



Jamaica Constabulary Force



Anti-Corruption Strategy 2012-2015

JCF Anti-corruption Branch
August 2011

COMMISSIONERS FOREWORD



The senior leadership of the Jamaica Constabulary Force is committed to transforming the organisation into a highly ethical and professional body that its members can be proud of and that the Jamaican society can have confidence and trust in. The community of Jamaica is entitled to high standards of ethics and integrity, and professional behaviour by their police force that is free of corruption and unethical behaviour.

This view was championed in the Anti Corruption Strategy 2010-2012. Much has been done in the fight against corruption; however moving forward will require a consolidation of those strategies into the next phase. This involves all of us, both sworn and non-sworn members working together through a *FORCE WIDE EFFORT* towards achieving the key priorities of the new 2012-2015 Anti-Corruption Strategy.

I am pleased to announce this new strategy which will further develop those initiatives geared to underpin the momentum required to take us forward into 2015.

I have seen improvement where Commanding Officers and other Divisional Managers are being more supportive of the zero tolerance approach against corruption. However, as we move forward, I would like to see more tangible evidence of support from all managers as without this, the changes in belief, behaviour and most importantly, culture which are so greatly needed, will be difficult to achieve. Managers will be called upon to account for their stewardship in management of their staff. They will be required to be more intrusive and intervene much earlier in curbing the behaviour of errant members.

We are now committed to the path against corruption in building a professional and ethical police organisation for the people of Jamaica. Again, I impress upon all members that this commitment requires all our effort and focus, and the need to embrace this strategy.

Owen Ellington, CD, JP, M.Sc., B.Sc.
Commissioner of Police



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ABOUT THE STRATEGY

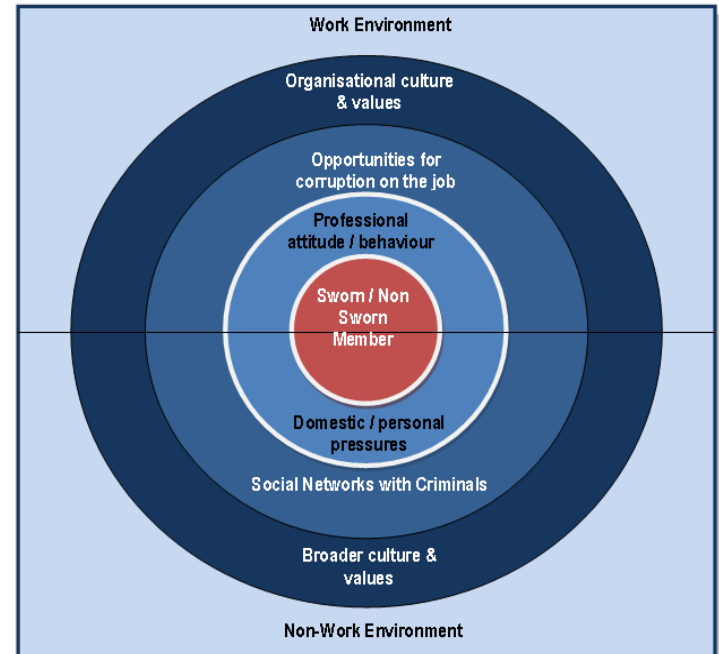
Corruption Environment

Police corruption can lead to devastating and debilitating effects on the strategic and operational objectives of a police organization requiring significant effort to eradicate and reform. Equally important, is that police service delivery may be severely crippled where the public loses confidence and trust in the very organization that is mandated to keep them safe and secure.

Corruption within the policing environment can be characterised into two groups, one that is 'internally-networked' and the other 'individual'.

Internally-networked corruption usually involves specialist or closely formed groups working together and often carry out more organised and entrenched corrupt activities, and the forming of corrupt relationships with criminal or covert human intelligence sources that may lead to corrupt behaviour.

Individual corruption is usually associated with individuals who work in isolation with limited interaction with other officers or peers, and limited supervision or accountability. This corruption will develop through social networks and other associations outside of work and lean heavily towards the leaking of confidential information to criminals regarded as a significant threat to police and intelligence organisations' activities. This is not limited to sworn members but also non-sworn members who are increasingly being placed into sensitive police administrative and operational areas.



Corruption Influences



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Additionally, less serious types of unethical standards and behaviour will be more prolific in comparison to the more serious corruption categories and require a concerted and balanced focus and effort to eradicate. If this type of behaviour is not checked quickly, it will lead to more entrenched corrupt behaviour.

