



Inspecting policing
in the **public interest**

Police Integrity and Corruption

Devon and Cornwall Police

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Contents

To what extent has the force put in place arrangements to ensure its workforce acts with integrity?	4
The force in numbers	7
Introduction	10
What progress has the force made on managing professional and personal relationships with integrity and transparency since HMIC's December 2012 report?	11
What progress has the force made in communicating and embedding ethical and professional behaviour to all staff, including the new Code of Ethics?	14
How well does the force proactively look for, and effectively challenge and investigate misconduct and unprofessional behaviour?	17
How well does the force prevent, identify and investigate corruption?	24
Recommendations	26

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

The force has worked well to instil ethical and professional behaviour. Chief officer leadership is effective, although some staff perceive a need for more contact and communication with the chief officer team. Offers of gifts and hospitality are recorded comprehensively but not yet cross-checked with chief officers' and senior managers' diaries. The force manages threat, risk and harm from corruption but tends to be reactive; more could be done to prevent problems developing. Vetting procedures are a strength.

Summary

Good progress is being made in promoting ethical and professional behaviour. Staff are aware of the standards required. This is fostered by the chief constable's clear ethical stance. Some staff would also welcome more leadership and visibility on integrity issues from chief officers, but they recognise that good leadership also comes from other senior officers and supervisors.

The monitoring of integrity issues is not extensive at force-level meetings. Chief officers do not routinely review integrity-based matters.

Systematic reviews of investigations and misconduct cases (to ensure that all staff are treated fairly and equally) are not conducted.

The force's ability to investigate misconduct is good. However, it should ensure that it has a clearer grasp of areas of risk that are known about, and that it takes more action to identify and tackle emerging misconduct threats.

The force has identified a set of emerging corruption risks. However, these need to be explored further and addressed more actively. The force does not have a clear understanding of which officers are most susceptible to corruption.

Vetting procedures are a strength.

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

A number of key policies have been updated and communicated to staff. However, the level of staff awareness is inconsistent across the force. Some staff find these policies difficult to access on the force intranet.

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 is making good progress instilling professional behaviour, and chief officer leadership is clear and positive. However, some staff would like more contact with chief officers and senior leaders. Staff are aware of what constitutes professional behaviour and understand how it affects the public and their colleagues. Albeit, regular integrity training is not provided to all staff.

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

There are confidential and overt mechanisms for staff to report wrongdoing.

Staff are confident about reporting misconduct and unprofessional behaviour, and generally feel they would receive support if they were to do this.

The professional standards department (PSD) has sufficient resources and qualified staff to ensure that it is able to carry out reactive activity. However, there is no evidence of proactive work.

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

The force manages threat, risk and harm from corruption. However, it does not conduct a full assessment of these risks and mitigating action taken to reduce the likelihood of their occurring.

The force regularly gathers intelligence on corruption. However, the unit responsible for this is predominantly reactive. It has insufficient capability and capacity to move beyond a reactive response to intelligence, and it needs to develop in order to actively identify and act on new and emerging risks and threats.

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

Procurement is undertaken effectively through the south-west police procurement department. However, there is no evidence that the force cross-checks gifts and hospitality; procurement; expenses; and chief officers' diaries to identify potential patterns that may cause concern.

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?

Chief officers have an overview of integrity issues through informal structures. However, the force lacks a sufficiently detailed understanding of the state of its ethical, integrity and professional standards issues.

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

Succession planning takes place in the PSD and the ACIU (anti-corruption intelligence unit) at the practitioner level but not at supervisor or management level.

