



Inspecting policing
in the public interest

Police Integrity and Corruption

West Midlands Police

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

The leadership of the chief officer team is clear and there is a convincing plan supporting the introduction of the Code of Ethics. Governance processes are good and staff understand professional boundaries. The force appropriately identifies threats and risks posed by unprofessional behaviour, misconduct and corruption and responds robustly. Further work is needed to improve initial assessments of misconduct, ensure misconduct processes are fair and learning points are identified. The capacity and capability of the professional standards department is limited. A number of policies need to be reviewed and improved.

Summary

The chief officer team consistently and effectively reinforce integrity issues and their clear lead is recognised across the force. Work to support the promotion of integrity is being driven by chief officers and the plan to implement the Code of Ethics is well developed. HMIC found that staff are prepared to challenge unprofessional behaviour and reporting mechanisms are in place; however some staff expressed a lack of confidence in these processes.

Better processes need to be put in place to ensure the fair and consistent investigation and determination of misconduct, and the assessment of its severity. The proportionality of decisions relating to suspension, resignation and retirement, while officers are under investigation, needs further consideration. The timeliness of the investigation of professional standards needs to be improved. The capacity and capability of the professional standards department is limited.

Some policies that promote integrity need review and revision, including the business interests policy and the gifts and hospitality policy.

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 two areas for improvement identified in 2012.

There is a good process in place for cross-checking the gifts and hospitality register against procurement registers. However, staff have only a limited understanding of the policy around gifts and hospitality.

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 constable and other members of the chief officer team to support a climate of ethical behaviour.

There is a clear plan to implement the Code of Ethics.

The need for ethical and professional behaviour has been incorporated into policies and procedures.

Extensive training is given to supervisors to promote integrity but some first and second line supervisors still lack the confidence to challenge unprofessional behaviour.

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

Confidential mechanisms for staff to report concerns are in place.

Most members of staff appeared able and confident to report misconduct and unprofessional behaviour.

Information on gifts and hospitality received by the force needs to be made more accessible to the public.

The dissemination within the force of lessons learned needs to be improved.

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

Force and local threat assessments are produced and acted on.

Clear processes are in place for prioritising and allocating the steps to be taken to tackle corruption. Vulnerable staff have been identified and supported.

The force does not carry out an audit of senior officer/chief officer/senior staff diaries against the gifts and hospitality register and expense claims.

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

Progress in ensuring that the policy on secondary employment and business interests is sound and well understood was limited, and many staff still do not understand the policy. More robust checks are needed to ensure compliance.

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?

Staff have only a limited understanding of the policy around gifts and hospitality.

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

The professional standards department is not sufficiently resourced.

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

The force has systems in place to ensure organised crime investigations are not compromised by corruption.

