

Gloucestershire Constabulary

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Mr Richard Bradley
Chief Executive
Office Police and Crime Commissioner –
Gloucestershire

Our Ref: JS-jms/Bradley HMICFRS Abuse of
Authority

Email: jon.stratford@gloucestershire.police.uk

Direct 01452 752331
Dial:

Date: 28 October 2019

Dear Richard

Re: Response to the national HMICFRS report

Fraud: Shining a light on betrayal: Abuse of Authority

Please find below our response to the above report, aimed at assisting you to meet the requirements of Section 55(1) of the Police Act 1996. The report has been compiled by HMICFRS as a sub-section of the PEEL inspection programme, which the force provided evidence to in October 2018, and to which we have previously commented.

Thank you for meeting with Louise Gill, our HMICFRS Liaison Officer to confirm your preferred approach to these reports. As agreed, we have extracted the recommendations from the report into table form to provide an overview of force activity in this area.

Due to the sensitive nature of some of the information, on this occasion we have provided you with two versions, a full update and a redacted public facing version.

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

Yours sincerely



Jon Stratford
Deputy Chief Constable

Att/.



Abuse of Authority for Sexual Gain

The report was formed from evidence gained during the PEEL inspections and extracted into a national report.

| Number | HMICFRS | Owner | Timescale | Progress/Date |
|--------|--|------------|-------------|---|
| 1 | <p>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.</p> | All Forces | Immediately | <p>Gloucestershire comply with the national guidance on vetting.</p> <p>At present the Constabulary does not have any employees who have never been through the vetting process.</p> <p>However, there are 104 individuals who currently (20/10/19) have a lapsed clearance.</p> <p>Substantial progress continues to be made in relation to lapsed clearances and this figure represents a reduction from 443 at the start of this financial year 2019/20.</p> <p>Each month around 40 clearances naturally lapse and in order to address this we issue vetting forms two months prior in order to try and avoid employees' vetting lapsing at all.</p> <p>As a result the number of lapsed clearances continues to significantly reduce and we are on course to have no lapsed employees by early</p> |

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| | | | | <p>2020 and certainly by July 2020 as the recommendation stipulates.</p> <p>An additional 130 people require an upgrade to their current clearance. The majority of this number is down to recently being informed that nationally, individuals who administer live data onto PNC must be cleared to a minimum of MV. This has resulted in a requirement to upgrade all staff within the control room. It is anticipated that this work too will be completed by July 2020.</p> <p>We have a 'designated post' system in place to ensure that personnel have been vetted to the required level for their role. Vetting representation on the workforce posting panels is being addressed to ensure that vetting are able to identify those moving roles and who may require a higher clearance.</p> |
| 2. | <p>Recommendation By April 2020, the NPCC lead for vetting and the College of Policing should devise a standardised list of information that should be shared between forces when someone transfers from one force to another. As a minimum, we would expect this to include information on performance, sickness, complaints, business interests, notifiable associations and any other corruption intelligence. All forces should then adopt this as soon as reasonably practicable.</p> | NPCC & CoP | April 2020 | Not a Force recommendation. We await the NPCC standardised list and will adopt this once received. |
| 3. | <p>Recommendation By September 2020, the NPCC lead for counter corruption and the Home Office should work together with software suppliers to provide a solution to enable all forces to implement proactive ICT monitoring.</p> | NPCC & HO | Sept 2020 | Not a Force recommendation. We have provided an update in Recommendation 4 as to the Force's current ICT monitoring situation. |

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| | By September 2020, the NPCC should also work with forces to establish a standardised approach to using the information that ICT monitoring software provides. | | | |
| 4. | <p>Recommendation By April 2020, all forces that haven't yet done so should:</p> <ul style="list-style-type: none"> • record corruption using the national corruption categories; • produce a comprehensive annual counter-corruption strategic threat assessment, in line with the authorised professional practice; and • establish regular links between their counter-corruption units and those agencies and organisations who support vulnerable people. <p>Where forces are yet to implement an effective ICT monitoring system that allows them to monitor desktop and handheld devices, they should do so as soon as reasonably practicable.</p> <p>By September 2020, all forces should have completed a review of their use of encrypted apps on police ICT systems to understand the risk they pose and to take any necessary steps to mitigate that risk.</p> | All Forces | April 2020 & Sept 2020 | <p>Reports of Police Corruption are recorded within our ACU according to the national corruption categories.</p> <p>All intelligence and cases are recorded and developed depending on the nature and facts of the information received. All reports are reviewed, recorded and assessed using THRIVE+ and Risk Appetite and Risk Attitude (RARA) models where appropriate.</p> <p>A Counter Corruption Strategic Threat Assessment is produced annually by the end of December each year. All strategic assessments for the region are then collated to produce a regional counter corruption strategic assessment which is sent to the NCA to inform the national assessment.</p> <p>The Anti-Corruption Unit (ACU) has provided Abuse of Authority for Sexual Purpose (AASP) presentations throughout the past year to all partner agencies who support vulnerable people. These include, Safeguarding Leads in Education (County wide), the Local Safeguarding Adults and Children's Boards (now executive), Gloucester Rape and Sexual Assault Centre (GRASAC), the Gloucestershire Domestic Abuse Support Service (GDASS), Gloucester Refuge, The Together Trust/Social Care, Victim support and housing.</p> |

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| | | | | <p>This has provided these organisations and volunteer sector staff with an understanding of AASP and on-going communication and referral of their concerns to the ACU.</p> <p>Training input was provided by ACU staff to the regional Independent Office for Police Conduct (IOPC) in Birmingham regarding AASP with key focus on highlighting subject matter and potential trigger signs of AASP.</p> <p>The next phase of ACU AASP presentations commence in November 2019 and are linked in with community partnerships and the PCC, focusing on the NHS and Public Health sectors.</p> <p>In addition, work has been undertaken with the Force Learning and Development department to deliver a bespoke training package and presentation to all new Police recruits and staff. These presentations highlight the function of the ACU, AASP and current corruption issues, as well as channels of communication for them with the ACU. Presentations have been delivered to Corporate induction days, as well as Supervisor courses which are run throughout the year.</p> <p>Monitoring of ICT/Encrypted apps: REDACTED</p> |
| 5. | <p>Recommendation By April 2020, all forces that haven't yet done so should make sure they have enough people with the right skills to look proactively for intelligence about those abusing their position for a sexual purpose, and</p> | All Forces | April 2020 | <p>The ACU is staffed by a mixture of officers and staff.</p> <p>One of the key focusses of the ACU has been to identify those officers who are using their position for sexual gain.</p> |

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| | <p>to successfully complete their investigations into those identified.</p> | | <p>The ACU is staffed experienced Detectives who are appointed by executive selection due to the sensitivity of the role. Recruitment into post involves consideration of skill profiles to ensure that the department has a balance of experience in relation to intelligence development and investigations, specifically from the Public Protection arena.</p> <p>The department capability is complimented by the use of research and analysis. This provides the department with the necessary assets to successfully investigate officers abusing their position for a sexual purpose and to do so proactively.</p> |
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