



Professional Standards **HANDBOOK**

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1. INTRODUCTION

- 1.1 This handbook is designed to give general guidance on the standards of conduct expected from officers and staff of Suffolk Constabulary.

It includes the Constabulary's policies in respect of business interests, confidential reporting and sets out the procedures available for making a complaint.

Suffolk Constabulary is committed to a culture in which all employees can help the organisation maintain its high standards by reporting corrupt, dishonest or unethical behaviour.

Employees who breach codes of professional conduct threaten the Constabulary's reputation and effectiveness.

It is the responsibility of all officers and staff to report these breaches, safe in the knowledge that they are taking the right course of action, will be supported by colleagues and protected from harassment or victimisation.

Anyone who has any queries about this handbook should contact Professional Standards on ext 3954.

- 1.2 This guidance supercedes the previous handbook (Do's and Don'ts) and sets out the minimum requirements that police personnel should observe to maintain the Constabulary's Professional Standards.

2. PRINCIPLES

- 2.1 All police personnel should adhere to the highest standards of personal conduct. Whether on or off duty,

police personnel should not behave in a way which is likely to bring discredit on the police service.

3. CRIMINAL OFFENCES

Corruption

3.1. It is a criminal offence for individuals to receive or give corruptly any gift, loan, fee, reward or gain any other advantage for doing or not doing anything or showing favour or disfavour to any person.

3.2 The law is strengthened by various statutory provisions.

S.117, Local Government Act 1972 provides that an individual:

Must disclose any pecuniary interest whether direct or indirect in any contract in which the Constabulary is concerned; and shall not under colour of office or employment accept any fee or reward whatsoever other than proper remuneration.

3.3 Under the Prevention of Corruption Act 1906 it is an offence to accept corruptly any gift or consideration as an inducement or reward for:

Doing (or not doing) anything in your official capacity; or
Showing favour (or disfavour) to anyone in your official capacity.

3.4 Under the Prevention of Corruption Act 1916 any money, gift or consideration (including hospitality) received from a person or organisation holding or seeking to obtain a contract may be deemed by the courts to have been received corruptly unless you prove otherwise.

- 3.5 In certain circumstances these offences could be committed by a gift or consideration being accepted by a friend or relative as well as by you.

Harassment/Equal Opportunities

- 3.2.1 Staff should be aware that harassment or failure to comply with equal opportunities standards could result in an infringement of legislation for which there is in many cases, a personal liability including the following:

- Race Relations Acts 1976 & 2000
- Race Relations [Amendment] Act 2000
- Disability Discrimination Act 1995
- Protection from Harassment Act 1997
- Sex Discrimination Act 1975
- Employment Equality [Religion Or Belief] Regulations 2003

Data Protection & Freedom Of Information Act

- 3.3.1 The obtaining, disclosure and use of information is controlled by various legislation including the Data Protection Act 1998 and the Computer Misuse Act 1990. The Constabulary has issued policies and guidelines in respect of the obtaining, use and disclosure of information, any breach of which may result in personal criminal liability as well as local disciplinary action. Staff should familiarise themselves with policies and guidelines. In case of doubt, written advice should be sought from line managers and/or the Information Compliance Officer.

4. REGULATIONS

- 4.1 Police officers are bound by a statutory Code of Conduct. The code is contained in Schedule 1 of the Police [Conduct] Regulations 2004. The Code identifies areas of conduct and defines standards which are desirable. The Code is reproduced in its entirety at Appendix 'A'.

5. STATEMENT OF COMMON PURPOSE AND VALUES

- 5.1 Suffolk Constabulary subscribes to the Police Service's Statement of Common Purpose and Values which is reproduced at Appendix 'B'.

This statement is clearly displayed in all police buildings and is first introduced to officers as part of their probationary training. It is a part of the induction training given to new support staff.

6. POLICE STAFF TERMS AND CONDITIONS OF EMPLOYMENT

- 6.1 The Police Staff Terms and Conditions of Employment Manual contains specific reference to the standards of conduct expected of police staff. The relevant sections are reproduced at Appendix 'C'.

