



**National Security Framework** **Ref: NSF 14.0**  
**CORRUPTION PREVENTION – HOW TO IDENTIFY, REPORT AND  
MANAGE STAFF CORRUPTION IN PRISONS AND HEADQUARTERS**  
**Security Management Function**

<b>This instruction applies to :-</b>		<b>Reference :-</b>
<b>NOMS Headquarters Prisons</b>		<b>AI 04/2016 PSI 01/2016</b>
<b>Issue Date</b>	<b>Effective Date</b>	<b>Expiry Date</b>
4 March 2016 <b>(Revised)</b>	29 February 2016	N/A
<b>Issued on the authority of</b>	NOMS Management Board	
<b>For action by</b>	<p>All staff responsible for the development and publication of policy and instructions</p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> NOMS HQ</li> <li><input checked="" type="checkbox"/> Public Sector Prisons</li> <li><input checked="" type="checkbox"/> Contracted Prisons*</li> <li><input checked="" type="checkbox"/> NOMS Immigration Removal Centres (IRCs)</li> <li><input checked="" type="checkbox"/> Governors</li> <li><input checked="" type="checkbox"/> Heads of Groups</li> <li><input checked="" type="checkbox"/> Regional and Local Corruption Prevention Managers**</li> <li><input checked="" type="checkbox"/> Establishment Functional Head of Security/Operations</li> <li><input checked="" type="checkbox"/> Prisoner Escort and Custody Services (PECS)</li> </ul> <p><i>* If this box is marked, then in this document the term Governor also applies to Directors of Contracted Prisons</i>  <i>**References to the Local Corruption Prevention Manager must be read as including the Deputy Local Corruption Prevention Manager.</i></p>	
<b>Instruction type</b>	Service specification support	
<b>For information</b>	All NOMS staff who work in prison establishments or who work in NOMS HQ departments.	
<b>Provide a summary of the policy aim and the reason for its development/ revision</b>	<p><b>Update March 2016:</b> IRC staff are directly employed by NOMS and this PSI applies equally to them. To enable them to manage CP and any subsequent disciplinary processes effectively and within NOMS policy, this PSI needs to state that it applies to them also.</p> <p>This PSI replaces PSO 1215 – Professional Standards: Preventing and Handling Staff Wrongdoing.</p> <p>This PSI describes the mandatory requirements relating to the management of staff corruption for all NOMS Prison and Headquarters staff.</p>	
<b>Contact</b>	<p>Security Group:  <u>Policy related matters</u> - concerning this PSI, contact the Key Threat Manager – Corruption Prevention, <a href="mailto:sharanjit.nagra@noms.gsi.gov.uk">sharanjit.nagra@noms.gsi.gov.uk</a></p>	

	<p>0300 047 6196.</p> <p><u>Operational related matters</u>, contact the Corruption Prevention Unit, <a href="mailto:corruptionpreventionunit@noms.gsi.gov.uk">corruptionpreventionunit@noms.gsi.gov.uk</a> 01527 551229.</p> <p><b>To report staff corruption – see the ‘<a href="#">Reporting Corruption</a>’ Section within this PSI.</b></p>
<p><b>Associated documents</b></p>	<p>Memorandum of Understanding – ‘The Reporting and Investigation of NOMS Staff Corruption’ (October 2008)</p> <p><a href="#">PSI 06/2010 - AI 05/2010 – Conduct &amp; Discipline</a></p> <p><a href="#">PSI 24/2010 – AI 15/2010 – Performance Management Policy</a></p> <p><a href="#">PSI 33/2011 – AI 11/2011 – Equality of Treatment for Employees</a></p> <p><a href="#">PSI 43/2011 - Managing and reporting on extremist behaviour in custody</a></p> <p><a href="#">PSI 08/2012 - Care and Management of Young People</a></p> <p><a href="#">PSI 10/2012 - Conveyance and Possession of Prohibited Items and Other Related Offences</a></p> <p><a href="#">PSI 21/2013 - AI 08/2013 - Reporting Wrongdoing</a></p> <p><a href="#">PSI 34/2013 – AI 14/2013 – Staff Alcohol Policy</a></p> <p><a href="#">PSI 12/2014 – AI 10/2014 – PI 04/2014 - Government Secure Classification Policy</a></p> <p><a href="#">PSI 24/2014 – AI 18/2014 – PI 18/2014 – Information Assurance Policy</a></p> <p><a href="#">PSI 25/2014 – AI 19/2014 – PI 19/2014 – IT Security Policy</a></p> <p><a href="#">PSI 44/2014 – AI 28/2014 – PI 61/2014- Data Protection 1998, FOI 2000 and Environment Regulations 2004.</a></p> <p><a href="#">PSO 1310 - Anti Fraud Strategy</a></p> <p><a href="#">PSO 8410 – Flexible Working Hours</a></p> <p><a href="#">PSO 8550 – Staff Grievances</a></p> <p><a href="#">AI 03/2009 - Information Assurance</a></p> <p>NOMS Prison Drug Supply Reduction and Mobile Phone Good Practice Guides</p> <p>Related Service Specification for Security Management</p> <p><a href="#">Civil Service Code</a></p>
	<p><b>Replaces the following documents which are hereby cancelled:</b> - PSO 1215 – Professional Standards: Preventing and Handling Staff Wrongdoing.</p>
	<p><b>Audit/monitoring:</b> - Compliance with this PSI will be monitored through internal self-audit, through the operational line and may be monitored by Audit and Corporate Assurance as part of ongoing systems audit.</p>
	<p><b>Introduces amendments to the following documents:</b> - None</p>
	<p><b>Notes:</b> <i>All Mandatory Actions throughout this instruction are in italics and must be strictly adhered to.</i></p>

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## 1. Executive summary

- 1.1. The majority of staff undertake their duties with honesty and integrity. Unfortunately, like all large organisations, a minority of staff engage in corrupt activity. However, NOMS is committed to corruption prevention training and awareness work and ensuring that corruption, where suspected, is investigated and eliminated so that prisons remain a safe and secure environment for staff, prisoners and visitors and to ensure the public are protected.
- 1.2. **All staff are expected to conduct themselves in accordance with the [Civil Service Code](#) which requires all staff to act professionally, with integrity, objectively, honestly, impartially and to comply with the law. Additionally, the NOMS Professional Standards Statement which can be found in [PSI 06/2010 - AI 05/2010 – Conduct & Discipline](#) – identifies the high standards of professional and personal conduct that staff are expected to meet. Not engaging in any form of corrupt behaviour is a key element of these standards.**
- 1.3. Two versions of this PSI have been produced:
- a) An Open version - which will provide open access to all staff via the intranet. They will be able to access Sections 1 - 5 and [Annex A](#) and [Annex B](#) only of the PSI.
  - b) A Closed version - this will have restricted access and will only be available to those who will be working directly from the PSI, for example, the LCPMs/Deputy LCPMs/RCPMs/Governors/Deputy Governors. They will have full access to the PSI.
- 1.4. This is the **Open** PSI.

