



Policy Name: Counter Corruption and Reporting Wrongdoing Policy Framework

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Implementation Date: 15th April 2019

Replaces the following documents (e.g. PSIs, PSOs, Custodial Service Specs) which are hereby cancelled:

- PSI 01/2016 Corruption prevention – how to identify, report and manage staff corruption in prisons and headquarters
- PI 05/2016 – Corruption prevention – how to identify, report and manage staff corruption in the National Probation Service
- PSI 21/2013 - Reporting wrongdoing
- PI 41/2014 – NPS reporting wrongdoing

Introduces amendments to the following documents:

Action required by:

| | | | |
|-------------------------------------|--------------------------------------------------------|-------------------------------------|------------------------------------------------|
| <input checked="" type="checkbox"/> | HMPPS HQ | <input checked="" type="checkbox"/> | Governors |
| <input checked="" type="checkbox"/> | Public Sector Prisons | <input checked="" type="checkbox"/> | Heads of Group |
| <input checked="" type="checkbox"/> | Contracted Prisons | <input checked="" type="checkbox"/> | CEOs Community Rehabilitation Companies (CRCs) |
| <input checked="" type="checkbox"/> | National Probation Service | <input checked="" type="checkbox"/> | HMPPS-run Immigration Removal Centres (IRCs) |
| <input checked="" type="checkbox"/> | HMPPS Community Interventions Contract Management Team | <input checked="" type="checkbox"/> | Under 18 Young Offender Institutions |
| <input checked="" type="checkbox"/> | Other providers of Probation and Community Services | <input checked="" type="checkbox"/> | Prisoner Escort & Custody Services |

Mandatory Actions: All groups referenced above must adhere to the Requirements section of this Policy Framework, which contains all mandatory actions.

For Information: Governors¹ and Local Delivery Unit Heads / Heads of Departments must ensure that any new local policies that they develop because of this Policy Framework are compliant with relevant legislation, including the Public-Sector Equality Duty (Equality Act, 2010).

How will this Policy Framework be audited or monitored: Governors of prisons and the and Local Delivery Unit Heads for the National Probation Service will monitor compliance with the mandatory actions in this Policy Framework. HMPPS Contract Management Teams will monitor compliance with the mandatory actions in this Policy Framework for contracted service providers.

¹ In this document the term Governor also applies to Directors of Contracted Prisons.

Resource Impact: No additional costs are expected from this policy change. It has been designed on the basis of a cost-neutral approach to improving the efficiency and effectiveness of existing resource.

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1. Purpose

- 1.1. HMPPS' efforts to tackle corruption are integral to delivering a safe and secure prison and probation service – for staff, offenders and the community. Corruption facilitates the flow of drugs, mobile phones and other illicit items into prisons. These, in turn, fuel violence, debt and the illicit economy. Corruption puts the safety of offenders, staff and visitors to prisons at risk; damages the reputation of the organisation; reduces workforce morale and performance; and compromises confidence in HMPPS' ability to run safe and secure prison and probation services that protect the public and rehabilitate offenders.
- 1.2. We have a clear strategy for tackling corruption and a plan to continually improve our approach over time. Our ambition is to create an organisation that is resilient to the threat of corruption, can protect its hard-working staff, prevent any who might be manipulated into corruption and target those engaging in corrupt behaviour through four strategic approaches:
 - **PROTECT** against corruption by understanding threats, having robust policies, processes and procedures in place and holding ourselves to account
 - **PREVENT** staff from engaging in corruption by recruiting a resilient workforce, strengthening capability and professional integrity and managing corruption risks
 - **PURSUE** and punish those involved in corruption through disciplinary and criminal justice outcomes
 - **PREPARE** for the consequences of corrupt behaviour and support teams where corruption has occurred
- 1.3. HMPPS oversees a proud and professional prison and probation service. We drive a culture of professional standards and are committed to addressing wrongdoing sensitively and fairly, and at the earliest stage, preventing it escalating into corruption. Where corruption does take place however, HMPPS will provide a robust response. This Policy Framework sets out a range of activities that will help prevent corruption before it takes place and outlines a clear process for pursuing corrupt staff to appropriate HR and criminal justice outcomes.
- 1.4. Staff at all grades, and in all roles, have a responsibility to protect the resilience of this service against wrongdoing and corruption. While this Policy Framework sets out the important minimum mandatory actions for staff, it is vital that staff behave professionally in everything they do. In particular, staff must consciously maintain professional boundaries as they develop supportive and rehabilitative relationships with offenders, and speak confidently to line managers or local counter corruption staff if they are concerned they have overstepped the line.
- 1.5. The Counter Corruption Unit (CCU) also plays a key role in supporting staff, managers and leaders to tackle corruption throughout the organisation. It is responsible for HMPPS' counter corruption policy and procedures, leading counter corruption capability raising, and most fundamentally, supporting the organisation to pursue corruption where it takes place. This document also sets out the mandatory actions for the CCU at regional and national level.
- 1.6. This Policy Framework clarifies:
 - the definition of corruption and how it can manifest in prison and probation services;
 - the mandatory processes and procedures to tackle corruption;
 - the remit and responsibilities of staff and teams with dedicated counter corruption roles;

- the relationship between counter corruption processes and relevant HR procedures and contract management; and
- the relationship between counter corruption processes, procedures and other policies and requirements (e.g. safeguarding, Intelligence Collection, Management and Dissemination, Data Protection, Anti-Fraud Policy).

1.7. As a result of this Policy Framework, staff should understand how they support the delivery of HMPPS' protect, prevent, pursue and prepare objectives. Staff should understand:

- the importance of behaving professionally and ethically in everything we do;
- what corruption is, how it can happen, how to prevent it taking place;
- what to do if they suspect wrongdoing and corruption, including what and how to self-disclose and / or report other concerns;
- the roles of local counter corruption staff, the CCU and its regional teams to tackle corruption;
- the new process for investigating corrupt activity including case management and prioritisation and how to effectively work in partnership with law enforcement agencies; and,
- what steps must be taken to help manage known corruptors.

1.8. This Policy Framework is supported by the Counter Corruption Handbook and a Memorandum of Understanding (MoU) between HMPPS and the National Police Chiefs' Council regarding corruption in prisons and probation, which are available to staff counter corruption roles only. The Handbook provides guidance and best practice and its use is encouraged, although not mandated. The MoU outlines the agreed ways of working with the police on corruption matters. This Policy Framework, the Counter Corruption Handbook and the MoU will be regularly reviewed and updated to inform operational responses, training and communications relating to counter corruption activity in prison and probation services.

1.9. It is likely that staff involved in investigating suspected corruption may need to work with intelligence, and therefore must adhere to the Intelligence Collection, Analysis and Dissemination Policy Framework.

2. Evidence

Definitions and examples of staff groups in prison and probation services

- 2.1. 'Staff' are defined in this Policy Framework as any individual employed, contracted or who volunteers to provide services within prisons, probation and related services. These services include, but are not limited to, public prisons, privately contracted prisons, the National Probation Service, community rehabilitation companies (CRCs), the youth estate, secure training centres, immigration removal centres (IRCs) and prisoner escort services (PECS) – hereafter referred to as prison and probation services.
- 2.2. Mandatory actions for 'all staff' are applicable to the following groups:
- Staff directly employed by HMPPS.
 - Staff employed in contracted prison, probation and related services. hereafter referred to as 'staff of contracted service providers'.
 - People who are not directly employed by HMPPS but provide core or auxiliary prison and probation services, including (but not limited to):
 - general contractors (e.g. catering, healthcare workers, education, employment, maintenance);
 - consultants;
 - agency staff;
 - sessional workers;
 - volunteers and charity workers²; and,
 - locum staff.hereafter referred to as 'non-directly employed persons'.
- 2.3. Where mandatory actions in this Policy Framework are only applicable to HMPPS staff, this will be clearly stated.

