



Office of the Police and Crime

Commissioner

PO Box 688

PE29 9LA

Tel: 0300 333 3456

Email: Cambs-pcc@cambs.police.uk

Twitter: [@PCCCambs](https://twitter.com/PCCCambs)

Rt Hon Suella Braverman KC MP
Home Secretary
2 Marsham Street
London
SW1P 4DF

23rd December 2022

Dear Home Secretary

HMICFRS Report: An inspection of vetting, misconduct, and misogyny in the police service.

Under Section 55(5) of the Police Act 1996, as Police and Crime Commissioner I am pleased to provide my formal response to the report by HMICFRS entitled 'An inspection of vetting, misconduct, and misogyny in the police service.'

Both the Chief Constable and I welcome the publication of this report.

The Chief Constable's response to the recommendations is shown at Appendix 1.

I welcome the Chief Constable's response to the 43 recommendations and the five areas for improvement identified within the report. Cambridgeshire Constabulary abide by four core values to deliver an inclusive and professional policing service. They are Fairness, Integrity, Diligence and Impartiality.

Underpinning these is the Constabulary's focus on culture in policing and they have developed a culture statement which sets the behaviour expected of officers and staff and reinforces the Constabulary's commitment towards creating an inclusive working environment and building trust and confidence in one another and our communities. Included within this is the critical role the Constabulary play in ending violence against women and girls and I am pleased to say that they are committed to responding unequivocally to allegations of police perpetrated abuse and challenging and addressing sexism and misogyny in policing. The public expect and deserve to have trust and confidence in their police service, just as officers and staff deserve to have trust in their colleagues. Misogyny, prejudicial, and improper behaviour will not be tolerated. Such behaviour represents a fundamental betrayal of police service values.

The Constabulary is part of a well-established tri-force collaboration with Bedfordshire Police and Hertfordshire Constabulary. This collaboration provides a range of shared operational and specialist capabilities, including a collaborated Professional Standards Department (PSD). PSD's services comprise of Investigations (public complaints, conduct, crime), Anti-Corruption, Prevent, Vetting, Complaint Handling, Independent Office for Police Conduct (IOPC) Liaison, Ethics, Learning, Analytics, and Administration. PSD are committed to maintaining and improving public confidence and quality of service across the three forces.

When I was elected Police and Crime Commissioner, I made a commitment to ensure that the police act with integrity and social responsibility, promoting a culture that is inclusive, diverse and takes equality seriously. My Ethical policing theme was one of five themes developed to support the promises and commitment I made to tackle crime and keep communities safe. This is outlined within my Police and Crime Plan 2021 to 2024. I am pleased to say that the response from the Chief Constable provides me with the necessary assurance that they continue to deliver against my Plan.

I too would also like to reassure you and the communities of Peterborough and Cambridgeshire, that I will continue to hold the Chief Constable to account for ensuring that officers and staff carry out their roles in line with the standards of

professional behaviour expected of all those within policing. I will also continue to hold the Chief Constable to account for his equality and diversity duty and how this is embedded within the Constabulary to ensure the workforce is representative of the communities it serves. That includes monitoring the progress being made against the recommendations and areas for improvement contained within this report.

I hope this response, and that of the Chief Constable, provides reassurance regarding the commitment of both myself and Cambridgeshire Constabulary to tackling misconduct and misogyny within the police force.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Darryl Preston', written over a light grey rectangular background.

Darryl Preston

Police and Crime Commissioner for Cambridgeshire and Peterborough

Enc - Appendix 1 – Cambridgeshire Constabulary’s response to HMICFRS report
‘An inspection of vetting, misconduct, and misogyny in the police service.’

Cambridgeshire Constabulary's response to HMICFRS report 'An inspection of vetting, misconduct, and misogyny in the police service.'

Recommendations:

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.

Force response: This recommendation is addressed to the College of Policing in the first instance. The force will await updated guidance on the minimum standard of pre-employment checks.