Fertile conditions for corruption within an organisation are typically attributed to:

- ❖ Poor management/supervision.
- ❖ Peer group silence/pressure.
- ❖ No organisational prevention.
- ❖ No fear of detection.
- ❖ Perceived success/rewards.
- ❖ Individual circumstances.

Linkage to Strategic Priorities

The Jamaica Constabulary Force (JCF) has undertaken significant reform in a concerted effort to tackle and dismantle corruption within the rank and file of the JCF and proceed down a path of cultural change.

The Command Group recognises the need for an effective approach to shape, maintain and strengthen a secure, accountable, open and transparent working environment through good governance and resilient management.

Importantly, emphasis will be placed on senior management, middle management and supervisors to demonstrate and ensure systemic employee understanding, confidence, commitment and ownership that will contribute to effective implementation and progress of reform. Preventing corruption and unethical behaviour is not the sole responsibility of management but the entire workforce. Therefore all people must be made aware of the JCF's standards, values and commitment to eradicating corrupt and unethical behaviour on a daily basis through its Ethics and Integrity Policy.

This Anti-Corruption Strategy is in direct response to the Commissioner's Strategic Priority – **'Effective confrontation of corruption among JCF members'** and has strong relationships, through specific work elements with the other Strategic Priorities.



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There are also indirect relationships with the remaining priorities, 'Fear of detection' is likely to improve behavior and professionalism thus assisting to improve crime detection rates and upholding Human Rights. Finally good 'Asset Management and Accountability' must be the cornerstone of the management ethos within JCF; namely:

- ❖ Doing more with less;
- ❖ Exercising good stewardship of resources;
- ❖ Working in partnership with colleagues;
- ❖ Share resources; and
- ❖ Seeking external fiscal support, when appropriate.

STRATEGIC PRIORITIES—COMMISSIONER OF POLICE RELATIONSHIP WITH THE JCF ANTI-CORRUPTION STRATEGY								
Reduction of crime especially murder	Restoration of public safety and confidence	Upholding of Human Rights	Boosting morale and confidence of the JCF members and auxiliaries	Effective confrontation of corruption among JCF members and auxiliaries	Effective internal and external communication	Strengthening administrative and human resource utilisation	Improve management efficiency and resource utilisation	Improve intelligence management delivery of systems
Indirect Link	Direct Link	Direct Link	Direct Link	Direct Link	Direct Link	Indirect Link	Indirect Link	Direct Link



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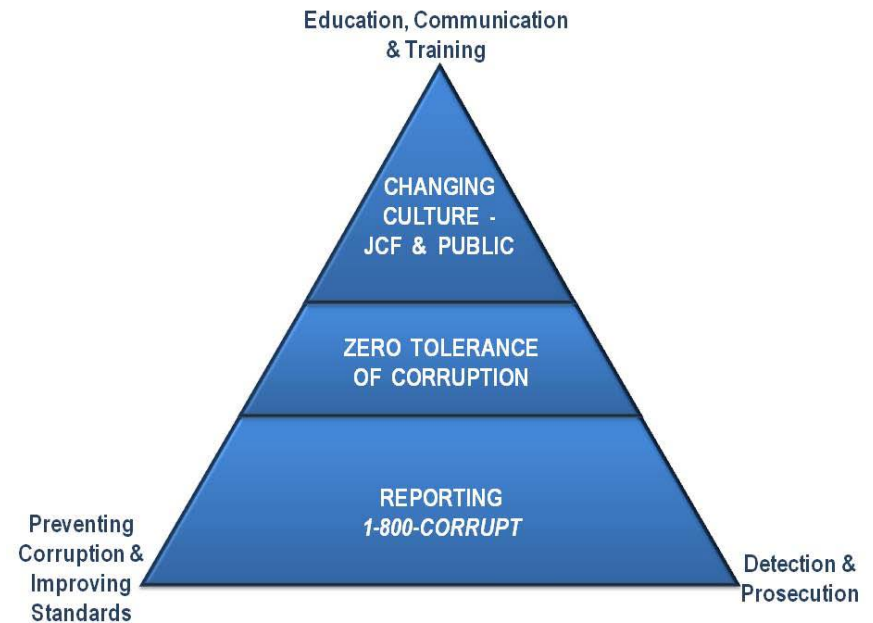
Corruption Strategy Intent

The purpose of the Anti-Corruption Strategy is to not only deal with the responses but also ensure that it is entwined and contributes to the other JCF Strategic Priorities.