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

1233

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

24.8

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

15.7



Conduct

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

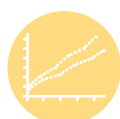
118

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

119

Approvals in 12 months
to March 2014

119



Resources

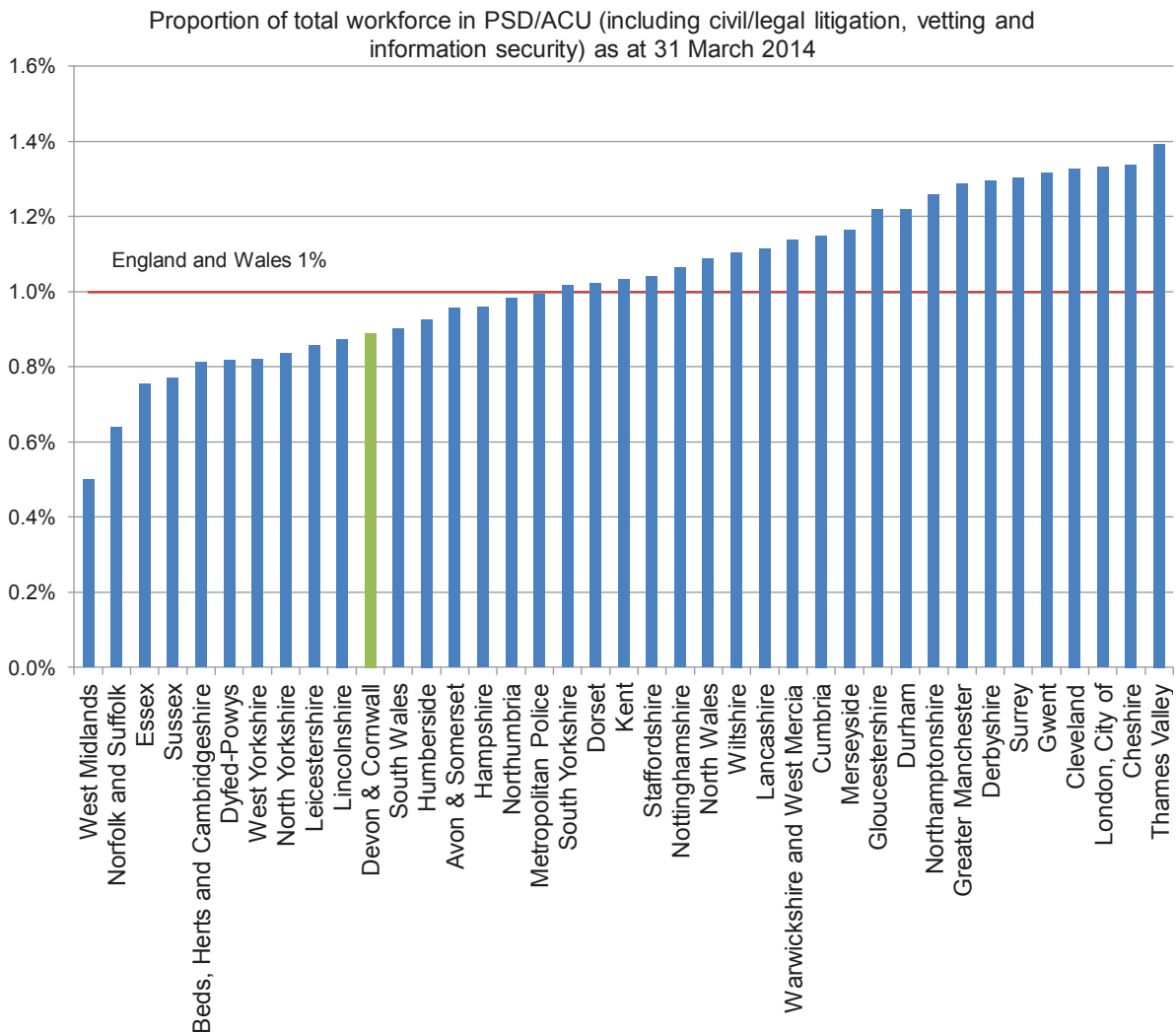
Proportion of workforce in
PSD/ACU

0.9%

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 service³. 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.justiceinspectorates.gov.uk/hmic/ in early 2015.

1 *Without fear or favour: A Review of Police Relationships*, HMIC, London, December 2011. Available from www.justiceinspectorates.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.justiceinspectorates.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?

HMIC highlighted four areas for improvement in the 2012 inspection report:

- Key policies (including media, use of social media, acceptance of gifts and hospitality, and officers having second jobs or other business interests) had been updated, but more needed to be done to inform staff about these policies.
- Social media monitoring was not comprehensive and needed to be enhanced.
- A single gifts and hospitality register should be introduced.
- A system needed to be implemented to cross-reference contracts and procurements with the gifts and hospitality register, to ensure the integrity of the procurement process.

