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# Police Integrity and Corruption

West Yorkshire Police

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

Chief officers have been robust on standards and integrity. There are effective monitoring systems in place but some improvement is needed in reporting gifts and hospitality. The force has recently increased anti-corruption resources and is effective in analysing and responding to intelligence about corruption or unprofessional behaviour, but needs to develop its proactive work.

### Summary

Chief officer communications on integrity issues are robust, visible and recognised by staff. HMIC found that most staff knew that reported misconduct would be rigorously investigated but some are still uncertain of professional boundaries. HMIC found there is a pressing need for more effective dialogue with staff to ensure that there is a commonly shared understanding of ethics. The force has carried out a staff survey and instigated a programme of local and individual 'accountability meetings'.

New leaders have been appointed within the professional standards department (PSD) which now includes a 'compliance unit'. The anti-corruption unit has also been reinforced. HMIC found that the system used to record offers of gifts and hospitality is held on multiple registers by different departments although they can all be accessed from a central location. There is evidence that refused offers of gifts or hospitality are not being reported and recorded. The force has a comprehensive range of policies to guide behaviour, together with auditing and analytical processes which are capable of identifying unprofessional use of police systems. HMIC found the force takes effective action to investigate and deal with misconduct by its staff.

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

Overall progress against the seven areas identified for improvement in 2012 has been good.

A new media policy has been introduced and the force has effectively trained its staff in the legitimate use of police information systems.

There has been limited progress in other training, including gifts and hospitality reporting. These records are not yet combined in a single register and the force does not consistently cross-reference records to identify potential misconduct.

**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 robust communication from the chief officer team and members of the force know that unprofessional behaviour will be investigated.

However there is also a need for a more effective dialogue to improve understanding of the Code of Ethics and to ensure supervisors have the opportunity to engage actively with their staff. The force needs to develop further training for integrity issues.

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

West Yorkshire Police has effective monitoring systems in place to identify unprofessional use of force information.

The force has reviewed resources, and in 2014 introduced a special unit to check compliance with rules and policies.

The force is effective in developing intelligence and in its response where misconduct is reported.

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

The force carries out risk analyses and effectively directs investigation in response to intelligence received.

The resources allocated for misconduct investigation were increased in 2014 and are sufficient, but development is required to ensure governance and a consistent programme of proactive work.

HMIC found counter-corruption staff were trained and effective but needed extended access to information systems to improve efficiency.

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

The force has developed PCC reporting mechanisms and there has been strong progress in the roll-out of the secondary employment policy.

**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?**

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

There are confidential reporting methods in place which are used by staff to report wrongdoing, and the force makes use of past cases to promote lessons learned.

