

# LEARNING THE LESSONS

**IOPC** Independent  
Office for  
Police Conduct

Improving policing policy and practice



# CORRUPTION

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[www.policeconduct.gov.uk](http://www.policeconduct.gov.uk)

# WELCOME



## Culture and practice: preventing and identifying police corruption

This issue of Learning of Lessons focuses on police corruption. Our research tells us one of the most significant factors in the public developing negative feelings towards the police is when they hear stories about police corruption - often in the news. This influences the public's trust and undermines their confidence.

We know most people join the police because they want to make a real difference in their community. Sometimes police officers and staff, like all of us, can make poor decisions without ill intent. But a small minority join policing with the intent to abuse their position for personal gain, or turn to corruption over time, and fail to uphold the high standards of policing that we all expect.

There is always a risk of further undermining public confidence when highlighting examples of corruption, such as the case studies in this magazine. But we believe it is vital to do this, so that police forces nationally have the opportunity to learn from incidents we have seen through our work, to improve their ability to prevent, identify, and root out police corruption.

In this magazine, we aim to raise awareness of key issues and share insights about how to identify behaviours that have no place in policing. We also highlight the importance of everyone in policing having the confidence to speak up and do the right thing when needed. Case study two on [page 12](#)

highlights an important example of police officers acting courageously and carrying out their lawful duties when faced with corrupt activity from a senior colleague.

Corruption covers a wide range of areas including theft, organised crime, drugs, inappropriate associations, unauthorised disclosure, misuse of social media, and sexual misconduct. The case studies presented in this magazine reflect these themes. Articles contributed by leading practitioners including Chief Constable Lauren Poultney, counter-corruption lead for the National Police Chiefs' Council (see [page 10](#)), help bring key issues to life and expand the learning opportunities on offer. We are grateful to the anti-corruption community for demonstrating the importance of working together to root out police corruption through their contributions to this magazine.

There is no place in policing for corruption. By sharing learning throughout this magazine, we hope to influence improvements to police policy and practice to help deliver the service the public rightly expects.

**Rachel Watson**  
Director General, IOPC

### Content warning



**This issue contains descriptions of incidents involving sexual assault, domestic abuse, mental ill health, and substance misuse (alcohol and drugs).**

Reading this content can have a triggering impact. You can call Samaritans for free on 116 123 or visit [www.samaritans.org](http://www.samaritans.org) if you would like support.

Please see [page 44](#) for more support organisations you can contact if you are affected by this issue.

### Key to case topics

- Custody and detention
- Forensics & evidence gathering
- Information management
- Investigation
- Mental health
- Neighbourhood policing
- Professional standards
- Public protection
- Roads policing
- Guidance

# CONTENTS

## CASE STUDIES

Introducing our case studies	7
<b>1</b> Officer engages in drug misuse and shares sensitive police information	<b>8</b>
<b>2</b> Off-duty senior officer tries to prevent an arrest	<b>12</b>
<b>3</b> Officer's inappropriate conduct towards women	<b>18</b>
<b>4</b> Police officer shares sensitive information about an organised crime group	<b>22</b>
<b>5</b> Failure to report and challenge an officer's relationship with victim-survivor of domestic abuse	<b>28</b>
<b>6</b> Disposing of speeding tickets and disclosing information to the public	<b>34</b>
<b>7</b> Association with an organised crime group and misuse of police systems	<b>38</b>
<b>8</b> Police officer abuses position to develop sexual relationship with a vulnerable woman	<b>42</b>

## ARTICLES

No place for corruption in policing: introducing the IOPC's anti-corruption unit	4
The IOPC report line: raising your concerns	6
Rooting out police corruption: a collaborative approach to emerging issues	10
Becoming upstanders: making policing a service we can be proud of	16
An inspection of vetting, misconduct and misogyny in the police service	20
Tackling misuse of social media and instant messaging	24
Tackling police corruption head-on with Crimestoppers' new anti-corruption reporting service	32
National Crime Agency's Strategic Threat Assessment: the corruption threat to UK law enforcement	36
Prevention and early intervention at Lancashire Constabulary	40

## GUIDANCE AND CHECKLISTS

Support and information	44
Your feedback	46

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# No place for corruption in policing: introducing the IOPC's anti-corruption unit

**John Kelly** discusses how the IOPC's anti-corruption unit seeks to identify those who use their policing powers for corrupt means and how lessons are learned to reduce corruption in the future.



**“ To effectively root out police corruption, it is important that we establish effective working relationships across the anti-corruption community ”**

Police corruption occurs when police officers and staff use their position to their own advantage, or to the advantage or disadvantage of someone else.

The College of Policing's Code of Ethics sets out how policing can deliver a service that is fair and ethical. The standards of professional behaviour, set out in the Police Conduct Regulations 2012, demonstrate the high standards police officers and staff are expected to uphold, and the sanctions that can be applied if they fall short of those expectations.

Police are often called upon to engage with the most vulnerable members of our society and have access to a range of sensitive and personal information about the public. The public must have confidence in how policing operates, and the actions of the police are under constant scrutiny. There is little more damaging to the reputation of policing, and public trust and confidence in the police, than police employees abusing the power they are entrusted with for corrupt means.

## Where does the IOPC fit in?

The police have a responsibility to refer matters of serious corruption to the IOPC. The IOPC's statutory guidance on the police complaints system sets out the type of activity that constitutes serious corruption. This includes, but is not limited to:

- abuse of position for a sexual purpose

- computer misuse offences
- theft and fraud
- criminal associations
- any behaviour that would constitute the criminal offences of misconduct in public office or perverting the course of justice

Investigations into serious police corruption are often sensitive. They require specialist knowledge to oversee the deployment of a range of covert tactics to identify perpetrators, gather evidence, protect victims and make sure offenders are brought to justice. The IOPC's response to corruption investigations is led by our anti-corruption unit (ACU).

## Who are the IOPC's ACU?

The ACU is a specialist team within the IOPC's Directorate of Major Investigations. The team consists of one operations manager, two operations team leaders and seven lead investigators.

All staff recruited to the ACU have knowledge and experience of leading covert and sensitive investigations, or have relevant qualifications in covert law enforcement. More recently, we worked with our learning and development team to launch an internal investigators development programme. This provides an opportunity for a career in the ACU to IOPC investigative staff without

previous experience working on covert or sensitive investigations. Eight lead investigators from across the IOPC completed an intensive course covering covert investigations, risk management, covert tactics and supporting legislation. They have worked alongside an ACU mentor and are gaining exposure to anti-corruption investigations.

The ACU also provides support and specialist advice to colleagues across the IOPC. Members of the ACU also attend the College of Policing's counter-corruption development programme and covert law enforcement managers course.

## What happens once a referral of serious corruption has been made to the IOPC?

We complete an initial assessment and decide what mode of investigation is most appropriate. This could result in a decision that the referral should be investigated independently by us. In the case of non-Home Office forces and agencies who are not subject to the standards of professional behaviour, we may decide on a managed or supervised investigation. This is where the force or agency involved conducts the investigation under our direction and oversight. We may decide a directed investigation is most appropriate if the technical capabilities or resources of forces are required to manage covert investigations.

In directed investigations, the force conducts the investigation themselves into their officer or member of police staff. This is done with the oversight and direction of the IOPC, including clear and agreed terms of reference and a record of working practice. This sets out how the investigation will be carried out.

During a directed investigation, we will provide oversight and direction, tactical advice, share good practice, and connect stakeholders together where mutual support is beneficial. If tactics are deployed during the investigation that require legal authorities, including directed surveillance, we make sure that intelligence and tactical deployments do not exceed what has been authorised.

We receive an average of nine referrals each month. We typically have a caseload of more than 160 live investigations at any time, and complete most of our investigations within 12 months.

## The anti-corruption community

The National Police Chiefs' Council (NPCC) response to police corruption, underpinned by the national threat assessment produced by the National Crime Agency, is set out in a national anti-corruption strategy ([see page 10](#)). To effectively root out police corruption, it is important that we establish effective working relationships with both the NPCC, and across the anti-corruption community.

Members of our ACU are located across England and Wales. Each team member works with ACUs based in local police forces and other agencies.

We attend national and regional anti-corruption advisory group meetings led by the NPCC, and regularly meet with His Majesty's Inspectorate of Constabulary and Fire & Rescue Services to share information to support their thematic inspection work. We also deliver regular presentations to the College of Policing, including their corruption and covert courses to share key learning and highlight the role of the IOPC's ACU. Attendees typically include investigators and officers working in covert roles for the police and other agencies

There is no place in policing for corruption. We work with the anti-corruption community to identify those who use their policing powers for corrupt means, and those who seek to corrupt police employees, to make sure they are dealt with appropriately. We will continue to share learning from our work at a local and national level to reduce the risk of corruption in the future. ■

**John Kelly** is an Operations Manager in the IOPC's anti-corruption unit.



# IOPC report line: raising your concerns

The IOPC report line is designed for police officers and staff to report concerns of wrongdoing in the workplace.



The IOPC report line exists for police officers and staff to report concerns of wrongdoing or malpractice in the workplace. Reports may be made that indicate a criminal offence has been committed or may reveal evidence of misconduct that could justify the bringing of disciplinary proceedings. The report line is sometimes referred to as a whistleblowing line.

## What is whistleblowing?

Whistleblowing is when a person raises a concern about potential criminality, danger, failure to comply with legal obligations, or other malpractice. The person whistleblowing does not need to be personally affected or have a personal interest in the outcome. A whistleblower can simply want to alert others to their concern so it can be addressed. A whistleblower should reasonably believe the information they have is correct, but they are not required to prove this for their disclosure to be legally protected.

A member of policing can use the IOPC's report line to raise a concern about something happening in their police force.

## How is information disclosed through the report line used?

The IOPC assesses all reports made through the report line. We record all reports which meet the criteria in the *Employment Rights Act 1996* as protected disclosures. The IOPC is a prescribed body under this legislation. It provides protection for whistleblowers if they suffer any detriment or negative treatment after making their report.

We will assess what action to take in response to the report. We may act where we have a power to do so under the *Police Reform Act 2002*.

If it is decided that the information should be forwarded to the police force concerned, we will only do so with the written consent of the person who made the report unless there are exceptional circumstances where we believe it is in the public interest.

It is also important to note that the police have their own grievance and complaint procedures for personnel-related issues including promotions, pensions, allocation of work, working hours or discipline. These issues should be raised with the relevant force directly. The IOPC does not have remit or oversight on these matters.

## Can I make a report anonymously?

Yes. We can also help to redact or anonymise your report before sharing it with the police to protect your identity as best as possible. However, you will not be updated on the outcome if you choose to make your report anonymously.

## How do I contact the report line?

✉ Email us: [reportline@policeconduct.gov.uk](mailto:reportline@policeconduct.gov.uk)

☎ Call us: 08458 770061 (lines are open Monday to Friday, 9am-5pm - please leave a voicemail after hours).

🌐 Find out more in our frequently asked questions: [www.policeconduct.gov.uk/publications/report-line-frequently-asked-questions](http://www.policeconduct.gov.uk/publications/report-line-frequently-asked-questions).

# Our case studies: an overview



The IOPC investigates some of the most serious and sensitive matters involving the police. We also share learning from our work to improve police policy and practice, so that everyone can have trust and confidence in policing.

Some of the most serious matters we investigate that have the greatest potential to impact public confidence relate to police corruption; the focus of this issue of Learning the Lessons.

In this magazine, we have carefully selected eight case studies to share with you. They are based on real investigations the IOPC has completed or directed, highlighting some of the common types of cases we see. Some of the case studies demonstrate clear examples of corruption – where a member of policing has knowingly abused their position for personal gain. We share these case studies to ask readers to reflect on opportunities to improve policies and practices to prevent similar adverse incidents, including those working in counter-corruption units, professional standards departments, training teams, line management roles, and frontline officers and staff.

Some of the case studies explore wider themes in connection with corruption, including ethics, integrity, professional standards and police culture. These case studies may feel more reflective of scenarios you have encountered, heard about, or could more easily imagine. These case studies are designed to encourage you to consider your own knowledge

“ These case studies are designed to encourage you to consider your own knowledge and confidence ”

and confidence. For example, what would you do if you saw a colleague behaving in a way that did not feel right, or in line with what the public expect from policing? How confident would you feel to speak up? As a supervisor, how can you foster a culture where officers and staff are supported to do the right thing?

All our case studies include a set of reflective questions for readers, designed to unpack key learning opportunities. We ask you to consider your own answers to those questions, and encourage your colleagues and team to do the same. By sharing learning from our work we hope to encourage you to consider opportunities to identify and prevent corruption, so that everyone can have trust and confidence in policing. ■

Megan Oliver is the Learning and Improvement Lead at the IOPC.





## CASE STUDY 1



# Officer engages in drug misuse and shares sensitive police information

**This case was investigated by the force's anti-corruption unit as part of a directed investigation by the IOPC.**

A force made a referral to the IOPC. They reported that a serving police officer may be associating with known criminals and sharing sensitive police information with them. The force also reported the officer was suspected of consuming class A drugs. The officer had under two years' service with the police.

The officer was suspended from duty and an IOPC directed investigation began.

The officer's financial records were examined as part of the directed investigation. They revealed the officer had been sending money to a range of people known to the police for drug offences.

This included the officer making regular payments over a long period of time to one man. The payments ranged in value up to £200. The most common payment was around £40. The directed investigation noted this was the approximate price for a one gram bag of cocaine at the time.