Definition of wrongdoing in prisons and probation services

- 2.4. HMPPS defines wrongdoing as any behaviour that fall short of the professional standards expected of staff. Wrongdoing is a broad category and can be intentional or unintentional. It can encompass staff behaviours such as inadvertently overstepping professional boundaries with offenders, bullying and harassment, and inappropriate use of force as well as corruption. The regional CCU team can provide advice to local counter corruption teams where there is uncertainty over whether something falls within the definition of corruption.
- 2.5. HMPPS recognises that it is important to address wrongdoing at the earliest opportunity. This this is essential to drive a culture of professional standards which is more effective at delivering prisons and probation services and is more resilient to corruption. It is also important to address a specific incident or pattern of wrongdoing to protect and prevent staff from being blackmailed by corruptors, who may threaten to report staff unless they comply with their criminal demands. Staff who have fallen short of professional standards will be

² It is recommended that contracted service providers make sure that charities and volunteers are compliant with the requirements of the Policy Framework as best practice but this is not mandated.

treated sensitively and fairly, and are encouraged to disclose their behaviour at the earliest opportunity before the situation escalates.

- 2.6. This Policy Framework sets out the process for reporting wrongdoing concerns, however investigations and outcomes for wrongdoing (that are not corruption) must be managed under the PSI 06/2010 Conduct and Discipline and PI 34/2014 NPS Conduct and Discipline policies or the relevant HR policies and procedures of contracted service providers. For HMPPS staff, wrongdoing may amount to misconduct or gross misconduct depending on the circumstances of the case. By comparison, HMPPS staff should be aware that corruption will always amount to gross misconduct (see below).

Definition of corruption in prison and probation services

- 2.7. HMPPS defines corruption as **a person in a position of authority or trust who abuses their position for benefit or gain for themselves or for another person**. In prison and probation services, this would include the misuse of a person's role to plan or commit a criminal act, or a deliberate failure to act to prevent criminal behaviour.
- 2.8. 'Abusing their position' may include acting or failing to act (e.g. turning a blind eye) in a way that constitutes a breach of the duties of that office. 'Benefit' or 'gain' can include financial, emotional, sexual or other personal and / or work-related reasons. Staff may be motivated by malicious or "noble causes" (i.e. where individuals break the rules "for the right reasons").
- 2.9. A non-exhaustive list of examples of criminal activities and / or inappropriate behaviours that fall within this definition of corruption is set out below:
- conveying prohibited or restricted items into or out of a prison;
 - aiding a prisoner to escape;
 - inappropriately facilitating offender movement or reclassification;
 - forming inappropriate relationships with offenders or with non-offenders (e.g. friends or family members of offenders, criminal groups);
 - sexually assaulting a prisoner or offender;
 - disclosing personal, sensitive or restricted information or data to an offender, member of staff or the public, without authorisation³;
 - inappropriately influencing or blackmailing staff, including to engage in criminal activity;
 - accepting or seeking bribes or favours, including for commercial purposes including fraud;
 - failure to discharge duties or follow procedures to the required standard (e.g. consistent failure to perform a search or consistently performing a search poorly, intentionally failing to acknowledge the discovery of contraband during a search, a change in the standard to which duties are performed in specific contexts); and,
 - theft of HMPPS money or property, or offender's money or property.
- 2.10. The definition of corruption is intended to include conduct which might result in a prosecution under a range of offences including Misconduct in Public Office (e.g. inappropriate relationships), the Bribery Act 2010 and offences under the Prison Act 1952 (e.g. trafficking of prohibited items). In the most serious cases, convicted individuals may receive up to a 10-

³ It is recognised that disclosures for 'whistleblowing' purposes are likely to be unauthorised. Staff should refer to the Ministry of Justice "Whistleblowing and raising a concern" [policy](#) and [procedure](#) to be clear if a disclosure is protected by the Public Interest Disclosure Act 1998 and the whistleblowing policy.

year custodial sentence. For HMPPS staff, corruption is considered gross misconduct under PSI 06/2010/PI 34/2014 Conduct and Discipline policies. Gross misconduct can result in dismissal from the service. It is likely that dismissed staff will not be permitted to work in the service again. This may also affect their ability to work elsewhere in the public sector in the future as it may affect their security vetting.

- 2.11. Staff of contracted service providers are not directly employed by a public body; however, they are considered to be discharging the duty of a public officer when working in prison and probation services. As such, they may be charged with committing a common law offence of Misconduct in Public Office.
- 2.12. HMPPS' definition of corruption does not include criminal offences that are not motivated by gain (e.g. assault). Staff should refer to procedures for reporting crime in prisons to report these incidents or behaviours. The corruption definition does not include matters that are purely wrongdoing, misconduct and management issues which fall short of the corruption definition (e.g. abuse of sick leave, misuse of IT equipment, grievances, complaints) (see above).
- 2.13. Corruption and wrongdoing, as defined in this Policy Framework, will not be tolerated no matter what the form or the motivation.

Definition of known and suspected corruptors

- 2.14. HMPPS defines a known corruptor as an individual (usually a prisoner or offender) who has received an adjudication or criminal justice outcome related to corrupting staff.
- 2.15. HMPPS defines a suspected corruptor as an individual (usually a prisoner or offender) who has not received an adjudication or criminal justice outcome related to corrupting staff, but is suspected of corrupting staff.
- 2.16. Prisons and probation have different powers to manage known corruptors compared to managing suspected corruptors. It is important to pursue suspected corruptors and secure outcomes where appropriate so they may be more robustly managed.

3. Outcomes

The outcomes from the implementation of this Policy Framework are that:

- 3.1. Everyone understands and are familiar with definitions of corruption and wrongdoing, including their obligations to report suspicions or incidents of corruption and wrongdoing.
- 3.2. Everyone follows the appropriate policies and procedures for dealing with wrongdoing, misconduct, management issues and corruption, depending on the circumstances of each case.
- 3.3. HMPPS staff are aware of the expected professional standards of conduct, as outlined in PSI 06/2010 Conduct and Discipline and PI 34/2014 NPS Conduct and Discipline policies, and, separately, in the Civil Service Code, and the need to comply with these standards of conduct at all time.
- 3.4. Staff of contracted service providers and non-directly employed persons are aware of the expectation for them to comply with HMPPS' expected professional standards of conduct and the professional standards of conduct of their employer.

- 3.5. Everyone understands the risks around corruption and can act to robustly manage that risk within their remit.
- 3.6. Everyone is aware of the roles and responsibilities of counter corruption staff in HMPPS and understand when and how to access their support.
- 3.7. Intelligence is handled in line with the Intelligence Collection, Management and Dissemination Policy Framework.
- 3.8. Use of privileged, personal and confidential information for corruption related investigation is requested only when proportionate and is handled in line with current data protection legislation.
- 3.9. Counter corruption staff are appointed to handle corruption cases and suspicions of corruption are escalated appropriately according to the severity of the case.
- 3.10. Counter corruption staff at local, regional and national levels can work effectively in partnership with police and other agencies to progress investigations of corruption cases in custody and the community. The CCU must ensure that a suitable memorandum of understanding with the police is in place which is compliant with the Data Protection Act 2018.
- 3.11. Everyone is aware of the consequences of engaging in corrupt behaviour, including potential HR and criminal justice outcomes.

4. Requirements

Counter corruption resources – staffing roles and responsibilities

- 4.1. Staff must be appointed locally, whether in prison, probation or prisoner escort services to lead on counter corruption activity as per paragraphs 4.3 to 4.10 of this Policy Framework.
- 4.2. Local resources will be supported at a regional level by one of the CCU's Regional Teams and by the national CCU. The regional teams will consist of, at least:
 - 1 x Band 8 Regional Corruption Pursue Lead (RCPL)
 - 1 x Band 5 Regional Corruption Pursue Manager (RCPM)
 - 1 x Band 3 Regional Corruption Pursue Officer (RCPO)
 - 1 x Band 5 Regional Counter Corruption Analyst (RCCA) (who will sit as part of the Regional Intelligence Unit (RIU)).

