

## **Police Anticorruption Policy - Implementation Plan**

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## 1 Background

Society's trust in the Police is an indispensable resource, and it is imperative that the Police protects it. The Police has been involved in anticorruption activities for a long time, with an objective of promoting good corporate governance. We have been identifying potential corruption risks, managing them in various ways. The Police Anticorruption Policy was published on 1 February 2024.

Towards the end of 2022, the Police outlined the responsible parties of its own anticorruption operations and in the summer of 2023, instituted a working group for the drafting of the Police Anticorruption Policy. The working group included one or several members of each Unit of the National Police Board (Advisory Staff, Administrative Unit, Police Operations Unit, Technology Unit, Internal Supervision).

The requirement for the drafting and publication of the Policy rose from an international recommendation and the ensuing national obligation. The Group of States against Corruption (GRECO), the body under the Council of Europe, issued a recommendation in its evaluation report, suggesting that *the Police should develop an anticorruption strategy/policy to be made known to the general public.*

One of the objectives set in the Government decision in principle on anticorruption measures as well as in the respective Action Plan for 2021-2023 envisages the *development of anticorruption work by the criminal investigation authorities.* As concerns the Police, in particular, the measures to be taken towards this objective entail the objective whereby *"the Police shall draft an anticorruption strategy/plan of action to be communicated to the general public."* The National Police Board was appointed as the responsible actor for the Policy work.

## 2 Structure and purpose of the Policy

In addition to openness and transparency, the awareness of potential areas and manifestations of corruption risks are prerequisites of prevention, identification and coherent intervention with corruption.

During the year 2023, the Police, working under the direction of the National Police Board, drafted its Anticorruption Policy which includes the Policy outlines and the present Implementation Plan. The purpose of the Implementation Plan is to intensify the message sent by the Policy.

The present Implementation Plan goes into more detail about the Policy, explaining the principles in the subject matter and presenting the means to attain the set objectives. Moreover, the Implementation Plan describes individual administrative means that contribute to the reaching of the objective.

The Police defines its own strategy and Values, including the related principal messages. Our Code of Ethics derives from the Police obligations and Values. The Values and ethicality lay the foundations for anticorruption work and are thus an integral part of the Policy.

The Implementation Plan is based on the identification and management of the major corruption risks. In addition to the internal expertise of the working group established at the National Police Board of Finland for the Policy effort, the preparatory work was also promoted by the contributions and professional advice of the internal audit and legality control functions (corporate governance) of the National Police Board, the national anticorruption coordinator located at the National Bureau of Investigation as well as the special prosecutor at Prosecutor General's Office, responsible for leading any investigations on suspected crimes committed by Police personnel. The present Implementation Plan lists the major corruption risks.

The Police anticorruption work is an ongoing process. Therefore, the Implementation Plan ends with a description of the elements of future anticorruption work at the Police.

### 3 Definition of corruption

Corruption is misuse of influence to gain unlawful advantages. Mostly, the advantage or benefit is of financial nature. A distinction between financial and ethical corruption can also be made. Characteristically, financial corruption refers to various forms of bribery. The most typical idea of the phenomenon probably refers to accepting a bribe destined or aimed at influencing the operation of a civil servant, for example, in decision-making where the briber is a party. In turn, ethical corruption refers to the abuse of influence or discretionary powers with no implicit financial motivation. The category might include, for example, nepotism (favouring one's relatives), with no direct aim to gain any financial benefits.

In the Policy, the definition of corruption comprises both the financial and ethical forms of corruption since we expressly wish to emphasise that we fight any type of corruption.

### 4 The objective and principles of the Police Anticorruption Policy

#### 4.1 Objective

Our main objectives is: "the trust in the Police remains at a high level, we do not accept any form of corruption." The Police enjoys a strong trust among the citizens, and its level has been high for a long time. Since we intend to preserve this high level of trust also in the future, our statement is that we have zero tolerance to corruption. This means that we do not tolerate or condone any corruption, in any form. As the Supreme Command

of the Police, we will send this message about the fundamental idea of our anticorruption work which covers the entire Police organisation.