The force/constabulary in numbers



Complaints

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

1439

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

13.1

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

260

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

261

Approvals in 12 months
to March 2014

257



Resources

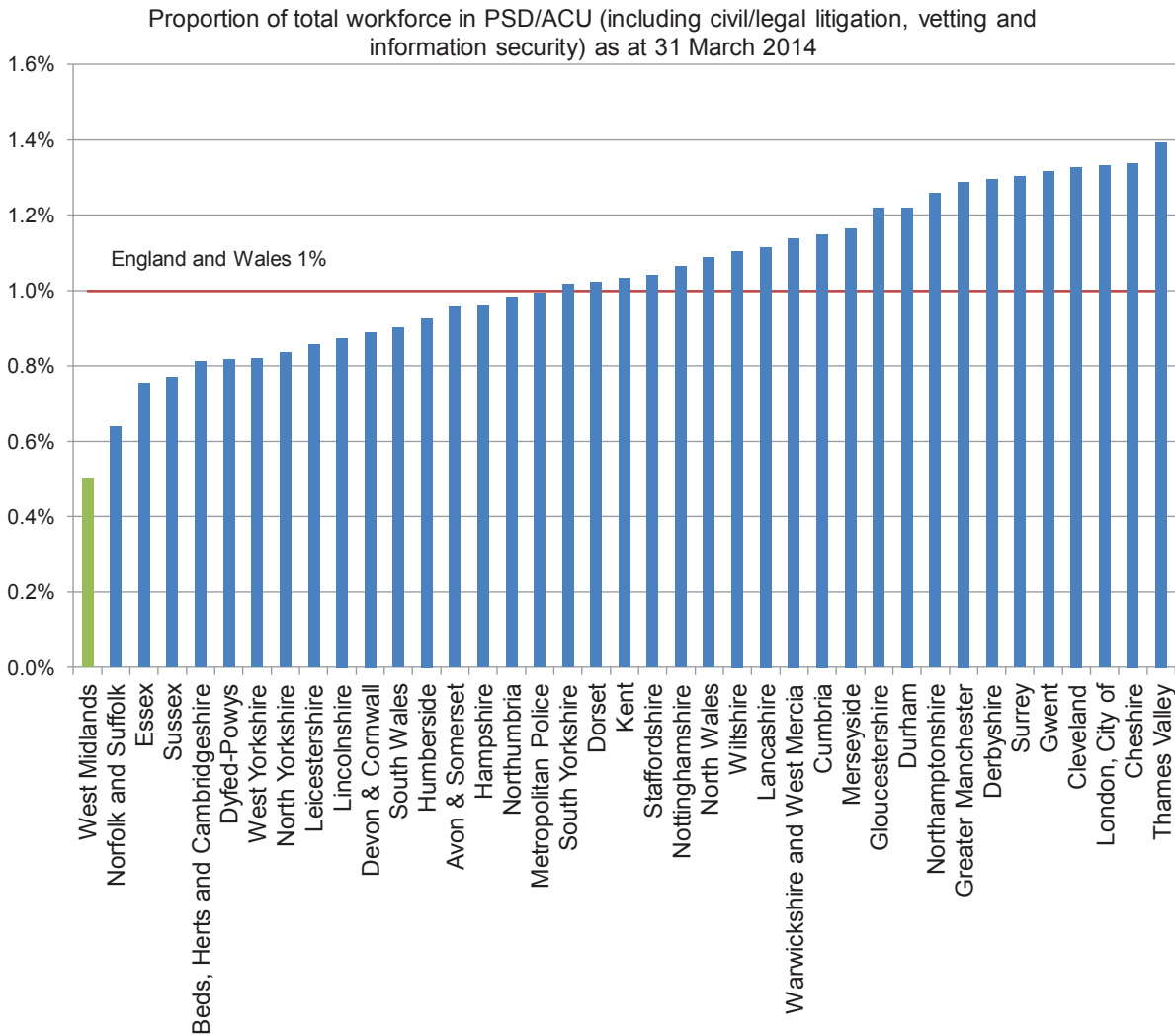
Proportion of workforce in
PSD/ACU

0.5%

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 West Midlands Police in 2012 HMIC found that two areas required improvement:

- (1) The contract and procurement registers needed to be monitored and cross-referenced with the gifts and hospitality register.

The force has made good progress. A monthly check of the gifts and hospitality register is conducted by the professional standards department (PSD) and cross checked with the procurement register.

- (2) A revised and more robust policy on second jobs and business interests needed to be produced, implemented and clearly communicated to all staff.

In relation to the secondary employment and business interest policy, HMIC found a lack of understanding of what was and was not a business interest. While there is a review process and local policing unit (LPU) commanders are made aware of their staff who have recorded a business interest, local supervisors are not involved in any review process. These supervisors should also review cases where the staff affected change roles or where their personal circumstances alter.

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 clear leadership from the chief constable and other members of the chief officer team towards the creation of a climate of ethical behaviour. This started with the 'Pride in our Police' force initiative which provided a solid foundation for implementation of the national 'Code of Ethics'. There are annual road shows led by the chief constable, as well as senior leadership days. The chief constable hosts an annual awards ceremony promoting high quality work. The visits conducted by chief officers to local policing units and departments across the force reinforce ethical conduct. Chief officers also make use of messages on the internal website, posters and in briefings to staff to reaffirm the importance of ethical conduct.

