



NOTTINGHAMSHIRE
POLICE
PROUD TO SERVE

Nottinghamshire Police Counter Corruption Strategy and Plan

1. Security Protective Marking

1.1 Not protectively marked

2. Application

2.1 This plan applies to Nottinghamshire Police Officers and Staff. For the purposes of this plan 'Officers and Staff' includes Special Constables, Police Community Support Officers, agency staff, partnership workers with access to police premises and systems, volunteers and contractors, e.g. main suppliers of goods or services, agents and subcontractors.

3. Purpose

3.1 This plan provides guidance in relation to Counter Corruption, the types of potential Corruption and how Nottinghamshire Police aims to counter it.

3.2 Corruption in the Police Service in England and Wales remains a rare event, however when corruption does occur, it has a disproportionately damaging and negative impact on the Police Service, individuals and on the public's confidence in the criminal justice system as a whole. Through an annual strategic assessment, Nottinghamshire Police will identify and assess current and emerging threats and patterns of potential corruption. We are committed to minimising the risk through Prevention, Intelligence, Enforcement, Communication and Engagement. From this Strategic Threat Assessment a Control Strategy is formed which identifies the priority areas.

3.3 For the purposes of this plan, Corruption is where a law enforcement official commits an unlawful act or deliberately fails to fulfil their role arising out of an abuse of their position for personal or perceived

organisational advantage which has the potential to affect a member of the public. (IPCC/NCCAG Definition of Corruption). This plan also incorporates corruption by non-law enforcement officials working for or closely with Nottinghamshire Police in a partnership capacity that carry out any activity for gain, favour, advancement, or reward that is inconsistent with the proper practice of their office, employment or responsibility.

4 Discipline

- 4.1 Nottinghamshire Police and the Nottinghamshire Office of the Police and Crime Commissioner will not tolerate corruption in the administration of its duties and responsibilities. They expect senior managers to take positive action whenever corrupt activity is suspected. Our PROUD values reinforce the behaviours expected from all Police Officers and Staff in addition to our Professional Standards and the Code of Ethics.
<http://www.college.police.uk/en/20989.htm>
- 4.2 Disciplinary procedures will be invoked by PSD or HR where improper behaviour indicates a breach of professional standards. On the rare occasions where there is evidence of criminal behaviour from police officers or police staff the matter will be passed to the Professional Standards Directorate (PSD) for investigation and referred to the Independent Police Complaints Commission (IPCC) as appropriate
- 4.3 Disciplinary matters for contracted staff will be dealt with through the appropriate channels however all criminal matters arising from their employment within the Nottinghamshire Police environment must be referred to PSD in the first instance.

5. The Nottinghamshire Police Counter Corruption Strategy

- 5.1 The Nottinghamshire Police Counter Corruption Strategy is:

‘Through Prevention, Intelligence, Enforcement, Communication and Engagement, Nottinghamshire Police is committed to making sure the opportunity for corruption is reduced to the lowest possible risk. Where corruption is identified the organisation will deal with it proportionately and effectively.’
- 5.2 Nottinghamshire Police have an expectation that management and staff at all levels will lead by example, consistently displaying behaviour in line with our PROUD values and ensuring adherence to legal requirements and to all Nottinghamshire Police policies, procedures and practices.

- 5.3 Nottinghamshire Police will deal robustly and fairly with individuals or organisations employed by, or engaged in business with the force that seek to involve its staff in corrupt practices.

6. Culture

- 6.1 An integral part of the Nottinghamshire Police Counter Corruption Strategy is the need to expose corrupt staff and officers by creating an environment which encourages the reporting of incidents and supports proceedings against offenders. This will engender internal and external trust in the integrity of the organisation and the police service as a whole. Nottinghamshire police officers and staff are an essential element in this stance on corruption and are positively encouraged to raise any concerns regarding corruption that is associated with any Nottinghamshire Police activity. They can do this in the knowledge that such concerns can be dealt with in confidence, and will be investigated properly, proportionately and fairly. A number of reporting routes are available including direct reporting to PSD in person, via email, via telephone, the confidential reporting line, or via Integrity Messenger. Further details are contained within the organisation's Professional Standards Reporting Procedure. A team of independent 'supporters' are available to provide support to those people who report concerns in addition to the support they can expect to receive from their divisional welfare officers, federation or staff association and CIC.
- 6.2 There is an unwavering expectation and requirement that all individuals and organisations associated in whatever capacity with Nottinghamshire Police will act with integrity and that the organisation's officers and staff at all levels will lead by example in these matters at all times. Utmost Integrity, Trust and Honesty are key elements of Nottinghamshire Police's PROUD values and it is essential that all officers and staff visibly demonstrate and promulgate these values.
- 6.3 Members of the public are also encouraged to report any concerns which they may have regarding possible corrupt activities by members of Nottinghamshire Police.

7. Prevention

- 7.1 Nottinghamshire Police's Counter Corruption Strategy is complemented by a series of comprehensive and inter-related policies (10.1 below) designed to prevent or discover any attempted corruption. Consistently improving the overall level of integrity and preventing opportunities for corruption is essential to maintaining and improving a high level of public confidence.

7.2 Nottinghamshire Police recognises that a key measure in the prevention and detection of corruption is by setting standards.

PSD support Nottinghamshire Police in this by:

- Carrying out focus groups
- Providing training events for senior managers
- Delivering inputs on integrity to new officer recruits, specials transferees and cadets amongst others
- Designing mandatory Counter Corruption Ncalt training for all Police Officers, Staff and Volunteers
- Producing regular 'Integrity Matters' Newsletters
- Carrying out on line chats with force employees
- Producing an internal integrity webpage accessible to all officers and staff with LAN access
- Attending supervisors training courses such as 'shaping conversations'
- Attending Divisional Senior Management Team meetings
- Attending community events
- Producing guidance to all officers and staff on maintaining professional boundaries and abuse of authority

PSD are constantly exploring opportunities to carry out further prevention work.

