



Inspecting policing
in the **public interest**

Police Integrity and Corruption

Hertfordshire Constabulary

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

Hertfordshire Constabulary, working with both Bedfordshire Police and Cambridgeshire Constabulary, has developed a joint professional standards department (PSD) that has been in place for 18 months. The three forces in this strategic alliance are continuing to develop their joint policies and procedures to improve the efficiency and effectiveness of how they jointly manage and respond to unprofessional behaviour, misconduct and corruption. However, there is currently insufficient capacity to prevent, reduce and investigate corruption matters effectively.

Summary

There is clear leadership from the chief constable to create a climate of ethical behaviour, and staff and officers are familiar with 'The Herts Way'; his method of communicating his expectations. The actions of some managers, however, do not always reflect this ethos, and there is some evidence to suggest that unethical behaviour is not always challenged or dealt with effectively.

The force has recently established an ethics, equalities and integrity board to manage the introduction of the Code of Ethics, and this provides an opportunity for structured training for staff and officers. Joint policies for the three forces have been developed to manage business interests although work needs to be done to improve the effectiveness of the process. The constabulary takes a different approach to investigations of misconduct by police staff to that applied in respect of police officers. This could lead to inconsistent outcomes. The constabulary has confidential reporting mechanisms in place which are promoted by the joint professional standards department (PSD) through its branded communication booklet, 'Shield'. Results of misconduct hearings are also published. There is, however, more the constabulary could do to share the lessons it learns from misconduct matters.

The PSD and anti-corruption unit (ACU) have police officers and police staff with appropriate skills and experience for the roles they perform. They are selected from across all three forces in the strategic alliance, but there was little evidence of any structured succession planning to make sure that the right staff are in place if someone leaves.

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

The joint PSD unit has limited capacity to analyse intelligence, threats and vulnerabilities within the three forces of the alliance and fails to identify vulnerable staff. Vetting arrangements do not fully comply with the national vetting policy and do not identify corruption risks at the recruitment stage for officers and staff. The constabulary also does not use random substance misuse testing, and it does not have the capacity to take active steps to identify misconduct and corruption.

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

HMIC highlighted two areas for improvement in the December 2012 report.

1. Cross-reference contract and procurement registers with the registers of gifts and hospitality, and second jobs.

A joint electronic procurement register is due to be implemented in September 2014.

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?

Clear chief officer leadership demonstrated.

Individuals understand personal responsibilities and how to report wrongdoing.

There is a plan to introduce the Code of Ethics but this is in its early stages of implementation.

The constabulary has policies for registering gifts and hospitality, business interests and secondary occupations that are managed by the PSD.

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

The three forces in the strategic alliance have made good progress in introducing combined policies concerning behaviour, standards and professionalism.

The PSD and ACU do not have the capacity to be proactive.

There is not a consistent approach to the checking of PSD records for promotion and selection to specialist or vulnerable posts.

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

ACU staff support the provision of training at all levels.

There is no effective tasking and co-ordinating meeting structure by which new intelligence and other critical issues are assessed and prioritised for action by the ACU.

Analysis and research are completed in response to ongoing corruption investigations but there is limited proactive analysis to direct activity.

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

2. There had been no specific training on integrity.

Messages are circulated by email and through the three-force professional standards department (PSD) intranet site. Some training has been delivered by the PSD and an e-learning training package has been circulated, but the training has not been mandatory.

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 a sound joint PSD governance structure for all three forces in the strategic alliance.

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

The constabulary correctly refers investigations to the Independent Police Complaints Commission (IPCC) and has regular meetings with them to ensure compliance and review ongoing investigations.

The constabulary does not fully comply with the national vetting recommendations.

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

The ACU has staff with the right skills and experience to analyse, develop and covertly investigate, but it does not have the resources to be proactive.

The constabulary has a positive working relationship with the IPCC when referrals are appropriate.

