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6th December 2011

Denis Davis

POLICE INTEGRITY REVIEW

Thank you for your letter of 21 November enclosing HMIC's draft report on police integrity. This review is timely and important.

Naturally I very much welcome your finding that corruption is not endemic in British policing. That is a prize we must celebrate and sustain at all costs. It is essential to our model of policing by consent, and to public trust and confidence in the service at all levels. More generally, however, your report presents an urgent wake up call for police leaders. You find some good practice. But it is clear that on a whole range of integrity issues where real or perceived conflicts of interest may arise, and significant reputational damage may be caused, standards and processes are often weak and inconsistent at present. I am equally concerned by your view that police leaders are insufficiently compelling about the importance of this issue, and the values which should underpin the day-to-day business of policing; and that the most senior officers do not always lead by example.

I accept your proposed recommendations as valuable steps towards addressing these concerns. The Home Office will be more than happy to encourage debate and progress, as you request. But I would like to suggest that you strengthen them in two key ways.

First, I would want to see greater pace and urgency from the service in developing more robust and consistent arrangements. It would be helpful therefore if you could say more explicitly that you expect the service to have detailed proposals ready for consultation with all relevant parties by (I suggest) April next year. That timetable

would allow the service to take account of the findings from Elizabeth Filkin's work with the MPS in the next few weeks, and the IPCC's full report on corruption due early next year.

Second, the recommendation relating to the strategic command course is welcome, but might be seen as implying that these issues are a priority for the next generation of leaders rather than this one. I would like to see a more direct challenge to current police leaders that dealing with these findings is their personal responsibility, individually as well as collectively. The draft report contains an excellent statement on pages 57-58, which I would welcome being elevated to a fifth formal recommendation to address this. Your proposed reassessment next autumn will then provide a further helpful push for incoming Police and Crime Commissioners, Police and Crime Panels and the service alike.

Finally, the draft report refers at various points to the benchmarking exercise you have conducted, comparing the police service's approach to integrity issues with those of other bodies. These matters are of course a challenge for all organisations and cultures, and the report illustrates well the new questions for everyone surfaced by the developments in social media. But I have some reservations about the way in which the lessons from this unpublished work are presented, particularly on pages 19, 56 and 63. You will recognise that it is not ultimately for HMIC, as the independent regulator of the police service, to offer judgements on the integrity of other bodies. More important, such remarks could encourage an unfounded complacency in some parts of the service; and present some risk that the debate following publication of your report is drawn towards the other organisations you have looked at rather than policing itself. I would therefore invite you to consider further how the various references to this exercise might best support the key messages of the report.

My officials have already been in touch with a few smaller drafting suggestions. Subject to your considering these, and the points I have made here, I am content for you to publish the review at an agreed date in the near future. I will publish a written Ministerial statement and a press notice at the same time, welcoming the report and emphasising the importance I attach to addressing its findings. They will provide very useful evidence for Lord Justice Leveson's inquiry; but they will also be highly relevant to our own continuing discussions on police leadership and culture, both in the context of Tom Winsor's work and the development of the police professional body.

Thank you again for this important contribution to safeguarding and strengthening the British model of policing.



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