The effectiveness of police 'internal affairs departments' in limiting corruption in police services – a literature review

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Abstract

This review presents an analysis of English-language literature on the available knowledge about models of corruption investigation within the policing sector, particularly the role and effectiveness of Internal Affairs Units (IAUs) and Professional Standards Units (PSUs). It examines literature on both the organisation models and the experience from police services in the USA, UK, Australia, Slovenia, Israel and Zimbabwe.

Contents

1. Introduction

There are multiple aspects of IAUs and PSUs warranting discussion in the formation of an anti-corruption strategy for a police service, whether this be departmental, regional or national. As well as guidelines for investigative models, there are numerous categorisations and endorsements of differing modes/degrees of integration of external, independent or 'civilian' input in the management of police integrity in academic literature (Terrill & Ingram 2016; Murphy & McKenna 2014; Jiao 2010; Lamboo 2010). These models all exhibit similarities in their bases for categorization

– degrees of civilian involvement in oversight and/or the investigative process - yet they produce differing categorisations of the forms investigative arrangements may take which proposes questions for the appropriateness of any one framework over others. It is also possible to understand police anti-corruption oversight and investigations through guidelines which are constructed and made available by individual departments and public inquiries (US Department of Justice; HMIC 2015).

This review integrates some accounts of the function of PSUs/IAUs from a range of regionally and culturally dispersed countries. The majority of current insights into police corruption and anti-corruption originates from countries which rank highly in global corruption indexes such as Transparency International's CPI and the World Bank's WGI (World Bank 2016; Transparency International 2017). This review also introduces information from differing countries, integrated with the more prominent accounts from Australia (Prenzler 2011; Finnane 1988; Coaldrake & Wanna 1988), the United States (Terrill & Ingram 2016; Liederbach et al 2007; Jiao 2010), and United Kingdom (HMIC 2015; Moran 2005).

The structure of this review is laid out with the below table of contents. Definitions of police corruption will be explored, as well as broader instances of 'misconduct' and 'operational deviance', with which corruption is often conflated in the literature, as well as in targeted behaviours and concerns of PSUs. Corruption is often handled with greater degrees of separation from other acts of misconduct (Jiao 2010; HMIC 2015). It then reviews literature on mapping the procedural structure of an Internal Affairs Department or Professional Standards Unit and presenting a general breakdown of integrity measures and exercises present in the policing sector. The main section of the review approaches the question of effectiveness of different models, attempting to integrate evidence from the countries Israel, Zimbabwe, and Slovenia, with the comprehensive work originating from the US, UK, Australia etc. for a more balanced overview of police department corruption and anti-corruption.

2. The Environment of Police Department Anti-Corruption and Internal Affairs

Comprehensive understanding of the internal management of police corruption through academic literature analysis has been limited by *"little direct research of any kind on the actual operations and activities of the various models of PIP [Police Investigating Police]"* (Murphy & McKenna 2014).

Nonetheless, there are There are numerous writings on the subject of corruption in police services, including in defining police corruption, misconduct or deviance (Pyman et al 2011; Ivković 2005a; 2005b; 2009; Newburn 2015). In terms of providing an appropriate analysis of the relevant literature on police anti-corruption measures through the use of internal agencies, there is great difficulty in gathering appropriate evidence of specific acts of corruption. For this purpose, though recognizing the inherent problems in this approach, the discussion of IAUs/PSUs considers corruption as a more broad and inclusive term in order to cast a wide theoretical net over the literature. To this end, definitions such as offered by Kleinig (1996: 166), are favoured.

> *"Police officers act corruptly when, in exercising or failing to exercise their authority, they act with the primary intention of furthering private or departmental/divisional advantage"*.

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With loosely specified restrictions, such a definition is not always useful until it is coupled with a breakdown of the kinds of acts which might be included under the broad term of 'corruption' in the policing setting. Furthermore, specific literature dealing with police corruption is occasionally insufficiently abundant to understand the workings of police department integrity measures comprehensively. Literature searches aimed at discovering the enterprise of Professional Standards Units operating globally throughout police services may need to broaden their terms to consider broader issues of 'misconduct' or *"Occupational Deviance"* (Barker 1983).

The accompanying typology provided by Barker (1983) is therefore a useful example of the range of acts covered by the relevant literature to this analysis, and the approaches to categorizing (Fig.1 – Pyman et al 2011; 25). Conflation of police corruption with other forms of misconduct can, as stated, be problematic when analysing the professional standards arrangements of certain forces, such as the Hong Kong Police Force, where misconduct is handled by the Complaints Against Police Office (CAPO), and corruption is investigated by the Anti-Corruption Office (ACO) (Jiao 2010). The difficulties faced by anti-corruption agencies in the policing sector have been widely discussed (e.g. Ivković 2005a;

2. BARKER (1983) TYPOLOGY OF 'POLICE OCCUPATIONAL DEVIANCE'

CORRUPTION (INVOLVES A MATERIAL REWARD OR GAIN)	MISCONDUCT (NO MATERIAL REWARD OR GAIN)
Corruption of authority	Police perjury
Opportunistic thefts	Police brutality
Shakedowns	Sex on duty
Protection of illegal activities	Drinking on duty
Traffic fix	Sleeping on duty
Misdemeanour fix	Other violations
Kickbacks	
Felony fix	
Direct criminal activities	
Internal payoffs	

Source: T. Barker, 'Rookie Police Officers' Perceptions of Police Occupational Deviance' in Police Studies, 6 (1983) p.31.

2005b; 2009; Kos 2008; Pyman et al 2011; Punch 2003), and are broadly summarised by Drago Kos (2008):

> "There are several factors which make corruption in the police so difficult to fight: a high degree of discretionary powers, a lack of trustworthy witnesses on the victim's side, the so-called 'blue wall' or 'code of silence' among police officers and the hidden nature of corruption in general".