This inspection did not provide a comprehensive audit of the application of all the policies that the force has in place. However, it is clear that the force has looked at its policies (including those covering relationships with the media, acceptance of gifts and hospitality, social media use and police officers having second jobs) and conducted an integrity assessment, using the self-assessment checklist provided in HMIC's 2011 report, *Without Fear or Favour*. Policies have been updated or are in the process of being reviewed. Staff have been informed about this process and, although there is a general understanding of the ethical thread running through the policies, some staff reported that they are too lengthy and varied. It was suggested that some policies would benefit from simplification or the provision of some guidance notes.

Furthermore, although the policies can be looked at through the force intranet, some staff stated that they cannot access them easily. More needs to be done to understand and address these concerns.

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 force has recognised that activity on social media is an increasing risk to staff and the force's reputation, and has taken steps to reinforce its stance on the importance of appropriate social media use. The force has reviewed its policy and guidance on how officers and police staff should behave on social networking sites when using force computer systems. At the time of the inspection, this policy was being updated to include the behaviour expected of staff when they are off duty.

The force's corporate communications department uses software such as 'tweet deck' and 'crowd control' to monitor and manage the use of force social media systems, and it highlights concerns and any inappropriate behaviour to the professional standards department (PSD). When such issues are identified, the force actively monitors those social media accounts that give cause for concern and initiates misconduct or criminal investigations if appropriate.

The corporate communications department has also identified social media champions within the different policing areas to provide advice, supplementing this with force policy updates and guidance on the intranet. However, the force acknowledges that its monitoring is not comprehensive.

We recognise that the force is working to address these gaps – in particular, by developing guidance for off-duty use of social media and in considering extending its current monitoring processes – but at the time of the inspection more still needed to be done.

In 2011, HMIC found that the force was keeping a record of the gifts and hospitality received by officers and staff, but this information was being recorded on a number of different registers held by different departments. This made it more difficult to monitor and identify any problems. At that time, the force was in the process of introducing a single electronic register, overseen by the head of the PSD.

The force has now created a single gifts and hospitality register, which sits within the anti-corruption intelligence unit (ACIU) above. These records are regularly audited by the ACIU and inappropriate entries are challenged or investigated. Knowledge on this subject is widespread throughout the force, including in respect of recording and reporting responsibilities.

In addition, the force website contains the register of gifts and hospitality, covering all levels in the organisation and details of accepted and declined events and items.

A good procurement process is in place, which is undertaken through the south-west police procurement department, a collaborative arrangement between forces in the region.

However, there is no independent monitoring to cross-reference contracts and procurement with the gifts and hospitality register and chief officers' diaries to ensure the integrity of the procurement process (for example, to look out for instances where a company provides hospitality and is then awarded a contract).

Recommendation

Within six months, the force should ensure that 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.

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

The force is making good progress in promoting ethical and professional behaviour. This is fostered by the chief constable's unequivocal ethical stance. The chief constable's expectations are understood throughout the force.

The chief constable uses the force senior leaders' forum to communicate key messages on integrity. This reinforces the expectation that senior leaders should be, and are, responsible for passing on messages about integrity to their own departments, and modelling such behaviour. The chief constable and other chief officers also carry out unannounced visits to police stations, known as 'chief officer group on the road'. There is a regular chief officer question and answer session, using the force intranet, which is supplemented with messages posted on the intranet.

The chief constable's ethical stance is undisputed by staff spoken to during the inspection. However, a range of staff told HMIC that they would benefit if the chief constable were more visible and accessible to lower ranks.

Staff told us that leadership and communication on integrity issues (including misconduct and unprofessional behaviour) by all chief officers are improving, but some felt that even more clarity, contact and visibility are needed. Some staff look predominantly to local senior officers and their first- and second-line supervisors for their direction on integrity issues. It is positive that local leaders and supervisors are well regarded, and often visible and accessible, but more should be done to improve chief officers' influence in setting standards in all parts of the force.