7. EQUAL OPPORTUNITIES / HARASSMENT

- 7.1 Suffolk Constabulary takes its responsibilities for equal opportunities very seriously and this is endorsed in our Equal Opportunities and Harassment Policies. The aim of these policies is to ensure that all staff and all applicants enjoy real equality in employment,

irrespective of gender, age, marital status, sexual orientation, creed/religion, ethnic origin or disability. An individual who infringes Constabulary policies as well as being potentially liable may also find themselves liable to disciplinary action.

- 7.2 Acts of discrimination [direct or indirect] and harassment will not be tolerated. Allegations will be fully investigated and when justified, disciplinary action will be taken.

8. DISCLOSURE OF INTERESTS

- 8.1 It is the responsibility of an individual to immediately report to their line supervisor any potential or existing conflict of interest that might arise in the execution of their responsibilities and duties. As a general principle, it would be unwise for staff to be involved in the investigation/enquiry/decision making processes for matters relating to a close relative or personal friend.

The test should be, how would the involvement appear to a third party who was possibly aggrieved by the outcome. We should always seek to remove any appearance of bias where this could legitimately be alleged. The disclosure of interests relating to gifts, gratuities, contracts and purchasing is dealt with below.

9. GIFTS/GRATUITIES/DISCOUNTS

- 9.1 Great care must be taken not to abuse a connection with the Constabulary to obtain gifts, monetary rewards, preferential rates for private deals or other favours.

An individual or a member of their family should tactfully refuse any personal gift offered to them which has arisen out of their employment in the Constabulary or an individual or organisation's association with us, however this has arisen.

- 9.2 The only exceptions to these rules are small gifts of token value by way of trade advertisements or given on conclusion of a courtesy visit, e.g. calendars, diaries, pens etc.
- 9.3 In the event of an individual receiving a gift (other than those above) without warning or to which refusal would give offence this should be reported to the person's Head of Department/Area Commander who will advise the Chief Constable of the circumstances, via the Head of the Professional Standards Section.
- 9.4 The Chief Constable will decide whether the gift should be retained, returned or forwarded to some charitable or other deserving cause. The donor will be advised of the decisions made.
- 9.5 Details of gifts other than those of token value and actions taken in respect of them will be recorded in a Register maintained by the Professional Standards Section. The register will be made available to the Finance Section who will consider the tax implication of acceptance.
- 9.6 Staff will not, except as a duty commitment, accept or attempt to gain free access to public entertainment/ shows/ sporting events etc, by virtue of their office/employment. The only exception to this would be events specifically organised for and advertised to groups in general eg emergency services.

- 9.7 Staff will not accept or attempt to gain free travel on public transport by virtue of their office/employment except in those cases approved by the Constabulary and then only when on duty in accordance with any criteria laid down for acceptance.
- 9.8 Purchases made through recognised Sports & Social Club activities, Union and Staff Associations discount schemes, are necessarily separate and distinct from the Force. Provided there is no reference to the Constabulary in any trading arrangements, these activities are recognised as bona fide.

10. GIVING AND RECEIVING HOSPITALITY

- 10.1 Any hospitality given must be capable of being justified as in the public interest. It should be on a scale appropriate to the occasion.
- 10.2 Individuals must consider carefully offers of hospitality where any suggestion of improper influence is possible.
- 10.3 Special caution is necessary where hospitality is offered by a person or body having or seeking business with or a decision from the Constabulary, particularly where the offer is to an individual only.
- 10.4 The extent and location of the hospitality should determine the degree to which an offer of hospitality is acceptable. A practical test is whether the hospitality offered could or would be reciprocated by the Suffolk Constabulary. When making this decision staff will distinguish between the following:

- Is it a duty participation, eg public speaking?
 - Is it a duty attendance? This could include developing community partnerships, but only if the 'work' element is important and a significant return is anticipated.
 - Is it mainly social or for pleasure? If so, attendance should never be free.
- 10.4 It will rarely be appropriate to accept certain categories of invitation, eg high profile corporate hospitality events, such as Wimbledon, Test Matches, FA Cup Finals or other major sporting events.

