

The Rt Hon Suella Braverman KC MP  
Home Secretary  
Home Office  
2 Marsham Street  
London

Our ref:TP/VS

8 December 2022

Dear Home Secretary

**RE: HMIcFRS Thematic -An inspection of vetting, misconduct, and misogyny in the police service.**

Thank you for the opportunity to comment on this thematic inspection. Suffolk Constabulary has provided an initial update on the recommendations for Chief Constables, which is attached and will be published on my website.

I recognise the impact these findings might have on public confidence in the service and while this was not an inspection of Suffolk Constabulary, the findings have consequences for all forces. The recommendations require forces to review policy and processes for vetting to safeguard the public and protect the professionalism of the police.

My Chief Executive, and the Chief Constable, have recently updated the Audit Committee on the inspection report.

In terms of my role in holding to account, I have requested that the Chief Constable reports upon progress to my public Accountability and Performance Panel in May 2023.

Yours sincerely



Tim Passmore, Police and Crime Commissioner for Suffolk

<b>Subject</b>	HMICFRS – An inspection of vetting, misconduct, and misogyny in the police service
<b>Date</b>	22 <sup>nd</sup> November 2022
<b>PURPOSE</b>	To provide Suffolk Constabulary’s response to recommendations made in the above report from His Majesty’s Inspectorate of Constabulary and Fire and Rescue Services.
<b>PREPARED BY</b>	D/Supt Tracey Little
<b>COMMISSIONED BY</b>	DCC Rob Jones.

## **INTRODUCTION**

An inspection of vetting, misconduct, and misogyny in the police service is a thematic inspection conducted by His Majesty’s Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) commissioned by the Home Secretary in October 2021. The inspection assessed current vetting and counter-corruption arrangements in policing across England and Wales. The inspection was commissioned in the wake of the Sarah Everard murder, which involved actions of abuse of authority, kidnap and rape by a serving Metropolitan Police Officer. The inspection assessed forces’ abilities to detect and deal with misogynistic and predatory behaviour.

Whilst Suffolk Constabulary was not one of the forces inspected, of the 43 recommendations and 5 areas for improvement recorded by the report; 29 recommendations and all of the AFI’s have a local constabulary focus. This report provides a summary of Suffolk Constabulary’s position and response to recommendations arising from the HMICFRS inspection.

### **Recommendation 1**

**By 31 October 2023, the College of Policing should update its guidance on the minimum standard of pre-employment checks that forces must carry out before appointing an officer or member of staff. Every Chief Constable should make sure their force complies with the guidance. As a minimum, pre-employment checks should:**

- **obtain and verify previous employment history for at least the previous five years (including dates of employment, roles carried out and reason for leaving); and**
- **verify the qualifications the applicant claims to have.**

### **Response to Recommendation 1**

Suffolk Constabulary’s human resources department completes pre-employment checks including PND searches. Currently references are requested for a three-year period and there are processes for researching gaps in employment history.

Suffolk Constabulary is considering the recommendation to extend this period and any further opportunities to broaden pre-employment checks and awaits the national guidance to review.

## Recommendation 2

**By 30 April 2023, Chief Constables should establish and begin operation of a process to identify, within their vetting IT systems, vetting clearance records where:**

- **applicants have committed criminal offences; and/or**
- **the record contains other types of concerning adverse information.**

### **Response to Recommendation 2**

Suffolk Constabulary's vetting unit maintains records of serving staff who have criminal convictions.

Suffolk Constabulary is working with the suppliers of the vetting ICT function to provide a technical search solution that would support the recommendation.

## Recommendation 3

**By 30 April 2023, Chief Constables should take steps to make sure that, when granting vetting clearance to applicants with concerning adverse information about them:**

- **vetting units, counter-corruption units, professional standards departments, and HR departments (working together where necessary) create and implement effective risk mitigation strategies;**
- **these units have enough capacity and capability for this purpose;**
- **responsibilities for implementing specific elements of risk mitigation strategy are clearly defined; and**
- **there is robust oversight**

### **Response to Recommendation 3**

Suffolk Constabulary's Human Resources, Anti-Corruption and Vetting units have joint processes for screening applications. Where appropriate, effective risk mitigation strategies are recorded and shared with relevant stakeholders. The rationales and letters vetting produce identify who has responsibility to ensure any vetting restrictions/risks are implemented and timescales involved. Vetting forms part of the Professional Development Review process for supervisors and managers.

The Suffolk vetting unit has received a resourcing uplift following the implementation of the revised vetting Authorised Professional Practice (APP). The Vetting unit was subject of a capacity and capability peer review in December 2021; this identified good practice in relation to vetting decision making and recording. The vetting department are implementing the recommendations arising from this review.