Further payments had been made to two different men known to the police for dealing class A drugs.

The officer had also received several payments from others. This included regular payments ranging from £5 to £50 from a man known to the police for previous serious offences. The officer had also exchanged money with another man known to the police for drug use and other offences.

An audit was completed on the officer's personal mobile phone. It revealed a volume of messages between the officer and others describing drug misuse. One person had messaged the officer to describe their experience taking an anti-depressant prescription drug. The officer responded and described his own experience taking cocaine. The officer had also noted to another person that he had an issue with consuming cocaine after about a year in the police. The officer also referred to drinking 'nose beers' and consuming 'coke', both slang for cocaine. He noted how they gave him a 'comedown'.

The officer had also been communicating with different women via dating apps. The officer discussed consuming class A drugs in these interactions. He told one of these women he worked for the police.

The officer's phone also revealed messages to the officer from a man known to the police for supplying class A drugs. In one message, the man asked the

officer if a person he knew had been recently arrested for theft. The officer responded and confirmed what offences the person had been arrested for. The man made it clear to the officer he knew the arrested person and the arrested person's ex-partner.

The arrested person's ex-partner had a restraining order against the arrested person. This highlighted potential vulnerabilities and concerns regarding the arrested person's previous behaviour. The IOPC noted this added to the severity of the data breach.

The officer sent further messages to the man discussing the arrested person. The directed investigation revealed the officer had been to the incident when the person had been arrested. This is how he knew the details of the arrest.

### **G College of Policing Code of Ethics – Guidance for ethical and professional behaviour in policing**

#### **Confidentiality**

We understand the importance of managing information that comes into our possession through our police work. We understand that we have the responsibility to share some information when it is needed and to protect other information from misuse.

#### **More information**

[www.college.police.uk/ethics/code-of-ethics/guidance](http://www.college.police.uk/ethics/code-of-ethics/guidance)

Shortly following this message, the officer sent another message to the man to ask for cocaine. They planned to meet in a car park for the exchange.

The officer messaged the man again a week later to ask if he was home. The directed investigation noted this message implied the officer wanted to purchase more cocaine. They again discussed meeting in a car park.

The officer's police vetting form completed by all new starters was assessed. It noted the officer had ticked 'no' to being aware of any people who engage in criminal activities.

The officer was arrested for misconduct in public office and corruption. Samples were taken from the officer. These confirmed he had ingested cocaine recently.



Photo: Alamy

The officer's home, vehicle and work locker were searched. Zip lock bags containing traces of cocaine were found during a search of the officer's home. The officer's DNA was later matched to the bags.

The officer admitted to possession of class A drugs in a statement. He admitted to consuming them for personal use. ■

### **KEY QUESTIONS FOR MANAGERS, POLICY MAKERS AND TRAINERS**

- How do you make sure your policies, guidance and training reflect the Standards of Professional Behaviour and Code of Ethics?
- How do you continuously assess if your vetting process is effective, including in identifying people potentially involved in criminal activity?
- How do you raise awareness with new recruits about the increased risks of becoming vulnerable to corruption if they engage in illegal activity, including drug use?
- What steps do you take to make sure officers and staff are aware of the potential consequences of engaging in corruption?
- What services do you have to support the mental and physical wellbeing of officers and staff?

### **KEY QUESTIONS FOR POLICE OFFICERS AND STAFF**

- What steps should you take if a person you know personally becomes involved with criminal activity?
- Why is it important to you that the police maintain the highest standards of confidentiality?
- How can you find out more about the wellbeing support available to you at work?

### **ACTION TAKEN BY THIS POLICE FORCE**

- The force developed their drug testing procedure. They reinforced a zero-tolerance approach to anyone who provided a positive drug test result. Drug testing also takes place before recruiting police officers and special constables. Random drug testing can take place for police officers in post.

### **OUTCOMES FOR THE OFFICERS AND STAFF**

The case was referred to the Crown Prosecution Service for misconduct in public office and corruption. The officer received a caution. The officer was found to have a case to answer for gross misconduct. He faced disciplinary proceedings for breaching the Standards of Professional Behaviour for honesty and integrity, discreditable conduct and confidentiality.

The officer resigned during the misconduct process. He would have been dismissed without notice had he still been serving. The officer was placed on the barred list stopping him from working for the police in future.

Talk to a With You recovery worker online for free at [www.wearewithyou.org.uk/](http://www.wearewithyou.org.uk/) if you have been affected by this case and would like support.



# Rooting out police corruption: a collaborative approach to emerging issues

**Chief Constable Lauren Poultney** analyses trends in police corruption, drawing out three areas of particular concern: sexual misconduct, social media and business interests.

In recent years, the harsh light of scrutiny has swung onto police corruption, bringing with it real change.

I chair the National Police Counter-Corruption Advisory Group (NPCCAG), alongside my duties as Chief Constable of South Yorkshire Police. I have held this portfolio for three years and I am grateful to be able to explore some emerging issues with you in the spirit of 'learning the lessons'.

The NPCCAG brings together representatives from police anti-corruption teams across England and Wales, and other agencies including the IOPC, College of Policing, His Majesty's Inspectorate of Constabulary and Fire & Rescue Services, the National Crime Agency, and more.

During NPCCAG meetings we discuss emerging trends, extreme examples of corrupt conduct, demand on professional standards departments, and cultural issues. This work highlights the huge collective effort to prevent and detect corruption, and an openness to share lessons learned in individual cases.

I have often reflected on the challenge that policing 'self-harms' by publicising gross misconduct or criminal cases involving police officers. However, I believe transparency is critical in building public confidence. Police officers and staff hold unique roles in society, and it is right that our actions attract public scrutiny.

No other agency is so transparent. This can be uncomfortable, frustrating, but always appropriate. I also believe transparency is critical internally in police forces so we can all be confident that issues will be dealt with appropriately.

## Key areas of work

Through the work of the NPCCAG, we see trends in police corruption as they emerge. We categorise them into areas referred to as 'STUDIOSB':

- sexual misconduct
- theft
- unauthorised disclosure
- drugs
- inappropriate associations
- organised crime
- social media
- business interests

Each area has a lead who drives the development of policy and practice, shares learning and highlights good practice. Over the last year many of these leads have hosted knowledge sharing events, supported by the College of Policing, as part of our work to develop standards and knowledge nationally.

I have highlighted three areas of particular concern, where significant efforts are being made to drive forward change:

**“ I believe transparency is critical in building public confidence ”**

## Sexual misconduct

This is the most common form of corruption and poses the greatest threat to policing.

Abuse of position for sexual purpose (APSP) describes behaviour by a police officer or staff, whether on or off-duty, which takes advantage of their position, authority or powers to pursue a sexual or improper emotional relationship with a member of the public. This includes but is not limited to:

- sexual intercourse or touching
- sexual contact regardless if it is initiated by a member of the public
- requesting sexual favours in exchange for pursuing or not pursuing a police function, for example a speeding fine or an arrest
- gratuitous sexual contact, for example inappropriate or unnecessary searches
- sexually motivated inappropriate or lewd communications
- unnecessary contact to develop a sexual or improper emotional relationship (using police or private communications systems)

The NPCCAG and APSP working group has been working closely with Professor Fay Sweeting from Bournemouth University to identify and understand commonalities in APSP offenders. This is to understand 'red flags', which we can use to identify behaviours early to help protect the public and each other. This work is ongoing, and some red flags have already been identified:

- 'knight in shining armour', for example an officer dealing with a vulnerable victim suggests that they are the only one who cares, and say they went above and beyond to help
- giving compliments and gifts
- moving from using professional contact details to personal ones
- social media contact
- unexpected visits to a member of the public
- contact after an investigation is finished
- overly friendly or inappropriate language
- nicknames which may indicate a type of behaviour
- radio silence while on-duty

Understanding red flags is our route to more action. Policing and its powers will always be of interest to those intent on causing harm. However, knowing the

red flags, and highlighting them for all to see, allows us to make policing a hostile environment for offenders. This work aims to rid us of the inevitable conversations which follow a prosecution, in which we discover the flags were there.

This work is supported by a short training film on APSP which I have made mandatory to watch in South Yorkshire. I have written to all chief constables to encourage the same. The film will be available in autumn 2024 through College Learn.

In South Yorkshire, supported by South Wales Police and the College of Policing, we held an online event exploring APSP. This was attended by around 100 people from across the force in a variety of roles, demonstrating genuine commitment to root out harm. We are happy to support other forces intending to deliver something similar.

## Social media

Social media is an ever-changing area, and a real concern for counter-corruption units. Social media will be the focus of our next knowledge sharing event. It will be held in November 2024. Information about this event will be available through the College of Policing. Please join us there.

## Business interests

Business interests is a new area of focus for police corruption. Business interests are not a form of corruption if they are fully disclosed and approved, as many are by police forces each year. However, there are business interests which are appropriately declined. This is a risk for police forces as the drive to earn additional money is a tempting factor for the applicant.

The focus of our work on business interests is around the checks carried out by counter-corruption teams to make sure declined business interests have not continued, and conditions set against approved business interests are adhered to.

## A message to you

We can root out police corruption if we work together. If you are aware of something that does not feel right, I urge you to report it to your local professional standards department, the national police anti-corruption and abuse reporting service on 0800 085 0000, or online at [crimestoppers-uk.org](https://crimestoppers-uk.org) (see page 32).



**Chief Constable Lauren Poultney**, South Yorkshire Police, is the counter-corruption lead for the National Police Chiefs' Council.



## CASE STUDY 2



# Off-duty senior officer tries to prevent an arrest

**This case was independently investigated by the IOPC.**

An off-duty, high-ranking senior police officer went to a friend's party. At the party were several people the senior officer had known for years.

An argument between two family members at the party began to escalate outside the house in the early hours. This involved a man and a woman. The man's tone was described as "very loud, as if he were screaming". He pushed the woman backwards "extremely aggressively". The woman fell backwards and hit her head on the floor, briefly losing consciousness.

The senior officer was upstairs during the incident. He was alerted by the noise and came outside. He saw the woman lying on the floor.

Two neighbours called the police. One told the call handler "there's somebody there having a complete melt down... he's saying 'I'm guna kill you'".

A new student officer and her mentor arrived five minutes later. The mentor recognised the senior officer at the scene. She noted he was wearing plain clothes and assumed he was off-duty. The senior officer did not make himself known to the officers.

The mentor and student officer spoke with the man reported to have injured the woman. Body worn video (BWV) showed the man describing the incident. The senior officer appeared and said to the man "no-one's committed a crime tonight. No no sssh... I'm going to help you".

The senior officer tried to speak with the mentor in private several times. He said: "I can tell you the decisions you might want to make". The mentor later reflected she felt the senior officer was interrupting her in her duty to obtain a full account of what had happened.

The mentor asked the senior officer if he was a neighbour of the family. He did not respond and spoke to the man reported for injuring the woman in a "loud and fairly authoritative manner". The mentor said she considered the senior officer "may be trying to stop [the man] from talking". The mentor continued to try to ask the man questions. BWV showed the senior officer nearby looking annoyed, rolling his eyes, and sighing.

The senior officer asked the mentor for a private minute with the man reported to have injured the

woman. The mentor agreed, influenced by the senior officer's rank. The senior officer turned his back to the mentor and whispered to the man. BWV captured him saying "do me a favour keep your gob shut and I will sort this out for you. No one needs to get arrested".

The senior officer was challenged on these comments during the IOPC investigation. He said he wanted to advocate for the man but did not intend to do anything illegal.

While establishing the facts, the senior officer was asked by the mentor and student officer what had happened. The senior officer repeatedly asked the mentor to stop typing notes in her digital pocket notebook. The mentor explained why it was important she made notes. She later said: "He was getting angry with me. I felt intimidated by him at this point, but I stood my ground".

An additional officer and sergeant arrived at the scene. The sergeant approached two other family members for statements. During the IOPC investigation, the sergeant noted it was clear an assault had taken place and "as they and the suspect were family members and were over 16, the incident fell squarely within the definition of a domestic incident". The IOPC investigation agreed.

The senior officer asked who was overseeing the scene and the sergeant identified himself. The senior officer made several attempts to speak with the sergeant in private. The sergeant refused. The sergeant said during the IOPC investigation that he refused because he felt the senior officer was trying to control the situation. The sergeant asked the senior officer to identify himself. He failed to do so and walked away.

The sergeant decided to arrest the man. The senior officer stood between them as the sergeant explained his decision to another officer. The sergeant reflected

**“ The sergeant asked the senior officer to identify himself. He failed to do so and walked away ”**





that “due to the fact I now knew he was a high-ranking officer, I didn’t feel like I could make him walk away”.

The senior officer said to the sergeant “stop there... there is no crime that has been committed here tonight... when you wake up in the morning none of these people will be supporting any kind of prosecution nor any evidence-based investigation”. The sergeant believed this comment implied the senior officer was going to encourage the family to not provide statements.

The sergeant proceeded with the arrest. The senior officer was captured on BWV telling the sergeant he thought the decision was “crap”. The sergeant reflected that the senior officer’s demeanour became aggressive and “bullyish”.