The force is clear that, in order to sustain an ethical and professional culture, force standards must be reinforced by supervisors.

Officers and police staff are aware of the boundaries between unprofessional and professional behaviour and understand how their behaviour affects both public confidence in the police and the impact on their colleagues. In general, there is an understanding at all levels that staff should consistently act appropriately and professionally, and also challenge colleagues when necessary. HMIC spoke with staff who said they feel confident to challenge unprofessional behaviour and gave examples of when they have challenged conduct.

The force is trying to instil ethical behaviour through its programmes for new staff. However, training on ethical and professional behaviour to existing staff is irregular and not given to all staff. There is no follow-up process to check what staff have learned from the training.

In recognition of the pivotal role that supervisors hold in the reinforcement of professional boundaries, the force has started a programme of training for first- and second-line managers on these issues. The force has for some time included integrity training on the mandatory sergeants' and inspectors' courses.

The force has also introduced a new shift pattern, which provides five training days for all neighbourhood and patrol police officers each year. It is intended that these training days will be used to support leadership training on integrity.

Aside from these initiatives, there is little training being planned or undertaken on professional standards and conduct. Staff indicated that there is a reliance on e-learning, rather than the opportunity to discuss these matters in a classroom. They reported that they do not find e-learning a satisfactory way to learn or check their understanding.

The force has recognised the need for a reinvigorated training programme to support supervisors in respect of ethical behaviour and standards. However, a section of the workforce – in particular, staff who have been in service for a long time, with potentially influential roles – are not receiving regular training to update them on issues of integrity, professional standards and conduct.

The force's 'notifiable associations' policy includes guidance on contact with vulnerable people and inappropriate associations, reporting responsibilities, and the monitoring and review processes. The current force policy was published during the period of inspection and we found variation in staffs' understanding of the new policy.

All notifications had previously been recorded and reviewed by the vetting department. However, the new policy moves this responsibility to the ACIU. Staff within the ACIU do not seem to have a clear understanding of the reporting and monitoring responsibilities detailed in the new policy. This is understandable given that they have not been able to access the updated policy ahead of its publication. The ACIU is not prepared for these new responsibilities. However, there is confidence that this will be remedied once the staff have had time to understand their new responsibilities. Any referrals to the ACIU are still recorded on the force internal intelligence system.

The force must consider whether the inconsistent knowledge about notifiable associations and the updated policy warrant training or renewed force-wide communication to reinforce the policy.

Understanding integrity

The force has incorporated ethical policies into its procedures, through its force-wide commitment to the National Decision Model (NDM) and associated training programmes, which emphasise the central role of ethical considerations. Following the national introduction of the NDM, the force has appointed an officer to implement the model across the force. This process includes a three-hour classroom session for staff.

We found that the model has become an integral part of staff vocabulary. Knowledge of the NDM is not restricted to officers. Police staff also display a clear understanding of its principles and an ability to apply the model to office-based decision making as well as operational policing.

The force is developing plans to introduce the national Code of Ethics, threading it through everyday policing activity and communicating it to staff. Responsibility for this lies with an assistant chief constable. The force has developed a draft Code of Ethics implementation plan and intends to monitor its progress through a standards and ethics board chaired by the assistant chief constable. The Code of Ethics is also included in the force strategy as an important principle, and referred to in the chief constable's briefings on the force intranet.

The implementation plan is aligned with the six stages of the police integrity model: commit, assess, plan, act, monitor and report. To date it has been sent to commanders and heads of departments for their feedback as to how the Code of Ethics can be incorporated into the force's daily business.

The next step that the force intends to take is to consult with the staff associations and trade unions to develop an anti-corruption strategy and encourage reporting. Staff associations and trade unions will then be responsible for implementing lower-level plans that support the force implementation plan and will include the Code of Ethics within training programmes.

The plans are not yet detailed or clear. However, once the consultation process is concluded and the communication of the Code of Ethics implementation plan to the force is well developed, it is likely that the Code of Ethics will be introduced effectively and become central to how the force operates.

