HMICFRS

His Majesty's Inspectorate of Constabulary
and Fire & Rescue Services

National Crime Agency inspection

Vetting and anti-corruption part 2:
How effective is the National Crime
Agency at dealing with corruption?

Contents

Summary

The National Crime Agency (NCA) is the UK's lead agency in the fight against serious and organised crime. It manages intelligence and information that requires the highest levels of security. It provides sensitive intelligence and covert tactics to UK law enforcement.

This is the second part of our inspection of the NCA's ability to deal with corruption.

This report considers the NCA's effectiveness and efficiency in helping and working with police forces and other law enforcement agencies to identify and tackle corruption involving police officers and staff.

We found that the NCA's anti-corruption unit (ACU) investigates to a good standard and uses covert tactics when necessary. The NCA works well with police forces and other law enforcement agencies to help them identify and investigate corruption.

The ACU could allocate and prioritise work more effectively

When the NCA implements the outstanding recommendations from part 1 of this inspection, demand on the ACU will increase. The recommendations require the NCA to introduce its own IT, monitoring software and confidential reporting facility. This may mean that the NCA won't be able to give forces the same level of support in future, without an increase in its resources.

We didn't find any recorded evidence of effective processes for prioritising or allocating the ACU's work. The ACU needs to improve how it prioritises the support it provides, and how it assesses the risk of investigations it adopts. This will help it to make better decisions about how to use its resources.

Resourcing and future demand on the ACU

The NCA has assessed the potential increase in internal demand caused by implementing the recommendations from part 1 of this inspection. Senior leaders in the NCA need to make sure its ACU and professional standards unit have enough resources to meet this demand.

The Threat to UK Law Enforcement from Corruption

The NCA is responsible for preparing the national strategic threat assessment (STA) of corruption in law enforcement. This is based on the intelligence and data from the individual STAs of each police force and regional organised crime unit (ROCU). The NCA also produces its own internal STA.

These are important documents, as they identify the types of corruption categories that pose the biggest risk to law enforcement. We were concerned to find that the NCA didn't use these documents to prioritise risk or deploy ACU resources. The NCA must improve its use of both national and internal STAs.

Suspicious activity reports

Suspicious activity reports (SARs) alert law enforcement agencies to possible instances of money laundering or terrorist funding. The NCA's UK Financial Intelligence Unit (UKFIU) has national responsibility for receiving and analysing intelligence from SARs, and sending it to police forces.

When a SAR identifies the involvement of a police officer, the UKFIU refers it to the relevant force. UKFIU requests feedback from forces on the action taken and outcome of the SAR. But they rarely receive a response. We think this is important information and forces should provide the updates as requested. This information would help the NCA to develop a better understanding of the scale of corruption in police forces.

The handling of corruption-related intelligence would benefit from national co-ordination

The NCA doesn't have access to all the corruption-related intelligence that police forces hold. No single organisation has responsibility for such intelligence. Establishing a national co-ordination centre for corruption-related intelligence could improve the how the threat is managed in relation to corruption and would improve the accuracy of the strategic threat assessment.

Recommendations

We have made five recommendations. They are:

Recommendation 1

With immediate effect, the National Crime Agency should develop and implement an effective process for prioritising and allocating work for the cases its anti-corruption unit adopts.

Recommendation 2

By 30 June 2024, the National Crime Agency should review resource levels in the anti-corruption and professional standards units, to make sure that they can meet the projected increase in demand for their services.

Recommendation 3

With immediate effect, the National Crime Agency should make sure that its national and internal strategic threat assessments are used to allocate resources within its anti-corruption unit.

Recommendation 4

By 30 June 2024, chief constables should make sure they tell the National Crime Agency the outcome of investigations into suspicious activity reports relating to their force's personnel. The National Crime Agency should include a summary of this information in its annual national strategic threat assessment, *The Threat to UK Law Enforcement from Corruption*.

Recommendation 5

By 30 September 2024, the Home Office, working with the National Crime Agency, the National Police Chiefs' Council and the Independent Office for Police Conduct, should examine the feasibility of establishing a national co-ordination centre for intelligence relating to corruption in police forces and other law enforcement agencies.

