



# PCC and CC Force Inspection response record

Version:

Force	Staffordshire
Police and Crime Commissioner	Ben Adams
Chief Constable	Chris Noble
Title of inspection	Inspection of vetting, misconduct and misogyny in the police service
Inspectorate	HMICFRS
Summary of inspection	On 18 October 2021, using her powers under section 54(2B) of the Police Act 1996, the then Home Secretary commissioned us to carry out a thematic inspection to provide an assessment of current vetting and counter-corruption arrangements in policing across England and Wales – to include forces' ability to detect and deal with misogynistic and predatory behaviour. This report describes 5 areas for improvement and makes 43 recommendations.
	<ul> <li>These recommendations are designed to strengthen the systems by:</li> <li>introducing more thorough pre-employment checks;</li> <li>establishing better processes for assessing, analysing, and managing risks relating to vetting decisions, corruption investigations and information security;</li> </ul>
	<ul> <li>improving the quality and consistency of vetting decision-making, and improving the recording of the rationale for some decisions;</li> <li>extending the scope of the law relating to police complaint and misconduct procedures;</li> <li>strengthening guidance for forces in respect of vetting processes, relationships, and behaviours in the workplace;</li> <li>understanding and defining what constitutes misogynistic and predatory</li> </ul>
	<ul> <li>behaviour in a policing context;</li> <li>improving the way the police collect corruption-related intelligence; and</li> <li>improving the way police assess and investigate allegations of misconduct.</li> <li>At the moment, it is too easy for the wrong people both to join and to stay in the police. Too many recent events prove this. If public confidence in the police is to be improved, chief constables, among others, need to be less complacent. Standards need to be consistent, and higher.</li> </ul>
Grade	
Recommendations	28 Recommendations for forces.
Areas for improvement	Area for improvement 1 Forces' use of vetting interviews is an area for improvement. In more cases, forces should interview applicants to explore adverse information of relevance to the case. This should help with assessing

risk. When they carry out such interviews, forces should maintain accurate records and give copies of these to interviewees.

#### Area for improvement 2

Automated links between force vetting and HR IT systems are an area for improvement. When specifying and procuring new IT systems for these purposes, or developing existing ones, forces should seek to establish automated links between them.

#### Area for improvement 3

Forces' understanding of the scale of misogynistic and improper behaviour towards female officers and staff is an area for improvement. Forces should seek to understand the nature and scale of this behaviour (like the work carried out by Devon and Cornwall Police) and take any necessary action to address their findings.

#### Area for improvement 4

Forces' data quality is an area for improvement. Forces should make sure they accurately categorise all items of sexual misconduct intelligence. Sexual misconduct cases that don't meet the definition of AoPSP (because they don't involve the public) shouldn't be recorded as AoPSP.

#### Area for improvement 5

Workforce awareness of corruption-related threats is an area for improvement. Forces should routinely brief police officers and staff on the pertinent and sanitised content of their annual counter-corruption strategic threat assessment.

## Police Crime and Commissioner's initial response

The public rightly expects the highest standards from our officers and this report presents a deeply concerning picture in relation to vetting, misconduct and misogyny in our police service. I welcome this report as an opportunity for Staffordshire Police to confirm adherence to the detailed recommendations and identify where local improvements can be made. The force has already invested in the "Know the Line" campaign to increase awareness of inappropriate behaviour across the service and increase public confidence in the long term. I am absolutely committed to monitoring the force to ensure the right processes are in place for recruitment, vetting and misconduct and holding the Chief Constable to account. I will see that appropriate steps are put in place to embed all recommendations and progress will continue to be monitored at both the regular public performance meetings and internal governance boards.

## Chief Constable's response

I would like to thank HMICFRS for highlighting this important area of policing and fully support the principle that the public should be able to expect and receive the highest standards from their police service. As Chief Constable for Staffordshire, I remain committed to rooting out unacceptable behaviour in all its forms and, where found, dealing with it promptly and robustly.

The recommendations and areas for improvement included in the report are welcomed and I will ensure that those identified for Chief Constables will be implemented in Staffordshire as soon as practicable. It is reassuring that the majority of these areas where improvement is required nationally have been identified by my Professional Standards Department in advance of the publication of the report and that work has already commenced and remains ongoing to address these as set out below:

Much work has been undertaken within Staffordshire Police to understand and deal with sexual
misconduct. This has been a long-standing area of work in order to root out those behaviours
which are incompatible with policing. A thematic problem profile has been commissioned which
has enabled the counter corruption unit to understand the scale and nature of the behaviours and
has supported the establishment of processes which identify risk, allow appropriate assessment of
this risk and then the subsequent management of those individuals. There has been an uplift in
staff within the counter corruption unit to support this work and includes the training of over 1000

staff and third sector and commissioned services in bespoke 'Know The Line Training' which is an internal campaign to target sexual misconduct.

• A strong 'Call it Out' culture has been developed and supports the ambition of creating a safe and inclusive working environment where these behaviours will not be tolerated.

This work supports Staffordshire Police's commitment to tackling Violence Against Women and Girls (VAWG) and a review of all internal allegations relating to not only VAWG but also Police Perpetrated Domestic Abuse (PPDA) has been carried out. Enhanced learning has been identified and now features on separate control strategies to reinforce the commitment to improving investigations and outcomes for women and girls.

- Staffordshire Police are committed to undertaking the Historical Data Wash programme which will see all police officers, Police Staff, Specials and volunteers have their details 'washed' through police information systems to ensure that there is no concerning adverse information known about individuals which is not currently known to the force. This programme will conclude in September 2023.
- To support the force where adverse information is known, a structure of 'Confidence Panels' has been developed which supports a multi-disciplinary approach to implement the appropriate risk management strategies. This provides robust management and oversight on those individuals who present a potential risk to either themselves or public confidence. To support this, following the conclusion of misconduct proceedings a full re-vet of the individual is implemented.
- A system of ethical decision making and transparency has been adopted and through an independent oversight group, dip sampling and auditing of vetting decisions are carried out.
- A regular review meeting is in place to ensure that where progress is needed this is made at pace and to provide governance and oversight to the ongoing work. This review mechanism also looks to identify and address any blockages and ensure that sustainable and long-term improvements are in place. Work that is being progressed is tracked through the force's action plan and it is anticipated that further specific actions will be completed in the coming months.

In addition, all HMICFRS recommendations and Areas for Improvement are subject to monthly updates that are provided to the Home Office.

In summary, my officers and staff will continue to implement all recommendations and areas for improvement and ensure that local procedures and practices are robust and appropriate. Progress will be monitored at Executive Officer level through regular meetings between the Deputy Chief Constable and Professional Standards Leads. I will also be personally monitoring the implementation of these recommendations and anticipate that they will be met in a timely and effective manner.

# Police Crime and Commissioner's overall comments

I am confident that the force now has robust plans in place to improve vetting processes and decision making together with other interventions to tackle sexual misconduct. These have been adapted to take into account more recent national initiatives including the national PND Historical Data Wash programme. These plans are supplemented by an enhanced scrutiny and monitoring arrangements. I will ensure close monitoring of progress against this plan through the governance framework operated by my office and continue to hold the Chief Constable to account for its delivery through internal and public accountability meetings.