This strategy will build on and consolidate the activities and outcomes of previous anti corruption strategies—2007 to 2009 and 2010 to 2012 Strategies. The strategy will have a greater focus on changing the beliefs, behaviour of our members and the culture of the JCF and the public through greater community involvement in preventing and reducing the risks to our staff and community whilst at the same time maintaining the threat and fear of detection. Building and strengthening public confidence and trust through our strategies and commitment to eradicating corrupt behaviours will contribute to a better reputation and image of the JCF.

The work over the next three years will be organized into three strands which is a consolidation of those from 2010-2012. Each strand will have its own prioritized work plan and timescale.

1. Preventing corruption and improving standards
2. Education, communication and training
3. Detection and Prosecution



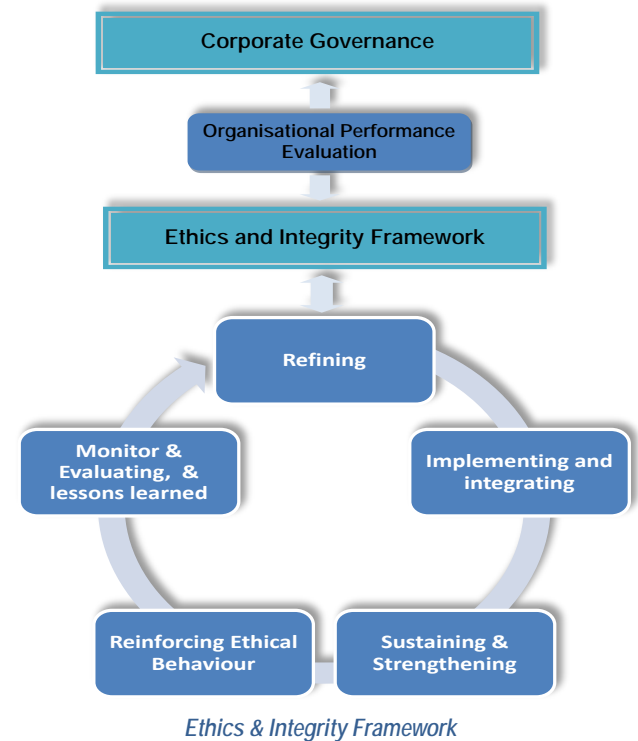
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Ethics and Integrity Framework (EIF)

To maintain reform momentum in the JCF's Anti-Corruption Strategy, emphasis is being placed on the implementation and maintenance of an Ethics and Integrity Framework (EIF) that is owned by the Ethics Committee and will complement current effort and initiatives and contribute to an ethical and professional culture.

The EIF guides the JCF in the implementation of minimum ethics and integrity elements through a cycle of:

- ❖ **Refining.**
The system components of an Ethics system have to be the continuous auditing, reviewing and testing the Ethics system's components to ensure relevance, currency and, fit with the operational environment and are aligned to best practice and strategic direction.
- ❖ **Implementing and integrating.**
Implementation is critical to ensuring that the Ethics system is integrated into all organisational systems and the planning process so that the values and standards espoused by the JCF are inculcated, understood and practiced by personnel.
- ❖ **Sustaining and Strengthening.**
It is important for the JCF to view corporate commitment through the talk and actions of senior managers. Information on the Ethics system, values and standards should be well communicated and understood by JCF personnel and at the same time be readily accessible.
- ❖ **Reinforcing Ethical Behaviour.**
Unethical and corrupt behaviour and poor performance must be dealt with swiftly, fairly and through natural justice if it has to have an impact. Approved informal and formal means of dealing with corruption and misconduct have to be established to demonstrate a commitment to dealing with unethical behaviour. Further, there also has to be mechanisms in place that protect personnel wanting to disclose corrupt or unethical behaviour, and rewards personnel for good conduct.
- ❖ **Monitoring and Evaluation, and Lessons Learned.**
The ethics system has to be continually monitored and evaluated to assess whether it is achieving outcomes and maintaining its relevance. Lessons learned will surface that can be used to refine the system and to ensure that it has the desired impact.