The force has clear plans to introduce the new Code of Ethics. A plan has been put in place and is led by the deputy chief constable, through 'Pride in our Police'. The plan has clear objectives and its implementation is being managed by a chief superintendent. Every member of staff has received a copy of the Code of Ethics and training is being given to supervisors.

Considerable work has been undertaken with supervisors to improve their performance, give them confidence and support them. We found evidence that leaders including first line supervisors, led by example and demonstrated their personal commitment to ethical behaviour. However, some do not actively promote and encourage ethical behaviour or check their staff understand what is expected of them in their professional and private lives. HMIC staff were told that some first and second line supervisors still lack confidence and require more support in promoting ethical and professional behaviour.

At the time of the HMIC inspection there was an election campaign underway for the post of police and crime commissioner. Therefore it was not possible for the inspection team to establish whether chief officers provide sufficient information to the police and crime commissioner to enable effective governance and accountability on integrity issues, including misconduct and unprofessional behaviour.

Integrity issues are actively monitored by chief officers at governance meetings in a way that allows them to fully understand the issues, and identify the need for action. The assistant chief constable lead for integrity chairs the integrity board, whose members are drawn from disciplines across the force and include staff representatives. All integrity-related matters considered by the force have been consolidated into one plan being governed through the integrity board. The plan contains specific objectives to encourage a culture of challenge and reporting of wrongdoing.

The force has recently established a reputation and risk management team (RRMT) as part of the PSD, to help the force deliver against the national police integrity model. This team provides quarterly updates to the integrity board as well as updates to the 'Pride in our Police' board. Issues monitored include the number and nature of corruption referrals, and the number, nature and outcome of corruption investigations. This team is flexible enough to respond to emerging trends.

The performance of the PSD and the counter-corruption unit (CCU) is regularly monitored by the force and includes the timeliness and quality of handling complaints, investigations, decision-making, outcomes and appeals. Actions are tracked and staff held to account. The work of the CCU is monitored through a monthly meeting that prioritises and allocates actions, as well as by the quarterly integrity board.

Understanding integrity

We found evidence that officers and police staff are aware of the boundaries between professional and unprofessional behaviour and understand how it affects both the public and their colleagues. The 'Pride in our Police' campaign sets clear guidelines, particularly around standards of dress as well as use of social media.

Unethical and unprofessional behaviour is generally appropriately challenged, although some staff were confused about how to report such behaviour. However, our interviews suggested that staff feel that they can challenge and report matters to their line manager. Some felt there has been a marked improvement in the culture of the force to support challenge.

A dashboard of indicators measuring the health of the force has been introduced and any indications of bullying and harassment, including suggestions that the staff who report their concerns are adversely treated, are dealt with. However, in some cases, rather than deal with an issue immediately, some supervisors resort too rapidly to formal misconduct or performance processes. This may be an indicator of a lack of confidence in setting standards.

Policies and guidance clearly explain the meaning of misconduct and unprofessional behaviour and describe the acceptable boundaries, and what is expected of staff in their private and professional life. These are reviewed annually. However, not all staff read or understand the policies, some reporting they found it too complex. This can be compounded in areas where staff do not receive face-to-face training.

Limited work is carried out to understand how integrity issues, including misconduct and unprofessional behaviour, can affect public trust. This is done through surveys of officers and staff.

Surveys are also carried out to gauge the opinions of the general public, including youth groups. However, the emphasis of these surveys is around public confidence, with limited relevance to integrity issues and how this affects public trust. A staff survey was last conducted over a year before the inspection. A review was recently undertaken following up on this survey, leading to remedial work to address cultural issues at one police station.

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

Misconduct and unprofessional behaviour

There is a policy outlining the obligation to declare any change in circumstances in an officer's or staff member's personal associations and relationships. There is a change in circumstances process to support this. The policy focuses on protecting the integrity of individuals and should be clearer about its reporting requirements.