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.

Force response: This recommendation is accepted. BCH PSD are working to improve processes to identify applicable vetting clearance cases and flag such cases on the vetting management system.

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 the risk mitigation strategy are clearly defined; and there is robust oversight.

Force response: This recommendation is accepted. BCH PSD, together with the collaborated BCH Human Resources (HR) department, have established processes and governance in place to manage the risk and associated mitigation measures where vetting clearance is granted to applicants where adverse information has been identified.

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.

Force response: This recommendation is accepted. BCH vetting decision rationales are made and recorded in accordance with the National Decision Model (NDM) and the College of Policing Vetting Authorised Professional Practice.

5. By 31 October 2023, the College of Policing, working with the lead for vetting, should change the Vetting Authorised Professional Practice, to give improved clarity in relation to: a greater focus on protecting the public; mitigation factors that may be employed; the weight to be applied to adverse information found on social media; and an obligation to record sufficiently detailed rationale, noting all identified risks and taking full account of all relevant factors, when coming to a vetting decision.

Force response: This recommendation is addressed to the College of Policing and the National Police Chiefs' Council (NPCC) lead for vetting.

6. By 31 October 2023, the College of Policing, working with the National Police Chiefs' Council lead for vetting, should include a vetting decision-making

template within the Vetting Authorised Professional Practice, to standardise decision-making.

Force response: This recommendation is addressed to the College of Policing and the NPCC lead for vetting.

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.

Force response: This recommendation is accepted. BCH PSD have governance processes in place to review vetting decisions and take subsequent action where necessary. All vetting clearance decisions where adverse information has been identified are ratified by the Head of the Anti-Corruption Unit prior to approval. Vetting rejection decisions are authorised by Vetting Supervisors. BCH PSD will continue to develop its quality assurance mechanisms.

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.

Force response: This recommendation is accepted. BCH PSD regularly analyse vetting decisions in relation to applicants' ethnicity to understand any disproportionality. This will be extended to monitor the impact of decisions on other protected characteristics.

9. By 31 October 2023, the College of Policing, working with the National Police Chiefs' Council lead for vetting, should change the Vetting Authorised Professional Practice to include guidance for dealing with vetting appeals. This should include specific guidance concerning the composition and role of vetting panels. The guidance should be consistent with the Vetting Code of Practice,

particularly in relation to decision-making responsibilities and the involvement of HR professionals.

Force response: This recommendation is addressed to the College of Policing and the NPCC lead for vetting.

10. By 31 October 2023, the College of Policing, working with the National Police Chiefs' Council lead for vetting, should change the Vetting Authorised Professional Practice to make it clear that, if an officer is reduced in rank following misconduct proceedings, forces should review their suitability to keep their current level of vetting clearance.

Force response: This recommendation is addressed to the College of Policing and the NPCC lead for vetting.

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.

Force response: This recommendation is accepted. There is a policy and standard operating procedure in place between BCH PSD and BCH HR to review vetting clearance for officers following misconduct proceedings.

12. By 31 October 2023, the College of Policing, working with the National Police Chiefs' Council lead for vetting, should change the Vetting Authorised Professional Practice to be more prescriptive about what types of roles require management vetting, and give guidance on how people working with vulnerable individuals are vetted. This should include an emphasis on roles that specifically involve working closely with vulnerable people.

Force response: This recommendation is addressed to the College of Policing and the NPCC lead for vetting.

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.

Force response: This recommendation is accepted. BCH already holds a designated post list and those with insufficient vetting are known and subject to regular review. Vetting to the required level is undertaken on a risk and prioritisation basis. An uplift in vetting resources to enable all required re-vetting to be undertaken has been agreed. However, vetting resource is currently prioritised to delivery of the police uplift programme, with minimal capacity for re-vetting until at least April 2023. In addition, temporary funding specifically agreed to address the backlog in required re-vets has recently been withdrawn.