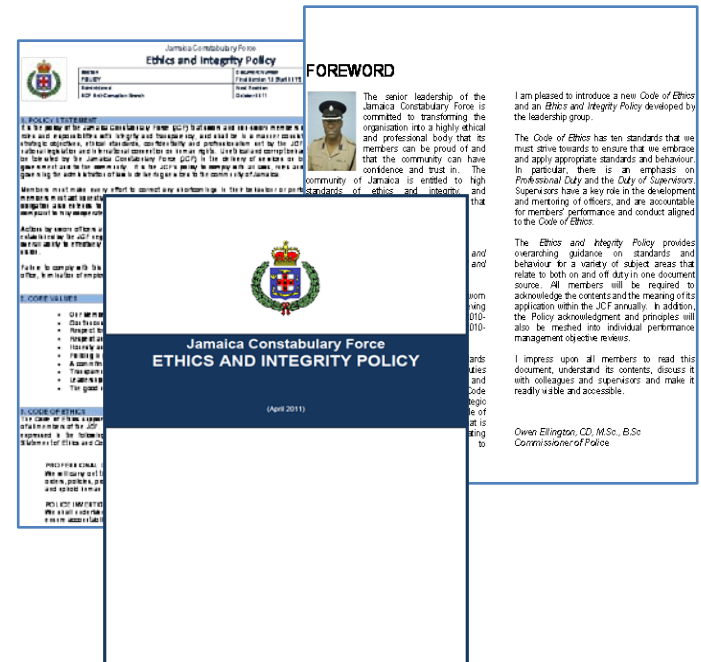
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HOW WE ACHIEVE THE STRATEGY

Objectives of the Strategy

The overall JCF Anti-Corruption Strategy objectives are to:

- Prevent the occurrence of corruption and unethical behaviour within the JCF and culture and organisation through its workforce at all levels of the organisation.
- Actively promote a culture of professionalism, ethics and integrity through policy, guidelines.
- Articulate the Ethics and Integrity Framework into Strategic Priorities to influence robust corruption prevention culture.
- Safeguard and enhance JCF's business reputation and image, build community government confidence domestically and internationally through demonstrated fighting corruption.
- Provide and refine standards and processes to report, investigate and manage to corruption and unethical behaviour.
- Reduce the incidence of unethical behaviour and corruption.



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Guiding Principles

The guiding principles set out our commitment to operate responsibly wherever we work and to engage with the community and our stakeholders to manage the social, environmental and ethical impact of our activities in our work and non-work environments.

The JCF will:

- Through a *FORCE WIDE EFFORT* create a zero tolerance culture towards corruption and unethical behaviour in its organisational practices and service delivery.
- Clearly state corporate standards and principles on corruption prevention through Ethics and Integrity policy.
- Ensure that sworn and non-sworn members shall have responsibility, be committed to maintaining police operations and service delivery and transparency, and is integrated with the Ethics and Integrity Policy.
- Design and strengthen corruption prevention through new and refined policies and systems.
- Work closely with other law enforcement agencies to support anti-corruption initiatives and contribute to building safer and secure communities.
- Maintain organisational ethics, integrity and transparency supported through good governance and guided by the Ethics and Integrity Policy supported through the Ethics and Integrity Framework that includes monitoring, identification and treatment of risks, organisational and individual performance and systems auditing.



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1ST WORK STRAND
Preventing Corruption and Improving Standards

OBJECTIVE:

To bolster effort in the timely removal of corrupt JCF members.

Achieved by:

- Refining personal security vetting through polygraphing processes and procedures that support and emphasise ethical behaviour.
- Developing and refining policies, processes and procedures that emphasise personal support for ethical behaviour and human rights.
- Developing and refining methodology for recognising and dealing with both ethical and unethical behaviour.
- Developing informal ways to reinforce ethical behaviour.
- Developing a 'Wrong Doing' policy, to ensure security and proper follow-up of disclosures (Whistle Blowing).
- Reviewing and refining position descriptions to include ethics and integrity principles.
- Inclusion of ethics and integrity behaviour within a performance management system.
- Continually reviewing the internal Ethics Committee function and relevance, and ensure that the membership has representation from various levels of the organisation and gender balance.
- Develop an Ethics Self-Test aligned to the Codes of Ethics that measures an officer's ability to adhere to the Code of Ethics.

Key Priority Areas

1. Continued use of the cleansing programme focusing on increased vetting and polygraphing.
2. The use of the Ethics Committee to continually test the integrity of our members.

Intended Outcomes

- An organisation that has high standards of ethics and integrity, human rights and professionalism inculcated through policy.
- A fully functioning Ethics Committee that maintains ethical standards relevant to the organisational Code of Ethics and values.
- A resilient Ethic and Integrity System that limits the opportunity for unethical behaviour and corrupt practices to flourish.

