

## Appendix A

# Background and Methodology

### Purpose

**1.** This Inspection was conducted against a background of increasing concern that on occasions the level of integrity within the Service fails to reach the desired standard. This has become a cyclical problem and action is needed now not only to stem today's problems but to lessen the chances of their recurrence.

**2.** Community support is an essential part of providing an effective Police Service and for safeguarding the cherished principle of policing with consent. It will only be provided if the Service has the respect and confidence of the public. One consequence is that the powers and responsibilities vested in police officers demand complete integrity and, because of this, the integrity and ethical behaviour of all members of the Police Service in England, Wales and Northern Ireland are matters that can never be neglected. Maintaining a high standard of integrity is not simply a matter of imposing a discipline system – indeed, there are a number of integrated features to a successful ethical standards strategy. A central component of such a strategy is to foster an organisational culture which values, respects and supports its staff to ensure they work with integrity. Managers and supervisors at all levels should accept responsibility for setting and maintaining standards. Such values apply equally to police, civilian support staff and special constables.

**3.** Integrity for the purpose of the Inspection was defined as honesty and an adherence to both ethical principles and organisational codes of conduct. A lack of integrity is much wider than corruption, with the latter at the far end of a continuum. Integrity relates both to the individual and corporately to the organisation. The Inspection did not attempt to examine the philosophy of ethics or produce an ethical statement to replace the existing models.

### Terms of Reference

**4.** The focus of the Inspection was adjusted as it progressed, to address the emerging issues. At its commencement, its terms of reference were:

- Examine at a strategic and operational level the understanding that members of the Service have of the meaning of 'integrity', and how this affects their work.
- Determine to what extent the Police Service works within the spirit of the Statement of Common Purpose and Values.
- Assess what actions police forces took to implement the Statement and particularly what systems they have put in place for monitoring the levels of integrity and for ensuring their staff are working within the spirit of the Statement.
- Ascertain what police training at a national and local level is doing to enhance the levels of integrity within the Service.
- Identify potential causes for a lack of integrity, for example, greed, pressure to perform, image enhancement, etc.

- Examine how the values and actions of chief officers affect the levels of integrity within the Service.
- Establish practical ways in which the concept of integrity can be enhanced in the minds of police officers and civilian staff.
- Produce a model that will test organisational integrity and maintain standards.
- Exemplify good practice.

#### Methodology

5. Her Majesty's Inspector was assisted by four teams consisting of staff from HMIC, including two Assistant Inspectors, one of whom has no policing background, non-police Home Office staff and police officers seconded to HMIC by their chief constables. The police officers comprised four superintendents (two having considerable CID experience), three chief inspectors and an inspector; the five Home Office staff are senior members with many years experience and included two analysts.

6. The Inspection involved four key stages:

- Pre-inspection analysis of relevant data and documentation.
- Questionnaire to all chief constables, asking for their personal views and experiences on a wide range of integrity related issues (see appendix B).
- Meeting and consultation with key figures within the fields of law enforcement, public service and government.
- Inspection of twenty selected forces.

7. The pre-inspection work included informing members of the background to the subject through Tim Newburn's literature review 'Understanding and Preventing Police Corruption: Lessons from the Literature (1999)' commissioned by the Home Office Policing and Reducing Crime Unit, and replies from the thirteen organisations within the judicial system or associated interest groups, which had been invited to highlight any aspect of integrity in policing that caused them concern or where they considered improvements were necessary in the public good.

8. The pre-inspection analysis included a detailed assessment of data held on the HMIC computerised database (the matrix of indicators which covers broad areas of policing across all forces in England and Wales). Records from forces were audited from inception to conclusion, policy documents and associated forms and working papers were examined and all relevant policy documents were collected.

9. Visits were made to the National Crime Squad and National Criminal Intelligence Service, as well as various other agencies associated with the judicial or intelligence systems to see what lessons could be learned from their experiences and procedures and to gain an insight into policing from outside.

**10.** To enable visits to a large number of forces and to ensure appropriate coverage of key issues, each team concentrated their inspection efforts on one of the areas detailed below. The visits to forces involved each team of four spending several days in each and included discussions with chief officers, police authority members, heads of department and all ranks of police support staff, many in the forum of focus groups. There were also many meetings with organisations outside the Police Service, such as church groups, minority ethnic groups, etc. The four teams focused primarily on the following areas:

- management and systems to maintain integrity;
- prosecution of offenders and complaints and discipline;
- the public interface and public perceptions;
- personnel and training.

**11.** Formal inspections were carried out within twenty forces and two National Police Training Centres, chosen on the basis of geography, size, demographic spread, policing performance and known integrity issues. The forces and centres visited were:

<b>Avon and Somerset</b>	<b>Kent</b>
<b>Cambridgeshire</b>	<b>Lincolnshire</b>
<b>Cheshire</b>	<b>Merseyside</b>
<b>Cumbria</b>	<b>Metropolitan Police Service</b>
<b>Derbyshire</b>	<b>Nottinghamshire</b>
<b>Durham</b>	<b>Royal Ulster Constabulary</b>
<b>Dyfed Powys</b>	<b>South Yorkshire</b>
<b>Greater Manchester</b>	<b>Thames Valley</b>
<b>Hampshire</b>	<b>West Midlands</b>
<b>Humberside</b>	<b>West Yorkshire</b>
<b>Police Staff College, Bramshill</b>	<b>Ashford Police Training Centre</b>

**12.** Following the visits to forces, a questionnaire was sent to every one of the forty-four forces, seeking details of police suspensions, convictions and early retirements/resignations during investigations. These are analysed in appendix C.

**13.** A Good Practice Guide has been prepared (appendix D) to assist forces to examine their own systems, procedures and practices. The ACPO has set up a task force to examine police corruption, which has commissioned research on the subject for the longer term.

#### Acknowledgements

**14.** Her Majesty's Inspector offers his thanks and appreciation to the members, chief constables and staff of all the police authorities and forces in England, Wales and Northern Ireland who assisted in the Inspection, and in particular those visited by the Inspection Teams. In addition, thanks are given to all those outside the Police Service who contributed to the Inspection or took part in the many discussions held with Her Majesty's Inspector or members of his team.

## Appendix B

### Questionnaire to Chief Constables

**1.** In advance of the Inspection, a questionnaire was sent out to each of the chief officers of the forces of England, Wales and Northern Ireland, to inform the field work. Overall, the respondents were very positive and generally provided full answers. Some of the main findings and most interesting initiatives are summarised below.

#### The Statement Of Common Purpose and Values

**2.** The Statement of Common Purpose and Values (SCPV) for the first time defined the values expected of the Service (see annex 1). The questionnaire asked what action individual forces had taken to publicise and re-enforce the SCPV following its adoption in 1990.

