

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

11 May 2023

Dear Home Secretary,

Vetting, misconduct and misogyny in the police service: review of progress

I write in response to your letter dated 18 January 2023. As requested, we have undertaken an urgent review of the progress police forces in England and Wales have made to address the 43 recommendations and 5 areas for improvement in [our report](#). We set a range of deadlines for our recommendations to be addressed.

We have examined the self-assessments that forces provided to the [National Police Chiefs' Council \(NPCC\)](#) and considered whether they accurately reflect the grading each force has given itself. Forces and the NPCC worked quickly to provide these self-assessments. To varying degrees, they offer assurance that the recommendations are being acted upon. But some responses weren't detailed enough, and a few forces appeared to have either downplayed or overstated their progress in some areas. In some of these cases, we made enquiries to verify or refute the information in their self-assessments. This has helped us to establish a more accurate and informed picture of progress.

We also asked other bodies – the [Independent Office for Police Conduct](#), [College of Policing \(CoP\)](#), Home Office and NPCC – to report their progress in meeting our recommendations.

This letter summarises our main findings. I have attached an [annex](#) that sets out our findings in more detail. My conclusion is that there have undoubtedly been some improvements since our inspection, but not all forces can demonstrate acceptable progress on some recommendations. Moreover, while vetting appears to have been tightened, there are still some cases likely to cause concern. Examples are in the annex.

Summary of forces' progress: vetting

In our report, we made 9 vetting-related recommendations to each of the 43 police forces in England and Wales – a total of 387 recommendations. **Cautiously, we estimate that 73 percent have been or are likely to be addressed by the deadline.** More specifically:

- Three recommendations are likely to be achieved by at least 90 percent of forces. These relate to vetting decision-making, vetting reviews after misconduct proceedings and routine use of the [Police National Database](#) to monitor the workforce.
- Four recommendations are likely to be achieved by about 70 percent of forces. These relate to identifying vetting clearance decisions with adverse information within IT systems, quality assurance processes, analysing data to identify any disproportionality and managing changes to individuals' personal circumstances.
- Two recommendations are likely to be achieved by less than 50 percent of forces. These relate to the use of risk mitigation and ensuring that all people in [designated posts](#) have [management vetting](#).

To help us assess forces' efforts to address our recommendations, we examined 300 vetting files that forces handled between 1 December 2022 and 31 January 2023. Encouragingly, we found notable improvements in vetting decision-making since our thematic inspection. Nevertheless, while forces have become less likely to give clearance to unsuitable applicants, we still found 13 cases of concern. These included cases where the applicant had:

- a connection with an [organised crime group](#);
- a history of allegations of domestic abuse against several partners;
- a history of allegations of dishonesty (including a criminal charge);
- unexplained debts; or
- deliberately omitted significant information from their vetting application form.

They also included cases where the applicant had a family member who had been imprisoned for:

- drug dealing; or
- serious sexual offences and was now a registered sex offender.

In all 13 cases, we disagreed with the vetting decisions. We weren't satisfied that the forces involved had adequately considered the risks associated with appointing the applicants. We were left with substantial questions about the wisdom of appointing them. We informed the forces of our concerns. We have since been made aware that in at least three cases, the force withdrew or suspended the vetting clearance.

In a further 26 cases, we agreed with the vetting decisions but found that forces hadn't adequately recorded their rationale for granting clearance.

Vetting recommendations to other bodies

We made eight vetting-related recommendations to other bodies. We are told that six of them are on track to be addressed by the deadline. The CoP expressed reservations about the remaining two.

The first relates to increasing the frequency of vetting renewals. The CoP suggested that without a significant increase in [vetting unit](#) staff nationally, this recommendation would recreate the huge numbers of [police personnel](#) with expired vetting that we found in the past. The CoP estimates that 1.2 million hours and an additional 800 vetting staff would be needed to renew existing vetting clearances. Inevitably, increasing the frequency of vetting will increase workloads, but we have been unable to verify the CoP's estimate.

The CoP also expressed reservations about meeting the deadline for changing the vetting [authorised professional practice](#). We recommended that it should be more prescriptive about what types of roles require management vetting and give better guidance on the vetting of police personnel working with [vulnerable people](#). We recognise the complexity of this work and are satisfied the CoP and NPCC are working towards addressing the recommendation.

Summary of forces' progress: counter-corruption and misconduct

In our report, we made 19 recommendations related to counter-corruption and misconduct to each of the 43 police forces in England and Wales – a total of 817 recommendations.

With a reasonable degree of confidence, we estimate that at least 90 percent have been or are likely to be addressed by the deadline. More specifically:

- Eighteen recommendations are likely to be addressed by at least 90 percent of forces. Two of these recommendations aim to increase forces' understanding of misogynistic and predatory behaviour. Four seek to improve the collection of corruption intelligence. Eight aim to introduce better processes to manage corruption risks. Four are designed to improve the way that forces assess and investigate allegations of misconduct.
- One recommendation is likely to be addressed by only about 60 percent of forces. This was for chief constables to review allegations of prejudicial and improper behaviour (PIB) recorded in the previous three years.

To help us assess forces' efforts to address our recommendations, we examined 149 recent PIB misconduct files and 80 sexual misconduct intelligence files. We found that contrary to the update they provided to the NPCC, four forces weren't routinely using investigation plans to properly manage these cases. We found a lack of supervisory oversight in these investigations. Five forces were still not thoroughly investigating PIB.

On a more positive note, we found that [appropriate authorities](#) were making better initial assessments of the severity of allegations, supported by sound written rationales. This led to forces identifying more cases of gross misconduct from the outset. We also found improvements in the way that forces collected corruption-related intelligence.

Counter-corruption and misconduct recommendations to other bodies

To other bodies, we made seven recommendations related to counter-corruption and misconduct. Four are likely to be addressed by the deadline. These seek to improve guidance to forces on personal relationships and behaviours in the workplace. The remaining three aim to extend the scope of the law relating to police complaint and misconduct procedures. Understandably, these legislative changes will take more time.

Areas for further inspection

The areas that would merit further inspection are:

- vetting decisions, accompanying rationale and use of risk mitigation measures;
- reviews of vetting status when personal circumstances change or after misconduct proceedings;
- designated post lists and management vetting arrangements;
- identifying, understanding and responding to disproportionality in vetting decisions;
- investigation and management of PIB cases (both intelligence and misconduct);
- results of the review of investigations into allegations relating to PIB recorded in the past three years; and
- forces' understanding of the scale of misogynistic or other improper behaviour towards women in the workplace.

If you or your officials would like a more detailed briefing, I would be very happy to provide it. I have copied this letter and attachment to the relevant NPCC leads.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'MP' followed by a stylized flourish.

Matt Parr CB

His Majesty's Inspector of Constabulary

His Majesty's Inspector of Fire & Rescue Services