CLEVELAND POLICE
Putting People First

Professional Standards Department

Counter Corruption Unit

Strategic Threat Assessment from Corruption

&

Control Strategy 2017 - 2018

1. Introduction

1.1 The purpose of this assessment is to:

- provide insight into the threat to Cleveland Police from corruption in all of its forms;
- to identify emerging corruption trends and future threats from corruption ; and
- to inform decision-making in taking preventative, protective and mitigating measures to ensure the highest standard of integrity in the officers and staff of Cleveland Police

1.2 As at 31 March 2017, Cleveland Police comprised of 1280 police officers, 125 PSCOs, 267 members of police staff; 385 Strategic Partnership staff, 63 special constables, a total of 2120 individuals. In the last 12 months up to April 2017, Cleveland Police dealt with over 231,000 reported incidents, and investigated over 50,600 crimes which led to over 16,800 arrests. An organisation of this size and with such a wide ranging scope of operational work demands the highest possible standards of integrity.

1.3 Cleveland Police is undergoing a period of significant organisational change during the course of the coming year in line with the *Towards 2020* plan. The force is currently in a transformational change in relation to redefining its Professional Standards Department (PSD), and during the course of the coming year will be reviewing and revising its professional standards operating practices.

1.4 This assessment draws on data and reporting standards as agreed with the National Policing Counter Corruption Advisory Group (NPCCAG) and supports the national strategic threat assessment to law enforcement from corruption.

1.5 The assessment will be used by the Counter Corruption Unit (CCU), the wider PSD, and chief officers to manage the threat of corruption, and will enable understanding of the circumstances and conditions in which corruption manifests and permeates, as well as the methodologies by which those involved in organised crime initiate, cultivate and sustain corrupt relationships across the public and private sectors.

1.6 This assessment concludes with a local Control Strategy for 2017-2018 in line with the National Intelligence Model, and the dynamic THRIVE model when dealing with incidents (threat, harm, risk, investigation, vulnerability, engagement).

2. Corruption

2.1 For this assessment the following definition of corruption, as used by the National Crime Agency, has been applied: *Improper exercise of a power or privilege for the purpose of achieving a personal benefit, or a benefit or detriment for another person.*

2.2 This is based on the offence of police corruption at Section 26, Criminal Justice and Courts Act 2015 relating to those with the powers of a constable, but for the purposes of this assessment it is taken to cover all persons working for, or with Cleveland Police.

2.3 Organisation control measures are the structures, operating procedures, policies, management models, rewards, sanctions and security measures that are created to define and guide positive behaviours and compliance amongst employees to ensure the correct function of the organisation.

2.4 Corruption will invariably involve either misconduct or gross misconduct in the form of one or more breaches of standards of professional behaviour, or actions, omissions or behaviour that is contrary to standards and principles set out in the College of Policing's *Code of Ethics*. Whilst not every breach of standards of professional behaviour amounts to corruption, whichever definition of corruption is used, it will amount to a breach of at least one standard of professional behaviour.

2.5 For the purpose of this assessment, corruption involving police officers, members of police staff and strategic partnership staff is likely to involve some or all of the following overlapping elements:

- Conduct that is abusive of the trust the public place in the police
- The exercise of police powers and privileges for purposes other than those for which they were conferred or for which a reasonable person would expect them to be exercised, and which is, to this extent, improper
- The deliberate and self-serving misuse of a police power or failure to perform a police duty
- The exercise of police powers and privileges for personal gain, or in order to confer benefits or detriment on others

3 Professional Standards Reporting

3.1 Current reporting procedures reinforce force values and foster a climate where officers, staff and partners feel confident in reporting any known or suspected instance of corrupt or improper practice, from criminal behaviour, on or off duty through to prospective breaches of standards of professional behaviour. The procedure sets out how officers and staff can expect to be supported in making such reports, and is aligned to the *Code of Ethics* as well as to the Standard of Professional Behaviour relating to the duty to challenge and report corrupt or improper practice.

3.2 There are a number of ways in which such reports can be made. It is for the individual to choose which method is the right one for them. Options include reporting:

- directly to line management
- directly to the PSD or to the CCU
- through the anonymous Confidential email system
- through a Staff Association

3.3 Confidential reporting mechanisms have been long-established in Cleveland Police which provides a means of anonymous and completely confidential on-line or telephone reporting. The anonymous email system is available via the force Intranet. New members of Cleveland Police are informed of the existence of this reporting mechanism during their induction training with the force. Members of staff from the PSD remind officers and staff of the facility and the necessity to report any concerns they have during presentations which are given to a range of training courses.