The 'hidden nature' problem with studying police anti-corruption arrangements in isolation is described by Ivković, who highlights the absence of incentives for either a citizen or a police officer to report a corrupt transaction, for the punitive consequences which would occur to both parties (1998: 599). Further to this, it is thought that dissemination of corruption information will be intercepted by a variety of significant individuals and agencies in a police service:
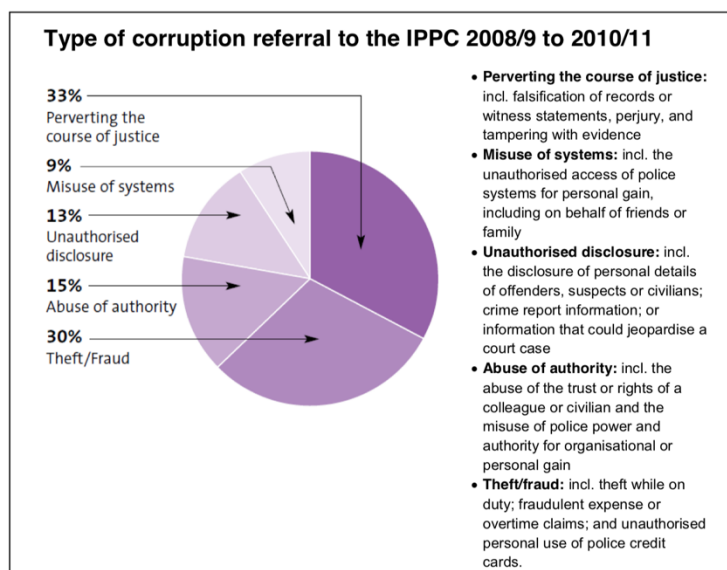
> "Obtaining information about corruption or gaining access to study corruption in an agency will likely be burdened with serious obstacles imposed by a variety of key players-the police officers, union, 17 chief, 8 supervisors-whose agendas, although dissimilar in many aspects and motivated by different incentives, may converge in pursuit of the same specific common goal: disseminating as little information about corruption as possible and, generally, keeping the lid on the existing corrupt activities within the agency" (Ivković 1998: 596-597).

The result of this commitment problem to the reporting of corruption on behalf of all parties involved within the transaction is that corruption reporting remains significantly hidden. This means that a large degree of academic literature is concerned more with the study of complaints and investigations of police use of force and other misconduct such as abusive or discriminatory language/behaviours (Herzog 2002; Prenzler et al 2013; McElvain & Kposowa 2004; Dugan & Breda 1991).[1] Looking

Type of corruption referral to the IPPC 2008/9 to 2010/11

- 33% Perverting the course of justice
- 9% Misuse of systems
- 13% Unauthorised disclosure
- 15% Abuse of authority
- 30% Theft/Fraud

- **Perverting the course of justice:** incl. falsification of records or witness statements, perjury, and tampering with evidence
- **Misuse of systems:** incl. the unauthorised access of police systems for personal gain, including on behalf of friends or family
- **Unauthorised disclosure:** incl. the disclosure of personal details of offenders, suspects or civilians; crime report information; or information that could jeopardise a court case
- **Abuse of authority:** incl. the abuse of the trust or rights of a colleague or civilian and the misuse of police power and authority for organisational or personal gain
- **Theft/fraud:** incl. theft while on duty; fraudulent expense or overtime claims; and unauthorised personal use of police credit cards.

specifically at the subject of corruption, Fig.2 provided by Newburn (2015: 14) offers a breakdown of the proportions of corrupt behaviour referrals in the UK to the Independent Police Complaints Commission (replaced by the Independent Office for Police Conduct), which provides some insight amongst the complexity at least, into the current trends of police corruption.

One of the interesting considerations to come out of the literature into police corruption and misconduct is the weighting of objectives which inform an integrity maximizing strategy in law enforcement. Overall, and as is reflected in all of the discussed frameworks for Internal Affairs, suggested is the importance of not only reducing the prevalence of corruption within a police organization, but emphasis on doing this in a way commensurate with the objective of maximizing and upholding public confidence in the police service to exercise their role as legitimate law enforcement authority (HMIC 2015; Spindler 2018; Newburn 2015; Cabral & Lazzarini 2014). This purpose of the internal control system is summarized by Baramspahič & Muk:

> *"A well-structured internal control system may help in detecting and preventing corruption and unlawful behaviour among police officers. The goal of the control is to ensure that the police service operates in line with its purpose, and that its work results in improved reputation of the police and more efficient and responsible officers"* (2015: 7).[2]

Of course, while these dual objectives can be mutually reinforced by strategies emphasising integrity measures, as is the case in many law enforcement systems, through training, recruitment, codes of conduct, and through these systems of accountability (Kos 2008; HMIC 2015), they raise questions whether important trade-offs must be made in the pursuit of one over the other. Primarily, this concerns the importance of professional expertise to investigations into officer corruption, which regularly necessitates employment of seconded police officers in professional standards, regardless of the particular arrangement (Cabral & Lazzarini 2014; Murphy & McKenna

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[1] On the general subject of breaches of conduct within police services, the 2015 audit by HMIC provides a breakdown of the proportions of reported breaches in internally raised misconduct reports (HMIC 2015; Pyman 2018: 14).

[2] Efficient can also mean enabling police to conduct their operations in everyday criminal investigations with flexibility, and as such 'efficiency' may also be argued to carry a necessity of ignoring certain codes of conduct in the pursuit of the greater priorities of police work. However, this will only cover a small range of acts of misconduct (Newburn 2015).

2014; Herzog 2002). This, however, is where it is briefly useful to introduce alternate literature from accounts of police corruption from different countries which may hold different attitudes to both policing and corruption (Ivković 2005b; Mungiu-Pippidi 2011). In circumstances where accountability of a police service to civilians is low, as in more authoritarian settings, it is evident that the objective of public confidence is of low importance, as accountability is of a top-down, from government to police service, formation as opposed to bottom-up (civilian conferral of legitimacy). Effectively, the promise of an anti-corruption strategy is threatened by the privatization of a police service or public institutions (Mungiu-Pippidi 2011) by country leadership apparatus, as has been documented in both Nigeria (Agbiboa 2015) and Zimbabwe (Mugari & Olutola 2017). Such a context has also been considered present in much of Central and Eastern Europe, whose use of *"serving the rulers of the day rather than enforcing the rule of law"* is connected to the lack of sophisticated anti-corruption methods (Kos 2008: 52). There is also evidence that the pressure felt by police services is different according to cultural context/environment, and the emphasis which is placed on these competing objectives. Greater prominence in many organizational cultures of reference to a department's effectiveness in upholding the rule of law between its citizens than being seen to be doing everything possible to ensure officer integrity, is an important factor in determining the attention to internal corruption given by law enforcement or other government agencies. This has been thought the case in both Israel (Jonathan-Zamir & Harpaz 2014) and Mexico (Sabet 2012), where officers and citizens surveyed in both countries appeared to place greater relative value on 'effective' rather than necessarily 'professional' policing, which itself focused more on providing security and keeping the peace than consistent honest practice.