#### 4.2 Achieved goal

The Policy must relate to both the present and the future. Therefore, we highlight our *achieved goal*: “Operating in line with our Values also in the future, we will match up to the high trust we enjoy at now.” From the perspective of our work, it is indispensable that the Finnish Police is seen as a trustworthy actor. The first strategic goal of the Police is: “We safeguard the civil peace and maintain the trust in the Police at a high level.”

The Police Values (Customer service, fairness, professionalism, staff wellbeing) support our anticorruption work. Justice and fairness constitute the cornerstones of anticorruption work. When we succeed in providing the services, it creates trust in us, at the same time strengthening our impartiality. Our professionalism and staff wellbeing play a great role in the way our operations appear in the public eye. When our Values are operative and we live up to them, we will be trusted. Staying true to our Values also in the future, we will be able to retain the high level of public trust and match the confidence we enjoy.

#### 4.3 Principles Police Anticorruption Policy

The core of the Policy is constituted by the principles adopted on 1 February 2024, and following them, we will meet our objectives.

##### 4.3.1 Maintaining high trust in the Police

Confidence and trust shown by the society at large is an absolute prerequisite for the Police to operate. The principal responsible authority in Finland in internal security, the Police exercises important public powers. In line with the legislative provisions regarding the Police functions, *the Police maintains security in collaboration with other authorities, the communities and inhabitants*. Trust is also the key element enabling collaboration.

The Police operations are covered by several Acts, some of which refer directly to the Police while others comprise authorities or administration in general. Moreover, we respect the national and international legislation on basic and human rights in our operations.

Each Police officer gives an ethical oath at end of their Police training. The oath is not legally binding but it is pronounced to emphasise the responsibility associated with the work in the Police. The purpose of the oath is for the new Police officers to become aware and internalise the Values and modes of operation expected of the Police in Finland.

When we follow the Law in all our operations, and, above all, the *ethics* constituted by the Code of Ethics, oath and Police Values, we will attain the trust in us.

#### 4.3.2 The Police has zero tolerance to corruption

We do not accept any form of corruption and fight and prevent it, for example, through instructions and orders and by underlining ethics in all our operations.

The Police upholds several national-level *norms*, i.e., instructions and orders which contribute to our anticorruption action. Some of the norms provide guidance towards correct action; others say what not to do. Some of the norms are guides to procedural action in cases of suspected corruptive features detected.

When we follow the instructions and orders that are legally binding, complemented by the operative *ethics*, we show, both within our administration as well as externally, that we have zero tolerance to corruption.

#### 4.3.3 We are aware of, recognise and manage corruption risks

We have incorporated the corruption risks into our risk management approach. The means of risk management include the avoidance, minimising and elimination of the risk, or the transfer of the risk to the responsible actor for the measures to be taken. The risk management and notification system also allows for a communication for any suspected corruption risk.

Through training and communications, we ensure that the Police staff recognises any misconduct and corruptive features as well as knows the whistleblowing procedure. The Code of Ethics and Values constitute part of the curricula of the Police University College degrees and further education. The use of the Ethics channel is part of the training for the Police degree gained at the Police University College. The officeholders at the Police Administration also receive training in equality and officeholder ethics.

With due attention to the identification of misconduct through training and communication, we enable our staff to realise, recognise and manage corruption risks as a part of the risk management whole.

#### 4.3.4 We ensure the detection and reporting of misconducts

The staff is obliged to report any misconducts and malpractices, and the superiors are also obliged to intervene in them. Based on the legally binding Police order, *when a Police staff member notices misconducts or crime in the operations, they must immediately inform the superior about such circumstances.*

We have introduced an internal information and whistleblowing channel which the entire organisation is aware of. The staff has received extensive information on the introduction of the Ethics channel. The national instructions for ensured legality at the Police contains the guidelines for the use of the Ethics channel. The notification to the Ethics channel can be made anonymously, and all received information is handled confidentially.