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

Misconduct and unprofessional behaviour

The force does not conduct routine and systematic checks to see if ethical and professional behaviour reaches the standards required, or audits that check whether key policies and processes that support and promote good conduct and behaviour are understood and complied with. However, the force feels it is taking initial steps towards this by adopting a continuous professional development approach to replace the current staff annual review system. The new approach is intended to include performance measures such as victim care, and focus more clearly on standards of behaviour.

HMIC found evidence in one local policing area (known as a basic command unit or 'BCU'), of innovative work taking place. This area is planning to pilot a 'people intelligence model', which will monitor data on matters such as absences and complaints, as well as feedback received from other officers and from the public. The outcome of this pilot is to be discussed at the force business board (where BCU commanders and heads of department meet). However, it is possible that this innovation will remain at a local level and not be implemented across the force.

Chief officers provide sufficient information to the police and crime commissioner (PCC) to enable effective governance and accountability on integrity issues, including misconduct and unprofessional behaviour.

The PCC has fortnightly meetings with the chief constable to discuss high-profile cases, including all investigations led by the Independent Police Complaints Commission (IPCC). In addition, the PCC reviews other reports that relate to the integrity of the force and examines the results of staff surveys.

The office of the police and crime commissioner (OPCC) dip samples complaints made by the public. The OPCC also has quarterly meetings with the head of the PSD, allowing for a review of complaints. These meetings provide an opportunity to look at trends, standards and types of complaints being made.

The force operating model provides for three levels of governance: the executive (involving members of the chief officers' group); the business (involving commanders, chief superintendents and heads of department); and the operational (the level directly responsible for delivery of service to the public).

Senior officers conduct some analysis of the PSD figures at both the basic command unit and business board level, although this is primarily focused on complaints. However, there was no evidence that chief officers routinely review data on a range of integrity-based matters, such as gifts and hospitality, business interests and notifiable associations. In particular, there is limited effective monitoring of integrity issues (including misconduct and

unprofessional behaviour) at force governance meetings, such as would allow chief officers to fully understand the issues facing the force and thereby identify areas that require action.

The deputy chief constable chairs a monthly meeting where an overview of all serious incidents and issues that have an impact on the force, including any relevant PSD investigations, is provided. The deputy chief constable's meeting has minutes and clear objectives. Actions arising from the matters discussed are assigned to individuals and they are subsequently asked to account for the actions they have taken to address them.

However, outside this forum there is an absence of force-wide, integrity-related action plans. The force expressed an intention to develop a strategic anti-corruption threat assessment to identify, monitor and manage risks as part of its Code of Ethics implementation. However, there is no clarity as to which governance board will have responsibility for monitoring the threat assessment.

There is limited evidence that, when action is necessary on integrity issues, there are action plans with clear objectives, timescales, milestones and updates, with actions tracked and those responsible for them held to account.

The PSD attends the force's equality diversity human rights board and a quarterly force performance management board. However, neither of these groups, nor others that we could identify, are directly responsible for monitoring conduct, integrity, professional standards and corruption issues, albeit some of their discussions have implications for these issues. We were also unable to find evidence of any force-level integrity or corruption action plan.

While chief officers have an overview of ongoing investigations, more formal governance arrangements would be likely to provide a clearer understanding of the ethical situation within the force, and allow for better identification of key areas of risk.

Recommendation

Within six months, the force should ensure that it has a tasking and co-ordination process that considers, prioritises and records corruption-related intelligence.

The force conducts a constant rolling public survey by telephone, and asks key questions about fairness and trust.

The force's internal staff survey (September/October 2013) covered areas such as senior leadership and direction; the PCC; managing staff; line management; working in a team; personal responsibility and development; communication; well-being and work environment; and improving satisfaction and performance at work. Although the survey provided some insight into the force, it did not include specific integrity-related questions.

The force's draft Code of Ethics implementation plan confirms its intention to conduct a staff survey on attitudes to ethical policy as well as a public satisfaction survey, focusing on those who have directly used police services. Both are scheduled for the first quarter of 2015. However, there is no evidence that youth groups will be included in the proposed survey work.

Details of all occasions when staff have applied for authorisation for a business interest (including when the application has not been authorised) are recorded in a central register. This is currently held and managed by the vetting department. All rejected application notices are personally signed by the chief constable. Supervisors are also routinely involved when a member of staff has had an application refused.