Not all officers and staff members were aware of their obligations under this policy. While the policy was reviewed 12 months ago, and made more explicit, there is an acceptance that understanding across the force was limited. Notifications are reviewed by the counter-corruption unit (CCU) that maintains records, checks and assesses the evidence. Briefing on notifiable associations is not delivered to all staff, although newly promoted supervisors have received communications about this issue and guidance has been delivered as part of the 'Pride in our Police' programme of work.

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.

Details of some occasions where officers and staff are offered gifts or hospitality are recorded fully, but checks by HMIC suggested that this was not comprehensive, particularly where the gift or hospitality was not accepted. The records are held centrally but are not regularly audited and inappropriate entries are generally not challenged or investigated. HMIC inspectors found evidence that the force does not carry out an audit of senior officer, senior staff or chief officer diaries against the gifts and hospitality register and expense claims.

HMIC found evidence that there is an inconsistent approach. In one example, a bottle of whisky and a bottle of red wine had been accepted and given to a charitable raffle, there was no personal gain for the recipient, while on another occasion a bottle of champagne had been refused. In another example, four watches (worth £120 each, given to two officers as a result of a visit to another country) were felt to be acceptable as a gift by a senior officer. This decision to accept was only questioned when the entry was seen by the head of the CCU.

Recommendation

Within six months, the force should ensure that it has a policy which informs staff of the gifts and hospitality that are appropriate to accept and why. The policy should include the requirement to register the value and description of all gifts and hospitality offered; including those declined. This should be communicated to all staff.

This inconsistent approach may raise issues of concern with the public, as well as among West Midlands Police officers and staff, particularly as most members of staff were very clear they would not accept any gifts. The force should develop its analysis and identify patterns of potential corruption, as currently it is unclear whether the force is doing this.

However, this inspection did not provide a comprehensive audit of the application of all of the policies that the force has in place.

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.

Details of all occasions where officers and staff have applied for authorisation for a business interest are recorded centrally, including where the application was not authorised. In the past, there has been no system to audit these applications at regular intervals, although this has recently been resolved. Plans are now in place to undertake this process annually.

Details of business interests are not published by the force. Responsibility for monitoring was, appropriately, moved from the human resources (HR) to the PSD and now to the RRMT, and there is a good working relationship between these teams.

Approval is provided by the head of the PSD although a local policing unit commander can make a recommendation. In the case of an appeal against a decision the final arbiter is a chief officer.

Intelligence checks are made within the PSD for any business interest application that is submitted. In the 12 months to March 2014 the approval rate for applications submitted was 98 percent with 261 applications being submitted and only 4 refused. Enquiries are made with Her Majesty's Revenue and Customs (HMRC) when an application has been made and HMIC heard evidence that some staff withdraw their applications when made aware of this.

Some staff were conscious of the need to declare voluntary work where this might impact on their roles as members of the force. Anecdotal accounts were given that some staff preferred to decline voluntary roles rather than submit the application. Community work can provide a valuable opportunity for staff to develop themselves as well as their communities and the force. The force has recently publicised the policy and guidance but it may wish to consider developing a specific policy to address the issue of voluntary work to provide greater clarity.

Although local police unit (LPU) managers do receive details of officers and staff who hold a business interest, HMIC found no evidence of a structured, systematic approach to monitor rejected business interests. There would be merit in the force more formally considering incorporating first and second line supervisors into this area and other related areas of integrity monitoring.

Misconduct and unprofessional behaviour are considered in relation to promotion decisions and in applications for courses, such as the strategic command course and the high potential development scheme. All application forms include a self-declaration, although the CCU do not systematically check promotion lists and it is not clear what checking processes are in place for moves between posts, including some specialist roles. However, there was evidence of staff being screened out of promotion processes and being prevented from attending specialist training as a result of pending misconduct issues. Work is currently ongoing with the human resources department to ensure management vetting is conducted prior to officers or police staff being moved between roles.

The force does not review how investigations are assessed, recorded, or investigated, nor how sanctions are imposed, to ensure all staff, irrespective of rank or role are treated fairly and equally.