**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

962

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

11.4

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

136

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

1.6

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

2.6



## Business interests

Applications in 12 months  
to March 2014

**0**

Approvals in 12 months  
to March 2014

**0**



## Resources

Proportion of workforce in  
PSD/ACU

**0.8%**

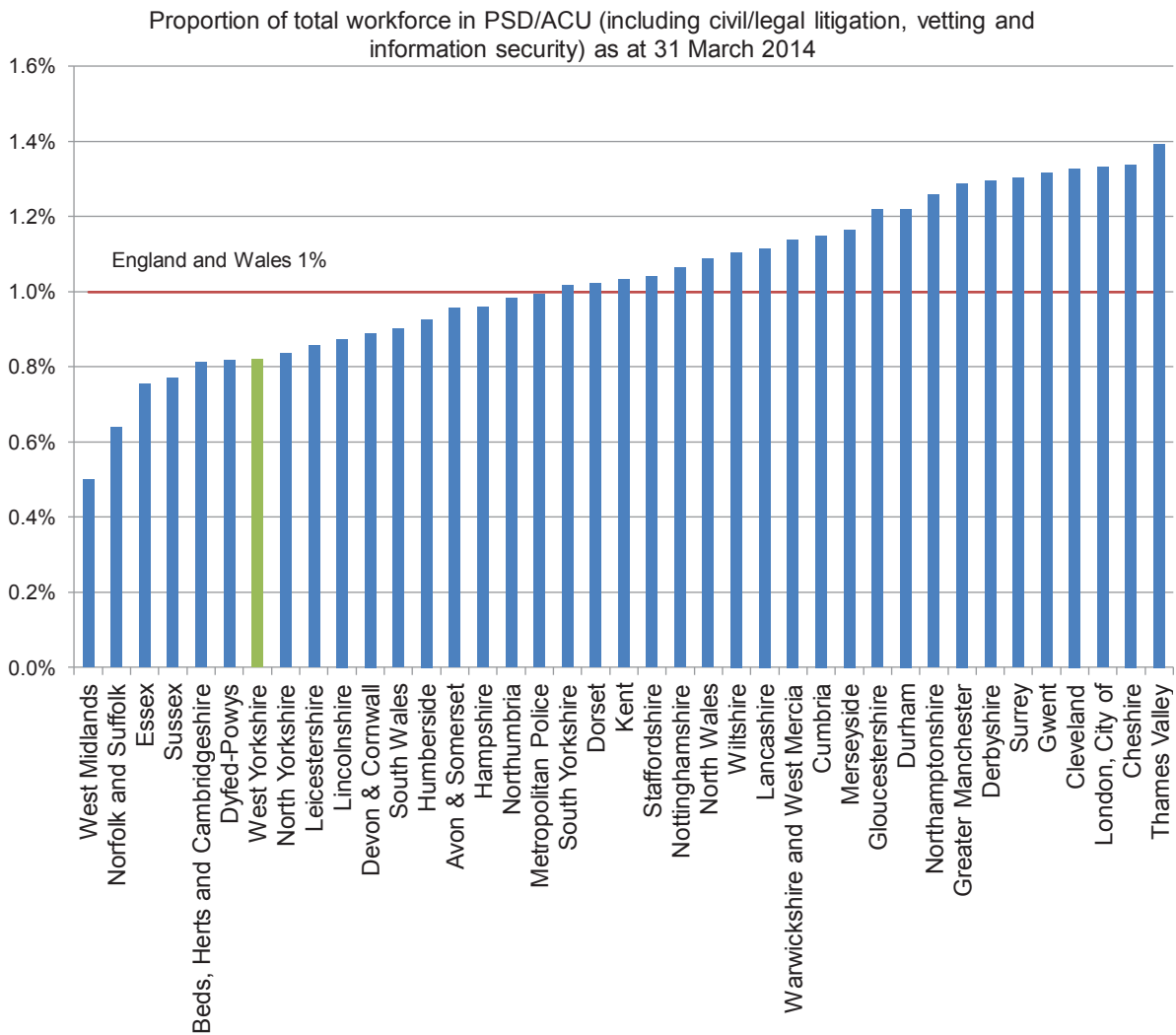
Proportion of workforce in  
PSD/ACU  
– England and Wales

**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.

For business interests data, West Yorkshire Police cannot accurately say how many new interests have been put before the panel due to their recording system. The total numbers are 1,760 with 1,492 active and 38 declined.





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*<sup>1</sup> 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*<sup>2</sup> 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.<sup>3</sup> 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/](http://www.justiceinspectorates.gov.uk/hmic/) in early 2015.

1 *Without fear or favour: A review of police relationships*, HMIC, 13 December 2011. Available at [www.justiceinspectorates.gov.uk/hmic/media/a-review-of-police-relationships-20111213.pdf](http://www.justiceinspectorates.gov.uk/hmic/media/a-review-of-police-relationships-20111213.pdf)

2 *Revisiting police relationships: A progress report* HMIC, published 18 December 2012. Available at <http://www.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, July 2014. Available at <http://www.college.police.uk>

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

During the inspection of West Yorkshire Police in 2012, HMIC found the following seven areas requiring improvement:

- To ensure staff know about the force media, gifts & hospitality, social media and secondary employment policies.
- To publish the revised force media policy
- To merge the existing gifts and hospitality registers into a single electronic register overseen by the professional standards department.
- To cross-reference contracts and procurement records with the gifts and hospitality register.
- To publish the force secondary employment policy.
- To develop governance and reporting mechanisms with the police and crime commissioner.
- To provide training for staff on data protection, disclosures, data leakage, legitimate 'police purpose' and use of internet and social networks.

In the period since 2012, force policies have been updated; an 'associations' policy has been introduced and a 'service confidence' policy dealing with staff occupying sensitive posts is being developed. HMIC found that communication of the revised policies had centred on force intranet circulations, bulletins and briefing packages although the force has lately introduced other processes including local 'accountability meetings'. Despite these methods, HMIC found gaps in communication and understanding. Some staff remain uncertain about the circumstances in which gifts can be accepted and what they are required to report, while others are unclear on other professional boundaries.