**G The Police (Conduct) Regulations 2020 – Schedule 2: Standards of Professional Behaviour**

- Discreditable conduct**
- Police officers behave in a manner which does not discredit the police service or undermine public confidence in it, whether on or off-duty.
  - Police officers report any action taken against them for a criminal offence, any conditions imposed on them by a court or the receipt of any penalty notice.
- More information**  
<https://www.legislation.gov.uk/uksi/2020/4/made>

**“ The investigation found the senior officer’s advice contradicted force policy ”**

The IOPC investigation recognised the emotional impact this interaction may have had on the sergeant and the junior officers present. The investigation recognised the attempts of the sergeant and other officers to remain professional, composed and to carry out their lawful duties.

The senior officer outlined the force’s domestic abuse policy, suggesting an arrest was not necessary. The investigation found the senior officer’s advice contradicted force policy and an arrest was appropriate.

The senior officer went into the house where the



injured woman was. The sergeant was concerned the senior officer would try to influence the woman’s statement, so he followed. The senior officer asked to speak to the woman privately before she spoke with the sergeant. The senior officer tried to dismiss the sergeant and said “off you go, thank you”.

The man suspected of causing the woman’s injury was arrested and taken to custody. The senior officer’s conduct was highlighted to the force’s professional standards department and referred to the IOPC following a review of BWV. ■

Call the National Domestic Abuse Helpline if you have been affected by this case and would like support. It is free, confidential and open 24 hours a day on 0808 2000 247. For more information visit <https://refuge.org.uk/>

- KEY QUESTIONS FOR POLICE OFFICERS AND STAFF**
- What would you do if you had concerns about the conduct of a colleague?
  - How familiar are you with the process to report concerns about the behaviour of a colleague at work, including someone more senior in rank?
  - Why is it important to you that the Standards of Professional Behaviour and the Code of Ethics are upheld by everyone in policing?

**ACTION TAKEN BY THE FORCE**

- The force raised awareness of this incident internally and externally by communicating what had happened and sharing footage to promote learning opportunities. They set out expectations to officers and staff and demonstrated they will be supported if they also needed to call out inappropriate behaviour of colleagues, regardless of rank. Senior officers also received a briefing from the force’s deputy chief constable outlining the expected Standards of Professional Behaviour and the Code of Ethics.

**OUTCOMES FOR THE OFFICERS AND STAFF**

The senior officer was found to have a case to answer for gross misconduct. He faced disciplinary proceedings for breaching the Standards of Professional Behaviour for authority, respect and courtesy, duties and responsibilities, and discreditable conduct.

The senior officer retired during the misconduct process. He would have been dismissed without notice had he still been serving. The senior officer was placed on the barred list.

The force formally recognised the outstanding courage and leadership demonstrated by the officers and sergeant to challenge the senior officer, perform their duties and follow force policy.

- KEY QUESTIONS FOR POLICY MAKERS/MANAGERS**
- What does your policy say about what off-duty officers should do if they are at an incident where police are called?
  - How do you create and maintain a culture where officers and staff are encouraged to speak up about inappropriate behaviour of colleagues?
  - How do you encourage new recruits to feel supported to speak up if they see inappropriate activity, including from a higher-ranking officer?
  - What audits or dip-sampling do you undertake of BWV which may help highlight potential misconduct?



# Becoming upstanders: making policing a service we can be proud of

**Marcus Griffiths** discusses how the recently revised Code of Ethics and Vetting Code of Practice work together to deliver a better service in policing.

Most people would define the important qualities required by a police officer as honesty, trustworthiness and integrity. These are the minimum that we and the public should expect - not just from officers and colleagues, but from all those in policing.

Most police officers and staff proudly embody these qualities. However, the actions of a minority have significantly affected public trust and confidence. This means that scrutiny of policing is higher than ever.

## Ethical policing

The College of Policing constantly updates its authorised professional practice (APP) guidance: the official source of professional practice on policing. Work had already begun to revise the Code of Ethics long before the recent trials of those bringing policing into disrepute.

The publication of the revised Code of Ethics at the beginning of 2024 provided an opportunity to pause and reflect. This allowed us to consider how everyone involved in the service could better demonstrate courage, respect and empathy. We sought to deliver a better service by embedding the Code of Ethics more effectively and focusing more on what the public expects from policing.

Our aim at the College of Policing is to enhance and support a service we can all be proud of and seek constant improvement. Most importantly, we want to uphold the public's expectations.

The revised Code of Ethics supports us to deliver a fair and ethical service, trusted to make decisions that keep people safe. Its aim is to make sure policing does the right things, in the right way, for the right reasons. It encourages personal responsibility alongside professional judgement.

It is important to emphasise how this works alongside



**“Everyone needs to take personal responsibility and uphold the principles and expectations of the Code of Ethics”**

the statutory Code of Practice for Ethical Policing. This separate code of practice sets out how chief officers should support staff to use ethical policing principles and demonstrate professional behaviour. Both codes are designed to support our police culture to change and become more ethical. These strengthened products require us to live by the principles and expectations they set out as individuals and within wider police culture.

The College of Policing's revised Vetting Code of Practice was published last year in addition to the Code of Ethics. Our supporting Vetting APP is now being redeveloped after an extensive consultation process and will be released soon.

These three distinctive strands are designed to work together. They will help make sure that only suitable individuals who demonstrate the behaviour and high standards we expect in the service join as officers or staff. Those already in the service must continue to fulfil these expectations to continue to hold vetting clearance. More information: [www.college.police.uk/ethics](http://www.college.police.uk/ethics)

## Vetting and ethics

Vetting has rightly come under enhanced scrutiny. The College of Policing seeks to support chiefs and forces by strengthening our Vetting Code and Vetting APP. These provide clear expectations, standards and guidance on how police vetting is undertaken.

Policing needs urgently to dispel the impression that vetting is only important at the point of entry. This has never been the case. Therefore, the revised Vetting Code of Practice and Vetting APP raises requirements and expectations of both individuals holding vetting clearance and supervisors across the service.

Everyone needs to take personal responsibility and uphold the principles and expectations of the Code of Ethics. This means maintaining vetting clearance by fully disclosing changes in personal circumstances that affect vetting status.

Our new Vetting APP requires supervisors to complete an annual integrity and vetting review. Supervisors see and know staff. They are in the best position to identify and understand issues that mean a force vetting unit needs to assess vetting clearance impact. Supervisors are responsible for making sure the quality of service to the public and supporting staff is high. Their role is critical in understanding the risks that mean a vetting review is needed.

We all want to improve policing and rebuild public trust and confidence. To do this, we must know what the Code of Ethics says and act on it every day of our working lives. We need to consider the Code of Ethics in every decision we make, and wear our vetting clearance like a badge of honour.

However, cultural change will not come about through

good intentions alone. The value of role models and leaders calling out inappropriate behaviour and language cannot be underestimated. Individuals follow what they see, and not always what they hear or read.

An important requirement of our revised Code of Ethics is challenging unacceptable behaviours when we see them. This means becoming an upstander rather than a bystander. Only when all of us routinely challenge unacceptable behaviour will we make the policing service something we can all be proud of.

More information: [www.college.police.uk/guidance/vetting-code-practice](http://www.college.police.uk/guidance/vetting-code-practice)

## Becoming an upstander

Every time inappropriate behaviour occurs and nobody intervenes, it becomes 'normal around here' and part of an accepted culture. Officers and staff should work in an environment where calling out inappropriate behaviour is the norm, and is supported by peers and leaders. Sadly, this is not always the case.

The College of Policing developed its upstander training to address this. This gives everyone in policing the knowledge and skills to challenge inappropriate behaviour when they see it, and to know how to report it.

This interactive training is delivered in force online or in-person. It is most effectively delivered as part of a package of products to support behaviour and culture change. These products focus on the Code of Ethics. They address sexism, misogyny and racism under the violence against women and girls and police race action plan programmes.

The training is based on an intervention framework that gives everyone the tools to decide how and when to act, depending on the situation. This looks at real-life experiences, force-specific examples and facilitates group discussions. It includes a force commitment through a chief officer introduction, with opportunities to highlight forces' own policies, reporting tools and staff networks.

Only by creating a safe working environment together can we make sure everyone is respected and feels included consistently at work. ■

**Marcus Griffiths** is Policing Standards Manager – Ethics, Integrity and Professional Standards at the College of Policing.





## CASE STUDY 3



# Officer's inappropriate conduct towards women

Photo: Alamy

**This case was investigated by the force's anti-corruption unit as part of a directed investigation by the IOPC.**

A force completed a routine audit of police-issued mobile phones. The audit identified that over a 12 month period, one officer had exchanged an unusually high level of text messages with several different women.

Phone data showed the officer had communicated with the women 1704 times. This communication happened at all times of day, including when the officer was on and off-duty.

The force spoke with the women during the IOPC directed investigation. Five of the women confirmed they had met the officer on dating websites and apps. They said the officer had mentioned he worked for the police, but he had not disclosed any information to them about his role.

Another woman disclosed she met the officer in a professional capacity through her work. The officer and woman had exchanged contact details initially in a professional capacity. The woman reported texts between them slowly became "flirtatious" which she felt was initially "ok". However, the woman noted the officer began to send texts which were sexual in nature. The woman ignored them. The officer asked the woman if she wanted to come to his house on a couple of occasions. She did not want to and made excuses.

The woman reported that the officer had also communicated with her by email. She described some email exchanges as "flirtatious".

A further audit was carried out on the officer's work emails. This identified the officer had high levels of communication with an additional woman. The officer had encountered this woman through his policing role.

He was dealing with a domestic abuse investigation related to the woman's ex-partner.

The audit revealed the officer had sent "non-professional" emails to this woman. He described himself as having several girlfriends and asked the woman about her "best assets". In one of the woman's replies she mentioned her ex-partner had forced his way into her property. The officer replied and advised her to report further incidents to the police. His communication with this woman stopped after this email. In the woman's statement, she recalled that the officer was "perhaps a little flirtatious".

## PEEL spotlight report: Shining a light on betrayal

The National Police Chiefs' Council (NPCC) defines abuse of position for a sexual purpose as:

"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".

### More information

[hmicfrs.justiceinspectorates.gov.uk/publication-html/shining-a-light-on-betrayal-abuse-of-position-for-a-sexual-purpose/](https://hmicfrs.justiceinspectorates.gov.uk/publication-html/shining-a-light-on-betrayal-abuse-of-position-for-a-sexual-purpose/)

The audit of the officer's emails also highlighted several inappropriate emails the officer had sent to male colleagues about female colleagues which

used degrading language. In one example, the officer described a female colleague as attractive. He said she was "too young" for him, but another male colleague would "love her". In another email, the officer discussed sending an explicit picture to a female colleague.

Around the same time, a female officer came forward to report the officer had sexually assaulted her.

The female officer described how the officer had begun exchanging mostly work-related texts with her. They met once while off-duty and the officer asked the female officer for a hug. As they both lent in for a hug, the officer tried to kiss the female officer. The female officer stepped back and asked the officer to not touch her. The officer took hold of her neck and waist and kissed her on the cheek. She pulled away from him and they both left.

The female officer told a colleague about what had happened a few days after the incident. This conversation was overheard by other officers. They recommended the female officer report this incident to her supervisor promptly. The female officer reported the incident to her supervisor.

## College of Policing Code of Ethics - Guidance for ethical and professional behaviour in policing

As policing professionals, we have a positive obligation for challenging or reporting behaviour that is unprofessional.

### More information

[www.college.police.uk/ethics/code-of-ethics/guidance](https://www.college.police.uk/ethics/code-of-ethics/guidance)

The officer was arrested on suspicion of misconduct in a public office and sexual assault.

The officer acknowledged during interview he had been in communication with several women via his police-issued phone. The officer accepted the texts and emails he sent were not appropriate and that some could be interpreted as "flirtatious".

The officer also accepted "in part" that the emails he sent about female colleagues were "inappropriate in nature, distasteful and offensive". He stated he had not sent an explicit image to anyone but did accept referring to doing so.

In relation to the sexual assault report by the female officer, the officer said he had asked for a hug, and gave the female officer a "peck on the cheek". He said afterwards he believed everything was "amicable". ■

Call Victim Support on 08 08 16 89 111 if you have been affected by this case and would like support. For more information visit [www.victimsupport.org.uk](https://www.victimsupport.org.uk)

## KEY QUESTIONS FOR MANAGERS, POLICY MAKERS AND TRAINERS

- What steps have you taken to make officers and staff aware of what constitutes appropriate use of police-issued devices?
- What regular audits do you perform that may help to identify potential misuse of police-issued devices?
- How do your policies, guidance and training help officers and staff understand what constitutes abuse of position for a sexual purpose?
- What support do you have for police officers and staff who are victim-survivors of sexual assault?

## KEY QUESTIONS FOR POLICE OFFICERS AND STAFF

- What steps could you take to improve your understanding of what actions and behaviours constitute abuse of position for sexual purpose?
- How confident would you feel to challenge inappropriate behaviour of colleagues?
- How would you encourage a colleague to speak up if you heard they had experienced inappropriate behaviour by another colleague?

## OUTCOMES FOR THE OFFICERS AND STAFF INVOLVED

The officer was found to have a case to answer for gross misconduct. He faced disciplinary proceedings for breaching the Standards of Professional Behaviour for discreditable conduct, authority, respect and courtesy, duties and responsibilities, and orders and instructions.

The sexual assault report was referred to the Crown Prosecution Service, but no criminal charges were authorised.

The officer resigned during the misconduct process. He would have been dismissed without notice had he still been serving. The officer was placed on the barred list.