Recommendation

Within six months, the force should ensure it has formal arrangements for the oversight of integrity and corruption-related issues, with clear lines of reporting and accountability.

The force is aware that black and minority ethnic officers appear to be disproportionately subject to misconduct investigations. Academic research has been commissioned in an effort to understand and respond to the issue. HMIC were told of staff concerns that some supervisors appear to have negative attitudes to staff who work part time.

The force recognises that there should be one unified process for dealing with both police staff and police officer misconduct, and proposals have been made for the PSD to deal with all allegations of misconduct.

We found evidence that staff generally feel confident in reporting misconduct and unprofessional behaviour by individuals or groups but do not perceive that they receive support in doing so. Reports of misconduct have increased over recent years and more people are reporting matters direct to the PSD. However, the staff survey, from July 2013, suggested only 50 percent of staff who responded felt confident that if they challenged inappropriate behaviour they would receive support, and only 33 percent of those felt confident that if they raised concerns in respect of their management they would be treated fairly. This supports evidence gathered in this inspection, where some staff reported they felt they would not be listened to, and that making a complaint might affect promotion prospects.

Recommendation

Within six months, the force should ensure all staff understand the support mechanisms available to those individuals reporting misconduct.

There are confidential mechanisms for staff to report wrongdoing, including an email link to the PSD and a confidential telephone system, although this is not heavily publicised when it could be used to increase staff awareness. Neither confidential system is underpinned by clear policy. Some staff told HMIC they had no confidence in the anonymity of the systems in place. Around five to six reports are made each day using the existing mechanisms. These are assessed by staff within the CCU, but with limited resources there are backlogs in dealing with the reports made.

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 does publish data or information in relation to the expenses of chief officers, senior officers, and police staff equivalent but this information is not published in a readily accessible format for the public to view. Reports of gifts and hospitality offered to staff are also available on the force website, however this too is not readily accessible. While the force does report the outcome of some misconduct hearings, personal information is redacted and only a summary of the result is published internally.

Misconduct hearings are held to ensure transparency, effectiveness, efficiency and legitimacy, including the use of an appropriately qualified presiding officer, who is independent of the person being investigated. Senior managers within the PSD present most gross misconduct cases, with lawyers used to present the most complex. Independent chairs of panels do not have legal advisors present but they have been trained for their role.

The force makes use of fast-track dismissal where appropriate, particularly when an officer is sentenced for a criminal offence.

The force does identify lessons learned from misconduct investigations but not in a structured way and they are not consistently disseminated to officers and police staff. The force does, however, use some lessons learned from misconduct investigations as case studies in the PSD training inputs, and the publishes them on the force intranet.

Professional standards resourcing and training

The National Decision Model (NDM) is used at all levels in the force and officers and staff are trained in its use and understand its application. This takes place through officer safety training as well as investigative, public order, firearms training and through the promotion process. All staff involved told HMIC they were aware of the model and how to use it, including its emphasis on values and ethics. This may be as a result of the attention the force paid to 'values based' decision making prior to the national adoption of the NDM. The NDM is regularly reinforced by managers. In addition the force is engaged with other emergency services where the NDM, in the form of the joint decision-making model, is used as the framework for cross-services decision making.

Training on ethical and professional behaviour is delivered regularly to all staff and knowledge is checked. The force recognises the critical role of first and second line supervisors and there is a structured quarterly programme of development for all supervisors. Records are kept of attendees enabling follow up in cases of non-attendance. Integrity issues, including unconscious bias and recognising dilemmas, are incorporated into officer safety training and stop and search training. The opportunities provided to discuss issues and check understanding were appreciated by staff.

While e-learning courses are not generally appreciated by staff, HMIC found this is used to deliver part of a blended learning approach at training days, led by supervisors, and this provides a further opportunity to discuss integrity and professional standards issues. The force is also looking to make more structured use of training days; this will enable professional standards training to be delivered to an even wider range of staff. The force need to ensure such training is also delivered to police staff.

