

Committee(s): Professional Standards and Integrity Committee	Dated: 4 June 2024
Police Authority Board	5 June 2024
Subject: Angiolini Inquiry- Part 1- CoLP Update	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	CoLP impact the following Corp Plan outcomes: Vibrant Thriving Destination- (Community Safety/ CT) Dynamic Economic Growth- (National Lead Force)
Does this proposal require extra revenue and/or capital spending?	N/A
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of: Commissioner of Police Pol 69-24	For Information
Report author: D/Supt Carly Humphreys, Professional Standards, P&T	

Summary

On the 22nd November 2021, following the sentencing of Wayne Couzens the then Home Secretary addressed Couzens' crimes and announced that she was launching an independent inquiry. The Angiolini Inquiry was commissioned as an independent, non-statutory inquiry. The Terms of Reference outlined the Inquiry's investigative scope, which sought to establish a comprehensive account of the career and overall conduct of the killer of Sarah Everard, to identify any missed opportunities, and to make recommendations based on the findings.

On the 29th February 2024 Part One of The Angiolini inquiry was published¹, this addressed how Sarah's killer was able to serve as a police officer for so long and seek to establish a definitive account of his conduct. The inquiry noted 16 recommendations, this report provides an initial response from the City of London Police to those recommendations, including the national position from the National Police Chiefs' Council and the Government.

Part Two of the Inquiry will consider wider issues in policing in respect of policing and the protection of women. The Terms of Reference for this part of the inquiry have been agreed, however the publications for this and Part Three are unknown at this time. Following the sentencing of former police officer David Carrick in February 2023, Part Three of the Inquiry was established to examine Carrick's career and conduct.

¹ [The Angiolini Inquiry – Part 1 Report \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

A review of these recommendations provides reassurance that the majority of those which are force-specific, are already either being delivered on or there is work underway to achieve the recommendation. Indeed, many of the recommendations relating to Vetting are welcomed as they support our own commitment in further professionalising the investigative approach within vetting and shared high standards in information exchange between forces and other agencies. We remain keen to understand a fuller position from the national recommendations and how we will need to support that at a force-level. In particular, the impact this will have on resourcing and finance to achieve what is agreed by national stakeholders.

Recommendation

It is recommended that Members note the report.

Main Report

I. Content and Findings (summary)

This report provides an overview on all of the 16 recommendations received from 'The Angiolini Inquiry Part One'. Please note that the recommendations are listed in a summary format for brevity but are outlined in full in [Annex A – The Angiolini Inquiry Part One, Recommendations in full](#).

A summary of the current position for the City of London Police, specifically regarding work already being delivered across each recommendation and where further work is required is outlined in this report.

Whilst it is accepted that the policing and public benefit of these recommendations must take precedence, some recommendations will present a resourcing and financial impact on the organisation, the ability to overcome these challenges is shared across forces and will be clearer as the national position develops. A number of recommendations, require joint work across the Home Office, Ministry of Justice, College of Policing and National Police Chiefs' Council, before they can be locally implemented.

II. National Position

The National Police Chiefs' Council have implemented governance arrangements to oversee policing's response to the 16 recommendations received from The Angiolini Inquiry, Part One. Monthly meetings will be held with national Chief Officer leads for thematic areas including: Violence Against Women and Girls, Equality, Diversity and Inclusion, Professional Standards & Ethics, Race Action Plan, Vetting, Chief Scientific Advisor for Policing, Culture and Communications.

This will be supported by a cross-sector group which brings together the NPCC, College of Policing (CoP) and Home Office to discuss as a whole the progress made against each recommendation.

We expect to receive updates from these groups in due course regarding the work being done against each recommendation, focusing in particular on the potential or existing barriers or challenges to delivery and providing direction to forces on how these can be addressed.

In March 2024, the Government accepted the recommendations made which place a requirement on the Home Office to work with the NPCC, CoP and other partners to understand the link between indecent exposure and an escalation in behaviour to ensure that the right measures are in place to catch more criminals earlier. The requirements of these national agencies are outlined alongside the force specific recommendations below.

III. City of London Police Progress on Recommendations

Recommendation 1: Approach to investigating indecent exposure

This recommendation requires all forces to ensure they have a specialist policy in place for investigating all sexual offences, including 'non-contact' offences, such as indecent exposure.

The City of London Police has this in place through oversight of all sexual offences being investigated within the Public Protection Unit (PPU), including 'non-contact' offences. This policy extends to ensuring the case is managed at the most specialist level with an officer trained in specialist sexual offences who also holds Professionalising Investigation Programme (PIP) level 2 accreditation.