The Constabulary is exploring opportunities for greater scrutiny of vetting decisions and processes.

## Recommendation 4

**By 30 April 2023, Chief Constables should make sure that, when concerning adverse information has been identified during the vetting process, all vetting decisions (refusals, clearances and appeals) are supported with a sufficiently detailed written rationale that:**

- follows the National Decision Model;
- includes the identification of all relevant risks; and
- takes full account of the relevant risk factors described in the Vetting Authorised Professional Practice.

#### **Response to Recommendation 4**

Suffolk Constabulary's vetting unit completes detailed rationales for all vetting decisions in line with the National Decision-Making Model (NDM) and fully referenced to the APP. The detailed rationales ensure risks are identified, assessed, and where appropriate mitigated by control measures.

#### **Recommendation 7**

**By 31 October 2023, Chief Constables should introduce an effective quality assurance process to review vetting decisions, including routine dip sampling of:**

- rejections; and
- clearances where the vetting process revealed concerning adverse information.

#### **Response to Recommendation 7**

Suffolk Constabulary's vetting unit undertakes a monthly QA process to review vetting decisions. The unit has been increased by an extra supervisor to improve this process and work is underway to incorporate specific dip sampling of clearances with adverse information.

The Constabulary is exploring opportunities for greater scrutiny of vetting decisions and processes.

#### **Recommendation 8**

**By 30 April 2023, Chief Constables should make sure they comply with the Vetting Authorised Professional Practice by analysing vetting data to identify, understand and respond to any disproportionality.**

#### **Response to Recommendation 8**

Suffolk Constabulary's vetting unit has developed a Vetting Decision Rationale document to identify and incorporate disproportionality into the decision-making process. The unit monitors and produces disproportionality data for monthly scrutiny.

Suffolk Vetting Unit utilises Subject Matter Expert (SME) panels to review vetting application refusals and appeals for applicants with protected characteristics.

The Constabulary is exploring opportunities for greater scrutiny of vetting decisions and processes.

#### **Recommendation 11**

**By 30 April 2023, Chief Constables who have not already done so should establish and begin operation of a policy requiring that, at the conclusion of misconduct proceedings where an officer,**

**special constable or member of staff has been issued with a written warning or a final written warning, or been reduced in rank, their vetting status is reviewed**

#### **Response to Recommendation 11**

Suffolk Constabulary's vetting unit operates a policy whereby any misconduct proceedings resulting in a written or final written warning or reduction in rank prompts a vetting review.

#### **Recommendation 13**

**By 31 October 2023, Chief Constables who have not already done so should establish and begin operation of a process to:**

- **identify the required vetting level for all posts within the force, including designated posts requiring management vetting; and**
- **determine the vetting status of all police officers and staff in designated posts**

**As soon as possible after this, these Chief Constables should:**

- **make sure that all designated postholders are vetted to the enhanced (management vetting) level using all the minimum checks listed in the Vetting Authorised Professional Practice; and**
- **give continued assurance that designated postholders always have the requisite level of vetting.**

#### **Response to Recommendation 13**

Suffolk Constabulary's human resources and vetting units reviewed all posts within the force in 2021. Every post was assigned an appropriate vetting level and a process was implemented to ensure any change to posts or introduction of new posts are submitted to Suffolk's vetting manager for review and assignment of the appropriate vetting level. An annual review is conducted.

The Constabulary's human resources department joiners, movers and leaver process includes a referral to the vetting unit.

#### **Recommendation 15**

**By 30 April 2023, Chief Constables should:**

- **make sure that all police officers and staff are made aware of the requirement to report any changes to their personal circumstances;**
- **establish a process through which all parts of the organisation that need to know about reported changes, particularly the force vetting unit, are always made aware of them; and**
- **make sure that where a change of circumstances creates additional risks, these are fully documented and assessed. If necessary, additional risks should lead to a review of the individual's vetting status.**

### **Response to Recommendation 15**

Suffolk Constabulary's Professional Development Review (PDR) requires an annual review of vetting changes – the criteria are explained within the electronic document and on the vetting web page and forms part of supervisor and management training.

All changes in circumstances reported to the vetting unit are assessed and any risks are reviewed in line with the APP.

Suffolk Constabulary is exploring opportunities to increase the visibility of the vetting team and developing further educational material.

### **Recommendation 16**

**By 31 December 2023, Chief Constables should make routine use of the Police National Database (PND) as a tool for revealing any unreported adverse information about officers and staff.**

### **Response to Recommendation 16**

Suffolk Constabulary awaits the completion of the national work ongoing to establish this tool, it does have a process for local intelligence searching to address the issue raised in the recommendation.