All business interests are reviewed annually; the vetting department manages these reviews and keeps records of them. However, there is no routine checking of either authorised or unauthorised business interest applications by the vetting department or by the PSD to ensure compliance with the decision that was made. Further action is only prompted by the receipt of additional intelligence.

Some limited analysis is carried out to identify trends in relation to integrity issues and problems dealt with. The PSD meets with the human resources (HR) department monthly to identify trends in relation to integrity issues. When specific problems are identified, additional training is provided if this is appropriate.

However, aside from this forum, there was no evidence that the force employs an analytical approach to identifying trends. In particular, there is no cross-checking of any force registers and chief officers' diaries unless specific intelligence is received that prompts further action.

The staff HMIC spoke with feel that the force has created an environment and culture of challenge and reporting. HMIC was given examples of unethical and unprofessional behaviour appropriately and promptly challenged, both by peers and supervisors. The force's ongoing work on expectations of supervisors and the communication of its values throughout the organisation is intended to ensure that this culture continues. The use of sanctions is also seen to be appropriate.

The force continues to highlight its ethical stance through the internal publication of gross misconduct cases on the staff intranet. Statements to the press are also released to publicise the force's approach to unacceptable behaviour.

Staff generally feel supported when they challenge and report misconduct irrespective of the grade, rank, role or experience of the person concerned. The examples of staff challenging and reporting unprofessional behaviour that were provided during our inspection were indicators of an ingrained and positive ethical culture within the force.

Misconduct and unprofessional behaviour are matters that are taken into account in the decision-making process in relation to transfer to specialist roles and promotion for all positions including applications for courses such as the strategic command course (SCC) and the high potential development scheme (HPDS).

Those seeking movement to specialist roles, promotion, or a place on the HPDS or SCC are subject to rigorous vetting checks, including a review of misconduct and complaints data and line management input. When appropriate, lifestyle interviews are conducted by the vetting department as part of this process. Its vetting processes are a real strength for the force.

The PSD is responsible for the investigation of all cases of officer misconduct, along with cases of officer and police staff gross misconduct. The HR department is responsible for police staff misconduct cases.

The PSD is supported on lower-level investigations by experienced local inspectors who are responsible for conducting investigations in their areas. These inspectors are generally effective and appropriately used.

Staff feel that the force conduct investigations transparently and fairly. However, there is limited evidence that the force reviews how investigations are assessed, investigated and recorded to ensure that all staff, irrespective of rank or role, are treated fairly and equally. There is no evidence that the force routinely considers the sanctions imposed in misconduct or gross misconduct cases.

The force uses a severity assessment to evaluate whether activity constitutes a criminal offence or justifies the bringing of disciplinary action. In addition, it has nominated a member of staff who is responsible for reviewing the proportionality of the force's approach to investigations.

We conducted a review of a small number of PSD cases. This included reviewing ten randomly selected cases involving serious misconduct or criminal conduct. The aim was to check on timeliness, supervision and appropriateness of decision making. We found that seven out of ten files had no visible investigation plan, although there were no concerns over the appropriateness of the final outcomes.

There are confidential and overt mechanisms for staff to report wrongdoing. The force has published a 'making protected disclosures' (or 'whistle-blowing') policy. This policy aims to ensure that individuals have a mechanism to report any suspected illegal or unethical conduct, without any detrimental consequences to themselves.

The policy recommends that an individual should discuss an issue with a line manager or, when this is not appropriate, the ACIU, and in doing so should make reference to a series of practical procedures. Staff also have the opportunity to report wrongdoing via an ACIU answering machine, although this is only checked during weekly office hours, or they can email the PSD directly. There is no evidence of any third-party confidential mechanism being available.

The force responds to reports of wrongdoing by staff in an effective but not a timely manner. Staff commented that they feel the PSD's visibility and communication across the force could be improved, and there were complaints that investigations are taking too long to conclude. The force has identified the timely resolution of reports of wrongdoing as an issue, and has recently appointed an assistant chief constable with responsibility for presiding over unresolved misconduct hearings. This is a positive step and should help to address the timelines issues. The force is also aware of the staff perceptions about visibility and communication from the PSD, although no specific plan to tackle this was apparent the time of the inspection.