The force/constabulary in numbers



Complaints

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

516

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

15.8

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

49

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

1.5

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

2.6



Business interests

Applications in 12 months
to March 2014

87

Approvals in 12 months
to March 2014

86



Resources

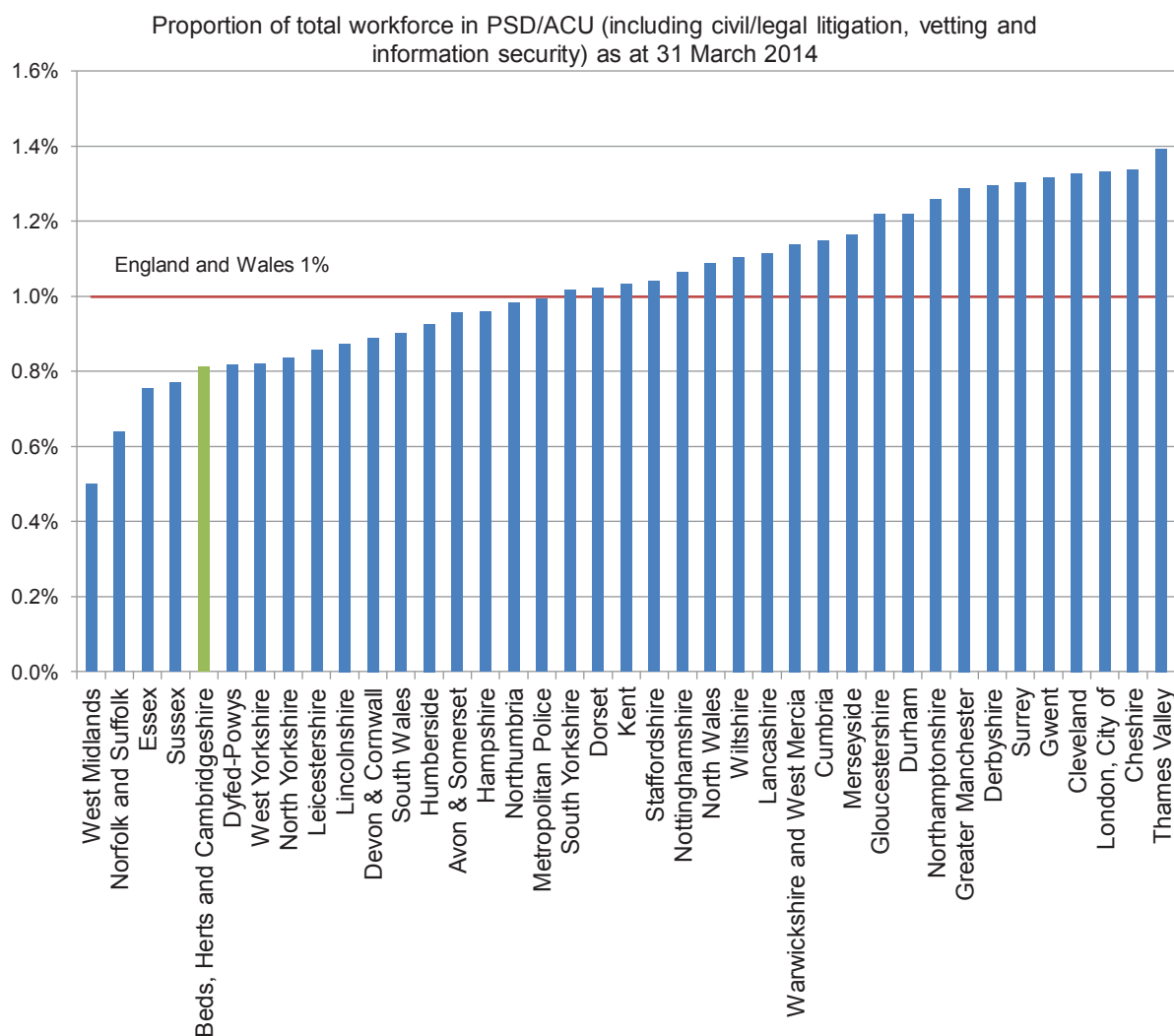
Proportion of workforce in
PSD/ACU

0.8%

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.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 two areas for improvement for Hertfordshire Constabulary from the 2012 inspection report:

- To help ensure integrity of the procurement process, monitoring should be put in place to cross-reference contract and procurement registers with the registers of gifts and hospitality, and second jobs. A new IT system to track purchase orders and procurement to the point of payment should be introduced. This would improve the efficiency of procurement management within the constabulary.
- There had been no specific training on integrity issues since our last inspection in 2011. Changes to policies and guidance are communicated via email and intranet systems, but there is no mechanism to check that officers and staff have read and understood them.

With respect to the first issue, there has been limited progress. There is still no common platform for progressing purchase orders. The head of procurement has developed a joint policy around procurement, contract management and monitoring. This has received outline approval but still requires formal sign-off. This would improve the governance arrangement, but the policy is unlikely to be in place before September 2014.

With respect to the second issue, while there continue to be messages concerning integrity transmitted through emails and the intranet systems, there is limited evidence that dedicated integrity training has been developed or delivered, although some training provided by the professional standards department (PSD) has been included in various training programmes and dedicated training days. An e-learning training package has also been used, but is not mandatory for staff to complete. There is an opportunity for the constabulary to progress and satisfy itself that all staff have received and understood messages concerning integrity as it continues to implement the Code of Ethics.

Overall, the constabulary has made limited progress in the two areas of improvement identified in the 2012 report.

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 chief constable demonstrates strong leadership in creating a climate of ethical behaviour and willingness to challenge wrongdoing, through, for example, his use of blogs, seminars, annual constabulary development days and leadership seminars. Staff and officers are familiar with 'The Herts Way': the chief constable's method of communicating his expectations regarding ethical behaviour and professionalism.

Officers and staff are aware of the boundaries of unprofessional and professional behaviour and some understand how their behaviour affects both the public and their colleagues. Bedfordshire Police, and Cambridgeshire and Hertfordshire Constabularies have been in a strategic alliance since 2012 and have collaborated to create a joint professional standards department (PSD) reporting to the Cambridgeshire Constabulary deputy chief constable (DCC), who is the chief officer professional standards lead for all three forces. He has recently issued a booklet entitled Know your boundaries, endorsed by all three forces, that draws links to various relevant joint policies and sets out the standards expected from everyone.

Ethical and professional behaviour standards have been incorporated into some but not all relevant policies and procedures, many of which are joint policies across the strategic alliance. Not all these policies and procedures have been reviewed by the PSD to ensure that the ethical guidance contained is consistent.

There is evidence that some, but not all, managers, including first-line supervisors, lead by example and demonstrate their personal commitment to ethical behaviour. Generally, however, they do not routinely check the understanding of their staff as to what is expected of them in their professional and private life.

The constabulary has plans to embed the new Code of Ethics into all aspects of the constabulary's work. It has an ethics steering group chaired by its DCC with representation from the joint PSD. This group is developing an action plan that will include a communications plan. The DCC has conducted a number of leadership seminars with supervisors to prepare the way for the introduction of the Code.

Staff are aware of their responsibility to challenge and report misconduct and unprofessional behaviour. The PSD policies are the same for all three forces and include a recently agreed joint reporting wrongdoing policy. The PSD has structures in place to support those who do report wrongdoing and there is a perception that the constabulary is becoming a more open environment. However, obstacles to an open environment remain – such as close-knit teams tending to 'stick together'.

There is a joint notifiable association and media relationships policy outlining the obligation to declare any change in circumstances in an officer's or staff member's personal associations and relationships. Some officers and staff members are not aware of their personal responsibilities concerning personal associations and relationships. Notifications of changes in circumstances are reviewed but generally not acted on.

Briefings on notifiable associations have been provided to staff through the joint constabulary PSD publication, Shield. Staff are only made aware of their obligations to notify changes in circumstances or personal relationships when they join the service.