### **Recommendation 18**

**By 30 April 2023, Chief Constables should make sure that there is a robust response to any criminal allegation made by one member of their force against another. This should include:**

- **consistent recording of allegations.**
- **improved investigation standards; and**
- **sufficient support for victims and compliance with the Code of Practice for Victims of Crime in England and Wales**

### **Response to Recommendation 18**

Suffolk Constabulary operates a joint working model between its professional standards department (PSD) and crime safeguarding and incident management department (CSIM) to ensure the most appropriate skilled investigator is appointed. There are joint working processes to ensure timely and effective criminal and misconduct investigations. The Constabulary has recently conducted a review of criminal and misconduct cases involving police officers and staff for a 18-month period. The review demonstrated that offences were recorded in line with National Crime Recording Standards (NCRS), the Victims Code of Practice was complied with, and robust investigations had been conducted. This is further supported by robust supervision and peer review processes.

The Constabulary has delivered considerable training during the last two years with a focus on improving investigation standards and supervision.

The Constabulary is reviewing some policy and processes as a result of the above review.

### **Recommendation 20**

**By 30 April 2023, Chief Constables should adopt the National Police Chiefs' Council sexual harassment policy.**

#### **Response to Recommendation 20**

Suffolk Constabulary fully considered the NPCC Sexual Harassment policy guidance comparing it against our wider Anti-Bullying, Harassment & Victimisation Policy, the latter contained most elements of the NPCC policy guidance. The Anti-Bullying, Harassment & Victimisation policy was amended to include some additions and expanding the sexual harassment content to strengthen this position.

### **Recommendation 24**

**By 31 October 2023, Chief Constables should make sure their professional standards departments attach a prejudicial and improper behaviour flag to all newly recorded relevant cases.**

#### **Response to Recommendation 24**

Suffolk Constabulary awaits the national release of the Flag.

### **Recommendation 25**

**By 30 April 2023, Chief Constables should make sure their professional standards departments and counter-corruption units routinely carry out all reasonable wider inquiries when dealing with reports of prejudicial and improper behaviour. These inquiries should ordinarily include (but not be limited to) sampling the following, in relation to the officer under investigation:**

- their use of IT systems;
- incidents they attended, and incidents they are otherwise connected to;
- their use of work mobile devices;
- their body-worn video recordings;
- radio location checks; and
- misconduct history.

#### **Response to Recommendation 25**

Suffolk Constabulary professional standards department (PSD) conducts investigations in line with Police Misconduct Regulations, Home Office Guidance (HOG) and Authorised Professional Practice (APP). It also has a process in place to review staff who repeatedly come to the attention of the department for complaints or conduct.

The constabulary is reviewing opportunities for broadening the scope of this process.

### **Recommendation 26**

**By 30 April 2023, Chief Constables should make sure their professional standards departments:**

- **produce and follow an investigation plan, endorsed by a supervisor, for all misconduct investigations; and**
- **check all reasonable lines of inquiry in the investigation plan have been concluded before finalising the investigation.**

### **Response to Recommendation 26**

This response is addressed with Recommendation 18.

Suffolk Constabulary professional standards investigation teams employ processes ensuring investigations are assessed and reviewed by a supervisor throughout the inquiry. At the conclusion of an investigation a closing report is completed and is signed off by a supervisor to ensure actions are completed and results recorded correctly.

### **Recommendation 28**

**By 30 April 2023, in the forces where HMICFRS have not carried out fieldwork during this inspection, Chief Constables who have not already carried out a review of all allegations relating to prejudicial and improper behaviour, should do so. The review should be of cases from the last three years where the alleged perpetrator was a serving police officer or member of staff. The review should establish whether:**

- **victims and witnesses were properly supported.**
- **all appropriate authority assessments, including assessments which didn't result in a complaint or misconduct investigation were correct.**
- **investigations were comprehensive; and**
- **any necessary steps are taken to improve the quality of future investigations.**

**These reviews will be subject to examination during HMICFRS' next round of inspections of professional standards departments.**

### **Response to Recommendation 28**

Suffolk Constabulary has already completed a review of investigations spanning an 18-month period.

The Constabulary is reviewing opportunities to expand this review.

### **Recommendation 29**

**With immediate effect, Chief Constables must make sure that forces use Regulation 13 of the Police Regulations 2003 for underperforming officers during their probationary period, rather than the Police (Performance) Regulations 2020.**

### **Response to Recommendation 29**

Suffolk Constabulary human resources and professional standards departments have processes for managing underperformance of student officers utilising Regulation 13 of the Police Regulations 2003.