**3.** In general, most forces had publicised the SCPV by circulating it in their force weekly bulletin, having articles written about it in force newspapers and/or posters/framed copies put up in offices. Few forces made more specific efforts to ensure it was understood and communicated fully to their staff. (See table B-1.)

Table B-1

Actions Taken	Number of Forces
Prepared own force statement/Incorporated the principles into force's 'vision'/strategy	19
Posters/framed copies of the Statement put up around the force/in every police station	16
Publicised through the weekly bulletin, force orders or the force internal newspaper	12
Copies of the statement given to all officers/members of staff	10
Incorporated in: Policing Plans	5
Annual Report	6
Policing Charter	4
All major force publications	1
Became the foundation for a Quality of Service initiative	4

#### Reinforcement of The Statement Of Common Purpose and Values

**4.** The questionnaire asked for details of subsequent action to re-enforce the SCPV and how corporate values are communicated to new and existing staff and the public. A wide variety of responses were received but many mentioned were uninspiring and of a very passive nature. In particular, various respondents stated re-enforcement consisted of the SCPV remaining framed on walls around the force or that its values are incorporated in many force publications. Some mentioned the values are implicit (rather than explicit) in all training material or all force

publications. Of the more rigorous methods of communicating the SCPV to staff, the most commonly mentioned was through some form of induction training. (See table B-2.)

Table B-2

Type of Induction Training	Number of Forces
Police induction training/probationer training	20
Support staff induction training	9
Non-specific induction training	5
Included in an induction pack to all staff	5
Specials induction training	1

5. Additionally, many forces mentioned the importance of impressing on new recruits the need to act with integrity right from the start. In order to do this, a number use a variety of methods ranging from:

- personal talk by the chief constable to each officer, either on joining and/or to those on promotion (11 forces);
- the chief constable giving an input on probationer training;
- new members receiving a copy of the SCPV;
- all members receiving their own copy of the policing plan with a letter from the chief constable;
- a personal letter to all staff from the chief constable.

6. One of the best examples for impressing the values on new recruits was provided by **West Midlands**, with each officer given a framed copy of his/her Declaration of Attestation (see annex 2). Five other forces also mentioned a copy of the values or the SCPV is handed to all new members/recruits. Some forces attempted to demonstrate the standards of values required before recruits apply e.g. **Kent** stated that, *'Literature contained within the recruiting pack outlines the philosophy of intelligence led policing and illustrates the exacting standards which applicants will need to demonstrate when being considered for appointment. A self-assessment guidance note draws on the competencies mentioned above to enable each candidate to determine whether or not they are up to the job.'*

7. Other good initiatives include:

- **Durham, Humberside** and **South Yorkshire** mentioned all officers receive an aide memoire card with the force values on.
- **City of London** have the force values printed on the back of their business cards.

8. Another more rigorous method of ensuring members of staff had a thorough knowledge of the force's values was to include this as a criterion on job descriptions (3 forces) and in appraisals (6 forces).

### Force Publications On Integrity

**9.** When asked if any specific document had been published to their forces on expectations of integrity, few forces appeared to have undertaken such an exercise. However, five respondents did state they had published an Anti-Corruption Strategy. Five forces had also published either a code of conduct for all staff or for support staff, whilst four responded that they had sent a letter to all staff on joining the force explaining their views and expectations as chief constable. In addition to this, the Chief Constable of **Humberside** also sends all sergeants a personal letter on promotion which includes these issues. Some forces went further than others in their attempts to publicise these documents to their staff. For example, **Kent** stated that, *‘The Fraud and Corruption Strategy was issued by post to the home of every member of the force, and all new entrants are given a copy as part of their joining instructions.’*

**10.** In addition to these answers, other documents mentioned included:

- a policy on hospitality – **Greater Manchester**;
- a statement on freemasonry – **Humberside**;
- posters on display giving advice on crime recording and disclosure rules – **Staffordshire**;
- a document on cutting complaints – **Thames Valley**;
- an ethics group which has promulgated a Statement of Ethical Principles – **Surrey**;
- a policy on drinking and driving – **West Midlands**;
- a register of interests for staff above particular ranks is kept and reviewed biennially by the Director of Finance and Administration – **Kent**.

### Training/Processes For Maintaining Integrity

**11.** The questionnaire asked if the concept of ‘integrity’ featured specifically in their internally run training courses. Overall, few forces responded with any specific details of how these issues are included in internal training to help maintain standards.

**12.** Eleven forces stated integrity issues were integral in all their training but gave no explanation as to how this is manifested. Most commonly, forces responded that various modules of probationer training contain inputs on integrity or values and the PEACE interview training course covers some related ethical and integrity issues. These courses are national packages, generally run at regional centres and comprise training which all officers receive. Consequently, the majority of officers will have received some input on integrity issues on these particular courses and that input will have been broadly similar across forces, however, it does not represent a specific effort on behalf of a force to reinforce its values and standards.

**13.** More interesting were the responses which described local, internally developed courses that include an input on integrity. These included: civilian staff induction courses (6 forces), tutor constable training (7 forces) and custody officer training (5 forces). Little specific information was provided on the form that the input on integrity takes. **Durham** and **Wiltshire** stated they provide some management development for both police and civilians.

**14.** Of the more detailed answers, **Kent** stated training on integrity is linked heavily into the intelligence led policing model. Specifically, courses, including those for informant handlers and controllers, intelligence operatives and managers, and for test purchase operatives, contained lectures on:

- The spiral of corruption, its symptoms, outcomes and remedies.
- The Stockholm Syndrome.
- The threat to intelligence led policing from the European Convention on Human Rights.

#### Tenure of Post

**15.** From the answers received, 35 forces have some form of tenure policy for the majority of posts but their extent varied between these forces. Six applied it to all posts apart from uniformed foot patrol, others did not include divisional CID or Traffic sections and a few only applied it to the very specialised squads.

**16.** Of the forces that operated a tenure policy, many (15 forces) indicated improving levels of integrity had not been the primary reason for its introduction, but it may be a by-product. One or two gave more forceful statements to the effect that tenure was not a method which could promote integrity.

#### Whistleblowing

**17.** In response to whether they had a 'whistleblowing' system, 15 forces said they have some form and seven were currently considering such a system. In four of the existing systems, the telephone line was specifically for fraud or corruption matters, whilst in one it was for bullying or harassment problems only. Of the 15 forces that have confidential lines, six stated the contact is direct to either the chief constable or the deputy chief and three that it goes to the complaints and discipline department. **Sussex** has both a line to a locked answering machine and a confidential line to complaints and discipline and the rest did not state where the line goes. Of the forces that did not have systems, some had considered it, but after research or consultation decided it was not necessary. (See table B-3.)