HMIC found that the force had updated its media policy which stipulates all staff should record contacts with journalists. There was evidence that staff understood there was a need to report such contacts. Similarly, most staff have a clear understanding of the risks and restrictions associated with social media sites.

HMIC found that the force now uses electronic records, replacing the separate written records used in each district to record gifts and hospitality items. However, these electronic records still consist of more than 10 sub-registers, maintained locally, rather than a single force register. Some of these records are sparse and others held no information at the time of inspection. These local sub-registers are accessible individually by PSD but there is no single force record and this restricts analysis.

HMIC found that the force did not routinely cross-reference procurement contracts with gifts, hospitality or association records although the force has recently increased PSD resources to improve its capability to undertake cross-referencing in future. The use by the force of shared procurement services also provides additional protection and robust financial procedures.

HMIC found there had been strong progress by the force in developing its policy controlling secondary employment. The force has introduced a reporting procedure and a central approvals panel which manages applications by staff.

The force has developed the governance and reporting mechanisms supporting the police and crime commissioner (PCC). The PCC now has a scrutiny process in place; the office of the PCC (OPCC) has access to information on the Centurion complaints recording system and there is a regular briefing process between OPCC and head of PSD. HMIC found there had been good progress in this area.

The force has provided an electronic training package which all staff have been required to undertake. This covers the use of force systems, legitimate police purpose in data protection, and the use of internet and social networks. HMIC found there was a consistent understanding of the restrictions and responsibilities for use of police information systems and progress in relation to this area was strong.

# 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 need for compliance with rules and standards has been very clearly reinforced by corporate messages and by chief officers in their robust application of suspension and the sanctions applied in proven cases.

HMIC found very clear perceptions among staff that high standards were expected of them and that misconduct would be rigorously investigated. This had been underlined by recent cases including the dismissal of a chief superintendent.

HMIC found that staff are aware of some of the boundaries affecting their professional behaviour, for example their responsibilities in the use of police information systems, but other matters of policy including gifts and hospitality or restrictions on unprofessional relationships were less well understood.

It is clear that where there are definite rules, staff fully recognise the need for compliance and expect non-compliance to be challenged. However there is less evidence that the wider context for professional and ethical decision making by individuals has been addressed by training, and there are gaps in understanding.

In addition to email bulletins, the force also uses regular video messages posted on the intranet by chief officers to address staff on issues including integrity, and on conduct issues. These have included risks to the organisation from substance abuse, poor information management or inappropriate relationships, as well as focusing on unprofessional acts which affect public perception, for example, police driver behaviour. However HMIC found that these intranet videos are not always accessible to some staff due to limitations in the equipment available, although a text transcript does accompany the video where there is no audio facility.

The force has introduced a series of accountability meetings at force, local district and individual levels to set standards. It is intended that there will be regular one-to-one meetings between staff and their supervisors. This meeting structure is still developing; the force and local district meetings are well established but HMIC found there were gaps in consistency at supervisor level, particularly where supervisors may have responsibility for more than one team.

The staff survey and the introduction of accountability meetings are positive examples of the force beginning to address a pressing need for the organisation to engage all its officers and staff, and to develop a more pervasive and shared understanding of the national Code of Ethics. However, the steps already taken and the intended further development need to be communicated more effectively by chief and senior officers.

## Understanding integrity

The force statement of purpose and values sets out ten key principles and expectations for staff including 'working hard and acting with honesty, integrity and professionalism'.

Underpinning these principles, the force has a range of policies including information security, gifts and hospitality, business interests and voluntary working, web and social media sites, use of the internet, drug and alcohol misuse, unmanageable debt, media contacts, 'notifiable associations' and confidential reporting.

HMIC examined these policies during the inspection; the documents provide comprehensive guidance.

HMIC found that according to the dates indicated on the documents, a number of policies were overdue for review. However most have recently been updated and are complete.

The professional standards department produces a regular bulletin called 'The Standard' which contains articles, data and case studies to provide information for staff. The most recent issue includes explanation of the 'notifiable associations' policy and provides examples to illustrate circumstances where a report would be required. The bulletin is provided via the intranet; circulation and access 'hits' are increasing and the publication is generally seen as a useful reference point by staff.

