HMICFRS

His Majesty's Inspectorate of Constabulary
and Fire & Rescue Services

A report into the effectiveness of vetting and counter-corruption arrangements in West Mercia Police

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 forces manage vetting and counter-corruption.

Previously, we inspected these areas as part of our police effectiveness, efficiency and legitimacy (PEEL) programme. We set out our findings in the inspection report.

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

In September 2021, we inspected West Mercia Police to examine the effectiveness of the force’s vetting, IT monitoring and counter-corruption. We briefed senior personnel in the force 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 in 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?

The force has a vetting management IT system, but this system doesn't link to its human resources (HR) system. However, HR staff have access to the vetting management system via a portal. They can input workforce data directly, prompting the force vetting unit (FVU) to send vetting forms to the workforce when needed. The FVU and HR have a close working relationship and hold monthly meetings to make sure processes work efficiently.

The force shares its vetting management system with Warwickshire Police and the two forces have previously collaborated. This means the system also contains details of the Warwickshire workforce and contractors. This makes it more difficult to extract data, meaning the FVU is slightly less efficient. The force has plans to move to a single-force database.

The vetting data return and our dip-sampling showed that all members of the workforce and contractors held the correct level of vetting. When we assessed activities against the Authorised Professional Practice on vetting, we found the force was fully compliant. At the time of our inspection, the force had 12 cases requiring a health-check or renewal. The force was processing all of these before they were due.

We found that the force had identified designated posts that need enhanced management vetting. But we questioned the vetting levels of some roles, such as roads policing officers and dog handlers. It was unclear why the force deemed them designated posts. Over-grading the vetting requirement of posts puts an increased demand on FVU resources.

At the time of our inspection, there were 122 members of the workforce waiting for an upgrade to the enhanced management vetting. The FVU was working its way through this list as and when it had time.

The force vetting manager and supervisor scrutinise all vetting rejections to quality assure them. But we found no evidence of the force analysing potential disproportionality in vetting decisions. For example, it doesn’t analyse the proportion of rejections for applicants with a particular protected characteristic compared to the proportion of rejections for a control group without that protected characteristic. This means the force has no way of understanding the reasons for any disproportionality, so it isn’t taking any action to address it. As a result, we have identified this as an area for improvement.

Area for improvement

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?

The force can't monitor all its IT systems. Since our last inspection, it hasn't introduced an effective software monitoring system. This was an area we previously identified for improvement. The force told us it intends to submit a proposal for such a system in 2023.

We reviewed 60 items of potential corruption intelligence. We found the lack of comprehensive IT monitoring was detrimental to the effectiveness of the anti-corruption unit's work. For example, investigators can only carry out limited reactive auditing work on some force systems. That said, the force proactively analyses the available data to good effect, monitoring excessive mobile and internet usage.

The force has a lawful business monitoring policy that adequately enables reactive audit work.

The force recognises the risk associated with using encrypted apps on force devices, but it allows it because of the operational benefits they believe these apps bring. One example is an operational talkgroup for firearms incidents. We encourage the force to continually assess the risks the use of these apps pose.

In our 2016 report *PEEL: Police legitimacy – An inspection of West Mercia Police* we identified IT monitoring as an area for improvement, stating:

> "The force should ensure that it has the capability and capacity to monitor all its computer systems to identify risks to the force's integrity."

Similarly, in our 2018/19 report *PEEL Police effectiveness, efficiency and legitimacy report – An inspection of West Mercia Police* we identified an area for improvement, stating:

> "The force should ensure that its counter-corruption unit has enough capability and capacity to counter corruption effectively and proactively; and can fully monitor all of its computer systems, including mobile data, to proactively identify data breaches, protect the force's data and identify computer misuse."

Then in our 2019 PEEL spotlight report *Shining a light on betrayal: Abuse of position for a sexual purpose* we made a number of national recommendations, stating:

> "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."
>
> "By September 2020, the NPCC should also work with forces to establish a standardised approach to using the information that ICT monitoring software provides."
>
> "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."

At the time of our inspection, the force didn't have an IT monitoring system, but it had plans in place to introduce one in early 2022. As a result, we have identified this as a continued area for improvement.

Area for improvement

The force should implement its plans and make full use of the IT monitoring software when it is introduced.

4. How well does the force tackle potential corruption?

The force has a counter-corruption strategic threat assessment (STA), which is fit for purpose. The document contains relevant data to support the force's findings. The force uses the MoRiLE scoring process to help it prioritise threats. Although there is no bespoke control strategy underpinning the STA, the counter-corruption unit (CCU) uses a structured tasking process to effectively monitor progress on key areas of threat.

Of the 60 items of corruption intelligence we reviewed, the force correctly categorised most of them in line with the national Authorised Professional Practice on counter-corruption (intelligence) categories.

The CCU has sufficient resources to meet current demand. The force will need to review this once it has introduced IT monitoring systems as workload is likely to increase.

The CCU has developed presentations to raise awareness amongst its officers and staff about abuse of position for a sexual purpose (AoPSP). This includes reporting processes should they have concerns. But this initiative stagnated during the pandemic. We found the force needed to improve its communication and messaging internally to make sure everyone, especially supervisors, is aware of the warning signs to look for.

The force recognises it hasn't yet developed effective working relationships with external organisations that support vulnerable people. During our review of corruption intelligence files, we found no AoPSP cases that had been referred by these external organisations.

The force needs to improve the way it collects intelligence after reports of sexual misconduct. We found that the force fails to carry out all relevant inquiries to establish if reported behaviour presents further risk to the public. For example, we identified a case in which an officer was under investigation for several off-duty allegations of rape. But the force had missed some opportunities to scrutinise his behaviour with vulnerable females he had met during his duties. We find this surprising.

In our 2019 PEEL spotlight report *Shining a light on betrayal: Abuse of position for a sexual purpose* we made national recommendations stating:

> "By April 2020, all forces that haven't yet done so should […]:
>
> - establish regular links between their counter-corruption units and those agencies and organisations who support vulnerable people."
>
> "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 to successfully complete their investigations into those identified."

Despite these previous findings, the force hasn't made good enough progress to improve its links between the CCU and organisations that support vulnerable people. Similarly, it hasn't made good enough progress to make sure it has enough officers and staff with the right skills to look proactively for intelligence relating to AoPSP. Accordingly, we have identified these as continued areas for improvement.

Areas for improvement

- The force should improve its links between the counter-corruption unit and organisations that support vulnerable people, to raise awareness of abuse of position for a sexual purpose.
- The force should make sure it has enough people with the right skills to look proactively for intelligence on abuse of position for a sexual purpose.

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