Table B-3

Response	Number of Forces
Force has a whistleblowing system of some form	15
They have no evidence to support the need for such a system	5
Their force has a suitably open culture and people are encouraged to report malpractice anyway	10
They are considering introducing one	9
No mention	4

**18.** Of the forces that stated they had a whistleblowing system, not all gave details of the frequency of use but those who did all found that the line was infrequently used, for example,

- **Durham** – three times.
- **Lancashire** – less than 12 times a year.
- **Northamptonshire** – is not used but neither has it been re-publicised.
- **West Midlands** – open since 7th July 1997 and they get less than one call a week. They have received 24 calls that have required investigation.

#### Internal Witness Protection

**19.** A question was asked about the support provided to those officers and members of support staff who blow the whistle on colleagues. From the responses to the question about witness protection schemes, few forces appear to have such schemes and where they exist they are not specifically aimed at internal witnesses. Only two forces (**Northumbria** and **West Midlands**) stated they have policies for supporting vulnerable internal witnesses but others did mention they had in the past or were currently providing such support. **Staffordshire** are already providing support to several internal witnesses and are looking to introduce a formal process. **West Midlands** also mentioned they were not satisfied they had been doing enough to support the '*morally brave officers*' and as a result have introduced procedures to put potential police witnesses into contact with a support officer.

#### What Are the Standards?

**20.** When asked about the standards expected of the Police Service, only seven forces stated the public expect a higher standard of integrity than they would of other organisations. It was mentioned by one force (**Avon and Somerset**) that the frequently quoted idea of police officers being recruited from society, and therefore reflecting it, is '*an uninspiring aspiration*'. The methods by which chief officers can impress the standards expected on their forces were asked for: leadership or leading by example as a key method of promoting these values was specifically mentioned by 11 forces and in fact two (**Avon and Somerset** and **Cumbria**) mentioned they had drawn up a leadership charter or code of conduct. Nine forces mentioned the use of the discipline code and publication of results of such cases as a prime method of communicating values and what is acceptable to officers.

#### Threshold of Acceptability

**21.** It has been suggested that within the police, there is a moving scale in relation to integrity issues. For example, at the lower end, the personal use of police stationery, using a warrant card to enter a nightclub, or accepting free meals, and at the other end serious corruption. The questionnaire asked for the views of chief officers where the threshold of acceptability lies, if it varies by virtue of rank, specialism or post and would the public agree with their comments?

**22.** The answers to these questions created a wide variety of response, with much debate about the difficulties of defining the threshold. Seven respondents felt it is impossible to define fully a threshold for integrity as there are too many examples of possible situations where guidance would be required; in many cases, it is not possible to determine what is the correct action, i.e. although it may be determined that officers should not accept hospitality, sometimes refusing

it would be to cause offence. For those who did try to define it, unacceptability was generally determined by the motivation behind the action, gift or hospitality. It was presumed if the motivation behind the action was for selfish reasons or personal gain or if it was offered in expectation of a return, it was unacceptable. However, there are limitations to the motivation rule which were illustrated by a number of respondents, such as the officer who bends the rules to achieve a conviction of someone they know to be guilty – mentioned as 'noble cause corruption'.

**23.** Thirteen respondents stated they do not support the idea of a moving scale of integrity and believe the highest standards without thresholds must be maintained by all. Of these, a number feel that to describe a threshold at all means to condone those actions which fall below the line, or that a moving scale encourages subjective judgements by officers.

**24.** The issue of whether the threshold varied by virtue of position in the force caused some divergence of opinion. Seventeen respondents felt there should be no distinction in the standards of behaviour expected of ranks, specialisms and roles, however, three respondents suggested the higher the rank the higher the expectations of integrity and the more severely lapses should be looked upon.

**25.** Respondents varied in their views of how the public see this issue. Fourteen respondents stated the public demanded a very high level of integrity of police officers, although only seven had stated the public demanded a higher standard of the police than of other organisations. Eight respondents felt the public were more realistic in their demands of standards of integrity of police officers and could recognise the difference between serious misconduct and minor infringements. Three respondents felt that, in fact, the public were often less concerned about these issues than the police themselves.

#### Use of Discounts

**26.** Some organisations, e.g. transit services, encourage police officers to use their services free of charge. Police staff associations arrange group discounts for their members. Chief officers were asked for their views on these approaches, what they thought the view of the 'paying public' would be and if any safeguards were necessary?

**27.** The majority (34) of chief constables replied that they had no fundamental objection to staff association organised discounts provided certain safeguards were in place or that particular criteria were met. The safeguards and criteria are listed in table B-4 overleaf.

**28.** In general, respondents felt that as long as the offer was being made because the police force/Service offered a large customer base like any other, then it was perfectly acceptable. **Thames Valley** stated,

*'The key question must always be: does the offer in question prejudice the impartiality or integrity of individual officers, or the force or the Service as a whole, or might it be seen to do so by members of the public.'*

It was also mentioned that *'It is small, localised and secret arrangements when problems can arise.'* Some respondents had very strong views on this issue, for example:

**Kent** responded that,

*'In my view, it is never acceptable to use the warrant card for anything other than police business. To do so is unprofessional and brings discredit upon the service.'*

The **West Midlands** were also,

*'not comfortable with the ethics of Police Staff Associations arranging group discounts, particularly as this is done by an outside organisation with motives to generate income for themselves.'*

**29.** Respondents varied in their views on how the public would view the police acceptance of discounts. A large number of respondents (17) felt these systems are widely available throughout society and the public would not be concerned or would find the arrangements entirely acceptable. In fact, three forces stated it would be unfair treatment to police officers if such discount systems were not allowed as most other workforces had some advantages of this nature arranged.

Table B-4

Safeguards & Criteria Required	Number of Forces
The discount/offer is transparent and open/auditable and documented	21
The discount is being offered by virtue of the fact that police officers are a large customer base just like any other, rather than the fact they are police officers in particular	23
The agreement does not compromise the integrity of the officers/force/Service	9
The agreement fits in with the force policy on such things	6
The discount is available to all staff, not restricted to particular groups	4
The discount is negotiated through a recognised body such as the Federation or a social club	4
The chief constable has approved the agreement	3
The police gain no special privilege that any other staff association would not receive	3

### Drinking on Duty

**30.** The answers to the question about drinking on duty showed a wide variation in chief constables' views, from the fairly liberal to the extremely strict. Some viewed it as an area where strict guidelines are necessary and others that it is more the responsibility of the individual to act appropriately according to the situation.

**31.** The majority (26 forces) stated alcohol is never served at working lunches and 25 respondents that drinking alcohol whilst on duty is not acceptable or at least not condoned. Three forces (**Durham, Humberside and Lincolnshire**) gave more strict answers saying that drinking alcohol on duty was totally unacceptable and one (**Cumbria**) that drinking on duty was actively discouraged. Six forces made mention that it was force policy not to drink on duty. This may well be the case in many other forces but it was not stated in the questionnaire reply.