HMIC noted that the force had recently commissioned and published a staff survey conducted by an independent external company. The results of the survey were being assessed by the force at the time of the inspection.

Ethical and professional behaviour has been incorporated into policies and procedures. Since the 2012 report the force has introduced a range of new policies dealing with aspects of professional conduct. These policies were the subject of formal consultation with staff associations and unions as well as external organisations to ensure compliance with human rights legislation.

The force has not yet re-examined policies against the national Code of Ethics but has plans to do so. As part of the wider governance process exerted by the PCC, the OPCC audit team routinely examines policies, for example the 'business interest' policy, and has made recommendations for change. The OPCC audit team now has an established programme of work to examine how the force directs and guides staff.

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

## Misconduct and unprofessional behaviour

There is evidence that leaders, including first line supervisors, lead by example to demonstrate their personal commitment to ethical behaviour, although structural changes had increased staff/supervisor ratios and consequently reduced opportunities for individual contact in some cases.

Addressing this issue, the force is developing supervisors' use of unsatisfactory performance procedures (UPP) using the individual accountability meetings (IAM) as an opportunity to emphasise standards and convey expectations. There were some concerns expressed by staff associations, and by some staff individually, that IAM meetings continued to focus mainly on numeric performance data rather than a more penetrating and effective engagement with the issues most relevant for that staff member. To identify emerging problems and allow early intervention it is important that immediate supervisors have sufficient opportunity to establish an effective relationship with each staff member in their team. Structural changes have tended to increase the numbers of people managed by each line supervisor and HMIC found that some staff perceive that new shift patterns have reduced the time spent by supervisors working directly with their teams.

Some districts provide training, available to all sergeants and inspectors, to develop their use of IAM meetings and there is a drive in some districts to promote the positive opportunities offered by the IAM meetings process.

There was evidence that within the force, unprofessional behaviour was challenged and dealt with appropriately. There are clear examples which include senior, as well as more junior, officers and staff being reported and dealt with for misconduct, and several such cases are well known among staff who were spoken to by HMIC during the inspection.

Following an independent report about complaints investigation commissioned by the PCC, the force is also beginning to develop UPP as a means to address issues raised in complaints. There is also an intention, not yet realised, to shift perceptions of PSD from enforcement to a supportive and informative role in 'keeping colleagues safe'. Work to develop such an approach was being considered at the time of the inspection.

These developments remain at the work-in-progress stage but illustrate the force's intention to achieve an improved capacity for early intervention which will encompass key responsibilities for supervisors as well as PSD and HR departments.

The force has established an ethics committee chaired by the deputy chief constable with terms of reference to consider police standards of professional behaviour, integrity, force policy and the implementation of the Code of Ethics. The force formally 'launched'



the national Code of Ethics at the end of June 2014 although work is still in progress to communicate and raise awareness about it more effectively.

Most staff are aware of their responsibility to challenge and report misconduct and unprofessional behaviour, and HMIC found there is a level of reporting via email to line managers or directly to PSD that demonstrated this was the case.

The force has published a clear policy outlining the obligation to declare any change of circumstances in personal associations and relationships. HMIC found that most staff understood that they should report associations with people they knew had a criminal background but some other requirements of the policy were less clear. The force is in the process of developing a 'service confidence' policy to provide for the transfer to a different role of individual employees in posts with access to sensitive information in circumstances where the employee has a relationship within someone who may pose a risk to the organisation.

At the time of inspection there was a total of 92 reported associations recorded by the force. Recognising this potentially low reporting level as an issue requiring action, PSD has involved district senior leadership teams in checking awareness amongst their staff and this has produced increased reporting levels.

## Professional standards training and resourcing

The national decision model (NDM) supports decision making on issues concerning the Code of Ethics. During inspection, HMIC found widespread knowledge of NDM among operational officers, although its application was principally to 'use of force' issues which are covered in depth during personal defence or protective training provided for police officers.

However, dependent on their role, police staff have not received similar training and are unfamiliar with the NDM model and its application in ethical considerations.

Training on ethical and professional behaviour is delivered to all staff as part of their induction to the force. The PSD is also active in providing input to courses attended by staff including, for example, supervisor training, the initial police learning and development programme (IPLD) and training for special constables.

The force has not recently recruited police officers externally and, consequently, these inputs have been limited.