The CCU also has a Long Term and High Security Estate team, led by an RCPL, which works with all regional teams. See Annex A for a breakdown of the roles and responsibilities of local, regional and national staff resources. See Annex D for glossary.

Prison

- 4.3. Governors and Directors must appoint a Local Counter Corruption Manager (LCCM) and a Deputy Local Counter Corruption Manager (D-LCCM) to act as a point of contact and lead for corruption related matters.
- 4.4. The LCCM role must be at Deputy Governor grade in prisons outside of the Long Term and High Security Estate (LTHSE). In High Security prisons, a dedicated Band 7 will carry out this role. In the Long-Term prisons in the LTHSE, the LCCM will be the Head of Security.

- 4.5. The D-LCCM must be Band 5 or above. The LCCM may delegate duties, as appropriate, to the appointed D-LCCM as and when required, but maintains responsibility for compliance and delivery of this framework. Where this Policy Framework refers to the LCCM's duties, this may be read as the D-LCCM's duties where they have been delegated
- 4.6. Governors must have an intelligence analyst identified and assigned to support local counter corruption work.
- 4.7. Governors and Directors must ensure that LCCMs, D-LCCMs and Local Analysts are given sufficient time and resource to carry out this role effectively and must reflect this work on Staff Performance and Development Records (SPDR).

Probation

- 4.8. In the NPS, Probation Divisional Directors must appoint a Divisional Counter Corruption Manager (DCCM). The DCCM must be at senior officer grade, with experience of staff investigations. Divisional Directors must ensure that DCCMs are given sufficient time and resource to carry out this role effectively and must reflect this work on Staff Performance and Development Records (SPDR).
- 4.9. In CRCs, each CRC Chief Executive must appoint a CRC Counter Corruption Manager (CRC-CCM) who will act as a single point of contact for all corruption related matters.

Prisoner escort and custody services

- 4.10. The head of prisoner escorting and custody service (PECS) providers must appoint the PECS Security Manager to act as a PECS Counter Corruption Manager (PECS-CCM) who will act as a single point of contact for all corruption related matters. Head of PECS must ensure that PECS-CCMs are given sufficient time and resource to carry out this role effectively.

Protecting staff from corruption - staff capability

HMPPS directly employed staff

- 4.11. The Head of HMPPS Learning and Development must ensure that all staff complete corruption awareness and prevention training as part of new officer training. This must cover equalities issues and aim to reduce any stereotyping or bias in the reporting or investigation of staff and offenders from specific protected characteristic groups in relation to corruption.
- 4.12. Governors (in prisons) and Heads of Local Delivery Units (LDUs) (in NPS) must provide staff with continuing professional development and refresher training on corruption detection and prevention throughout their employment. The format and frequency of this should be determined at a local level, informed by any guidance issued by the CCU.
- 4.13. The CCU must develop a national capability strategy on counter corruption and support local delivery of this strategy. The CCU must provide prisons and probation with sufficient information on known corruption risks and threats.
- 4.14. LCCMs / D-LCCMs, DCCMs, RCPLs and RCPMs must complete mandatory training once appointed. This includes relevant training on corruption (e.g. LCCM course), Regulation of Investigatory Powers Act 2000, and intelligence collection, analysis or intelligence management.

- 4.15. It is recommended that training is completed prior to any involvement in the investigation of corruption cases and that LCCMs / D-LCCMs and DCCMs have an introductory meeting with their RCPL. Where this is not practical, all mandatory training must be completed within 6 months of taking up the post of LCCM / D-LCCM, RCPL, RCPM and DCCM unless there are extenuating circumstances to prevent this (e.g. availability of training). LCCM / D-LCCM, RCPL, RCPM and DCCM should inform the Governor, Prison Group Director or Probation Divisional Director if they are operating prior to the completion of mandatory training courses.

Staff of contracted service providers and non-directly employed persons

- 4.16. In contracted prisons, LCCMs and D-LCCMs must complete mandatory training once appointed. This includes relevant training on corruption (e.g. LCCM course), Regulation of Investigatory Powers Act 2000, and intelligence collection, analysis or intelligence management.
- 4.17. Contracted service providers must have procedures in place to prevent corruption and wrongdoing amongst staff as required by the Bribery Act 2010 and any other contractual requirements. Contracted service providers must ensure that these procedures include training on corruption awareness, detection and prevention as part of a staff induction and ongoing refresher training. It is the responsibility of each contracted service provider to deliver training and refresher training. Support and guidance on how this training should be delivered will be available from the CCU and HMPPS Learning and Development.
- 4.18. Non-directly employed persons must refer to their employer for corruption related training but may also seek advice from LCCMs (when working in prisons) or DCCMs (when working in probation) on how to detect and report suspicions of corruption and wrongdoing.
- 4.19. The CCU and its regional teams must support contracted service providers and non-directly employed persons to build capability at all levels for the detection and prevention of corruption. This includes providing contracted service providers with sufficient information on known corruption risks and threats.

Prevention of corruption

Vetting

- 4.20. Vetting is the first line of defence against corruption and must be undertaken prior to appointment. Vetting reduces the risk that staff members who are intentionally targeting prison and probation services, or who may be a risk to the organisation, are able to take up employment and access offenders in our care.
- 4.21. The Approvals and Compliance team (based in MoJ shared services), the Vetting Contact Point and Vetting Outcome Decision Maker for each business unit must ensure that pre-employment vetting processes are completed for all staff, to the correct level, before appointment and that vetting is reviewed as required throughout employment as per PSI 07/2014 and PI 03/2014 - Security Vetting.
- 4.22. Governors maintain ultimate authority on who may enter their prison and what level of access is authorised. Local Delivery Unit Heads maintain ultimate authority on who may enter their approved premises and what level of access is authorised. They should satisfy themselves that all relevant security checks have been completed and complete a risk assessment for non-directly employed persons where a specific level of vetting has not been mandated in PSI 07/2014 – Security Vetting.

Conflicts of interest and vulnerability declarations

- 4.23. HMPPS staff and non-directly employed persons must declare private interests that interfere or could interfere with the proper discharge of their duties. This is a requirement under this Policy Framework, PI 37/2014 – Outside Interests, PSO 1310 -Anti-Fraud Strategy and the Ministry of Justice Counter Fraud, Bribery and Corruption Policy (December 2017).
- 4.24. HMPPS staff and non-directly employed persons must bring any potential or actual conflict of interest to the attention of the LCCM (prisons) or DCCM (probation) and report any changes to their circumstances during their employment at the earliest opportunity. Governors and Heads of LDUs should maintain a register of conflicts of interest for their staff and review this at appropriate intervals.
- 4.25. Conflicts of interests and vulnerabilities that staff must report include: business interests (including secondary employment), serious financial difficulties, criminal convictions / police cautions, any personal or domestic relationships which could compromise or be perceived to compromise them in the discharge of their duties (e.g. they know or have known an offender outside of work through friends, family or previous employment), and any other domestic or personal difficulties that could impact on the working environment.
- 4.26. Governors and Heads of Local Delivery Units must ensure action is taken in each establishment and region to manage and mitigate any risk arising from a staff member's reported conflict of interest or vulnerability. Guidance on risk management can be found on the Conflict of Interest Form and in the Counter Corruption Handbook.
- 4.27. Line managers must make sure that any member of staff who discloses conflict of interest or vulnerability is signposted to relevant and appropriate support mechanisms and should be made aware that HMPPS staff can speak confidentially to the Employee Assistance Programme (EAP) via PAM Assist (free phone 0800 019 8988, Username: HMPPS, Password: HMPPS1) for counselling, support and guidance 24 hours a day, 365 days a year or visit their website (access via Firefox on the Quantum Network). Further information can also be found on MyServices. Staff of contracted service providers and non-directly employed persons should refer to their employer to identify relevant support services.
- 4.28. Contracted service providers of prison and probation services must monitor and manage potential conflicts of interest of their staff and take appropriate action to manage and mitigate any risk.

