



OPCC

Office of the Police &
Crime Commissioner
for Gloucestershire

December 2022

Response to the national HMICFRS inspection into vetting, misconduct, and misogyny in the police service

The report found [here](#) was a national report involving the inspection of eight forces, commissioned in 2021 by the then Home Secretary, to assess current vetting and counter-corruption arrangements in policing across England and Wales which was to include forces' ability to detect and deal with misogynistic and predatory behaviour.

Although Gloucestershire was not one of the forces chosen to be inspected we very much value the work carried out by HMICFRS into this extremely important area and welcome the spotlight on violence against women and girls.

I am happy with the response from Gloucestershire Constabulary to the recommendations in the report, and will seek ongoing assurance with regards to progress made in the identified areas.

Chris Nelson

Gloucestershire Police and Crime Commissioner



To Ruth Greenwood
Chief Exec to OPCC

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Direct

Dial: 01452 752334

Date: 20.12.2022

Dear Ruth,

Re: Response to HMICFRS report on vetting, misconduct, and misogyny in the police service

I write in response to the above HMICFRS report and your requirement to comply with Section 55(1) of the Police Act 1996. This letter, and in particular the attached table, contains detail of the recommendations outlined in the report with corresponding reference to the work the constabulary has, or will, undertake.

The report is a national report and Gloucestershire Constabulary was not one of the eight forces inspected. The report concluded that police vetting standards are not high enough and it is too easy for the wrong people to both join and stay in the police service. There are 43 recommendations for both the police service and other agencies, an assessment of Constabulary activity has been included in the attached table. The recommendations for other agencies has been included for reference, however do not require individual forces to implement changes at this time, and the outcome will be monitored for any subsequent impact or implementation.

You will see that a number of the recommendations are already a part of standard working practices within the Professional Standards Department (PSD). Where further work is required an Implementation Plan has been developed and, where necessary this also includes consultation with other Constabulary departments to ensure appropriate progression.

However, the 43 recommendations place a much greater onus on PSD and Vetting departments. If, as seems likely, these recommendations are adopted by the College of Policing and the NPCC it will almost certainly result in revisions to the Approved Professional Practice (APP). The recommendations are such that they will place a significant increased demand on PSD and Vetting departments. The consequential demand will only be addressed by an uplift in resources within our PSD and Vetting departments to ensure APP compliance. This has been identified as an issue and an uplift paper to increase Vetting staff has been submitted and is due for consideration in January 2023.

We are committed to being an anti-discriminatory organisation. This means not only acting in a non-discriminatory way, but addressing systemic inequalities, disadvantage and discrimination



Please do not hesitate to contact me should you require any further information.
Yours sincerely

Richard Ocone
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Version number:	1.0
Date issued:	Not applicable

An inspection of vetting, misconduct, and misogyny in the police service

Recommendations - updating minimum standards for pre-employment checks

HMICFRS	Owner	Timescale	Progress
Recommendation 1: 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.	D/Supt PSD/ACU & Vetting	By 31 October 2023	11/12/2022 The minimum pre-employment checks currently form the Gloucestershire Constabulary standard and the Professional Standards Department (PSD) will adopt these following the revision by the College of Policing when they are released. In order to do this further consultation with the HR/recruitment Department is needed to ensure the recommendation is fully met.

Recommendations - establishing better processes for assessing, analysing, and managing risks relating to vetting decisions, corruption investigations and information security

HMICFRS	Owner	Timescale	Progress
Recommendation 2 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.	D/Supt PSD/ACU & Vetting	By 30 April 2023	11/12/2022 Constabulary PSD databases already hold this information. Development work to be undertaken to ensure that it the information is more easily accessible.
Recommendation 3 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.	D/Supt PSD/ACU & Vetting	By 30 April 2023	11/12/2022 The Constabulary PSD already adheres to these principles. However, capacity within the current resources has been identified as an issue and an uplift paper to increase vetting staff has been submitted and is due for consideration January 2023. If successful this will make demand manageable.

HMICFRS	Owner	Timescale	Progress
Recommendation 11 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.	D/Supt PSD/ACU & Vetting	By 30 April 2023	11/12/2022 This is a normal working practice for the Constabulary.
Recommendation 13 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.	D/Supt PSD/ACU & Vetting	By 31 October 2023	11/12/2022 Consideration of this recommendation has identified that a review is required and the subsequent outcomes presented and progressed. There will be resourcing implications associated with undertaking the review, and this recommendation will be included for scheduling in the PSD Improvement Plan.

