons that are learned are built in to force training programmes to improve the service provided. Some lessons are disseminated on an ad hoc basis through the force intranet. A list of dismissals is also published together with brief case summaries.

There is a no policy on suspension, resignation and retirement during investigations, and on occasion suspended officers and staff had resigned during investigations.

## Recommendation

**Within six months, the force should publish a policy which clarifies the position on suspension, resignation and retirement of officers under disciplinary investigation.**

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

## Investigating corruption

The force does not manage the threat, risk, and harm from corruption as part of a clear governance structure. Corruption does not feature on the risk registers of the procurement department, or indeed the force. The force has not introduced a procurement policy, or a process to systematically cross-reference procurement purchases with the gifts and hospitality register.

## Recommendation

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

The force proactively, but not regularly, identifies vulnerable members or groups of staff through use of the national crime agency (NCA) counter-corruption threat assessment and the transparency international integrity cycle. The force does provide analytical work when reacting to information or as part of an ongoing investigation and some work has been done to identify those members of staff who are financially vulnerable and face possible debt problems. The recent appointment of a dedicated analyst should support increased proactive work in this area.

Vetting arrangements comply with the national vetting policy and identify corruption risks at the recruitment stage for officers and staff. Vetting is revisited on promotion to senior ranks or posting to sensitive or vulnerable roles.

The force does not monitor force systems and social networking sites. While there are policies in relation to using social media these are not widely understood by officers and staff. The force does little to monitor this in a proactive manner, and there is a lack of investment in terms of equipment, staff and training to achieve this. The force is still considering a business case to purchase software to monitor use of force systems.

## Recommendation

**Within six months, the force should ensure it has the capability to view and record information accessed by officers and staff on the force computer systems. The existence of this tactic should be communicated to all staff to assist in prevention of abuse of systems.**

The force does not use random and with cause substance testing or intelligence-led integrity testing to identify corruption and there is no ongoing programme to identify or deter such risks.

## Recommendation

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

The force ensures that organised crime investigations are not compromised by the threat of corruption and takes steps to mitigate risks to forthcoming operations. The ACU are involved in the planning phase of major crime operations and have access to the list of staff involved in those operations.

The force ensures the effective security of systems, exhibits and case papers and operates a clear desk policy. The PSD is a controlled environment; access to computer systems is password controlled and case papers are secured when they are not being worked on.

## Intelligence

Intelligence gathered or received is analysed, graded (in accordance with the authorised professional practice) and developed before being any action is taken on the basis of it. An intelligence development unit has recently been established but, due to capacity issues, its officers and staff spend part of their time working as investigators clearing public complaint and misconduct cases.

Actionable intelligence is not always acted upon promptly, although the force does have data on sickness absences among staff, the numbers of staff against whom county court judgments have been entered, and those who have sold off their pensions for less than they are worth.

There is a fortnightly tasking and co-ordinating mechanism where corruption issues are considered, recorded, allocated and reviewed.

The force effectively identifies those cases which involve multiple suspects and multiple offences by a single suspect and opportunities to link individuals and incidents were explored fully.

Given the newly formed intelligence development unit and the additional analytical and research staff, there is an opportunity for the force to improve the proactive gathering of intelligence and development of information for investigation. The force should take this opportunity.

## Capability

The PSD and the ACU are able to access specialist assets when required, if necessary with support from the region or through the NCA.

The ACU does not currently have the capability and capacity to be proactive in preventing, searching for, and investigating corrupt practice, which is compounded by staff from the ACU being used to support the PSD on overt public complaint and misconduct investigations. The force has acknowledged this and has introduced an intelligence development unit to improve the situation.

The performance of the PSD and the ACU, including the timeliness and quality with which they handle complaints, conduct investigations, reach decisions and manage appeals, is monitored by the force. The additional analytical resource should enable the PSD to further improve how it manages its performance in the future.

The head of corruption has a clear and direct reporting line to the chief officer lead.

The force takes action to disseminate lessons learned, but does not have a mechanism to determine whether the learning has been effective.

We examined a small number of cases and found that they were appropriately referred to the IPCC in accordance with the statutory guidance.

## Recommendations

- **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 publish a policy which clarifies the position on suspension, resignation and retirement of officers under disciplinary investigation.**
- **Within six months, the force should ensure it carries out regular audits of integrity-related registers including gifts and hospitality, business interests, notifiable associations, expense claims, procurement activity and other records to identify potentially corrupt activity.**
- **Within six months, the force should ensure it has the capability to view and record information accessed by officers and staff on the force computer systems. The existence of this tactic should be communicated to all staff to assist in prevention of abuse of systems.**
- **Within six months, the force should ensure it has a policy on substance misuse and drug testing to identify and deter substance misuse. The force should communicate this to all staff.**