The Constabulary is reviewing ethical opportunities to broaden the use of Regulation 13.

### **Recommendation 32**

**By 30 April 2023, Chief Constables should make sure that:**

- **all intelligence concerning possible sexual misconduct by officers or staff (including abuse of position for a sexual purpose and internal sexual misconduct) is subject to a risk assessment process, with action taken to minimise any risk identified; and**
- **rigorous additional oversight arrangements are in place to monitor the behaviour of officers subject to the risk assessment process, especially in cases assessed as high risk.**

### **Response to Recommendation 32**

Suffolk Constabulary's anti-corruption unit has processes for identifying, risk assessing and managing officers and staff who pose a APSP risk. This process follows the guidance provided in the NPCC National Strategy 2021: Abuse of position of trust for sexual purpose, and the Good Practice Guide for addressing the issue of Police officers and Staff who abuse their position for a sexual purpose or to pursue an improper emotional relationship. Those individuals are subject of regular reviews, overseen by supervisors within the professional standards department.

Suffolk Constabulary is reviewing opportunities for broadening the scope of these investigations and risk management.

### **Recommendation 33**

**By 31 March 2023, Chief Constables should make sure that counter-corruption units (CCUs) have established relationships with external bodies that support vulnerable people who may be at risk of abuse of position for a sexual purpose, such as sex-worker support services, drug and alcohol and mental health charities. This is to:**

- **encourage the disclosure by such bodies, to the force's CCU, of corruption-related intelligence relating to the sexual abuse of vulnerable people by police officers and staff;**
- **help the staff from these bodies to understand the warning signs to look for; and**
- **make sure they are made aware of how such information should be disclosed to the CCU.**

### **Response to Recommendation 33**

Suffolk Constabulary anti-corruption unit has well developed working relationships with external bodies providing support to vulnerable people, ensuring effective referral and intelligence sharing practices. The Suffolk anti-corruption unit has provided and continues to engage with and provide training inputs to external agencies that including other blue light services, third sector providers and charities.

### **Recommendation 34**

**By 30 April 2023, Chief Constables should make sure that their counter-corruption units actively seek corruption-related intelligence as a matter of routine.**

### **Response to Recommendation 34**

Suffolk Constabulary anti-corruption unit has well established intelligence development processes in place. This includes strong links with internal organisational intelligence structures and regional anti-corruption assets.

Suffolk Constabulary is establishing a new intel cell structure within its anti-corruption unit and reviewing opportunities to enhance its proactive capability.

### **Recommendation 35**

**By 31 March 2023, to protect the information contained within their systems and help them to identify potentially corrupt officers and staff, Chief Constables should make sure that:**

- **their force has the ability to monitor all use of its IT systems; and**
- **the force uses this for counter-corruption purposes, to enhance its investigative and proactive intelligence gathering capabilities.**

### **Response to Recommendation 35**

Suffolk Constabulary anti-corruption unit has the ability to utilise Lawful Business Monitoring, this has been enhanced with the Force mobile device upgrade programme currently in implementation.

### **Recommendation 36**

**By 30 April 2023, Chief Constables should establish and begin operation of an improved system of mobile device management, with accurate record keeping concerning:**

- **the identity of the officer or staff member each device is allocated to; and**
- **what each device has been used for**

### **Response to Recommendation 36**

Suffolk Constabulary's ICT department maintains records of each mobile device, stored within the ICT Dept CMDDB (Central Management Database), along with details of the end user which includes key details; name, rank, role, collar number or payroll number and location.

### **Recommendation 37**

**By 30 April 2023, Chief Constables should:**

- **convene, and hold on a regular and continuing basis, people intelligence meetings; or**
- **establish and begin operation of an alternative process to support the presentation and exchange of corruption-related intelligence, to identify officers and staff who may present a corruption risk.**

### **Response to Recommendation 37**

Suffolk Constabulary's human resources and professional standards departments work closely together to ensure there is a rich picture of people intelligence. This is currently achieved via the professional standards department meeting structure.

Suffolk Constabulary is reviewing opportunities to expand and enhance this process to include other key stake holders and includes the establishment of a multi departmental risk matrix and control measures process.

### **Recommendation 38**

**By 30 April, Chief Constables should make sure that all corruption-related intelligence is categorised in accordance with the National Police Chiefs' Council counter-corruption categories (and any revised version of these).**

#### **Response to Recommendation 38**

Suffolk Constabulary's anti-corruption unit records all corruption intelligence using the NPCC Counter Corruption Categories.