### Background

- 1.5. This Prison Service Instruction (PSI) describes the mandatory requirements relating to the management of staff corruption. It is one of a number of PSIs which form part of the Security Management Function of the National Security Framework. All Instructions can be accessed via the [National Security Framework](#) website.
- 1.6. Effectively managing the risks posed by corrupt staff is vital for maintaining good order and control of prisons, ensuring a safe environment for prisoners, staff and visitors, and to protect the public. This Instruction supports the operational and strategic management of those that engage in, or who are vulnerable to, corruption while enabling NOMS and partner agencies to share and understand the intelligence picture more fully.
- 1.7. All NOMS staff and those in contracted prisons are expected to perform their duties with the highest levels of professionalism, honesty and integrity. A small minority may choose to abuse their position of public office for their own personal gain. At its most serious this can involve misconduct amounting to criminal behaviour.
- 1.8. *This PSI sets clear expectations for all staff who work in prison establishments (public sector and contracted), in NOMS HQ groups (including regions), that they must not engage in any form of corruption and that they have a duty as employees to report any corruption that they witness, suspect or hear about. The principles must also be applied to sessional and third party workers, volunteers and official visitors who enter prisons or HQ buildings under the authority of NOMS and/or the Governor, or Head of Group.*
- 1.9. **Corruption**, as defined in this PSI, will not be tolerated no matter what the form or the motivation.

- 1.10. *This PSI outlines how staff related intelligence must be processed, developed and managed by a national network of Corruption Prevention Managers in partnership with Law Enforcement Agencies who are responsible for investigating crime.* From the introduction of this PSI, each prison should have a designated Local Corruption Prevention Manager (LCPM) for the purposes of delivering the requirements of this Instruction, supported by a network of centrally-managed Regional Corruption Prevention Managers (RCPM).
- 1.11. PSO 1215 – Professional Standards: Preventing and Handling Staff Wrongdoing is replaced by this PSI. The NOMS Professional Standards Statement can still be found in [PSI 06/2010 - AI 05/2010 – Conduct & Discipline](#) and identifies the high standards of professional and personal conduct that staff are expected to meet. Not engaging in any form of corrupt behaviour is a key element of these standards. A [definition of corruption](#) is formally introduced by this PSI to improve staff understanding of the particular types of corrupt behaviours that may be demonstrated by those working in NOMS. This PSI also underpins the general obligations for supporting those who report wrongdoing under [PSI 21/2013 - AI 08/2013 - Reporting Wrongdoing](#).

#### Desired outcomes

- 1.12. NOMS is committed to working towards detecting, disrupting and deterring all forms of staff corruption and to deal robustly with those discovered to be engaging in such activities. This PSI aims to ensure that in the whole of NOMS there is:
- a) A clearer understanding of what corruption is, how to report it and how to support those who report, as well as those who are vulnerable to corruption
  - b) Greater public confidence as a result of staff corruption being tackled robustly
  - c) An improvement in gathering and developing intelligence about staff corruption
  - d) An improved ability to identify the extent of corruption
  - e) Common standards across the NOMS estate
  - f) More effective working with the police and other agencies
  - g) A culture in which corruption is never tolerated
  - h) Clarity as to the exact role and remit of the Corruption Prevention Unit (CPU) and Regional and Local Corruption Prevention Managers
  - i) A clear understanding of where tactical advice to Corruption Prevention Managers can be sought

#### Mandatory actions

- 1.13. *All staff, including line managers, must read and understand their mandatory obligations under Sections 2, 4, and 5 and the further guidance contained in [Annex A](#) and [Annex B](#).*
- 1.14. *Governors and Heads of Group must ensure that the [corruption definition](#) (Section 2) underpins all local efforts to combat staff corruption, and that all mandatory actions are complied with.*
- 1.15. *All Deputy Directors of Custody (DDC) and Governors must ensure that the operating framework outlined in Section 3 is implemented to deliver a consistent model at local, regional and national level to combat staff corruption.*
- 1.16. *All designated Local and Regional Corruption Prevention Managers (as per Section 3) must comply with the mandatory actions, guidance and principles relating to the management of staff related information within this PSI.*
- 1.17. *All staff appointed to the role of LCPM must attend the 3 day national training course 'Local Corruption Prevention Manager (LCPM)'. **This is a mandatory requirement and must be completed ideally prior to the LCPM taking up post, but at least within 6 months of***

***taking up the post.*** It is recommended that all RCPMs also attend this course and, where they are appointed, Deputy LCPMs are also able to attend the course.