Training on unconscious bias or recognising and responding to dilemmas has not been available in recent years. An electronic training package dealing with 'use of police information' has been rolled out as required training and this has been completed by nearly every member of the organisation. Some volunteers do not have ready access to the force network and are provided with hard copy versions of the package.



The impact of this training package was consistently evidenced during the inspection. HMIC found that staff were very clearly aware of the rules and requirements affecting their use of police systems. PSD records indicate that the number of access events subsequently found by audit to be inappropriate has fallen, and this has been attributed to the positive effect of the briefings provided.

The force has ensured that there is wide awareness of, and compliance with, the requirements for police information access but also needs to develop understanding of the wider issues underpinning the new national Code of Ethics as well as the range of other force policies that affect conduct and define professional behaviour.

In 2013 the force revisited an earlier review which reduced resources within PSD and the counter-corruption unit (CCU). From April 2014, resources across PSD and CCU have been increased to provide greater capacity in complaints investigation and a more effective capability in monitoring and anti-corruption work.

PSD staff have not attended external training, for example, to develop knowledge on counter-corruption investigation, but there are plans to recruit a dedicated training officer for the department and the necessary budget provision has been allocated. In the meantime, a course running over five days and dealing with a comprehensive range of subject matter has been developed by the department. The course has been attended by PSD/CCU staff and has also been offered to other forces in the region.

It was notable that the 'quality and standards' units operating in districts had also been retained. The changes therefore represent an increased investment in the resources being deployed by the force to develop integrity and professional standards investigation.

Succession planning takes place to ensure consistency in the PSD and CCU and the review of PSD has resulted in the planned recruitment of extra staff.

PSD incorporates a 'help desk' function and a compliance unit which monitors and checks information records and adherence to other force policy requirements. Where relevant to their roles, PSD staff are suitably accredited to investigate and carry out interviews.

## Quality assurance

To reinforce other aspects of professional standards, PSD occasionally carries out 'standards' days which involve inspection visits to selected stations where a series of checks are made under the headings of 'control systems' (property recording, pocket notebook completion, storage of confidential material and the conduct of random drugs tests), 'routines' (officers' uniform and equipment, briefings conducted and deployment readiness) and 'symbols' (the currency of wall displays, the appearance of police premises and vehicles).

Chief officers routinely provide a range of information to the police and crime commissioner to enable effective governance and accountability on integrity issues. HMIC found that there was a productive working relationship with OPCC; in addition to the joint audit team, the force provides weekly updates on community outcomes, stop search and IPCC referrals. The OPCC sub-committee also has access to the force registers for gifts and hospitality and to information contained on the complaints administration database.

Integrity issues (including misconduct and unprofessional behaviour) are actively monitored by chief officers at governance meetings; the deputy chief constable is the lead for integrity matters and meets weekly with the head of PSD to discuss current cases or emerging issues. The deputy chief constable also chairs the quarterly integrity and ethics board and, where necessary, will chair a specially convened senior group to manage high profile or significant cases.

Where action is necessary the force instigates planning with clear objectives. Supporting the work of PSD, each district has a quality and standards unit which deals with resolving some less severe complaints and carries out other work to reinforce standards. The force level quarterly quality and standards meeting is attended by representatives from PSD, HR, local districts and other departments. HMIC found that the meeting comprehensively covered matters of policy, performance in complaints handling, emerging legislation, threats and trends. Improvement actions are being consistently allocated and tracked for completion.

Surveys are being carried out by the OPCC to understand how integrity issues affect public trust. In addition, the force uses various methods to test public views, including confidence and satisfaction surveys of vulnerable and hate crime victims, and the force independent advisory group also convenes youth engagement groups to seek their views directly. Although the questions do not yet deal specifically with ethical issues, the force expects that analysis of this survey work will indicate public concerns around integrity.

The discipline panel, consisting of PSD, HR and force legal advisors, regularly audits decisions in hearings of allegations of misconduct or unprofessional behaviour against officers and staff. Hearings were reviewed and recommendations for improvement taken forward, for example, to publish more detail on the circumstances of individual cases.

The PSD detective inspector compiles a monthly report to ensure investigations are correctly escalated, and each month the head of PSD meets with the head of HR to check and compare case assessments.

There is clear policy and decision making on suspension, resignation or retirement during investigations and the force has applied this consistently.

