



Inspecting policing
in the public interest

**Revisiting police
relationships:
progress report**

**Gloucestershire Constabulary
December 2012**

About this review

In 2011, the Home Secretary asked Her Majesty's Inspectorate of Constabulary (HMIC) to look at "instances of undue influence, inappropriate contractual arrangements and other abuses of power in police relationships with the media and other parties". The resulting report, *Without Fear or Favour*, published in December 2011, found no evidence of endemic corruption in the Police Service. However, we did not issue a clean bill of health:

- Few forces provided any policy or guidance around appropriate relationships between the police and the media and others;
- There was a general lack of clarity around acceptance of gifts and hospitality; use of corporate credit cards; and second jobs for officers and staff, which could leave forces vulnerable to (at least the perception of) corruption; and
- Few forces and authorities had proactive and effective systems in place to identify, monitor and manage these issues.

We made several recommendations to help the service address these issues, and committed to revisiting forces in 2012 to track progress.

The revisit found that while forces have made some progress, particularly around putting in place processes and policies to manage threats to integrity, more needs to be done. The pace of change also needs to increase, not least to demonstrate to the public that the service is serious about managing integrity issues, which have retained a high media profile over the last year.

A thematic report, *Revisiting Police Relationships: A progress report* is available from www.hmic.gov.uk, and gives more information about what we found across England and Wales. The rest of this report focuses on what we found in Gloucestershire.

This time HMIC is publishing force-level reports. This is so the public and the new Police and Crime Commissioners (PCCs) can see how their force has progressed since 2011.

A note on the scope of our review: Since our 2011 inspection, questions around police integrity and corruption have continued to be asked. For instance, the Leveson Inquiry has looked at relationships between officers and journalists (among other things), while investigations into senior officers and into the handling of historic investigations (such as the Hillsborough disaster) have received widespread media coverage. The findings in this report relate only to police relationships with the media and others, rather than broader issues of police integrity.

Findings for Gloucestershire

The chief officer team in Gloucestershire responded to HMIC's *Without Fear or Favour* report by commissioning a self-assessed integrity 'healthcheck', and a constabulary integrity action plan. New policies have been introduced which cover relationships with the media, acceptance of gifts and hospitality, and second jobs. The Assistant Chief Constable (Organisation) is the constabulary lead for professional standards and the strategic owner of the constabulary integrity action plan.

How are press relations handled, and information leaks investigated?

There is a clear media policy, which provides unequivocal guidance to staff. This was reviewed and amended in January 2012 and has been further reviewed in light of the national guidance on relationships with the media produced by the Association of Chief Police Officers (ACPO). The policy clearly states the level and standard of acceptable media relationships for all staff.

Between September 2011 and May 2012, the constabulary did not investigate any instances of inappropriate disclosures to the media.

Gloucestershire Constabulary has a corporate social media policy. Constabulary accounts are professionally managed by the Corporate Communications Department and act as an example of acceptable standards when engaging in social media. As part of the constabulary action plan produced after HMIC's *Without Fear or Favour* report, the Professional Standards Department (PSD) identified risks around the use of social media by officers and staff who were off duty; these have been addressed through information posters and a guidance leaflet, which will be supported by training.

HMIC's independently commissioned research identified two cases of potentially inappropriate behaviour on Facebook or Twitter by officers and staff in Gloucestershire, both of which were referred back to the constabulary. After further review by the constabulary, a decision was made that no formal misconduct or management action was necessary.

Is there more clarity around acceptance of gifts and hospitality, procurement, and second jobs?

A **gifts and hospitality** policy has been introduced, which provides guidance on conduct, thresholds and the requirement to record. A centralised electronic register is now used to record and monitor offers of gifts and hospitality (both accepted and declined). This allows for effective monitoring and identification of any problems.

Procurement staff are aware of boundaries around gifts and hospitality through the constabulary policy and the professional Chartered Institute of Purchasing and Supply (CIPS) code of ethics. However, we found different levels of understanding among operational staff on what may and may not be accepted and what should or should not be recorded. In addition, there is currently no monitoring in place to cross-reference contract and **procurement** registers with the gifts and hospitality register to help ensure the integrity of the procurement process (e.g. to look out for instances where a company provides hospitality, and is then awarded a contract).

Gloucestershire Constabulary has a policy for **second jobs** and business interests, supported by a 'How To' guide. The policy has been amended and updated since publication of HMIC's *Without Fear or Favour* report. It is comprehensive, clearly indicating what is and is not appropriate, and includes a simple review and reapplication process. Responsibility for final approval of applications has recently moved to the Assistant Chief Constable (Organisation), who is looking to introduce more thorough supervision of approved applications. Since September 2011 there have been 47 applications for second jobs, all but one of which have been approved.

How does the force identify, monitor and manage potential integrity issues?

We found that the police authority had arrangements in place to monitor and govern integrity issues. The recently elected PCC will need to be satisfied with the governance and reporting mechanisms for these issues.

Data provided by the constabulary to HMIC shows that there has been no change in the number of staff working in the anti-corruption unit since our 2011 inspection. Between September 2011 and May 2012 the constabulary instigated 19 investigations into the conduct of its officers and staff in relation to the areas covered by this report.

Supervisory staff received training on raising awareness of integrity matters. PSD and the anti-corruption unit provide inputs into all supervisory and leadership training and supply staff with policy guidance and information on current issues. Historically, integrity training has been delivered to all new joiners: this will continue once the constabulary begins recruiting again (this is currently on hold because of the spending review).

In addition, the constabulary has undertaken a number of proactive initiatives to identify and address risk around integrity and corruption. For example, the Sensitive Information Sharing Group, attended by appropriate departmental heads, meets every month to review integrity issues and cases.

Next steps

HMIC will continue to inspect on integrity issues as part of our existing programme of force inspections.

