



**ASSOCIATION OF
CHIEF POLICE OFFICERS**

The ACPO Police Integrity Model

The Association of Chief Police Officers recognises that an explicit commitment to integrity is absolutely integral to the legitimacy of policing. As such the following statement, placed alongside the National Decision Making Model (NDM) that has the Statement of Mission and Values (SOMV) at its heart, is central to every decision taken by officers and staff in service of our communities.

The Commitment to Professional Standards and Integrity

Our behaviour, actions and decisions will be always in support of the public interest. We value public trust and confidence in policing as an institution, and to earn this we will be open to scrutiny and be transparent.

The Police Integrity Model will allow us, as a Service, to demonstrate a unified integrity commitment to the public that will earn their trust and confidence.

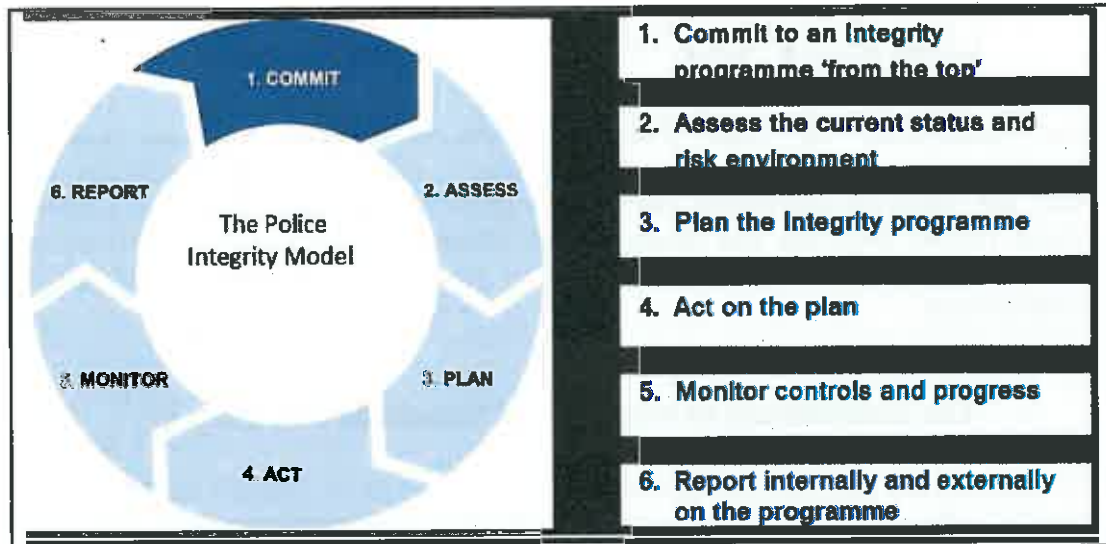
The commitment of ACPO is required and is accompanied by a pledge to champion an integrity model that is uncomplicated and authentic.

This document outlines such a model that has been developed by ACPO following work with Transparency International. It provides a methodical approach to integrity based on the principle of transparency.

The model can be seen its generic form in the diagram below, and is based on international good practice on integrity.

The following pages breakdown each segment of the model and provide a checklist for Chief Officers to consider when applying the model to their own organisation.

The Police Integrity Model



COMMIT

The culture of integrity and compliance in an organisation starts at the top. Commitment means that the organisation shows by its public communications and actions that it will not tolerate corrupt behaviour by its employees or partners. A public statement enhances an organisation's reputation, reinforces the internal policies and systems among employees and partners and can help to deter corruption.

Commitment to integrity is inherent to policing and maintaining public trust. Integrity stands alongside Forces' commitment to public service and its SOMV. As stated in the Nine Principles of Policing, General Instructions, Metropolitan Police, 1829, 'Police, at all times, should maintain a relationship with the public that gives reality to the historic tradition that the police are the public and the public are the police'.

Without consistency in commitment to values there can be no point of reference for an integrity programme. This commitment to integrity should be stated publicly.