Introduction

About us

His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) independently assesses the effectiveness and efficiency of police forces, fire and rescue services, and some other law enforcement agencies, in the public interest. In preparing our reports, we ask the questions the public would ask and publish the answers in an accessible format. We use our expertise to interpret the evidence and make recommendations for improvement.

Section 11 of the Crime and Courts Act 2013 requires us to inspect the NCA. Following an inspection, we must report to the Home Secretary on the agency's efficiency and effectiveness.

About the NCA

The NCA is responsible for leading, supporting, and co-ordinating the approach to serious and organised crime. It has two statutory functions, specified and explained in part 1 of the Crime and Courts Act 2013: the crime-reduction function and the criminal intelligence function. The NCA has approximately 5,500 personnel.

The NCA supports police forces and other law enforcement agencies. This support can come from various parts of the NCA, including its intelligence and investigations directorates and its integrated protective security department, which was created in 2022. The integrated protective security department has three teams: a vetting unit, an ACU and a professional standards unit.

The ACU is responsible for preventing, identifying and investigating potential corruption within the NCA. It is also responsible for co-ordinating the NCA's response when police forces ask for help with corruption-related investigations. All police forces have similar units to the NCA's ACU, usually called counter-corruption units or CCUs. These work closely with the ACU from time to time.

Our inspection

This is the second part of a two-part inspection, which examines how effectively the NCA deals with the threat of corruption.

In part 1 (*Vetting and anti-corruption part 1: How effective is the National Crime Agency at dealing with corruption?*), we examined how well the NCA:

- vets its officers (including candidates wishing to become officers);
- identifies and prevents potential corruption, and how well it investigates corruption among its officers; and
- identifies and prevents improper behaviour by its officers, including gender-based prejudice.

Terms of reference for part 2

In part 2 of this inspection, we examined how well the NCA:

- helps police forces and other law enforcement bodies to identify corruption; and
- works with them to tackle it.

Methodology for part 2

Our inspection took place in January 2023. We visited NCA teams in London and Warrington. We spoke to personnel at different grades in the units relevant to this inspection and carried out reality testing.

We interviewed NCA personnel who are responsible for collecting and analysing corruption-related intelligence and for passing it on to police and other law enforcement agencies. We also carried out interviews in some police forces and ROCUs.

We went to NCA premises to view case material and examine data. While there, the NCA provided confidential briefings to us about investigations involving sensitive techniques.

We carried out:

- a review of confidential case material, and corruption-related data;
- an intelligence file review in which we examined 17 case files where the NCA had shared intelligence with police forces;
- a review of the ACU's anti-corruption case register (this is a list of cases that the ACU has supported);
- a review of the NCA's progress against recommendations made in part 1 of this inspection;

- a review of the NCA's Annual Plan 2022-23 and its policies and procedures relating to corruption and vetting; and
- a review of the NCA's national STA, entitled The Threat to UK Law Enforcement from Corruption 2021 (unpublished).

The corruption context

The College of Policing's unpublished authorised professional practice (APP) on Counter-Corruption (Intelligence) specifies 12 corruption categories:

- infiltration;
- disclosure of information;
- perverting the course of justice;
- sexual misconduct;
- controlled drug use and supply;
- theft and fraud;
- misusing force systems;
- abuse of authority;
- inappropriate association;
- vulnerability;
- commit, incite, aid and abet, or assist an offender in the commission of a crime; and
- other [corruption-related intelligence not categorised elsewhere].

The NCA has an important role to play in helping the police and other law enforcement agencies tackle corruption.

Terminology in this report

Our reports contain references to, among other things, 'national' definitions, priorities, policies, systems, responsibilities and processes.

In some instances, 'national' means applying to England and Wales. In others, it means applying to England, Wales and Scotland, or the whole of the United Kingdom.

How effective is the NCA in helping police forces and other law enforcement agencies to identify corruption?

This section covers:

- NCA policies and procedures to help tackle corruption in police forces;
- how memorandums of understanding are used to work with other agencies;
- how the ACU could allocate and prioritise work more effectively;
- the level of ACU resourcing;
- how the NCA understands future demand in the ACU; and
- the use of sensitive intelligence to assess the threat from corruption.

The NCA has policies and procedures to help tackle corruption in police forces

The NCA has policies and standard operating procedures that cover all aspects of the ACU's work. During our inspection, we read these documents and found that they are up to date, fit for purpose, and reviewed regularly. From comments we heard in interviews and focus groups, and observations we made during our reality testing, we concluded that they were well understood and that NCA personnel readily adopted them.