Some analysis is carried out to identify trends in relation to integrity issues, including misconduct and unprofessional behaviour and any issues identified are addressed effectively. The force integrity board seeks to identify trends.

The annual audit schedule includes four key areas of risk each year, agreed by the deputy chief constable, this includes potential misuse use of the police national database (PND) and police national computer (PNC). If a worrying trend is identified then action is taken to understand the risk to the force and address it.

Cases are appropriately referred to the Independent Police Complaints Commission (IPCC). The PSD has permanent on-call cover to ensure a swift referral and new referrals are discussed and confirmed at the daily management meeting. 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. Of the files reviewed, one case involved an inappropriate referral to the IPCC.

The force actively uses the IPCC bulletin to disseminate learning but does not encourage or collate responses. The force acknowledges that it is not good at capturing, sharing and disseminating learning and this includes the IPCC bulletin. The PSD publish the bulletins on their internal intranet site and meet bi-monthly with the assistant chief constable lead, as well as quarterly with the IPCC, where lessons learned are discussed.

HMIC found little evidence of wider learning being captured. HMIC would encourage the force to develop and implement a process for formally disseminating learning from the IPCC bulletin and other sources, collating responses and monitoring where this requires a change in policy or procedure.

Recommendation

Within six months, the force should ensure it has an effective process to communicate to all staff, both locally and nationally identified lessons to be learnt on integrity and corruption.

While staff in the PSD and anti-corruption unit (ACU) receive some training for their role, this is not on a regular basis. Training is dependent on the skills set of each individual person, although each team will have sufficient access to a range of systems both local and national, including the police national database (PND) and the police national computer (PNC). Senior staff have attended the College of Policing anti-corruption course, up to and including silver level (this is the tactical level, usually inspector or superintendent ranks) and there are plans for detective sergeants to attend the bronze (operational level) course. While the PSD undertake their own training needs analysis, the force learning and development department are not sighted on what this entails, or what the training may cost and whether it is good value.

The PSD is not sufficiently resourced or qualified to offer a proactive and preventative capability. Previously the counter-corruption unit (CCU) did not pursue suspects unless a crime was revealed, although this has now changed, with misconduct (short of criminality) now being included in the prioritisation of work. Contrary to established good practise there is no effective 'sterile corridor' between the PSD and the CCU.

Until 31 March 2014 there were a number of vacancies within the PSD, with surveillance trained officers within the PSD abstracted to supplement the CCU when required, thereby potentially impacting on the ability to conduct timely and effective reactive investigations. The force should review resourcing levels and workflow within the PSD to ensure it is staffed appropriately.

Quality Assurance

The force does not routinely and systematically audit decisions, made in hearings and meetings, dealing with allegations of misconduct or unprofessional behaviour against officers and staff, to ensure the consistency and fairness in these decisions. However with regards to police staff misconduct the results of 31 hearings were audited in 2013 to ensure the decisions were consistent. Misconduct meetings take place in local policing areas, chaired by a superintendent or above. Where appropriate, officers receive annual training and support from staff with expertise in dealing with misconduct matters. Learning from police appeal tribunal cases was also not being analysed to identify lessons that could be learned.

Some checks take place to ensure investigations are justifiable; dealt with at the right level; and escalated or de-escalated appropriately, but this is not done regularly. HMIC found one instance where a chief inspector's initial severity assessment showed misconduct had been committed, which on submission to the PSD was upgraded to gross misconduct by an inspector – yet no rationale was recorded to justify this change. In most cases examined, the initial severity assessment was conducted by either a sergeant or inspector, with no rationale recorded on the file.

Although there is no policy on suspension, resignation and retirement during investigations, the decision to suspend during investigation is made on a case-by-case basis by the appropriate officer within PSD. This decision is then ratified by chief officers. Monthly reviews of suspensions are conducted by the assistant chief constable.

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?

Corruption Investigation

The force effectively identifies and manages the threat, risk, and harm from corruption. The PSD produce a force threat assessment and local threat assessments, and they analyse staff sickness and civil claims to identify potential corruption risks.