# An inspection of vetting, misconduct and misogyny in the police service

**Su Wilshire** discusses misconduct and misogyny in the police service, since the publication of HMICFRS' 2022 report into the police's vetting and counter-corruption arrangements.

Tackling police corruption and misconduct is a complex area of policing. Most police officers and staff are dedicated public servants who meet and often exceed the standards of behaviour the public expect. But an examination of corruption and misconduct in recent years points to some systemic failings, missed opportunities, and a generally inadequate approach to standards in the service. There are still individuals who exploit and abuse their position. This must stop.

## Home Secretary Commission

Sarah Everard was murdered by a serving police officer in 2021. The then Home Secretary commissioned Her Majesty's Inspectorate of Constabulary, Fire & Rescue Services (HMICFRS) to inspect the police's vetting and counter-corruption arrangements in response. This included assessing forces' abilities to detect and deal with misogynistic and predatory behaviour by police officers and staff.

## Our approach and survey

We considered current vetting (and re-vetting) arrangements for transferees, whistleblowing arrangements, the work of counter-corruption units and the work of professional standards departments (PSDs). We inspected seven forces across England and Wales. We reviewed:

- 667 documents
- 616 items of corruption-related intelligence (158 relating to sexual misconduct)
- 236 misconduct and complaint investigations focusing on misogynistic and predatory behaviour
- 725 vetting files (using a panel of subject matter experts)



We also carried out:

- 94 interviews with officers and staff
- 182 focus groups
- reality testing in each force

We produced 35 case studies to illustrate our findings. We also carried out an online survey of police officers, staff, and volunteers across forces in England and Wales. The survey was voluntary, anonymous, and covered areas relating to misogyny and sexual misconduct in the workplace.

We received 11,277 responses to the survey - our highest ever response rate. We further interviewed 42 of the 668 survey respondents who volunteered for this.

## Key findings

We published key findings in the report 'An inspection of vetting, misconduct and misogyny in the police service' in November 2022. They included:

- Police vetting standards are not high enough, and it is too easy for the wrong people to join and stay in the police.

- Police officers are sometimes able to transfer between forces despite a history of concerning intelligence, complaints, or misconduct allegations.
- Incidents, which should have been assessed as gross misconduct, were downgraded to misconduct, or not treated as misconduct at all.
- A culture of misogyny, sexism and predatory behaviour towards female police officers, staff and members of the public was prevalent in all the forces we inspected.

## Recommendations

We made 43 recommendations in the report. A total of 29 were directed at police forces. The others were issued to national organisations including the College of Policing, IOPC and the Home Office.

We also highlighted five areas for improvement. Key themes included making sure forces complete pre-employment checks; using Regulation 13 powers under the *Police Regulations 2003* for underperforming probationary officers more effectively; improving standards of investigation in PSD cases; and establishing working relationships with external agencies and organisations who support vulnerable people.

## Public interest

The media and public response to our inspection showed how interested the public are about the experiences of people working in policing who were shining a spotlight on inappropriate behaviour by colleagues. Our media reach was extensive. We received the highest level of media mentions, interviews, views and impressions we have received for our work to date.

## Rapid review of force progress

In February 2023, an ex-Metropolitan police officer received 36 life sentences after pleading guilty to 85 offences, including rape. The Home Secretary asked us to urgently review the progress forces had made to address our recommendations.

We examined the self-assessments that forces provided to the National Police Chiefs' Council (NPCC) in response to the rapid review. To varying degrees, they offered assurance that our recommendations were being acted upon.

We made enquiries to verify or refute the information in the self-assessments. This established a more accurate and informed picture of progress. We found some forces had overestimated their progress, while others underestimated it. We concluded there had been some improvements but there was still a long way to go.

## Where are we now?

We have worked closely with forces to verify their progress against our recommendations. Most have made significant progress. All forces have:

- adopted the NPCC policy on sexual harassment
- implemented a prejudicial and improper behaviour flag in their PSD recording system
- correctly categorised corruption intelligence in line with the NPCC counter-corruption categories
- started to make better use of Regulation 13 powers

There is still work to do for forces to make sure they are effectively managing notifiable associations and business interests declared by members of the workforce. Furthermore, 15 forces have not yet provided sufficient evidence to verify the recommendation requiring chief constables to review all allegations about prejudicial and improper behaviour where the alleged perpetrator was a police officer or member of staff. A total of 14 forces have still not established effective working relationships with organisations who support vulnerable people and are most likely to become aware of early warning signs of abuse.

## Looking ahead - integrity inspections

We continue to hold forces to account for how effective their arrangements are in these areas. The HMICFRS integrity team have recently started inspections of vetting, counter-corruption, and professional standards arrangements in all forces. We assess how effectively the force vets its workforce, protects the information it holds, and tackles corruption (including potential corruption). We also assess how effectively the force promote high standards of behaviour and investigate public complaints and conduct matters. The content, structure and focus of these inspections reflects the policing landscape in relation to public complaints and police conduct, and the views gathered from external consultation.

The impact of police corruption and misconduct on public trust and confidence is immeasurable. Everyone in policing has a responsibility to keep the public safe. It is no longer acceptable to ignore poor behaviour. Do the right thing if you see behaviour that falls below the standards expected. Call it out. ■

## More information

<https://hmicfrs.justiceinspectorates.gov.uk/publications/>

**Su Wilshire** is an Assistant Portfolio Director at HMICFRS. She leads on vetting and counter-corruption.



## CASE STUDY 4



# Police officer shares sensitive information about an organised crime group

This case was investigated by the force's anti-corruption unit as part of a directed investigation by the IOPC.

Officers went to a domestic abuse incident. A man was arrested for several related offences. His partner was present and was identified as a serving police officer. The officer later disclosed she was in a coercive and controlling relationship with the man.

The man's mobile phone was analysed as part of the investigation into his offences. It revealed he had been sent pictures of sensitive police information by his partner, the serving police officer, on several occasions. An IOPC directed investigation into the actions of the officer began at the same time the man was being investigated for the domestic abuse offences.

On one occasion, the officer had sent a picture of a screen to the man while she was on-duty. It contained confidential information about an ongoing investigation into an organised crime group. The names of people involved were visible in the picture. Some of these individuals were related to the man.

Text messages sent by the officer to the man on the same day included "you can't show anyone and delete it after" and "I'll do it later when less people are in the office". Messages made it clear the officer was aware the man would know the people visible in the picture.

### College of Policing Authorised Professional Practice – Major investigation and public protection

Officers must be able to recognise controlling or coercive behaviour as it can be a warning sign of a risk of future violence towards the victim. Although the conduct may appear low-level, any behaviour or pattern suggestive of controlling or coercive behaviour must be treated seriously and investigated to determine if an offence has been committed under the *Serious Crime Act 2015* (SCA) section 76.

#### More information

[www.college.police.uk/app/major-investigation-and-public-protection/domestic-abuse/context-and-dynamics-domestic-abuse#controlling-or-coercive-behaviour](http://www.college.police.uk/app/major-investigation-and-public-protection/domestic-abuse/context-and-dynamics-domestic-abuse#controlling-or-coercive-behaviour)

The officer's use of police systems was reviewed as part of the directed investigation. One evening while at work the officer accessed a police log several times. The log related to a recent, serious criminal offence. The man texted the officer to ask if anyone had been arrested. The

messages indicated the man would know the people involved. The directed investigation found no legitimate policing purpose for the officer accessing this log.

The directed investigation highlighted that before being able to access police systems, automated messages would appear on the force's computers which referenced the *Computer Misuse Act 1980* and *Data Protection Act 2018*. These messages reminded users of their responsibilities. The officer clicked 'accept' to agree to these responsibilities before proceeding to view and share the sensitive information.

The officer was arrested for corrupt or other improper exercise of police powers and privileges. Her personal mobile phone was seized.

Analysis of the officer's phone revealed further examples of sharing confidential police information with the man. This included names and details of offences of people she had arrested, pictures of crime scenes, work emails and seized drugs.

One text sent by the officer included information about a person that had suffered a serious injury. The officer sent information to the man which included the person's name and year of birth. She asked if the man knew the person.

Another message from the officer notified the man about a planned arrest and the location of it. She invited him to come and watch the arrest take place.

Analysis of the officer's phone also revealed she had shared more information about the organised crime group with a family member of the man, and discussed sensitive details over private messages on social media.

The officer admitted to sending the pictures and messages to the man during a criminal investigation interview. She recognised she was aware that information on police systems should only be checked when there is a genuine policing purpose, and that information should not be disclosed to members of the public.

The directed investigation identified that by sharing sensitive information, the officer could have easily prejudiced an ongoing police investigation into the organised crime group or caused adverse consequences for the people the officer shared information about. The directed investigation also found the officer's actions had potential to undermine public confidence in policing. ■

Call the National Domestic Abuse Helpline if you have been affected by this case and would like support. It is free, confidential and open 24 hours a day on 0808 2000 247. For more information visit <https://refuge.org.uk/>

### KEY QUESTIONS FOR MANAGERS, POLICY MAKERS AND TRAINERS

- What does your force policy say about appropriate use of police-issued devices?
- How do you raise awareness of the importance of officers and staff reporting notifiable associations with people connected to criminal activity?
- How can your systems help remind staff to only access information when they have a clear policing purpose?
- What support do you provide to officers and staff who may have experienced domestic abuse?
- How can you be proactive in recognising the risk of officers and staff who may be vulnerable to corruption, including being involved in a coercive or controlling relationship?

### KEY QUESTIONS FOR POLICE OFFICERS AND STAFF

- What steps should you take if you have a notifiable association?
- Why is it important to you that information on police systems is only accessed when there is a legitimate policing purpose?
- What would you do if you believed a colleague may have a notifiable association or was sharing sensitive police information with a member of the public?
- What warning signs do you look out for to identify potential coercive or controlling behaviour?

### ACTION TAKEN BY THE FORCE

- The force banned the use of WhatsApp on all force-issued electronic devices.

### OUTCOMES FOR THE OFFICERS AND STAFF INVOLVED

The case was referred to the Crown Prosecution Service. The officer was convicted of misconduct in a public office. She received a six month suspended custodial sentence.

The officer was found to have a case to answer for gross misconduct. She faced disciplinary proceedings for breaching the Standards of Professional Behaviour for confidentiality, honesty and integrity.

The officer resigned during the misconduct process. She would have been dismissed without notice had she still been serving. The officer was placed on the barred list.



# Tackling misuse of social media and instant messaging

**Deputy Chief Constable Mark Travis** discusses the progress that has been made to prevent and provide education around inappropriate use of social media and instant messaging in policing.

***“The threats from misusing instant messaging and social media are here to stay, but the work of the national group has ensured those risks are better understood, and that forces have effective guidance on their safe and ethical use.”***

**Deputy Chief Constable Mark Travis**

Issue 40 of Learning the Lessons focused on abuse of position for sexual purpose. In this issue I gave an overview of the then recently formed National Police Chiefs' Council (NPCC) working group for misuse of instant messaging and social media. I can now update on the progress we have made.

Social media is a powerful and convenient engagement tool. But regrettably it presents opportunities for misuse by a minority of the police service. Some of those cases have caused extreme distress to our communities and colleagues in policing.

The IOPC made nine recommendations to police forces nationally about the use of WhatsApp in April 2021. The misuse of instant messaging and social media working group welcomed the recommendations and embedded them within the work we subsequently delivered.

More information: [www.policeconduct.gov.uk/news/nine-national-recommendations-made-regarding-police-officers-use-whatsapp-messaging-system](https://www.policeconduct.gov.uk/news/nine-national-recommendations-made-regarding-police-officers-use-whatsapp-messaging-system)

## National strategy

The working group developed a national strategy on inappropriate use of instant messaging and social media. The strategy was issued to forces by Chief Constable Lauren Poultney, Chair of the National Policing Counter-Corruption Advisory Group (NPCCAG). The strategy was based on the principles of prevention, intelligence, enforcement and engagement.

***“This strategy emphasises our principal desire to prevent such behaviour from occurring in the first instance and to clarify the boundaries of acceptable and unacceptable conduct. It is critical that forces stress the seriousness of this behaviour, educate their workforce to recognise the signs and symptoms and place a heavy emphasis on prevention.”***

**Chief Constable Lauren Poultney**

The group developed and issued a checklist to forces to support the national strategy. It provided specific criteria under the strategy principles. This included advising forces to implement the recommendations made by the IOPC, and tactical options to support workforce conduct.





Problem profile

One of the strategic objectives of our delivery plan was to create an analytical problem profile to help us better understand the risks posed by instant messaging and social media in policing.

Developing the problem profile was a substantial undertaking. We analysed 866 cases of police officers and employees misusing instant messaging and social media. We also gathered insights from data, other case examples and strategic feedback from force leads.

Forces across England and Wales worked with us to provide the exact information we needed, helping us identify substantial learning opportunities and develop our problem profile. This helped identify some key themes we needed to address. They included:

- The varied misuse of instant messaging and social media. Misuse varied from case to case, ranging from poor understanding of account settings, through to cases of gross misconduct and criminality, where misuse facilitated prejudicial and improper behaviours and even abuse of position for a sexual purpose.

- Ethical user habits and access controls. Our findings indicated a significant number of misuse cases were not gross misconduct and were avoidable through organisational education and individual diligence. Technology will continue to develop at pace, in particular artificial intelligence, and we considered it impractical for forces to adapt to every new app. We needed to focus on forces embedding ethical user habits.