3. Review of procedural models of Internal Police Control

Robust internal supervision and accountability, capable of holding officers and staff at all levels to account, is considered essential to any police anti-corruption strategy (Newburn 2015: 34). In the predominant literature and findings from major commissions of inquiry, such as Fitzgerald in Queensland, Australia (Prenzler 2011), or the Mollen Commission in New York, failures in the supervision and management of police staff at the levels most proximate to the misconduct, that of the internal department oversight, are highlighted (Newburn 2015: 34). Depending on the relationship of politicians and government leadership to the police, police corruption can be an originating offence facilitating broader political corruption, or an integral aspect of a large-scale corruption enterprise penetrating many institutions (Prenzler 2011; Finnane 1988; Coaldrake & Wanna 1988). There is a large body of literature concerned with constructing procedural and structure templates of the anti-corruption and anti-misconduct proceedings of Professional Standards Units. These models uphold broadly similar criteria of the essential elements of an integrity ensuring and public confidence maximizing process, thus implying common requirements for anti-corruption strategies. It may be useful, however, to discuss the variety within these frameworks for categorisations which have been employed. This demonstrates that practice recommendations for police anti-corruption measures are influenced heavily by the departments or police sectors taken for analysis. As such, the stability of anti-corruption frameworks is brought into doubt by the very existence of multiple attempts at categorization.

3.1 Review by the US Department of Justice

This analysis begins with a publication from the US Department of Justice, which provides the most comprehensive breakdown of the procedural response to misconduct by a police officer or support staff. The report was compiled through the collaboration of 12 major city police agencies in the United States, forming the National Internal Affairs Community of Practice Group. The very first

important finding through the collaboration was the great lengths their report went to establishing the limitations of their guidelines, such as divergence in a number of understandings of the investigative and oversight process both in terms of agreeing common definitions between the 12 departments: *"[a] large part of the time on this project was spent trying to agree on the terms common to each agency"* (US Department of Justice 2014: 11). The problem of uniformity is reported in other literature, such as in the differences in national regulations and understandings of corruption crimes (Pyman 2018). The project was also challenged by the discovery that *"profound differences among state and local laws, collective bargaining agreements, and organizational and political cultures are factors in the struggle to reach commonality"* (US Department of Justice 2014: 11). Finally, *"striking differences among the investigative models, processes, and structures among the participating agencies"* had to be harmonized in the creation of their common framework for a best practice guide for internal affairs. This bears both positives and negatives:

i)   Positives in terms of enabling readers and policymakers to accept the report as representing only those elements which could be regarded as relatively common practice among police anti-corruption agencies.

ii)   The fact that the variation or disagreement has been omitted from the report means that a comparison between the precise frameworks and exercise of investigations and complaints handling between departments is concealed.

The report covers the essential stages across the investigation timeline for an internal affairs unit in dealing with either citizen or officer made complaints about the conduct of departmental staff. These stages are categorized as Intake, Classification, Investigation and Adjudication. The specification of conduct with regards to intake clearly reflects the dual objectives of an anti-corruption strategy in the police of sustaining high levels of integrity and also with a focus on improving and upholding public confidence in the trustworthiness of their service. This is achieved by an agency casting a 'widest possible net' in complaint intake, which additional to providing the most easily collectable evidence into officer misconduct, *"as a whole provide the agency with insight as to how it is perceived by the public"* (US Department of Justice 2014: 13). This policy on intake also reflects a broader commitment to making anti-corruption in the police, as in other public services, as proactive as is plausible with the means available. This importance of proactivity is reflected or implicitly accepted in all the analysed frameworks and is discussed in other literature dealing with police corruption more broadly. Newburn, for instance, comments on the importance of anti-corruption measures to be vigilant and proactive not necessarily to actually eliminate corruption outright, but because *"any complacency about its existence or lack of realism about what is necessary to prevent and control such conduct will quite quickly lead to the (re)-emergence of a serious problem"* (2015: 14).[3] The acceptance and vigilance of complaints contributes to this proactivity.

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[3] The significance of the risk of the re-emergence of a serious problem was highlighted by the 1994 Mollen Commission, which also perhaps highlights the importance of using complaints as a means by which the transforming nature or trends of corruption/misconduct are occurring throughout a police service. The Mollen Commission highlighted how the means of corruption can change according to the barriers put in place preventing past activities, and this also justifies the utilisation of a broad definition of the acts which should be considered in a police corruption definition: *"While the systematic and institutionalized bribery schemes that plagued the Department a generation ago no longer exist, the prevalent forms of police corruption today exhibit an even more invidious and violent character: police officers assisting and profiting from drug traffickers, committing larceny, burglary, and robbery, conducting warrantless searches seizures, and committing perjury and falsifying statements, and brutally assaulting citizens. This corruption is characterized by abuse*

One of the interesting contributions made by the report with regard to intake is the importance of auditing or investigating the complaint intake of a professional standards department. Though this function might be considered as promoting the prescribed role of some other independent body to be completed efficiently, the report considers this auditing function to be the competency of an internal department or regional agency. *"As a routine matter, an agency should conduct regular audits to verify that complaints are being taken properly and to ensure that all employees are adhering to agency rules and standards"* (18). Some agencies use video cameras or undercover officers posing as complainants to test the integrity of its processes for the intake of complaints (19). However, reflecting the possible importance of external capacities in offering audit-style control is the observation that it is not uncommon for organizations concerned with civil rights to send individuals posing as complainants to conduct similar tests. Auditing of anti-corruption controls is, for instance, not left to department agencies in England and Wales, and is instead carried out routinely by HMIC (2015).

3.2 Classification of complaints

Where complaints allege some criminal misconduct, these would be treated as a criminal inquiry first and foremost and follow rules of criminal standards of proof for the establishment of guilt or culpability (US Department of Justice 2014: 22; Girodo 1998: 481). Unsurprisingly, this protocol is followed in the investigative process of PSUs in England and Wales (Spindler 2018). Of course, the criminality of a large number of specific misconduct behaviours by police officers is questionable, and as such corruption is often dealt with at the less serious level of administrative inquiry. This is considered to have a broader mandate for investigation and standards of proof, not requiring the meeting of criminal standards. Such inquiries are instead bound by departmental procedures (Girodo 1998: 481). Concerns with classification of inquiry are important in terms of the ability of corruption investigations to be pursued and substantiated, particularly with regard to more serious instances warranting criminal classification. There are a number of dynamics by which classification can affect an inquiry, for which there is not often an obvious solution. In the instance of criminal classifications, the range of investigative measures and evidence permissible for inclusion in the adjudication process is often affected by the criminal classification (Spindler 2018; Girodo 1998). Peter Spindler, head of HMIC's 2015 corruption audit into the anti-corruption measures of police in England and Wales, discussed the limits of the use of 'adverse information' arising from investigations which violate evidence gathering regulations in the process of gathering information on the complaint of misconduct (2018). Though perhaps crucial to the investigation being fully informed, this is not included in the formal investigation proceedings due to the manner in which it is gathered.