Physical security: prisons

- 4.29. Governors must ensure that arrangements for searching staff and non-directly employed persons are set out in local searching strategies – as prescribed in PSI 07/2016 – Searching of the Person.
- 4.30. Governors and security managers should consider the frequency, timing, and balance between routine, random and intelligence led searching of staff as part of the local searching strategy.
- 4.31. All staff must carry out the relevant duties in PSI 07/2016 – Searching of the Person, and PSI 09/2016 – Cell, Area and Vehicle Searching to prevent illegal items entering a prison and to detect those that have already entered the estate. Failure to complete these checks when instructed, or failure to complete them to the required standard, can constitute corrupt behaviour where there is related information or intelligence to suggest this failure is deliberate. This behaviour may be dealt with through this policy or the PSI 06/2010 – PI 34/2014 – Conduct and Discipline.

Professional standards: HMPPS directly employed staff

- 4.32. HMPPS staff are subject to the requirements in the Prison Act 1952, the Prison Rules 1999, Young Offender Institution Rules 2000 (YOI staff), Secure Training Centre Rules 1998 (STC staff), the Civil Service Code and HMPPS' Statement of Professional Standards as well as their employment contracts and associated policies.
- 4.33. The Civil Service Code sets the standards of behaviour that all civil servants are expected to follow in the discharge of their duties. The Code requires that civil servants carry out their duties with integrity, honesty, objectivity and impartiality.
- 4.34. PSI 06/2010 and PI 34/2014 – Conduct & Discipline policies outline HMPPS' Professional Standards and identify the high standards of professional and personal conduct that staff are expected to meet. Engaging in corrupt behaviour is in direct contravention to both the Civil Service Code and HMPPS' Professional Standards.
- 4.35. Failure to adhere to the Civil Service Code and HMPPS' Statement of Professional Standards may result in disciplinary proceedings and should be handled in line with PSI 06/2010 / AI 05/2010 / PI 34/2014 – Conduct & Discipline policies. In the most serious cases, a referral may be made to the police for a criminal investigation as per the Crime in Prison Referral Agreement between HMPPS, the National Police Chiefs' Council and the Crown Prosecution Service.
- 4.36. If evidence or suspicion of conduct that falls within the definition of corruption (see Section 2), is identified as part of disciplinary proceedings, this must be referred to the CCU and handled in line with this Policy Framework.

Professional standards: staff of contracted service providers and non-directly employed persons

- 4.37. HMPPS expects that staff of contracted service providers and non-directly employed persons meet the standards of behaviour expected of its directly employed staff. It is the responsibility of providers of contracted services to ensure that appropriate professional standards are established for its employees and that these are underpinned by robust HR processes to address any failures to meet these professional standards.
- 4.38. If evidence or suspicion of conduct that falls within the definition of corruption (see Section 2), is identified as part of the disciplinary proceedings of contracted service providers, this must be referred to the CCU and handled in line with this Policy Framework.

Supporting staff

- 4.39. Staff may be particularly vulnerable to corruption due to a range of factors including personal circumstances and intimidation and threats from corruptors. HMPPS has support available should vulnerable members staff. Governors must ensure prisons have a Care Team, as outlined in PSI 02/2018 - Post Incident Care. These teams can provide practical and emotional support to staff, and signpost to relevant support services following a serious incident.
- 4.40. HMPPS can offer practical support should any member of its staff be vulnerable. These include, but are not limited to, moving the offender to another prison, changing the staff members duties, or carrying out a public interest transfer if there is a significant threat to the

safety of the member of staff and / or their family. Further information can be found in PSI 24/2015 / PI 25/2010 – Permanent Transfers.

- 4.41. Staff of contracted service providers and non-directly employed persons should refer to their employer for details about the range of support services available to them.

Pursuing suspicions of corruption

- 4.42. This Policy Framework introduces a revised process for investigating and pursuing outcomes following suspicions of corruption. A flowchart of the updated pursue process can be found at Annex B.
- 4.43. The CCU must review this Policy Framework as required and on a minimum annual basis. This review must consider whether the Policy Framework has a disproportionate impact on any protected characteristic group and whether there is evidence of any bias in the decision making taking place. Where any discrepancies or bias is identified, this must be accounted for, or the policy revised to provide safeguards or mitigations.

Reporting suspicions of wrongdoing and corruption – HMPPS and non-directly employed persons

- 4.44. All HMPPS staff and non-directly employed persons must report suspicions of wrongdoing and corruption at the earliest opportunity through the appropriate channels. Failure to report corruption or serious wrongdoing may itself be a disciplinary matter (for HMPPS staff) and, in some circumstances, may constitute a criminal offence. It is important for staff to report wrongdoing before it potentially escalates into corruption.
- 4.45. The CCU, LCCMs and DCCMs must make sure that all staff (including staff of contracted service providers and non-directly employed persons) have access to and are aware of the available reporting methods so that suspicions of wrongdoing and corruption can be captured in a timely manner.
- 4.46. Reporting methods are outlined at Annex C, and include Mercury, the independently-administered Integrity Hotline and relevant local counter corruption staff (i.e. LCCM, D-LCCM, DCCM, CRC-CCM or PECS-CCM) or the CCU. In HMPPS and contracted prisons, the primary method of reporting is through Mercury's corruption reporting function. In the NPS and HMPPS HQ, the primary method is through the Integrity Hotline. For CRC's, staff should report via provider routes.
- 4.47. To support the fullest investigation of a report, HMPPS strongly encourages staff to use reporting channels which capture the identity of the reporter (e.g. Mercury, staff email). Staff are also strongly encouraged to disclose their identity when reporting through other channels (e.g. Integrity Hotline).
- 4.48. All staff engaged in counter corruption work must ensure that handling of counter corruption intelligence reports adheres to the Intelligence Collection, Analysis and Dissemination Policy Framework.
- 4.49. A reporting staff member's identity will only be accessible by counter corruption staff unless it is necessary for the staff member to provide evidence to support disciplinary proceedings (for HMPPS staff) and / or a criminal investigation. In these circumstances, wherever possible, the identity of the witness will be protected. Where this is not possible the LCCM or DCCM must discuss the situation with the reporting member of staff and put arrangements in place to

manage the disclosure. LCCMs or DCCMs must conduct a risk assessment before any disclosure takes place and ensure any necessary support mechanisms are in place.

- 4.50. All HMPPS line managers and senior leaders must ensure that members of staff who reports concerns receive adequate protection from any form of discrimination or victimisation resulting from an allegation. Any suspicions of bullying and harassment should be dealt with by line management through PSI 06/2010 Conduct and Discipline and PI 34/2014 NPS Conduct and Discipline policies.
- 4.51. HMPPS recognises that staff may wish to maintain anonymity when reporting. In these situations, staff must report via the Integrity Hotline and withhold their identity.
- 4.52. All HMPPS staff and non-directly employed persons have a duty to ensure that reporting channels are not used maliciously or as a vehicle for bullying and harassment. Any suspicions of bullying and harassment, false or malicious reporting will be dealt with through line management chains under the PSI 06/2010 Conduct and Discipline and PI 34/2014 NPS Conduct and Discipline policies for HMPPS staff.
- 4.53. Any member of staff (HMPPS and non-directly employed persons) who suspect wrongdoing or corruption which involves fraud and / or theft must report the fraud and / or theft allegation to the Head of Internal Audit and Assurance Unit in line with PSO 1310 – Anti-Fraud Strategy. Reports can be made to a line manager or to the Fraud Hotline on 0207 217 8804. Any cases of suspected fraud and theft that are reported to the CCU will be passed to the Fraud Investigation Team for investigation.