Memorandums of understanding

The NCA has memorandums of understanding (MOUs) with some law enforcement organisations that it works with, including several police forces. These cover situations where NCA resources, including the ACU, are supporting investigations in those forces and organisations. Although the MOUs aren't legally enforceable, they can be helpful in defining an investigation's purpose and each organisation's role in it. This particularly applies to large-scale, complex cases, and those that carry a high degree of risk. The NCA should consider using MOUs with other organisations that require support for investigations.

The ACU could allocate and prioritise work more effectively

The ACU keeps a register of all the corruption investigations it supports. Some of these relate to potentially corrupt NCA or police personnel. Others involve law enforcement personnel in other public bodies. The register holds details of the type of corruption involved, the nature of the investigation, the resources allocated to it, and the NCA's operational decisions during the investigation.

We examined the ACU register and selected 17 corruption investigations from 2022 to review. In most of these cases, the NCA provided counter-corruption intelligence it had gathered using covert techniques. We assessed whether:

- the categorisation of the alleged corruption was in line with APP;
- investigators recorded operational decisions (for example, when and how they deployed covert resources);
- the NCA had an investigative strategy;
- operational decisions followed the strategy; and
- there was evidence of an effective prioritisation process based on threat, risk and harm.

The investigations we reviewed in the register demonstrated the breadth of support the NCA provides to other agencies and police forces. They included investigations into police personnel, contract workers, prison officers and personnel in an overseas law enforcement agency.

In general, we found the register to be a comprehensive record of the NCA's contribution to the investigations. Entries included clear rationales for using covert techniques and showed that NCA personnel used innovative approaches to solve problems.

However, we found a record of threat, risk and harm being used to decide whether to adopt the investigation, and to judge how high a priority it was, in only 1 of the 17 cases we looked at.

Police forces in England and Wales use the management of risk in law enforcement process to assess the levels of threat, risk and harm presented by suspects in an investigation. ACU staff told us that they don't use this process because it isn't effective for assessing the levels of threat, risk and harm presented by corrupt NCA or police officers. We were unconvinced by this justification.

The ACU should base its decisions about when and how to support police forces on a full consideration of the severity of the allegation, the strength of suspicion and the reliability of the intelligence. But we found that, in most of the cases we examined, these decisions were based on previous professional relationships between personnel in the ACU and the requesting force. This isn't an effective means of allocating NCA resources.

The lack of effective prioritisation and oversight is clear in the work the NCA carries out for Border Force. Border Force doesn't have a department responsible for tackling corruption allegations against its personnel, so the ACU investigates all these cases. Most vetting work is carried out by ACU personnel working overtime, which relies on the goodwill of its staff agreeing to work extra hours. This is an ineffective way to manage demand. It should form part of a formal process for assessing and prioritising all of the ACU's work. This would make sure that resources could be reliably and consistently allocated, rather than depending on staff goodwill.

At present, the NCA's register of corruption investigations doesn't include instances where a request for assistance has been declined. We think it should. This would provide the NCA with a better understanding of the demand for its services and how effectively it prioritises its response.

The ACU needs an effective process to make sure that corruption investigations are properly risk-assessed and prioritised against each other. This should help the ACU to make better decisions about how to use its resources.

Recommendation 1

With immediate effect, the National Crime Agency should develop and implement an effective process for prioritising and allocating work for the cases its anti-corruption unit adopts.

ACU resourcing should be reviewed

At the time of our inspection the ACU had 39 posts, of which 8 were vacant. ACU managers have requested that additional posts be created in the 2023/24 financial year and during the course of the inspection were running campaigns to recruit more personnel. Resources are likely to become increasingly important as demand on the ACU increases. The NCA needs to make sure that the ACU has enough resources to meet current and future demand.

Future demand

In part 1 of this inspection (*Vetting and Anti-corruption Part 1: How effective is the National Crime Agency at dealing with corruption?*), we recommended that, by December 2022, the NCA should have IT monitoring in place for all its core systems. The ability to use IT monitoring to gather intelligence can help to identify corrupt individuals. It can be particularly useful for identifying the irregular use of systems and their use by personnel who are of concern to the NCA.