11. WILLS

- 11.1 When a member of staff, their partner, or a relative benefits from a Will as a result of a contract/relationship developed through their status as a member of the Suffolk Constabulary, then the circumstances will be reported by that person to the Financial Services Manager outlining the reasons for the benefit.

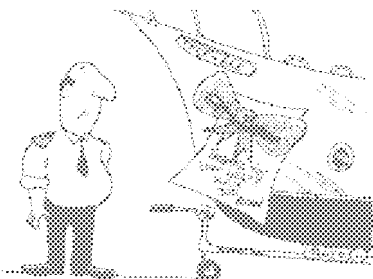
12. SPONSORSHIP

- 12.1 These guidelines relate to independent activities that fall outside of the work environment:
- Sponsorship must not be for personal gain;
 - Sponsorship may be courted by a member of Suffolk Constabulary for charitable purposes, or a charitable cause, ie treatment for a sick child;

- Any appeal should make it clear that it is the individual who is seeking support for the cause on behalf of the charitable purpose/cause. The occupation of the person making the appeal may properly be discussed but staff should be careful not to use their position within the Constabulary to give any impression that any favour or discrimination will be made by the Constabulary or the individual in their official position by the giving or not giving to the cause being promoted.

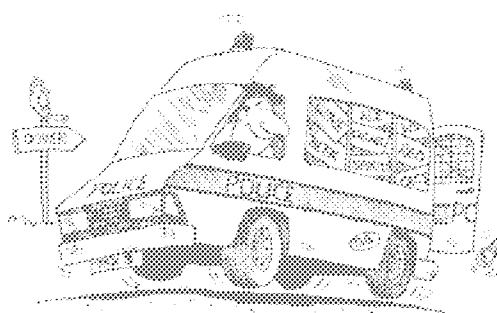
13. CONTRACTS AND PURCHASING

- 13.1 The offering of a gift or other consideration of any kind as an inducement to some action or forbearance pertaining to a contract is forbidden. If any such approach is made to a member of staff or a member of their family, either in connection with a contract or with the object of obtaining preferential treatment prior to the acceptance of a contract, the fact must be reported, in writing, immediately to the Financial Services Manager.
- 13.2 All invitations of hospitality received from a company whilst in the process of tendering for work will be declined.
- 13.3 Staff who are privy to confidential information on tenders or costs for either internal or external contractors will not disclose that information to any unauthorised party or organisation.



- 13.4 Staff should ensure that all purchasing and procurement activities are carried out in a fair and impartial way, in accordance with internal procedures, and ensure that the Constabulary complies with the ethical code contained within the guidelines published by the Chartered Institute of Purchasing and Supply.
- 13.5 No association between Suffolk Constabulary and a supplier or contractor must be capable of being misinterpreted as a commercial endorsement of the product/service or as discriminatory to competitors. Purchasing Officers must at all times demonstrate to suppliers that they are impartial managers of public funds.
- 13.6 Where there is any doubt about the propriety of actions, advice should be sought from the Head of Procurement.
- 13.7 Written records, (including computer records) are essential to enable both staff and departments to demonstrate that proper ethical standards have been observed. The records should serve both as an audit trail and as a record of the reasons for making any particular purchasing decision.
- 13.8 Caution should be exercised where free or substantially discounted offers of services or goods are made which could be designed to promote a person's or body's interests through association with the Constabulary.
- 13.9 Where this appears to be occurring, advice should be sought from the Head of Procurement who will, where appropriate, advise the Chief Constable on the commercial aspects involved.

14. USE OF CONSTABULARY FACILITIES



14.1 Save in the smallest and most trivial of matters, individuals shall not use Constabulary equipment or facilities for personal purposes unless prior permission has been sought.