Recommendation

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

The National Decision Model (NDM) is used widely across the constabulary. Officers and staff are trained and understand its application. Use of the NDM is covered by an e-learning training package that is mandated for completion across the whole constabulary. The NDM is also used regularly in learning and development programmes as a model by which to approach problems including, but not limited to, police operational issues. Staff do not immediately relate the NDM to making decisions about what to do when faced with an ethical dilemma. The use of the NDM has been reinforced in training programmes. Staff apply and use it well operationally and when dealing with staffing issues and dilemmas.

Training on ethical and professional behaviour is provided to all staff but not regularly and no checks are carried out to confirm that the staff have understood it. There is an opportunity for structured training to be provided to support the rolling out of the Code of Ethics through the established staff training days. This would enable the knowledge, understanding and application of the Code of Ethics to be checked.

As far as policing ethics and standards are concerned, there is no overarching training plan, and the constabulary does not have a structured method for checking that sufficient learning has taken place and that the contributions of the PSD, chief officers and others have been effective.

Chief officer leadership on integrity issues (including misconduct and unprofessional behaviour) is visible and recognised by staff. There are clear messages on the intranet, on posters and in briefings to staff from chief officers that encourage positive behaviour and explain the boundaries of acceptable behaviour. Awareness of 'The Herts Way' is very strong within the constabulary, but, as the three forces of the strategic alliance increasingly collaborate, the constabulary has recognised the need for a shared vision and values across all three forces. Work on this is to commence shortly.

Chief officers provide information to the police and crime commissioner (PCC) to enable him to scrutinise integrity issues. The Cambridgeshire PCC hosts, on behalf of the three forces, the PSD strategic alliance sub-group, which is attended by the Hertfordshire DCC and the head of the PSD, and which meets quarterly to discuss integrity-related issues.

A strategic alliance governance board structure, which includes the three force DCCs, the strategic alliance lead head of human resources (HR) and the finance officer for collaboration will, in future, meet bi-monthly to discuss issues relating to integrity and chief officers' understanding of it. The first meeting took place in May 2014.

Hertfordshire Constabulary has recently changed its own governance arrangements. An internal ethics board is to be established, which will include an independent member. This board will, in the future, have a record of actions, with people responsible for each action and accountable for getting it done.

Policies or guidance set out the meaning of misconduct and unprofessional behaviour. They describe acceptable boundaries of conduct and what is expected of staff in their private and professional life. HMIC was provided with, and found, good examples of these policies, in particular the PSD-related policies, which are the same for all three forces. The strategic alliance has joint policies including a reportable association and a media relationship policy, as well as a business interest and secondary employment procedure and a reporting wrongdoing policy. The joint policy on procurement, however, is awaiting sign-off.

Understanding integrity

Some work has been carried out to improve the constabulary's understanding of how integrity issues affect public trust. The constabulary conducted a staff engagement survey in 2013, but this did not include questions about integrity and the willingness to challenge. In one police station, a cultural assessment was undertaken when concerns were raised about the behaviour of some staff.

Details of all occasions when officers and staff are offered gifts or hospitality are recorded by the PSD in a centrally held register on behalf of all three forces. These records (including those entries relating to chief officers) are audited regularly and inappropriate entries are challenged or investigated. The gifts and hospitality policy and associated procedures are clear and provide good instructions as to what can and cannot be accepted. There are three main categories: gifts under £20; gifts from £20 to £50; and those over £50. Staff and officers have a general understanding of the policy and the fact that gifts and gratuities under £20 need not be recorded centrally. Officers will generally not accept offers and put details of their refusal to accept them in their pocketbook. However, greater communication to ensure that, in line with policy, such refusals are recorded on the centrally held register will further improve this process.

Details of all occasions when officers and staff have applied for authorisation for a business interest, secondary employment or membership of an organisation are recorded fully in a central register (which includes entries for those applications that are refused), held on behalf of all three forces by the PSD. Authorised applications are normally reviewed every 12 months. Approval may be removed if review forms are not submitted or there is a change in circumstances. The officer's line manager has the responsibility of making the initial assessment. It is not clear that all the applications that are refused at the initial assessment stage are forwarded to the PSD. In addition, departmental managers may not possess a full list of which members of their staff have obtained approvals. Staff, have little awareness of the need to declare voluntary work that could have an impact on their role.

