



RESPONSE BY THE PCC TO HMICFRS INSPECTIONS

INSPECTION DETAILS

Title of Inspection

PEEL: Spotlight Report – Shining a Light on Betrayal

Date Inspection Published

September 2019

Type of Inspection:

- Cleveland Specific National
 Follow Up Thematic
 Partner Inspection

Is Cleveland Police quoted in the Report?

Yes No

EXECUTIVE SUMMARY OF REPORT

HMICFRS have inspected how forces were tackling abuse of position for a sexual purpose in 2015, 2016 and 2017. Over that period it was found that most forces had been slow to take the necessary steps to root out this type of corruption.

Some encouraging progress had been made and examples of proactive and creative work in terms of looking for signs of corruption had been found. Some forces hadn't invested the necessary resources and weren't proactive in looking for corruption.

Nationally, inspections found the following:

- Overall, forces had good ethical cultures;
- Too many people working in forces don't have the correct vetting;
- Too many forces were recording corruption intelligence incorrectly;
- Several forces couldn't monitor their workforce's use of ICT systems;
- Too many forces had ineffective links with external agencies to uncover intelligence;
- Many forces still didn't have enough capacity in their counter-corruption units;
- Forces aren't proactive enough at communicating with the public about corruption; and
- Victims should be at the heart of any investigation.

The recommendations from the report were as follows

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 standards. 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.

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 associates and any other corruption intelligence. All forces should then adopt this as soon as reasonable practicable.

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.

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 that 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.

Recommendation 5 – By April 2020, all forces that haven't yet done so should make sure that 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.

(The report includes the findings for Cleveland Police. The Force was inspected as part of the third tranche. But the inspection findings were so worrying we chose to publish the report sooner than originally planned) HMICFRS – report September 2019

FORCE RESPONSE TO RECOMMENDATIONS

HMICFRS inspection has closed Cleveland's AFIs regarding vetting. The inspection has found that all Cleveland's personnel are vetted to the appropriate level and all vetting checks are completed prior to appointment. Vetting checks on transferees are also being carried to identify any security risk.

The Vetting Unit are working towards developing a bespoke security clearance aimed at identifying security risk associated with abuse of position for sexual purpose.

Cleveland's Counter Corruption Unit accepted the findings from the latest HMICFRS report, and have since implemented several major changes in order to achieve the recommendations and drive the unit forward. Abuse of position for a sexual purpose is one of the crucial areas that CCU want to identify and improve upon and the department has recently invested significantly in order to achieve this.

CCU have invested in the ATA and iBase systems, both mechanisms now being used to gather, assess and score intelligence more effectively, a move which has already made a difference to CCU's capability to conduct proactive checks and this will continue to develop further. All intelligence is appropriately risk assessed in order to understand the threat posed and to prioritise actions. The Unit now operates from a covert location and its capacity has increased, with recruitment and promotion requirements focused on enhancing CCU's capability for covert tactics and intelligence development.

CCU is currently developing an overarching departmental 4P (Prepare/Prevent/Protect/Pursue) Plan. The 4P Plan will compliment other strategic assessments including the CCU Control Strategy, CCU STRA and pertinent departmental AFI's. The Plan will also include a wider strategy in tackling the abuse of position for sexual purpose and the Unit is developing links with organisations who looked after such vulnerable groups, who are more likely to be exploited, such as victims of domestic violence. It is also worth highlighting that all report recommendations will be included in the APSP 4P plan the delivery of the plan will be a priority piece of work for the appointed CCU Prevent Officer.

PCC RESPONSE TO INSPECTION

Comment by the PCC:

As PCC I have ensured that this subject has been regularly brought to my scrutiny programme as I have been keen to see the development of the Department's plans in this area.

It that regard, on 30 November 2018 the Force updated me on how they were going to update their action plan following national guidance.

On 14 May 2019 The force informed me that once the local and national plans have been merged then consideration would be given to the victim's journey, they would consider any themes within the feedback and lessons learnt that inform how things are done to also include victim care in misconduct cases, support for people with protected characteristics and an update on the impact of the work with key stakeholders and partners.

As the report states 'that one instance of sexual abuse of position is one too many' and I will be requesting a copy of the overarching departmental plan as referenced about through my formal scrutiny programme in the New Year.

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