



Inspecting policing
in the public interest

**Revisiting police
relationships:
progress report**

**Lancashire 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 Lancashire.

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 Lancashire

Since 2011 Lancashire Constabulary has conducted its own integrity 'healthcheck', which resulted in numerous actions to improve in different areas. Most of these actions have been completed. The constabulary has reviewed its policies that relate to integrity issues, and either has, or is currently, updating them all – although more needs to be done to let staff know about this.

■ How are press relations handled, and information leaks investigated?

The constabulary has updated its media policy, which is now in line with national guidance and is much clearer about how relationships with the media should be managed. Requests from the media are generally referred to and dealt with by trained staff within the Corporate Communications Department, and all of them are recorded electronically.

The Corporate Communications Department monitors national and local media coverage of the Constabulary, with any potential information leaks to the media investigated by the Professional Standards Department (PSD).

The constabulary has trained officers attending various courses on integrity issues and intends to raise awareness of these key issues to all other staff. It has checking mechanisms in place to help keep its information safe. These include a monitoring system on all computers to ensure that the constabulary's information, and the systems it is stored on, are secure.

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

The constabulary has existing guidance (as part of its Counter Corruption Strategy) on how police officers and staff should behave, both while at work and when they are off duty. This guidance is being reviewed and updated as part of the force's new social media policy. The constabulary encourages staff to use channels such as Twitter and Facebook to engage with communities. While staff understood the expectations about how they should use social media, those we spoke to as part of the review said that they would welcome more guidance. HMIC's independently commissioned research identified three cases of what could be considered potentially inappropriate behaviour on Twitter or Facebook by members of staff in Lancashire, which have been referred back to the constabulary.

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

The **gifts and hospitality** policy has been reviewed and is now in line with national guidance, with a presumption that, generally, anything other than light refreshments will be declined. A single register is kept of both accepted and declined gifts and hospitality. This is checked regularly to make sure that the relationship between the police and the provider of any gift or hospitality accepted is appropriate. The staff we spoke to understood the boundaries in this area. The chief officer team also had peer review arrangements in place as one way of judging the propriety of accepting individual offers of gratuities and hospitality, and assessing how acceptance might be perceived both internally and externally.

The constabulary provides training to **credit card** holders and has checks in place to make sure they are using cards appropriately. It also cross-references the contractors' and suppliers' register with the gifts and hospitality register to ensure the integrity of the procurement process (e.g. by looking out for cases where a company provides refreshments, and is then granted a contract).

The risk management panel reviews all requests for **second jobs**, from both police officers and police staff. The revised policy in this area is in line with national guidance and is clearer about what is and is not acceptable. All second jobs are subject of an annual or six-monthly review. Since September 2011 there have been 145 applications for second jobs, 140 of which have been approved.

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

The police authority continued to exercise oversight and governance over integrity issues. The recently elected PCC will need to be satisfied with the governance and reporting mechanisms for these issues.

Data provided by the force 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 force instigated 36 investigations into the conduct of its officers and staff in relation to the areas covered by this report.

There has been no constabulary-wide training on integrity issues since our last inspection. However, integrity awareness has been included in other communications, with inputs to a variety of staff training courses and a 'Continuous Professional Development' event for first line supervisors. Changes to policy are circulated via email and the intranet, but there is no mechanism to check that officers and staff have read and understood them. A communications plan and programme, 'Beyond Expectations', aims to reinforce standards of quality and professionalism, and is well established within the organisation.

Next steps

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