15. USE OF INFORMATION

15.1 Police personnel must not obtain, use or disclose information unless it is necessary and within the law to do so. It is important that staff act with the utmost propriety in this much challenged area to ensure actions are within the law, justifiable and defensible. To this end, all instructions on record keeping must be strictly complied with. In cases of doubt, advice should be sought from line managers and/or the Information Access Manager.

16. BUSINESS INTERESTS

16.1 The Police Regulations 2003 impose restrictions on the private lives of police officers. The objective is to ensure not only efficiency in doing the job but also that officers shall at all times abstain from any activity which is likely to interfere, or give the impression of interfering, with the impartial discharge of their duties.

16.2 Any officer who has, or proposes to have, a business interest is required to submit an application.

Consideration will be given by the Deputy Chief Constable as to whether the proposed interest is compatible with the officer remaining in the force.

- 16.3 The same general requirements apply to police staff and these are detailed at Appendix C and on the HR intranet page.
- 16.4 Further details of Business Interests are set out at Appendix D and on the Professional Standards intranet page.
- 16.5 General guidance on this policy and the criteria used is given at Appendix D.

17. CONFIDENTIAL REPORTING

- 17.1 The Constabulary is committed to the highest possible standards of openness, propriety and integrity. In line with that commitment, and requirements of the Public Interest Disclosure Act 1998, staff with concerns about any aspects of professional standards are encouraged to come forward and voice their concerns. It is the aim to create a climate where staff feel a genuine obligation to openness and transparency when reporting breaches of professional standards. Their motivation should arise from a desire to maintain the integrity of the police service and with the knowledge that such action will be universally acknowledged as right.
- 17.2 All staff have a clear responsibility to report suspected corrupt, dishonest or unethical behaviour by others. Staff should be aware that non-reporting will in itself be the subject of censure in line with the code of conduct.
- 17.3 It is the responsibility and duty of every member of staff to support colleagues who make a confidential report.

- 17.4 Suffolk Constabulary offers a range of options designed to give staff flexibility in the way they make confidential reports. Staff receiving reports will ensure confidentiality is respected and identify with the person reporting the most suitable method of formally recording the report.

The reporting routes for concerns will depend on the seriousness and sensitivity of the issues and who is thought to be involved. As a result, individuals may approach their Line Manager or their Head of Department/Area Commander. If an individual feels these avenues are inappropriate, they may approach Professional Standards direct.

In exceptional circumstances, if none these avenues is available or appropriate, the Independent Police Complaints Commission can be contacted direct.

- 17.5 Details of the policy and its operation are shown at Appendix E.

APPENDIX A

CODE OF CONDUCT

1 Honesty And Integrity

It is of paramount importance that the public has faith in the honesty and integrity of police officers. Officers should therefore be open and truthful in their dealings; avoid being improperly beholden to any person or institution; and discharge their duties with integrity.

2 Fairness And Impartiality

Police officers have a particular responsibility to act with fairness and impartiality in all their dealings with the public and their colleagues.

3 Politeness And Tolerance

Officers should treat members of the public and colleagues with courtesy and respect, avoiding abusive or deriding attitudes or behaviour. In particular, officers must avoid; favouritism of an individual or group; all forms of harassment, victimisation or unreasonable discrimination; and overbearing conduct to a colleague, particular to one junior in rank or service.

4 Use Of Force And Abuse Of Authority

Officers must never knowingly use more force than is reasonable, nor should they abuse their authority.

5 Performance Of Duties

Officers should be conscientious and diligent in the performance of their duties. Officers should attend work promptly when rostered for duty. If absent through sickness or injury, they should avoid activities likely to retard their return to duty.

6 Lawful Orders

The police service is a disciplined body. Unless there is good and sufficient cause to do otherwise, officers must obey all lawful orders and abide by the provisions of Police Regulations. Officers should support their colleagues in the execution of their lawful duties, and oppose any improper behaviour, reporting it where appropriate.