Misconduct hearings are conducted in a way that promotes transparency, effectiveness, efficiency and legitimacy. Hearings use appropriately qualified presiding officers, who are independent of the person investigated. A further degree of independent scrutiny is conducted through a dip sampling of complaints by the PCC.

The force does not make use of fast-track dismissals. The chief constable in principle supports the use of a fast-track dismissal process. However, the force has found that the application of this mechanism is difficult. It feels that timely authorisation by the Crown Prosecution Service (CPS) is difficult to obtain, pushing many potential fast-track dismissal cases outside 'acceptable time frames.

The force website also contains a register of business interests, which categorises the applicants as either officers or police staff but is not rank specific and only places the applications within an occupation type. The public register contains the numbers of rejected applications in both the officer and police staff category.

Chief officer, senior officer and police staff equivalent expenses are published on the force website and are broken down into individual categories at an appropriate level of detail.

The force has recently started publishing misconduct outcomes internally as well as issuing press statements. Staff welcome the publication of misconduct outcomes accompanied by some context and explanation as a useful reminder of force expectations and about the boundaries of unprofessional behaviour.

The force confirmed it has a constructive relationship with the Independent Police Complaints Commission (IPCC) and appropriate covert referrals are made.

The force actively uses the IPCC 'lessons learned' bulletin to disseminate information. There is evidence that IPCC bulletins are actively used and that learning points contained in them are incorporated into officer and police staff training. Staff can access IPCC bulletins through the PSD intranet site; however, the wider workforce is generally unaware of this facility.

Professional standards training and resourcing

All staff within the PSD and the ACIU receive training for their role and bring a mix of skills to their teams. Officers within the ACIU have all completed the College of Policing bronze and silver counter corruption courses. Staff within the PSD and the ACIU have completed the initial criminal investigation development programme and the professionalising investigation programme level two. These training and development programmes and forms of accreditation are appropriate for the roles these staff perform. Managers have completed the senior investigation development programme, the professionalising investigation programme level three and an investigation course run by Hampshire police. Again, this training and accreditation are appropriate.

Succession planning takes place to ensure consistency in staffing levels in the PSD and the ACIU. However, continuity at the supervisory and managerial level is questionable. At the time of the inspection, the heads of the PSD and the ACIU had simultaneously moved on to new roles within the force. In addition, it was confirmed that the head of the vetting department intended to retire in spring 2015, with no succession plan in place or obvious successor within the current team. HMIC was informed that there had been a repeated pattern of changes in supervisors and managers over the past few years. This led to members of the force questioning the ability of the PSD to maintain a consistent direction.

It is clear that, when intelligence prompts reactive work, the force responds and either uses in-house skills and experience or calls upon external specialist and covert assets. A recent example highlighted additional support from the force's major crime unit. Staff within the PSD feel that there are sufficient skills available within its team. However, unanticipated absences by team members place additional pressure on those remaining.

The PSD has a sufficient number of suitably qualified staff and officers to react effectively to the current risks. However, there was no evidence that the force is actively identifying potential future areas of concern in order to prevent problems emerging. The force should consider whether adopting a more proactive approach could result in a clearer grasp of known areas of risk as well as pointing to those that have yet to be identified.

Quality assurance

It is clear that the force attempts to identify all possible learning from concluded cases. There is a prescribed formal debrief process at the conclusion of misconduct hearings to ensure that lessons can be learned. Learning points are identified and disseminated to the learning and development department for inclusion in training programmes, when appropriate. In addition, the deputy chief constable reviews all suspensions and restrictions while conducting a general review of all cases during their weekly meeting with the head of the PSD.

In a review of ten misconduct and gross misconduct files, four cases provided no evidence of intrusive supervision. However, practitioners and supervisors in the PSD and the ACIU reported that robust and intrusive supervision is recorded on the Centurion system (an electronic complaint and misconduct computer management system), and cases are also reviewed by a detective chief inspector.

