



MANAGEMENT INTERVENTION PROCEDURE

Authorised Professional Practice (APP)

APP is the national body of consolidated professional practice and guidance for policing and is authorised as such by Chief Constables' Council. It significantly reduces the amount of national guidance in circulation, encourages the use of professional discretion and brings consistency to all authorised police practice.

It has the same legal status as previous guidance; it is not the law and so, while police officers and police staff can be expected to have regard to APP in discharging their responsibilities, the status of APP is advisory. There may be circumstances when it is perfectly legitimate to deviate from APP, provided that there is clear rationale for doing so.

This Procedure has been checked against APP. Gwent Police will adopt any relevant APP provisions, with supplementary information contained herein, which reflects local practice and the needs of the communities served by Gwent Police.

Introduction

Gwent Police recognises that there is a risk of some staff behaving unprofessionally and of very rarely becoming involved in criminal activity. Such cases are dealt with by way of criminal or misconduct investigation and are resolved by those means. There are however, a number of cases in which intelligence is received, which cannot be corroborated or developed by further enquiries to a point at which a full investigation would be justified. In some of these cases the intelligence has the potential to raise concern as to the behaviour or integrity of officers or staff, or of the potential position of vulnerability in which they could be placing themselves and Gwent Police. In these cases, Gwent Police has an obligation to advise and thereby protect the individual officer or staff member and the Force.

1.0 Procedure

- 1.1 Most cases are dealt with by criminal or misconduct investigations. Where intelligence, which has the potential to raise concern as to the behaviour or integrity of officers or staff, or of a potential position of vulnerability is received and which cannot be corroborated or developed by further inquiries to a point at which a full investigation would be justified, a Management Intervention may be considered.
- 1.2 The Gwent Police Anti Corruption Unit holds all intelligence in relation to potential corruption, dishonesty or other unethical conduct by officers and staff of Gwent Police.
- 1.3 All intelligence is received, evaluated and handled in accordance with the principles of the National Intelligence Model.
- 1.4 Where Service Area Commanders or Heads of Department have concerns or intelligence as outlined at 1.1 above, they should forward those concerns, via the Head of Professional Standards Department, to the Anti Corruption Unit. This will ensure a corporate approach, by ensuring that Gwent Police has the full intelligence picture in relation to individual officers and members of staff.
- 1.5 A Management Intervention (known also as Ethical Interview) will only be conducted after a full assessment of the intelligence has been carried out and where, as the intelligence stands, there is nothing to suggest the individual is subject to criminal or misconduct proceedings. The Head of Professional Standards will consider the information and may authorise a Management Intervention Procedure.
- 1.6 Management Intervention will only be carried out by the Professional Standards Department.

- 1.7 An officer or member of staff will be spoken to with the purpose of:
- i) Disclosing to the officer or staff member, aspects of the intelligence or information relating to them which has raised the concerns of the organisation.
 - ii) Affording the officer or staff member the opportunity to provide an explanation or to account for the intelligence, which may alleviate those concerns.
 - iii) Allowing the organisation to provide the officer or staff member with appropriate advice, which may include reference to Force policy or procedure.
- 1.8 Management Intervention is not a component of a criminal or misconduct investigation.
- 1.9 The Intervention will be conducted in accordance with the following principles and procedure:
- i) The officer or staff member will be contacted by a member of PSD/ACU whilst on duty. The meeting will be conducted on that day or in the very near future, to avoid unnecessary delay and concern. If representations or unavailability are an issue, then this will be duly considered.
 - ii) The officer or staff member will not be served with Regulation Notices.
 - iii) The Intervention will not be tape recorded or contemporaneously recorded.
 - iv) The officer or staff member may have a Staff Association or Trade Union representative, line manager or friend present at the meeting.
 - v) A report detailing the Intervention will be made and signed by those present. One copy will be filed within the Anti Corruption Unit. There will be no record of the procedure placed on the officer's or staff member's Appraisal.
 - vi) The Head of Professional Standards Department will decide, after consideration of all the circumstances, whether or not the officer's or staff member's Head of Service Area/Department should be informed.
- 1.10 Though the Management Intervention does not form part of a criminal or misconduct investigation, the fact that an Intervention took place and that certain advice may have been given at a particular time and date, may be relevant in the consideration or event of any future criminal or misconduct proceedings, in the consideration of the [Service Confidence Procedure](#) or the [Inappropriate Association Procedure](#).

- 1.11 Gwent Police will not implement the Management Intervention Procedure in terms which discriminate against any person on the grounds of the protected characteristics as outlined in the Equality Act.
- 1.12 Appropriate information will be recorded in relation to individuals to enable monitoring of potential discrimination to be carried out.
- 1.13 This procedure complies with the requirements of the Management of Police Information. The accuracy, adequacy, relevance and timeliness of the data will be managed through the intelligence-led integrity testing process. The data held will be managed through the Anti Corruption Unit's intelligence system and subject to consideration regarding proportionality, retention, review and disposal. The application to use this tactic will be carefully considered by senior management before going through a quality assured authorisation process.

2.0 The Legal Basis and Legitimate Aims

- Section 6 Police Act 1996 efficient and effective police force.

3.0 Human Rights Certification of Compliance

- 3.1 The procedure has been checked for compliance with the Human Rights Act; with particular reference to the legal basis of its precepts: the legitimacy of its aims; the justification and proportionality of the actions intended by it; that it is the least intrusive and damaging option necessary to achieve the aims; and that it defines the need to document the relevant decision making process's and outcomes of actions.

4.0 Compliance with The Welsh Language Scheme

- 4.1 This procedure aims to comply with the organisations Welsh language Scheme in terms of dealing with the Welsh speaking public, impact upon the public image of the organisation and the implementation of the language scheme.

5.0 Risk Assessment and Health and Safety Considerations

- 5.1 The Gwent Police Service Dynamic Assessment should be applied as necessary. A training package in the use of risk assessment will be provided to all police personnel if requested or required.

6.0 Procedure Identification Section

Procedure Title:	Management Intervention Procedure
Reference:	101/24 b issue 2
ACPO Lead:	DCC
Service Area Owner:	Detective Superintendent, PSD
Department Responsible:	Professional Standards Department
Links to other Policies/Procedure:	Information Security; Data Protection; Service Confidence; Inappropriate Associations.
Summary of Changes:	Protective Marking changed from 'Restricted' to 'Not Protectively Marked'
Procedure Implementation Date:	Issue 2 – 03 January 2013; issue 1 - 03 December 2012; reviewed Nov 14 no change
Procedure Review Date:	Nov 16