#### Application

- 1.18. *All staff must be familiar with this instruction to enable the appropriate identification and reporting of corrupt activities amongst staff.*
- 1.19. *All line managers and Corruption Prevention Managers must be familiar with this instruction to support any member of staff who may approach them to discuss corruption related matters and to ensure the information is processed appropriately.*

#### Resource Impact

- 1.20. This PSI introduces no additional staffing requirements. In the Prison Service, it formalises the existing NOMS Corruption Prevention 'operating framework'. Each prison should have in post a designated Local Corruption Prevention Manager responsible for managing any information received relating to staff corruption. ***All staff appointed to this role must attend the 3 day national training course 'Local Corruption Prevention Manager (LCPM)'. This is a mandatory requirement and must be completed ideally prior to the LCPM taking up post but at least within 6 months of taking up the post.***
- 1.21. By the end of the LCPM course, learners will be able to:
- Implement a robust corruption prevention strategy to meet the requirements of this PSI;
  - Identify actions and behaviours displayed by staff who are, or may become corrupt;
  - Identify a range of options to detect, disrupt and deter wrongdoing.
- 1.22. It is recommended that all RCPMs also attend this course and, where they are appointed, Deputy LCPMs are also able to attend the course.
- 1.23. The resource impact of this PSI will vary between regions and prisons dependent on the level of intelligence received and type, category and location of the prison. There is discretion as to the resources and time allocated to the roles, but the benefits of robust management of staff corruption are significant and in many cases should result in a net saving to NOMS. Working from this PSI can assist senior managers in understanding the potential size, nature and level of the threat and can also assist in the most appropriate allocation of available resources to combat corruption.

(Signed)

**Digby Griffith**  
**Director of National Operational Services, NOMS**

## Operational Instructions

Text within shaded boxes indicate outcomes from the Service Specification for “**Security Management**” that will be achieved if this PSI is implemented

### 2. Corruption Definition

Staff are aware of the security, professional and personal standards expected of them

- 2.1. *All Deputy Directors of Custody (DDC), Governors and Heads of Groups must ensure that the following definition underpins and drives all NOMS corruption prevention arrangements within prisons (public and contracted) and HQ groups. Line managers must ensure all staff reporting to them are fully aware of their responsibilities under this PSI.*
- 2.2. *All staff must familiarise themselves with this Section to ensure they understand what forms corruption can take. Staff working with young people (under 18s) must also be clear of their safeguarding and child protection responsibilities. When staff suspect or identify corrupt behaviour, they must ensure that they report the corruption and also satisfy themselves that any actual or potential harm to a young person is reported using child protection procedures. NOMS’ safeguarding and child protection procedure is outlined in [PSI 08/2012 - Care and Management of Young People](#).*

#### What Corruption is:

- 2.3. **Definition** – ‘Corruption occurs when a person in a position of authority or trust abuses their position for their or another person’s benefit or gain. In NOMS, this would include the misuse of their role in order to plan or commit a criminal act, or a deliberate failure to act to prevent criminal behaviour’. This includes actual or attempted conveying of restricted items into prisons, aiding escape, unauthorised disclosure of information, accepting or seeking bribes, inappropriate relationships, blackmail, taking or seeking money or other favours for commercial purposes, for moving or reclassifying prisoners, or theft of prisoner’s money or property.
- 2.4. *The element of ‘benefit’ or ‘gain’ must be interpreted widely and can include financial, emotional, sexual or other personal and/or work related reasons. It can also include instances where an employee believes that they have a moral obligation or entitlement to ‘ignore or break the rules’ for the greater good. This is otherwise known as ‘noble cause’ corruption.*
- 2.5. There is an increased risk of corruption where inappropriate relationships are formed between staff and prisoners and/or their family or friends. In some instances such relationships themselves may constitute or involve criminal conduct (such as the common law criminal offence of Misconduct in Public Office), therefore they are included in the remit of this PSI.
- 2.6. *Staff must not have private interests that interfere or could interfere with the proper discharge of their duties. This includes financial and business interests, secondary employment, and also any personal relationships (for example, with colleagues or people outside of the Service) which could compromise or be perceived to compromise them in the discharge of their duties. Staff must bring any potential conflicts of interest to the attention of their line manager and submit a potential conflict of interest declaration - see paragraphs 5.6 – 5.10. All staff have an individual and a collective responsibility to maintain the standards set by both the [Civil Service Code](#) and NOMS.*

- 2.7. A non-exhaustive list of examples of criminal activities and/or inappropriate behaviours that fall within this definition can be found below, and further guidance can be found at [Annex A](#):
- Possession within a prison without authorisation of a device capable of transmitting or receiving images, including cameras in all forms, sounds or information by electronic communications (such as a mobile phone or SIM card);
  - Conveying into or out of a prison without authorisation:
    - a firearm, component part thereof or ammunition
    - any other offensive weapon
    - drugs
    - alcohol
    - mobile phones and accessories
    - IT equipment
    - tobacco
  - Staff assisting a prisoner to escape;
  - The unauthorised/inappropriate categorisation/allocation/transfer of prisoners;
  - Bribery;
  - Blackmail;
  - Conspiracy to pervert the course of justice;
  - Unauthorised disclosure of information;
  - Theft;
  - Fraud;
  - Inappropriate relationships sexual/emotional/personal/financial – With Prisoners;
  - Inappropriate relationships sexual/emotional/personal/financial – With Non Prisoners in conflict of professional obligations (ex prisoners, their friends, families or criminal groups).
- 2.8. Staff corruption can take many guises and in its most extreme form can include the involvement in serious organised crime. The definition of [corruption](#) is therefore intended to include conduct that might result in prosecution for a variety of offences including those under the Offender Management Act 2007, other relevant legislation, and the common law offence of Misconduct in Public Office.

#### **What Corruption is not:**

- 2.9. Corruption does not include criminal offences which are not motivated by gain or other matters that are clearly misconduct or management issues falling short of the [corruption definition](#).
- 2.10. *Serious suspected crime perpetrated by staff not covered by the [corruption definition](#) must be dealt with under the Memorandum of Understanding for Reporting Crime in Prisons. Further advice is available from the NOMS Operational Partnerships Team (OPT) on 0300 047 6357. Management issues must be addressed under the appropriate human resource policies. Advice is available on human resource matters from the Shared Services Connected Limited (SSCL) on 0845 010 3504 or via the '[My Services](#)' section of the intranet.*
- 2.11. A non exhaustive list of criminal offences and/or management issues that do not fall within the corruption definition can be found at [Annex B](#). This also provides guidance on how to get advice and address these issues.