We developed the FIREWALL mnemonic to support colleagues in their use of social media. This can be easily integrated into training and internal communication strategies. FIREWALL outlines good user habits in relation to social media and instant messaging. Forces can integrate this into training and internal communication strategies.

The working group developed additional products for forces to use in their training. These include infographics and a training video to embed learning.

More information: [www.youtube.com/watch?v=n5UdFmmlXLo](https://www.youtube.com/watch?v=n5UdFmmlXLo)



Photo: Alamy

NPCC Instant messaging and social media. Ethical principles and good user habits	
FIREWALL	
F	<b>Friend</b> only people you know in your personal life and not those you met through your policework. Avoid identifying yourself or others as members of the police service or giving indications of your role within policing (don't use police uniform or insignia).
I	<b>Information</b> from your policing role must never be photographed, recorded or shared without a policing purpose and authorisation. Specific policing matters should only be mentioned on social media or instant messaging when in line with the force's social media policy - and remember your duties under the <i>Criminal Prosecutions and Investigations Act (CPIA), 1996</i>
R	<b>Respect</b> others and do not engage with hostile or controversial content which could be used to compromise your integrity, objectivity or otherwise bring discredit upon policing. The right to private life is not absolute.
E	<b>Ethical</b> use is critical. Do not abuse your position or rank in policing to form inappropriate relationships, or for any other form of gain.
W	<b>Wait</b> before posting or messaging anything in haste. Extra consideration will help to prevent regrettable or compromising behaviour. Consider whether content you intend to be humorous may be considered inappropriate for someone in the trusted role of policing.
A	<b>Ask</b> for help or advice if you need it. Supervisors or others within the organisation can help, but they can't do so unless you let them know.
L	<b>Learn</b> from the guidance, policies, best practice and conduct case outcomes which are there to prevent you from putting yourself in a position of vulnerability. Most issues arising from the misuse of social media or instant messaging are completely avoidable by learning good habits.
L	<b>Lawfulness</b> - remember your duties as a member of the police community. This includes challenging and reporting improper conduct (overtly or anonymously) and recognising criminality when you see it. Do not forward any concerning material.

WhatsApp on force-issued devices

WhatsApp is the dominant messaging application for many people. However, it comes with risks for policing, including the potential breach of the *Criminal Procedure and Investigations Act 1996* (CPIA).

The working group provided an analytical briefing to Chief Constable Lauren Poultney in December 2023 on the use of WhatsApp in police forces across England and Wales. The briefing acknowledged the risks of

WhatsApp, as well as its significant benefits. These included supporting police negotiators during rapid contact in live incidents and helping the National Rural Crime Unit to engage with isolated members of the community.

Our briefing concluded by recommending that forces that did not use WhatsApp already should maintain that position and focus on achieving engagement benefits through other means. We made recommendations to forces who already used WhatsApp:

- Incorporate the IOPC's nine WhatsApp recommendations in rationales and risk-mitigation plans.
- Develop supervisor-controlled, custom-built devices with pre-defined settings and content downloads for CPIA and audit retention.

Chief Constable Lauren Poultney supported these recommendations. She wrote to all Chief Constables in April 2024 advising them of the findings of our analysis of the review of WhatsApp use in forces and our recommendations.

Looking ahead

The misuse of instant messaging and social media working group are continuing to build on our work to date. We continue to actively scan for innovative ways to protect community trust and confidence. A national project is underway to help us collect a volume of data from misuse of social media and instant messaging cases. This will support strategic leads and practitioners in counter-corruption units.

We are also alive to the emerging risks associated with artificial intelligence, some of which will likely manifest through social media and instant messaging. We will work with colleagues and specialist advisors across the criminal justice system to tackle those risks.

The ethical expectations of those who work in policing are clear and unambiguous. Our commitment to our communities is that we will continue to do our utmost to protect the consent to police. ■



**Deputy Chief Constable Mark Travis**, South Wales Police is the sexual misconduct lead for the National Police Chiefs' Council.



## CASE STUDY 5



# Failure to report and challenge an officer's relationship with victim-survivor of domestic abuse

**This case was independently investigated by the IOPC.**

A woman called the police to report that her ex-partner had been harassing her. The woman was known to the police as having vulnerabilities, including experiencing mental ill health. She had also made previous domestic abuse reports.

Police officer A went to the woman's house to take a statement. The woman told the officer she was friends with sergeant B and constable C who worked for the same police force. Both had suggested she report the harassment to the police.

Officer A gave the woman his work contact details in case she needed to contact him. The woman contacted officer A to thank him for his support in the weeks following the incident. Officer A responded and gave follow-up advice to the woman on the domestic incident.

During the IOPC investigation, the woman said she had told her policing friends, sergeant B and constable C, that she thought the officer that came to her house was "fit". In an IOPC interview, sergeant B admitted she knew the woman was referring to officer A at the time, but said she did not know if they had met while officer A was on-duty.

This contradicted the woman and officer A's statements which indicated sergeant B was aware they had met while officer A was working.

A month after the officer went to the woman's house, sergeant B added officer A to a WhatsApp group using her personal phone. Sergeant B was asked about the WhatsApp group in an IOPC interview. She said the group was to support people during the pandemic. The participants in the group were all police officers, except for one member of the public - the woman who reported the harassment of her ex-partner.

Sergeant B said she added the woman because she worked in a sector that provided support to people. She denied the WhatsApp group was specifically for the police. However, phone evidence showed internal policing matters were discussed between participants. The IOPC investigation found sergeant B's decision to include a member of the public in the WhatsApp group "wholly inappropriate".

The woman introduced herself in the WhatsApp

group and sent pictures of herself. Officer A would have recognised her after working on her domestic abuse report.

Officer A and the woman spoke through the WhatsApp group and arranged to meet because she offered to bake him a cake. Officer A collected the cake from the woman's house during a work break. Officer A said he thought this contact was "purely social, as his policing involvement with her case was over."

Officer A transferred teams shortly after and sergeant B became his supervisor. Officer A told the IOPC that he regularly spoke to sergeant B about the woman and their growing relationship.

### **G College of Policing Mental Health Authorised Professional Practice (APP): Guidance for ethical and professional behaviour in policing**

If we are a supervisor or manager, we will:

- act as role models of professional behaviour
- support our staff to carry out their professional duties correctly
- challenge and address any unprofessional behaviour and report it in line with force policies
- assess, take positive action or otherwise appropriately escalate any report of unprofessional behaviour or wrongdoing made by someone for whom we are responsible

#### **More information**

[www.college.police.uk/ethics/code-of-ethics/guidance](http://www.college.police.uk/ethics/code-of-ethics/guidance)

The woman and officer A developed a sexual relationship in the following months. Phone evidence placed officer A at the woman's house numerous times when off-duty. Officer A admitted to visiting the woman several times "in a social capacity". This was in breach of force policy which stated 'even when a policing relationship has ended it does not support officers entering into relationships with people they have met through the course of their duties.'







The woman continued to talk with sergeant B about her relationship with officer A during this period.

Force training records showed that both officer A and sergeant B had completed training on abuse of position for sexual purpose and reporting of inappropriate relationships. The training used an example of a corrupt act as being involved in a case of domestic abuse and then beginning a relationship with the victim-survivor. Despite this, officer A and sergeant B failed to report the relationship to the force.

Officer A began living with the woman several months after they had first met. Officer A still did not disclose the relationship or change in living situation to the force. During this time, officer A and the woman attended a gathering at sergeant B's house. Both officer A and the woman stated they acted as a couple at the gathering and the woman jokingly referred to officer A as her "lodger".

At this point, sergeant B told officer A that she would need to report the relationship to the force vetting department as officer A had been staying with the woman for a while. Sergeant B claimed during the IOPC investigation that she called vetting to report that the officer was living with a victim-survivor of domestic abuse and to ask for advice.

However, notes from vetting indicated that sergeant

**“ Sergeant B did not disclose that the woman was a victim-survivor of domestic abuse, or the full details of the situation ”**

**KEY QUESTIONS FOR MANAGERS, POLICY MAKERS AND TRAINERS**

- What guidance and training do you have to support line managers to challenge and report inappropriate relationships?
- How do you encourage officers and staff to challenge and report inappropriate relationships they may become aware of?
- How do you monitor the effectiveness of abuse of position training to make sure officers and staff are aware of professional boundaries in their work?
- What policies and guidance do you have on the use of personal devices to discuss work matters while on or off-duty?

**KEY QUESTIONS FOR POLICE OFFICERS AND STAFF**

- What steps would you take if you were concerned about an inappropriate relationship between a colleague and member of the public?
- How do you familiarise yourself with national guidance on the use of instant messaging (such as WhatsApp) while on or off-duty?

**OUTCOMES FOR THE OFFICERS AND STAFF INVOLVED**

**Officer A was found to have a case to answer for gross misconduct. He faced disciplinary proceedings for entering a relationship with a victim-survivor of crime he met through his duties, and failure to declare his relationship to the force.**

**Sergeant B and constable C were found to have a case to answer for gross misconduct. They faced disciplinary proceedings for breaching the Standards of Professional Behaviour for failing to challenge and report improper conduct. Gross misconduct was not proven for constable C. However, she resigned from the force while under investigation.**

**Gross misconduct was proven for both officer A and sergeant B. They were dismissed without notice. Officer A and sergeant B were placed on the barred list.**

B did not disclose that the woman was a victim-survivor of domestic abuse, or the full details of the situation. Sergeant B only reported that officer A had changed living circumstances and was staying with various friends or acquaintances. The vetting department later confirmed that the matter would have been escalated to sergeant B's superiors if she had reported that officer A was living with someone he had met while on-duty.

The IOPC investigation concluded that sergeant B had known about the relationship between officer A and the woman for some time before reporting it. The force's notifiable associations policy and the Code of Ethics outline that sergeant B had an increased level of responsibility to challenge improper behaviour as a supervisor. Therefore, the relationship should have been reported to vetting immediately.

Officer A was arrested by IOPC investigators on suspicion of misconduct and corrupt or otherwise improper exercise of police powers. ■

Call the National Domestic Abuse Helpline if you have been affected by this case and would like support. It is free, confidential and open 24 hours a day on 0808 2000 247. For more information visit <https://refuge.org.uk/>



# CrimeStoppers.

Speak up. Stay safe.

## Tackling police corruption head on with Crimestoppers' new anti-corruption reporting service

**Mick Duthie** discusses how a collaboration between Crimestoppers and the Metropolitan Police Service led to the creation of the police anti-corruption and abuse reporting service launched this year.

Policing exists to keep the public safe from the harm caused by crime. That was the purpose when a bill passed through Parliament in 1829 establishing the first modern police force - the Metropolitan Police.

Nearly 200 years on and there has been a huge shift that has threatened policing's future – not just in London, but across the whole of the UK.

Most police officers do a fantastic job under challenging circumstances. They protect the public and hold criminals to account. However, everyone in law enforcement knows about the depressing number of serving officers who have been found guilty of murder, rape, domestic violence and other horrendous crimes.

Negative stories in the news and the understandable fury in response from the public reveals an underlying and persistent fear: that the police cannot be trusted.

### Policing by consent

With violence and abuse being perpetrated by some of the very people who have been trusted to protect society and uphold the law, leading thinkers focused on what to do next. The key question: how to root out police corruption and restore public trust?

At a time of significant criticism towards the Metropolitan Police, they decided to be among the first to face up to the challenge.

The Metropolitan Police started by enhancing their anti-corruption and abuse command. As part of their plan, they commissioned Crimestoppers to run their anti-corruption and abuse hotline. This was launched in November 2022.

Crimestoppers – an independent charity – was lined up to play a crucial part. We have built up

public trust over decades, taking and passing on information about potential crimes while guaranteeing complete anonymity.

The new Metropolitan Police hotline was public-facing. It was designed for those who may be reluctant or refuse to report their experience or knowledge of corruption, abuse or wrongdoing directly to the police force involved. This is particularly important in certain types of cases where trust in policing may have been undermined. The hotline provided an option for members of the public to make their initial report to civilian staff at our charity's 24/7 UK contact centre.

Reports of abusive or corrupt officers were being taken and passed on for investigation within hours of launch. The Metropolitan Police were sifting through hundreds of reports within the first few months. They began to use the information to tackle police corruption head-on.

Many of these reports may never have been made without Crimestoppers.

### National expansion

The hotline was proving a useful tool for the Metropolitan Police. But Crimestoppers were also passing on reports that were coming through directed at other police forces.

This helped focus minds on creating a national service available to the public wherever they lived in the UK.

The National Police Chiefs' Council and Association of Police and Crime Commissioners commissioned Crimestoppers to develop a national service for reporting corrupt officers and staff. The national police anti-corruption and abuse reporting service was launched in March 2024. Our CEO Mark Hallas said:

## Corruption or abuse within policing?

If you suspect a police officer, staff member or volunteer of corruption or serious abuse, tell the **Police Anti-Corruption and Abuse Reporting Service**.

**You can stay completely anonymous.**

Visit: [reportpoliceabuse.co.uk](https://reportpoliceabuse.co.uk)  
Or call: 0800 085 0000



"We all share the same aim of wanting to see dangerous and abusive police officers and staff rooted out. The public deserves a safe and transparent policing environment that they can trust. Crucially, the launch of this service gives people an option to make that initial report via our independent charity and not directly to the police. Those with serious allegations who have previously stayed silent will have greater confidence to come forward."