An annual 'Integrity Health Check' is also carried out by supervisors as part of the PDR process.

Officers and staff are also encouraged to contact the Counter Corruption Unit through the confidential reporting phone line or Integrity Messenger which is available on the front page of the intranet.

- 7.3 Rigorous vetting procedures for the recruitment of police officers, police staff and non police personnel, physical security precautions and IT security, are important elements in the reduction of the risk of corruption, but none should be viewed or used in isolation from each other. Nottinghamshire Police has a number of relevant policies and procedures as well as our PROUD values and encourages intrusive supervision and line management that reinforces adherence to basic security principles that will have a positive impact on preventing corruption within the police service.
- 7.4 Information and intelligence provides vital knowledge that informs the tactical and strategic decision-making process of the force. Unauthorised and inappropriate access to data sources can be a significant risk to Nottinghamshire Police and minimising these risks

- 7.5 External influences and factors outside the workplace may give rise to a potential vulnerability towards corruption. This can include financial and domestic issues in a variety of guises. Staff, officers, supervisors and managers are reminded of the support mechanisms that are in place through OHU, CIC, Police Federation and Staff Associations as well as through support from divisional managers.
- 7.6 Criminals may seek out financially vulnerable people and offer inducements, rewards or gifts in exchange for information or favours. Unauthorised disclosure represents a real threat to the police service as well as potentially jeopardising the career of officers or staff involved in the illegal trade of information or data. Nottinghamshire Police has a number of policies in relation to notifiable associations and information security designed to minimise this risk and PSD regularly engage with staff and officers around these subjects.
- 7.7 Cases will arise where Nottinghamshire Police officers and staff are influenced by family and childhood friends which may lead to corruption. There is potentially a risk when officers and staff live and work in the same area in which they grew up which could expose them to a possible conflict of interests if their family or friends have criminal links. This must be balanced however with the obvious benefits of people working within a community they know well.

Following initial recruitment vetting, officers and staff have an ongoing responsibility to inform the organisation of any associations with:

- Criminals
- Persons on bail
- Officers or staff who are suspended or who have resigned from the organisation whilst under investigation or have been dismissed
- Journalists
- Private detectives
- Any other individual whereby the association could bring the employee or organisation in to disrepute or increase the risk of corruption.

PSD officers regularly publicise, and will provide on request, advice on the Notifiable Associations Procedure and the process that officers and staff must adhere to.

- 7.8 The Information Security Manager (ISM) currently reports to the Head of Vetting and Information Security within the Professional Standards Directorate. The purpose of the ISM is to provide professional advice to the Information Asset Owners of the organisation relating to the assessment and management of information related risks around the

confidentiality, integrity and availability of information, particularly sensitive information. This includes all types of information, both physical and logical and throughout the lifecycle of the information asset, whilst in storage, processing, use or transit; and the risks created by both malicious and non-malicious actions. The ISM has published a number of policies and procedures which are designed to inform individuals of information processing and handling best practice to reduce the risk of corruption to the organisation through inappropriate disclosure of information.

8. Reporting

- 8.1 If Nottinghamshire Police officers or staff have reason to suspect corrupt activity on the part of a colleague they must raise the matter discreetly and as soon as possible. If immediate contact with a line manager is inappropriate in the circumstances the matter can be raised with the Counter Corruption Unit in a number of ways which are explored in more detail in the Professional Standards Reporting Procedure. Outside of normal office hours, PSD have supervisors on call 24/7 and there should be no delay in reporting corruption matters which could expose the organisation and its employees to risk.
- 8.2 If an officer or staff member raises an allegation of corruption with their line manager, the line manager must contact the Counter Corruption Unit directly and immediately with a view to identifying the appropriate investigative response. Arrangements will then be made to:
- Deal promptly with the matter
 - Appropriately secure and record all evidence
 - Ensure the reportee is adequately supported
 - Take positive action to reduce any risks identified

9. External Bodies

- 9.1 Nottinghamshire Police will co-operate with the following external bodies, whose prerogatives extend over the conduct of our business. This list is not exclusive:
- The Office of Police and Crime Commissioner
 - HM Inspector of Constabulary
 - The Independent Police Complaints Commission
 - HM Revenue and Customs
 - Department for Work and Pensions
 - The Local Government Ombudsman

10. Associated Force Policies

10.1 The following Nottinghamshire Police policies and procedures assist in the prevention and detection of corruption and can all be found in the corporate library:-

DISCIPLINE AND STANDARDS

- Professional Standards Reporting Procedure
- Notifiable Associations Policy
- Business Interests and Additional Employment Procedure
- Gifts, Gratuities and Hospitality Procedure
- Substance Alcohol Misuse and Screening Procedure.
- Unmanageable Debt procedure
- Service Confidence Procedure

COMPUTER SYSTEMS AND ICT USE

- Acceptable Use Policy
- Information Security Policy
- Social and Digital Media Policy
- Using Social and Digital Media securely - Guide
- Internet and Email Use Procedure
- Security Incident Reporting Policy
- A Rough Guide to Online Safety
- Access to the Internet for Non Work Use Guidance
- Protective Monitoring Policy

INFORMATION SHARING AND DISCLOSURE

- Data Protection Breach Procedure
- Sharing with Partner Agencies Guide
- Information Sharing Agreement Procedure

RECRUITMENT/VETTING

- Nottinghamshire Police Vetting Procedures for the Police Community (soon to be replaced by the College of Policing Vetting Code of Practice)

**Professional
Respect for all
One Team
Utmost Integrity, Trust and Honesty
Doing it Differently**

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