We also recommended that, by March 2023, the NCA should make sure it has an effective confidential reporting system that is accessible to all personnel, so that those reporting allegations can be confident that their identity will be protected.

NCA personnel told us that they now have the software needed to address both recommendations.

The NCA has bought a new confidential reporting tool for internet-enabled personal devices. This will provide anonymity and will be available to all staff to report concerns about their colleagues. However, this tool hadn't yet been introduced at the time of our second inspection. The NCA's dedicated phone line and email address, similar to systems available in police forces, remains in use for personnel who wish to report concerns about their colleagues. However, these don't offer anonymity to the NCA staff using them.

The NCA plans to resolve these problems and install the software by the end of 2023. We are satisfied with the level of priority the NCA has given to these recommendations.

We were pleased to find that the NCA has carried out a data-modelling exercise to assess future demand on the ACU. The exercise estimated the increase in demand the NCA will face when it completes the above recommendations. It based this on the extra demand faced by a police force of a similar size to the NCA when it introduced IT monitoring and confidential reporting processes.

The recommendations we made in our report *An inspection of vetting, misconduct and misogyny in the police service* were intended to improve how law enforcement bodies deal with corruption. Not all these recommendations applied to the NCA, but it has looked at all the recommendations and implemented the ones that were relevant.

The implementation of these recommendations may also increase the internal demand on the ACU and professional standards unit. This may limit their ability to support police forces and other agencies. Senior leaders in the NCA need to make sure they have the resources to meet future demand.

Recommendation 2

By 30 June 2024, the National Crime Agency should review resource levels in the anti-corruption and professional standards units, to make sure that they can meet the projected increase in demand for their services.

Sensitive intelligence is an effective means to tackle corruption

Sometimes, the NCA identifies sensitive intelligence about corrupt law enforcement personnel. Sensitive intelligence includes intelligence gathered from targeted interception, targeted equipment interference and covert human intelligence sources. In our report *A shared confidence: A summary of how law enforcement agencies use sensitive intelligence*, we defined sensitive intelligence as:

> "Intelligence collected by covert means that requires authorisation under a specific legal framework – for example, the Regulation of Investigatory Powers Act 2000 or the Investigatory Powers Act 2016. This includes intelligence obtained from covert human intelligence sources, from surveillance activity or by technical means. This may include intelligence classified under government security classifications as secret."

The NCA leads on targeted interception and provides this sensitive capability for police forces to use. Larger police forces tend to manage their own corruption investigations and can deploy some covert resources without the help of the NCA. However, some smaller forces need the NCA's support when they wish to use sensitive intelligence-gathering techniques. Other NCA investigations into organised crime or serious incidents often gather corruption intelligence as a by-product of the main investigation.

During our interviews and focus groups, we found that NCA personnel understood the threat posed by corruption. They also understood the processes they should follow to efficiently share relevant intelligence with the correct force or agency.

The NCA always evaluates the intelligence it receives to make sure that different police forces or agencies aren't investigating the same incidents independently of one another. Law enforcement agencies refer to this process as deconfliction.

In our examination of the NCA register and the limited cases that we reviewed, we found that all of the cases had received appropriate deconfliction. This leads us to believe that the NCA usually does this well.

How well does the NCA work with police forces and other law enforcement agencies to tackle corruption?

This section covers:

- relationships with police forces;
- *The Threat to UK Law Enforcement from Corruption* 2021;
- suspicious activity reports;
- access to intelligence relating to police corruption could be improved;
- law enforcement agencies are well supported by the NCA; and
- prejudicial and improper behaviour.

Relationships with police forces

During our inspection, we visited six police forces, one ROCU and Border Force. Without exception, everyone we interviewed described a good relationship between their organisation and the NCA. Interviewees were complimentary about the support the NCA provided, especially where it involved the use of sensitive intelligence-gathering techniques.

The Threat to UK Law Enforcement from Corruption 2021

Since 2019, the NCA has produced an annual national STA called The Threat to UK Law Enforcement from Corruption (unpublished). We examined the 2021 version.

The STA is commissioned to inform the work of the National Police Counter- Corruption Advisory Group. It addresses the following questions:

- What is the nature and scale of the corruption threat facing UK police forces and other law enforcement agencies?
- What are the corruption priorities, emerging threats and associated vulnerabilities, risks and enablers, including themes involving more than one service, to be considered against current and future responses?