During the inspection HMIC examined a sample of 15 misconduct case files to establish whether audit takes place to ensure that investigations are justifiable, dealt with at the right level and escalated appropriately. There was evidence of audit and supervisory oversight in all but one of the cases examined.

Appropriate severity assessments had been carried out in all 15 cases. Eight of the cases were criminal investigations and of these, seven were referred to CPS; in the other case the evidence was assessed by PSD as insufficient.

Of the fifteen cases, three required referral to IPCC; one of these cases was referred and two were not, although both these cases resulted in dismissal and one in prosecution. Over the 12 month period since July 2013, the force made 166 referrals to IPCC of which 148 were classified by IPCC for local investigation by the force.

Five of the cases involved suspension of the officer concerned. Four of these individuals offered resignation which was declined; however, in each case, no rationale was recorded explaining that decision.

PSD has established measures in respect of cases being investigated by district units. Data on timeliness, as well as information about complaint trends, are provided by PSD for consideration by the local accountability meetings within each district. Investigations involving police staff are dealt with by the HR department; PSD become involved only in circumstances where criminal activity is suspected.

Although the monthly district-based accountability meetings examine data on investigations being managed locally by districts, during the inspection a number of staff and their representatives reported concerns about delays in the investigation of misconduct.

Examples were given of local investigations extending over six months and a police staff member under investigation for a period exceeding eight months. The effects of these delays on officers and staff were underlined, and there was a perception also that limited flexibility in the response to some less serious matters was increasing the time required to resolve investigations.

HMIC found that the force had identified these issues and is developing more proportionate investigation in response to misconduct reports. This is expected to reduce the number of matters referred for investigation and, instead, increase the use of unsatisfactory performance procedures (UPP).

The force reviewed and changed the gifts and hospitality policy in February 2014, and since 2012 has replaced local hard copy records with an electronic system. Oversight of the policy is owned by PSD and the recently established compliance unit is responsible for checking gifts and hospitality offers on the record. The force policy provides that acceptance of any such offers which exceed a value of £25 must be authorised by the PCC. Acceptance

of offers of lesser value may be authorised on application to a senior officer. Unusually, force policy allows the acceptance of gifts such as wine or other alcoholic drinks and an examination of the records indicates a number of similar items being accepted.

Although it is in electronic format, the force record of gifts and hospitality items is not constructed as a single central register but instead consists of multiple records administered locally though they can all be accessed centrally. Although any of these records may be viewed by the PSD compliance unit, this arrangement does not facilitate the most effective data capture and comparison. There is also some variation in the records between districts and some registers showed no entries recorded at all. HMIC also noted that occasions where gifts or hospitality that had been refused by a member of staff at the time of offer were not recorded. The force publishes details of gifts and hospitality received on its website. The information is easily found by search and is readily accessible. The records for chief officers, command team and individual gifts are shown separately.

## Recommendation

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

The force recognises the limitations of the current recording and reporting methods and the need for increased compliance with the policy guidance, particularly with regard to the reporting of 'refused offers'. The compliance unit is already beginning to establish a programme of work that it will address. However, the formation of a single central database for gifts and hospitality records to provide effective oversight was identified as a requirement in 2012, and although there has been progress, it has not yet been achieved. There is also a need to ensure more effective recording of refused offers.

HMIC found that the force has effective procedures dealing with officers and staff who apply for authorisation for a business interest. These requests are recorded centrally and considered by PSD before a decision by the force business interest panel which consists of managers from HR, PSD and vetting units. The panel meets monthly and develops guidance and policy for the force by its decisions and consideration of the wide range of occupations and activities reflected in the applications received. Renewals are required annually and reminders are generated automatically by the records system. There was some evidence of delays in the approval process that have damaged confidence among some applicants, but there was also evidence that the requirement to report secondary employment was widely understood. At the time of inspection there was a total of 1760 records on the system, of which 1492 were currently active approvals. Over the period since

May 2013, a total of 38 applications had been declined. The compliance unit carries out a checking process in those cases where approval has been declined to ensure the terms of any approved secondary occupation are subsequently met.

HMIC noted that there was useful potential for relevant details of recorded business interests and secondary occupations to be supplied to supervisors supporting their contact with staff during IAM meetings, but this is not consistently being provided by the force.