- ✓ Commit to the ACPO Police Integrity Model
- ✓ Commit to the Police 'Statement of Mission and Values' (SOMV)
- ✓ Chief Constable to publish a public statement of commitment to transparency
- ✓ Commit to public scrutiny both internally and externally responding to feedback through organisational learning
- ✓ Commit to an integrity action plan which is regularly reviewed in line with the model and can adapt, improve and build upon learning
- ✓ Create an environment where there is confidence to challenge or report corruption
- ✓ Ensure all business is conducted under this framework
- ✓ All senior officers and staff will act as role models for integrity demonstrating the behaviour expected of all ranks and roles within the organisation
- ✓ Recruit and promote only those who commit to and maintain those standards throughout their service

- ✓ Commit to a zero tolerance approach to corruption and a graduated and proportionate approach to investigation and sanctions
- ✓ Commit to the IPCC definition of corruption and the Force anti-corruption strategy
- ✓ Commit to internal and external communication of corruption outcomes
- ✓ Commit partners and contractors to follow the same ethical standards of integrity
- ✓ Establish an independent Ethics Committee, or Reference Group, to allow public scrutiny and demonstrate transparency

ASSESS

Risk assessment is critical to the design of an effective integrity programme. Without a systematic and continuous assessment process, there cannot be a comprehensive and up-to-date view of where corruption risks lie. This will restrict the ability to design and implement adequate policies and procedures to counter risks. Risks should also be regularly reviewed to meet changing conditions.

Considerable work is being carried out by SOCA, ACPO, HMIC and Forces to analyse and understand the underlying structures of corruption and identify the key risks. This work also includes creating a standardised intelligence collection plan to record and report the forms of corruption. SOCA carries out a triennial assessment of risks, supplemented by annual assessments which are seen as internal processes to inform local control strategies as well as inform the national strategic assessment. These annual assessments are further complemented by problem profiles to examine emerging trends.

Forces should rely not only on the SOCA tri-annual assessment and their own annual assessments but on a continuing, dynamic process which addresses local risks and is fed into the national risk assessment.

- ✓ Adopt The National Decision Making Model (NDM) locally, integrating the Integrity Model into current practice
- ✓ Adopt the National triennial SOCA threat assessment model to inform local threat assessment
- ✓ Chief Officers to identify top priorities and recognise their own force's individual threats, trends and issues alongside regional and national issues
- ✓ Annually review the integrity programme and report the key issues
- ✓ Consider other relevant sources such as Office of the PCC/ IPCC / HMIC/ local assessment of complaints and customer service data, and public consultation
- ✓ Build integrity questions into any public consultation exercises and local surveys
- ✓ Utilise all systems and sources to identify risks, for example:
 - *Regional ACPO Counter Corruption Advisory Group (ACCAG)*

- *Staff associations*
 - *Confidential reporting opportunities*
 - *Grievance procedures*
 - *Complaint trends*
 - *Employment tribunals*
 - *Civil actions*
 - *Feedback from line managers*
 - *Judicial reviews*
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- ✓ **Identify gaps in intelligence and produce comprehensive reports**
 - ✓ **Hold regular meetings regarding reputation risk and integrity issues and report on findings**
 - ✓ **Involve the Local Ethics Committee in the risk management of tactical and strategic integrity issues.**
 - ✓ **Consider any issues with cross border sharing of intelligence on staff**

PLAN

Tackling corruption in policing is a process, requiring the diagnosis of specific problems and then the engagement of all staff, partners, and key stakeholders in implementing a remedial plan.

A good anti-corruption plan gives clearly-defined steps to build integrity and transparency into all aspects of policing, thus preventing corruption.

The first step in developing a plan is to take stock of the organisation's strengths and vulnerabilities. This defines the areas that need addressing and guides the approach that will be taken. An anti-corruption plan needs specific time-frames and milestones. Progress on these steps should be reported regularly to a risk management group and an Ethics Committee. There should be a mechanism for monitoring progress and results.

- ✓ Identify appropriate specialist resources and structures
- ✓ Plan the anti-corruption strategy
- ✓ Adopt the enhanced National Decision Making Model
- ✓ Set the strategic objectives and priorities based on the assessment
- ✓ Create and develop an action plan following the PIER principles
- ✓ Set a clear communication plan internally and externally
- ✓ Establish proportionate capability and capacity to deliver the plan with an agreed protocol around asset sharing between forces
- ✓ Adopt ACCAG/Professional Standards Authorised Professional Practice (APP)
- ✓ Counter corruption officers should ideally attend College of Policing PSD Bronze/Silver/Gold accreditation courses with prior credible investigative training
- ✓ PSD staff to be given access to organisational and operational learning enabling the sharing of best practice throughout all forces
- ✓ Plan and test effective response plans in relation to corruption issues
- ✓ Set policies and procedures in line with national guidance

ACT

Acting on the plan is key to the process. Forces must ensure that any action plan is delivered from the top down taking into account national guidance and relevant policies and procedures. It should be adopted and embraced by all supervisors within the organization, in order for it to be effectively and credibly implemented, and for successful outcomes to be achieved.