All police forces and other law enforcement agencies should use the national STA as a basis for assessing the risk they face from corruption.

The national STA is based on the intelligence and data each police force and ROCU provides in its own STAs. The NCA also produces a similar STA for its internal use. (Like the national STA, this isn't published.)

These are important documents, as they identify the corruption categories that pose the biggest risk to law enforcement. Forces and law enforcement agencies should use STAs to target identified corruption threats.

We expected the NCA to use the documents it produces to prioritise risk and deploy ACU resources accordingly. However, as mentioned earlier in this report, we couldn't find any evidence that this was happening. This is concerning.

The NCA should improve the way it uses both the national and its internal STA.

Recommendation 3

With immediate effect, the National Crime Agency should make sure that its national and internal strategic threat assessments are used to allocate resources within its anti-corruption unit.

As we explain later in this report, there are also opportunities to improve the information available to the NCA when producing the national STA.

Suspicious activity reports

SARs alert law enforcement bodies to potential instances of money laundering or terrorist funding. These are usually submitted by banks and other financial institutions, but members of the public can also submit them. The NCA's UKFIU has national responsibility for receiving and analysing SARs, and for sending intelligence from them to police forces.

SARs are a good source of intelligence, not only about economic crime but also other criminal activity, including corruption. The UKFIU told us that it received 901,255 SARs in the 12 months ending on 31 March 2022. This equates to approximately 2,400 a day.

The creator of the SAR may identify the involvement of a police officer. However, they may not identify the involvement of non-officer police staff or family members. This is because the personal details recorded on the SAR may specify the individual's role but not their employer. On the few occasions when police officers are the subject of a SAR, the UKFIU refers the matter to the professional standards department in the relevant force. But the UKFIU couldn't tell us how many of these referrals it makes.

Although SARs relating to police personnel can indicate potential corruption, the UKFIU believes that most relate to other concerns about financial vulnerability – for example, where a member of police personnel is a victim of fraud.

The UKFIU doesn't investigate or develop SARs – it is for individual forces to decide what action they should take, if any.

The UKFIU asks forces to update it on the outcome of every SAR sent to them. But we were told that forces rarely respond. As a result, the UKFIU can't establish how many SARs relating to police personnel have provided evidence of actual or potential corruption. We think that this is important information that would help the NCA to better understand the scale of corruption in police forces.

The NCA may be able to do more to look for indirect links between 'non-police' SARs and police personnel. For example, a corrupt officer might try to launder money by using a family member, someone living at the same address, a known criminal associate, or a business with which they are connected. Police forces operate 'notifiable association' and 'business interest' policies, which we discuss in more detail later in this report. These may hold relevant information on individuals. However, we recognise that analysing non-police SARs against this information might be difficult for the NCA both technically and in terms of resources.

Recommendation 4

By 30 June 2024, chief constables should make sure they tell the National Crime Agency the outcome of investigations into suspicious activity reports relating to their force's personnel. The National Crime Agency should include a summary of this information in its annual national strategic threat assessment, *The Threat to UK Law Enforcement from Corruption*.

Access to intelligence relating to police corruption should be improved

Part 1 of the Crime and Courts Act 2013 requires the NCA to "have the criminal intelligence function of gathering, storing, processing, analysing, and disseminating information" that is relevant to combatting organised, serious or any other kind of crime.

The NCA's role in producing the annual national STA is one way it fulfils this function. However, the NCA doesn't have direct access to the information provided by forces or ROCUs in their individual STAs.

Furthermore, the NCA can't access corruption-related intelligence held by police forces on internal counter-corruption intelligence databases. Instead, the NCA must rely on police forces sharing the intelligence with them. The NCA can't access this information through the Police National Database (PND), because corruption-related intelligence isn't uploaded to it.

For these reasons, the NCA is unable to develop an overall picture of corruption-related intelligence in UK law enforcement. The NCA should work with policing and the wider public sector to establish a national co-ordination centre for corruption-related intelligence.

The PND could be used more effectively

When information is known about a member of police personnel or their friends and family which may present a risk, such as involvement in criminal activity or financial concerns, this is known as adverse information. Adverse information may become known during the vetting process. Some types of adverse information present greater risks and are therefore of greater concern than others.