**32.** One force (**Norfolk**) responded with an example,

*'There is never any alcohol served at functions held in my own office – even when I host a small Christmas reception for Staff Associations, Senior Officers and Police Authority.'*

This last statement can be compared with the more relaxed attitudes of other respondents. For example, one chief constable felt that,

*'In certain circumstances, given clear guidelines, taking drink in moderation on or off duty does not, in my mind, infer a lack of integrity.'*

Six respondents (**Cambridgeshire, Devon and Cornwall, Nottinghamshire, South Wales, South Yorkshire and Thames Valley**) felt that on some occasions it could be appropriate to drink during working hours. Most of these gave examples of circumstances where it may be appropriate, including when officers are on covert operations in licensed premises and at social occasions representing the force.

**33.** That attitudes to alcohol are the decision of the individual is suggested by some respondents, including one that answered,

*'I am not in favour of the consumption of alcohol during meal breaks or at working lunches' however this 'is a personal view [and it] matters not how others perceive it.'*

This view was reiterated by another who felt that whether they drink or not it is the responsibility of the individual. Two forces (**Cambridgeshire and Dorset**) felt a complete prohibition is not the answer as it is unrealistic and unenforceable, particularly in relation to plain clothes officers and support staff.

**34.** It was recognised by many respondents that in the past drinking on duty was, if not condoned, then part of the police culture. However, nine respondents felt the culture had changed and drinking on duty was no longer seen as acceptable and this is partly a reflection of

a change in culture in the general population. It was felt the public had become more health conscious and concerned about value for money so no longer expected alcohol at working lunches. As evidence of their attitudes to alcohol and the changes in police culture, many examples were cited. Six respondents stated police bars have either been closed down or are not open to serve alcohol during the day.

#### Causes of Lapses of Integrity

**35.** Chief officers were asked what in their view are the causes of any lack of integrity within the police that the Service can and should address? The main causes described are shown in table B-5.

Table B-5

Causes for Lapses in Integrity	Number of Forces
Lack of or poor supervision/acquiescence of supervisors	11
The performance culture and the need to achieve results	10
Lack of good leadership/good examples	9
Temptations from major criminals	7
Lack of personal honesty/values	6
Poor recruiting/selection processes	5
Not making clear what is and is not acceptable behaviour	5
Not dealing seriously with minor breaches of the disciplinary code	5
The belief that nothing will happen	4
Changes to the base salary scales	3
The fact that the Police Service mirrors society	3
Greed	3
A general lowering of professional standards	3
A misguided sense of loyalty to colleagues	3

**36.** The main theme of the responses was that the supervision at middle management level and the leadership from the top were vitally important. Some of the other frequently cited reasons, for example not making clear what is acceptable and not dealing seriously with minor breaches of integrity, have these issues at their root. The main solutions suggested to reduce lapses in integrity were as shown in table B-6.

Table B-6

Solutions	Number of Forces
Standards expected of staff spelt out clearly from the start	11
Better leadership	9
Thorough selection/vetting procedures/thorough vetting for specialist units	10
Serious transgressions dealt with severely	3
More open and honest service to encourage reporting of malpractice	3

#### The Extent of Corruption

**37.** Chief officers were asked to describe the extent of corruption amongst their staff. Their responses ranged from those who considered there was a certain amount of corruption in their force which they were dealing with (3 forces) to those who did not consider there was any corruption in their forces (3 forces). Many respondents (27 forces) stated the level of corruption in force was either:

- very low;
- due to isolated individuals or incidents; or
- they had no evidence to suggest it was widespread.

**38.** The forces that answered in this way ranged from small rural forces to the large urban ones. Some forces obviously felt they were exempt from any such problems because they were so small.

**39.** The evidence for the assertions of the low level of corruption in forces was fairly minimal but some quoted complaints and discipline figures. Eight forces did state, however, they did not know the true extent of corruption or that it was very difficult to quantify.

#### Any Other Issues

**40.** Chief officers were asked to identify any particular weak spots in any aspects of policing within the Service that should be examined during this Inspection.

**41.** The main areas of concern listed included those listed in table B-7.

**42.** Five forces identified the performance culture as a possible cause of concern. They describe how the pressure to perform can create tensions that lead to a distortion of the crime and other performance figures. One force stated the likely increasing pressure on police funding over the coming years could *'create significant tensions including the temptation to lessen quality and ethical standards to achieve targets.'*

Table B-7

Weak Aspects of Policing in Relation to Integrity	Number of Forces
The management of informant handlers and informant handling	9
The temptations placed on officers in vulnerable posts by major criminals/organised crime/drug dealers	5
The pressures of the performance culture	5
The handling of drugs	4
The introduction of the National Crime Squad	3
Supervisor training	2
Licensing	2
The culture of small specialist squads	2
The level of officers' personal debts	2
Crime recording practices	2
The inadequacy of the current discipline regulations	2
The need to define what is and is not acceptable behaviour	2

**43.** Other issues that featured high in forces' concerns were those relating to officers dealing with major criminals and organised crime, such as the large temptations offered by major drug dealers, and the difficulties that inexperienced officers can find themselves in. In addition, the problems inherent in handling informants and managing the handlers were mentioned.

**44.** Finally, the questionnaire provided an opportunity for chief officers to give any other thoughts or comments on the subject of integrity. This resulted in a few interesting comments, notably the suggestion the police force was part of a criminal justice system but they were the only part of that system being scrutinised for integrity; the standards and values that apply to the police should apply to all parts of the criminal justice system and to the other agencies with which the police have to form partnerships under the Crime and Disorder Act.

## Annex 1

### Statement of Common Purpose and Values

The purpose of the Police Service is to uphold the law fairly and firmly; to prevent crime; to pursue and bring to justice those who break the law; and to keep the Queen's Peace; to protect, help and reassure the community; and to be seen to do all this with integrity, common sense and sound judgement.

We must be compassionate, courteous and patient, acting without fear or favour or prejudice to the rights of others. We need to be professional, calm and restrained in the face of violence and apply only that force which is necessary to accomplish our lawful duty.

We must strive to reduce the fears of the public and, so far as we can, to reflect their priorities in the action we take. We must respond to well founded criticism with a willingness to change.

## Annex 2

### Form of Declaration of Attestation on Appointment

I, ... .. of ... .. do solemnly and sincerely declare and affirm that I will well and truly serve Our Sovereign Lady the Queen in the office of constable, without favour or affection, malice or ill will; and that I will to the best of my power cause the peace to be kept and preserved, and prevent all offences against the persons and properties of Her Majesty's subjects; and that while I continue to hold the said office I will to the best of my skill and knowledge discharge all the duties thereof faithfully according to law.

