


PCC and CC Force Inspection response record

Version:

Force	Staffordshire
Police and Crime Commissioner	Ben Adams
Chief Constable	Chris Noble
Title of inspection	A report into the effectiveness of vetting and counter-corruption arrangements in Staffordshire Police
Inspectorate	 <p>His Majesty's Inspectorate of Constabulary and Fire & Rescue Services</p>
Summary of inspection	In November and December 2022, HMICFRS inspected Staffordshire Police to examine the effectiveness of the force's vetting, IT monitoring and counter-corruption arrangements.
Grade	Adequate
Recommendations	N/A
Areas for improvement	<p>Area for improvement 1</p> <p>The force should improve its vetting arrangements to ensure that:</p> <ul style="list-style-type: none"> it has a clear understanding of the level of vetting required for all posts, and that all personnel have been vetted to a high enough level for the posts they hold; it has a clear understanding of the vetting required for all non-police personnel and that all non-police personnel have been vetted to a high enough level for their role; the vetting unit has sufficient staff to meet the demand it faces; and it analyses vetting data to identify, understand and respond to any disproportionality. <p>Area for improvement 2</p> <p>The force should improve how it collects, assesses, develops and investigates counter-corruption intelligence by ensuring that:</p> <ul style="list-style-type: none"> it produces a comprehensive annual counter-corruption strategic threat assessment, control strategy and implementation plan with accountable action owners, and uses them to identify and manage corruption threats effectively; it carries out proactive intelligence collection and accurately assesses all corruption-related intelligence; and it has current policies relating to notifiable associations, business interests and gifts/hospitality and implements them effectively to identify and manage corruption threats.

Police Crime and Commissioner's initial response

Ben Adams, Staffordshire Commissioner welcomes the new HMICFRS arrangement to provide a separate inspection examining the effectiveness of the force's vetting, IT monitoring and counter-corruption arrangements against a backdrop of continued public concern. Backlogs of vetting and staffing issues have been monitored as part of the PCC governance arrangements over the past 12 months and the PCC is keen to see sustained improvements in this area. The force has been rated as adequate but has two areas for improvement which now form part of an action plan which is progressed by the force and will continue to be monitored by the Commissioner's office.

Chief Constable's response

HMICFRS found Staffordshire Police to be adequate in its inspection of our vetting and anti-corruption arrangements.

We will study the findings closely as we look to continually improve this critical area of our work.

The inspection found areas where the force was performing well, not least given the substantial workload facing our vetting and anti-corruption staff as we review all serving officers and staff as part of the historic 'data wash', requested by the Home Office of all forces, following the conviction of David Carrick.

While we have secured additional resources to improve the timeliness of our vetting process, we recognise that more is needed, not least in improving the information systems that underpin work in this area. It was pleasing to note that HMICFRS acknowledged our commitment to assessing the impact of vetting on black and minority ethnic joiners, to minimise any disproportionality in vetting.

We will continue to improve our counter-corruption arrangements, to ensure that we can take swift action wherever corruption might take place.

Staffordshire Police accepts only the highest standards of its officers and staff, which we clearly communicate, and we will take robust action in any case where these standards fail to be met.

AFI 1:

The Vetting Unit maintains a list of all posts in Force, the level of clearance required for that post, the current postholder and the level of clearance they hold and its renewal date. Work is ongoing to ensure that all personnel are cleared to the correct level for the post they currently hold. The Vetting Unit receives a daily update from HR in relation to new appointees and internal moves so that the list can be updated.

The Force has a good understanding of the vetting required for all non-police personnel. Procedures are in place to ensure that no Non-Police Personnel (NPP) are given unsupervised access to police assets without vetting clearance. The gap lies in vetting & HR being notified that the access is no longer required, so rights and clearance can be cancelled.

Demand continues to outweigh resources. Consideration is being given to investment in a more efficient case management system and additional personnel.

Using the Adverse Impact Ratio, the Force routinely monitors for disproportionality in vetting.

AFI 2:

The Anti-Corruption Unit (ACU) has an overarching Counter Corruption Strategy, a Staffordshire Strategic Threat Assessment which feeds into the Control strategy and subsequent delivery and actions plans to achieve the strategy objectives. These have individual action owners and target dates identified. The governance of these plans is through the 4-weekly DCC People Intelligence Board and monthly Governance Board chaired by the Performance and Standards Department (PSD) Superintendent.

For STUDIOS* threats, each area has an action owner within the ACU and all identified risk nominals are assigned to a case worker to conduct relevant intelligence proactive and reactive work. The current Op Setter Matrix (for sexual misconduct) and other corruption matrix is a proactive tool which uses intelligence to identify risk nominals for allocation.

Intelligence is collated through various platforms and forums including monthly meetings with finance, FiSP* notifications, Notifiable Association ownership as well as through disclosures made through confidential and overt reporting lines and mechanisms. The intelligence is recorded and graded on CLUE* with overall ownership by the ACU DCI. Actionable intelligence is allocated to an investigator to progress. Other intelligence is assigned to an analyst to develop where possible. The ATA* system for Mass data audit is on track for implementation Q3 2023 which will provide a wider pool of intelligence and information for the ACU. The Notifiable Association (NA) policy has been implemented and is owned by the ACU. There are approximately 200 Back Record Conversions (BRC) outstanding although each NA is graded accordingly and managed in accordance with the NA policy for monitoring, action and review.

The Business Interests policy is currently being adopted by the PSD. There are 300 BRCs outstanding. The policy has just been finalised and will be sent out for consultation during July. The ACU DCI is meeting with IT on 18/07/2023 regarding the Gifts and Gratuities database, with a simple solution of Microsoft forms being created. The policy will not need any major amendments as it is just the process platform which will change. The policy and process will be retained within the ACU and be monitored for intelligence for corruption risks.

**STUDIOS are the corruption categories (Sexual misconduct or abuse of position for a sexual purpose, Theft and fraud, Unauthorised disclosure of UK Law enforcement information, Drug use and supply, Inappropriate and notifiable associations, Organised crime threats of corruption or infiltration, Social media use)*

**FiSP is the Force Information Security Policy*

**CLUE is an internal intelligence system*

**ATA is the system the force intends to fully implement to support our opportunity to exploit the mass data auditing of police systems*

Police Crime and Commissioner's overall comments

It is noted that these areas for improvement relate to demand, capacity and pro-activity which are similar issues to previous HMICFRS inspections. The Commissioner has particularly supported the force in increasing resource levels in the Vetting and Anti-Corruption Units which he hopes will assist in addressing some of the concerns highlighted. The Commissioner acknowledges the comprehensive plans in place to deliver continuous improvements across the force but is keen to see that root causes are addressed with effective supervision, responsibility and accountability. There have been significant and encouraging improvements in leadership development and performance management in recent months. There remains some work to do and the Commissioner will maintain oversight of the force's progress in this area through established performance and accountability frameworks.