Reporting suspicions of wrongdoing and corruption – offenders and visitors

- 4.54. LCCMs and DCCMs must ensure offenders and visitors have access to and are aware of a range of reporting methods so that suspicions of wrongdoing and corruption can be captured in a timely manner.
- 4.55. The primary reporting method is through the Integrity Hotline. Alternative reporting routes are outlined at Annex C, and include reporting to the relevant local counter corruption staff (i.e. LCCM, D-LCCM, DCCM, CRC-CCM or PECS-CCM) or the CCU.
- 4.56. Any member of staff (HMPPS and non-directly employed persons) to whom an offender, visitor or member of the community discloses concerns of corruption and wrongdoing must report these concerns at the earliest available opportunity as per the routes outlined above.
- 4.57. All staff engaged in counter corruption work must ensure that handling of counter corruption intelligence reports adheres to the Intelligence Collection, Analysis and Dissemination Policy Framework.
- 4.58. To support the fullest investigation of a report, HMPPS strongly encourages offenders and visitors to disclose their identity when reporting. The individual's identity will only be accessible by counter corruption staff unless it is necessary for the individual to provide evidence to support disciplinary proceedings (for HMPPS staff) and / or a criminal investigation. In these circumstances, wherever possible, the identity of the witness will be protected. Where this is not possible the LCCM or DCCM must discuss the situation with the individual and put arrangements in place to manage the disclosure.

Reporting suspicions of corruption - contracted service providers

- 4.59. Contracted service providers must establish their own internal corruption reporting structures. Contracted service providers must ensure that relevant corruption related information and intelligence is shared locally and regionally with HMPPS in line with existing guidance – see Counter Corruption Handbook. Where there is no access to Mercury, information and intelligence must be shared through secure communication methods e.g. secure email.
- 4.60. Contracted service providers must ensure that offenders, visitors and staff have access to and are aware of a range of reporting methods so that suspicions of wrongdoing and corruption can be captured in a timely manner. Staff of contracted service providers should refer to their employer's resources for information on how to report suspicions of corruption. Additionally, they can report concerns through any of the mechanisms outlined in Annex C that are accessible to them.
- 4.61. Contracted prisons must ensure that corruption related intelligence is handled in line with the Intelligence Collection, Management and Dissemination Policy Framework. Use of privileged, personal and confidential information for corruption related investigation is requested only when proportionate and handled in line with current data protection legislation.
- 4.62. Other contracted service providers (e.g. CRCs and escort service providers) must make sure that the processing, storage and destruction of corruption related intelligence is compliant with all current data protection legislation. Use of privileged, personal and confidential information for corruption related investigation is requested only when proportionate and handled in line with current data protection legislation.

Reporting suspicions of corruption - safeguarding responsibilities

- 4.63. In some circumstances, corruption and wrongdoing can raise safeguarding issues. All HMPPS staff, staff of contracted providers and non-directly employed persons working or volunteering with young people (under the age of 18), must be clear of their safeguarding responsibilities.
- 4.64. All HMPPS staff, staff of contracted service providers and non-directly employed persons must report suspicions of wrongdoing and corruption at the earliest opportunity through the appropriate channels. If the suspected wrongdoing or corruption involves any actual or potential harm to a young person, this must also be reported using child protection procedures as outlined in PSI 08/2012 - Care and Management of Young People for HMPPS staff or through the policies and procedures of other employers for staff of contracted service providers and non-directly employed persons. Under 18 sites will also have their own "whistleblowing policy" as required by the Working Together Guidance (July 2018).
- 4.65. All HMPPS staff, staff of contracted providers and non-directly employed persons working or volunteering must be clear of their safeguarding responsibilities for adults and follow the appropriate reporting procedures as outlined in PSI 16/2015 – Adult Safeguarding in Prison. This is particularly important where an offender may have mental health, physical health or social care issues which may make them particularly vulnerable.
- 4.66. All HMPPS staff, staff of contracted providers and non-directly employed persons working or volunteering in the female estate should be familiar with the Women's Policy Framework which outlines the actions to be taken to ensure that women are managed effectively whilst in custody. The supporting Guidance 'Working with women in custody and the community' provides more detailed advice and guidance for staff to identify and address the needs of those women who may be particularly at risk of abuse or neglect. This includes pregnant

women, women who have experienced domestic violence and women who have been involved in sex work.

Handling and processing corruption intelligence reports

- 4.67. All staff with access to corruption related intelligence must ensure it is handled, stored and considered for destruction in line with the Intelligence Collection, Management and Dissemination Policy Framework. Use of privileged, personal and confidential information for corruption investigations must be used in compliance with current data protection legislation. Access to intelligence and information will be restricted only to those individuals who require it in order to investigate and combat the threat posed by corruption.
- 4.68. The LCCM and the CCU (including on behalf of the DCCM) must ensure that reports received through channels other than Mercury are appropriately entered onto the Mercury server.
- 4.69. The local analyst (under the authority of the LCCM) and the CCU must ensure intelligence reports relating to corruption are triaged within 72 hours. If the intelligence relates to a major and / or imminent risk (e.g. potential abscond, escape or threat to life) this should be immediately escalated through the appropriate channels.
- 4.70. When triaging intelligence reports relating to corruption, the local analyst (with support of the LCCM), and the CCU (including on behalf of the DCCM), must consider whether the report relates to potential corruption, professional standards (not including potential corruption) or requires no further action. Information and intelligence that concerns professional standards matters (not including potential corruption) must be referred to the appropriate point in the line management chain to be handled under the PSI 06/2010 – PI 34/2014 – Conduct and Discipline policies.
- 4.71. For intelligence that relates to potential corruption, the local analyst, with support of the LCCM (in prisons), and the CCU (including on behalf of the DCCM), must ensure that corruption reports on Mercury are processed in compliance with the Intelligence Operations Manual.
- 4.72. The local analyst (under the authority of the LCCM) and the CCU must sanitise and disseminate intelligence in line with the MoU with police. This must be done in accordance with the Intelligence Collection, Management and Dissemination Policy Framework. The CCU will be responsible for sharing regional and national level intelligence via the RCCA and National Corruption Analyst (NCA).
- 4.73. The Prison Intelligence Officer (PIO) and / or the Regional Prison Intelligence Unit (RPIU) are the police points of contact for the receipt of sanitised corruption related intelligence with appropriate handling codes as per the Intelligence Collection, Management and Dissemination Policy Framework. Prisons may also request relevant information from the PIO, as per the MoU with the police.
- 4.74. The Youth Estate must follow the above process for prisons unless a Local Authority Designated Officer (LADO) is involved and a substantiated issue has been identified.

Case management

- 4.75. For those cases identified during the triage process as potential corruption, the LCCM and DCCM must consider the assessed intelligence and available information and make an assessment as to the banding of the case based on the likelihood of the corruption risk materialising and the actual or potential impact should the risk materialise (as outlined in the Counter Corruption Handbook). The banding of a case denotes the level of priority (and

therefore resourcing) associated with a case. The LCCM and DCCM should make this assessment in consultation with relevant partners, in most cases, at a case management meeting.

- 4.76. The LCCM and DCCM must hold monthly (or as frequently as required) case management meetings to support the management of their corruption cases. Case management meetings should include all local counter corruption staff, the PIO (in prisons) or other police representatives, and in some circumstances contracted service providers. Case management meetings should only include individuals who are required to investigate and combat the threat posed by corruption.
- 4.77. Regional CCU teams will be represented at local case management meetings. Should resourcing impact on the CCU's ability to attend case management meetings, priority must be given to meetings that will be discussing Band 1 and 2 cases. Regional CCU teams must engage with the relevant prison / probation team after case management meetings (e.g. to obtain minutes etc.).
- 4.78. The case management meetings must consider the local corruption caseload and threats. For each case, it should consider the assessed intelligence and available information, the banding of the case, the potential outcome of a case, and the desired support from regional teams and law enforcement. The LCCM / DCCM must ensure that any decision to share information and/or intelligence does not compromise an ongoing investigation. Where intelligence is shared on the authority of the LCCM or CCU, this must adhere to the Intelligence, Collection, Management and Dissemination Policy Framework. In consideration of case bandings and the resources available, the LCCM / DCCM may request and task further analytical development, tactical activity, support from the CCU and law enforcement agencies. All decisions and actions should be logged.
- 4.79. The case management meeting does not prevent counter corruption staff progressing corruption cases outside of the meeting, providing that key partners are appropriately informed and action is agreed. Case management meetings run in parallel to Local, Regional and National Tactical Tasking and Coordination meetings.
- 4.80. The LCCM and DCCM must regularly appraise Governors and LDU Heads on the number of open cases, their respective bandings, the progression of such cases and the outcomes, to inform monthly case management meetings. This is for the management and deployment of resource only, and should only include details about individuals in these cases where it is appropriate and necessary. A monthly meeting is recommended.