Linked to operation Soteria, the transformation programme for Rape And Serious Sexual Offending (RASSO) within our CoLP Sexual Offences policy is subject of a review. This will align and support our work to implement the RASSO national operating model. Governance and delivery of this work is delivered by a cross-department project team led by the Specialist Operations Chief Superintendent with support from the CoLP Corporate Programme Office; recognising the need for a whole system approach to successful service delivery.

Recommendation 2: Guidance and training on indecent exposure

This is a recommendation for the College of Policing (CoP), in collaboration with the National Police Chief's Council (NPCC) to improve guidance and training on indecent exposure, in order to improve the quality of investigations and management of cases.

Although we await guidance from the CoP and NPCC on this matter. We have already assessed what training we currently provide and identified gaps in provision. Additionally, we are connected to regional and national groups linked to operational (Pursue, Prevent, Protect and Prepare) activity for sexual offending.

All student officers receive specific training on responding to sexual offences, including indecent exposure, this is part of First Responders Rape and Serious Sexual Offences Investigative Skills Development Programme (RISDP). The training programme is part of the CoP syllabus and also includes victim care. This course is currently being delivered across all operational areas of Specialist Operations, beginning with Public Protection, CID and Major Crime.

Recommendation 3: Treatment of masturbatory indecent exposure within the criminal justice system

The Home Office, Ministry of Justice, CoP and NPCC have been asked to conduct a fundamental review.

We await the results of this review and any resulting guidance.

Recommendation 4: Research into masturbatory indecent exposure

The Home Office in collaboration with CoP have been asked to commission research to establish if there is an evidence-based link between active masturbatory indecent exposure and subsequent contact offending.

We await the result of this and anticipate that any relevant findings will be used to shape national policy, training and guidance.

Recommendation 5: Public Information campaign on indecent exposure

By March 2025, the Home Office and NPCC should launch a public campaign to raise awareness and publicity surrounding the illegality, consequence of indecent exposure and to encourage reporting of unsolicited photographs sent of genitals with the intention to cause harm, distress or humiliation.

The CoLP Corporate Communications team are sighted on these recommendations and will support this public campaign through amplifying these messages across our organisation and communities.

Recommendation 6: Review of indecent exposure allegations and other sexual offences recorded against serving police officers.

By September 2024, the NPCC in collaboration with all force vetting units should review all allegations of indecent exposure and other sexual offences recorded on PND and PNC against serving officers.

A review has been completed and has concluded that there have been no allegations of indecent exposure linked to any CoLP officers, staff or volunteers following the Historical Data Wash results. We will be keen to work with the NPCC and other forces to establish an ongoing process to monitor PNC and PND submissions in real-time.

Recommendation 7: In person interviews and home visits

The CoP in collaboration with force recruitment should ensure that every new candidate applying to become an officer undergoes an in-person interview and home visit. This should be designed to provide a holistic picture of the candidate and a better understanding of the candidate's motivations for joining the police and their dedication to serving the public.

In person interviews have been in place for student officers since April 2023. These interviews are led by an officer of Sergeant or Inspector rank posted within Learning and Development, supported either by a member of the HR Team or another member of police staff within Learning and Development.

To perform home visits as one of the initial stages of the recruitment process, would prove a significant resourcing and potential budgetary challenge especially given the high attrition of student officers during the recruitment stage. Conversion is on a ratio of 1:10, so for every 10 applicants, only one will be successful. In CoLP, two student officer cohorts of 14 officers are run per financial year, necessitating 280 applicants to meet our student officer recruitment targets. Approximately 60% of this number do not pass the National Sift, Online Assessment Centre or interview stage, leaving 112 applicants for whom home visits would need to be carried out. The home visits would require dedicated resourcing, at this time it is unknown what the precise resource requirement would be. Due the demographic of our candidates and our location within the City, most of our candidates live outside of London meaning the time to travel to visit them would be greater than for other forces who recruit from closer residential areas.

Although we await national guidance on this process, to reduce some demand and financial pressure, one option would be to delay the home visit until further along in the vetting and onboarding process.

It is important conscious of the impact home visits may have on applicants from certain communities and groups which may deter them from applying, especially those from under-represented groups within which the force has struggled to recruit from previously. It will be important that this is managed and monitored carefully to minimise the impact on CoLP's ability to grow a diverse and inclusive workforce. It is also anticipated that some of these challenges will be discussed through the NPCC thematic areas of EDI, Police Race Action Plan, Culture and PSD during their oversight meetings.