The rejected business interest applications that reach the PSD are followed up by the department if there is any intelligence that suggests that the unsuccessful applicant has ignored the refusal or has failed to declare a business interest. Using a regularly updated list to inform departmental managers which of their staff have obtained approvals would provide managers with an additional source of intelligence about whether policy or instructions have been disregarded.

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

Misconduct and unprofessional behaviour

Misconduct and unprofessional behaviour are considered when the constabulary makes decisions to transfer officers to specialist roles and to promote officers to some, but not all, positions. Within Hertfordshire Constabulary, misconduct issues and unsatisfactory performance procedures are generally considered at some stage during the transfer or promotion process, but not in relation to specialist or sensitive posts. There are no checks made for those officers seeking to undertake the senior police national assessment centre (SPNAC) or fast-track development scheme because there is a mistaken belief that such checks will be undertaken elsewhere. If the PSD is made aware of applications and sensitive intelligence does exist, it provides a briefing if necessary.

The constabulary does not assess how investigations are conducted, how progress is recorded or how sanctions are imposed, in order to ensure that all staff, irrespective of rank or role, are treated fairly and equally. The head of the PSD or their deputy conducts assessments for all police officers and special constables but they do not do so for police staff. The head of human resources (HR), as with the other two forces in the strategic alliance, makes the assessment of severity for police staff. There is a police staff disciplinary procedure that is the same for all three forces.

There is a confidential system for officers to report wrongdoing, which is supported by a policy that is promoted through the joint PSD intranet site and the PSD publication, *Shield*. There are three different confidential reporting mechanisms across the strategic alliance. Staff in Hertfordshire Constabulary understand their force system and feel comfortable using it.

The constabulary publishes data and information about the expenses and hospitality of chief officers and police staff equivalents. There is no record, however, of gifts or hospitality which are refused and the data is only complete up to the end of the December 2013. The constabulary does not publish the register of business interests but senior officers are required to notify changes in circumstances regarding personal relationships annually.

The results of misconduct hearings are published on constabulary general orders and through the *Shield* publication, but this can be some months after the final outcome if a court case is involved. The results of misconduct meetings are not published.

HMIC found that cases are generally appropriately referred to the Independent Police Complaints Commission (IPCC) and the IPCC statutory guidance is followed. There are good relationships with the IPCC and if there is any doubt about an issue a referral is made to them.

The constabulary uses the IPCC bulletin to disseminate learning. It also publishes its own 'lessons learned' bulletin and the PSD includes relevant articles within the *Shield* publication. These bulletins are assessed by and presented to the strategic alliance PSD governance board and complaints sub-group (this is a recent development under new governance arrangements). While lessons from the bulletins are circulated to senior officers who have responsibility for updating policy to ensure that action is taken, responses to the bulletins are not collated to check what action has been taken, and whether changes to policy are required across the three forces.

Professional standards training and resourcing

Members of staff in the PSD and the ACU receive regular training for their role. A procedure called a 'training needs analysis' has been undertaken for the PSD. When necessary, this process can give access to funds from the training budgets of the three forces for external courses. Police staff assistant investigators are accredited and undertake the assistant investigators' programme. Staff maintain their continuing professional development by attending conferences.

Succession planning, to make sure that the right staff are in place if someone leaves, does not take place to ensure consistency in the PSD or the ACU. This issue is further exacerbated by the strategic alliance arrangements requiring that a post identified as belonging to one force is first advertised in that force and is only advertised in the other two if the post is not filled. There have been difficulties in finding detectives with the right skills unless they have previously worked within the PSD.