7 Confidentiality

Information which comes into the possession of the police should be treated as confidential. It should not be used for personal benefit and nor should it be divulged to other parties except in the proper course of police duty. Similarly, officers should respect, as confidential, information about force policy and operations unless authorised to disclose it in the course of their duties.

8 Criminal Offences

Officers must report any proceedings for a criminal offence taken against them. Conviction of a criminal offence may of itself result in further action being taken.

9 Property

Officers must exercise reasonable care to prevent loss or damage to property [excluding their own personal property but including police property].

10 Sobriety

Whilst on duty officers must be sober. Officers should not consume alcohol when on duty unless specifically authorised to do so or it becomes necessary for the proper discharge of police duty.



11 Appearance

Unless on duties which dictate otherwise, officers should always be well turned out, clean and tidy whilst on duty in uniform or in plain clothes.

12 General Conduct

Whether on or off duty, police officers should not behave in a way which is likely to bring discredit upon the police service.

APPENDIX B

STATEMENT OF COMMON PURPOSE AND VALUES

OUR DUTY

“The purpose of the police service is to uphold the law; to prevent crime; to pursue and bring to justice those who break the law; to keep the Queen’s peace; to protect, help and reassure the community.

OUR VALUES

In carrying out our duty we should act fairly and firmly with integrity, commonsense and sound judgement. We must be compassionate, courteous and patient, acting without fear or favour or prejudice to the rights of others. We need to be professional, calm and restrained in the face of violence and apply only that force which is necessary to accomplish our lawful duty.

OUR AIMS

We must strive to reduce the fears of the public and, so far as we can, to reflect their priorities in the action we take. We must respond to well-founded criticism with a willingness to change.”

APPENDIX C

Extract - Police Staff Terms and Conditions of Employment

CONDUCT

The police service expects of each member of staff conduct of the highest standard and which at all times will maintain public confidence in the conduct of police service employees.



Members of police staff should not subordinate their duty to their private interests or put themselves in a position where duty and private interests conflict. Members of staff should be permitted to undertake additional employment where this does not conflict with the interests of the police service or adversely affect their performance.

If it comes to the knowledge of a member of staff that a contract in which they have any pecuniary interest, whether direct or indirect, [not being a contract to which they are themselves a party] has been, or is proposed to be, entered into by the Force, then that member of staff should as soon as is practicable give notice in writing to the Chief Constable of their interest.

Members of staff are expected not to breach confidentiality in respect of the work of the Police Service either during the course of employment or subsequently.

Under the Rehabilitation of Offenders Act [Exceptions Order] 1975 you are required to declare any criminal convictions. Failure to disclose any criminal convictions may lead to your appointment being withdrawn/ terminated. Convictions obtained whilst employed by the Suffolk Police Authority must be declared, to Professional Standards through their line manager.

APPENDIX D

Business Interests

A General Guide

For the purpose of Regulation 8, Police Regulations, 2003, a member or relative included in their family has a business interest if:

- (i) the member holds any office or employment for hire or gain (other than as a member of the Force) or carries on any other business;
- (ii) a shop is kept or a like business carried on by the member's spouse [not being separated from them] at any premises in Suffolk, or by any relative included in their family at premises at which they reside; or
- (iii) the member, their spouse [not being separated from them] or any relative included in their family living with them holds or possesses a pecuniary interest in any licence or permit granted in pursuance of the law relating to liquor licensing, refreshment houses, betting and gambling or regulated places of entertainment.

A reference to a relative included in a member's family includes their spouse, parent, son, daughter, brother or sister.

In the broadest sense a business interest is an activity which involves a commercial gain to some party, but not necessarily to the Officer concerned. It is impossible to avoid these provisions simply by working without payment or for 'expenses'.

Police Staff

Although a member of police staff's off-duty hours are their personal concern they must not compromise their position by their private interests, or put themselves in a position where their employment and their private interests conflict. The Suffolk Constabulary will not attempt to preclude members of support staff from undertaking additional employment but any such employment must not, in the view of the Police Authority conflict with or react detrimentally to the Police Authority's interest, or in any way weaken public confidence.