14. By 31 October 2023, the College of Policing, in consultation with the National Police Chiefs' Council lead for vetting, should change the Vetting Authorised Professional Practice to prescribe intervals substantially shorter than ten and seven years for the renewal of recruitment vetting and management vetting respectively.

Force response: This recommendation is addressed to the College of Policing and the NPCC lead for vetting.

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.

Force response: This recommendation is accepted. The BCH PSD control strategy contains educational priorities. These focus on common issues where there is a need to improve the awareness of all employees, this includes the requirement to report any changes to circumstances. All officers and staff are also reminded in their annual Integrity Health Check completed alongside their Performance Development Review (PDR) appraisal. BCH PSD will continue to reinforce this messaging.

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. To help this, the College of Policing should: working with the National Police Chiefs' Council lead for counter-corruption, change the Counter-Corruption (Intelligence) APP to include a requirement for the PND to be used in this way; and change the PND Code of Practice (and any subsequent code of practice concerning the Law Enforcement Data System) to include a specific provision that allows for the PND to be used in this way.

Force response: This recommendation is accepted. National support is required to enable the routine use of the Police National Database (PND) in this way. In the interim, BCH PSD are undertaking work at a local level to implement the routine checking of workforce data against the Athena crime management system. BCH PSD also use PND checks as part of the risk management process for the prioritisation of vetting renewals.

17. By 31 October 2023, the College of Policing, working with the National Police Chiefs' Council lead for vetting, should change the Vetting Authorised Professional Practice to give guidance that: in every case where a transferee is refused vetting clearance, the originating force should carry out its own review of

the individual's vetting status; and the two forces involved exchange relevant information about the reasons for the refusal decision.

Force response: This recommendation is addressed to the College of Policing and the NPCC lead for vetting.

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.

Force response: This recommendation is accepted. A BCH Reporting Concerns (Whistleblowing) policy is in place to ensure that reports of wrongdoing are appropriately investigated, and appropriate support is in place for all individuals affected. The approach to criminal allegations has recently been reviewed and strengthened to ensure there is a robust response. BCH also hold the wellbeing of the workforce as a high priority and it is essential that whilst investigations take place without fear or favour, PSD also recognise, assess, and try to minimise the impact on individuals as much as possible. Guidance has recently been issued outlining the support available to victims, witnesses, and subject officers and staff involved in criminal, PSD or IOPC investigations or police staff disciplinary procedures.

19. By 31 October 2023, the Home Office, working with the National Police Chiefs' Council lead for complaints and misconduct, and the Independent Office for Police Conduct, should make sure that police officers who make criminal allegations against other members of their own force are afforded rights similar to those held by members of the public who make criminal allegations. These should include: the right to complain about the conduct of officers concerned with the handling of the allegation, including its recording and investigation; and the right to appeal against the outcome of such a complaint.

Force response: This recommendation is addressed to the Home Office, the NPCC lead for complaints and misconduct, and the IOPC.

20. By 30 April 2023, chief constables should adopt the National Police Chiefs' Council sexual harassment policy.

Force response: This recommendation is accepted. The BCH Sexual Harassment Policy was published this year and was developed in line with the NPCC policy.

21. By 30 April 2023, the College of Policing, working with the National Police Chiefs' Council lead for ethics and integrity, should extend the scope of the Appropriate personal relationships and behaviours in the workplace guidance. An amended version should include guidance in relation to non-consensual behaviours as well as consensual relationships.

Force response: This recommendation is addressed to the College of Policing and the NPCC lead for ethics and integrity.

22. By 30 April 2023, the National Police Chiefs' Council and the College of Policing, in consultation with the Independent Office for Police Conduct, should define prejudicial and improper behaviour, using the definition contained in this report or a suitable alternative.

Force response: This recommendation is addressed to the NPCC, the College of Policing, and the IOPC.

23. By 31 October 2023, the National Police Chiefs' Council lead for complaints and misconduct, in consultation with the relevant IT provider and the Independent Office for Police Conduct, should arrange to add a prejudicial and improper behaviour identifier flag to the professional standards database used to record complaints and misconduct.