Disciplinary and criminal justice outcomes

- 4.81. LCCMs, DCCMs and the CCU must always seek a disciplinary and / or criminal justice outcome for any corrupt member of staff where it is within their power to do so.
- 4.82. LCCMs, DCCMs and the CCU must formally resolve all investigations into a member of staff where there are allegations of corruption, even when an individual resigns while under investigation.
- 4.83. HMPPS cannot dismiss staff of contracted service providers and non-directly employed persons but Governors can exclude them from prisons under PSI 42/2014 – PI 60/2014 – Exclusion of Personnel on Grounds of Misconduct. The exclusions list records HMPPS staff, staff of contracted service providers and non-directly employed persons who are excluded from one or more prisons or business units.

- 4.84. Governors, and LDU Heads should follow PSI 42/2014 – PI 60/2014 – Exclusion of Personnel on Grounds of Misconduct where any member of staff's behaviour or action has undermined the relationship of trust with the organisation or poses a threat to the good order and security of the organisation.
- 4.85. Governors, Prison Directors, Local Delivery Unit Heads and contracted service providers must ensure that all cases where someone is dismissed, excluded, or has their contract terminated due to safety and / or security concerns are reported to recruitment-decisions@justice.gov.uk as per PSI 42/2014 – PI 60/2014 – Exclusion of Personnel on Grounds of Misconduct.
- 4.86. All staff must support the police and Crown Prosecution Service (CPS) in any criminal investigations and prosecutions that may arise following allegations of corruption. This includes providing witness statements and giving evidence in court if required. Managers must facilitate staff to give this support.

Adjudication and criminal justice outcomes for corruptors

- 4.87. LCCMs, DCCMs, CRC-CCMs and PECS-CCMs must always attempt to seek an adjudication or criminal justice outcome for anyone who corrupts staff where there is sufficient evidence to do so. Guidance can be obtained from the CCU on what behaviours could be considered for an adjudication, or police referral, in relation to attempts to corrupt staff.
- 4.88. If relevant, offenders in prison who seek to corrupt members of staff may be charged using Prison Rule 51(2) using threatening abuse or insulting words and behaviour and Prison Rule 51(23) disobeying or failing to comply with any rule or regulation applying to them.
- 4.89. If relevant, offenders in prison and in the community, may also be charged under offences in the Bribery Act 2010.
- 4.90. LCCMs (in HMPPS and contracted prisons) and DCCMs must inform the regional CCU team when they have secured an adjudication or criminal justice outcome in relation to an offender corrupting staff.
- 4.91. Regional CCU teams must set an alert on PNOMIS and / or nDELIUS once they are alerted that it has been proven that an offender has corrupted any member of staff (that is where there is an adjudication or criminal justice outcome relating to the corruption of a member of staff).
- 4.92. LCCMs, DCCMs, CRC-CCMs and PECS-CCMs must ensure that all relevant staff are briefed on known corruptors in their care (i.e. where a flag has been set on PNOMIS and / or nDELIUS when there has been an adjudication or criminal justice outcome relating to the corruption of a member of staff). Briefings on corruptors should include only information that is deemed relevant as per PSI/PI 03/2018 – The DPA 2018 and GDPR, The FOI Act 2000, EIR 2004.
- 4.93. LCCMs, DCCMs, CRC-CCMs and PECS-CCMs and contracted services must ensure that all relevant systems and paperwork (e.g. Observation Book, T Card, Prisoner File, Security Risk Assessment, nDELIUS casework notes) are kept up to date and reflect the risk posed by known 'corruptors', sharing only information that is deemed relevant as per PSI/PI 03/2018- The DPA 2018 and GDPR, The FOI Act 2000, EIR 2004. This is particularly important when an individual is transferring to a new prison, is being released into the community, is being escorted to a court hearing, or in employment where they may be in close contact with lone workers, so that any risk can be appropriately managed.

- 4.94. Where a 'corruptor' flag has been added to an offender's PNOMIS or nDELIUS records, this must be included on prisoner escort records, as is standard for other PNOMIS alerts.

Preparing a response to corruption – HMPPS and contracted service providers

Monthly reporting arrangements

- 4.95. The CCU maintains a national database of cases relating to corruption. This data is used to identify and respond to emerging threats and trends, to brief ministers and provide public responses (e.g. to Parliamentary Questions and Freedom of Information requests). LCCMs and DCCMs must complete a report monthly for submission to the CCU.

Media and press coverage

- 4.96. Corruption cases can generate media interest. HMPPS and non-directly employed persons who are contacted by the press or media must refer them directly to the Governor, Duty Governor, Local Delivery Unit Head, Media Liaison Officer or the Ministry of Justice Press Office. Staff of contracted service providers should refer to their internal press / media teams.
- 4.97. Governors, Duty Governors, LDU Heads and Media Liaison Officers must ensure that the national Counter Corruption Pursue Lead and the Ministry of Justice Press Office are alerted to and engaged before responding to any press contact to ensure consistency in messages to the public relating to corruption.

5. Constraints

- 5.1. Development of information and intelligence relating to suspected cases of corruption must not be undertaken by anyone other than local corruption analysts, LCCM, D-LCCMs, DCCMs, the CCU and its regional teams.
- 5.2. Investigations into corruption and wrongdoing are sensitive. Staff must not act in a way that may jeopardise an investigation. Staff should only discuss suspicions of corruption and wrongdoing insofar as making a report in line with this policy. HR, LCCMs, D-LCCMs, DCCMs, the CCU and its regional teams, or the police, may ask a member of staff to provide clarifications or further details as part of case development, a disciplinary investigation or a criminal investigation.
- 5.3. Discussion of suspicions of corruption or wrongdoing with anyone other than those outlined at para. 5.2. could be considered as bullying and harassment and action may be taken under PSI 06/2010 Conduct and Discipline and PI 34/2014 NPS Conduct and Discipline policies or through relevant HR policies and procedures of contracted service providers.
- 5.4. Staff must not make unauthorised statements to the press or media on a prison matter, including in relation to corruption. Unauthorised comments made by HMPPS staff to the press or media may be considered a disciplinary offence.

