

ORIGINATOR: CHIEF CONSTABLE

PAPER NO: AP15/24

**SUBMITTED TO: ACCOUNTABILITY AND PERFORMANCE PANEL -
28 APRIL 2015**

**SUBJECT: RESPONSE TO INTEGRITY AND FATAL ROAD TRAFFIC
INCIDENT INSPECTIONS**

SUMMARY:

1. Two national inspection reports were published at the beginning of 2015; the first related to integrity issues within the police service; the second to the investigation and prosecution of fatal road traffic incidents. Both reports made national recommendations for police forces that are relevant to Suffolk Constabulary. This paper outlines the organisations response to these recommendations to date.

RECOMMENDATION:

1. The Accountability and Performance Panel is asked to note the content of the two appendices in particular.

1. KEY ISSUES FOR CONSIDERATION

- 1.1 This paper outlines the content of two separate inspections conducted in 2014 and published in 2015. This part of the paper outlines the context, methods and key findings. Appendices A and B summarise the recommendations relevant to Suffolk Constabulary and the organisations' actions in response.

Integrity Matters Inspection

- 1.2 Evidence shows that the legitimacy of the police service can have a direct impact on reducing crime. Trust and integrity are vital components of a police force becoming "legitimate" among the people it polices and there have been several national media events in recent times which have potentially eroded public trust in policing.
- 1.2.1 As such, in March 2014 the Home Secretary commissioned Her Majesty's Inspectorate of Constabulary (HMIC) to conduct an inspection into the state of integrity matters in the England and Wales police service. HMIC conducted inspections throughout the country building on its previous inspection in 2012 and recent Independent Police Complaints Commission reports.
- 1.3 The inspection centred on monitoring against four criteria as follows:
- a. Progress in managing professional relationships with integrity and transparency
 - b. Progress communicating ethics to staff
 - c. How proactive forces search for misconduct
 - d. How well is corruption prevented and investigated
- 1.5 Overall the inspection concluded that England and Wales police forces had made progress against 123 of the 125 recommendations set out in its previous report. The latest report *Integrity Matters*, published in January 2015 set out additional recommendations for forces to consider. These recommendations and the subsequent responses put in place by Suffolk Constabulary (in conjunction with Norfolk Constabulary which shares a joint Professional Standards Department with Suffolk Constabulary) are set out at Appendix A.

The Investigation and Prosecution of Fatal Road Traffic Incidents

- 1.6 In February 2015 Her Majesty's Crown Prosecution Service Inspectorate (HMCPSI) and HMIC published a joint thematic report into the investigation and prosecution of Fatal Road Traffic Incidents (FRTI). This was the third such review, following on from the first in 2002 and the second in 2008.
- 1.7 The scope of the inspection included twelve points including:
- a. The impact of new offences introduced by the Road Safety Act 2006
 - b. The impact of new CPS guidance on driving offences published in May 2013
 - c. Measuring the quality of service provided to bereaved families by the police and CPS
 - d. Consider the availability of specialist training for police officers and prosecutors
 - e. Monitor progress made in relation to recommendations of the 2008 report

- 1.8 HMCPSI and HMIC visited six police forces as part of their inspection methodology. Suffolk Constabulary was not one of these forces.
- 1.9 The report found differences in police models but shared characteristics of passion and commitment among officers. It did find some disparity in the training and equipment provided to non specialist roads policing officers who are sometimes called to the scene of an Fatal Road Traffic Incident (FRTI) first.
- 1.10 The inspection found that the police response to bereaved families was satisfactory and families reported that police were supportive.
- 1.11 The report makes four recommendations for police forces and Suffolk Constabulary's response to these is outlined at Appendix B.

2. FINANCIAL IMPLICATIONS

- 2.1 There are no financial implications.

3. OTHER IMPLICATIONS AND RISKS

- 3.1 There are no other implications or risks.

ORIGINATOR CHECKLIST (MUST BE COMPLETED)	PLEASE STATE 'YES' OR 'NO'
Has legal advice been sought on this submission?	NO
Has the PCC's Chief Finance Officer been consulted?	NO
Have equality, diversity and human rights implications been considered including equality analysis, as appropriate?	YES
Have human resource implications been considered?	YES
Is the recommendation consistent with the objectives in the Police and Crime Plan?	YES
Has consultation been undertaken with people or agencies likely to be affected by the recommendation?	NO
Has communications advice been sought on areas of likely media interest and how they might be managed?	NO
Have all relevant ethical factors been taken into consideration in developing this submission?	YES

Appendix A: Integrity Matters Recommendations and Actions

This table only includes recommendations relevant to Suffolk Constabulary. Others were allocated to other agencies e.g. Home Office.