Analysis is carried out by the force to identify trends in relation to integrity issues (including misconduct and unprofessional behaviour) and this includes reviews of officers who have been the subject of repeated complaints over a two year period. The information is used to identify high-risk individuals or groups and to focus investigative work. The OPCC audit team scrutinises expenses but HMIC found that there was no process in place to cross-check gifts and hospitality and notifiable association registers against senior officers' diaries or service procurement arrangements. Such a process would demonstrate transparency, and more effectively encompass chief and senior officers in the audit and oversight processes already being used by the constabulary.

The force publishes data on the gifts and hospitality register covering all officers and staff as well as the expenses of chief officers and senior force managers. Also published are extracts from the register of business interests; this provides details of the types of interests held, designation or rank and the numbers of people in that occupation. Information is also provided showing the types of occupation which are not approved. The information is easily located and accessible on the force website.

Misconduct and unprofessional behaviour are considered in decision making for promotions and there is a process in place to carry out vetting where officers or staff apply for specialist roles or the approval of a business interest.

To ensure staff are treated fairly and equally in terms of how investigations are assessed, recorded and investigated and sanctions imposed, the force employs three reviewing officers qualified to the level required under the police conduct regulations. Incoming complaints are assessed and the NDM is used as a framework for the process. Recommendations from the reviewing officers are examined and approved by a PSD chief inspector.

The force structure includes a central PSD supported by district teams operating locally. District teams investigate some less serious matters, determined by the severity assessment carried out at PSD. The force HR department is responsible for investigation of matters relating to police staff employees and in such cases, a local or district HR representative may be involved. HMIC found there was some evidence of disparities in the investigation and disposal of misconduct investigations taking place on different districts

when compared to those completed centrally by PSD. A sample of misconduct case files examined during inspection indicated one case of an officer dealt with by PSD for a speeding offence off duty where the outcome was a written warning whereas a similar case dealt with locally and involving an officer who, while on duty and transporting a person in custody, had driven in excess of 100mph resulting in the lesser sanction of management action. Similar perceptions of inconsistency were raised around HR investigations being conducted into police staff conduct by staff association representatives.

The force provides a confidential reporting mechanism called 'anonymous messenger'. This is accessed via the force intranet and generates an electronic message received by PSD. The system also generates a unique reference for referrals to enable requests for further contact, for example, to provide additional details supporting an investigation. PSD has publicised this contact method in the department bulletin. The department continues to receive referrals using the system although HMIC found a perception among some staff that the system was not truly anonymous.

There was evidence of reports of unprofessional behaviour by colleagues which led subsequently to investigation and sanction, and HMIC found this indicates there is confidence in the procedures involved and the support available.

The outcomes of misconduct hearings are not all published although details of some cases, for example, officers having been dealt with for misconduct in public office, are published on the force website. There are regular reports to staff in local bulletins giving information about circumstances or the behaviour of colleagues which have led to misconduct proceedings.

## Recommendation

**With immediate effect, the force should publish to all staff the outcomes of misconduct hearings. This should include sufficient circumstances of the conduct to allow staff to understand the boundaries of unprofessional behaviour and the sanctions it is likely to attract.**

To ensure consistency misconduct hearings are all chaired by an assistant chief constable, and where the officer involved has been suspended, a different chief officer not involved in the suspension process presides over the hearing. Regular meetings are held with trade unions and staff associations to discuss the investigation process, conduct and outcomes of hearings. The force makes appropriate use of fast-track dismissal. Over the previous twelve months this has been implemented on six occasions.



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

## Investigating corruption

HMIC found that the force had made significant investment in the resources and systems required to monitor and identify unprofessional conduct, and that there were mechanisms in place to respond and investigate where information came to notice. HMIC found these provisions were sufficient and effective.

In the course of the inspection, HMIC examined how the force proactively identified and managed threats, risk, and harm from corruption and whether there is a governance structure which provides for the assessment of risk, proactive action to mitigate risk and monitoring procedures in which actions are tracked and those responsible for action held to account.

The force operates a quarterly 'harm and risk board' which examines these issues and identifies the risks associated with criminal misconduct by staff. The force has used the NCA risk assessment and for the top three risk areas, has intervention plans under the headings 'prepare, prevent, protect, pursue'.

The force has examined successful methods used by other forces, for example, the implementation of a force-wide audit of PNC use which the force is now implementing. The CCU uses a fortnightly intelligence tasking meeting to plan forthcoming work and this informs decisions about necessary investigation and operations.