6. Guidance

- 6.1. For staff with counter corruption responsibilities, this Policy Framework is supported by the Counter Corruption Handbook and the MoU with the police.

| Local | | | |
|------------------------------|-----------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | Role | Grade | Duties |
| Prisons (HMPPS & Contracted) | Local Counter Corruption Manager (LCCM) | <p>Deputy Governor / Deputy Director grade in prisons outside of the Long Term and High Security Estate (LTHSE).</p> <p>In High Security Prisons a dedicated Band 7 will carry out this role.</p> <p>In Long Term prisons in the LTHSE, the LCCM will be the Head of Security.</p> | <ul style="list-style-type: none"> • Duties may be delegated to D-LCCM, as appropriate, however LCCM maintains responsibility for compliance and delivery of the Policy Framework • Core duties expected to include: <ul style="list-style-type: none"> • The case management of all corruption cases within the prison, including deciding which reports are potential corruption, the banding of a corruption cases, the plans for progressing cases and the tasking and requesting of further intelligence and tactical actions, and support from CCU and law enforcement. • Holding monthly case management meetings and ensuring decisions and actions are logged and performed. • assuring that Local Analyst actions the receipt, confidential handling, evaluation, dissemination and disclosure of corruption related information and intelligence • raising awareness of corruption issues: avoiding corruption, how to report it, conducting or contributing to regular local assessments • providing monthly reports to CCU and regional teams |

Local

| | Role | Grade | Duties |
|-----------------|--------------------------------------------|-----------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | Deputy Counter Corruption Manager (D-LCCM) | Band 5 or above | As above as delegated by the LCCM. |
| | Local Analyst | Band 4 | <ul style="list-style-type: none"> • Core duties expected to include: <ul style="list-style-type: none"> • follow the Counter Corruption and Reporting Wrongdoing and the Management of Intelligence, Data Protection Policy Frameworks • conduct initial triage of corruption related intelligence under supervision of the LCCM • support corruption case development and investigations • assist the LCCM to perform their role e.g. providing intelligence input as requested via case management meetings and tasking and co-ordination meetings |
| Probation – NPS | Divisional Counter Corruption Manager | Dependent on DDP allocation but must be Head of Unit equivalent | <ul style="list-style-type: none"> • Core duties expected to include: <ul style="list-style-type: none"> • raising awareness of corruption issues – avoiding corruption and how to report it • conducting or contributing to regular local capability assessments • overseeing the progression of corruption cases and coordination with CCU. |
| Probation – CRC | CRC - Counter Corruption Manager | Senior management grade | <ul style="list-style-type: none"> • Core duties to be defined as per CRC's procedures but expected to include: <ul style="list-style-type: none"> • regular meetings with CCU's regional teams (frequency to be determined locally in line with need) • raising awareness of corruption issues – avoiding corruption and how to report it • receipt and confidential handling of corruption |

Local

| | Role | Grade | Duties |
|----------------|-----------------------------------|------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| PECS Providers | PECS - Counter Corruption Manager | Security Manager | <ul style="list-style-type: none"> • Core duties to be defined as per PECS provider's procedures but expected to include: <ul style="list-style-type: none"> • regular meetings with Local Counter Corruption Manager in relevant prisons (frequency to be determined locally in line with need) • raising awareness of corruption issues – avoiding corruption and how to report it • receipt and confidential handling of corruption |

Regional

1 x SOCT region (LTHSE will also have 1 x RCPL)

| Role | Grade | Duties |
|----------------------------------------|--------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Regional Corruption Pursue Lead (RCPL) | Band 8 | <ul style="list-style-type: none"> • Core duties expected to include: <ul style="list-style-type: none"> • maintaining a strong and active relationship with all LCCMs in the region • assist local teams in handling and development of corruption-related cases (involvement depending on case banding) by offering expert advice • support research to inform evidence base on corruption, including interviewing former staff who have been convicted of corruption related offences – sharing best practice with local teams • monitor monthly returns from local teams and manage the data provided • attend local case management meetings and attend regional tasking meetings • line management of RCPM |

Regional

1 x SOCT region (LTHSE will also have 1 x RCPL)

| Role | Grade | Duties |
|-------------------------------------------|--------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Regional Corruption Pursue Manager (RCPM) | Band 5 | <ul style="list-style-type: none">• Core duties expected to include:<ul style="list-style-type: none">• providing expert advice and guidance to local teams to progress corruption cases and supporting the coordination of resources (e.g. searching) for some operational activities• attending case management meetings, and regional tasking meetings, if required• support research to inform evidence base on corruption, including interviewing former staff who have been convicted of corruption related offences – sharing best practice with local teams• maintaining accurate and up to date case records in line with CCU's case management system and regularly developing reports based on case management data |

Regional

1 x SOCT region (LTHSE will also have 1 x RCPL)

| Role | Grade | Duties |
|-------------------------------------------------------------------------------------------------|--------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Regional Corruption Pursue Officer (RCPO) | Band 3 | <ul style="list-style-type: none"> • Core duties expected to include: <ul style="list-style-type: none"> • supporting the RCPL and RCPM to provide a service to prisons and probation to progress corruption cases by identifying, signposting and co-ordinating other support services • co-ordinating CCU attendance / cover and regional and local tasking • facilitate effective working with law enforcement partners (police and ROCUs) – setting up meetings, following up actions, sharing appropriate contacts • identify blockages to progress in cases, acting and escalating to the RCPM and RCPL as appropriate |
| Regional Counter Corruption Analyst (RCCA) (who sits as part of the Regional Intelligence Unit) | Band 5 | <ul style="list-style-type: none"> • Core duties expected to include: <ul style="list-style-type: none"> • Support for analysts at establishment level in the management and analysis of corruption intelligence work through corruption information and intelligence reports and provide quality assurance • provide additional analytical support and expert advice to local teams on complex cases • coach local analysts on the completion of corruption elements of the Local Tactical Assessment • conduct analysis work to support management of known or suspected corruptors • research and analytical support to Band 1 and 2 corruption operations, to inform decision making and deployment of appropriate tactics • provision of sanitised corruption intelligence to the RIU, in support of regional priority nominals and networks, as agreed through the HMPPS Tasking Framework |

National – Counter Corruption Unit

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| Head of Counter Corruption Unit | Band 9 | <ul style="list-style-type: none"> • Core duties expected to include: <ul style="list-style-type: none"> • setting clear strategic objectives and priorities for the CCU, overseeing performance and financial accountability • promoting a culture of evidence-driven practice – commissioning, developing and sharing research, analysis and feedback to inform more effective working • building and maintaining strategic relationships with key delivery partners inside and outside HMPPS • attending national case management and tasking |
| National Corruption Pursue Lead | Band 8 | <ul style="list-style-type: none"> • Core duties expected to include: <ul style="list-style-type: none"> • provide expert advice and direction to regional counter corruption teams on how to progress complex cases and manage corruptors • review performance management outputs from each region to understand national counter corruption performance picture to provide overview to the Head of CCU • attend regional and national tasking (depending on need and capacity) and monitoring the national caseload • review management and performance of regional teams • progress cases in relation to HQ staff, schools and secure training colleges or where there are sensitivities that prevent a case being handled at a local and / or regional level |
| National Counter Corruption Analyst (who sits as part of the National Intelligence Unit) | Band 5 | <ul style="list-style-type: none"> • Core duties expected to include: <ul style="list-style-type: none"> • Support for analysts at establishment level in the management and analysis of corruption intelligence work through corruption information and intelligence reports and provide quality assurance • provide additional analytical support and expert advice to local teams on complex cases • conduct analysis work to support management of known or suspected corruptors • research and analytical support to Band 1 and 2 corruption operations, to inform decision making and deployment of appropriate tactics • provision of sanitised corruption intelligence to the RIU, in support of regional priority nominals and networks, as agreed through the HMPPS Tasking Framework |
| Corruption Researcher | Band 3 | <ul style="list-style-type: none"> • Core duties expected to include: <ul style="list-style-type: none"> • Supporting the NCCA to perform their duties • Receipt and triage of national reporting. |