3.3 Evidence-gathering standards

Similar implications of regulations over evidence gathering standards are highlighted by Girodo on the slightly separate subject of the use of pre-emptive undercover investigations (1998). These pre-emptive measures might feasibly be used before the opening of a criminal investigation, and should they be plausible and conductible within the bounds of department regulations may improve the ability of a PSU to be proactive. Additionally, it is likely that these measures would be used where there is already sufficient suspicion of criminal level corruption or misconduct. However, Girodo summarises the difficulty in their employment due to a finding of a severe absence of guidelines for

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and extortion, rather than by accommodation - principally through bribery - typical of traditional police corruption" (Ivković 2005b: 549).

establishing where these probes are acceptable (1998). This *"may lead some dedicated IA investigators to stretch the legal and ethical envelopes, and risk going too far with undercover stings"* (479). Furthermore, the elevated standards of proof of a criminal investigation are counterproductive to the aims of stamping out the most significant corrupt behaviours in a police department through the investigative approach. This is where retrospective or parallel administrative inquiry can become a highly effective tool. A final difficulty is that criminal classifications mean that investigating staff must be trained in criminal investigations, and as a result these investigations cannot help but be overseen by fellow officers (Spindler 2018), something which is criticized in a number of IAU literature in negatively affecting integrity (Herzog 2002; Murphy & McKenna 2014). Overall, there are some questions around the complications in dealing with police misconduct as a criminal matter. Such an establishment of criminal suspicion, however, does not preclude the employment of either parallel or retrospective administrative inquiry into the complaint or suspicion of misconduct (US Department of Justice). In terms of whether it is better to hold administrative inquiries either in abeyance or consecutive with a criminal investigation, it is thought that delaying them until the conclusion of the more serious inquiry is preferable for the unimpeded progress of the criminal case, and is challenging to perform due to the necessity of keeping investigations separate (particularly because of the evidence requirements/discrepancies described) (2014: 24-25). However, this can also prejudice the administrative investigation due to the time delay in evidence gathering and adjudication. As a result, it is left unclear as to the best practice for proceeding where there is a perceived necessity for both criminal and administrative measures. Perhaps contradicting to the aims of police anti-corruption in minimising the disclosure of the extent of corruption within departments (Ivković 1998), and maximising public confidence (Spindler 2018), Bajramspahić & Muk (2015) contend that internal investigative units better strengthen their legitimacy if they are concentrated on criminal investigations as opposed to administrative investigations *("defined by work contracts and codes of conduct")*(8). This may be due to the increased public scrutiny over criminal investigations within police departments but proposes questions of competing logics over the referral of corruption issues to investigative units to be treated as criminal investigations.

3.4 Investigations

With regard to the actual investigation stage of a complaint against professional standards, the Department of Justice report reflects the concerns of the proceeding models of anti-corruption model categorization to be discussed. First and foremost, the guidelines state that all agencies should ideally have a policy to *"address any instance where Internal Affairs confronts a conflict of interest or believes that it cannot conduct an objective and unbiased investigation"*. Logically, IAUs must have a capacity to possess such a policy which is usually contingent on the integration of some external oversight agency separate from the police department. Kutnjak Ivkovic argues that the current oversight of police corruption appears to be *"assigned to institutions that are temporary (e.g. independent commissions) or sporadic (e.g. the media) … or institutions that at best have the authority to examine only some elements of the agency's control system"* (2005a: 157). The incapacity of an internal professional standards department to address instances where there is a conflict of interest sufficiently threatens the ability of such anti-corruption arrangements to be capable in all situations. The remit of an IAU is considered extremely broad in the report as to cover almost any misconduct, and certainly all serious administrative investigations. The exception is with misconduct allegations against the agency head, who is considered to act as the final decision maker in investigations following recommendations of, usually, decisions over culpability of an officer, but occasionally also punitive actions, from the IAU. In instances where an agency head is suspected of

misconduct, an independent investigation from an external agency is required. The report also covers investigations which an IAU should relegate to management at the commanding officer or unit level within a police department. However, behaviours associated with corruption are still considered of sufficiently significant importance to manage through Internal Affairs or higher up the command chain.

The guidelines provided with regard to investigation, though not fully fleshed out in this review, do have important complications which are made evident in differing literature. These potentially reflect that the guidelines, as most public inquiries and academic research are also concerned with (see Terrill & Ingram 2016), came from the collaboration of large, major city police departments. This means that important considerations for smaller or less well-staffed departments without a fully competent external integrity management mechanisms are to an extent ignored.

The hierarchical/independent agency management of corruption similarly has to be conceptualised sensibly depending on the needs of a police service. This is discussed by Filstad & Gottschalk (2011) with regard to the Norwegian Bureau for the Investigation of Police Affairs. Essential considerations include the strength of the police solidarity culture, which either enables or constrains the secondment of retired officers as opposed to civilian personnel; the staffing and resource requirements of the agency; and whether national-level corruption management is superior or suited to the task than regionalised or departmentalised strategies.

The foremost appropriate alternative framework is the categorization of investigation types offered by Lamboo (2010). This literature is useful as it builds upon the administrative and criminal investigations with the inclusion of other procedures. Administrative and criminal investigations are conflated under 'formal investigation', and other avenues of anti-corruption practice are introduced in the form of 'informal procedure', which focuses on creating some form of agreement between the parties involved (i.e. complainant and officer), rather than official sanction. There is also the act of managerial resolution, focusing on other non-disciplinary strategies such as guidance and remedial teaching directed exclusively at the offending officer. In an interview with Peter Spindler, the former leader of HMIC audits stressed the requirement of a police department to reach a 'critical mass' in order for the within-agency control model to function properly (2018). Furthermore, even in large departments but particularly so in smaller agencies, it is problematic to balance the priorities of routine investigations of serious crimes with assigning the best investigators

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Key Points:

Variability in definitions of corruption/misconduct, organisational/department cultures, and statutory regulations produces significant variation in anti-corruption exercise even across county and state police departments.

Audits of intake form an integral part of the integrity procedures of an IAU or external body.

Classification of complaints and warranted investigation is important and influential in the manner of investigation, standards of proof, and admissible evidence to a case.

Key to effective investigation is the instrumental capacity of an agency to carry out the Professional Standards function, or to be able to delegate this if impartiality is not possible through internal management.