CCU reports that the fortnightly meetings are effective in managing current cases but they are not consistently linked with the strategic quarterly 'harm and risk board' process to ensure consistent progress in preventative or proactive operations which protect the organisation against corruption. There is a need for a governance process that ensures that corruption risks are being linked to clear harm reduction plans. These plans should direct work by the CCU that regularly goes beyond reactive operations, or activities intended only to source intelligence.

CCU uses a matrix to grade and prioritise intelligence and there are processes in place to identify vulnerable staff or groups of staff. Where intelligence is found or concerns are raised following analysis, targeted monitoring, or if necessary investigation, is undertaken.

Vetting arrangements by the force comply with the national vetting policy. Known corruption risks are dealt with by vetting at the recruitment stage for officers and staff. Staff are re-vetted on promotion to senior ranks or posting to sensitive roles.

The force uses a specialist software application to monitor the use of force systems in order to identify inappropriate language or other misuse. Though effective, the system does not fully meet all the requirements identified by the force, and different software with additional licences is under consideration.

HMIC found that the force regularly uses random and 'with cause' drug testing, as well as intelligence-led integrity testing to identify corruption.

The force ensures that organised crime investigations are not compromised and 'corruption-proofs' forthcoming operations to reduce the risk of compromise. CCU representatives attend monthly meetings with the NCA and there is regular contact with other investigating units. Where intelligence indicates a need, or as a precautionary measure, CCU will establish targeted monitoring to prevent and identify inappropriate systems access.

An operational security review has been carried out for CCU premises including case papers and systems; this has resulted in physical security improvements being implemented.

At the time of inspection, however, PSD and CCU did not have dedicated IT support and there are gaps in the authorisation levels among CCU staff that prevent their direct access to some information systems. This means requests have to be outsourced to other departments and this diminishes CCU self sufficiency in carrying out its work. In the context of covert corruption investigations that may be undertaken by the CCU, this is a vulnerability that should be addressed.

## Recommendation

**Within six months, the force should ensure it has the capability to view and record information accessed by officers and staff on the force computer systems. The existence of this tactic should be communicated to all staff to assist in prevention of abuse of systems.**

## Intelligence

PSD carries out analysis to identify trends that might indicate corruption in relation to the threat areas identified in the strategic risk assessment. This includes complaints analysis to identify geographic trends in districts, or localised issues which may indicate a need to investigate a specific group of staff, or those based at the same premises.

The force uses the strategic risk assessment as a basis for work planning, and for the most significant risks it has configured a response based on a recognised model with plans under headings Prepare, Prevent, Protect and Pursue.

The force seeks actionable intelligence on corruption from a variety of sources including through reports by officers and staff. Intelligence gathered or received is analysed, graded and developed before being allocated for action. The CCU uses a grading matrix to determine high, medium or low significance. Follow-up action is allocated proportionately.



HMIC found that responsive and effective investigation took place where intelligence was identified.

## Capability

HMIC found that the recently implemented changes had increased resources, and CCU has sufficient capacity to do some proactive counter-corruption work. Where necessary, the CCU has ready access to specialist assets when required and there are effective relationships with other forces in the region to provide support including, for example, surveillance officers, telecommunication enquires or other technical support.

The performance of PSD and CCU in resolving investigations is monitored by the PSD compliance unit and a monthly report is produced for the head of PSD. The CCU holds a separate monthly meeting at which every current investigation is examined and progress checked. Where necessary, the head of CCU has a clear and direct reporting line to the deputy chief constable.

HMIC found that the force ensured that lessons learned were disseminated to officers and staff. The PSD compliance unit is responsible for producing regular information for the force derived from the circumstances of complaints.

## Recommendations

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- **Within six months, the force should ensure that it has a policy which informs staff of the gifts and hospitality that are appropriate to accept, and why. The policy should include the requirement to register the value and description of all gifts and hospitality offered, including those declined. This should be communicated to all staff.**
- **With immediate effect, the force should publish to all staff the outcomes of misconduct hearings. This should include sufficient circumstances of the conduct to allow staff to understand the boundaries of unprofessional behaviour and the sanctions it is likely to attract.**
- **Within six months, the force should ensure it has the capability to view and record information accessed by officers and staff on the force computer systems. The existence of this tactic should be communicated to all staff to assist in prevention of abuse of systems.**