Force response: This recommendation is addressed to the NPCC lead for complaints and misconduct, the relevant IT provider, and the IOPC.

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.

Force response: This recommendation is accepted. This recommendation is dependent on the outcome of recommendation 23. However, at a local level, BCH PSD already have processes in place to flag sexual misconduct, violence against women and girls, and discriminatory behaviour on all relevant cases.

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.

Force response: This recommendation is accepted. BCH PSD routinely carry out wider inquiries when investigating reports of prejudicial and improper behaviour, and in counter-corruption intelligence development. These inquiries go beyond the areas suggested in this recommendation and include the use of analytics to both prevent risk and review department and divisional cultures following such cases, with action where necessary. These processes are overseen by investigation standards and counter-corruption governance arrangements.

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.

Force response: This recommendation is accepted. BCH PSD use investigation plans for investigations and counter-corruption intelligence development. The plans are set by supervisors and are subject to regular reviews to ensure compliance. This forms part of the investigation quality governance framework.

27. By 30 April 2023, the National Police Chiefs' Council lead for complaints and misconduct should design a sampling regime for appropriate authorities' decisions. This is to quality assure the decisions and identify any learning. The sampling should make sure that appropriate authorities' decisions: are consistent; maintain public confidence in, and the reputation of, the police service; uphold high standards in policing and deter misconduct; and protect the public.

Force response: This recommendation is addressed to the NPCC lead for complaints and misconduct.

28. By 30 April 2023, in the forces where we 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 our next round of inspections of professional standards departments.

Force response: This recommendation is not applicable for BCH. BCH PSD were involved in the fieldwork for this inspection. One hundred and sixty cases were scrutinised by HMICFRS, resulting in minor recommendations

in just four cases. BCH hold the wellbeing of the workforce as a high priority and guidance has recently been issued outlining the support available to victims, witnesses, and subject officers and staff involved in criminal, PSD or IOPC investigations or police staff disciplinary procedures.

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.

Force response: This recommendation is accepted. Regulation 13 is routinely used by BCH HR for officers in their probationary period. Further work is planned to ensure BCH PSD is involved in cases, where necessary, and that it is applied in all appropriate circumstances.

30. By 31 December 2023, the Home Office, working with the National Police Chiefs' Council lead for complaints and misconduct and the College of Policing, should make sure that forces can use Regulation 13 of the Police Regulations 2003 effectively to discharge probationers who don't achieve the required educational or academic standard during their probationary period.

Force response: This recommendation is addressed to the Home Office, the NPCC lead for complaints and misconduct, and the College of Policing.

31. By 31 October 2023, the Home Office, working with the College of Policing and the National Police Chiefs' Council lead for complaints and misconduct, should make sure that, during pre-employment or vetting checks, police forces can identify any applicants previously discharged under Regulation 13 of the Police Regulations 2003.

Force response: This recommendation is addressed to the Home Office, the College of Policing, and the NPCC lead for complaints and misconduct.

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.

Force response: This recommendation is accepted. Sexual misconduct, including abuse of position for a sexual purpose, remains one of BCH PSD's strategic priorities. Risk assessment processes are in place. All intelligence is subject to an initial THRIVE assessment and MoRiLE scoring is used to prioritise cases. High-risk individuals are subject to additional oversight through Operation Foxtrot to tackle corruption and sexual misconduct.

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.

Force response: This recommendation is accepted. BCH PSD has PSD Champions within external partnership agencies that support vulnerable people. The main aim of PSD Champions is to support the development and delivery of corruption prevention awareness, and promote the reporting of issues via appropriate secure, and if required, anonymised routes. Plans are in place to expand this network into other areas such as educational establishments and prisons.

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.