Internal Affairs should report directly to the Agency Head to reduce risks of interference and to ensure that decisions are made by or in conjunction with agency head on serious matters of misconduct.

(Spindler 2018). Guidelines are available for Internal Affairs for smaller police departments which may suffer from limits on their available instruments, or on their ability to conduct unbiased investigations within the department, where investigators and suspected officers may be close colleagues (Thurmauer; Kelly 2003).

Following the completion of the criminal and/or administrative investigation, the restorative method required must be decided following decision as to whether the complaint should be i) sustained/founded, ii) not sustained/not resolved, iii) exonerated, or iv) unfounded (US Department of Justice 2014: 50). It is proposed that the head of Internal Affairs should report within the police department to the department head (51), and therefore decision on the course of action for cases investigated by Professional Standards should be made by the department head, based on the findings of the internal investigation (US Department of Justice 2014; Kelly 2003; HMIC 2015).

3.5 Inequality/discrimination in corruption investigations

Consistently reported is the demographics of both complainants and recipient officers of complaints about their misconduct. The main issues relevant to the effectiveness of IAUs/PSUs are that:

> Black/minority ethnic individuals make up a majority of complainants (Liederbach et al 2007; Terrill & Ingram 2016). But these individuals are significantly less likely to have their complaints sustained than white complainants in evidence from the US and UK.

> Black/minority ethnic police staff (Terrill & Ingram 2016; HMIC 2015) are far more likely to have complaints made against them sustained, disproportionately to the volume of complaints received against minority staff.

> Female officers are also far more likely to be the subject of sustained investigations, similarly to BME, despite complaints against female officers for misconduct being received disproportionately low compared to the composition of a police agency. (Lierderbach et al 2007; Terrill & Ingram 2016; Martin 1980; Porter & Prenzler 2017).

White male/majority officers are more likely to be treated with informal consultation and punishment as this is the preferred method by senior ranking police staff and there is not the equal pressure on dealing with these individuals more formally. There is, therefore, significance to the possibilities and regularity of application of *informal procedure* and *managerial resolution* in the management of corruption within a department (Lamboo 2010: 615). Research conducted by Harris & Worden (2014) suggests that officers react badly to formal investigation and sanctions below dismissal/criminal charge, believing the system/organisation is 'rigged' against them, rather than actually helping to change behaviour of problem officers. Informal procedure, and in particular managerial solution and referral for guidance and remedial training are most effective in changing behaviour.

4. How the models are implemented

Next, it is important to consider how literature has constructed different models of the relationship between internal and external agencies in the exercise of this process. This will demonstrate that the exercise is highly variable, and this suggests that how these differing models affect outcomes in curbing corruption is worthy of more scrutiny.

One fundamental concern of previous police anti-corruption literature has been the preference for some form of external oversight, which is considered to foster superior accountability controls and improved public confidence comparatively to internally managed, less transparent mechanisms, or

of which little is known (Newburn 2015; Pyman 2018; Greene 2007). Though most prescriptive guidelines suggest the strengthening of internal functions alongside integration of some independent review or auditing body (HMIC 2015; US Department of Justice 2014; Newburn 2015; Pyman 2018; Spindler 2018), other scholars reason that the importance of conference of authority onto police by their citizen communities means that independent review of police conduct is essential (Greene 2007). In the most predominantly surveyed police sectors such as in Australia and the UK, there is at least some degree of civilian or external oversight included as part of the Professional Standards function of each department. Studies have been conducted which summarise the makeup of these arrangements, which are highly differential across departments surveyed, and the relative effectiveness of each of these frameworks has been a point of academic attention.

4.1 Effectiveness of civilian component in eight US city police departments

In an examination of eight major city US police departments, Terrill and Ingram (2016) categorise each department by the method of integration of civilian (non-law enforcement staff) oversight within department anti-corruption controls. They based their evaluation of the effectiveness of each model on the performance criteria which is reflected in other literature. Firstly, the capacity of oversight agencies to punish deviants where appropriate (Cabral & Lazzarini 2014: 799). Secondly, the promise of investigations to produce sustained findings (Terrill & Ingram 2016: 152), as it is presumed that only a fraction of legitimate complaints are pursued fully, meaning a number of legitimate inquiries are prematurely discontinued.[4] Terrill and Ingram categorized their eight departments into 5 separate models:

1. *IA Only* – departments that used only an Internal Affairs Department of Professional Standards Unit. Examples: **Fort Wayne Police Department** and **Columbus Police Department**.
2. *IA/Command* – departments which had complaints investigated by either IA or agency command. **Examples: Colorado Springs Police Department**.
3. IA/Command with Citizen Review – departments that had IA or command investigations along with an added citizen review component. **Examples: St. Petersburg Police Department, Knoxville Police Department** and **Charlotte-Mecklenburg Police Department**.
4. *IA/Command with Independent Intake* – departments that had IA or command investigations along with an independent review intake office. **Examples: Portland Police Bureau**.
5. *IA with Independent Investigation* – departments that had IA along with an independent review office which also conducts investigations. **Examples: Albuquerque Police Department.**

The analysis uncovered some key findings in the differences between the performance outcomes across departments and models. Overwhelmingly, while the percentage of all allegations across the departments which were sustained was extremely low (10.9% of 5,563 allegations), it was found that the IA/Command/Citizen Review Model brought the highest number of sustained complaints, particularly the St Petersburg PD with 29.4% of received complaints sustained. Both other IA/Command departments with Citizen Review incorporated sustained complaints at a higher

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[4] HMIC's 2015 findings validate that the most common outcome for breach of conduct investigations is 'no further action' (Pyman 2018: 14). It is, however, still extremely difficult to come close to certainty around estimates around how many investigations should indeed warrant further action.

proportion than the mean sustained rate (14.4% in Knoxville and 13.2% in Charlotte-Mecklenburg). Most interestingly, the least effective department was that which integrated the civilian component by way of controlling the intake of complaints through independent citizen agency (2.2%). Fundamentally, the independent intake control model should most closely approximate the maximal intake procedure envisaged by the US Department of Justice guidelines, which appears so. The high volume of intake, furthermore, may account for the low proportion of sustained findings, rather than a lack of thorough and fair investigation, and so the complaints sustained percentage might be a non-ideal measure of this department's effectiveness. Terrill and Ingram's interpretation tends to refute this assumption of maximal complaint intake to be an essential element of an IA strategy which would bring about tangible positives to its established aims. This instead may suggest that integrating civilian oversight of complaint intake has little impact on the thoroughness of investigations completed by IA, and instead merely has increased the volume of complaints referred. For civilian input to be considered true value added, it should have more influence into the investigative process than merely controlling intake. Positively, civilian intake control may increase the effectiveness of intake audits. Overall, the usefulness of maximal intake, and the proper use of external civilian authority in IA, requires further exploration in how it should be integrated into department anti-corruption. Likewise, it is suggested by the results that too much externalization of corruption controls to civilian investigative power is also not necessarily beneficial to IA performance because of the loss of police-officer specific expertise and department-specific instrumental investigative capability.

