

ETAP Review of the Force's response to Areas for Improvement and Recommendations made by HMICFRS on Ethical and Lawful Workforce behaviours and Abuse of Position for a Sexual Purpose

What did we review and why is this important?

In 2019, Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS) Inspected Staffordshire Police as part of its regular PEEL inspections focused on Police Effectiveness, Efficiency and Legitimacy.

Based on that inspection, HMICFRS rated the force as good in terms of ethical and lawful workforce behaviour. In her report HM inspector stated that "The force continues to uphold an ethical culture and promote the standards of professional behaviour it expects". Against this backdrop, there were three areas identified for improvement. This review looked at progress made on addressing those improvements.

Whilst it was agreed at Service Improvement and Performance Board in March 2021 that the required actions had been completed and could be signed off, this was with the caveat that there was still work to be done and that this work was in sight, underway, and would continue.

In 2019 HMICFRS also produced "Shining a light on Betrayal" which examined how police forces were tackling Abuse of Position for a Sexual Purpose. From this national thematic inspection, 10 recommendations were made. This review looked at the force's response to those recommendations.

This is an important area because public confidence in policing crucially depends upon the maintenance of ethical and professional standards of behaviour. This has become ever more important given widespread concerns raised nationally about the culture within policing, the effectiveness of vetting and actions taken to deal with unacceptable behaviour, both internally within the force and in dealing with members of the public.

How did we go about the review?

We looked at both 2019 HMICFRS Inspection reports and the detail of the recommendations and areas for improvement. We had full access to the force's documentation and tracking systems which clearly outlined the actions taken by the force on both reports.

A meeting with the head of the Professional Standards Department provided a detailed update on progress. The Force's Governance, Planning and Policy Manager provided detailed information which evidenced the actions taken by the force.

The Professional Standards Department's Complaints and Conduct Manager met with members of ETAP's Ethics and Review Panel to provide an up-to-date picture in relation to the internal Force Ethics Panel and other issues.

ETAP members are not 'experts' or 'auditors'. We are a panel of independent local individuals appointed to bring transparency and openness to the workings of Staffordshire Police and Staffordshire Fire and Rescue Service.

ETAP member Jane King worked on this review.

What did we find?

We found that:

Ethical and Lawful Workforce Behaviour:

The force responded effectively and appropriately to the concerns raised. We received a high level of assurance that the issues had been taken seriously and practical actions taken, including the allocation of additional resources in terms of both people and systems.

- **An effective process for the workforce to refer ethical concerns:** there is now an internal ethics panel, with an independent chair, which meets quarterly, drawing on interested volunteers from across the force. There are some challenges in getting enough people involved given other commitments, but the panel has been successful in raising and sharing topical ethical dilemmas through the display board system. The force is also actively involved in the Midlands Regional Ethics Board which aims to share ideas and good practice.
- **Monitoring of vetting decisions to identify disparities:** Data is recorded and managed manually which allows for scrutiny and monitoring of decisions by both professional standards and the Diversity and Inclusion Lead
- **Capability and capacity in the counter corruption unit:** additional staff have been recruited who bring skills and experience to enhance the capability of the department. Due to increased resources the anti-corruption unit is now better able to proactively focus on key threats such as abuse of position for a sexual purpose.

Abuse of Position for a Sexual Purpose:

The ten recommendations made in this Report covered a wide variety of issues including compliance with all national guidance on vetting; standardised lists of information shared between forces when someone transfers; work to implement ICT monitoring; recording of corruption using national categories and links with agencies that support vulnerable people.

The PSD Position Statement of October 2022 provides detailed assurance that eight of the ten recommendations have been completed. See below for our questions on the remaining two.

What questions/advice do we have and how

1. **Monitoring of vetting decisions to identify disparities:** Data is currently recorded and managed manually which allows for scrutiny. What is the timescale for updating software to provide this information?

has the force responded?

Force response: A paper submission if being present to the DCC Command Board on 11th May 2023 to introduce a new vetting IT system to reduce vetting times, enable performance data to be produced and provide a governance tool for the department. This will also produce reports to identify any disparities. Currently a manual disproportionality report is produced from the vetting data monthly by the ACU analysts and has been expanded to cover all protected characteristics, not just ethnicity. Furthermore, arrangements are being made with ETAP for further independent scrutiny of vetting decisions to provide further transparency for the public.

2. **Recommendation 1:** Forces should make sure all personnel have been vetted to a high enough level for the posts they hold.

PSD response October 2022: this is currently an area of non-compliance, in relation to the periodic reviews of clearance.

We understand the rationale behind the decision, based on resources and demand, to focus on vetting of new recruits into the organisation. At what point will the force be fully compliant with this recommendation and how is it handling the current risks?

Force response: We will be launching the Annual Integrity Review (AIR) process during 2023. This will be rolled out over the next 12 months so that the demand created within vetting will be manageable. As part of this, when returns from AIR are received, vetting will update the vetting file and checks that the individual has right level of clearance for their post, taking appropriate remedial action where necessary.

3. **Recommendation 8:** “Where forces are yet to implement an effective ICT monitoring system that allows them to monitor desktop and handheld devices, they should do so as soon as is reasonably practicable”. What progress is being made in this area and when does the force anticipate being fully compliant?

Force response: The force has commenced roll out of an IT solution which will be fully implemented during 2023. Until full implementation the force continues to put additional mitigations in place through proactive and reactive investigations and intelligence-gathering.

Follow-up actions /further review

New national service recommendations were published by HMICFRS in November 2022, following the Murder of Sarah Everard by a serving police officer: “**An inspection of vetting, misconduct and misogyny in the police service**”. At an appropriate time, we will be keen to understand in detail the force’s response to these recommendations, probably in Autumn 2023