## Appendix C

### Analysis of Police Suspensions, Convictions, etc

1. As part of the Inspection, a questionnaire was sent to the 44 forces of England, Wales and Northern Ireland. This asked details about suspended officers as at 31.12.98, officers who were convicted of a criminal offence during 1998, and officers who retired or resigned whilst under investigation during 1998. The findings have been summarised below.
2. As at 31.12.98, 41 forces had at least one officer suspended; a total of 331 officers across the country (see table C-1).
3. In 1998, 39 forces had at least one officer convicted of a criminal offence; a total of 216 officers across the country (see table C-2).
4. The higher numbers of suspended and convicted officers not surprisingly relate to the larger forces, e.g. **Metropolitan Police, Merseyside** and **S. Yorkshire** had 21, 16 and 12 suspended officers respectively. As a proportion of strength the position is very different; those forces policing the largest conurbations are spread fairly evenly with, for example, the **Metropolitan Police** being only fourth for suspensions and eighth for convictions, and some of the smallest and rural forces having higher percentages. Snapshots do not necessarily show the true position over time; **Kent** having the lowest proportional suspensions at 31.12.98 but seventh highest in convictions in 1998 perhaps demonstrates this. It will also be seen that **Avon and Somerset, Cleveland, Essex, Greater Manchester, Humberside, Norfolk, North Yorkshire, Northumbria, South Wales, Sussex and West Midlands**, a very mixed group, all had at least seven suspended officers; and **Cumbria, Essex, Greater Manchester, Hampshire, Kent, Merseyside, South Yorkshire, Staffordshire, Thames Valley and West Midlands** all had four or more officers convicted of criminal offences.
5. Of the 44 forces, 34 had officers who retired or resigned whilst under investigation in 1998 (see table C-3). In total, 140 officers retired or resigned whilst under investigation; 99 of these resigned, 33 medically retired and 10 took normal retirement. The allegations at the time were notably varied although neglect of duty and various assaults featured strongly. The pattern of forces is very different under this criterion because each is at a different stage in tackling this issue. In percentage terms, three of the smallest forces, **Northamptonshire, Cumbria and Gwent**, are in the top four and some of the largest, **Merseyside, Greater Manchester, West and South Yorkshire**, are well down the table.
6. When the rank of offending officers is considered, numerically constables make up the vast majority: 83.4% of those suspended, 95.8% of those convicted and 93.6% of those retired/resigned under investigation. As a proportion, however, constables are 78.0% of the Police Service.
7. There were, however, 11 officers of superintendent rank included in the three categories. This represents 2.1%, 0.9% and 1.4% respectively, compared with their proportion of the Service of 1.2%. Their details are as follows:

- 1 **Gwent** superintendent suspended for allegedly obtaining monies by deception
- 1 **Cleveland** superintendent suspended for allegations including trading drugs for information
- 1 **North Yorkshire** superintendent suspended on discipline charges of disobedience to orders
- 1 **Northamptonshire** superintendent suspended for alleged neglect of duty and falsehood
- 1 **South Wales** superintendent suspended for alleged theft and attempting to pervert the cause of justice
- 1 **Sussex** superintendent suspended for alleged misfeasance in a matter relating to a fatal shooting by a police officer
- 1 **Greater Manchester** chief superintendent convicted for drink-driving (18 months disqualification, fines, costs)
- 1 **West Midlands** chief superintendent convicted for theft (2 years imprisonment)
- 1 **Northamptonshire** superintendent resigned over neglect of duty and falsehood
- 1 **West Midlands** superintendent retired over neglect of duty.

**8.** In addition, the Chief Constable of **Gwent** was suspended for alleged improper practices. (In 1998, the public were concerned about the conduct of a few chief officers and the position has worsened in 1999.)

#### Suspensions

**9.** As one can see from table C-4, of the multitude of reasons given for those suspended, theft, corruption, dishonesty and deception were by far the most common, making up a third of the national total (112 suspensions). Assault allegations were also prevalent with nearly 60 officers suspended for such an offence. Particularly of concern, there were also 34 suspensions on grounds of indecency, including several rape allegations.

**10.** These three broad categories of suspension reasons were represented fairly evenly across the forces. Other reasons were more force specific:

- **Humberside:** 5 officers suspended for a death in police custody (out of 6 nation-wide)
- **Cleveland:** 8 officers suspended for trading drugs for information (out of 15 nation-wide drug related offences)
- **Essex:** 4 officers suspended for the infamous dog-kicking offences (no other cruelty to animal cases nation-wide)
- **South Yorkshire:** 11 officers suspended in relation to the firearms compensation scheme (no other cases nation-wide)
- **Merseyside:** 8 officers suspended for attempting to pervert the course of justice (out of 26 nation-wide – although several multiple reasoned suspensions included perverting course of justice).

**11.** In the current socio-political climate, it is also interesting to see that there were only four cases of suspensions for racial discrimination or harassment.

#### Convictions

**12.** The majority of officers were convicted for either assaults, thefts or driving offences, with a large number (34) for drink-driving, which usually carried at least a 12-month disqualification, fines and costs. Imprisonment resulted in several of the cases, particularly those involving theft, indecent assault and deception. Some of the longest sentences given were:

- 1 **Merseyside** PC: 9 years for rape
- 1 **Merseyside** Chief Inspector: 5 years for corruption
- 1 **Humberside** PC: 5 years for buggery and indecent assault
- 1 **Kent** PC: 2 years (in total) for a variety of offences including assaults of GBH and ABH
- 1 **Bedfordshire** PS: 2 years (1 suspended) for indecent assault
- 1 **Cheshire** PC: 2 years for indecent assault
- 1 **Lancashire** PC: 15 months for deception.

**13.** Various other shorter sentences, probation periods and community service orders were common for assaults, thefts and some of the more serious driving offences.

#### In Perspective

**14.** It should be noted that as a proportion of the police strength, the suspensions amount to 0.24%, the convictions to 0.16% and the resignations or retirements during investigation to 0.10%.

Table C-1: Suspended Officers as at 31.12.98

Force	Police Strength as at 31.3.98	Suspended Officers as at 31.12.98	%
Kent	3251	0	0.00
Suffolk	1186	0	0.00
West Mercia	2010	0	0.00
Devon and Cornwall	2962	1	0.03
Derbyshire	1772	1	0.06
Hampshire	3490	2	0.06
Dorset	1310	1	0.08
West Yorkshire	5155	4	0.08
Notts	2320	2	0.09
Gloucestershire	1104	1	0.09
Cheshire	2042	2	0.10
Thames Valley	3776	4	0.11
Hertfordshire	1740	2	0.11
Surrey	1608	2	0.12
GMP	6949	9	0.13
Gwent	1233	2	0.16
West Midlands	7156	12	0.17
Lincolnshire	1191	2	0.17
Wiltshire	1156	2	0.17
Lancashire	3257	6	0.18
Northumbria	3769	7	0.19
RUC	11478	23	0.20
Staffordshire	2292	5	0.22
Avon and Somerset	2976	7	0.24
Essex	2928	7	0.24
Cumbria	1164	3	0.26
Durham	1515	4	0.26
North Wales	1396	4	0.29
Sussex	3038	9	0.30
Dyfed-Powys	1002	3	0.30
Leicestershire	1983	6	0.30
Warwickshire	924	3	0.32
South Wales	2986	10	0.33
City of London	825	3	0.36
Metropolitan	26094	97	0.37
Cambridgeshire	1291	5	0.39
Northants	1169	5	0.43
Humberside	2021	9	0.45
Bedfordshire	1079	5	0.46
Norfolk	1430	7	0.49
Merseyside	4216	21	0.50
South Yorkshire	3182	16	0.50
North Yorkshire	1367	7	0.51
Cleveland	1483	10	0.67

