



**ORIGINATOR: CHIEF CONSTABLE**

**PAPER NO. AP13/15**

**SUBMITTED TO: ACCOUNTABILITY AND PERFORMANCE PANEL –  
30 APRIL 2013**

**SUBJECT: POLICE RELATIONSHIPS (INTEGRITY INSPECTION) –  
UPDATE ON PROGRESS WITH HMIC RECOMMENDATIONS**

**SUMMARY:**

1. In August/September 2011, HMIC conducted an inspection of the Force in respect of 'Integrity'. The inspection was part of a national process which arose from the national debate concerning 'phone hacking'.
2. In August 2012 HMIC re-visited the Force to track progress, and this report outlines the actions taken and the progress made against key recommendations.

**RECOMMENDATION:**

1. The Accountability and Performance Panel is asked to consider the progress made to date and comment on the action taken to underpin integrity issues in the Force.

## 1. KEY ISSUES FOR CONSIDERATION:

- 1.1 In August/September 2011 Suffolk Constabulary was subject of an HMIC Inspection as part of a national inspection into Integrity. The inspection arose from a statement by the Home Secretary in July 2011, following the 'phone hacking' scandal and required HMIC to look into the "*undue influence, inappropriate contractual arrangements and other abuses of power in police relationships with the media and other parties*"
- 1.2 As a result of the publication of the national report, '*Without Fear or Favour,*' an Action Plan was created and a Working Group formed, chaired by the DCC on behalf of Norfolk & Suffolk. The remit of the group was to ensure that actions were completed and to prepare for the re-inspection in 2012.
- 1.3 The re-inspection was conducted in August 2012 in order to track progress, and on 19 December 2012 HMIC published its second report '*Revisiting Police Relationships – a progress report.*' HMIC circulated their findings from the re-inspection in the form of a public document which is attached at Appendix 1.
- 1.4 A number of positive issues were noted, in particular:
  - The introduction of a new Media Policy which outlines how relationships with the press should work.
  - The Force had not recorded any instances of inappropriate disclosure to the media between September 2011 and May 2012.
  - The social networking sites policy had been updated and reinforced by a poster and intranet campaign, together with the policy on the acceptance of gifts and hospitality.
- 1.5 There were some areas highlighted within the report for further consideration by the Force and work was immediately undertaken to address these.
  - 1.5.1 With regard to the central register for noting gifts/hospitality, PSD holds this centrally for all officers and staff, and request quarterly updates from area/department local records. Some requests for permission to accept gifts and hospitality are also made directly to PSD and a decision will be made by the Head of PSD or a deputy over acceptance. A record is also kept if offers are declined. The number of entries has remained consistent since the Joint PSD began managing the register in May 2012.
  - 1.5.2 The Procurement Departments for Norfolk and Suffolk have recently been brought together, and HMIC noted there was currently no process in place to cross-reference contract and procurement registers with the gifts and hospitality register, to ensure the integrity of the procurement process. This has been addressed and arrangements are now in place for the Procurement Department to monitor any gifts and hospitality offered to staff. The Head of PSD meets every two months with the Head of Procurement to ensure no inappropriate offers are accepted and that all offers are declared.
  - 1.6.3 A register is maintained by PSD with regard to second jobs and business interests. This procedure is now well established since the joint department began managing the process and 111 applications were received between 1 May 2012 and 31 March 2013, all of which were approved. PSD also reviews approved applications annually to ensure they remain compatible.

- 1.6.4 The 'Without Fear or Favour' Group" – now the "Lessons Learnt" group, continues to meet quarterly to monitor policy on integrity issues, and is developing policy in line with national guidance. The DCC chairs this Group, which is joint between Norfolk and Suffolk, and included on the agenda is an item on Integrity where departmental managers from both Forces are able to identify and raise issues concerning integrity, which are then managed.

The HMIC report suggested the PCC needs to be satisfied with the governance and reporting mechanisms and a representative from the PCC's office now attends this meeting.

- 1.6.5 The Norfolk and Suffolk Anti-Corruption Units (ACU) have been brought together to work collaboratively. This joint ACU has been established since 1 May 2012 and currently has an establishment of 5 police officers and 3 police staff, under the direction of the Operations Manager and the Head of PSD. The current team is led by a Detective Inspector and consists of 2 Detective Sergeant's, 2 Detective Constable's, 2 Analysts, and 1 Researcher. The unit runs a standalone database which contains details of all intelligence reports, associated enquiries and outcomes. The year to 31/03/2013 saw the unit record and deal with 526 intelligence reports. These reports covered the whole spectrum of potential corruption from single instances of Data access to serious offences such as Misconduct in a Public Office. The unit showed it had both the capacity and capability to deal with the most serious instances of corruption from initial reporting through to Crown Court trials. On occasions the unit used ERSOU assets to conduct proactive activities. The unit has also forged links with the collaborated Technical Support Unit (TSU) to ensure a full range of tactics is available.

**2. FINANCIAL IMPLICATIONS:**

There are no financial implications associated with this report.

**3. OTHER IMPLICATIONS AND RISKS:**

There are no other implications and risks.

<b>ORIGINATOR CHECKLIST (MUST BE COMPLETED)</b>	<b>PLEASE STATE 'YES' OR 'NO'</b>
Has legal advice been sought on this submission?	<b>NO</b>
Has the PCC's Chief Finance Officer been consulted?	<b>NO</b>
Have equality, diversity and human rights implications been considered including equality analysis, as appropriate?	<b>YES</b>
Have human resource implications been considered?	<b>YES</b>
Is the recommendation consistent with the objectives in the Police and Crime Plan?	<b>YES</b>
Has consultation been undertaken with people or agencies likely to be affected by the recommendation?	<b>NO</b>
Has communications advice been sought on areas of likely media interest and how they might be managed?	<b>NO</b>
In relation to the above, have all relevant issues been highlighted in the 'other implications and risks' section of the submission?	<b>YES</b>