We ensure effective investigation of Police crimes through a centralized investigation arrangement. In early 2024, the Police introduced a centralised Police crime investigation arrangement, organised under the National Bureau of Investigation. Along with this change, the Police crime investigators and heads of investigation will be fully separate from other crime investigation work.

Through the introduction of the above described Ethics channel and the centralised investigative arrangement focusing on Police crime, we ensure that any misconduct is uncovered and investigated efficiently. By underlining the obligation to report, we ensure that misconducts are efficiently notified.

#### 4.3.5 Faced with any corruptive features, we take immediate action

When we notice features suggesting corruption, one of our immediate measures is to assess the coverage and sufficiency of our controls, and we will communicate the observations made. We improve our internal control function continuously, communicating efficiently both internally and externally. For example, we have recently revised our legality control guidelines, and information has been provided in a timely manner on a nationwide basis. The guidelines are freely accessible at the poliisi.fi site. One subarea of our internal controls is to follow the adherence to our guidelines and orders. The observance of corruption prevention is thus also secured in the form of legality control *ex post facto*.

We systematically assess the Police capacity to fight corruption and make this part of our internal control function. When we come across a new area of risk, we reflect on ways to control it. Should we note inadequacies in our capacity to control corruption, we report it, through independent actors, to the supreme command.

By developing the controls in a spirit of open communication and by assessing our own capacity to prevent corruption as an element of internal controls, we also satisfy this principle.

## 5 Values and ethics

The Police Values, the Police Code of Ethics and the Police Anticorruption Policy constitute the **ground rules of Police operations**.

## 5.1 Police Values and main messages associated with them

The Police is charged with ensuring the safety and security of people and the environment always and under all circumstances. In addition to legislation and other norms and provisions, our operations are based on [Police Strategy](#), [Police values](#), [Ethical Code for the Police](#) and *the Police Anticorruption Policy*.

The Police Values are *customer service, fairness, professionalism and staff welfare*. The Values set the basis for the eight principles of the Police Code of Ethics, with the purpose of enhancing the existing good practices. The Police Code of Ethics guides our operations and thereby promote good corporate governance and general trust in the Police.

**Customer service.** The Police provide basic security for all citizens. We serve our customers and customer satisfaction is one of our key indicators.

**Fairness.** The Police are reliable and incorruptible. We set an example to others, both on duty and in our private lives. We treat everyone impartially and equally.

**Professionalism.** The operating environment of the police, and the operating methods we use change constantly and continuous learning is the prerequisite for work performance. Everyone's contribution matters in the work community.

**Staff welfare.** Motivated and well-being staff members achieve results. Everyone contributes to achieving a positive and encouraging atmosphere, working together, and ensuring our personal capacity to work. We value our colleagues. Management is professional.

The Police has launched a discussion on the Values, with the purpose of assessing the up-to-dateness and effectiveness of our current Values in relation to the changes in the Police operating environment and the actions imposed by the Strategy, as well as to the staff view about their fulfilment in practice. The objective is to finalise the Value process by the end of year 2024.

## 5.2 Ethical Code for the Police

Ethicality is a sign of good governance. Adopted in the year 2019, the Police Code of Ethics consists of eight principles which reflect the Police Values and Strategy. In everyday work, we face complex choice situations with self-evident modes of operation. The Police Code of Ethics guides our operations and thereby promotes good governance and general trust in the Police.

The purpose of the Police Code of Ethics is to enhance the existing good practices. It is key for us to commit to the Code of Ethics and follow it in our work. The responsibility of the command and superiors is to promote the objective and set an example through their own operation.

The principles of the Police Code of Ethics

*Policing is predictable and has always a legal basis*

Citizens should be able to trust the police in all situations. For this reason, our activities are predictable, and have a legal basis. We will never resort to unlawful methods in our duties. We will secure the realisation of fundamental and human rights in all our activities.

*The police acts in an equal and fair manner*

Discrimination or harassment are not tolerated in our working community on any grounds. We are humane and are all responsible for not encouraging discriminating or degrading conduct in our own actions or in that of others.