Procedure

The general rule is that all police personnel who undertake an activity, or intend to do so, for which payment in cash or in kind is received should assume that it constitutes a business interest which requires to be reported.

A completed application form [available on the Professional Standards intranet page] should be forwarded via the applicant's Area Commander/Departmental Head to Superintendent - Professional Standards, who will retain a register of such applications. All applications will be considered by the Deputy Chief Constable.

Where a report contains insufficient detail, it will be returned to the individual concerned, specifying the nature of the detail required.

Where a satisfactory report is received, the applicant is entitled to a written response within 28 days.

All Reports Should Contain:

- the nature of the interest
- a precise description of the part to be played by the individual
- the proposed level of involvement
- the number of hours to be devoted to the interest
- the identification of employers and partners (these must be included where applicable)
- the identification of the premises involved, with details of ownership

In 'live entertainment' cases the type of venue involved should be described.

'Property letting' cases should include an explanation of the background and an estimate of the length of time for which the situation is likely to continue.

Individuals should note that the Chief Constable's notice will contain a requirement that any change in the interest as described must be reported. Where an interest has been approved temporarily, that requirement will take effect on the date specified in the notice, i.e. the date when it was expected to end.

Guiding Principles

The following guidelines will be applied to each application:

[i] Is the business interest likely to weaken the confidence of the public in the Suffolk Constabulary?

[ii] Is there likely to be a conflict of interest for the Individual between the Suffolk Constabulary and the proposed 'activity'?

[iii] Is the Individual likely to be unavailable for duty or work because of the business interest?

[iv] Is it likely that the business activity will adversely influence the Individual's judgement on Police matters?

[v] Is the Individual likely to be exposed to unnecessary physical harm or fatigue, potentially affecting the efficient performance of his/her duty, or rendering the Individual incapable of work and creating sickness absence?

Although any case will be considered on its merits the following provides a non-exhaustive list of examples where an interest may be deemed incompatible with an individual remaining a member of the Force, ie where it:

- has an element of Police supervision (e.g. licensed premises, taxi driver) [Police Officer only]
- would bring the Force into disrepute by publicity or otherwise
- involves investigation for other than Police purposes

- mirrors Police activity (e.g. private security)
- is concerned with the lending of money, or debt recovery
- involves 'hard selling' techniques, or selling to colleagues
- carries a significant health risk
- involves unregulated or long hours (this may contravene the Working Time Regulations)
- could lead to a situation where impartiality is compromised

Rights of Appeal

An Officer or member of police staff may appeal against the decision of the Chief Constable to the Appeals Panel of the Police Authority's Human Resource & Staff Liaison Committee. Notice must be submitted in writing to the Clerk and Treasurer to the Police Authority within ten days of receipt of the decision.

Further appeal to the Home office against a decision of the Police Authority may be made in accordance with Regulations.

Other References

- Regulation 9, Police Regulations 2003
- Police Staff handbook

APPENDIX E

Confidential Reporting

1 INTRODUCTION

- 1.1 The Constabulary is committed to the highest possible standards of openness, propriety and integrity. In line with that commitment, staff with concerns about any aspects of professional standards are encouraged to come forward and voice their concerns. This policy aims to create a climate where staff feel a genuine obligation to openness and transparency when reporting breaches of professional standards. Their motivation should arise from a desire to maintain the integrity of the police service and with the knowledge that such action will be universally acknowledged as right.
- 1.2 This policy complements but does not replace the following existing policies and procedures:
- Fairness at Work Procedure
 - Complaints & Discipline Procedures [Police [Complaint & Misconduct] Regulations 2004 and Police [Conduct] Regulations 2004]
 - Police Staff - Capability and Disciplinary Procedures
 - Unsatisfactory Performance Procedures [Police (Efficiency) Regulations 1999]
 - Public Interest Disclosure Act 1998

2 DEFINITIONS

Breaches of professional standards include criminal activity, unethical behaviour, breaches of the “Codes of Conduct”, malpractice and dishonesty.