### 3. Corruption Prevention Operating Framework

Arrangements are in place to share and disseminate information with criminal justice stakeholders lawfully

Crime is reported and subsequent investigations are supported

- 3.1. *All DDCs, Governors, and Heads of Group must ensure the requirements of this Section are implemented to ensure a consistent national corruption prevention operating framework is in place.*
- 3.2. This framework has three distinct levels at national, regional and local level to ensure that corruption related intelligence is collected, analysed and managed in the most efficient, secure and effective manner across NOMS in accordance with data protection principles. Individual cases are progressed locally in partnership with Law Enforcement Agencies. Intelligence is shared at regional and national level to identify corruption threats and to enable risks to be effectively managed.
- 3.3. *Staff working with young people (under 18s) must be clear of their safeguarding and child protection responsibilities. When staff suspect or identify corrupt behaviour, they must ensure that they report the corruption and also satisfy themselves that any actual or potential harm to a young person is reported using safeguarding and child protection procedures. NOMS' safeguarding and child protection procedure is outlined in [PSI 08/2012 - Care and Management of Young People](#).*

#### National arrangements – Level 3

- 3.4. The Corruption Prevention Unit (CPU) in Security Group assesses the risk posed by staff corruption across the whole of NOMS at a national operational level. The CPU acts as an intelligence hub through which all corruption intelligence is passed between prisons and the police, and ensures a full and accurate strategic analysis of the level, location and nature of corruption across the NOMS prison estate. This in turn enables CPU to negotiate the most appropriate policing response as necessary. CPU also manages and tasks a network of RCPMs with responsibility for supporting and coordinating corruption prevention activity at a regional level. *CPU staff must be security cleared to at least SC level.*
- 3.5. The core obligations to share intelligence with the police are set out in the Memorandum of Understanding (MoU) entitled 'An agreement between the National Offender Management Service (NOMS) and the Police Service regarding the reporting and investigation of NOMS staff corruption'. The MoU is under review and a revised version will be published in due course. It is important to note that nothing in the MoU is intended to undermine working arrangements with the police at local level, but rather to over-arch local practices with one national policy. The aim of the MoU is to develop closer and more effective working relationships between NOMS prisons and the police in respect of corruption prevention and to give primacy to the police in respect of corruption investigations.
- 3.6. There may be occasions when it is not possible to progress a case locally or regionally given the individual circumstances of the case. The CPU can provide advice on the options for developing corruption intelligence and can assist senior managers in determining the most appropriate course of action.
- 3.7. The HQ Corruption Prevention Manager will support all NOMS staff based in NOMS London HQ functions. The CPU will act as the HQ Corruption Prevention Manager and will support National Training Services, Shared Services Connected Limited and any other outlying business unit.

### Regional arrangements – Level 2

- 3.8. For the purposes of delivering the responsibilities of this PSI, every prison – public and contracted - will have allocated to it a named RCPM with responsibility for supporting and coordinating corruption prevention activity at a regional level. The RCPM has the highest levels of personal and professional integrity and will be appointed on account of their competence, credibility, discretion and experience. *RCPMs must be security cleared to at least SC level. Individuals being appointed to the RCPM role must declare any potential conflicts of interest that may interfere with the proper discharge of their corruption prevention duties. This must be disclosed to the CPU, in line with paragraphs 5.6 – 5.10.*
- 3.9. RCPMs are centrally managed; this secures the ability to flex regional resources to operational priorities and threats as dictated by corruption intelligence and its subsequent development through to disciplinary or police investigations. A central Tasking and Coordination process is in place.
- 3.10. RCPM duties include:
- acting as a point of contact and source of information for local staff (LCPMs in particular) on corruption prevention matters
  - supporting their LCPMs to have the required skills for the role
  - assisting trainers with the delivery of the LCPM Course
  - assisting LCPMs in raising awareness of corruption prevention issues
  - working with all prisons to ensure they demonstrate compliance with this PSI
  - confidential handling of intelligence material
  - the evaluation, dissemination and disclosure of the information to others
  - ensuring all corruption related report (CPR) disseminations are submitted to CPU
  - providing CPU with a monthly report
  - building and maintaining good working relationships with the police forces in their region(s)
  - providing assurance to Deputy Directors of Custody that the threat of corruption is being managed effectively in the regions
  - ensuring through the LCPM, that staff at all levels are conscious of actual or potential harm to young people (under 18s) and make child protection referrals where harm is identified. NOMS' safeguarding and child protection procedure is outlined in [PSI 08/2012 - Care and Management of Young People](#).

### Local arrangements – Level 1

- 3.11. It is important that everyone working in NOMS feels confident and encouraged to report all forms of misconduct, including staff corruption. Establishments should designate and appoint an LCPM who will receive and manage information on corruption and who works with their analyst, who can add significant amounts to the management, development and understanding of intelligence. *The LCPM must ensure all staff and official visitors know what to report, how to do so and who to report to. This includes those directly employed, contractors, agency staff, volunteers, sessional workers, professional visitors and any other individual who is authorised to work with NOMS/prisoners. This will be achieved by:*
- *ensuring that staff know who the LCPM is*
  - *ensuring staff know what behaviours constitute corruption*
  - *promoting a culture that encourages the reporting of corruption*
  - *ensuring that all staff and visitors report corruption promptly and processes are in place to remind them of this regularly throughout the year*
  - *ensuring that the systems in place are operated with integrity*

- *ensuring good working relationships with the local police force*
- 3.12. *There must be sufficient capability to handle and develop staff corruption related intelligence. The LCPM must be recognised as having the highest levels of personal and professional integrity. The LCPM must be someone to whom all groups of staff feel confident in disclosing information when discretion is needed. When selecting the person for this role account must be taken of competence, credibility, discretion and experience. Resources provided to this role must be sufficient to meet the responsibilities detailed in this PSI. Individuals being appointed to the LCPM role must declare any potential conflicts of interests that may interfere with the proper discharge of their corruption prevention duties. This must be disclosed via their line manager in line with paragraphs 5.6 - 5.10.*
- 3.13. *The LCPM must report to the Deputy Governor or equivalent, or Governing Governor, in respect of activities carried out in compliance with this PSI. If they are line managed on other duties and/or by another manager, the different lines of reporting and accountability must be clearly set out and understood by all. These duties must be reflected in their SPDR.*
- 3.14. *LCPM duties must include:*
- *acting as the point of contact on corruption prevention matters*
  - *acting as support for vulnerable staff*
  - *raising awareness of corruption, how to avoid it and how to report it*
  - *building and maintaining a good working relationship with Shared Services Connected Limited, HR policy and caseworkers who can provide valuable advice on engaging staff*
  - *the receipt and confidential handling of intelligence material*
  - *the evaluation, dissemination and disclosure of the information to others as appropriate*
  - *the submission of all corruption related CPR disseminations to the CPU in line with the NOMS MoU*
  - *providing CPU and the RCPM with a monthly report*
  - *building and maintaining a good working relationship with the Prison Intelligence Officer (PIO) and local police force*
  - *co-ordinating the tasking and development of intelligence operations as appropriate, taking into account wider aspects of prison security*
  - *ensuring that staff at all levels are conscious of actual or potential harm to young people (under 18s) and make child protection referrals where harm is identified*
- 3.15. *Where the police or more senior manager has become involved in the investigation, the LCPM should only provide a support/facilitator role. The LCPM must ensure integrity of the process and objectivity of the disciplinary investigation. This will be found by using an independent lead investigator.*