### Countering criticism – promoting the benefits

Policing works best when the public have confidence in the service and believe law enforcement will work hard to protect them.

Equally, abusive officers who may be financially or sexually motivated, or by hatred or discrimination, must be dealt with effectively.

There were some views among police officers and staff that Crimestoppers is meant for the public to report crime, not to report on the police.

To address this, we continue to emphasise in our communications that this service is to protect the majority of decent and committed police officers, and not to attack them. By taking tip-offs from the public, the police will be better able to identify and pursue those who aim to abuse their position of authority for personal gain.

Anonymity is the primary guarantee, as with other Crimestoppers services. However, people can opt-in and give their personal contact details if they consent

to being contacted by the internal investigation team at the relevant force.

Once a report has been shared with the police, they will record the information we have provided, and typically an investigation will be launched. Safeguarding is a primary concern to help identify anyone who is at risk or in danger.

### Crimestoppers on your side

The battle to convince both the public and the police to challenge bad behaviour or step forward when they spot a red flag cannot be done overnight.

Speaking up requires a cultural shift and it will take time. Crimestoppers now gives people a safe, alternative route to pass on what they know.

Our charity's involvement is designed to help protect not just the public, but the majority of police officers and staff who go about their duty with integrity and professionalism. ■

### More information:

<https://crimestoppers-uk.org/news-campaigns/campaigns/the-police-anti-corruption-and-abuse-reporting-service>



**Mick Duthie** is the Director of Operations at Crimestoppers. He was formerly Head of Homicide Command at the Metropolitan Police.



## CASE STUDY 6



# Disposing of speeding tickets and disclosing information to the public

**This case was investigated by the force's anti-corruption unit as part of a directed investigation by the IOPC.**

A police force investigated a burglary. The following day, the police received intelligence that two men had been assaulted and accused of committing the burglary by the burglary victim. The two men were not previously known to the victim.

The burglary victim was arrested for assault. The police examined the burglary victim's phone to understand how he had obtained the two men's details. The police discovered two screenshots of police systems on the burglary victim's phone. They showed personal details of the two men sent via WhatsApp by a friend. The screenshots had originally been sent to the burglary victim's friend by a police employee.

Examination of the screenshots revealed they had been taken from two police systems used by a roads policing team of another police service. This force launched an investigation.

Analysis identified one member of police staff, employee A, who had been using both systems at the time the screenshots were taken.

Other messages sent by the friend to the burglary victim were analysed. In one message, the friend told the burglary victim if he was ever "caught speeding" to let him know "straight away". This implied his relationship with the employee A could help any speeding offences be removed.

An IOPC directed investigation was established after the message was identified to explore potential serious corruption within the force's roads policing team which handled speeding offences.

The directed investigation identified three police employees from the roads policing team suspected of criminal activity. This included employee A who was suspected of sending the screenshots, and two

other staff members, employee B and C. The directed investigation was split into two strands.

The first strand of the directed investigation examined the actions of employee A who was suspected of sharing screenshots of police systems. The directed investigation further analysed employee A's use of police systems. It revealed she had accessed the details of the two assault victims without a policing purpose.

The directed investigation also identified employee A had been in contact with another man who was also friends with the burglary victim. They had asked for information about the identities of the burglary suspects. This man was revealed to be employee A's partner.

Employee A, her partner, the burglary victim, and the friend of the burglary victim who sent on the screenshots of police systems were arrested for conspiracy to commit misconduct in public office, conspiracy to commit offences under data protection, and conspiracy to pervert the course of justice.

### **G Crown Prosecution Service: Misconduct in public office**

The offence concerns serious willful abuse or neglect of the power or responsibilities of the public office held. There must be a direct link between the misconduct and an abuse of those powers or responsibilities.

#### **More information**

[www.cps.gov.uk/legal-guidance/misconduct-public-office](http://www.cps.gov.uk/legal-guidance/misconduct-public-office)

Employee A admitted during interview that the sharing of police data was a one-off and she was unaware what the information would be used for.

The second strand of the directed investigation

examined the wider actions of the roads policing team. An examination of employee A's phone highlighted that she had been in contact with more than 30 members of the public about disposing of road traffic offences, including deleting speeding offences from force systems. She had also removed offences from the system relating to associates of her partner.

Phone records also revealed that employees B and C had spoken with employee A about disposing of speeding offences for their friends. Employees B and C were arrested.

Both acknowledged sending car registration numbers to their colleague for her to check on the police system during interview. They denied their intention was for her to dispose of any speeding tickets linked to the registration.

This explanation was challenged during the directed investigation based on text messages which suggested employee B was aware their colleague was disposing of speeding offences linked to their friends. The directed investigation discovered employee C had been involved in one isolated case. ■

### **KEY QUESTIONS FOR MANAGERS, POLICY MAKERS AND TRAINERS**

- How do you proactively monitor or audit police systems to identify potential unauthorised use?
- How do your policies, guidance and training reinforce the importance of not disclosing sensitive information to the public, including to family and friends?
- How do your processes and systems help identify potentially concerning patterns of behaviour at work, including in teams with the ability to remove or dispose of police information?

### **KEY QUESTIONS FOR POLICE OFFICERS AND STAFF**

- How well do you understand the process in your force to raise concerns if you suspected a colleague was engaging in criminal activity?
- Why is it important to you that the police are held to the highest standards of honesty and integrity?

### **ACTION TAKEN BY THE FORCE**

The force is currently reviewing processes and practices within their road safety team to understand the influence the team members had over prosecuting road traffic offences. This review aims to identify why the team members were not subject to internal auditing which may have revealed the corruption sooner.

### **OUTCOMES FOR THE OFFICERS AND STAFF INVOLVED**

The case was referred to the Crown Prosecution Service. Employee A was convicted of several offences including misconduct in public office and conspiring to pervert the course of justice. She received a custodial sentence.

Employee B was convicted of conspiracy to commit misconduct in public office. He received a custodial sentence.

Employees A and B were also found to have a case to answer for gross misconduct. They faced disciplinary proceedings for breaching the Standards of Professional Behaviours for honesty and integrity, duties and responsibilities, confidentiality and discreditable conduct. Employee A resigned before the misconduct process. She would have faced disciplinary proceedings had she still been serving. Employee B was dismissed without notice and placed on the barred list.

Employee C was found to have a case to answer for misconduct. He faced disciplinary proceedings for breaching the Standards of Professional Behaviour of honesty and integrity. Employee C resigned during the misconduct process. He would have received a written warning had he still been serving.



# National Crime Agency's Threat Assessment: the corruption threat to UK law enforcement

**Daniel Morton** introduces key findings from the recent National Threat Assessment, identifying the key corruption threats facing police forces in the UK today.

UK law enforcement, including policing, is a high-risk sector for corruption. Corruption in policing is defined by the National Police Counter-Corruption Advisory Group (NPCCAG) as 'the abuse of entrusted power or position for any benefit or to avoid a detriment, for either individuals or organisations, and usually breaches laws, policies and/or standards of professional behaviour'.

The purpose of the national assessment, compiled by the National Crime Agency is to identify key corruption threats facing UK policing, and to inform strategic priorities and responses of the NPCCAG. It aims to address the following questions using annual data collection and assessments from forces and agencies:

- What is the nature and scale of the corruption threat facing policing?
- What are the corruption priorities, emerging threats, and associated enablers and vulnerabilities to be considered against current and future responses?

There are 12 NPCCAG-defined corruption categories which apply to how anti-corruption

**“Corrupt insiders pose risks to the public, colleagues, the integrity, reputation and functions of their organisation, and policing as a whole”**

units (ACUs) record intelligence. This influences how the threats are analysed using the data at force, regional and national level. Categories include specific corruption events, as well as corruption vulnerabilities.

Corrupt insiders pose risks to the public, colleagues, the integrity, reputation and functions of their organisation, and policing as a whole. ACUs across the UK continue to face the same range of priority and emerging threats shown in the STUDIOSB image.

Countering these threats is central to the long-term objectives of the National Police Chiefs' Council (NPCC). These include protecting the public by reducing the threat of corruption; enhancing policing's ability to prevent and detect crime by maintaining high professional standards and integrity; and enhancing public confidence in policing.



to keep abreast of the potential repercussions for corruption threats.

- Corrupt insiders in policing that act on behalf of other people or groups tend to do so for criminals (typically low-level offenders) that they have an existing association with. This can include family, social or romantic connections. Insiders are rarely targeted and blackmailed to act against their will. Instead, they largely engage in corruption based on mutual interest, including financial and material rewards. While less common, insiders acting on behalf of higher level serious and organised criminals pose disproportionately high risks to policing and its operations, officials, and the public it seeks to protect. Policing continues to enhance its efforts to identify associations with potentially compromising individuals during recruitment, vetting and security appraisal processes.
- Corrupt insiders in policing who assist serious and organised criminals are predominantly involved in leaking valuable information that they have access to in their role. Policing continues to review and enhance its systems auditing frameworks to identify and evidence the abuse of such privileges.
- Economic pressures can contribute to corruption vulnerabilities for police officers and staff. They may engage in workplace theft and fraud, including falsifying working times and expense claims or engaging in unauthorised business interests. Officers have higher capability and opportunity to do so if they can abuse working arrangements including lone working and working from home. Policing continues to develop control measures to detect such activity both reactively (following allegations) and proactively.

## Ongoing work

NPCC portfolio leads and working groups are established for the priority threats. Good practice guides are updated and shared nationally outlining prevention, intelligence, enforcement, and engagement strategies. ACUs continue to develop control measures to prevent and detect corruption; mindful of the corruption capability, opportunity and motivation of those seeking to abuse their position within policing. These checklists and associated guidance can be provided through individual force ACUs. ■

**Daniel Morton** is a Lead Intelligence Analyst working in the Directorate of Professional Standards at the Metropolitan Police Service. He is Chair of the national counter-corruption analyst and researcher group.

## Key findings

The National Threat Assessment for 2023 highlighted five key findings:

- Sexual misconduct is the highest anti-corruption priority nationwide. The introduction of a new range of offences and indicative behaviours in 2023 has enabled ACUs to gather more information, respond to more allegations, and manage a wider range of associated risks to enhance their efforts to counter this high-profile, high-harm corruption threat. This includes countering misogyny in the workplace and abuse of position for sexual purpose against members of the public. This is aligned with the UK Government's commitment to tackling violence against women and girls.
- It is expected that social media and messaging apps will become more significant in generating corruption risks. They will enable the activities of corrupt insiders through continued technological developments and associated societal norms. These social networking and communications platforms enhance corruption capabilities, opportunities and motivations in the same way they do for criminal activity by members of the public. Policing must monitor the technological landscape



CASE STUDY 7



Association with an organised crime group and misuse of police systems

This case was investigated by the force’s anti-corruption unit as part of a directed investigation by the IOPC.

A police force became aware that an employee working in their exploitation team may have associations with known organised crime group (OCG) members involved in supplying controlled drugs.

An IOPC directed investigation was established. The employee’s personal phone was examined during the investigation. It revealed that the employee had phone calls with two known associates of the OCG on the day the police executed several warrants linked to the OCG. The details of these calls are unknown.

An audit was completed of force systems to understand what records the employee had accessed. The employee had accessed custody records of several OCG members on the day the warrants were executed.

The employee had contacted one of the men associated with the OCG and received a phone call from another. The employee was arrested following these discoveries.

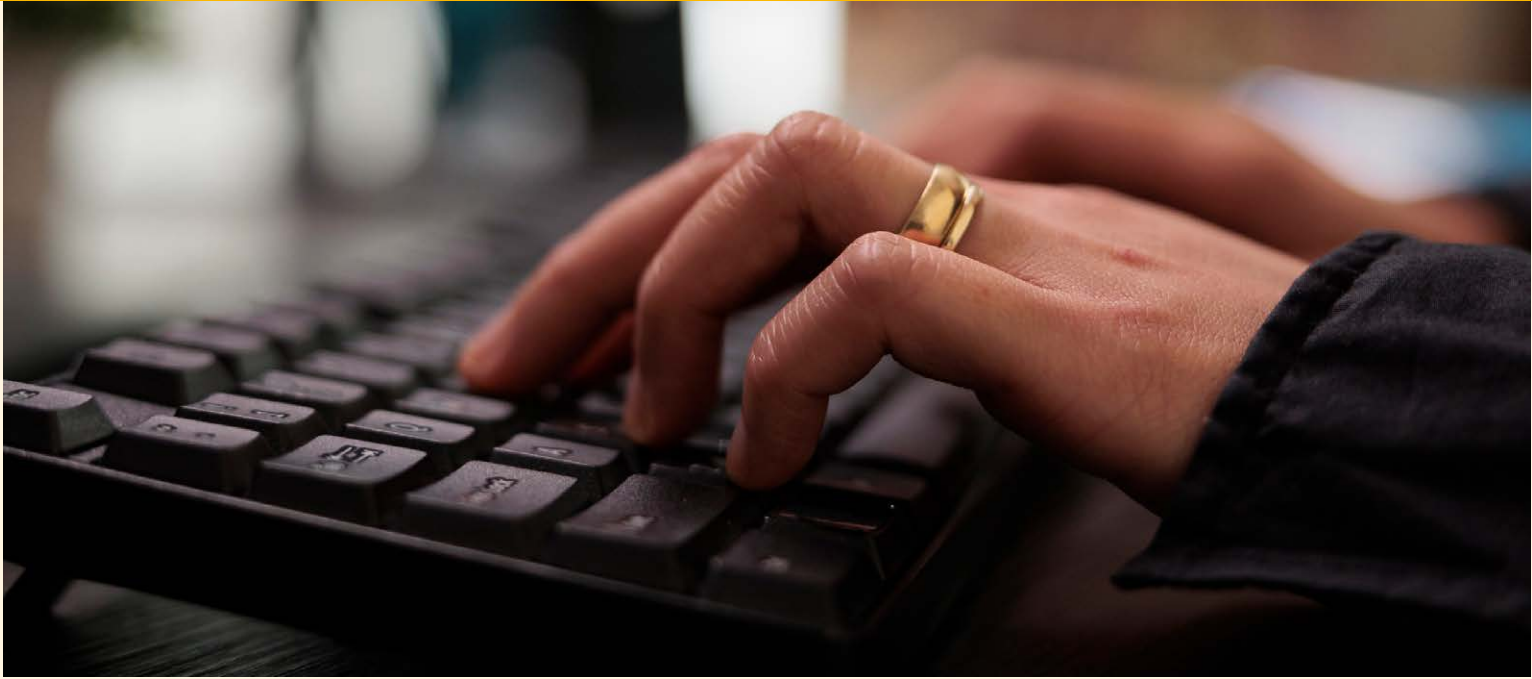
The employee was working from home when she was arrested. Officers could smell drugs when they arrived. The employee tried to dispose of a class B drug before officers seized it.