The joint PSD is not sufficiently resourced to undertake proactive and preventative activity. The constabulary has recognised scarcity of resources as a problem and an independent management review of the PSD was conducted in 2013. This resulted in some growth in resources and some reduction in, and downgrading of, police staff roles. Nevertheless, the review failed to meet the needs of the PSD and a further review was commissioned by the constabulary in April 2014, which also identified capability and capacity as particular issues. Since then, there has been a temporary increase in resources, including analytical, investigative and management support within the ACU (primarily relating to a specific operation). There is a desire to make the increase in resources permanent. This would be beneficial.

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.

Misconduct hearings are structured so as to ensure transparency, effectiveness, efficiency and legitimacy and are conducted in line with police (conduct) regulations. Work is being undertaken to explore the possibility of forming a bank of senior officers from across the strategic alliance to sit on hearings or panels, whatever the home force of the accused. Forces within the strategic alliance need to satisfy themselves that the same level of robustness and transparency applied in police officer misconduct hearings is also in place with respect to police staff misconduct hearings.

The constabulary makes use of fast-track dismissal when appropriate. The investigating officer is expected to write a report to the head of the PSD not only when fast-track is a viable option, but also when it is not.

Quality assurance

The constabulary does not audit decisions regarding allegations of misconduct or unprofessional behaviour against officers or staff in hearings or meetings. Although reviews of individual cases are conducted, reviews of the whole process do not take place to ensure transparency, effectiveness, efficiency and legitimacy.

No audits take place to ensure that investigations are justifiable, dealt with at the right level, and escalated as necessary.

The constabulary monitors the timeliness and quality of all investigations conducted in relation to officers and staff, whether they are carried out by the PSD or a local policing command. There has been a marked increase in recent years in the number of both public complaints and misconduct investigations, and this is causing resourcing issues for the PSD. More public complaints are being delegated to local managers. There are unacceptable delays in some cases. Work to improve this is a key objective for the PSD in 2015. While all gross misconduct cases concerning police staff are either investigated or overseen by the PSD, misconduct is managed by the local HR department. There is no standard approach across the strategic alliance.

Recommendation

Within six months, the force should ensure that it has sufficient capability and capacity to enable the recording and conducting of timely and proportionate investigations into public complaints.

The constabulary has a process for ensuring consistency for those officers and staff who have resigned or retired while under investigation. The head of the PSD provides sufficient information for the strategic alliance professional standards lead DCC, to make an informed decision in these cases, as regards any notification to the College of Policing for those individuals to be recorded on the disapproved list⁴.

⁴ This is a national register of officers who have been dismissed for gross misconduct, including those electing to resign or who retire in the face of gross misconduct; this is held by the College of Policing.

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

Corruption investigation

The constabulary does not identify staff or groups vulnerable to corruption by, for example, profiling officers and staff who may face debt problems. This is an issue that the strategic alliance acknowledges but which, given the present capacity for research and analysis, is unlikely to be addressed in the near future.

Vetting arrangements do not fully comply with the national vetting policy and do not identify corruption risks at the recruitment stage for officers and staff. This is acknowledged by the strategic alliance and has been included on the constabulary risk register for management for each of the three forces. In 2015, a new vetting code will be produced by the College of Policing, and Hertfordshire Constabulary will need to ensure that it is prepared to comply with the conditions of that code.

Recommendation

Within six months, the force should ensure that it complies, as far as practicable, with the current national vetting policy and develops plans to fully comply with the new vetting code when it is published in 2015.

The constabulary does not routinely monitor force systems and social networking sites such as Facebook. This is, however, done on a targeted basis. The constabulary Twitter accounts are monitored by the corporate communications department and, if necessary, referrals are made to the professional standards department (PSD). The monitoring of force systems is complicated by the fact that monitoring is the responsibility of the anti-corruption unit (ACU) and each force has different systems (there are, for example, three different intelligence systems across three forces). The recent recruitment of an intelligence support assistant within the ACU should improve the response to this area of risk.

The constabulary uses 'with cause' substance testing to identify corruption but gave no recent examples of this process being used. Random drug tests are not used, but some staff still believe that they are being conducted.