Table C-2: Officers Convicted of a Criminal Offence During 1998

Force	Police Strength as at 31.3.98	Officers convicted of a criminal offence during 1998	%
Cambridgeshire	1291	0	0.00
Dyfed-Powys	1002	0	0.00
Lincolnshire	1191	0	0.00
Northants	1169	0	0.00
Wiltshire	1156	0	0.00
Sussex	3038	1	0.03
Avon and Somerset	2976	1	0.03
Devon and Cornwall	2962	1	0.03
West Mercia	2010	1	0.05
West Yorkshire	5155	3	0.06
Surrey	1608	1	0.06
Durham	1515	1	0.07
South Wales	2986	2	0.07
Cleveland	1483	1	0.07
Norfolk	1430	1	0.07
Dorset	1310	1	0.08
Northumbria	3769	3	0.08
Gwent	1233	1	0.08
Lancashire	3257	3	0.09
Cheshire	2042	2	0.10
Humberside	2021	2	0.10
Notts	2320	3	0.13
GMP	6949	9	0.13
Hampshire	3490	5	0.14
North Wales	1396	2	0.14
North Yorkshire	1367	2	0.15
Leicestershire	1983	3	0.15
South Yorkshire	3182	5	0.16
Thames Valley	3776	6	0.16
Merseyside	4216	7	0.17
Derbyshire	1772	3	0.17
Essex	2928	5	0.17
Hertfordshire	1740	3	0.17
Staffordshire	2292	4	0.17
Gloucestershire	1104	2	0.18
West Midlands	7156	13	0.18
Warwickshire	924	2	0.22
Kent	3251	8	0.25
Metropolitan	26094	66	0.25
Suffolk	1186	3	0.25
RUC	11478	30	0.26
Bedfordshire	1079	3	0.28
Cumbria	1164	4	0.34
City of London	825	3	0.36

Table C-3: Resignations and retirements while under investigation during 1998

Force	Police Strength as at 31.3.98	Total Resignations, Retirements and Medical Retirements	%
City of London	825	0	0.00
Cleveland	1483	0	0.00
Durham	1515	0	0.00
Lancashire	3257	0	0.00
Lincolnshire	1191	0	0.00
Merseyside	4216	0	0.00
North Wales	1396	0	0.00
Staffordshire	2292	0	0.00
Surrey	1608	0	0.00
Wiltshire	1156	0	0.00
South Wales	2986	1	0.03
Avon and Somerset	2976	1	0.03
GMP	6949	3	0.04
Cheshire	2042	1	0.05
Humberside	2021	1	0.05
Northumbria	3769	2	0.05
West Yorkshire	5155	3	0.06
South Yorkshire	3182	2	0.06
Norfolk	1430	1	0.07
Dorset	1310	1	0.08
Cambridgeshire	1291	1	0.08
Thames Valley	3776	3	0.08
Hampshire	3490	3	0.09
RUC	11478	10	0.09
Leicestershire	1983	2	0.10
Essex	2928	3	0.10
Warwickshire	924	1	0.11
Derbyshire	1772	2	0.11
Metropolitan	26094	30	0.11
Notts	2320	3	0.13
Devon and Cornwall	2962	4	0.14
Kent	3251	5	0.15
Suffolk	1186	2	0.17
Hertfordshire	1740	3	0.17
Gloucestershire	1104	2	0.18
Bedfordshire	1079	2	0.19
West Mercia	2010	4	0.20
Dyfed-Powys	1002	2	0.20
North Yorkshire	1367	3	0.22
West Midlands	7156	17	0.24
Gwent	1233	3	0.24
Cumbria	1164	3	0.26
Sussex	3038	11	0.36
Northants	1169	5	0.43

Table C-4: Reasons for the Suspension of Officers as at 31st December 1998 (by Force)

Force	Dishonesty/Perjury/Deception + Theft/Fraud + Corruption/Forgery/Bribery + Possession	Indecency/Indecent Assault/Rape	Integrity of Investigation	Assault/ Excessive Use of Force/Alfray	Bigamy	Improper Practice	Pervert Course of Justice	Sexual Harassment	Undisclosed Business	Death in Police Custody	Murder Investigation	Neglect of Duty/Misfeasance/Unfit for Duty	Disobedience to Orders/Disciplinary	Drug-related Offences – eg Supply, Possession	Driving Offence including Drink-Driving	Unlawful Disclosure of Information	Obscene/Malicious Phonocalls	Neglect of Health	Cruelty to Animals	Death by Dangerous Driving	Racial	Firearms Compensation Scheme	Arson	Criminal Damage	
Avon and Somerset	6	1																							
Bedfordshire			5																						
Cambridgeshire				2								1											2		
Cheshire				1								1													
City	2			1																					
Cleveland														8		1					1				
Cumbria	3																								
Derbyshire																								1	
Devon and Cornwall				1																					
Dorset																1									
Durham	4																								
Dyfed-Powys	1			1								1													
Essex	2															1			4						
Gloucestershire				1																					
GMP	6						3																		
Gwent	1					1																			
Hampshire	1	1																							
Hertfordshire	1			2																					
Humberside	1						1	1	5						1										
Kent																									
Lancashire	1	2		2											1										
Leicestershire	2	1		2			1																		
Lincolnshire				2																					
Merseyside	1	2		4			8	2					1	1	1									1	
Metropolitan	50	9		16			5	1				3	3	3	1	1					2		3		
Norfolk	2	2								1	1	1													
North Wales	2			1													1								
North Yorkshire				1			4						1		1										
Northants	1	1		2				2				1													
Northumbria				3																1					
Notts	2																								
RUC	8	4		4			3						1	1										1	
South Wales	4	1		1	1				1			1									1				
South Yorkshire	1	1		2																		11			
Staffordshire				1				2						1	1										
Suffolk																									
Surrey		1													1										
Sussex		2		2								4								1					
Thames Valley																1	2	1							
Warwickshire				2											1										
West Mercia																									
West Midlands	3	2		5			2																		
West Yorkshire	3													1											
Wiltshire	2																								
Total	110	33	5	57	1	1	26	5	5	6	1	13	2	15	10	6	4	1	4	2	4	11	5	3	330

NB In cases where multiple reasons have been given for suspension, the most serious offence has been recorded for statistical clarity.