The employee was arrested on suspicion of misconduct in a public office, breach of data protection, computer misuse, perverting the course of justice, and possession of cannabis.

The employee was asked during interview about her association with OCG members. She confirmed on occasion she had been at social events when OCG members had been present, but she had not engaged with them. She also noted that she had encountered a family member of someone in the OCG through her policing work.

The employee was asked about the phone calls with OCG associates. She noted she did not have a relationship with the OCG associates, but she had spoken to a family member of one recently.

The police spoke with the OCG associates, who stated the employee had not passed them any information. They said they were unaware she worked for the police.



The directed investigation concluded that the employee’s reasons for contacting the OCG associates was suspicious. However, there was no evidence to show police information had been shared.

The employee was also asked why she had accessed the custody records of the OCG members on the day warrants were executed. The employee said she was unaware there was an ongoing operation linked to these people. She said that as part of her role she checked custody records to “ensure that the children she deals with have not been arrested”. She denied she had been asked to carry out the searches on the police system by the OCG.

College of Policing: Guidance for ethical and professional behaviour in policing

We understand the importance of managing information that comes into our possession through our police work. We understand that we have the responsibility to share some information when it is needed and to protect other information from misuse.

More information  
[www.college.police.uk/ethics/code-of-ethics/guidance](http://www.college.police.uk/ethics/code-of-ethics/guidance)

The directed investigation found “some evidence” the employee did have a policing purpose for viewing the custody records to make sure no young people had been arrested. This information could have been established through the checks she carried out.

The employee was also asked during interview

about the class B drugs seized during her arrest. She admitted to possessing the drugs. She said her friend had given them to her to help with anxiety and sleeping.

The directed investigation also examined further occasions when the employee had accessed information on police systems without a clear policing purpose. On one occasion, the employee had accessed the police records of a person related an OCG associate. The police spoke with this person during the directed investigation to see if she had been given any information. This person confirmed that the employee had disclosed to her that she had been reported for a lockdown breach.

College of Policing guidance on outcomes in police misconduct proceedings

**Data protection and misuse**  
Under no circumstances should anyone access or use police information for personal benefit. Personal reasons for accessing confidential police information, such as general curiosity or a desire to check on criminal activity near an officer’s home, are not acceptable. If an officer is accessing police information not available to the general public, there should always be a specific and proper policing purpose for doing so.

More information  
[www.college.police.uk/article/outcomes-police-misconduct-proceedings-updated-guidance](http://www.college.police.uk/article/outcomes-police-misconduct-proceedings-updated-guidance)

The employee was found to have viewed several lockdown breaches on police systems. The employee

rationalised that she had viewed them in error, or by mis-typing the incident number.

The employee reiterated she “did not pass any confidential police information” to known OCG members. The directed investigation concluded there was no evidence to confirm the employee did share confidential police information with known OCG members.

KEY QUESTIONS FOR MANAGERS, POLICY MAKERS AND TRAINERS

- How can audits or dip-sampling help you to make sure officers and staff are only accessing and using the information available in police systems for legitimate policing purposes?
- How do you support officers and staff through policies, guidance and training to understand when they should report notifiable associations?
- How do you support officers and staff to understand how to apply the Standards of Professional Behaviour and Code of Ethics?

KEY QUESTIONS FOR POLICE OFFICERS AND STAFF

- How could you improve your confidence in understanding your force’s notifiable associations policy or process?
- Why is it important that potential notifiable associations are reported in a timely manner?

OUTCOMES FOR THE OFFICERS AND STAFF INVOLVED

The employee was found to have a case to answer for gross misconduct. She faced disciplinary proceedings for breaching the Standards of Professional Behaviour for discreditable conduct, confidentiality, honesty and integrity and instructions.

The employee resigned during the misconduct process. She would have been dismissed without notice had she still been serving. The employee was placed on the barred list.

The case was not referred to the Crown Prosecution Service because the directed investigation did not have sufficient evidence to support a referral.





# Prevention and early intervention at Lancashire Constabulary

**Detective Chief Inspector Peter Reil** discusses how Lancashire Constabulary's anti-corruption unit aims to educate and empower officers and staff.

Lancashire Constabulary employs more than 6,250 people. This includes more than 3,600 police officers including the special constabulary, 2,500 police staff, and 100 volunteers. A total of 35% of our police officers have less than five years' service.

Lancashire Constabulary's anti-corruption unit (ACU) operate as the proactive arm of the professional standards department. Our role is to identify and investigate corruption-related matters within the police service.

In addition, we aim to effectively engage with and educate Lancashire Constabulary's employees to prevent police corruption.

Our key thematic areas of concern and strategic priorities are:

- Early identification and prevention of police-perpetrated sexual misconduct.
- Making sure information is disclosed correctly and there is proactive identification of misuse of force systems.
- Recognising employee vulnerability, including identifying inappropriate or reportable associations and business interests.

## Education

We recognise education is key both internally and externally. Our ACU has a 12 month engagement strategy for officers and staff to raise awareness and understanding of key messages around sexual

misconduct, system misuse and the risk of corruption from external influences.

We also provide bespoke presentations to all new police officers, community support officers and control room operators. These include real case studies investigated by our ACU which emphasise potential vulnerabilities and behaviour that is unacceptable for representatives of Lancashire Constabulary.

We also continue to monitor emerging patterns and trends of concern and react with tailored inputs to address the problem. This has led to an expansion of presentations to our development unit tutors who work closely with student officers. We recognise they have significant influence in setting the culture for new employees. Tutors can help us set the high standards expected of our staff, both on and off-duty, from the day they join the policing family.

**“The standard you walk past is the standard you accept”**

**Lieutenant-General Morrison**

We also work closely with our organisational and learning and development departments. This has allowed us to embed ACU inputs into detective inspector, sergeant and constable courses. We have also embedded key ACU messages into our Lancashire Constabulary's 'leading the way' workshops for aspiring leaders.

By focusing on roles which have the greatest influence

to set the right tone and culture in policing, we have set the expectations of future supervisors. We continue to raise awareness of potential vulnerabilities for corruption and warning signs for concerning behaviours.

## Education beyond the gates

Our work cannot stop at the gates of our police stations. We recognise the key role played by our partner agencies in the fight against corruption and protecting vulnerable people in our communities.

Lancashire Constabulary's ACU have joined up with many external agencies and stakeholders to present bespoke inputs to social workers, independent sexual violence advisers, and others who work with vulnerable people. We do this to raise awareness of warning signs, including how police abuse of position can start, and the standards stakeholders should expect from policing. We will continue engaging with external agencies, recognising the importance of keeping our stakeholders abreast of emerging trends and threats.

This collaborative approach allows us to work together to act decisively and quickly to identify and respond to abuses of position or threats to vulnerable people. We continue to share lessons learned.

## Integrity health checks

We want to drive key messages home to Lancashire Constabulary's managers and their teams. As such, we have introduced 'integrity health checks' within performance development reviews (PDRs). Integrity health checks make sure line managers have regular one-to-one discussions with their teams to discuss areas of risk, and to serve reminders on policing standards and the need to declare changes in circumstances. Integrity health checks cover:

- notification of criminal offences
- financial advice
- gifts and gratuities
- business interests
- reportable associations
- inappropriate relationships in the workplace
- sexual harassment and bullying
- misuse of systems
- professional standards of behaviour
- Code of Ethics

Completing integrity health checks allows our line managers to identify potential risks. This can result in early identification of issues, including cultural ones. Combined with our work with our organisational

learning teams, integrity health checks provide staff with regular opportunities to voice concerns and seek out support. They also serve to remind all our staff of the legislation and standards we are bound by.

## Mobile technology

Working in policing requires us to be agile and efficient. Access to information on police systems is critical to this. The more efficient we become, the greater access our staff have to police systems and confidential information at their fingertips. This is a risk recognised by our ACU. In conjunction with our engagement plan with officers and staff, we make sure when new mobile devices are issued, we clearly remind officers and staff what is an acceptable use of police systems and what is not. Conditions of use are outlined as soon as devices are provided, and officers and staff must sign to agree to adhering to those conditions. Staff also receive a small card, designed to stay with the mobile device, to remind users of what a policing purpose is for accessing information. All enquiries made on force systems must be for legitimate policing purposes during a person's duties. This relates to activity concerned with:

- protecting life and property
- preserving order
- preventing the commission of offences
- bringing offenders to justice
- any duty or responsibility of the police arising from common or statute law
- administration and management of the Constabulary

## Prevention and early intervention matters

Our vision is to keep our communities and the public safe. Abuses of position by the police are rare, but it is vital we remain proactive to highlight and deter this behaviour at the earliest opportunity. The effects of abuse of position have a devastating effect on victim-survivors and public confidence in the police service.

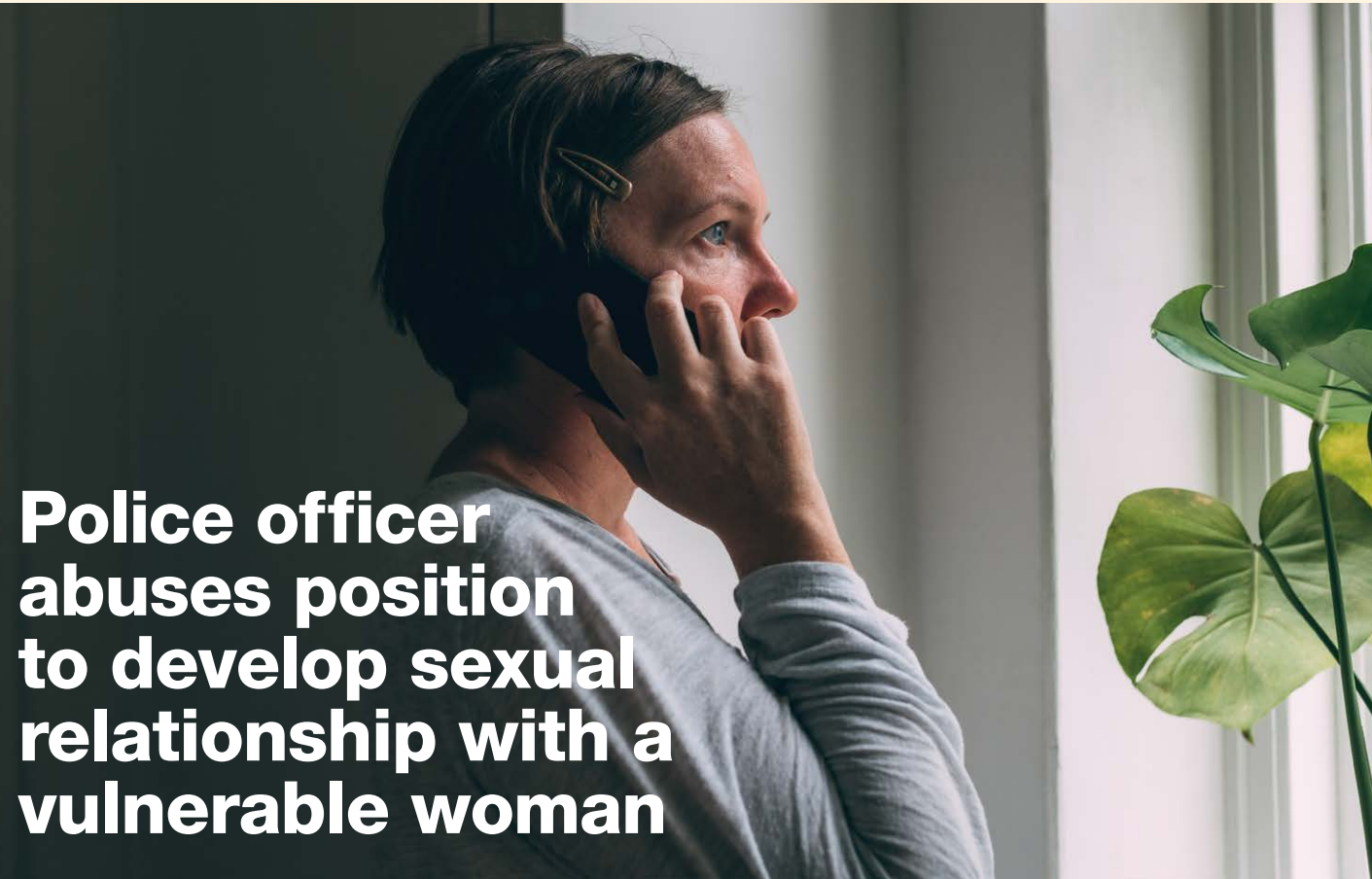
We recognise the impact of exploitation of people who are vulnerable and any abuse of our privileged position. Corrupt behaviour must be dealt with effectively to make sure the public's view of the police service is a positive one, and that trust and confidence is maintained. ■

**Detective Chief Inspector Peter Reil** is the Head of Lancashire Constabulary's Anti-Corruption Unit.





CASE STUDY 8



Police officer abuses position to develop sexual relationship with a vulnerable woman

**This case was independently investigated by the IOPC.**

A woman contacted the police to report several previously unreported domestic incidents relating to her ex-partner. The woman also noted that several years earlier she had been in a relationship with a serving police officer who she had met during the course of the officer's duties.