We treat all people, both our customers and colleagues, equally, regardless of their individual characteristics or background. We will not take a derogatory, degrading or prejudiced attitude to anyone.

We encourage all people, regardless of their background, to seek employment in the police administration, and will support everyone's career development equally.

*The police has a positive attitude to transparency*

We exercise significant authority in society and acknowledge that in order to control this authority we must provide information on our activities.

Our activities will always be as transparent as possible, in accordance with the principle of transparency. We actively produce statistical and other data to support public debate, and we communicate actively using modern communication methods.

At the same time, we make sure that we will never leak confidential information given to us. We will only use our data systems to carry out our duties and will ensure a high level of data security in all situations.

*Police conduct is exemplary*

Legislation sets a specific requirement for our conduct that we will adhere to in our duties and in our private life. We will not behave in a manner that would put at risk the confidence that people have in policing.

The Finnish police is represented by a competent and professional police and civilian staff. Regardless of rank, we all give face to our organisation and form the image that citizens have of policing.

The police can be identified by the uniform that we carry with pride and in accordance with the relevant regulations.

*The police is impartial and independent*

In our duties, we will not seek personal gain and we will observe the disqualification provisions in all our activities. We cannot be bribed and will

not accept financial or other benefits that might put at risk the confidence that people have in us.

Our personal commitments will not put at risk our ability to carry out our duties in an appropriate and equal manner. We adhere to the instructions regarding secondary employment.

It is of utmost importance to us that citizens and society trust us. We show others respect, sincerity and honesty. We are true to our word.

*Police staff work with a sense of community*

We value good working community skills. Sustainable well-being at work is based on cooperation of all staff members. We know how to adapt our activities in changing environment, and we are always willing to learn.

We support each other in difficult situations. In our working community, we promote transparency and help build a trusting atmosphere. We are committed to our organisation and its values.

Our most important resource is the cooperating community that shares knowledge.

*Police values are evident in leadership*

We lead in a just, responsible and ethical manner. We will not compromise on ethical principles even when we need to make decisions and take action quickly. Our leadership includes the legality and quality control of operations.

Good-quality leadership helps us to achieve the goals set for us. Supervisory work ensures open interaction and helps us to develop cooperation among staff members in a systematic manner.

We value the individuals' experience, skills and views regardless of their duties. This is how we can create the basis for building trust, well-being at work, developing personal skills, and success at work.

*The police use their resources appropriately, effectively and responsibly*

We use the available human resources, the allocated funds and property, and our other resources in the most appropriate and effective manner in accordance with the requirements of our duties.

Our use of funds is transparent and documented. The procurement of goods required for our operations is conducted systematically, taking financial aspects into consideration.

We will all ensure that we handle all property in police possession responsibly

## 6 Main identified corruption risks

We have identified the major corruption risks and divided them in three different categories as follows:

### **Administrative corruption risks**

- recruitments and appointments to office
- secondary occupations
- political corruption and other related influence

### **Corruption risks of penal law nature (motivated especially by economic benefit)**

- bribery offences, breaches of office
- thefts, frauds, embezzlements

### **Other corruption risks**

- procurements
- accepting benefits
- "law of silence"
- misrepresentation of facts
- favourism
- abuse of discretionary powers

Each risk category includes corruption risks of both economic and ethical nature.

## **7 Means of corruption risk management**

Chapters 7.1 and 7.2 describe the general means to manage corruption risks.

In addition to risk-specific means of management, each risk can be object of special control actions.

### **7.1 Legislation and Police administrative norms**

The Administrative Procedure Act is the tool to implement and promote good corporate governance. The objective of the Act on Public Officials in Central Government is to safeguard the effective and purposeful handling of State tasks, fulfilling the rule of law. The Act on Police Administration includes the norms on the competence, conduct and professional skills of a Police officer. The Penal Code determines the actions and neglects that are punishable under criminal law. At the Police, the prevention of corruption takes place ultimately on the basis of legislation guiding us and enacted in line with the Finnish Constitution. As a source of law, the legislation imposes a strong obligation.