4.2 Use of a civilian board for investigations - Israel

In attempting to bring some wider application of the findings of Terrill and Ingram's eight city analysis, literature has been investigated from a small number of different country settings. As the examination suggests that the most superior way to incorporate oversight of IA by independent means is through civilian review of complaint investigations, it is interesting to see how variations which reflect their models perform in different contexts. Studies of the Israeli national police force with the introduction of a civilian complaints board ('Machash') raise interesting questions. The structure reflected components of both the IA/Command/Citizen Review as well as the IA/Independent Investigation models.

Fundamentally, the integration of a civilian board to investigate more serious complaints (with less serious still handled by IA) did not lead to an increase in the number of sustained complaints (Herzog 2002: 129). This was in part due to the opening of a greater number of files as with the civilian intake model outlined by Terrill & Ingram, as *"[t]he declared policy of Machash was to open a formal file and investigate every complaint and suspicion containing any element of information against a police officer"* (127). However, the most significant aspect was the way in which civilian agency review of investigations did not have a similar impact to that in the St Petersburg PD. The regulation which codified the civilian input into these investigations was the rule preventing files to be closed until an attorney from the civilian board examines the material connected with the case. This measure, unfortunately, was ineffective in actually guaranteeing civilian review or even formal investigation, with a large number of complaint files closed before investigation due to a *"lack of public interest"* (127). It is therefore important to consider more specifically the way in which civilian oversight can be guaranteed in contexts where there is a question over the public interest in managing police conduct due to the lower premiums placed on integrity and professionalism than general maintenance of security and order. This is the case in Israel, where perceptions of legitimacy are emphasised more with reference to efficiency over integrity, and the legitimacy of an efficient

and respectable police service is actually accepted as conveying certain benefits to police officers (Jonathan-Zamir & Harpaz 2014).

The Machash case represents an extreme of another problem faced in IA and questions over impartiality and ensuring public confidence, in that every investigator working on the civilian board were former police officers (Herzog 2002: 122). These officers serve as civilian investigators on the basis of proven investigative expertise (122). However, this dampened the impact of opening up anti-corruption in the Israeli police forces to civilian oversight, as these officers will likely have stayed to some degree loyal to the values observed by Jonathan-Zamir & Harpaz which trivialize the importance of transparency (2014). It is also likely that the envisaged reduction of the effects of organizational loyalty commonly cited as a hindrance to internal misconduct investigations, fail to be mitigated by the inclusion of such a high volume of former officers (Ivković 1998; Newburn 2015; HMIC 2015).[5] Even without discussion of the applicability of the different models of civilian input into police anti-corruption to different national or cultural contexts, further consideration is needed into the ideal relationship between internal and external components of oversight.

For comparison of IA models, and to demonstrate the significant variation in degrees of independence and precise divisions of labour between external and internal investigative/oversight bodies, this review will discuss an additional categorization framework for Internal Affairs. Though with similarities in its categories, Murphy and McKenna (2014) propose the following framework for differentiation:

1. *Police Investigating Police (Inside)* – this represents any investigative model where the police themselves are fully responsible for the intake, investigation, adjudication and administration of public complaints with no external civilian review or oversight.
2. *Police Investigating Police (Outside)* – any investigative model where police officers from another department or service are invited to investigate a police service. This model of investigation is also not subject to external civilian review and oversight.
3. *Police Investigating Police + Civilian Review/Monitoring* - where the police continue to be responsible for the intake, investigation, adjudication and administration of public complaints. There are varying degrees of civilian oversight and involvement in the PIP process, including: a) civilian review/post-investigation, and b) civilian observation and monitoring of PIP investigations.
4. *Police/Civilian Investigation Hybrid + Civilian Review* – this represents any model where the police are engaged in some form of collaboration, cooperation or coordination of the actual investigation of public complaints. There may also be aspects where civilians are involved with the intact, adjudication and administration of public complaints.
5. *Civilians Investigating Police + Civilian Review* – this represents any model where the police are excluded or removed from the process of investigating public complaints. There may be some form of police involvement in the adjudication process associated with these models however the hallmark of an "independent" system will be that civilian personnel are responsible for the conduct and conclusion of the actual investigation process. This model may also include some form of civilian review of any follow-up actions taken by the police

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[5] As summarised by Murphy and McKenna (2014): "*The introduction of police culture and police values through the ongoing involvement of retired or seconded police may inhibit the development of a new civilian organizational culture*".

service with respect to sanctions, training, education, and other organizational processes designed to address issues resulting from these investigations.

The typology clearly follows a similar continuum running from internal (PIP Inside) to external (CIP + Civilian Review). However, there are key additional variables not accounted for within Terrill and Ingram's framework, which offer considerations through which their findings and case selection could be further scrutinized. For instance, internal investigation of corruption is divided into both within department and across department investigations, and the incorporation of civilian review is categorized into either post-investigation or monitoring. These are both also components of a professional standards framework which need investigation through case studies which might propose which arrangement works best. Additionally, the authors appear to weigh the benefits of the civilian investigation model using some differing criteria to others, suggesting that this model reflects a proportionately greater concern for public validation of police powers than thoroughness of investigation and maximizing investigative capability. Others are still proportionately weighted more in favour of being more able to assess complaints as the main objective. This is perhaps because of example selection, using the case of the Ombudsman in Northern Ireland and their justification for the entirely independent model: to *"provide police with a stronger public validation of their position"*, which the authors might have considered essential considering the historical/political context of the environment to necessitate a minimalist approach to police powers (Murphy & McKenna 2014). The degree of need for capacity/expertise for misconduct investigations may be far reduced compared to the need for public accountability than is required in other contexts to serve public confidence as well as halting corruption. Nonetheless, it is a pitfall of comparative research between oversight models that the possible differentiation of the emphasis on certain objectives, particularly between instrumental capacity and public perceptions of transparency, are not considered when making comparisons of performance. In Terrill and Ingram's case, it is possible that the civilian investigation model drew the greatest public confidence and may therefore be seen as the most effective framework according to a different objective, but this was unfortunately not examined.