4 Primary corruption threats

4.1 The primary threats to Cleveland Police from corruption vary slightly from year to year. The main current and foreseeable threats are seen to be:

- Vulnerability
- Inappropriate association
- Misuse of Police Systems / Disclosure of police held information

Vulnerability

4.2 Any behaviour by a police officer or police staff member, whether on or off duty, that takes advantage of their position as a member of the police service to misuse their position, authority or powers in order to pursue a sexual or improper emotional relationship with any member of the public. This is in line with current NPCC guidance.

4.3 This includes: committing a sexual act, initiating sexual contact with, or responding to sexually motivated behaviour from another person; entering into any communication that could be perceived as sexually motivated or lewd; or for any other sexual purpose, (including volunteers or staff contracted into police roles).

4.4 Vulnerability includes instances of financial vulnerability as well as more overt forms of off duty conduct that has a potential to bring the police service into disrepute. Standards of professional behaviour apply to personal and domestic life as well as on-duty conduct.

4.5 Instances of alcohol abuse and controlled drugs remain a relatively low level aspect of vulnerability. The Service continues to carry out a programme of random drug testing on officers and staff as well as having the option for intelligence led '*with cause*' testing. Whilst largely preventative, there has been a recent positive result which was dealt with predominantly from a welfare perspective.

4.6 The inappropriate use of social media whilst off duty continues to be a cause of concern for the vulnerability of officers and staff, with a number of cases of offensive or otherwise discreditable postings being reported and investigated. A force policy exists during the course of 2016, the PSD re-emphasised the NPCC guidelines on the safe use of the internet and social media by police officers and police staff.

Misuse of police systems / Disclosure of Information

4.7 There have been a number of recent cases involving officers and staff misusing police systems. These have become apparent through various methods of reporting, including self referral, supervisors raising concerns, and auditing.

4.8 The disclosure of police held information can include suspected disclosures to criminals, family and friends, private investigators, and the media.

4.9 Each breach will be assessed on an individual basis, and reference is given to the Crown Prosecution guidance matrix when determining a decision on how to proceed.

4.10 The capability to proactively monitor the use of the force network remains a concern. This risk has been highlighted and a request has been submitted for monitoring equipment. If approved, this will enable Cleveland Police to focus on information security and enhance the Forces ability to reduce and mitigate the risk of system misuse.

Inappropriate / Notifiable association

4.11 There are currently 151 'live' Notifiable Associations (March 2017). During the course of 2016, Cleveland Police continued to re assess its Notifiable Association Procedure. This has helped officers and staff better understand the obligation on them to report relationships and associations with individuals or groups and associates and ensure such relationships are transparent, are capable of withstanding scrutiny, and are maintained in a manner consistent with being a member of the police service. The ongoing commitment to a programme of Management Vetting has also assisted in identifying potential vulnerabilities as well as those self-declared associations, although there is a backlog in conducting these due to the volume involved.

4.12 A full review of all existing Notifiable Associations is being conducted on their annual review with consideration given to risk, necessity and proportionality.

4.13 The nature and extent of cases of officers and staff investigated for criminality or breaches of standards of professional behaviour relating to sexual misconduct, the forming of inappropriate relationships, and the exploitation of vulnerable persons remains a concern. Cleveland Police has in recent years seen officers dismissed and one currently serving a custodial sentence for such offences. This integrity issue has been a matter of concern to the police service for some time, and work to address and deal with the risks is ongoing. Cleveland Police is currently conducting work to identify and deal with such vulnerabilities, educate officers / staff and prevent offences. The purpose of that programme at work is to protect service reputation, and to instil public confidence through an evidenced commitment to mitigate and reduce such risks to service users.

4.14 We are clear on the importance of intrusive supervision (a recurring theme), the assessment of intelligence, and monitoring of patterns of behaviour as means by which we can be alive to these risks of abuse of police powers. The PSD has been very much alive to the importance of investigative competence and has a robust approach to dealing swiftly and rigorously with the wide range of examples of how such conduct manifests itself across the service. The PSD have presented such examples to Policing Teams by means of ‘road shows’, with a view to prevention and encouraging staff to challenge and report inappropriate behaviour.