The use of the PND is regulated by the [Code of practice on the operation and use of the Police National Database](). In paragraph 2.1, the code states that the PND is to be "used solely for policing purposes", which are defined as: "protecting life and property; preserving order; preventing the commission of offences; bringing offenders to justice; and any duty or responsibility of the police arising from common or statute law."

We have no doubt that tackling corruption among law enforcement personnel comes within that definition.

In our report *An inspection of vetting, misconduct, and misogyny in the police service*, we recommended that chief constables should make routine use of the PND as a tool for revealing any unreported adverse information about officers and staff. Recommendation 16 of the report required that:

> By 31 December 2023, chief constables should make routine use of the Police National Database (PND) as a tool for revealing any unreported adverse information about officers and staff. To help this, the College of Policing should:
>
> • working with the National Police Chiefs' Council lead for counter-corruption, change the Counter-Corruption (Intelligence) APP to include a requirement for the PND to be used in this way; and
>
> • change the PND Code of Practice (and any subsequent code of practice concerning the Law Enforcement Data System) to include a specific provision that allows for the PND to be used in this way.

We believe that the NCA has a role to play in implementing this recommendation. We encourage the NCA to work with the National Police Chiefs' Council and the College of Policing as they establish the information that should be recorded on the PND.

Corruption-related intelligence gathered during vetting processes and annual integrity reviews

In our vetting, misconduct and misogyny report, we provided a detailed explanation of the vetting process for police personnel.

In doing so, we referred to the Vetting Code of Practice, the APP on Vetting and the unpublished Counter-Corruption (Prevention) APP. These documents set out the processes that police forces should follow when vetting their personnel.

But vetting is based on a snapshot in time. Given the length of time between vetting renewals, clear and concise policies are required to help prevent corruption. The Counter-Corruption (Prevention) APP sets out what counter-corruption policies forces should have and gives guidance on their content.

Although the APP provides guidance on several potential areas of policy, in our vetting, misconduct and misogyny inspection, we specifically examined forces' policies on:

- gifts and hospitality (covering the circumstances in which police officers and staff should accept or reject offers of gifts and/or hospitality);

- business interests (covering when the force should allow or deny officers and staff the opportunity to hold other jobs and how the force will manage the risks that arise when they are allowed to hold them); and

- notifiable associations, which are known as potentially compromising individuals in the NCA (covering how the force should manage the risks associated with officers and staff who may associate with, for example, criminals, private investigators, or members of extremist groups and require the disclosure by officers and staff of such associations).

To make sure they comply with these policies, some forces have introduced an annual integrity review, during which supervisors discuss corruption policies and other risks with members of their teams. In these reviews, supervisors ask if there have been any changes to an individual's personal circumstances. They also check for any changes to recorded business interests or notifiable associations.

We concluded that all forces should carry out an annual integrity review or 'health check' for all officers and staff. Recommendation 43 requires that:

> By 30 April 2023, chief constables should make sure that a robust process is in place for completing annual integrity reviews for all officers and staff.

Once forces have implemented recommendation 43, the amount of corruption-related intelligence recorded may increase. However, collection is only the first step – co-ordination is also required.

The handling of corruption-related intelligence would benefit from national co-ordination

In our interviews with police forces and NCA personnel, we were repeatedly told of the need for a co-ordinated approach to corruption.

At the time of our inspection, each police force in England and Wales remained responsible for managing its own corruption-related intelligence. And, as we have stated, no single organisation has responsibility for co-ordinating this intelligence.

We have seen in other areas of policing that a single co-ordinating process can improve the management of a particular threat. An example is the County Lines Co-ordination Centre. Funded by the Home Office, this is a collaboration between the National Police Chiefs' Council and the NCA. We think that this approach could be adopted to co-ordinate and improve the approach to corruption.

For example, access to police intelligence about notifiable associations (or 'potentially compromising individuals') could help the NCA to monitor attempts by organised crime groups or other bodies to infiltrate police forces and law enforcement agencies.

> **Recommendation 5**
>
> By 30 September 2024, the Home Office, working with the National Crime Agency, the National Police Chiefs' Council and the Independent Office for Police Conduct, should examine the feasibility of establishing a national co-ordination centre for intelligence relating to corruption in police forces and other law enforcement agencies.