HMICFRS	Owner	Timescale	Progress
Recommendation 15 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 all police officers and staff are made aware of the requirement to report any changes to their personal circumstances;	D/Supt PSD/ACU & Vetting	By 30 April 2023	11/12/2022 Previous entries covering this topic have been included in the Force Bulletin and awareness sessions have been presented by the Vetting Team covering the issues and action to be taken by staff following a change in circumstances. A further refreshed communication campaign will take place in the New Year. Processes prompting a review of any notified change in circumstances are already in place. Providing members of the Constabulary inform the Vetting Department of a change in circumstances other key parts of the organisation, for example the Anti-Corruption Unit, who may need to know about the change have that information available to them.
Recommendation 16 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.	D/Supt PSD/ACU & Vetting	By 31 December 2023	11/12/2022 The Constabulary already utilise the Police National Database in this way.

HMICFRS	Owner	Timescale	Progress
Recommendation 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.	D/Supt PSD/ACU & Vetting	With immediate effect	11/12/2022 Consideration of this recommendation has identified that further clarification of this recommendation is required and the Head of PSD is currently progressing this. The use of Regulation 13 has been used by the Constabulary and further consultation will take place with Learning & Development and HR departments to ensure that practices surrounding its use are in line with this report once clarified.
Recommendation 31 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.	D/Supt PSD/ACU & Vetting	By 31 October 2023	11/12/2022 The Constabulary already check for such markers.

HMICFRS	Owner	Timescale	Progress
Recommendation 36 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.	Head of ICT/ D/Supt PSD/ACU & Vetting	By 30 April 2023	11/12/2022 The Head of PSD will liaise with the Head of ICT as this is not a function for PSD. This recommendation will be included for scheduling in the PSD Improvement Plan.
Recommendation 37 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.	D/Supt PSD/ACU & Vetting /Head of HR	By 30 April 2023	11/12/2022 The PSD already hold these meetings for active cases and HR are, when appropriate, a participant. Consideration of this recommendation has identified that an increase in proactive activity between the department and HR would be beneficial and this recommendation will be included for scheduling in the PSD Improvement Plan.

HMICFRS	Owner	Timescale	Progress
Recommendation 38 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).	D/Supt PSD/ACU & Vetting	By 30 April 2023	11/12/2022 The PSD are currently carrying out reassurance work in this area and the outcome will be reported on.
Recommendation 39 Chief constables should make sure they have a current counter-corruption strategic threat assessment, in accordance with the Counter-Corruption (Intelligence) Authorised Professional Practice.	D/Supt PSD/ACU & Vetting	By 30 April 2023	11/12/2022 A Counter Corruption Strategic Threat Assessment, is produced by the Constabulary, which then informs PSD priorities. Liaison with the Constabulary Intelligence Directorate is undertaken to ensure that they are aware of the importance of this piece of work.

HMICFRS	Owner	Timescale	Progress
Recommendation 41 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.	D/Supt PSD/ACU & Vetting	By 30 April 2023	11/12/2022 The PSD manage business interests and the Head of PSD is responsible for authorising them, and carrying out reviews. Consideration of this recommendation has identified that capacity and demand issues are highly relevant to dealing with business interests. For example, currently if a member of staff changes their role new supervisors are not routinely informed about business interests and due to demand/capacity reasons monitoring is not routinely carried out other than at the scheduled review date, which is usually every 2 years. The uplift paper to increase vetting staff that is due for consideration January 2023 would provide the opportunity to develop this area and achieve greater compliance with this recommendation.
Recommendation 42 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.	D/Supt PSD/ACU & Vetting	By 30 April 2023	11/12/2022 Previous entries covering this topic have been included in the Force Bulletin and included information for all staff on the requirement to notify. A further refreshed communication campaign will take place in the New Year. Consideration of this recommendation has identified that capacity and demand issues may result in the development of a triage processes for only prioritised cases to receive extra attention as the 'range of association types' can be wide.

HMICFRS	Owner	Timescale	Progress
Recommendation 43 Chief constables should make sure that a robust process is in place for completing annual integrity reviews for all officers and staff.	D/Supt PSD/ACU & Vetting	By 30 April 2023	11/12/2022 Consideration of this recommendation has identified that further clarification of this recommendation is required and the Head of PSD is currently progressing this. To undertake an annual review on all members of the Constabulary is a substantial undertaking, which current PSD resources would be unable to meet. However, information that is reported to PSD or found by their own proactive work is considered. Similarly, vetting reviews/ and vetting health checks play an important part and these do take place. A further update early in 2023 will be provided and this recommendation will be included for scheduling in the PSD Improvement Plan.