The constabulary has taken steps to ensure that organised crime investigations have not been compromised by corruption risks and that forthcoming operations are protected from the risk of corruption. Responsibility for this has now moved to the Eastern Region Serious and Organised Crime Unit (ERSOU). There is a need to ensure that the newly appointed detective chief inspector within the PSD attends constabulary-level tasking where these investigations are discussed, in order to maintain an effective link.

The constabulary ensures the effective security of systems, exhibits and case papers in a way that complies with Home Office guidance, with control over access limited to authorised personnel. Restricted access and digi-locks provide necessary security for documentation. Security codes and passwords are changed with every change of staff. Criminal case files and records stored at industrial site premises are not subject to the same level of security: access is not tightly controlled and a variety of both staff and contractors have access when the members of staff responsible for the premises are not present.

Intelligence

There is limited analytical, research and intelligence development capacity within the ACU, but what does exist is being used to react to and support ongoing investigations. Limited proactive work is therefore undertaken to identify trends, risks or vulnerabilities to the constabulary. The ACU in general is only staffed five days a week, although the PSD provides cover outside office hours and at weekends to respond to incidents such as death or serious injury following police contact. This means that calls received on the confidential reporting system after close of business on a Friday will not be answered until the Monday.

There is no effective tasking and co-ordinating meeting structure by which new intelligence and other critical issues are assessed and prioritised for action by the ACU. This is acknowledged by the constabulary as an area that it needs to develop. The constabulary should adopt a daily tasking process to discuss and prioritise new intelligence and other critical issues, as well as a tasking process occurring every two weeks to monitor and direct investigations. This tasking process should be auditable to enable accountability and clarity in the rationale for decision making.

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.

Intelligence gathered or received is analysed, graded in accordance with the authorised professional practice and developed before being progressed. Intelligence is prioritised for development using a RAG (red amber green) grading and the use of the NDM provides a rationale for any decision made.

There are insufficient resources in the ACU to deal with the flow of intelligence. There has been no full-time analyst for nine months which has clearly had a detrimental impact on the capability of the ACU to deal with the intelligence flow. The current situation is being eased by the temporary increase in resources.

Capability

The PSD and ACU have access to specialist teams across the three forces as well as ERSOU and the counter terrorism intelligence unit. The constabulary has tasked resources within Hertfordshire Police with supporting operations and HMIC found examples of constabulary wide resources being used to support operations. While there is a good range of skills and qualifications within the ACU and members of staff are enthusiastic and wanting to do more, there is insufficient capacity to provide an effective proactive capability for all three forces.

The performance of the PSD and ACU is regularly monitored by the constabulary which looks at the timeliness and quality of complaints handling, investigations, decision-making, outcomes and appeals. The ACU confidential update reports are sent monthly to the chief officer team and senior managers. The head of the ACU has a clear and direct reporting line to the chief officer lead for all three forces, has a good working relationship with this officer, and can make regular daily contact if required.

The constabulary ensures that lessons are learned and effectively disseminated to officers and staff through good use of the intranet, which includes an online version of the Shield publication, and a specific publication recording the lessons the constabulary has learned for all officers and staff. Officers and staff have good knowledge of the publications and they were easy to find through the PSD portal on the constabulary intranet site.

Covert investigations are appropriately referred to the Independent Police Complaints Commission (IPCC), in accordance with the statutory guidance. This was confirmed through the checks undertaken as part of the inspection.

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 has the proactive capability to effectively gather, respond to and act on information that identifies patterns of unprofessional behaviour and corruption.**
- **Within six months, the force should ensure that it has sufficient capability and capacity to enable the recording and conducting of timely and proportionate investigations into public complaints.**
- **Within six months, the force should ensure that it complies, as far as practicable, with the current national vetting policy and develops plans to fully comply with the new vetting code when it is published in 2015.**
- **Within six months, the force should ensure it has a tasking and co-ordination process that considers, prioritises and records corruption-related intelligence.**