Under the Act on Police Administration, Section 4, the National Police Board has issued, for example, the following administrative norms which, for their part, prevent corruption.

- Receiving donations in Police administration
- Secondary occupations in Police administration
- Standing order on finance

- Police procurements and materials management

Moreover, the National Police Board has issued administrative norms which guide or prescribe how to proceed if, for example, corruptive features are identified in the Police:

- Internal supervision of legality and handling of compensations for damage
- Police internal control and corporate governance
- Measures in the Police pertinent to the law on civil service
- Police risk management
- Prevention, uncovering and investigation of bribery and other crime
- Investigation of crime suspected to be committed by a Police officer

The above administrative norms are all legally binding instructions or orders.

By observing the Law and said administrative norms and by acting in line of the procedures defined in them, we prevent corruption and promote the attainment of the operative policy objectives and state goal, also in the future.

## 7.2 Other means of corporate governance

Other individual factors to prevent corruption and, ultimately, to attain the objective include, in particular:

- Training and education
- Induction
- Updated instructions
- Internal and external communication
- Internal control (including, for example, supervision by the superiors, legality control and internal control)

These factors make it possible for us to succeed in the prevention of corruption. Internal and external communication focusing on the Policy will make it recognisable, thereby also preventing corruption. Internal communication on the control mechanisms, such as our Values and the Code of Ethics, enhances our integrity. External communication, such as certain norms published at the poliisi.fi site, send a message to society about the ways in which we are to act in the issues covered by the norm in question. This increases the trust we enjoy.

## 8 Implementation of the Police Anticorruption Policy

The Policy was introduced in all Police units in March 2024. At the same time, the Police units are instructed about their own responsibility of the Policy implementation within the unit in question, and the Policy must be taken into account, along with the Values and the Code of Ethics, in training of superiors and other staff, as well as in staff induction.

The implementation took place through the decision to adopt the Policy. As recommended by the Greco (integrity training focusing on the executive level), the Policy was part of the training at the Strategy Day of 21 March 2024 (with the participation of the Police Chiefs and Deputy Police Chiefs of Units, the Executive Group of the supreme Police Command as well as the superiors of the responsibility areas at the National Police Board).

The Policy is also an object of training in the HR network as well as in other trainings of management and superiors.

The Policy has been published in the internal Police Intranet as well as externally at the poliisi.fi site. The publication was accompanied by news flashes focusing on the Policy. In addition to the present Implementation Plan, an expert blog will be published in late 2024.

In the future, the Policy will be focused on in all degrees at the Police University College by including it in the respective curricula and further training. The implementation of the Policy and its impacts are evaluated as a part of the Police corporate governance whole. The internal ground rules of the Police, in other words the Values, the Code of Ethics and the Anticorruption Policy, will be the object of online training completed at a later stage. As concerns the Anticorruption Policy, the contents of the online training will focus, in particular, on corruption risks and the respective means of risk management.

The inclusion of the Policy in future objective and performance appraisals will be considered during the year 2024.

## 9 Operational programme

The National Police Board units, and those under it, are obliged to take the following action:

- 1) ensure that the Police Anticorruption Policy is taken into account in the training of superiors and other staff as well as in staff induction.
- 2) ensure that all officials in the unit will take the online course, to be published later, as instructed at a later stage.

## 10 Updates of the Police Anticorruption Policy and the Implementation Plan

This Implementation Plan as well as the Police Anticorruption Policy will be updated whenever necessary.

However, the update needs are assessed as required, and at least every two years, i.e., the first time in the summer of 2026. In assessing the update needs, special attention is paid to topical risks and ways to manage them.

On behalf of National Police Commissioner,  
Deputy National Police Commissioner Janne Paavola

Police Lawyer

Visa Weckström

This document has been signed electronically. Police of Finland 14.06.2024 at 14:15. Authenticity of the signature can be verified by the Registry.

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