Recommendations - improving the quality and consistency of vetting decision-making, and improving the recording of the rationale for some decisions

HMICFRS	Owner	Timescale	Progress
Recommendation 4 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	D/Supt PSD/ACU & Vetting	By 30 April 2023	11/12/2022 The PSD stringently adhere to the points made and comply with this recommendation.

HMICFRS	Owner	Timescale	Progress
Recommendation 7 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.	D/Supt PSD/ACU & Vetting	By 31 October 2023	11/12/2022 Whilst the PSD and Vetting teams do periodically undertake these types of reviews, the intention is to make this a more formal and regular action. Consideration is also being given to inviting professionals from another Constabulary to carry out a peer review on Gloucestershire cases. This recommendation will be included for scheduling in the PSD Improvement Plan.
Recommendation 8 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.	D/Supt PSD/ACU & Vetting	By 30 April 2023	11/12/2022 The Vetting APP and Codes of Practice already guides the work undertaken by Vetting, and disproportionality represents a key theme that is regularly considered in PSD performance information.

Recommendations - extending the scope of the law relating to police complaint and misconduct procedures

HMICFRS	Owner	Timescale	Progress
Recommendation 19 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.	Home Office /NPCC D/Supt PSD/ACU & Vetting	By 31 October 2023	11/12/2022 The PSD await a direction/ guidance from The Home Office, and NPCC with regards to this recommendation.

HMICFRS	Owner	Timescale	Progress
Recommendation 30 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.	Home Office /NPCC D/Supt PSD/ACU & Vetting	By 31 December 2023	11/12/2022 The PSD await a direction/ guidance from The Home Office, and NPCC with regards to this recommendation.. However, in the meantime the Head of PSD will liaise with the Head of Learning & Development as within the Constabulary this is a L&D responsibility.

Recommendations - strengthening guidance for forces in respect of vetting processes, relationships, and behaviours in the workplace

HMICFRS	Owner	Timescale	Progress
Recommendation 5 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.	Home Office /NPCC D/Supt PSD/ACU & Vetting	By 31 October 2023	11/12/2022 The Vetting APP and Codes of Practice already guides the work undertaken by Vetting and this will remain the case if and when The College of Policing makes changes.
Recommendation 6 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.	CoP /NPCC D/Supt PSD/ACU & Vetting	By 31 October 2023	11/12/2022 The PSD will utilise the template when it is introduced by The College of Policing.

HMICFRS	Owner	Timescale	Progress
Recommendation 9 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.	CoP /NPCC D/Supt PSD/ACU & Vetting	By 31 October 2023	11/12/2022 The PSD await a direction/ guidance from the NPCC with regards to this recommendation. The advice given in the APP is already utilised. Previously advice was taken from the Constabulary's Legal Services department as to the merits of an Appeals Panel. Their advice was that there should be one clearly identified decision maker who is able to call upon and benefit from the advice/ views of others as required. (E.g. a member of The Better Together Team or HR.). This will be revisited in line with any new guidance.
Recommendation 10 The College of Policing, working with the National Police Chiefs' Council lead for vetting, should change the Vetting Authorised Professional Practice to it make 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.	CoP / NPCC	By 31 October 2023	11/12/2022 This is an action for The College of Policing. However, currently where a reduction in rank takes place these reviews are included as a normal part of the working practice in the Constabulary.
Recommendation 12 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.	CoP /NPCC D/Supt PSD/ACU & Vetting	By 31 October 2023	11/12/2022 Any requirements that are stipulated will be incorporated into the working practices of the Constabulary.
Recommendation 14 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.	CoP /NPCC D/Supt PSD/ACU & Vetting	By 31 October 2023	11/12/2022 The Vetting department will incorporate any changes that are required to the intervals prescribed. However, it has been assessed that this will significantly increase the demand on the Vetting Team at their current resourcing levels.

HMICFRS	Owner	Timescale	Progress
Recommendation 17 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.	CoP /NPCC D/Supt PSD/ACU & Vetting	By 31 October 2023	11/12/2022 Any requirements that are stipulated will be incorporated into normal working practice of the Constabulary.
Recommendation 21 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.	CoP /NPCC D/Supt PSD/ACU & Vetting	By 30 April 2023	11/12/2022 The outcome of this guidance is awaited.

