

Committee(s): Professional Standards and Integrity Committee	Date(s): 29 th November 2019
Subject: Force response to HMICFRS report: PEEL spotlight report, Shining a light on betrayal (Abuse of position for sexual purpose)	Public
Report of: Commissioner of Police	For Information
Report author: Head of Strategic Development, City of London Police	

Summary

This is a national report that focuses on one aspect of the PEEL Legitimacy criteria, abuse of position for sexual purposes. Published on 27th September 2019, it looks at the progress forces have made tackling this issue following previous reports on the subject dating back to 2015.

This paper finds that from a prevention perspective, forces have good ethical cultures, with leaders setting high standards. Conversely, HMICFRS are concerned at the numbers of people working in forces that do not appear to have been appropriately vetted. HMICFRS also feel that the threat is not properly understood by forces, with many recording corruption intelligence incorrectly. This is linked to forces' inability to monitor their staffs' use of ICT systems.

The capacity and capability of forces' counter corruption units (CCU) also remains an issue for many forces. HMICFRS assess that of the 43 forces, 32 do not have sufficient staffing levels. Benchmarking shows that in forces will fewer than 2000 officers and staff, CCUs had between 5 and 8 staff.

The report makes the following recommendations:

R1 – All forces that are not yet doing so should immediately comply with all elements of the national guidance on vetting. (The Force complies with this and is therefore GREEN in this area).

R2 and R3 – (for the NPCC Lead)

R4 – By April 2020 all forces that have not yet done so should:

- Record corruption using national categories
- Produce a comprehensive annual counter corruption strategic threat assessment

- Establish regular links between their CCUs and those agencies that work with and support vulnerable people.

R5 – By April 2020 all forces that not 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.

Recommendations 4 and 5 effectively duplicate the areas for further improvement (AFIs) that were given to the Force as part of the last legitimacy inspection and which were reported to your last Committee.

Recommendation

Members are asked to note the report.

Main Report

Background

1. On the 27th September 2019, Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS) published a national PEEL 'spotlight' report titled "Shining a light on betrayal" focussing on abuse of position for sexual purposes. Specifically, it assesses progress forces have made in tackling the issue since its previous 2 reports, published in 2015 and 2017.
2. Your Committee requested details of the Force's response to those findings be submitted to its next meeting. This paper presents those details and provides Members with assurance that the City of London Police is addressing the issues raised by HMICFRS. Specifically, the report provides details of action taken to address the formal areas for further improvement (AFIs) and additional comments made by HMICFRS.

Current Position

3. HMICFRS note encouraging progress made and an improved understanding of the problem across the whole of the policing and cite examples of forces being proactive and creative in looking for signs of corruption. This has included good engagement with external agencies who receive feedback from those they support about the behaviour of officers and staff.
4. However, they also found that in many forces progress has been much slower, with inadequate investment in the necessary resources to be proactive in looking for corruption.

Prevention

5. Overall, HMICFRS note forces have good ethical cultures. They are now generally good at creating an ethical environment where the abuse of position for a sexual purpose is recognised as police corruption and totally unacceptable. They go on to

say that leaders set and reinforce clear standards and create an organisational culture that encourages ethical and lawful behaviour. This includes challenging inappropriate behaviour, openly discussing dilemmas, learning from mistakes and encouraging continual improvement. Adopting this approach helps safeguard the public, reduces the risk of the workforce behaving unacceptably and helps promote public trust and confidence.

6. However, they note a concern that many people are working in policing across the country that have not been appropriately vetted. This finding led directly to their first recommendation (see paragraph 12 below). City of London Police is already compliant in this area and therefore this is assessed as GREEN.

Understanding the threat

7. HMICFRS found too many forces are recording corruption intelligence incorrectly. Not doing so means many forces do not have a complete picture of the extent of the threat they face.

Uncovering corruption

8. Another area of concern noted by HMICFRS is the number of forces who are currently unable to monitor how their staff use information and communication technologies (ICT). This was a finding in the Force Legitimacy report, and is therefore being addressed through the procurement of new software that ensures the Force can meet this expectation.
9. Whilst some forces are good at working with external agencies to identify the warning signs of inappropriate behaviour, others are not doing enough to develop effective links with these agencies. This is an area the Force has made considerable progress in (as reported to your last Committee meeting), especially those organisations that deal with vulnerable people.

Taking action

10. Many forces still don't have enough capacity in their counter-corruption units. HMICFRS assess that of the 43 forces, 32 do not have sufficient staffing levels. Benchmarking shows that in forces with fewer than 2000 officers and staff, CCUs had between 5 and 8 staff. Forces need enough dedicated resources to proactively look for warning signs and develop intelligence. Many forces still don't have enough capacity in their CCUs. Those who uncover the most cases are generally those who proactively look for this type of corruption and aren't necessarily the forces with the greatest problems. Members will be aware that this has been an issue for City of London Police for some time, and efforts are ongoing to recruit to 2 vacant positions which were approved as part of the uplift for 67 additional officers. When up to strength, and with the software referred to in paragraph 8, the Force will be in a stronger position with regard to proactively targeting corruption.
11. HMICFRS notes the importance of victims feeling supported throughout any investigation, including abuse of position for a sexual purpose. This is something that the City of London Police would always strive to do.

HMICFRS Recommendations

12. The report makes 5 recommendations:

R1 – All forces that are not yet doing so should immediately comply with all elements of the national guidance on vetting. As previously noted, the Force complies with this and is therefore GREEN in this area.

R2 and R3 are specifically for the National Police Chief Council Lead to deliver

R4 – By April 2020 all forces that have not yet done so should:

- Record corruption using national categories
- Produce a comprehensive annual counter corruption strategic threat assessment
- Establish regular links between their CCUs and those agencies that work with and support vulnerable people.

R5 – By April 2020 all forces that not 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.

13. Recommendations 4 and 5 effectively duplicate the areas for further improvement (AFIs) that were given to the City of London Police as part of the last legitimacy inspection and which were reported to your last Committee. They are also included in the Integrity Development Plan submitted to your Committee for information.

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