### **Recommendation 39**

**By 30 April 2023, Chief Constables should make sure they have a current counter-corruption strategic threat assessment, in accordance with the Counter-Corruption (Intelligence) Authorised Professional Practice.**

#### **Response to Recommendation 39**

Suffolk Constabulary anti-corruption unit has a counter corruption strategic threat assessment (STA) that mirrors the national counter corruption's STA and is reviewed annually.

### **Recommendation 40**

**By 30 April 2023, Chief Constables should make sure their counter-corruption units:**

- **produce and follow an investigation plan, endorsed by a supervisor, for all counter-corruption investigations; and**
- **check all reasonable lines of inquiry in the investigation plan have been concluded before finalising the investigation.**

#### **Response to Recommendation 40**

This recommendation is also addressed in recommendation 18.

Suffolk Constabulary Anti-Corruption Unit employ processes ensuring investigations are assessed and reviewed by a supervisor throughout the inquiry. At the conclusion of an investigation a closing report is completed and is signed off by a supervisor to ensure actions are completed and results recorded correctly.

### **Recommendation 41**

**By 30 April 2023, Chief Constables should strengthen their business interest monitoring procedures to make sure that:**

- records are managed in accordance with policy and include cases where authorisation has been refused.
- the force actively monitors compliance with conditions that are attached to the approval, or where the application is refused.
- regular reviews of each approval are carried out; and
- all supervisors are properly briefed about business interests held by members of their teams.

#### **Response to Recommendation 41**

Suffolk Constabulary Professional Standards Department records, assesses and reviews all business interest (BI) applications in line with force policy. Clear rationales are recorded and key stakeholders informed.

Business interest reviews forms part of the professional development review process for supervisors and managers.

Suffolk Constabulary is reviewing opportunities to strengthen the BI control measures monitoring process.

#### **Recommendation 42**

**By 30 April 2023, Chief Constables should strengthen their notifiable association procedures to make sure that:**

- they are compliant with the Counter-Corruption (Prevention) Authorised Professional Practice (APP) and that the obligation to disclose all associations listed in the APP is explicit;
- there is an effective monitoring process to make sure that any conditions imposed are being complied with; and
- all supervisors are correctly briefed on the notifiable associations declared by members of their teams.

#### **Response to Recommendation 42**

Suffolk Constabulary has a Disclosable Association policy that reflects the APP, a recent review demonstrated this is well understood. The recording, assessing, and reviewing processes for disclosable associations are conducted in line with force policy and the APP by Suffolk Constabulary's anti-corruption unit.

Suffolk Constabulary has a joint process between the anti-corruption and vetting units to ensure appropriate assessments, reviews and control measures are applied. Disclosable association reviews forms part of the Professional Development Review process for supervisors and managers.

Suffolk Constabulary is reviewing the disclosable association control measures monitoring process.

### **Recommendation 43**

**By 30 April 2023, Chief Constables should make sure that a robust process is in place for completing annual integrity reviews for all officers and staff.**

### **Response to Recommendation 43**

Suffolk Constabulary's professional development review (PDR) process requires individuals and line managers to conduct integrity reviews. This is a regular requirement at supervisor meetings with a final recording of an annual review.

### **Areas for Improvement (AFI)**

Further to the recommendations made by HMICFRS within the report, the inspectorate provided five areas where forces across England and Wales could improve, and these are as follows:

#### **AFI 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.**

Suffolk Constabulary's vetting unit conducts interviews in-line with the APP, these are conducted in person where possible. Interview records are completed and shared with the applicant to ensure transparency. The decision making resulting from the interviews are included within the vetting rationales.

#### **AFI 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.**

Suffolk Constabulary human resources and vetting team are working in collaboration to develop automated links between the existing vetting ICT product and the new HR recruitment system being implemented.

#### **AFI 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.**

Suffolk Constabulary is addressing this AFI via several routes across the organisation: including the Violence against Women and Girls (VAWG) action plan, Leading with Care platform and a Culture and Standards project.

#### **AFI 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 Abuse of Position for a Sexual Purpose (AoPSP) (because they don't involve the public) shouldn't be recorded as AoPSP.**

Suffolk Constabulary Anti-Corruption Unit records sexual misconduct information within two separate sexual misconduct categories. Those records of sexual misconduct that isn't involving a member of the public within one category, and a separate category for when there is an indication that a Police officer or member of staff has abused their position of trust to position for a sexual purpose or to pursue an improper emotional relationship.

#### **AFI 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.**

Suffolk Constabulary's professional standards department includes the themes counter corruption from the National Threat Assessment within training inputs to officers. The unit has created a similar training package for police staff. The Suffolk Constabulary annual strategic threat assessment review is due for completion by the end 2022, a version of which will be available on the professional standards department web page and force briefing platforms.