The officer who received the report immediately informed her supervisor.

It was established during the IOPC investigation that the officer, along with several other officers, had attended a domestic incident involving the woman and her ex-partner. The officer had completed a risk assessment with the woman and recorded that the woman did not want to take the incident any further.

The officer exchanged text messages with the woman in the days that followed. The officer first sent the woman a message to introduce himself and check on her. Texts then became more informal. They arranged to meet at the woman's home after a few days of communication. The officer and woman began a sexual relationship during this first meeting.

The woman later described the relationship as consensual but reflected that she *"wasn't thinking straight"* and the relationship with the officer was not right. The woman was asked if she considered herself a

vulnerable person. She said *"not at the time... but 100 percent, now"*.

College of Policing Code of Ethics - Guidance for ethical and professional behaviour in policing

Individuals may not be – or may feel they are not – free to choose whether they engage with us, they may feel under compulsion to do so, or they may be in a vulnerable state (for example, distressed or confused). We acknowledge that this power imbalance should not be regarded negatively, but as a fundamental factor in such relationships.

**More information**  
[www.college.police.uk/ethics/code-of-ethics/guidance](http://www.college.police.uk/ethics/code-of-ethics/guidance)

Early in the relationship, the officer would go to the woman's house. They would go out drinking together in the local area but their relationship was never "public". During the IOPC investigation, the woman said that she did not speak about their relationship publicly because if people knew about it, his "job could be on the line". However, in interview the

officer stated that he did not consider the relationship "inappropriate" as it was consensual and he did not try to keep it "secret".

The relationship continued for several months, and the officer transferred to another police service. He then ended the relationship with the woman and had no further contact with her. Concerns about the officer had not yet been raised at the stage he transferred between forces.

During the IOPC investigation, the woman stated that she felt she could not contact the police about ongoing issues with her ex-partner due to the secrecy of her relationship with the officer. The woman explained that she felt she could not talk to the officer about the issues she was having with her ex-partner, and she could not go to the police as that could put the officer's job in jeopardy.

National Police Chief Council: Abuse of position for sexual purpose video

The video covers the definition of abuse of position for sexual purposes and clarifies what constitutes abuse of position.

**More information**  
[www.youtube.com/watch?v=ONcyBtaQWl8](https://www.youtube.com/watch?v=ONcyBtaQWl8)

The officer noted in interview that at no time during his employment with the first police service had he received any training about abuse of position for sexual purpose. The IOPC investigation reviewed the officer's training records. This was confirmed and it was discovered that the force did not have a policy at the time around abuse of position for sexual purpose. ■

KEY QUESTIONS FOR MANAGERS, POLICY MAKERS AND TRAINERS

- How does your vetting process for transferees support you to identify any known risks?
- How do you make sure your approach to guidance and training about abuse of position for sexual purpose reflects national guidance?
- How do you use the NPCC abuse of position training video to improve awareness among officers and staff about what constitutes abuse of position for sexual purpose?

Call the National Domestic Abuse Helpline if you have been affected by this case and would like support. It is free, confidential and open 24 hours a day on 0808 2000 247. For more information visit <https://refuge.org.uk/>

KEY QUESTIONS FOR POLICE OFFICERS AND STAFF

- What is your understanding of maintaining professional boundaries with the people you meet through the course of your duties?
- How would you source an answer to a question about your force's policies on maintaining professional boundaries?

ACTION TAKEN BY THIS POLICE FORCE

- The first force the officer worked for introduced abuse of position for sexual purpose content into presentations by the professional standards department. This is delivered to all new student officers, transferees, and special constables. This refers to the Code of Ethics and other national resources.
- They also introduced an abuse of position for sexual purpose course for sergeants which covers sexual harassment in the workplace.
- The first force also cascaded a national abuse of position for sexual purpose e-learning package to all officers and staff. This was developed following an IOPC learning recommendation into a separate incident relating to this area.

OUTCOMES FOR THE OFFICERS AND STAFF INVOLVED

The officer was found to have a case to answer for gross misconduct. He faced disciplinary proceedings for breaching the Standards of Professional Behaviour for authority, respect and courtesy, honesty and integrity (integrity only), duties and responsibilities and discreditable conduct.

The officer resigned during the misconduct process. He would have been dismissed without notice had he still been serving. The officer was placed on the barred list.



# Support and information

## Police corruption reporting lines

### Crimestoppers

[www.crimestoppers-uk.org](http://www.crimestoppers-uk.org)

A charity that is independent of the police and helps break down barriers to reporting crime with its cast-iron promise of complete anonymity. The Police Anti-Corruption and Abuse Reporting Service gives people a way to report information about a police officer, member of police staff or volunteer who they believe are taking advantage of their role or abusing their position of power.

Online form: <https://forms.theilne.co.uk/police-anti-corruption-and-abuse-reporting-service>

Tel: 0800 085 0000

### IOPC anti-corruption report line

The IOPC report line is a whistleblowing line to enable police officers or staff to report concerns of wrongdoing or malpractice within the workplace.

Tel: 08458 770061

(9am - 5pm Monday to Friday - please leave a voicemail after hours)

Email: [reportline@policeconduct.gov.uk](mailto:reportline@policeconduct.gov.uk)

## Domestic abuse

### Women's Aid & Welsh Women's Aid

[www.womensaid.org.uk](http://www.womensaid.org.uk)

[welshwomensaid.org.uk](http://welshwomensaid.org.uk)

Women's Aid is the national charity working to end domestic abuse against women and children. Women's Aid is a lifesaving federation of frontline domestic abuse services, supporting women and children at the most challenging times of their lives.

Live chat: <https://chat.womensaid.org.uk/>

Email: [helpline@womensaid.org.uk](mailto:helpline@womensaid.org.uk)

### Refuge

<https://refuge.org.uk/>

Refuge is the largest specialist domestic abuse organisation in the UK. On any given day their services support thousands of survivors, helping them to overcome the physical, emotional, financial and logistical impacts of abuse and rebuild their lives – free from fear.

Tel: 0808 2000 247

British Sign Language helpline:

[www.nationaldahelpline.org.uk/bsl/](http://www.nationaldahelpline.org.uk/bsl/)

## Victim Support

<https://www.victimsupport.org.uk>

Victim Support is an independent charity dedicated to supporting victims of crime and traumatic incidents in England and Wales.

Tel: 08 08 16 89 111

## Mental health

### Samaritans

[www.samaritans.org/](http://www.samaritans.org/)

Every ten seconds, Samaritans respond to a call for help. No judgement. No pressure. Samaritans are here for anyone who needs someone and are available 24/7. Whatever you're going through, you can call any time, from any phone for free.

Tel: 116 123

Email: [jo@samaritans.org](mailto:jo@samaritans.org)

### Oscar Kilo

[www.oscarkilo.org.uk/](http://www.oscarkilo.org.uk/)

Oscar Kilo is the National Police Wellbeing Service, providing support and guidance for police forces across England and Wales to improve and build organisational wellbeing. It provides resources and support developed specifically for policing, by

policing, and designed to meet the unique needs of officers and staff, their families and those who leave the service.

### Shout

<https://giveusashout.org/>

Shout is the UK's first and only, free, confidential, 24/7 text messaging support service for anyone who is struggling to cope.

Text: 'SHOUT' to 85258

## Substance misuse

### With You

[www.wearewithyou.org.uk](http://www.wearewithyou.org.uk)

With You is a charity providing free, confidential support to adults and young people facing challenges with drugs, alcohol and mental health.

### Turning Point

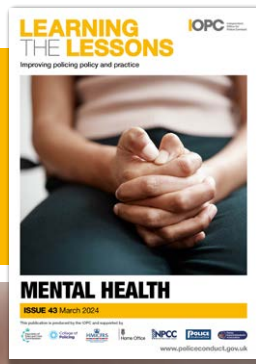
[www.turning-point.co.uk](http://www.turning-point.co.uk)

Turning Point is a leading social enterprise, designing and delivering health and social care services in the fields of substance use, mental health, learning disability, autism, acquired brain injury, sexual health, homelessness, healthy lifestyles, and employment.



## YOUR FEEDBACK ON ISSUE 43: Mental health

(March 2024)



### Thinking about the content of issue 43

**99%**

said this magazine was relevant to their work

**97%**

said the mix of cases and feature articles felt about right

**95%**

said the case summaries were clear and easy to understand

### Thinking about the impact of issue 43

**94%**

said this magazine was a useful tool to help drive change in police policy and practice

**97%**

said this magazine provided useful knowledge to supplement information they receive from training, briefings or practical experience

**92%**

of people in relevant roles said they will consider making changes to any policy, guidance, processes or training they are responsible for to reflect the learning from this magazine

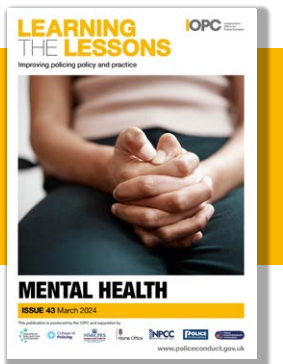
**97%**

said they intended to share issue 43 with their colleagues to share the learning it contains

Based on 78 responses to the survey.

## YOUR FEEDBACK ON ISSUE 43: Mental health

(March 2024)



## Top tips: What next from our readers of issue 43 (mental health)

In response to our last issue of Learning the Lessons, readers gave us important insights into how they shared the magazine with others, and how they put the learning to use. We have turned some of those insights into top tips. **Which could you put into action?**

### Manager or supervisors

- Consider different ways to talk about and share the magazine with your team.
- Could you use the case studies or key questions as discussion points with your team to identify opportunities to reflect on existing practices?
- Consider the different meetings, boards and events you attend. Would it be useful to highlight key insights from the magazine at any of them?
- Encourage your teams to join our mailing list by emailing [learning@policeconduct.gov.uk](mailto:learning@policeconduct.gov.uk)

### Frontline officers and staff

- Did you find any case studies or articles that were particularly interesting or relevant? Consider sharing them with colleagues who may be interested in finding out more.
- Join our mailing list and encourage your colleagues to do the same by emailing [learning@policeconduct.gov.uk](mailto:learning@policeconduct.gov.uk)
- Fill out our feedback survey (QR code below) so we can make sure Learning the Lessons continues to work for you.

### Communication teams

- Could you share the latest magazine on your intranet,

organisational learning portal or other platforms regularly accessed by officers and staff?

- Do you have noticeboards in key places? Consider featuring our poster, which features a handy QR code to download the magazine onto phones and devices [www.policeconduct.gov.uk/our-work/learning/learning-the-lessons](http://www.policeconduct.gov.uk/our-work/learning/learning-the-lessons)
- Consider helping us to share the magazine on your social media accounts to help reach new audiences.

### Policy leads

- Consider opportunities to review and sense check existing policies in line with the learning in the magazine.
- Can you help to make sure the magazine has reached the right thematic leads in your force who will be most interested in the learning it contains, and can help influence changes to policy and practice?

### Learning and development teams

- Consider if any of the case studies included in this magazine would be useful to embed into existing training packages to bring important topics to life.
- Have a training event coming up? Ask us for a small pack of free hard copies of the magazine to hand out by emailing [learning@policeconduct.gov.uk](mailto:learning@policeconduct.gov.uk).

**YOUR  
FEEDBACK  
NEEDED**

## What do you think about the latest issue?

How useful did you find it?

What topics would you like to see covered in future issues?

Please complete our three-minute feedback survey:  
[www.smartsurvey.co.uk/s/Learningthelessons44/](http://www.smartsurvey.co.uk/s/Learningthelessons44/)

The survey is open until  
**2 December 2024.**





# Interested in receiving new issues of Learning the Lessons?

The magazine is available to everyone. Email [learning@policeconduct.gov.uk](mailto:learning@policeconduct.gov.uk) and we will let you know when a new issue is published.



## Want to get involved in the development of Learning the Lessons?

We have created a virtual panel, bringing together stakeholders from the police, community and voluntary sectors, and academia, to support the development of future issues of Learning the Lessons.

Email [learning@policeconduct.gov.uk](mailto:learning@policeconduct.gov.uk) if you are interested in joining the panel. Panel members are invited to review and provide feedback on drafts six to eight weeks before publication.