

UNDER EMBARGO UNTIL 00.01 ON THURSDAY 17 NOVEMBER 2022



A report into the effectiveness of vetting and counter-corruption arrangements in Thames Valley Police

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About us

His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) independently assesses the effectiveness and efficiency of police forces and fire and rescue services, in the public interest. In preparing our reports, we ask the questions the public would ask and publish the answers in an accessible form. We use our expertise to interpret the evidence and make recommendations for improvement.

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1. Introduction

Vetting, IT monitoring and counter-corruption: no graded judgment

In September 2021, HMICFRS changed the way it reports on how effectively police forces manage vetting and counter-corruption.

Previously, we inspected these areas as part of our [police effectiveness, efficiency and legitimacy \(PEEL\)](#) programme and provided our findings in the inspection report.

The new arrangements mean we will inspect each force separately to PEEL, although we will continue to use the same methods and produce a report containing our findings, graded judgments and any areas for improvement or causes of concern. The report will be accessible via a web link from the most recent force PEEL report.

In July 2021, we inspected Thames Valley Police to examine the effectiveness of its vetting processes, IT monitoring and counter-corruption. Senior officers in the force were briefed at the end of the inspection.

This report publishes our findings. As our inspection took place more than 12 months ago, we provide no graded judgment on this area. The report includes areas for improvement identified during the inspection, but we recognise that the force may have addressed some or all of them.

2. How effectively does the force vet its officers and staff?

We found that Thames Valley Police has a vetting management IT system, but this system didn't link to its human resources (HR) system. As a result, it was not possible to automate the notification process between the [force vetting unit \(FVU\)](#) and HR teams for individuals leaving, joining, or moving within the organisation. It had to be done manually. We found that workforce numbers varied between the two systems. The force was considering using an alternative system designed to standardise the data between the systems, but had no active plans to procure it. This means the FVU could be unaware of the movement of personnel within the force and the HR team potentially unaware of individuals' vetting clearance. This is a risk for the force.

The force's vetting data return in May 2021 identified 309 cases where vetting had expired and was awaiting renewal. Senior FVU officers told us this had been reduced to 120 cases, indicating a good level of progress. However, we didn't see documentation showing this reduction.

During our last inspection, the force had not vetted a large number of officers to the minimum level required. This was raised as a cause of concern. Since then the force had undertaken a programme of work in two phases. Phase one focused on reducing the numbers of officers without vetting, which at the time of our inspection had been completed. Phase two focused on cases requiring vetting renewal. The final report on both phases of the work was due in September 2022.

We were concerned that on publication of this work, the force would have assurance as a snapshot in time. It was unclear how the force proposed to maintain an adequate grip of its vetting workload beyond this point.

We reviewed a small number of dip-samples of officers at the enhanced [management vetting](#) level and found all were vetted to the correct level. However, our review identified that the FVU did not comply with several areas of the [Authorised Professional Practice \(APP\)](#) on vetting, for instance conducting inquiries on family members and associates. This had been a conscious decision based on managing workload and demand. The FVU had created an 'APP gap analysis', which it intended to share with chief officers, but no date was planned for this.

Our inspection found Thames Valley Police has a good relationship with staff associations. It has a process in place to deal with identified disproportionality that

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may arise through the vetting process. However, we saw no evidence of analysis of potential disproportionality. For example, the force doesn't analyse the proportion of rejections for applicants with a particular protected characteristic compared to a control group without that protected characteristic. As a result, the force has no means of understanding the reasons for any disproportionality and therefore no action is being taken to address it. We have identified this as an area for improvement.

In our 2018/19 report [*PEEL: Police effectiveness, efficiency and legitimacy – An inspection of Thames Valley Police*](#) report, we identified the size of its vetting backlog as a cause of concern. We recommended that:

“The force should make sure that all staff have received at least the lowest level of vetting clearance for their roles as quickly as possible.