4.3. Internal IAU model – Republic of Zimbabwe

Police corruption is thought to be a rampant problem in the Republic of Zimbabwe, with the police perceived as the country's most corrupt institution, with surveys recording a prevalence of up to 25% of respondents having paid a bribe to obtain a service or concession from police (GAN Business Anti-Corruption Portal 2016). The Z.R.P is a centrally controlled police organisation which is headquartered in Harare, the country's capital city. It is headed by a Commissioner General of Police. The internal affairs model is supported by the legal and regulatory framework of The Police Act (Chapter 11:10), which provides for the internal processes of handling police misconduct. The results of Mugari and Olutola's (2017) study into the ZRP's internal accountability found several strengths and weaknesses which were related to the internalization of corruption management. Firstly, a strength of the internal control model was found to be the promptness of investigations (54). This could be considered a result of the guaranteed expertise and access to relevant evidence and evidence gathering material and data available to an agency when it exists as part of the police department and is staffed by serving police officers. This could, also, be a strategy to lower the chances of public accusations to be doing nothing about corruption, and the investigation serves a superficial purpose.

However, the ZRP internal model also exhibits issues signalling the need for external accountability. Firstly, a result of the internally managed accountability process is that it is susceptible to the

solidarity between police officers which harms the prospects of indictment or punishment (Murphy & McKenna 2014; Newburn 2015; Moran 2005; Kos 2008; Ivković 2005a; 2009). Mugari and Olutola find in support of this that a majority of surveyed officer respondents would be unwilling to indict a fellow officer in an investigation (2017: 56). Interestingly, it appeared that willingness to testify was strongly associated with rank, with lower ranking officers (Constable/Sergeant) much more likely to be unwilling to testify than more senior officers, perhaps because of increased threat of backlash (58). This could also be due to their positions more often as active field officers, which carries with it increased proximity to and opportunity for corruption (e.g. Carter 1990 – drugs), so these officers may fear their own investigation and want to protect themselves from indictment by others. The final criticism of the ZRP process was the absence of public scrutiny or the disclosure of investigation outcomes to the public (Mugari & Olutola 2017: 54-55). This not only embodies the issue with internal control, but also demonstrates the importance of public confidence as an incentive for opening up police misconduct oversight, something which is absent in certain states.

Overall, the case of Zimbabwe presents an indictment of the PIP model, consistent with the findings of past corruption scandals and corruption management in more researched countries such as the US (Jiao 2010) and Australia (Prenzler 2011), whilst also outlining some key socio-political factors which must occur for externalization of anti-corruption to occur. Even more consistent with the critical problems of the Internal PIP model is the lack of outside awareness or understanding of the internal accountability process in the ZRP, either with citizens or external accountability institutions (Mugari & Olutola 2017: 53). This is foremost an issue considered with reference to its detriment to public confidence (Sen 2010). However, it is also consistent with problems in actually producing a tangible reduction in corrupt activity (Newburn 2015: 37). In Zimbabwe, as in other developing world contexts (Agbiboa 2015), it is feasible that the lack of external accountability mechanisms interacts with other corruption risk factors/incentives emphasised as policy concern areas in past corruption audits (HMIC 2015). These factors include poor working conditions, low wages, and poor resources and training (GAN Business Anti-Corruption Portal 2016), aspects which may be emphasised in states such with less developed public sectors. Furthermore, the case of Zimbabwe highlights the problems of differing legal and statutory contexts which were recorded in the US Department of Justice's 12 city collaborative report (2014: 11). The Public Order and Security Act (POSA), for instance, allows for the imposition of arbitrary curfews by the police, forbids criticism of the president and restricts other active and professional nongovernmental organisations (GAN Business Anti-Corruption Portal 2016). The latter two factors restrict aspects which might be considered integral to providing some increased accountability pressures onto an otherwise insular and regime-focused law enforcement institution. By extension, a stimulating and strengthening effect on internal control mechanisms may occur through these pressures or the increased awareness of their material shortfalls through their monitoring by parliamentary institutions (Bajramspahić & Muk 2015: 7). In support of the importance of greater freedom in these aspects, it has been found that the existence of a free press is important and influential in the decentralisation of anti-corruption and increasing the strength of public accountability pressures (Lessman & Markwardt 2010).[6]

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[6] Both Zimbabwe and Israel's experiences with police accountability and corruption control are examples of the difficulty of 'institution transplants' (Mungiu-Pippidi 2011: 48-57). This is a concept which is useful in theorising the overall difficulty in proposing a common framework for anti-corruption agencies (Mungiu-Pippidi 2011). Both cases demonstrate separately that i) institutional transplants are dependent on common societal and organisational perspectives with those where the institutions have been successful, which was demonstrated to not be the case in Israel. ii) there are essential elements of a

4.4. Police/Civilian Investigation Hybrid – Slovenia

The case of the Republic of Slovenia is interesting because it proposes questions for the adequate empowerment of both independent and internal bodies.[7] Such questioning occurs in two interesting ways. Firstly, the utility of the introduction of external parliamentary and independent supervision is questioned where, as in Slovenia, the power of these bodies is limited, or the division of anti-corruption labour remains disproportionately in favour of the police specialised units under the direction of the Directorate General and Ministry of Interior (Baramspahić & Muk 2015: 13). A second account is questioning of the actual potential of anti-corruption institutions to be effective in the police through proactive oversight and investigation in comparison with other priorities which form part of an anti-corruption strategy (Lobnikar & Meško 2015). Academic attention on police corruption in Slovenia, who are moderately ranked by corruption perception indices such as the CPI and are the least corrupt state of Eastern Europe (Baramspahić & Muk 2015: 13), appears to stress far more the importance of police organisational culture and officer perceptions of integrity in reducing police corruption, than any potential impact of integrity agency reform (Kos 2008; Lobnikar & Meško 2015). Such findings from Slovenia may be considered supporting of those from Israel, where similarly the introduction of civilian review and investigation powers had little effect, and it was also found that police placed lesser value on achieving public confidence through integrity than through law enforcement (Jonathan-Zamir & Harpaz 2014). The importance of organisational norms is not a new contribution to the concerns of police corruption literature, present in a number of practice guidelines and recommendations (HMIC 2015; Newburn 2015). However, police corruption research in Slovenia suggests that the importance of investigatory/oversight model is of lesser importance than broad fostering of proper organisational integrity through other methods (Kos 2008; Lobnikar & Meško 2015). Kos (2008: 52) identifies the causes of Slovenian police corruption, as he perceives to hold true in all national law enforcement institutions, to occur in four areas which must be approached commensurately in any anti-corruption strategy:

- Recruitment, training and promotion.
- Resources (e.g. pay and equipment).
- Systems of accountability within police units.
- Cultural traditions.