Recommendations - understanding and defining what constitutes misogynistic and predatory behaviour in a policing context

HMICFRS	Owner	Timescale	Progress
Recommendation 20 Chief constables should adopt the National Police Chiefs' Council sexual harassment policy.	D/Supt PSD/ACU & Vetting	By 30 April 2023	11/12/2022 The Head of PSD will check upon the current status of this policy within the Constabulary and take any necessary action identified. This recommendation will be included for scheduling in the PSD Improvement Plan.

HMICFRS	Owner	Timescale	Progress
Recommendation 22 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.	NPCC / CoP D/Supt PSD/ACU & Vetting	By 30 April 2023	11/12/2022 The outcome of this work is awaited.
Recommendation 23 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.	NPCC / ICT provider (Centurion)	By 31 October 2023	11/12/2022 The IT system is used by the Constabulary and the outcome of any system change is awaited. PSD staff maintain contact with the provider and are members of a national forum and will therefore be able to seek an update on the progression of changes.
Recommendation 24 Chief constables should make sure their professional standards departments attach a prejudicial and improper behaviour flag to all newly recorded relevant cases.	D/Supt PSD/ACU & Vetting	By 31 October 2023	11/12/2022 This recommendation is dependent on the outcome of recommendation 23. Once completed this can be progressed by the PSD.

Recommendations - improving the way the police collect corruption-related intelligence

HMICFRS	Owner	Timescale	Progress
Recommendation 32 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.	D/Supt PSD/ACU & Vetting	By 30 April 2023	11/12/2022 Robust action of the nature described in the recommendation is already undertaken by the PSD. Guidance will be sought as to what the preferred risk assessment tool is to ensure that the Constabulary's current risk model is aligned.

HMICFRS	Owner	Timescale	Progress
Recommendation 33 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. - 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.	D/Supt PSD/ACU & Vetting	By 31 March 2023	11/12/2022 The PSD have previously engaged with external organisations and have undertaken this work. (e.g. with the Gloucestershire Rape and Sexual Abuse Centre, and Gloucestershire Safeguarding Boards). This work will be refreshed, repeated and further progressed, with the recommendation included for scheduling in the PSD Improvement Plan.
Recommendation 34 Chief constables should make sure that their counter-corruption units actively seek corruption-related intelligence as a matter of routine.	D/Supt PSD/ACU & Vetting	By 30 April 2023	11/12/2022 This activity is already undertaken in the Constabulary.
Recommendation 35 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.	D/Supt PSD/ACU & Vetting	By 31 March 2023	11/12/2022 This capability already exists in the Constabulary, and consideration will be given to a further review to establish if any enhancements can be made.

Recommendations - improving the way police assess and investigate allegations of misconduct.

HMICFRS	Owner	Timescale	Progress
Recommendation 18 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.	D/Supt PSD/ACU & Vetting	By 30 April 2023	11/12/2022 This activity is already undertaken in the Constabulary.
Recommendation 25 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.	D/Supt PSD/ACU & Vetting	By 30 April 2023	11/12/2022 Constabulary PSD Investigators make case by case decisions and the lines of enquiry undertaken are identified as part of this process. However, to ensure best practice the contents of this report and recommendation will be circulated and discussed with the investigators as a part of ongoing CPD.
Recommendation 26 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.	D/Supt PSD/ACU & Vetting	By 30 April 2023	11/12/2022 This activity is already undertaken in the Constabulary. To ensure compliance a proportionate internal review will be conducted.

HMICFRS	Owner	Timescale	Progress
Recommendation 27 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.	NPCC	By 30 April 2023	11/12/2022 Once completed this can be progressed by the PSD.
Recommendation 28 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.	D/Supt PSD/ACU & Vetting	By 30 April 2023	11/12/2022 The Constabulary were not one of the forces chosen for inspection. Therefore, the Head of PSD will consider the best approach to this recommendation and its implementation. This recommendation will be included for scheduling in the PSD Improvement Plan.

HMICFRS	Owner	Timescale	Progress
Recommendation 40 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.	D/Supt PSD/ACU & Vetting	By 30 April 2023	11/12/2022 This activity is already undertaken in the Constabulary. To ensure compliance a proportionate internal review will be conducted. This recommendation will be included for scheduling in the PSD Improvement Plan.