Professional standards governance

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The importance of professional standards within law enforcement means that senior leadership must take responsibility for ensuring that there is capability to address critical professional standards issues. This is specifically in relation to the proper structures, resources, assessments, monitoring, reporting and learning.

Critical professional standards issues

These arise from an act or omission by police officers or staff working in law enforcement. Issues are often slow to develop, have the potential to emerge as an investigation develops, and can in some cases dwarf the initial intelligence or complaint. An issue can become critical owing to a greater understanding of the conduct of the officer or staff member, the likely reputational risk and/or the politicisation of the issue. The management of such issues is considered in **critical incident management**.

Governance structures

Professional standards issues that are, or could develop into, critical incidents should be reported to an officer of Association of Chief Police Officers (ACPO) rank. They will determine the appropriate structures required to underpin the investigation, including any requirement for a **gold group**.

Structures include the following.

National

The professional standards portfolio includes:

- National Policing Counter-Corruption Advisory Group (NPCCAG)

- National Policing Complaints and Misconduct Working Group
- National Policing Vetting Working Group

Regional

- Heads of professional standards department (PSD) meetings.
- NPCCAG meetings.
- Vetting groups.

Organisational

Process to address force-level professional standards issues

This is either an ad hoc group or a permanent committee of individuals who can address cross-departmental learning and prevention opportunities.

Force-level risk management meeting

This is an ACPO-chaired meeting at which predicted risks from departments, including the PSD, are discussed and actioned.

Information security board

This is an ACPO-chaired meeting at which information security risks and mitigation are considered, particularly those concerning the introduction of new systems and vulnerabilities or data loss from existing systems.

ACPO tactical briefings

These are regularly provided to professional standards leads on covert and high-risk investigations.

Gold group

This structure provides a method of managing critical issues that arise from PSD investigations and that have potentially serious implications for the reputation of law enforcement agencies (LEAs). Gold group meetings provide a means of receiving, assessing and addressing information at an organisational level.

Attendance and frequency

The meeting(s) should be chaired by a chief officer or agency equivalent. Attendance is on an ad hoc basis and should include parties who are best able to identify, evaluate and progress an organisational-level response. When deciding on the attendees and the content of meetings, the chair should consider operational security issues including any ongoing tactical and/or source vulnerabilities. The meeting(s) should take place at a frequency proportionate with the issues being considered.

Professional standards departments

- Overt tasking and coordination.
- Covert tasking and coordination.

Resources

Her Majesty's Inspectorate of Constabulary (HMIC) reports – **Police Integrity: Securing and maintaining public confidence (1999)**, **Without fear or favour: A review of police relationships (2011)** and **Integrity matters: An inspection of arrangements to ensure integrity and to provide the capability to tackle corruption in policing (2015)** – highlight the importance of ensuring there is an appropriately resourced overt and covert internal investigation capability.

Staffing

Organisational leads for professional standards should ensure that they have appropriate staffing levels to enable public complaints, internal misconduct reports and intelligence concerning corrupt activity to be investigated proportionately, effectively and efficiently. This presents significant challenges in covert investigations, where the knowledge of internal subjects and the complexity of covert tactics deployed require a higher level of expertise among staff. Training to a **bronze** and **silver** national standard should be provided for counter-corruption staff through the College of Policing.

Secure facilities

To protect the security of intelligence provided through covert methods, there should be secure facilities that allow counter-corruption intelligence material, protectively marked up to and including confidential, to be collected, managed and stored.

Specialist staff and equipment

Covert investigation requires access to these resources, in particular staff who are capable of deploying, servicing and retrieving the equipment. The use of central resources and tracking in covert internal investigations can cause operational security risks. These risks can be mitigated by following the NPCCAG structures for collaborative arrangements with other forces or agencies for the supply of staff or equipment.

Assessment

An understanding of the nature and extent of corruption threats within law enforcement and the wider community is critical to effective intelligence gathering, enforcement, prevention and engagement at an organisational level. Every three years the NPCCAG commissions a national counter-corruption threat assessment that should be complemented by annual local assessments. These examine the nature and extent of current and emerging corruption threats within law enforcement, the circumstances in which such threats arise and associated prevention opportunities.

Corruption threats in the public and private sector

These are considered by the **National Crime Agency (NCA)** and are particularly relevant to LEAs considering collaboration, shared workspaces and outsourcing. Other public bodies, including the **Independent Office for Police Conduct (IOPC)** and **HMICFRS**, and charitable organisations such as **Transparency International**, also produce reports and assessments that will assist organisational understanding.

Public trust

Leaders within LEAs should be aware of the context in which they operate. Neighbourhood surveys and similar consultation exercises may provide an opportunity to test and measure the public's trust and confidence in **police integrity**.

Evaluating and prioritising threats

The role of the ACPO or other equivalent leadership within an LEA is to evaluate and prioritise threats in accordance with the **national decision model** and the **ACPO Police Integrity Model**.

These can assist in commissioning, implementing and monitoring a counter-corruption control strategy (see intelligence).

Responding

Senior leaders should commit to an effective, ethical and professional standards framework based on an assessment of the risk of corruption. The response should be aligned to the force integrity action plan, see **ACPO Police Integrity Model**. Senior leaders should ensure that police officers and staff have a clear understanding of the **Code of Ethics** that underpin their decision making and have ready access to coherent corruption prevention policies (see prevention).

Openness

It is recommended that LEAs communicate both their expectations and their policies to the public, and also provide them with appropriate updates on the outcome of a misconduct investigation. At a time when LEAs are working increasingly in partnership with others and contracting-out work, it is imperative that partners and contract staff operate to the same ethical standards as the LEA staff.

Effective supervision

Effective supervision is a key control measure within LEAs. It is essential that supervisors are given appropriate training on standards and ethical leadership in line with the **Code of Ethics**.

External monitoring

The criminal, civil and coronial courts, the **IOPC** and the media monitor the conduct of law enforcement staff. Police and crime commissioners (PCCs) examine conduct issues as part of their role to ensure a police force is providing an effective and efficient service to the public.

Internal monitoring

Professional standards leads should ensure that there are structures to enable them to identify and address risks and threats at both a strategic and tactical level. The structures should include a coherent corruption prevention policy (see prevention) and an audit capability, to ensure compliance with integrity areas such as:

- business interests
- gifts and hospitality
- procurement
- notifiable association

Health and capacity

The health of the LEA and the capacity of PSDs can be monitored by the type and volume of investigations, complaints and intelligence reports. An understanding of the seriousness of current investigations may also be shown by the number and type of investigations being supervised, managed or independently undertaken by the **IOPC**.

Learning

An effective organisation seeks to learn from any failure in its preventive measures and misconduct among its staff in order to prevent future incidents. To achieve this, all investigations that have resulted in criminal behaviour or gross misconduct should be reviewed.

Structures

Structures should be in place to ensure that learning identified by other organisations and agencies is shared among the professional standards community.

Tags

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