Force response: This recommendation is accepted. A tactical intelligence collection plan is in place that supports the BCH PSD Control Strategy with targeted engagement in risk areas identified through heat mapping. Proactive intelligence collection capabilities are in place within the Anti-Corruption Unit and relationships with key partners enable appropriate sensitive intelligence gathering tactics to be deployed.

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.

Force response: This recommendation is accepted. BCH PSD can monitor use of IT systems across the three forces. Proactive intelligence gathering capabilities have also recently been enhanced through an increase in resources.

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.

Force response: This recommendation is accepted. Attribution of mobile devices to the workforce is generally good and processes are in place to monitor usage. Work is ongoing in BCH PSD and the collaborated BCH ICT department to ensure that accurate records are held for all mobile devices.

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.

Force response: This recommendation is accepted. There are established joint working processes between BCH PSD and BCH HR to discuss people matters. Development of a formal 'people intelligence meeting' to exchange corruption-related information and intelligence is in progress.

38. By 30 April 2023, 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).

Force response: This recommendation is accepted. Corruption intelligence is categorised in accordance with the national Authorised Professional Practice on Counter-Corruption (Intelligence).

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.

Force response: This recommendation is accepted. BCH PSD produce an annual counter-corruption strategic threat assessment in accordance with the Counter-Corruption (Intelligence) Authorised Professional Practice. The threat assessment informs production of an annual control strategy setting out strategic priorities, intelligence requirements, and educational priorities.

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.

Force response: This recommendation is accepted. Investigation plans are set for BCH PSD counter-corruption investigations and intelligence

development. Compliance is monitored through regular supervisory reviews and an investigation quality governance framework.

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.

Force response: This recommendation is accepted. BCH have a Business Interest and Secondary Employment Procedure to ensure business interests are recorded and reviewed. Work is ongoing within BCH PSD to improve supervisors' awareness and the monitoring of refused applications.

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.

Force response: This recommendation is accepted. BCH have a Reportable Notifiable Procedure to prevent corruption and the opportunity for corruption by identifying associations that may have an adverse effect on the ability of members of the workforce to carry out their duties in accordance with the Code of Ethics. The procedure is compliant with the Counter-Corruption (Prevention) Authorised Professional Practice. Work is ongoing within BCH PSD to improve monitoring processes and increase supervisors' awareness.

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.

Force response: This recommendation is accepted. Annual Integrity Health Checks are completed alongside Performance Development Review (PDR) appraisals. The health check is designed to remind the workforce of areas which may be exploited as a vulnerability including notifiable and reportable associations, gifts and hospitality, business interests, criminal proceedings or convictions, and changes in circumstances.

Areas 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.

Force response: This area for improvement is accepted. Vetting interviews and other forms of engagement are routinely used in BCH PSD to elicit further information from applicants and clarify issues when required. All contact is recorded in the vetting management system.

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.

Force response: This area for improvement is accepted. BCH do not currently have integrated vetting and HR systems. It is anticipated that the introduction of a new recruitment system will deliver improvements in this area. However, whilst not automated, there is an established process in

place between BCH PSD and BCH HR for the notification of joiners, internal moves, and leavers.

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.

Force response: This area for improvement is accepted. BCH PSD monitor the levels of reporting in relation to misogynistic, prejudicial, and improper behaviour towards female members of the workforce through quarterly violence against women and girls (VAWG) performance reviews. A wider understanding of this behaviour is also sought through a PSD survey.

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.

Force response: This area for improvement is accepted. BCH PSD has recording guidelines which clearly define abuse of position for a sexual purpose (AoPSP). Compliance will be reviewed, and regular checks will be introduced to ensure AoPSP is accurately recorded.

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.

Force response: This area for improvement is accepted. The BCH PSD Control Strategy is set each year following completion of the strategic threat assessment. The control strategy is published and shared with the workforce. Information on corruption threats is also communicated through Prevent engagement activity across the forces, targeted Prevent plans for

high-risk areas, and a quarterly newsletter covering the standards of professional behaviour and how to counter corruption.