5 Control Strategy 2017/2018

5.1 The purpose of this control strategy is to ensure continuing focus on managing the risk to the integrity of the Cleveland Police from corruption in all of its forms, and in particular to build on the acknowledged strengths of the Forces ability to identify, and manage threats, risk and harm from corruption actively and effectively. This will require:

- Strong leadership setting standards of behaviour and professionalism
- Officers and staff being in no doubt about the way they are expected to behave
- Code of Ethics being utilised in everyday policing
- Effective internal governance and external oversight of integrity measures
- Confidence across the Force that misconduct cases and hearings are handled fairly with detailed assessment and proportionate investigations
- Confidence of officers / staff to challenge and report.

5.2 In January 2017 Cleveland Police embarked upon a transformational review of its Professional Standards Department. This coincided with a planned formal review of the Professional Standards Department as part of the Chief Constable's Towards 2020 programme and the Police and Crime Commissioner's aim, as outlined in the Police and Crime Plan developed in 2016, to establish Cleveland Police as a national lead in terms of professional standards.

5.3 The Chief Constable and the PCC made clear their intention to transform the way in which Cleveland Police handles and investigates complaints made against its officers and staff and how it governs its own workforce. It is important to note that the review is about the culture of the organisation and not just about one team, PSD.

5.4 Standards of integrity are further reinforced through the work of the autonomous PSD and the CCU, with oversight and scrutiny from regular Force Integrity Meetings chaired by the Deputy Chief Constable, and with external governance from the OPCC and Ethics Committee.

5.5 The primary threat faced by Cleveland Police going forward is through intentional exploitation of their position through inappropriate relationships, and through a lack of awareness of the boundaries of acceptable behaviour. The willingness and ability of organised crime networks to seek to infiltrate the force and its assets is also recognised, and much emphasis is placed on the work of the CCU to proactively monitor and gather intelligence, and ensure an integrated approach with Cleveland Police Vetting Unit. The CCU maintains strong links to forces regionally and nationally, and also to other law enforcement agencies. Mindful of the limitations on CCU capacity and resources, the CCU maintains a targeted and focused approach to, early intervention, and where appropriate integrity testing methodology.

5.6 Whilst Cleveland Police has the capability and commitment to deal with officers and staff who cross the boundaries of criminality or breach standards of professional behaviour, it is somewhat inevitable that others will continue to do so. There is an ongoing imperative to promote the highest standards of integrity and to remain vigilant to the impact of corruption and corrupting influences.

Counter Corruption Control Strategy 2017 / 2018			
Priority	**Intervention Priorities**	**Protection Priorities**	**Prevention Priorities**
Behavioural Vulnerability Sexual predatory behaviour Exploitation of vulnerable victims Social media misuse Alcohol and substance misuse Unmanageable debt Inappropriate relations	Managing performance and attendance Closer engagement with HR / PIB to identify officers and staff of concern Early intervention in behavioural issues falling short of misconduct and UPP Liaison with corporate communications to identify potential misuse of social media Liaison with partnership agencies and stakeholder groups to identify risk factors (sexual misconduct)	Robust enforcement of identified breaches including criminal investigations where appropriate Monitoring of force systems including intelligence, telephony and GPS data Intelligence led *with cause* drug testing Purchase of monitoring equipment	Publication of lessons learned and organisational learning Core leadership training for first line supervisors Enhanced intrusive supervision and referral to PSD where appropriate Marketing campaigns to reflect current and emerging threats Publication of sanitised version of the Strategic Threat Assessment Continue with random drug and alcohol testing Further instilling of Code of Ethics Publication of guidance on maintaining professional boundaries

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Priority	**Intervention Priorities**	**Protection Priorities**	**Prevention Priorities**
Misuse of Police Systems / Disclosure of Information Members of the criminal fraternity Family and friends Media Private Investigators Information Security Using systems for a non-policing purpose	Close liaison with intelligence units Monitoring of OCGs and links to law enforcement Close liaison with corporate communication regarding police information in the public domain Intelligence systems auditing	Continued lawful auditing of force IT systems, including telecoms Targeted monitoring of social media and Internet usage Use of legislation on police corruption Appropriate utilisation of DPA 1998 legislation	Raise awareness of DPA 1998 Publication of case studies and misconduct outcomes through Lessons Learned Review of systems access including non-police personnel Closer liaison with Vetting to prevent infiltration into the organisation
Notifiable Association Members of the criminal fraternity Private Investigators Journalists / Media	Inappropriate association with vulnerable persons Inappropriate access to victims via role Inappropriate associations with identified groups National Vetting Code of Practice - improved vetting aftercare	Identify known associations Consideration of sanctions for non-disclosure Monitoring of force systems	Review the Notifiable Association policy Raising awareness of first line supervisors to ensure compliance of staff Input during initial training for officers / staff Links with Vetting Unit to identify undeclared notifiable associations