## Law enforcement agencies are well supported by the NCA

The ACU has the people, expertise and equipment to carry out complex anti-corruption investigations, using a wide range of covert tactics such as surveillance, targeted interception and covert human intelligence.

Personnel from all the organisations that we spoke with told us that the NCA does a good job of supporting them. This support includes providing investigative strategies and tactical advice to investigate allegations of corruption. Occasionally, the NCA will lead an investigation.

The NCA provided us with data that illustrates the breadth of organisations that it supports.

National Police Chiefs' Council forces are the main recipients of NCA counter-corruption intelligence logs. All the NCA's intelligence-gathering departments provide intelligence logs, not just the ACU. In 2021, the NCA sent 162 individual corruption-related intelligence logs to police forces. Each of these intelligence logs could contain multiple items of intelligence.

Figure 1: NCA anti-corruption unit casework by support partner in 2021
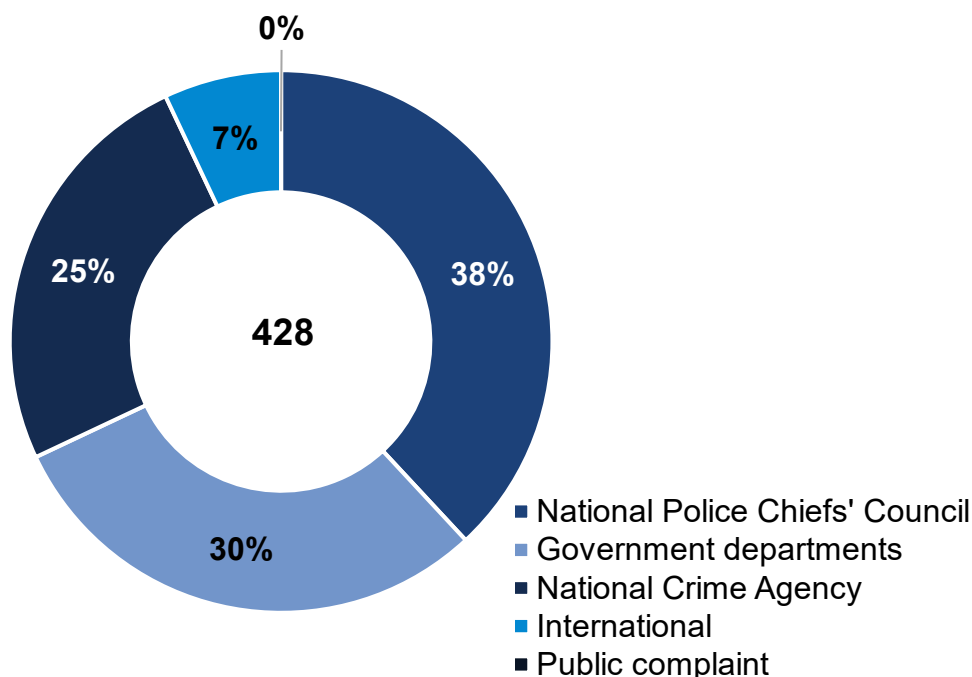
Source: National Crime Agency

Prejudicial and improper behaviour

In our report *An inspection of vetting, misconduct, and misogyny in the police service*, we defined prejudicial and improper behaviour as:

"any attitude and/or behaviour demonstrated by a police officer or police staff that could be reasonably considered to reveal misogyny, sexism, antipathy towards women or be an indication of, or precursor to, abuse of position for a sexual purpose.

It may include, but is not limited to inappropriate, crude or offensive comments; telling sexualised jokes; asking intrusive questions about someone's private life; inappropriate touching; abusive, manipulative, coercive, controlling or predatory behaviour; bullying and harassment; and any other type of behaviour that may give cause for concern over whether a person is fit to serve as a police officer or as police staff."

We were pleased to find that staff in the various intelligence-gathering departments in the NCA were aware of the definition of prejudicial and improper behaviour. And they understood the risks this presents to law enforcement. During interviews and focus groups, staff provided examples of intelligence that they had identified relating to this behaviour. This included instances of law enforcement personnel abusing their position for a sexual purpose and of police officers using sex workers.

NCA personnel identified this intelligence as a by-product of other operational activity they were carrying out. It is reassuring that staff identified and recorded this intelligence and passed it on to the relevant agency or force for further investigation.