2ND WORK STRAND
Education, Communication and Training

OBJECTIVE

To ensure that staff, stakeholders and the public are aware and committed to the fight against corruption.

Key Priority Areas

1. Change the negative perception of the JCF.
2. Internal Educational campaigns
3. Human Resource Development

Achieved by:

- Clear leadership direction and commitment by the Command Group and management to Ethics and Integrity.
- Ensure that ethics and integrity is a strategic imperative and annual measurement—include in Strategic and Business Plans and ensure linkage between systems.
- Develop an Ethics and Integrity assessment to be included in recruitment processes.
- Develop/refine the organisational induction system to include overviews of the Code of Ethics and relevant policies.
- Brief redeployed staff on ethical issues relating to their specific role and responsibilities through induction.
- Display the Ethics and Integrity Policy in all JCF buildings and public access areas.
- Publicise good ethical behaviour internally and externally through an ethics and integrity media liaison officer.
- Develop and refine ethics and integrity training for all levels of the organisation:
- Establish a Key Training Group through representation from each portfolio:
- Provide training and support to managers and supervisors in identifying unethical and ethical behaviour, including risk management and performance management.

Intended Outcomes

- Strategic Human Resource Management elevates ethics and integrity in all HR processes.
- Robust recruitment screening ensuring that only people with an ethically sound background are recruited into the JCF.
- Ethics and Integrity Training inculcated into all JCF training programs and viewed as the benchmark for other agencies.
- Managers and supervisors in performance management.

3RD WORK STRAND Detection and Prosecution

OBJECTIVE

To bolster its anti corruption efforts in bringing corrupt officers to justice.

Achieved by:

- Monitoring and ensuring the right deployment of ACB resources to provide an efficient, effective and economical national service delivery.
- Develop/Refine ethical audit system to frequently conduct risk assessments, test internal controls, and identify limitations, measure the ethical climate and behavioural types.
- Scoping the establishment of a Cyber Crime Unit.
- Strengthening witness protection management through joint approaches with the Justice Protection Unit.
- Strengthening and refining intelligence collection and analysis capacity.

Key Priority Areas

1. Strategic deployment of ACB resources in key areas island wide
2. Increase Intelligence collection capabilities
3. Intelligence sharing and partnership.
4. Witness Management.
5. Case Management Investigation.

Intended Outcomes

- An organisational 'wrong doing' reporting culture is embedded and effective response mechanisms are established.
- Ethical Audit systems are established to support organisational standards.
- Corruption and unethical behaviour are dealt with efficiently and effectively.
- Cross law enforcement agency partnerships are formed to build anti-corruption approaches in tackling and eradicating corrupt activities across government.

RESPONSIBILITIES

The chart below indicates who is accountable for ensuring implementation of the Strategy. In some cases accountability operates at more than one level of the organisation. Everyone is responsible for ensuring the Strategy and that ethics and integrity is inculcated throughout the JCF.

Action	Command Group	ACB	Inspector General	Ethics Committee	Managers	Supervisors	Members
Governance							
Providing demonstrable leadership in the promotion of a corruption resistant culture.	√	√	√	√	√	√	√
Ensure that the Ethics and Integrity Policy and Anti-Corruption Strategy are communicated to all staff.	√	√	√	√	√	√	
Ensuring that associated policies and the Code of Ethics are continuously communicated and promoted.	√	√	√	√	√	√	√
Actively demonstrating and promoting ethical behaviour.	√	√	√	√	√	√	√
Ethics Committee Function.	√		√				
Ethics and Integrity Framework.		√		√			
Planning							
Incorporate corruption prevention and Ethics and Integrity into Strategic planning activities.	√	√		√	√		
Ensure business area employees understand and apply the plan.					√	√	
Clarifying Expectations and Standards							
Ensure that all employees are appropriately inducted.					√	√	
Ensure that employees are aware of the Ethics and Integrity Policy and understand the Code of Ethics.	√	√	√	√	√	√	√
Ensure that staff performance is reviewed.	√				√	√	
Reinforcing staff commitment to their role in reducing corruption and unethical behaviour.	√	√	√	√	√	√	



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JCF Anti-Corruption Strategy 2012 to 2015