Any action plan should be regularly reviewed dependent on current trends and risks.

Clearly identified roles and responsibilities will enable greater accountability in the delivery of the plan. Training for leaders within the organisation is essential to ensure better understanding of the issues, focused direction and effective delivery.

- ✓ **Ensure visible Leadership from the highest level**
- ✓ **Prioritise the plan and build in scope for dynamic issues**
- ✓ **Ensure clear accountability for the delivery of the action plan**
- ✓ **Provide training for all staff on standards, values and leadership ethics**
- ✓ **Ensure effective supervision to promote ethical standards with emphasis on training for supervisors to ensure standards are maintained through enforcement and challenging of staff where required. This is key to achieving cultural change**
- ✓ **Ensure policies and procedures are in line with National Guidance, on issues such as:**
 - **Gifts and hospitality**
 - **Procurement**
 - **Expenses and allowances**
 - **Reward and recognition**
 - **Nepotism and cronyism**
 - **Business interests**
 - **Conflict of interest**

MONITOR

Monitoring and review by Chief Officers coupled with independent scrutiny and advice will establish the degree to which the organisation is meeting its integrity objectives.

The HMIC report 'Without Fear or Favour' includes a useful self-check list of integrity questions which could form the basis for an ACPO monitoring and review tool.

An important aspect of monitoring is gaining and disseminating knowledge learned from incidents. Learning from incidents and regular review of monitoring reports by the governance function is an essential component of an integrity programme. Chief Officers should extend the role of monitoring in the NDM and build reviews of monitoring reports into the new structure of governance with PCCs and Audit Committees.

- ✓ Chief Constable reports to independent Ethics Committee
- ✓ Reputation and Risk Management groups chaired by a Chief Officer
- ✓ Progress monitored at mainstream force level performance meetings
- ✓ Auditing systems in place across support services and professional standards departments
- ✓ Tasking systems used to achieve specific actions, such as through routine Force Tasking and Coordination

Key Indicators to be monitored:

- ✓ Progress against risks identified in the plan
- ✓ Gifts and hospitalities
- ✓ Business Interests/Contractors
- ✓ Investigations into complaints and misconduct
- ✓ Sanctions / Results
- ✓ Number of Corruption enquiries with agreed IPCC/ACCAG description
- ✓ Number of IPCC Independent/Supervised/Managed enquiries

REPORT

Reporting to the public is vital, not only because it informs the public what anti-corruption measures a Force is taking, but also because it is evidence of a force's full commitment to integrity.

Regular reporting on anti-corruption programmes also instills an awareness of the issue among employees and communicates externally the importance which the organisation attaches to integrity. As well as raising their capacity to prevent corruption, the process can contribute to staff understanding and their belief in the organisation and its integrity.

Reporting should also include examples of good practice, or difficult judgments that have received the advice of the Ethics Committee. Transparent reporting allows the sharing of innovative anti-corruption techniques among Forces, nationally and internationally.

Transparency about integrity management and the handling of incidents increases public trust and can deter the corruptors. By public reporting of anti-corruption measures and corruption incidents on its website and through other communication channels, a force sends out a correct message that it is acting on the interest of the public and has nothing to hide. It makes clear that the misconduct of a minority does not indict the organisation as a whole. It is essential to earn the trust and confidence of local communities, in local practice such as preventing crime and gathering evidence. It is equally important to earn public trust in the institution of policing and co-operation with the rule of law.

The PCCs will have a reporting role too as a PCC is required to prepare and issue an annual report to the Police and Crime Panel on the PCC's delivery against the objectives set within the Police and Crime Plan. The PCC must also publish information that they considers necessary to enable the people who live in the force area to assess the performance of the PCC and Chief Constable.

- ✓ Publish reports on relevant websites - Force, PCC, Ethics Committee
- ✓ Reporting by the Ethics Committee of recommendations and advice given to the PCC and Chief Constable
- ✓ Reporting on the sanctions / findings / descriptors / lessons learnt
- ✓ Reporting at PCC meetings
- ✓ Provide clear communication to public and staff of how to report or make complaints

- ✓ **Public reporting of complaints, misconduct and integrity issues**
- ✓ **Internal policies and procedures available for public examination**
- ✓ **Relevant websites such as the PCC and force websites to allow easy access to information**
- ✓ **A clear timetable of reporting available to the public to describe which issues are reported quarterly with an additional annual force report**