Kos addresses systems of accountability, however within his analysis is an evident acceptance of the ineffectiveness of external auditing and investigative agents, judging accountability to be determined by the degree to which officer misconduct is sanctioned or punished, and this can only be properly assured through complementarity within all four identified areas which affect anti-corruption (2008: 54). Slovenian police corruption is characterised, expectantly with low external accountability, by high levels of misconduct/organised corruption by senior ranking officers (54). However, high levels of corruption are not reflected amongst lower ranking officers. This is additionally something which is inconsistent with the general trend of evidence of police corruption which suggests that lesser ranked officers encompass a disproportionate percentage of complaints

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social context which must be in place before such an institution transplant can be feasible. Chapter from Mungiu-Pippidi (Norad) in Annex for reference.

[7] Baramspahić & Muk (2015) provides a breakdown of a more ideally empowered external institution combating police corruption (Belgium). Two oversight institutions with separate and overlapping competencies nationally operate in cooperation with local station IAUs which also have a high scope of competency, so may hold suitable additional comparative value (hence their selection with Slovenia by the authors).

and sustained investigations received and conducted by PSUs (Liederbach et al 2007). However, this differentiation in the tendency of lower and higher ranked officers toward integrity/corruption could be explainable through basic deterrence considerations. Higher ranking officers, for instance, may be less likely to be concerned with the threat of sanction, whereas more junior officers would be understandably more threatened by enforcement measures (Pogarsky & Piquero 2004). Such deterrence, furthermore, is less affected by the *severity* of sanctions, which may be higher for a senior officer, than it is by the *certainty* of sanction, which would be higher for junior personnel, which again supports the apparent perceived impunity of the senior Slovenian police (381).The Slovenian experience with higher ranking officer corruption is supportive of the US Department of Justice collaborative guidelines which recommend the capacity of any internal corruption management agency to be able to refer their investigations to alternate agencies to avoid bias or restriction in investigations of senior officers (US Department of Justice 2014: 27).

The most important aspect of reducing corruption in Slovenia was not considered to be rooted in problems with institutional accountability, nor in resources or equipment - *"equipped according to the highest European standards"* (Kos 2008: 54), nor in low wages or training/recruitment. Lobnikar & Meško, instead, provide an analysis of the role of organisational culture on police corruption in Slovenia, again finding the main issue to be in officer understandings, not this time of public confidence but this time of 'integrity' (2015). The results of this study demonstrate overall a high level of police integrity in Slovenia (350). Yet alongside this finding is a high level of self-reported police integrity connected to the code of silence in the police community, where adherence to officer to officer solidarity is considered a behaviour which is itself a hallmark of integrity (Lobnikar & Meško 2015). As a result, anti-corruption strategies are most likely to be successful if they are directed at changing perceptions and moral beliefs about seriousness of corruptive conducts. Of course, a method of accomplishing this would be elevating the certainty of sanction for certain behaviours through proper enforcement, and the true effectiveness of deterrence is its influence on or mitigation of a complicit or accepting organizational culture.

The selection of Slovenia as a case study may be questioned through its existence as a relative outlier when it comes to police anti-corruption:

> *"It is not easy to fight corruption within police forces. The example of Slovenia, where officially the level of police corruption is still low, shows that it is sometimes impossible to determine the reasons for successes and failures. Everything that could go wrong, went wrong in Slovenian police lately but it is still [a] predominantly ethically oriented force"* (Kos 2008: 57-58).

However, in his summary, Kos proposes much broader application of Slovenian police findings, stating "[t]he majority of unsuccessful strategies can be found in countries suffering from a high degree of corruption where mostly outside factors are the biggest obstacles for success" (2008: 57). Certainly, such explanations from the mid-range country in terms of public sector corruption may be indicative of the similar dynamics which affect police corruption management in our Israel example. This is in terms of dynamics related to perceptions of integrity and the importance of public confidence. Such dynamics are also similarly reflected in literature on police corruption in Latin America (Sabet 2012). It is also arguably a non-ideal selection in terms of actual hybridity of anti-corruption agencies, with external oversight in existence, but considered of little consequence (Kos 2008; Baramspahić & Muk 2015). However, the impact of increased externalisation is questionable considering the similarities with a case such as Israel, where the 'Machash' Civilian Board was unsuccessful in improving the proportion of sustained misconduct investigations and given what are the main organisational/officer perception problems contributing to police corruption in Slovenia.

Increased powers to external oversight may be necessary to increase punitive capacity against senior officer misconduct.

5. Summary

The analysis began with a discussion of the problem conditions under which a PSU/IAU must be expected to perform its duties of protecting the integrity of police services, in the aim of curbing corruption/misconduct, and through this ensuring that public confidence in a force/department is improved or sustained. There is great diversity in the management process of internal affairs, with variation existing even between departments within the same county or state. This is particularly demonstrated by literature covering various forces in the US.

Multiple typology models have been constructed aiming to describe the degrees and methods of oversight. In their variation, however, there is potential to find shortfalls not just in the explanatory strength of these models, but also in their prescriptive powers. Such shortfalls can be found through discussion of country examples which could be argued to have been subject of institutional transplants (e.g. Israel), or present issues which question the utility of making prescriptions based on preferences for oversight arrangements which may be more conditional on certain facilitating conditions. These conditions chiefly appear to concern the perception held within a police service of the importance of demonstrating integrity, with some country/force contexts marked by disproportionate emphasis on effective law enforcement than transparency for public confidence. Similarly, the interrelation of perceptions of integrity with a police organisational culture, where adherence to codes of silence is considered to embody officer integrity, is sometimes a powerful factor which needs more clarification before effective accountability can be ensured in all contexts.

 It is also clear that beyond requirements of some mitigation of these officer-based dynamics in order to make Professional Standards and its reform more consequential in addressing corruption, more consideration needs to be made to the prospect of transplanting institutions into non-complementary or alike environments. Institution transplants promoting models such as Civilian Review, or the introduction of an auditing agency in contexts of heavily privatised law enforcement, restrictive statutory regulations on other governmental and nongovernmental scrutiny bodies, and low press freedom, requires more thought as to the comprehensiveness of the overall strategy against corruption.

There is also need for more focus on the practice of discriminatory application of the formal procedures of anti-corruption, and the scope that literature on this subject has demonstrated for majority, white-male police staff to escape sustained investigations or formal procedures.

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