## Appendix D

### Good Practice Guide

**1.1** This guide is intended to be a check list to assist police managers at all levels to improve the integrity of their organisation.

#### THE EFFECTS OF BEHAVIOUR ON PUBLIC CONFIDENCE

**2.1** Are there action plans to eliminate activity such as arrogance, abuse of office, bullying and harassment?

**2.2** Do all staff realise the importance of displaying simple good manners and treating all people with dignity and respect?

**2.3** Is there a culture whereby instances of bad behaviour are challenged at once and reported specifically in staff appraisals?

#### PERCEPTIONS OF THE PUBLIC

**3.1** Is there a positive programme to ensure all staff understand the varied social needs and expectations of different sectors of society?

**3.2** Has every effort been made to maximise high visibility policing?

**3.3** Are incivility complaints analysed to see what lessons should be learnt?

**3.4** Are there clear guidelines to officers regarding stop and search on the street?

**3.5** If so, are they clearly understood and actually followed by patrol officers?

**3.6** Is an imagination and commitment to help young people reflected more widely in officers' day-to-day contact with them?

**3.7** Is every effort made to raise the status of community beat officers?

**3.8** Do requests to use community beat officers for other work, thereby removing them from their beat, have to be approved by their senior officer?

**3.9** Have the recommendations on community policing contained in the recent HMIC thematic inspection report *Winning the Race (Revisited) - Policing Plural Communities* been implemented?

**3.10** Have all staff undergone training in community and race relations?

**3.11** Have links been developed with gay and lesbian groups?

**3.12** Are victims of crime regularly updated about the progress of their case?

**3.13** Are there formal close links with local victim support volunteers and are they welcome in police stations?

**3.14** Is there an open and professional relationship with the media?

#### INVESTIGATION AND PROSECUTION OF OFFENDERS

**4.1** Has action been taken to ensure there is not an unhealthy performance culture around probationer training, whereby they are put under pressure to soft target ‘the public’ in order to ‘gain their spurs’?

**4.2** Have all unethical crime recording practices been eradicated?

**4.3** Are high volume crimes being unnecessarily pursued at the expense of proper investigation of more serious crime?

**4.4** Are senior detectives assisting local crime managers and their divisional commanders by monitoring the quality of crime recording and investigation?

**4.5** Is there a system for the chief officer team to be advised by the head of the CID of any inconsistencies or bad practice in crime recording and investigation, and particularly major crime investigation?

**4.6** Are all crimes in all locations, reported by a member of the public, properly recorded and reflected in the overall crime figures?

**4.7** Is the standard applied for crimes detected upon the authorisation of a senior police officer only attributed to a particular perpetrator whose involvement is provable by evidence which, if given in court, would be likely to result in a conviction, commonly including at least an unprompted admission containing accurate features of the crime that only the perpetrator would have known?

**4.8** Whilst embracing the concept of best value, is the ‘service’ side of policing, for example child protection and community and schools liaison work, still afforded a high priority?

**4.9** Are chief officers continuing to expose areas within the criminal justice system which investigating officers and victims feel should be improved?

**4.10** Are chief officers doing all they can to ensure their staff are aware of the leadership being given, and the steps being taken to support them in their work?

**4.11** Are those officers who recruit and handle informants reassured they will be fully supported and valued in their difficult work?

**4.12** Is an adequate risk assessment carried out to ensure major criminals are not recruiting themselves as informants to obtain an ‘insurance policy’ for when they are arrested?

- 4.13** Is regard given to the experience of the handler in cases where major criminals are informants to ensure they do not find themselves 'out of their depth'?
- 4.14** Do the same methods of authorisation and auditing as would be applied to a cash payment also apply to any benefits received by an informant?
- 4.15** Is there clarity about when a person giving information comes within the definition of being an 'informant' and therefore should be registered?
- 4.16** Is there a 'confidential source' system in place?
- 4.17** If so, is this carefully controlled to ensure it is not used as a 'backdoor' method of avoiding stringent control systems?
- 4.18** Are informant controllers restricted to no more than 25 active informants?
- 4.19** Is there a system for ensuring every informant has been personally seen by the controller and his or her identity verified, as well as a first hand assessment by the controller of the informant's value?
- 4.20** Is the value/activity of each informant regularly reviewed to keep the number of unproductive informants to a minimum?
- 4.21** Are controllers and handlers supported by an IT system such as PIMS?
- 4.22** Is there a streamlined system to expedite payments and are there ways of paying an informant other than by using cash?
- 4.23** Is there a system for ensuring the informant actually signed the receipt for payment, such as a space for an impression of a rolled forefinger to be obtained at the time of payment?
- 4.24** Is National Police Training devising, as a matter of urgency, courses for informant handlers and controllers based upon the new manual of guidance?
- 4.25** Is there a system for the use of overseers, or officers independent of an investigation or department to which the informant relates, randomly to inspect the integrity of the use of informants?
- 4.26** Has the introduction of a dedicated source unit to handle informants been considered?
- 4.27** Is there a tenure policy whereby an informant can only be handled by the same individual for a maximum period?
- 4.28** Is there enough representation at the highest levels of the Police Service of officers who are experienced in major crime investigation?

**4.29** Has full use been made of training and succession planning to ensure there is at all times a pool of senior investigators (SIOs) who are of proven integrity and well trained and experienced in major crime investigation?

**4.30** Are crime scene managers encouraged to challenge decisions by SIOs which could lead to a lack of integrity, and through the scientific support manager have they, in exceptional circumstances, a direct operational reporting line to a chief officer?

**4.31** Have the new codes of practice and accompanying manuals of guidance on covert policing techniques been adopted?

**4.32** Is there a mechanism to become aware of the assessment of judges, magistrates and crown prosecutors about the general level of integrity of the officers and the quality of evidence they give?

**4.33** Do supervisory officers occasionally monitor the quality and integrity of the evidence given by their officers in court?

#### PERSONNEL AND TRAINING

**5.1** Have ways to improve initial recruitment vetting and refereeing procedures been examined?

**5.2** Does integrity feature as a major theme in the training of tutor constables?

**5.3** Does the subject of integrity stand in its own right within training and is it discussed and taught, particularly at certain key stages such as new sergeant, CID foundation, and custody officer training?

**5.4** Is there a system of continuous professional development to allow much more regular intervention and support for officers, particularly those with 15 to 30 years' service?

**5.5** Is the value of trainers recognised as agents of change?

**5.6** Is there a tenure policy for trainers to ensure they are regularly exposed to operational policing?

**5.7** Is the traditional checking of previous convictions at the recruiting stage extended to any occasion when the applicant was proceeded against or even investigated?