#### 4. Reporting Corruption

Staff are aware of the security, professional and personal standards expected of them

##### All staff responsibilities

- 4.1. *All staff must familiarise themselves with this Section to ensure they understand how to report corruption and their responsibilities for doing so. Where applicable, staff must also be conscious of actual or potential harm to young people (under 18s) and make child protection referrals where harm is identified.*
- 4.2. Corruption, as defined in this PSI, will not be tolerated no matter what the form or the motivation. *NOMS staff, staff of contracted prisons and anyone else working for NOMS through an external company or agency must not engage in corruption and they must report any corruption they witness, suspect or hear about without delay.* This obligation arises from the core values of integrity and honesty expected of any public servant, which underpin the standards of behaviour set out in the Civil Service Code and in the Codes of Conduct for all contracted employees.
- 4.3. *A report of corruption must relate to behaviour that falls within the definition of corruption and could include unsubstantiated, unproven or unspecific information.* The information will be fully evaluated and where possible corroborated with other information that may be already held by the organisation or by law enforcement partners. *In addition, approaches to staff by prisoners, colleagues, or others, to engage in corruption must be reported in line with this PSI.* Failure to report corruption by others may itself be a disciplinary or even a criminal offence.
- 4.4. Providing that reports are made in good faith and in the reasonable belief that the information provided tends to demonstrate corruption, the person making the report will not be penalised if it turns out to be mistaken.

##### Allegations made in bad faith

- 4.5. It is unacceptable for any individual to make a false or malicious report or allegation. Disciplinary action may be taken if this is found to be the case.

##### Primary Methods of Reporting

###### Prison Staff

- 4.6. *The primary reporting method for prison based staff must be to submit their concerns using the Mercury Intelligence System's Confidential Corruption Prevention Report (CPR) in line with the PSIs issued under Function 4 of the National Security Framework.* In exceptional circumstances, where a Mercury CPR is not possible, this is the only time a paper based submission may be used. *Any paper based submissions must be completed and delivered by hand to the Local Corruption Prevention Manager (LCPM) within their establishment.*
- 4.7. There may be prison based staff who do not use the CPR system or who are not trained to do so. *Such staff can report concerns verbally or in writing to the LCPM who will then ensure the information is recorded on to Mercury word-for-word.*
- 4.8. *Staff who encounter corruption situations which involve fraud and/or theft must ensure that they also report the fraud and/or theft allegations to the Head of Internal Audit & Assurance Unit in line with PSO 1310 - Anti Fraud Strategy.*

Other Staff

- 4.9. *Staff located in regional offices must report any concerns using a CPR on Mercury.*
- 4.10. *Staff based in NOMS London HQ functions and who have access to the Quantum system, must submit a CPR on Mercury. Those who do not have Quantum access, must report any concerns to the HQCPM. Staff based in National Training Services, Shared Services Connected Limited and any other outlying business unit dealing with prison matters must report any concerns to the CPU using one of the routes described below (4.11).*

How to Report In Exceptional Circumstances – for all staff

- 4.11. *It is important that staff feel they are reporting to someone they trust and so in exceptional circumstances, where they do not feel confident to use the primary reporting routes set out in paragraphs 4.6 – 4.10 above, they must be given flexibility and discretion over who they report to and the method they use. Staff can therefore report their concerns to one (or more) of the following:*

- their LCPM
- their RCPM
- the CPU via
  - the Reporting Wrongdoing Hotline – 01527 544777
  - a confidential address – HM Prison Service, PO Box No. 10656, Redditch, B97 6ZU
  - the functional mailbox [corruptionpreventionunit@noms.gsi.gov.uk](mailto:corruptionpreventionunit@noms.gsi.gov.uk)
- their line manager (*who must pass this information on to the LCPM, RCPM or CPU immediately and in confidence*)

MoJ and NOMS Reporting Wrongdoing Hotline

- 4.12. The national Reporting Wrongdoing Hotline at the CPU can be used by staff, visitors or members of the public to report corruption. Calls to the Hotline will be answered by CPU staff Monday to Friday between 0900 and 1700 hours. Outside of these hours, or where it is not possible to answer a call immediately, an answering machine will be in operation. All calls will be treated in confidence. The information imparted will be evaluated, recorded and disseminated for action. It should be emphasised that CPU's work is essentially strategic; it is not resourced to carry out individual investigations on a routine basis.

What information to provide

- 4.13. *Staff must provide as much detail as possible to enable further action to be undertaken. The following can assist staff to understand what information they must aim to provide if they have it:*
- **Who** - Name, grade and place of work of alleged perpetrator. Are any others involved? Does anyone else know about it? Are any prisoners or their family involved?
  - **What** - What happened? What is the incident about?
  - **Where** - Where did the incident happen? (E.g. in an establishment on a particular wing or outside an establishment?)
  - **When** - When did/does the alleged activity take place - dates, times and frequency (e.g. always on nights)
  - **Why** - Is this for the alleged perpetrator's or someone else's financial gain or for another reason (E.g. because someone is being bullied?)

- **How** - How did you become aware of the alleged activity and how is it being undertaken? (E.g. in a case where unauthorised items are being brought into a prison, how are the items getting into the establishment?).