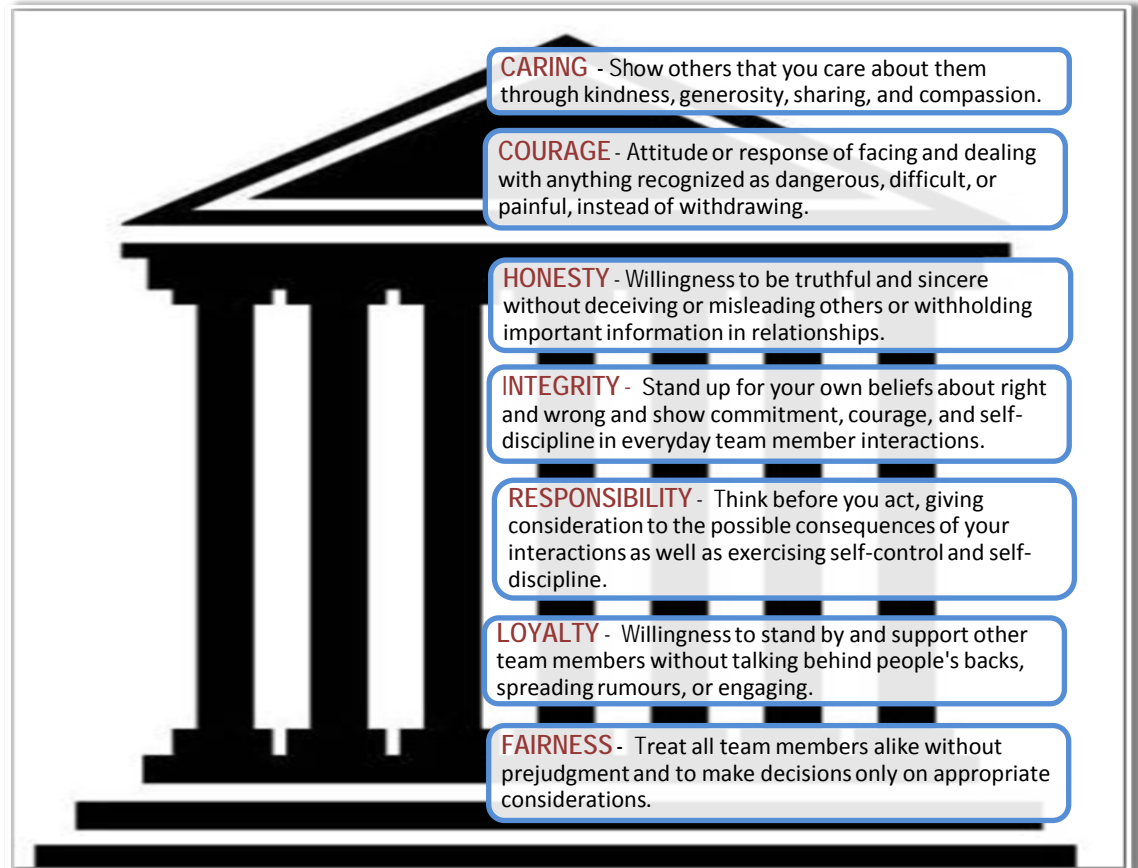
Action	Command Group	ACB	Inspector General	Ethics Committee	Managers	Supervisors	Members
Early Intervention							
Dealing with minor ethical and integrity issues appropriately.		✓	✓	✓	✓	✓	✓
Promotion of a positive attitude in progressing the Anti-Corruption Strategy and Ethics and Integrity Policy.	✓	✓	✓	✓	✓	✓	✓
Ensure that employees receive adequate awareness training.	✓				✓	✓	✓
Reporting and Investigation							
Encourage a culture of reporting fraud and corruption.	✓	✓	✓	✓	✓	✓	✓
Provide an environment in which employees feel confident in reporting suspicious actions or behaviour.	✓	✓	✓	✓	✓	✓	✓
Conduct investigations thoroughly and appropriately.		✓	✓		✓		✓
Monitor and Review							
Assessing policy, systems and controls and their adaptability in current and new structures.	✓	✓	✓	✓	✓	✓	



LEADERSHIP

"I cannot over emphasise how important it is for all members of the JCF through a FORCE WIDE EFFORT to contribute to the new Anti-Corruption Strategy and our Strategic Priorities. In progressing my Strategic Priorities and this Strategy all members need to take a leadership role in ensuring that we meet our own strategic outcomes; to the acceptance and with the support of the Jamaican Public who deserve a Police Force of which they can be justly proud. The values and style adopted by members should focus on taking responsibility for your actions and relationships with others, and at the same time sharing leadership responsibilities. These attributes are best evidenced in the Seven Pillars of Leadership Character."

Owen Ellington, CD, JP, M.Sc., B.Sc.
Commissioner of Police



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