The force uses intelligence-led drug testing to identify corruption. Results are not circulated to the workforce. There is currently no financial provision for the force to undertake random drug testing, as the force found this to be ineffective.

The force ensures that organised crime investigations are not compromised. The PSD attend the force tasking and co-ordination group, although there was little evidence of work being allocated to the PSD at these meetings.

There are good working arrangements between the staff in the CCU and the National Crime Agency (NCA), the regional organised crime unit (ROCU) and force CID, as well as with the force confidential unit and operation security manager.

The force ensures the effective security of systems, exhibits and case papers. Checks undertaken by HMIC found that station parade rooms were free of possible exhibits and there were positive indications of good practice.

Intelligence

The force gathers intelligence on corruption and grades it, following national Authorised Professional Practice (APP). While the force complies with this guidance, its capacity to do so regularly is limited by the resources available within the CCU.

There is a tasking and co-ordination mechanism in place, at which corruption issues are considered, recorded, and tasks allocated. There is a monthly tasking process as well as a daily management meeting to prioritise and manage the workload. Risks identified are managed by the RRMT. Intelligence gathered or received is analysed, graded and appropriately developed before being allocated for action.

The force effectively identifies multiple suspects and multiple offences by a single suspect. Evidence showed the force pursues all those suspected of corruption. The force proactively, but not regularly, identifies vulnerable individual staff and groups, and in doing so, draws on information and guidance in the NCA counter-corruption threat assessment and Transparency International's 'Integrity Cycle'.

The force has a debt management group with website advice, and debt counsellors. The force has identified, from work conducted with the Police Mutual Assurance Society, that the number of officers at risk of unmanageable debt is slightly higher than the national average.

Work has been undertaken to identify officers who may have attachments to earnings. Training has been given to first and second line supervisors to help identify staff vulnerable to corruption and this has included staff with financial problems.

Vetting arrangements comply with the national vetting policy and identify corruption risks at the recruitment stage for officers and staff, and are revisited on promotion to senior ranks or posting to sensitive or vulnerable roles. This is supported by a policy to ensure all staff are aware of the required vetting procedures and its various levels. All contractors who will be working with the force through its partner arrangement with Accenture have also been vetted.

The force monitors its own IT systems and social networking sites and takes action when appropriate. Staff within the CCU are consulted on the introduction of any new technology to assess its risk to corruption. The force has a systems monitoring policy and policy for appropriate use of social networks. Staff are aware that some monitoring takes place and of the potential consequences of misuse of social networks or force systems. However, there was no evidence of proactive monitoring of systems or social media and it appears that monitoring only takes place following the identification of evidence to raise suspicion.

Capability

The PSD and the CCU have ready access to specialist assets when required. There are specialists within the PSD and the CCU around surveillance, a dedicated source unit and technical support, as well as family liaison and major incident management units. In addition there are other specialist units available within force, although the National Crime Agency (NCA) is more usually called upon, in order to heighten the security of covert anti-corruption investigations. The head of the counter-corruption unit has a clear and direct reporting line to the chief officer lead.

The CCU has a dedicated analyst and research capability which is highly effective and well qualified. However, the resource level did not appear to match the level of demand placed on them, so the force may be exposed to risk that it is not sighted upon.

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, force should ensure that it has a policy which informs staff of the gifts and hospitality that are appropriate to accept and why. The policy should include the requirement to register the value and description of all gifts and hospitality offered; including those declined. This should be communicated to all staff.**
- **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 formal arrangements for the oversight of integrity and corruption-related issues, with clear lines of reporting and accountability.**
- **Within six months, the force should ensure all staff understand the support mechanisms available to those individuals reporting misconduct.**
- **Within six months, the force should ensure that it has the proactive capability to effectively gather, respond and act on information which identifies patterns of unprofessional behaviour and corruption.**
- **Within six months, the force should 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 has an effective process to communicate to all staff, both locally and nationally identified lessons to be learnt on integrity and corruption.**