4.14. *Staff must note that all information – however great or small - must be reported.*

### **Confidentiality**

- 4.15. All corruption reports, however made, will be treated in confidence. However, those who report corruption must be aware that the information they provide may be required to support disciplinary proceedings and/or a criminal investigation. NOMS starting position in these cases will always be to disclose the information in a redacted or sanitised form. In some cases, withholding the reporter and/or source's identities may be possible. If disclosing in a sanitised form is not possible, the report and/or the information it contains, may be disclosed and the reporter may be required to give evidence both internally and to external bodies such as criminal courts or inquiries. *If the need to disclose/give evidence is likely to arise, the LCPM must discuss the situation with the reporter and arrangements put in place to manage the process prior to, during, and after disclosure. LCPMs must ensure that a clear risk assessment is conducted in relation to this and that any necessary support mechanisms are in place.*
- 4.16. *Staff working with young people (under 18s) must also be clear of their safeguarding and child protection responsibilities. As part of the risk assessment, consideration of the impact on under 18s must be undertaken, ensuring the best interests of the young person is taken.*
- 4.17. It should be noted that where reporters withhold their identity, the ability to then evaluate, verify and take action on the information may be significantly limited.
- 4.18. *All information received from staff must be protectively marked to an OFFICIAL - SENSITIVE level, handled and stored in accordance with [PSI 12/2014 – AI 10/2014 – PI 04/2014 - Government Secure Classification Policy](#). Ensure all information is protected physically within a secure building by a single lock (e.g. a locked drawer, container or locked filing cabinet). Further guidance can be obtained from the Information Policy and Assurance Team (Informationassurance@noms.gsi.gov.uk).*

## 5. Support for Staff

Staff are aware of the security, professional and personal standards expected of them

- 5.1. An effective prevention strategy will identify where prisons and HQ teams, their staff and others working within them are most vulnerable to corruption. The prevention strategy will then develop policies, processes and working practices to reduce the risk, and where possible eliminate that vulnerability.

### Sources of support for reporters of corruption and/or those making Conflict of Interest Declarations

- 5.2. *All staff and line managers must familiarise themselves with the requirements of this Section.*
- 5.3. *All staff, irrespective of grade, must promote a supportive culture in which directly employed and non-directly employed staff, (contractors, agency staff, volunteers, sessional workers, professional visitors and any other individual who is authorised to work with NOMS/prisoners) who may be vulnerable to corruption are encouraged to come forward and raise the matter with the LCPM, RCPM, line management or CPU. Staff who are aware that a colleague may be vulnerable must also be encouraged to come forward.*
- 5.4. *All staff working in prisons – public and contracted - must be shown the ‘Conditioning, Manipulation and Corruption Prevention Awareness’ DVD and provided with the accompanying training by the LCPM and/or training lead for the establishment. It is good practice to incorporate this with the “key talk”, to ensure all new staff receive training. Graduates of Prison Officer Entry Level Training (POELT) will have been shown it as part of their training, but it is good practice to show the DVD again on them joining their establishment, to refresh and reinforce their learning. This training has been developed to offer the opportunity for all staff to explore the potential causes and effects of conditioning and manipulation and to understand the steps to take to prevent themselves becoming corrupt. The training includes staff’s responsibilities to report wrongdoing and the support mechanisms available to them.*
- 5.5. It is important to ensure that appropriate support is available to staff who report corruption in line with this PSI. They need to be made aware of the support available to them through the management line, Workplace Support, Trade Unions, and other organisations both within NOMS and outside. *Staff must not be subjected to any detriment for approaching management with their concerns.*

### Vulnerability to manipulation and/or conditioning – Conflict of Interest Registers

- 5.6. Vulnerability to corruption may arise through pressure and manipulation by prisoners, their families or associates or staff, as a result of matters outside of the work environment, or from personal circumstances which may make a member of staff open to financial or other inducements (see also paragraph 2.6).
- 5.7. A vital tool to identify, support and manage staff that may be vulnerable to corruption is the use of the Conflict of Interest (COI) Register. This is a mandatory requirement set out in [PSO1310 - Anti Fraud Strategy](#) and requires all staff to declare any financial, business or private interests that could compromise, or be perceived to compromise, the proper discharge of their duties, for example, secondary employment. This requirement is also clearly stated in the NOMS Professional Standards Statement which can be found in [PSI 06/2010/ AI 05/2010 – Conduct & Discipline](#) which outlines the high standards of professional and personal conduct all staff are expected to meet.

- 5.8. It is good practice for each LCPM to manage the COI system for the establishment that they cover, given the potentially sensitive nature of any declaration and the need to deal with the information in confidence. Where a conflict spans more than one establishment (e.g. a prisoner is acquainted with prison staff working in more than one establishment), it is good practice for the RCPM to liaise and ensure that the relevant line manager and LCPM in each establishment is equally aware of the potential conflict and is managing it consistently. In HQ the responsibility for managing the COI system will be the HQCPM and the Head of Group. Where a conflict spans more than one Unit, the Director will manage the system.
- 5.9. *The LCPM must make an assessment of the risk posed by any disclosed information, in consultation with the member of staff concerned.* The LCPM will suggest a risk management strategy to the Governor (and RCPM - where conflicts span more than one establishment); this may include recommendations on restricting the locations or activity of the person concerned, such as not working with a particular prisoner or in a particular area. The Governor (and RCPM - where conflicts span more than one establishment) will make the final decision on any action to be taken. The CPU can be consulted for advice on a risk management strategy. *An audit trail must be kept using a Management Risk Assessment Form.*
- 5.10. Further information and templates for a Conflict of Interest or Vulnerability Declaration Form, a Management Risk Assessment Form and COI Register can be obtained from the policy holders of [PSO1310 - Anti Fraud Strategy](#) on 0300 047 5200.



## National Offender Management Service

### Annex A

#### Examples of Corrupt Activity

Below is a list of example activities that are included within the corruption definition. CPU uses the listed activities to categorise reports of corruption. ***It must not be viewed as an exhaustive list as it cannot cover all possible eventualities.*** Further advice can be obtained from CPU.