2.1 CORRUPTION

Is the abuse of a role or position held for personal gain or gain for others.

2.2 DISHONESTY

Is behaviour lacking in personal honesty which includes theft, lying and cheating.

2.3 UNETHICAL BEHAVIOUR

Is behaviour which does not conform with our statement of common purpose and values and the code of conduct for police officers.

Intentional neglect of duty or responsibilities are included in the above definitions as are racist and sexist behaviour.

All staff have a clear responsibility to report suspected corrupt, dishonest or unethical behaviour by others.

3 PUBLIC INTEREST DISCLOSURE ACT 1998

- 3.1 The aim of the Public Interest Disclosure Act is to ensure that information in the public interest is brought to the attention of the appropriate person in order that wrong doing can be dealt with speedily. It encourages disclosure of information by giving statutory protection against victimisation and unfair dismissal to individuals who make protected disclosures in good faith about certain acts of wrongdoing or dangers in the workplace.
- 3.2 The Act applies to all police personnel.
- 3.3 The following disclosures are covered by the Act:
- information relating to a criminal offence
 - the breach of a legal obligation
 - a miscarriage of justice
 - a danger to the health and safety of an individual
 - damage to the environment
 - deliberate covering up of information in respect of any of the above
- 3.4 The policy for confidential reporting will apply in respect of any disclosure covered by the Act.

4 PRINCIPLES AND POLICY

- 4.1 Individual members of staff will often be the first to realise there may be something seriously wrong within the organisation. However, they may feel reluctant to express their concern because they feel to do so would be disloyal to colleagues or they may not be able to fully justify their suspicions. They may also fear harassment or victimisation.
- 4.2 The Suffolk Constabulary encourages all staff with concerns about any aspect of work to come forward and voice those concerns without fear of reprisals of any kind. The Constabulary recognises that the decision to report a concern can be a difficult one to make. The Constabulary will not tolerate harassment or victimisation and will take action to protect individuals when concerns are raised in good faith.
- 4.3 It is also the responsibility and duty of every member of staff to support any colleague who bring their concerns to notice.

5 CONFIDENTIALITY

- 5.1 Open reporting is always encouraged but confidentiality, when requested, will be respected. Staff should be aware that legal rules covering disclosure apply to cases under this procedure. Where confidential information has been received, this will be handled for disclosure purposes in a similar way to criminal intelligence.

6 ANONYMOUS ALLEGATIONS

- 6.1 Concerns expressed anonymously are much less powerful and any subsequent investigation can be seriously hampered by identity being withheld. It may not always be possible or appropriate to react to anonymous allegations.
- 6.2 The Professional Standards Section should be consulted whenever an anonymous allegation is received. In deciding what the response should be, account will be taken of the following factors:
- the seriousness of the issues raised
 - the credibility of the concern
 - the likelihood of confirming the allegation from attributable sources

7 HOW TO RAISE A CONCERN

- 7.1 Clearly, the nature and seriousness of the issues raised will dictate the most appropriate way to bring such concerns to notice.
- 7.2 DIRECT TO IMMEDIATE MANAGEMENT

This method has always been available to staff with concerns and reports may be made verbally or in writing. It has the advantage of enabling an immediate response where appropriate and direct feedback to the individual.

7.3 Line managers need to clearly identify when they are dealing with a disclosure covered by this policy. In cases of doubt about how to treat a report, advice should be sought from the Professional Standards Section.

7.4 DIRECT TO AREA COMMANDER/DEPARTMENTAL HEAD

Where the breach of professional standards is believed to involve a person's line manager, it will be more appropriate to report it to another manager. Issues of this nature can be reported to the Area Commander/Departmental Head/Head of Professional Standards.