**5.8** Is there a system of financial and lifestyle vetting of an applicant, together with their spouse or partner?

**5.9** Has consideration been given to the reintroduction of home visits and drugs testing at initial application?

**5.10** Is there a proper check on the veracity of referees and educational qualifications, including production of the actual certificates?

- 5.11** Has an extra layer of vetting been considered similar to the Kent model for all staff in high risk posts?
- 5.12** Do the risk factors apply equally to civilian support staff and special constables, and is guidance training and wider support available to them?
- 5.13** Are police officers and support staff trained together?
- 5.14** Has a structured objective annual staff appraisal, supported by agreed job profiles and core competencies, been developed?
- 5.15** Can supervisors be confident that in practising firm management they will be supported by senior colleagues further up the command line?
- 5.16** Is there a regular turnover of officers in high risk posts, such as drug squad, crime squad, etc?
- 5.17** Is there a fair and transparent selection procedure for these posts?
- 5.18** Do supervisors understand, and are they confident in handling, a grievance?
- 5.19** Does the chief officer, personally and regularly, dip sample the confidence his or her service deliverers have in the grievance procedure?

#### THE INTEGRITY OF INFORMATION

- 6.1** Is there a *presumption* the security of information held within the force is under attack?
- 6.2** Is the chief officer moving the force towards a greater acceptance of a 'need to know' culture?
- 6.3** Is there a 'clear desk' policy, and if so, have officers been provided with convenient secure storage?
- 6.4** Can a screen print on the force intelligence system be obtained without it being recorded in the audit trail?
- 6.5** Is there automatic timeout locking on all workstations?
- 6.6** Are integrity checks and data auditing carried out on a regular basis, and if so have enough staff been provided for this function?
- 6.7** Is maximum use made of technology to protect information?
- 6.8** Is the Police Information Technology Organisation regularly updating forces about which state of the art systems are available for the protection of information?

**6.9** Has a chief officer been given the role of Force Director of Intelligence?

**6.10** Is there an awareness of who else has access to intelligence databases, for example private maintenance companies?

**6.11** Has a culture been created whereby the unauthorised leakage of information to the press is considered to be corrupt practice and immediately challenged?

#### GIFTS, GRATUITIES AND DISCOUNTS

**7.1** Are staff aware exactly what is acceptable in terms of gifts, gratuities and discounts?

**7.2** Does the force audit carefully what group discounts are currently being offered?

**7.3** If group discounts are offered, has it been explained to staff the difference between such schemes and private, less transparent, personal arrangements?

**7.4** Is the force aware of any nightclubs that arrange 'emergency services only' nights?

**7.5** If staff are attending such events, has any effect on integrity or the potential for compromising local operational officers been considered?

**7.6** Does the force have any arrangements with public transport organisations which allow their staff free travel?

**7.7** If so, have the implications for public confidence and staff integrity been taken into account?

**7.8** Has the ACPO published guidelines in respect of gifts and gratuities?

#### THE ADMINISTRATION OF FINANCE

**8.1** Have individuals been instructed on what their responsibilities are and the role they perform in checking documents such as overtime and expenses claim forms?

**8.2** Does the finance department have good systems to guard against deception, fraud and theft?

**8.3** Are the regulations concerning claims being interpreted in the same way by all staff?

**8.4** Is the Police Service together with the Home Office undertaking a review of the regulations concerning expenses and allowances?

**8.5** Are support staff responsible for processing claims encouraged to challenge those with which they are not comfortable?

**8.6** Are they provided with specimen signature lists of those supervisors and managers who can authorise expense claims?

**8.7** If the force makes use of sponsorship, has consideration been given to any impact on public perception and the integrity of their staff?

#### MONITORING AND MAINTAINING INTEGRITY

**9.1** Is there a professional standards committee, chaired by a chief officer, with members drawn from a wide range of disciplines?

**9.2** Do welfare officers and psychologists have a forum within which they can contribute to the maintenance of integrity?

**9.3** Are complaint and civil actions data effectively used as a management tool?

**9.4** Is the complaints and discipline department fully used to maintain integrity and high standards?

**9.5** Is there a system, such as a complaints and discipline newsletter, by which staff can be made aware of common causes of complaint and advised how they can be avoided?

**9.6** Is it normal practice to publish in Force Weekly Orders the fact that an officer has been dismissed or disciplined and to detail the brief circumstances of the case?

**9.7** Does the force have any form of confidential reporting line?

**9.8** Are internal witnesses who report wrongdoing by colleagues fully supported, and if so are staff aware of the support mechanisms?

**9.9** Is there a genuine desire by the chief officers to find out what is really going on in their force?

**9.10** Does a productive relationship exist between senior management and the staff associations?

**9.11** Is there a proactive team within the force for the investigation of corruption and/or the maintenance of integrity?

**9.12** If so, does the proactive team have the chief officer's full and committed support?

**9.13** Is there, within the force, a central repository for suspicions about corrupt officers or those who may lack integrity?

**9.14** Has action been taken to ensure an air of complacency does not prevail, in terms of the potential for corruption to flourish?

**9.15** If integrity testing or proactive work to maintain integrity is employed, is it doing so sensitively and carefully to ensure morale amongst honest staff is not lowered?

## LEADERSHIP AND MANAGEMENT

**10.1** Is the Police Service taking steps to develop a more active leadership style, perhaps best described as ‘intrusive supervision’, at all levels?

**10.2** Do chief officers ensure any statements by them about ‘firm leadership’ are translated into support for their middle managers?

**10.3** Is there an over-reliance on officers ‘acting up’?

**10.4** Are acting supervisors formally selected and given some form of training, including the recognition of failings in integrity and what to do about it?

**10.5** Have selection criteria for promotion been re-examined to ensure greater emphasis is given to the ability to demonstrate robust leadership and the motivation to challenge unprofessional behaviour?

**10.6** Does the chief officer have checking mechanisms to ensure the force ethical vision is delivered throughout the organisation?

**10.7** Are ethical vision statements regularly updated and actively re-enforced?

**10.8** Has the Home Office re-examined the wording of the Declaration of Attestation as set out in Schedule 4 of the Police Act 1996?

**10.9** Do chief officers ensure they are visible and accessible, such as through regular visits to the workplace?

**10.10** Has the introduction of a minimum period for a posting for senior officers been considered?

**10.11** Does the chief officer team recognise the importance of clearly setting the standards and being seen to practice what they preach?

## THE SUPPORT OF POLICE AUTHORITIES AND HMIC

**11.1** Are police authorities provided with the means and information to become aware of the state of health of their force, including the ability to view all complaints files?

**11.2** Is there a professional and mutually respectful partnership between the police authority and the chief constable?

**11.3** Do Her Majesty’s Inspectors increasingly monitor integrity and the systems for maintaining it?

**11.4** Have forces ensured their staff are continually aware that, if they consider a grievance or complaint is not being progressed correctly, they can contact their regional HMI direct?

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