In this context 'conveying' means to take, carry or transfer items, or the communication of messages in any format, **IN** or **OUT** of a prison or NOMS premises. In some of these cases such activity may be undertaken with the purpose of facilitating criminal activity and/or inappropriate relationships with prisoners, ex prisoners, their friends and family, criminal associates or any other unauthorised person.

<b>Corrupt Activity</b>	<b>Description</b>
Possession within a prison, without authorisation, of a device capable of transmitting or receiving images, sounds or information by electronic communications	This includes mobile phones, component parts, SIM cards, and any article designed or adapted for use with such devices (Section 40D of the Prison Act). <i>All intelligence relating to staff found in possession of such articles must be disseminated in line with this PSI; including where it has been assessed and dealt with as a management issue locally. Intelligence relating to prisoners found in possession of such articles must only be processed under this PSI where it is alleged to link to staff corruption.</i>
Conveying into or out of a prison without authorisation a firearm, component part thereof or ammunition	Section 40B of the Prison Act 1952.
Conveying into or out of a prison without authorisation any other offensive weapon	Including knife, knuckle duster (Section 40B of the Prison Act 1952).
Conveying into or out of a prison without authorisation controlled drugs	Any drug controlled under the Misuse of Drugs Act 1971, including some steroids and some prescription medication (Section 40B of the Prison Act 1952). Advice on whether or not a drug is controlled can be obtained from <a href="http://www.talktofrank.com">www.talktofrank.com</a> or the Key Threats Team in NOMS HQ.
Conveying into or out of a prison without authorisation alcohol	Section 40C of the Prison Act 1952.
Conveying into or out of a prison without authorisation mobile phones & accessories	Section 40C of the Prison Act 1952.
Conveying into or out of a prison without authorisation IT equipment	Cameras, sound recording devices, laptops, data sticks etc. (Section 40C of the Prison Act 1952).
Conveying into or out of a prison without authorisation tobacco	Section 40C of the Prison Act 1952.
Conveying into or out of a prison without authorisation 'other' prohibited items	Including those set out in 'list C' in rule 70A of the Prison Rules 1999: Money, clothing, food, drink, letters, paper, books, tools (Section 40C of the Prison Act 1952). Also including magazines, games consoles, DVDs,

	photographs etc (rule 70 of the Prison Rules 1999), if there is intent that the items should come into the possession of a prisoner. And also anything prohibited by locally set rules or regulations
Staff assisting with escape	Would include the bringing of an implement to be used to facilitate an escape into prison, and giving information to assist an escape (Section 39 of the Prison Act 1952).
Bribery	Bribery includes a person offering, promising or giving to another person a financial payment or another advantage to induce or reward the improper exercise of a function or activity. Bribery also includes the person requesting, agreeing to receive or accepting a bribe (as defined by the Bribery Act 2010). This may be carried out, for example, for a commercial purpose, to sway a particular decision within a prison.
Blackmail	Blackmail is an unwarranted demand made with menaces with a view to gain to the person or another or with intent to cause loss to another (Section 21 (1) Theft Act 1968). 'Menaces' might include threatened violence to a person or property, a threat to disclose sensitive information, or threats of any other action detrimental to the person threatened. <i>Where blackmail is committed by staff, it must be treated as corruption in accordance with this PSI.</i> Blackmail may also be used by prisoners as an element of the conditioning and manipulation of staff to facilitate the trafficking of illegal and/or prohibited items in to a prison, or to engage in any other inappropriate behaviour.
Perverting the course of justice	Examples could include fabricating documents, or evidence, making false statements to the police, or interfering with witnesses or jurors.
Unauthorised disclosure of information	<p>This could involve advising or providing information to the media or other unauthorised persons in breach of the Government Security Classification Scheme and/or Data Protection Act obligations.</p> <p>Information can include photographs, official documents relating to the work of prisons or other NOMS Groups, or personal data relating to staff or prisoners. It can also include disclosure from IT systems that may be in use – which can be in the form of electronic files, paper based documents or even the verbal passing on of information. See <a href="#">PSI 24/2014 – AI 18/2014 – PI 18/2014 – Information Assurance Policy</a>; <a href="#">AI 03/2009 - Information Assurance</a> and <a href="#">PSI 44/2014 – AI 28/2014 – PI 61/2014- Data Protection 1998, FOI 2000 and Environment Regulations 2004.</a></p>
Inducement for the inappropriate categorisation/allocation/transfer of prisoners	Gain or inducement from prisoners and/or the criminal fraternity in exchange for the inappropriate re-categorisation of prisoners and/or their movement between establishments.

Theft	Theft is the dishonest appropriation of property belonging to another with the intention of permanently depriving the other of it (Section 1 of the Theft Act 1968). This includes property that the staff member has access to in the course of their duty e.g. theft of money from post, prison, prisoner or another staff member's property.
Fraud	Fraud is a criminal offence created under the Fraud Act 2006. The three ways that fraud can be committed, as set out in the Act, are False Representation; Failure to disclose information when there is a legal duty to do so and Abuse of position.
Inappropriate relationships sexual/emotional/personal - Prisoner	Any relationship with a prisoner where there is an element of a sexual nature e.g. kissing, holding hands, oral sex, intercourse; or emotional commitment (love or a friendship that oversteps professional boundaries).
Inappropriate relationships sexual/emotional/personal – Non Prisoner	Any relationship with ex prisoners, partners, immediate family or close associates, if not formally declared to Governor or Head of NOMS unit as a potential 'Conflict of Interest'.
Misconduct in public office and procedural irregularity	A public officer acting as such wilfully neglects to perform their duty and/or wilfully misconducts themselves – amounting to an abuse of public trust. NOMS considers any person working in prisons, who has contact with prisoners and/or keys if they have been issued keys, to hold a "public office" for the purposes of this offence. That is because, irrespective of their "main" role, they all have an overriding and common responsibility to ensure the maintenance of security, good order and discipline of the prison, for example by ensuring locks, gates and doors are properly secured and intelligence is reported to the Security Department.
Relating/Supporting Information – to <i>existing corruption information</i>	Any 'misconduct' that does not fall under the corruption definition (i.e. Management concerns with no criminal element) but is evaluated as relating to existing corruption related intelligence. Examples include drug dog indications, secondary employment that may have links to the existing intelligence, patterns in shifts/detail to facilitate working in certain areas or on certain days; seek further advice from CPU.