HMIC was largely satisfied that the force has the governance mechanisms in place to manage the timeliness and quality of investigations conducted by the PSD. The current governance structure provides for a weekly review by the ACIU, with all cases monitored by a detective sergeant for quality and timeliness. Further quality assurance takes place in weekly meetings between the deputy chief constable and the head of the PSD.

HMIC is satisfied that the PSD has appropriate oversight of all police staff investigations carried out by other departments. Previously the HR department conducted police staff investigations; however, the force recently modified this process to bring all final determinations under the remit of the PSD.

HMIC is not aware of a specific force policy on suspension, resignation and retirement during investigations. However, the deputy chief constable retains an overview of all suspensions and restrictions through a monthly review. It was confirmed that, when appropriate, the deputy chief constable would consider restrictive duties as an alternative to suspension. HMIC conducted a review of ten cases where officers had been allowed to retire or resign, while under investigation, and had no concerns about the decisions made.

Recommendation

Within six months, the force should publish a policy that 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 has adopted the national intelligence model (NIM) approach for the identification and management of risk, and this process is properly used by the anti-corruption intelligence unit (ACIU). The ACIU has a mechanism in place that records and considers corruption issues. It holds a meeting every week, where actions are considered and discussion takes place regarding ongoing cases. In addition, a detective sergeant in the ACIU is responsible for monitoring intelligence and, when appropriate, allocating work on the basis of this. Intelligence gathered or received is analysed, graded and developed before being allocated for action. A detective sergeant in the ACIU also reviews all new intelligence daily, and ensures that actions are set and acted on.

The force regularly gathers intelligence on corruption and grades it using the appropriate NIM grading system. However, this intelligence gathering is not done proactively – such intelligence is not actively sought; rather, the unit responds to information received.

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.

Within the draft Code of Ethics strategic implementation plan, the professional standards department (PSD) has been tasked to complete a strategic anti-corruption threat assessment to identify, monitor and manage risks.

The force proactively identifies vulnerable staff and groups of staff – for instance by using the National Crime Agency (NCA) counter corruption threat assessment and Transparency International's *Integrity Cycle* (a document that gives advice to support counter corruption work, and is not just used by police forces). However, such assessments are not conducted regularly.

The force has identified a set of emerging threats to the organisation, along with issues they believe will have an impact on the police service as a whole. These threats include the inappropriate use of social media; abuse of the position as a member of the force to perpetrate sexual offences; steroid abuse, with its risks of criminality and association with criminals; the targeting of individuals by organised crime groups; and the financial vulnerability of staff due to levels of personal debt, an issue that the force recognises it has insufficient information about.

Intelligence

The force uses random and intelligence-led drug testing and intelligence-led integrity testing to identify corruption. Results of such testing are circulated to the workforce.

The force ensures that organised crime investigations are not compromised and it takes measures to ensure that forthcoming operations will not be at risk of corruption, in order to reduce the likelihood of compromise. All individuals taking part in covert enquiries are subject to rigorous vetting and misconduct checks.

The force has processes in place to ensure the effective security of systems, exhibits and case papers. It has a number of policies setting out clear requirements and authorisation levels to ensure the effective management of information security. In addition, it has an auditable system for the location and movement of exhibits and case papers.

The force effectively identifies multiple suspects or multiple offences by a single suspect but not both. It was unable to provide evidence of effective identification of multiple suspects and multiple offences by a single suspect, and should consider developing such a capability.

Capability

The PSD and the ACIU have ready access to specialists when required, either from within the unit, within the force or, when necessary, from other police forces or law enforcement agencies, with recent examples of support from the NCA. The PSD is able to provide a dedicated source unit specialist. Other specialisms, such as surveillance, technical equipment, undercover, confidential source handling, crime scene investigation, family liaison and major incident room procedures, are all available within the force, region or through national protocols.

The head of the ACIU has a clear and direct reporting line to the deputy chief constable.

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 ensure that 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 that it has a tasking and co-ordination process that considers, prioritises and records corruption-related intelligence.**
- **Within six months, the force should publish a policy that clarifies the position on suspension, resignation and retirement of officers under disciplinary investigation.**
- **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.**