Integrity Matters Reference	Recommendation	Response
Recommendation 3	<p>With immediate effect, all forces should ensure that the initial assessment of all public complaints is conducted by a chief inspector or police staff equivalent in accordance with:</p> <p>(a) Police (Complaints and Misconduct) Regulations 2012, Regulations 30 and 33 – in respect of public complaints, and</p> <p>(b) Police (Conduct) Regulations 2012, Regulation 3(5) – in respect of internal misconduct reports.</p>	<p>A new process has been developed and implemented from 30th March 2015 which shows the process of a police staff chief inspector equivalent endorsing all initial complaints from members of the public.</p>
Recommendation 4	<p>By 31 August 2015, chief constables should review the number of officers and staff with protected characteristics who have formal allegations made against them, to ensure that force processes are operating without bias or discrimination.</p>	<p>Analysis has been undertaken on complaint and conduct investigations. No conclusions of bias or discrimination were identified. The introduction of Enterprise Resource Planning (ERP) will enable more effective monitoring in future.</p>
Recommendation 6	<p>By 31 August 2015, all forces should have systems in place to publish the outcomes of all misconduct cases including those involving criminal and corrupt behaviour.</p>	<p>A communications strategy has been developed and misconduct findings now appear in the public section of quarterly PCC reports.</p>
Recommendation 7	<p>By 31 August 2015, all forces should have in place a confidential means of reporting wrongdoing, in which officers and staff have confidence.</p>	<p>A confidential reporting line was already in place prior to the inspection. A two way confidential facility is currently on the ICT work programme.</p>
Recommendation 9	<p>By 31 August 2015, all forces should ensure that their policies on the acceptance of gifts and hospitality comply with the national guidelines. By the same date, all officers and staff should be reminded of the policies.</p>	<p>This policy is currently under review by the Head of PSD.</p>
Recommendation 10	<p>By 31 August 2015, all forces should comply with national vetting policies.</p>	<p>The national vetting policy has not yet been published.</p>

Integrity Matters Reference	Recommendation	Response
Recommendation 11	<p>By 31 August 2015, in order to identify potential corruption, all forces should have systems in place to assess annually:</p> <p>(a) whether information on approved business interests remains up to date, and is appropriate;</p> <p>(b) where business interests have not been approved, that this decision has been complied with;</p> <p>(c) whether information in respect of notifiable associations remains up to date and is appropriate; and</p> <p>(d) registers concerning procurement of services.</p>	<p>Business interests are reviewed on a case by case basis according to risk assessment. A fuller review of this process is taking place within the current policy review. Part of this work will examine links to the Procurement Department.</p>
Recommendation 12	<p>By 31 August 2015, all forces should ensure they have the necessary capability and capacity to develop and assess corruption-related intelligence in accordance with the authorised professional practice.</p>	<p>Two additional Detective Constables have been appointed to the Anti-Corruption Unit for a twelve month period.</p>
Recommendation 13	<p>By 31 August 2015, all chief constables should satisfy themselves that they have processes in place to ensure that investigations into misconduct by officers and staff resulting in “no further action” are fair and free of any form of discrimination.</p>	<p>Decision making rationale is comprehensively documented in investigation case files. The National Decision Model is the primary decision making framework.</p>
Recommendation 14	<p>By 31 August 2015, all forces should ensure that there is sufficient analytical capability to analyse threats, risks, harms and trends in respect of misconduct, criminality and corruption in support of professional standards departments and anti-corruption units</p>	<p>An additional Analyst and Researcher have been appointed to PSD for a twelve month period to build capacity.</p>

Appendix B: Investigation and Prosecution of FRTI: Recommendations and Actions

This table only includes recommendations relevant to Suffolk Constabulary.

FRTI Reference	Recommendation	Response
Recommendation 1	Police disclosure officers must ensure that all disclosure schedules prepared include policy and strategy logs	All policy and strategy logs are maintained electronically and included on disclosure schedules. Senior Investigating Officers (SIO) for FRTIs are collocated with Investigating Officers to assist in the process of documenting policy and strategy within disclosure.
Recommendation 2	<p>Police forces should ensure that the most effective and appropriate resources are deployed to the scene of collisions which involve or may involve a fatality by arranging that:</p> <ul style="list-style-type: none"> • officers dispatched to the scene have the necessary training and equipment to perform the role effectively; and • specialist resources required are readily available to the senior investigating officers at the scene 	<p>Roads Policing officers are always dispatched to serious collisions. They are all trained in scene management and as such are able to deputise for SIOs until their arrival. They are also all trained as Family Liaison Officers (FLO).</p> <p>All Roads Policing Sergeants are SIO trained and capable of supervising collision scenes. If a deliberate act has occurred the Major Investigation Team is brought in to take over the investigation.</p> <p>Forensic Collision Investigators provide 24 hour, 7 day a week coverage.</p>
Recommendation 3	Police forces should ensure that police officers performing the role of family liaison officer have adequate time to perform their role effectively	FLO workloads are managed at daily briefings. FLOs are “ring-fenced” to complete their work. During absences a FLO Co-ordinator manages the FLO workload.
Recommendation 4	Police forces should ensure that family liaison officers involved in road death investigations have regular mandatory checks by occupational health departments	The FLO coordinator or deputy will conduct a pre-engagement briefing with the appointed FLO. This covers all aspects of the enquiry and includes the officer signing to say they understand the role and are

FRTI Reference	Recommendation	Response
		<p>presently capable of the duty. The FLO reports to the SIO throughout the deployment. A debrief sheet is sent to the family at the conclusion of the case for feedback as to the conduct of the FLO. There is an annual FLO conference with guest speakers from Occupational health. A TRIM (trauma management) review is conducted each day at the daily management meeting to double check a TRIM process has started. This is a process for debriefing an incident with a specially trained peer to identify a training or occupational health referral need after serious incidents. FLOs are referred to a psychologist appointed by the force each year for an annual check-up.</p>