7.5 DIRECT TO THE PROFESSIONAL STANDARDS SECTION

Contact may be made in writing, by e-mail or by a personal face-to-face meeting. Such an approach will be dealt with by staff experienced in dealing with cases involving allegations of breaches of professional standards.

7.6 IN FORCE CONFIDENTIAL REPORTING FACILITIES

Professional Standards maintain a dedicated confidential telephone line (ext 3845) used exclusively for confidential reporting. Calls will be handled confidentially by a restricted number of trained staff within the Professional Standards Section. Reports can also be made anonymously or other wise, via a facility on the Professional Standards intranet page. Details of this facility are widely advertised throughout the Constabulary.

7.7 This may be felt to be a particularly appropriate method of reporting where a high degree of sensitivity/confidentiality is required from the outset.

7.8 DIRECT TO THE IPCC

In exceptional circumstances, individuals may approach the Independent Police Complaints Commission direct.

7.9 INTERNAL AUDIT

In order to comply with the Police Authority Financial Regulations, any suspected or actual fraud will always be notified to the Treasurer [internal auditor] to the Authority. Initial enquiries will be made to decide whether an investigation is appropriate and what form it should take.

8 HOW THE CONSTABULARY WILL RESPOND

8.1 This policy recognises the diversity in the nature and circumstances of confidential reporting and the fact that no one response will be appropriate to all circumstances. All action will, however, conform to accepted basic principles.

- 8.2 The policy will be administered by the Professional Standards who should be consulted at an early stage to decide upon the most appropriate course of action. That action may be a decision to:
- investigate locally
 - investigate centrally
 - appoint an external investigator
 - refer to the internal or external auditor
- 8.3 Some concerns may be resolved by agreed action without the need for investigation.
- 8.4 The amount of contact between those considering the issues and the member of staff who raises the concern, will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided.
- 8.5 The person making the report will be given details of a named individual who will be dealing with their concern. They may contact that person at any time in connection with the matter. The named person has a responsibility to keep parties updated on the progress of any investigation. Every effort will be made to keep the individual informed of progress. The only exception to this will be in those cases of extreme sensitivity where the nature and methods of the enquiry need to be protected.

- 8.6 The general principle will be that there will be complete openness between those charged with the investigation of the concern and the person making the concern known.

9 ROLE OF LINE MANAGEMENT

- 9.1 Line management will ensure this policy is complied with. They will create an environment where members of staff are confident to come forward and make reports and ensure that environment is developed and maintained.
- 9.2 Where the identity of an individual is known to colleagues, they will respond promptly, genuinely and with sensitivity to ensure individual's actions are acknowledged as right. Their approach to them should be both supportive and positive.
- 9.3 Line Management should provide protection from victimisation or harassment and take positive and robust action where this occurs.

10 ROLE OF THE PROFESSIONAL STANDARDS SECTION

- 10.1 The Professional Standards Section will undertake the following responsibilities:
- provide support, guidance and advice at every stage of the process
 - monitor the progress of each reported case
 - ensure confidentiality issues are properly handled in accordance with this policy

11 ROLE OF INTERNAL FINANCIAL AUDIT

11.1 When abuse of Police Authority funds is alleged or suspected, the Financial Services Manager will be notified who will ensure the Police Authority Treasurer and Internal Audit are informed. The Financial Services Manager will, as appropriate, ensure that internal audit:

- liaise with the Professional Standards Section
- provide support, guidance and advice as appropriate
- monitor the progress of each case
- recommend adequate controls to ensure compliance with the policy and in particular, ensure confidentiality
- identify and disseminate best practice with regards to financial systems and controls

12 FALSE AND MALICIOUS ALLEGATIONS

12.1 Every effort will be made to ensure the integrity and accuracy of information is fully investigated. In all cases, but especially where the information is anonymous, evidence or other intelligence will be sought at the earliest opportunity to corroborate the information received. Where it is established a report was made maliciously, consideration will be given to disciplinary/misconduct action.

12.2 An allegation made in good faith is never wrongly made just because it is not confirmed by the investigation.