

Joint Audit and Scrutiny Panel Thematic Report; Whistleblowing, Anti-Fraud and Corruption Policies and Review of Compliance

1. Objectives

The objective of this report is:

- To provide an overview of the structure of the Counter-Corruption Unit (CCU) within the Professional Standards Directorate and the CCU's strategic priorities
- To provide the Nottinghamshire Police and Crime Commissioner with an overview of how members of the organisation are able to report matters of concern to the Professional Standards Directorate.
- To provide a summary of how reports to the CCU are categorised and dealt with.

2. Departmental Structure and Strategy

The CCU forms part of the PSD based at force headquarters. The CCU is led by a Detective Sergeant and consists of three Detective Constable investigators; two staff investigators, one of whom is an accredited financial investigator; an analyst and two intelligence researchers. The unit comes under the supervision of the PSD Detective Inspector and Detective Chief Inspector. The department has recently been given permission to recruit a full time Prevent officer, whose role will be to engage with the workforce and with partner agencies to provide information on police corruption and how concerns can be reported.

The aim of the CCU is to undertake investigations into suspected corruption by police officers and staff and to proactively look for evidence of corrupt activity within the workforce. The CCU employs a number of overt and covert techniques to look for and investigate allegations of corruption and has relationships with partners in regional forces and organisations.

Nationally, counter-corruption strategy is set by the National Counter-Corruption Group; the Head of PSD represents Nottinghamshire at meetings of this group. There is also a regional counter-corruption group, which meets quarterly and is chaired by the Nottinghamshire Head of PSD.

The Nottinghamshire CCU works to strategic priorities, which are set at the start of each financial year. The strategic priorities for 2021/2022 are:

1. Disclosure of information.
2. Inappropriate associations.
3. Sexual misconduct (including the abuse of position for sexual purpose with members of the public and internal sexual harassment).

The priorities will be evaluated towards the end of the year and new priorities set for 2023/24

3. Reporting

Police officer and staff have a positive duty under the Code of Ethics to report and challenge unethical conduct. Nottinghamshire Police operates a whistleblowing policy, which is regularly reviewed and updated; the most recent update was in July 2022. The policy is owned by the PSD.

The policy sets out how members of the organisation can report concerns to the PSD via a number of overt and confidential channels. The policy also sets out what is considered to be a “qualifying disclosure” or “protected disclosure” under the Public Interest Disclosure Act 1998 and the Police Reform Act 2002.

Mechanisms for the internal disclosure of information set out in the policy include:

- Direct reports to line management.
- Confidential reporting via the “Integrity Messenger” system. This allows staff to communicate directly with the CCU via means of a two-way encrypted messaging system.
- Making confidential reports direct to CCU via a dedicated telephone number and email address.
- Raising concerns through staffing associations.
- Raising concerns directly to PSD in person or in writing.

Mechanisms for the external disclosure of information include:

- Reporting via the Office of the Police and Crime Commissioner (OPCC).
- Reporting via the Independent Office for Police Conduct (IOPC).
- Anonymous reports via Crimestoppers.
- Direct reports to the Criminal Case Review Commission (CCRC).

The actions to be taken in the event of a report, protections offered to whistle blowers and the responsibilities of individuals, line managers and departments are all set out in the policy.

4. Statistics for reports in previous reporting period

In the previous reporting period 10th November 2021 to 11th March 2022 a total of 35 confidential referrals were received by the CCU. 8 of these referrals fell within the National Counter Corruption categories as set by the NCA.

National Counter Corruption categories:

Infiltration	0
Disclosure of Information	1
Perverting the course of justice	0
Sexual Misconduct	1
Controlled Drug Use and Supply	0
Theft and Fraud	1
Misuse of Force Systems	3
Abuse of Authority – Superseded on the 01/03/22 to Exploitation of the Privilege of Office	0

Inappropriate Association	0
Vulnerability	1
Other Criminal Behaviour	1
Other corrupt activity	0

Of these confidential reports, none resulted in criminal or formal misconduct investigations, however 5 received some form of intervention by the PSD or the individuals line manager.

The remaining 27 fell outside of the National Corruption categories as set by the NCA:

Non-counter corruption categories:

Other	0
Business Interest	0
Bullying/ Grievances/ Recruitment	3
Performance issues/ divisional issues	8
Gift, Gratuitously and Hospitality	0
Information Security	1
Conduct Issue	11
Sickness, Disability and Restricted Duties	0
Notifiable Associations	0
Vetting Information Issue	1
Mapped OCG Group	0
Officer Safety	0
Social Media	2
Internal Intel Dissemination	1

Of these confidential reports sitting outside of the corruption categories, 1 resulted in a misconduct investigation with 9 receiving some form of PSD or line manager intervention.

In addition to the above confidential reporting, the CCU dealt with 76 cases through other reporting or proactive methods, of which 36 fell into the NCA corruption categories and 40 into the non-corruption categories.

5. Statistics for reports in current reporting period

In the most recent reporting period, 12th March 2022 to 11th July 2022 there have been 25 confidential referrals to the CCU. 10 of these fell into National Counter Corruption Categories

National Counter Corruption categories:

Infiltration	0
Disclosure of Information	1
Perverting the course of justice	0
Sexual Misconduct	0
Controlled Drug Use and Supply	1
Theft and Fraud	0
Misuse of Force Systems	1

Exploitation of the Privilege of Office	1
Inappropriate Association	1
Vulnerability	3
Other Criminal Behaviour	1
Other corrupt activity	1

Of these confidential reports, none resulted in criminal or formal misconduct investigations, however 4 received some form of intervention by the PSD or the individuals line manager.

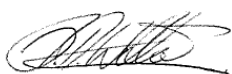
The remaining 15 cases fell outside of the National Corruption categories as set by the NCA:

Non-counter corruption categories:

Other	0
Business Interest	0
Bullying/ Grievances/ Recruitment	4
Performance issues/ divisional issues	4
Gift, Gratuitously and Hospitality	0
Information Security	0
Conduct Issue	7
Sickness, Disability and Restricted Duties	0
Notifiable Associations	0
Vetting Information Issue	0
Mapped OCG Group	0
Officer Safety	0
Social Media	0
Internal Intel Dissemination	0

Of these confidential reports sitting outside of the corruption categories, 2 resulted in misconduct investigations with 9 receiving some form of PSD or line manager intervention.

In addition to the above confidential reporting, the CCU dealt with 90 further cases through other reporting or proactive methods, of which 53 fell into the NCA corruption categories and 37 into the non-corruption categories.



Detective Superintendent Hayley Williams
Head of Professional Standards Directorate
Nottinghamshire Police

November 2022