

NOT PROTECTIVELY MARKED

Our ref:TP/VS

11 November 2019

Dear Home Secretary

HMICFRS inspection: Shining a Light on Betrayal: Abuse of Position for a Sexual Purpose

I welcome the national HMICFRS thematic inspection report which was published at the end of September and the opportunity to comment.

Abuse of position and police integrity impact on public confidence and it is important that the public understands the action the police are taking to address those instances where problems occur. There are five recommendations arising from the report; three of which are aimed at Constabularies.

I have received a detailed response from Suffolk Constabulary (which outlines the action being taken by the Joint Professional Standards Department which works across both Norfolk and Suffolk Constabularies). In relation to each of the five recommendations, Suffolk Constabulary has explained the current position and its plans. Ongoing progress over the next year will be monitored via my Accountability and Performance Panel meeting.

I attach the Constabulary's response for your information.

Yours sincerely,



Tim Passmore
Police and Crime Commissioner for Suffolk

HMICFRS PEEL Spotlight Report

Shining a Light on Betrayal: Abuse of Position for a Sexual Purpose

Published 27th September 2019

Introduction

During the 2018/19 PEEL inspections HMICFRS found that overall the extent to which Norfolk and Suffolk Constabularies treat the public and their workforces legitimately is good.

The recently published HMICFRS report Shining a Light on Betrayal focusses on how the police service is responding to the issue of police officers and staff who abuse their position for a sexual purpose. This report provides Norfolk and Suffolk Constabularies response to the recommendations made in the Spotlight report. Norfolk and Suffolk have a Joint Anti-Corruption Unit that is part of the Joint Professional Standards Department. The force position in relation to the recommendations in the Spotlight report is the same for Suffolk as for Norfolk.

Recommendation 1

All forces that are not yet doing so should immediately comply with all elements of the national guidance on vetting. By July 2020, all forces that haven't yet done so should vet all personnel to the appropriate standard. Forces should also have a clear understanding of the level of vetting required for all posts, and the level of vetting held by all their officers and staff. Forces should make sure all personnel have been vetted to a high enough level for the posts they hold.

Norfolk and Suffolk position:

Norfolk and Suffolk carry out vetting checks for new police officer recruits, special constables, police staff, co-located partners and contractors in accordance with the national Approved Professional Practice (APP) for vetting. The only area of exception where the forces are not compliant with the APP is in respect of the renewal¹ and review² of vetting clearances. Where adverse information comes to light this will trigger a review of the vetting clearance, however the unit is not currently resourced to carry out routine reviews and renewals. The force manages this situation by prioritising outstanding vetting such that all staff have been vetted at least once, renewals for posts with higher levels of vetting are prioritised and an annual integrity health check conducted by supervisors ensures that officers and staff are aware of their responsibilities in terms of disclosable associations, business interests and maintaining professional boundaries. Officers and staff are also reminded of the changes in circumstances which they are required to notify to the vetting unit.

The Constabulary has reviewed its list of posts that require higher levels of vetting and this will be subject to periodic review in the future. The list is available to staff on the PSD Intranet site.

¹ Depending on the level of vetting a renewal is required every 3, 5, 7 or 10 years.

² A vetting clearance can be reviewed at any time and including when adverse information comes to light or there is a change in circumstances. Regular security reviews are also required for individuals with higher levels of vetting clearance.

Recommendation 2

By April 2020, the NPCC lead for vetting and the College of Policing should devise a standardised list of information that should be shared between forces when someone transfers from one force to another. As a minimum, we would expect this to include information on performance, sickness, complaints, business interests, notifiable associations and any other corruption intelligence. All forces should then adopt this as soon as reasonably practicable.

Norfolk and Suffolk position:

This is a national recommendation however in the meantime Norfolk and Suffolk will be standardising the requests that are made of other forces in respect of transferees to ensure that as complete a picture as possible is available in order to make the vetting decision.

Recommendation 3

By September 2020, the NPCC lead for counter corruption and the Home Office should work together with software suppliers to provide a solution to enable all forces to implement proactive ICT monitoring.

By September 2020, the NPCC should also work with forces to establish a standardised approach to using the information that ICT monitoring software provides.

Norfolk and Suffolk position:

This is a national recommendation; however, the Norfolk and Suffolk Head of PSD is part of the NPCC Counter Corruption Advisory Group assisting with this work. Norfolk and Suffolk are rolling out new and enhanced protective monitoring software which has been purchased through regional collaboration.

Recommendation 4

By April 2020, all forces that haven't yet done so should:

- record corruption using the national corruption categories;
- produce a comprehensive annual counter-corruption strategic threat assessment, in line with the authorised professional practice; and
- establish regular links between their counter-corruption units and those agencies and organisations who support vulnerable people.

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 reasonably practicable.

By September 2020, all forces should have completed a review of their use of encrypted apps on police ICT systems to understand the risk they pose and to take any necessary steps to mitigate that risk.

Norfolk and Suffolk position:

HMICFRS reported that Suffolk and Norfolk share an effective counter-corruption assessment and control strategy. It was recognised that information the Anti-Corruption Unit receives is managed effectively but not always recorded in a way that allows it to be compared with national data. This has been identified as a national issue and there is a need to develop the recording categories and provide guidance for circumstances where cases could be recorded under more than once category.

As part of its work to address abuse of position for a sexual purpose the Norfolk and Suffolk Anti-Corruption Unit has established links with local partners who work with vulnerable members of the community. Work is ongoing to refresh these relationships and ensure that awareness of APSP is not diminished with staff turnover.

The rollout of the ICT monitoring software continues and ICT, PSD and the suppliers are working together to overcome technical difficulties. Recommendation 3 is welcomed as it is hoped that this will assist local forces with their installation of the monitoring software.

Recommendation 5

By April 2020, all forces that haven't yet done so should make sure they have enough people with the right skills to look proactively for intelligence about those abusing their position for a sexual purpose, and to successfully complete their investigations into those identified.

Norfolk and Suffolk Position:

Norfolk and Suffolk keep the anti-corruption resource levels under regular review. The need for enhanced proactive capacity has been raised through the Joint Force Outcome Based Budgeting process. Resources are to be considered in line with the corruption threat and the proactive opportunities to manage that threat.

Katie Elliott

Detective Superintendent

Head of PSD

October 14th 2019