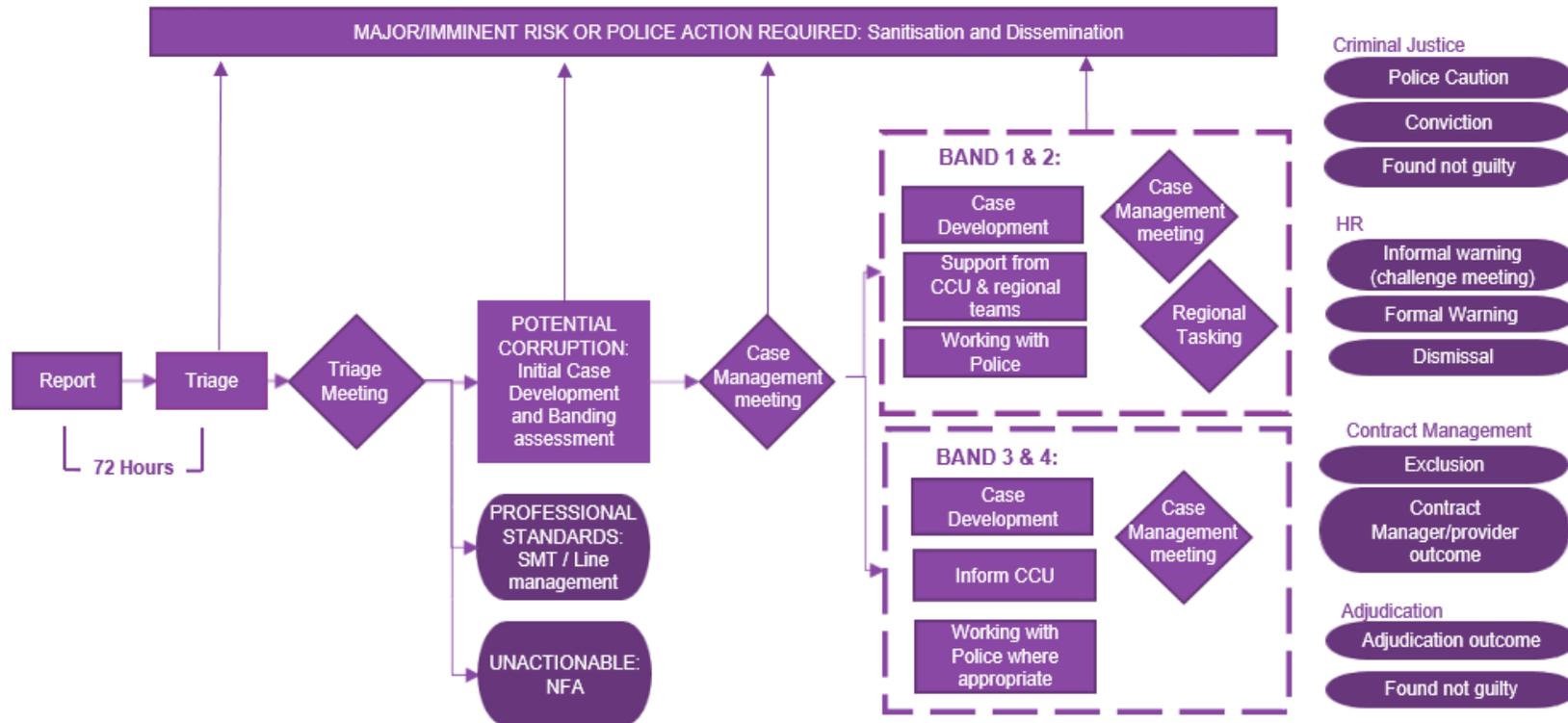
National – Counter Corruption Unit

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|----------------------------------------------------------|--------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| National Strategic Analyst | Band 5 | <ul style="list-style-type: none"> • Core duties expected to include: <ul style="list-style-type: none"> • conduct strategic analysis to improve understanding of corruption issues, risks and trends. |
| Counter Corruption Threat Manager | Band 8 | <ul style="list-style-type: none"> • Core duties expected to include: <ul style="list-style-type: none"> • maintaining, improving and introducing a range of measures across prisons and probation to address the threat from corruption • working across HMPPS and government to ensure threats are addressed in other policies that may have an impact on corruption (e.g. HR, Learning and Development, policing priorities) • reviewing and revising operational policy and ensuring guidance is aligned to operational need to tackle corruption • ensuring good practice in relation to tackling corruption is recorded and shared appropriately |
| Counter Corruption Communications and Capability Manager | Band 8 | <ul style="list-style-type: none"> • Core duties expected to include: <ul style="list-style-type: none"> • implementing, monitoring, evaluating and refreshing the new capability and communications strategies • understanding the evidence base of how corruption happens, its impacts and the most effective ways of preventing and responding to the threat • promote the expertise of the CCU and building credibility with both internal and external stakeholders at senior levels • develop and implement approaches to identify and share innovative and effective practice from across the service, contracted providers and comparable agencies |
| Counter Corruption Unit Business Manager | Band 6 | <ul style="list-style-type: none"> • Core duties expected to include: <ul style="list-style-type: none"> • supporting the Head of CCU in day to day duties, ensuring they are fully briefed on all pertinent issues and involved in decision making at the appropriate level • provide high quality, timely and efficient secretariat support • project management of activities across the unit • assessing requests in terms of priority and content, taking appropriate action and escalating only those items which require Head of CCU attention |

National – Counter Corruption Unit

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| <p>Assistant Police Adviser <i>(Part of Operational Partnerships Team)</i></p> | <p>Detective Chief Inspector (seconded)</p> | <ul style="list-style-type: none"> • Core duties expected to include: <ul style="list-style-type: none"> • acting as HMPPS Law Enforcement Advisor on corruption matters and lead on building and maintaining relationships with each of the 43 police forces with the aim of improving corruption intelligence sharing and investigation. Promoting joint efforts between law enforcement agencies and NIU to develop intelligence, using the full range of collection opportunities available to all agencies. • providing a Tactical Advisor role to corruption investigations signposting available tactical options, setting operational objectives and providing engagement at an appropriate level within the police environment • offering advice to prisons and probation teams in respect of corruption prevention strategies • liaising and supporting a network of senior investigating officers to assist prison governors to manage effective corruption investigations, ensuring proper police engagement and allocation of the appropriate level of resources • review the existing Police SPOCS with a view to ensuring that the correct members of staff with the requisite skills are deployed in the role |
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Overall pursue process



- Submit a Corruption Incident Report (CIR) on Mercury
- Calling the independently-administered 24/7 Integrity Hotline: 0800 971 6877
- Reporting to the LCCM / D-LCCM, DCCM, CRC-CCM or PECS-CCM
- Reporting to the regional team of the Counter Corruption Unit:

Counter Corruption Unit East Midlands and Eastern:
CCU-EastMidlands&Eastern@noms.gsi.gov.uk

Counter Corruption Unit London and South East:
CCU-London&SouthEast@noms.gsi.gov.uk

Counter Corruption Unit North East, Yorkshire and Humber:
CCU-NEYorkshire&Humber@noms.gsi.gov.uk

Counter Corruption Unit North West and West Midlands:
CCU-NorthWest&WestMidlands@noms.gsi.gov.uk

Counter Corruption Unit South West and Wales:
CCU-SouthWest&Wales@noms.gsi.gov.uk

- Reporting to the Counter Corruption Unit via
 - **Confidential Email:** CCU-HQ@justice.gov.uk
 - **Confidential mail box:** Counter Corruption Unit, 8th Floor Tower, 102 Petty France, London, SW1H 9AJ

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| CCU | Counter Corruption Unit |
| CRC | Community Rehabilitation Company |
| CRC-CCM | Community Rehabilitation Company - Counter Corruption Manager |
| DCCM | Divisional Counter Corruption Manager |
| D-LCCM | Deputy Local Counter Corruption Manager |
| HMPPS | Her Majesty's Prison and Probation Service |
| LADO | Local Authority Designated Officer |
| LCCM | Local Counter Corruption Manager |
| LDU | Local Delivery Unit |
| LTHSE | Long Term High Secure Estate |
| MOU | Memorandum of Understanding - An agreement between Her Majesty's Prison and Probation Service and the National Police Chiefs' Council regarding corruption in prisons and probation |
| NCA | National Corruption Analyst |
| NPS | National Probation Service |
| PECS | Prisoner Escort & Custody Services |
| PECS-CCM | Prisoner Escort & Custody Services - Counter Corruption Manager |
| PIO | Prison Intelligence Officer |
| RCCA | Regional Counter Corruption Analyst |
| RCPL | Regional Corruption Pursue Lead |
| RCPM | Regional Corruption Pursue Manager |
| RCPO | Regional Counter Corruption Pursue Officer |
| RIU | Regional Intelligence Unit |
| RPIU | Regional Prison Intelligence Unit |