

<b>For Consideration</b>	
<b>Public/Non Public*</b>	<b>Public</b>
<b>Report to:</b>	<b>Police and Crime Panel</b>
<b>Date of Meeting:</b>	<b>7th February 2023</b>
<b>Report of:</b>	<b>Commissioner Henry (PCC)</b>
<b>Report Author:</b>	<b>Dan Howitt</b>
<b>E-mail:</b>	<b>ExecutiveSupport@notts.police.uk</b>
<b>Other Contacts:</b>	<b>None</b>
<b>Agenda Item:</b>	<b>8</b>

## **VETTING, MISCONDUCT AND MISOGYNY INSPECTION 2022**

### **1. PURPOSE OF THE REPORT**

- 1.1 The purpose of this report is to present the Police and Crime Panel with the key findings from His Majesty's Inspectorate of Constabulary and Fire & Rescue Service (HMICFRS) recent inspections of Vetting, Misconduct & Misogyny in the Police Service, including an inspection of the effectiveness of vetting and counter corruption arrangements in Nottinghamshire.
- 1.2 This report also sets out the response from the Force and Office of Police and Crime Commissioner (OPCC) in ensuring that the inspection findings and recommendations are acted upon.

### **2. RECOMMENDATIONS**

- 2.1 That the Panel discuss the report and note the progress made.

### **3. REASONS FOR RECOMMENDATIONS**

- 3.1 For information and assurance purposes, and to enable Police and Crime Panel scrutiny and support of the Commissioner in her oversight of Nottinghamshire Police.

### **4. Summary of Key Points**

- 4.1 In November 2022, HMICFRS published a national thematic inspection report in relation to vetting, misconduct and misogyny, based on force visits undertaken earlier in the year. This included fieldwork undertaken in Nottinghamshire Police force area in March 2022. The report identified systemic failings and missed opportunities in maintaining standards in the police service nationally and

identified 43 recommendations for improvement, 28 of which were the primary responsibility of Chief Constables. The recommendations aim to:

- introduce more thorough pre-employment checks and establish better processes for assessing, analysing, and managing risks relating to vetting decisions, corruption investigations and information security
- improve the quality and consistency of vetting decision-making and improve the recording of the rationale for some decisions.
- improve understanding and definition of what constitutes misogynistic and predatory behaviour in a policing context.
- improve the way the police collect corruption-related intelligence; and
- improve the way police assess and investigate allegations of misconduct.

4.2 Positively, Nottinghamshire was assessed as 'good' as part of the inspection process; with 24 of the 28 recommendations being confirmed as existing practice within the force area. These included but were not limited to the following recommendations:

- Where adverse information is identified about an applicant during the vetting process, the vetting unit counter corruption unit, professional standards department, and HR team work together to create and implement effective risk mitigation strategies where there is robust oversight.
- Vetting decisions are supported with sufficiently detailed written rationale that considers identified risks factors. This is supported by a quality assurance process to review vetting decisions.
- The police national database (PND) is used as a tool for revealing any unreported adverse information about officers and staff. This research is conducted on every person within a vetting file.
- The professional standards departments attach a prejudicial and improper behaviour flag on the local case management system.
- For intelligence around potential abuse of position for a sexual purpose (APSP) there is a risk assessment process, with action taken to minimise any risk identified. There is also a APSP review group that meets to discuss opportunities to develop this area of work.

4.3 In general, the local inspection found:

- Nottinghamshire Police were performing in line with Vetting Authorised Professional Practice (APP). Upon dip sampling of vetting data, all officers

and staff assessed were found to have had the correct level of vetting for their role.

- The Force Vetting Unit (FVU) were found to have sufficient resource to meet normal demand. However, a small number of unallocated cases were identified, and annual review of management vetting cases were found to have been paused to meet the demand of the Police Uplift Programme (PUP).
- The Force Vetting Unit maintained a list, annually reviewed by the Head of Professional Standards Department (PSD) and Vetting Manager, to ensure that those carrying a higher level of risk are designated for either Management Vetting or Management Vetting / Security Clearance vetting. Whilst not formally highlighted as an area for improvement, the Force were encouraged to review this list to capture the roles requiring this higher level of vetting.
- The force had a current counter-corruption Strategic Threat Assessment (STA), which it completes annually to identify corruption risks. The STA and associated control strategy identified three priorities, namely, disclosure of information, inappropriate associations, and sexual misconduct. However, the STA corruption priorities were not shared across the wider workforce which was considered a missed opportunity but was not formally highlighted as an area for improvement.
- The force correctly categorised all 41 items of corruption intelligence reviewed by the inspection team, in line with the national Counter-Corruption (Intelligence) Authorised Professional Practice (APP).
- Since the last HMICFRS inspection in 2018, the Counter Corruption Unit (CCU) had increased in size and had sufficient staffing levels. As such there were some examples of proactive intelligence development, using IT monitoring and proactive system audits. The Force had increased its analytical and investigative resource to enable a more proactive approach as the monitoring capability matures.

4.4 Only one notable area for improvement was identified for Nottinghamshire Police. This related to the further analysis of vetting decision data to explore any disproportionality and, if so, the reasons for these. Whilst the force collated data in relation to vetting decisions for applicants with protected characteristics, data quality did not allow for meaningful analysis. However, from February 2023 the Vetting Unit will transfer to a new system which has mandatory pre-defined fields for protected characteristics which will allow for effective analysis moving forward.

4.5 The OPCC will continue assess Nottinghamshire Police's performance in relation to the outstanding recommendations relevant to Force. The office will also monitor

progress in relation to the recommendations directed to the College of Policing and NPCC leads, so that the Force can be prepared to implement any revised policies and guidance.

## **5. Financial Implications and Budget Provision**

5.1 None - this is an information report.

## **6. Human Resources Implications**

6.1 None – all recommendations of relevance to Force HR are already in practice within Nottinghamshire Police.

## **7. Equality Implications**

7.1 There is potential for unconscious bias within vetting decisions, and both local & national inspection reports recommend that more is done within Nottinghamshire Police to monitor and understand any disproportionality.

## **8. Risk Management**

8.1 There will always be a degree of risk involved with vetting decisions and a risk of misconduct and corruption of Police Officers & Staff. However, as highlighted within the inspection, Nottinghamshire currently has good mitigations in place to manage this risk. Nevertheless, the Force & OPCC are committed to raising general vetting standards.

## **9. Policy Implications and links to the Police and Crime Plan Priorities**

9.1 None directly identified because of this report.

## **10. Changes in Legislation or other Legal Considerations**

10.1 None which affects the content of this report.

## **11. Details of outcome of consultation**

11.1 The Chief Constable has been consulted on this report. Nottinghamshire Police are proactively examining the recommendations, providing early assurance that they are committed to driving ongoing improvement.

## **12. Appendices**

NA

## **13. Background Papers (relevant for Police and Crime Panel Only)**

- A) Inspection of Vetting, Misconduct & Misogyny in the Police Service.
- B) A report into the effectiveness of vetting & counter corruption arrangements in Nottinghamshire.

For any enquiries about this report please contact:

Sharon Caddell, Chief Executive and Monitoring Officer of the Nottinghamshire Office of the Police and Crime Commissioner, Tel: 0115 8445998

Dan Howitt, Head of Strategy and Performance of the Nottinghamshire Office of the Police and Crime Commissioner, [ExecutiveSupport@notts.police.uk](mailto:ExecutiveSupport@notts.police.uk), Tel: 0115 8445998