The force should work to clear both the vetting backlog and new vetting renewals when they become due, so that it is fully compliant with the national vetting guidelines.”

In our 2019 PEEL spotlight report [*Shining a light on betrayal: Abuse of position for a sexual purpose*](#) we made a national recommendation:

“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.”

Despite these recommendations, Thames Valley Police had not made sufficient progress to improve the management of its vetting. This was despite both a verbal update and a demonstration of the vetting IT systems. Accordingly, we identify this as an area for improvement.

Areas for improvement

- The force should improve how it manages the vetting of its workforce to make sure that post holders have valid vetting clearance for the role undertaken.
- The force should introduce a system to monitor and respond to disproportionality in its vetting decisions.

3. How effectively does the force protect the information and data it holds?

Our inspection found that Thames Valley Police has the capability to monitor all its IT systems across handheld, mobile and desktop devices. For example, it reviewed the top 50 call lists on mobile devices against numbers identified for vulnerable victims and [organised crime groups](#). The force has an IT monitoring policy with associated guidance for both passive and targeted monitoring. During our review of 60 items of potential corruption intelligence, we saw effective use of the IT monitoring software.

The force recognises the risk associated with the use of [encrypted apps](#) on force devices and doesn't allow their use.

Based on the demands and workload of the counter-corruption unit (CCU), supported by temporary additional personnel, the force had sufficient resources to use the IT monitoring software. It had plans to add two further members of staff.

4. How well does the force tackle potential corruption?

We found that Thames Valley Police has a counter-corruption [strategic threat assessment \(STA\)](#), but not of the required standard. There was a lack of analytical data and evidence to support the reasons why a corruption category was identified as a current threat. There was limited mention of how the STA linked to national priorities and regional threat assessments. We found the STA was only a statistical overview of the volume of intelligence received in the CCU and saw little evidence of any in-depth analysis of the information and the emerging threats.

Nevertheless, the force had produced a [control strategy](#) incorporating a plan with named individuals responsible for completing the actions necessary, and following the [4Ps](#) approach (pursue, prepare, protect, prevent). Both documents were reviewed every three months.

The force uses 60-second videos, intranet communication and briefings to illustrate corruption risks and raise awareness among its workforce.

Of the 60 potential corruption intelligence cases we reviewed, we found that many were not categorised correctly in accordance with national counter-corruption guidelines.

We found that the CCU thoroughly reviewed each of these cases, developed the intelligence, and investigated where necessary. We found no cases where the unit prematurely filed intelligence with outstanding lines of inquiry. There were a small number of cases that should have been referred to the Independent Office for Police Conduct, but were not. The force will need to tighten its referral procedures.

The force has an [abuse of position for a sexual purpose](#) risk matrix completed in all cases involving sexual misconduct or sexual harassment. It treats sexual misconduct cases seriously. The CCU had engaged with several external organisations who support vulnerable victims, providing training that highlights potential risks and warning signs.

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In our 2018/19 report *PEEL: Police effectiveness, efficiency and legitimacy – An inspection of Thames Valley Police* we identified as an area for improvement:

“The force should ensure the anti-corruption Strategic Threat Assessment and Control Strategy are of a good quality, up to date and include current data.”

Similarly in our 2019 PEEL spotlight report *Shining a light on betrayal: Abuse of position for a sexual purpose* we made a national recommendation:

“By April 2020, all forces that haven’t yet done so should record corruption using the national corruption categories and; produce a comprehensive annual counter-corruption strategic threat assessment, in line with the authorised professional practice.”

Despite these previous findings, the force has made insufficient progress to improve the quality of its counter-corruption STA. We strongly urge the force to do so.

Similarly, the force should record corruption intelligence using nationally agreed categories. Accordingly, we identify this as a continued area for improvement.

Area for improvement

The counter-corruption unit should ensure that intelligence is categorised in accordance with the Authorised Professional Practice on counter-corruption (intelligence).

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