**Annex B**

**Activities that do not meet the Corruption Definition**  
**Examples and alternative reporting routes**

This list provides guidance on those activities or behaviours that **do not** meet the corruption definition. It provides basic advice as to alternative routes to further information. Should any of the activities be linked to a behaviour that **does** meet the corruption definition then it is appropriate to include it in that corruption related report (See [Annex A](#)).

Non-corruption category	Description	Routes to further information
Abuse of sick leave	Falsely claiming to be sick or working whilst on sick leave	<ul style="list-style-type: none"> <li>Line management chain in the first instance; Shared Services Connected Limited can advise on HR policy</li> <li><a href="#">PSO 1310 – Anti Fraud Strategy</a></li> <li>Fraud Investigation Unit’s helpline 0300 047 5200</li> <li><a href="#">PSI 06/2010 - AI 05/2010 – Conduct &amp; Discipline</a></li> <li><a href="#">PSI 21/2013 - AI 08/2013 – Reporting Wrongdoing</a></li> </ul>
Secondary employment	Unauthorised or inappropriate	<ul style="list-style-type: none"> <li>Line management chain in the first instance; Shared Services Connected Limited can advise on HR policy</li> <li><a href="#">PSO 1310 – Anti Fraud Strategy</a></li> <li>Fraud Investigation Unit’s helpline 0300 047 5200</li> <li><a href="#">PSI 06/2010 - AI 05/2010 – Conduct &amp; Discipline</a></li> </ul>
Assault on any individual on prison property	Assault on a prisoner or other (e.g. a colleague)	<ul style="list-style-type: none"> <li>Line management chain.</li> <li>Reporting crime in prisons procedures – Operational Partnerships Team.</li> </ul>
Assault on any individual outside of prison property	Violent behaviour outside of work.	<ul style="list-style-type: none"> <li>Line management chain.</li> <li>Police.</li> </ul>
Breach of HMPS policy on Diversity	E.g. Harassment, bullying, victimisation, racism, sexism in or outside of the workplace	<ul style="list-style-type: none"> <li>Line management chain in the first instance; Shared Services Connected Limited can advise on HR policy</li> <li><a href="#">PSI 33/2011 – AI 11/2011 Equality of Treatment for Employees.</a></li> <li><a href="#">PSI 21/2013 - AI 08/2013 - Reporting Wrongdoing.</a></li> </ul>
Personal financial irregularities/problems	E.g. large debts, gambling,	<ul style="list-style-type: none"> <li>Line management chain in the first instance; Shared Services Connected Limited can advise on HR policy</li> <li><a href="#">PSI 06/2010 - AI 05/2010 – Conduct &amp; Discipline</a></li> <li>Workplace Support</li> </ul>
Terrorist/extremist behaviour or links		<ul style="list-style-type: none"> <li><a href="#">PSI 43/2011 – Managing and reporting on extremist behaviour in custody</a></li> <li>Extremism Unit – 0300 047 6163/6157</li> <li>Operational Partnerships Team.</li> </ul>

Misuse of IT/office equipment	E.g. excessive personal use	<ul style="list-style-type: none"> <li>• Line management chain in the first instance; Shared Services Connected Limited can advise on HR policy</li> <li>• <a href="#">PSO 1310 – Anti Fraud Strategy</a></li> <li>• Fraud Investigation Unit’s helpline 0300 047 5200</li> <li>• <a href="#">PSI 25/2014 – AI 19/2014 – PI 19/2014 – IT Security Policy</a></li> <li>• <a href="#">PSI 06-2010/AI 05-2010 – Conduct &amp; Discipline</a></li> <li>• <a href="#">PSI 21/2013 - AI 08/2013 - Reporting Wrongdoing</a></li> <li>• <a href="#">PSI 24/2014 –AI 18/2014 – PI 18/2014 – Information Assurance Policy &amp; AI 03/2009 - Information Assurance</a></li> <li>• Managers can request an examination of Quantum and OMNI usage by contacting:informationassurance@noms.gsi.gov.uk</li> </ul>
Alcohol/drug abuse by staff	Personal use	<ul style="list-style-type: none"> <li>• Line management chain in the first instance; Shared Services Connected Limited can advise on HR policy</li> <li>• <a href="#">PSI 06/2010 - AI 05/2010 – Conduct &amp; Discipline</a></li> <li>• <a href="#">PSI 34/2013 / AI 14/2013 – Staff Alcohol Policy.</a></li> <li>• Workplace Support.</li> </ul>
Criminal charges	Previous charges/convictions that were not declared, or new charges/convictions (but not resulting from ‘corruption’ activities e.g. assault outside of work)	<ul style="list-style-type: none"> <li>• Line management chain in the first instance; Shared Services Connected Limited can advise on HR policy</li> <li>• <a href="#">PSI 06/2010 - AI 05/2010 – Conduct &amp; Discipline</a></li> </ul>
Abuse of work allowances - such as hours (SPAR/flexi), annual leave, travel and subsistence and personal allowance.		<ul style="list-style-type: none"> <li>• Line management chain in the first instance; Shared Services Connected Limited can advise on HR policy</li> <li>• <a href="#">PSO 1310 – Anti Fraud Strategy</a></li> <li>• Fraud Investigation Unit’s helpline 0300 047 5200</li> <li>• <a href="#">PSI 06/2010 - AI 05/2010 – Conduct &amp; Discipline</a></li> <li>• <a href="#">PSO 8410 – Flexible Working Hours.</a></li> </ul>
Any other HR related matters - such as issues with grievances, complaints, SPDR investigations		<ul style="list-style-type: none"> <li>• Line management chain in the first instance; Shared Services Connected Limited can advise on HR policy</li> <li>• <a href="#">PSO 8550 – Staff Grievance</a></li> <li>• <a href="#">PSI 24/2010 - AI 15/2010 Performance Management</a></li> <li>• <a href="#">PSI 06/2010 - AI 05/2010 – Conduct &amp; Discipline</a></li> </ul>