National Guidance around the Integrity questionnaire and training for officers conducting the home visits would be essential to ensure this is standardised across all forces and what exactly the visits are designed to assess and against which framework.

Recommendation 8: Recruitment and vetting policy, processes and practices

By June 2024, the CoP in collaboration with force vetting units should take further steps to prevent those unsuitable for policing from joining the profession.

This recommendation particularly focuses on recruitment and vetting policy, processes and practice. Included in this recommendation is also a requirement for applicants to undergo an assessment of their psychological suitability of the role, including existing firearms officers. Our Occupational Health team is linked in with national leads and the CoP to ensure that any revisions to the medical recruitment guidance are evidence led. We also welcome further national guidance on the link between debt, mental health, vulnerability to corruption and suitability to be a police officer; to inform how we apply this within the new Vetting APP (Authorised Professional Practice).

We also welcome the updates to the new Vetting APP which supports our local decisions, already in place, to reject vetting applications of any individual with a conviction or caution for a sexual offence and to provide an information sharing agreement for vetting checks across armed forces.

Some aspects of this recommendation are already being delivered through existing HMICFRS recommendations, including the routine use of PND and PNC in all vetting applications. We also acknowledge the recommendation that no officer should be onboarded, even for initial training until all vetting has been completed.

Recommendation 9: Professional rigour in decision-making

By March 2025, the CoP in collaboration with force vetting units should take steps to improve the quality and consistency of police vetting decision-making.

We welcome this recommendation to enhance our own professional consistency but also to ensure that this standardised approach will ensure that there is an audit trail of effective decisions should an officer transfer forces.

Already, we have developed our vetting decision-making processes to ensure that they are structured and scrutinised. Our vetting officers will shortly receive bespoke interview training and be mentored by an experienced Counter Corruption Unit (CCU) officer to ensure that an investigative mindset is applied at all opportunities within the vetting process.

Recommendation 10: Vetting Code of Practice and transfers

With immediate effect, all recruiting forces should have regard to the new Vetting Code of Practice, which requires the parent force to provide all relevant information requested about the transferee to enable an effective assessment of risk by the force conducting a full re-vet of the transferee.

We are compliant with this recommendation and ensure that the new Vetting Code of Practice is followed to provide all relevant information requested about a transferee by the force conducting the vetting.

Recommendation 11: Information-sharing

By December 2024, the College of Policing in collaboration with force vetting and recruitment units, should ensure that information-sharing practices, including data retention policies, are strengthened in order to prevent those who commit sexually motivated crimes against women and those otherwise unsuitable for policing from remaining in, or moving across, the policing profession.

This requires a number of actions to be completed by CoP and force vetting units by December 2024, many of which we already adhere to as good practice. One area being that we notify the relevant home force of any vetting issues found within a transferee's application.

We welcome the proposed national 'shared referencing protocol' between uniformed services such as the Ministry of Defence, HM Prison service etc, to provide information regarding any past disciplinary or honesty/integrity issues.

Recommendation 12: Right to Privacy

With immediate effect, police forces should convey to all existing and prospective employees that they must be held to a higher standard of behaviour and accountability than members of the public.

L&D and PSD does convey to all existing and prospective employees that they will be held to a higher standard of behaviour and accountability than members of the public, and that therefore their right to privacy can be fettered in certain circumstances.

We do routinely ensure that these messages are disseminated through existing routes such as student officer and leadership days, professionalism newsletters, PSD working groups and ethical dilemma exercises, however we are working with our engagement officer to implement a more impactful communications strategy specifically to this recommendation.

Recommendation 13: Aftercare

By December 2024, the CoP in collaboration with force vetting units should develop a stronger approach to force vetting aftercare in order to monitor an individual effectively throughout their career.

Presently, the re-vet process is part of 'business as usual' within the unit and is largely reactive to a vetting renewal being identified. Where a concern has been raised regarding an individual's vetting, this would immediately be progressed through our vetting unit and, if required, our CCU. The vetting unit would require an additional resource to embed a dedicated 'aftercare prevent' team. This is a timely recommendation as the current vetting establishment is being reviewed to ensure that resourcing and capability can service all necessary demand.

Recommendation 14: Positive culture and elimination of misconduct or criminality often excused as 'banter'

With immediate effect, every police force should commit publicly to being an anti-sexist, anti-racist, anti-misogynistic organisation.

PSD take responsibility to communicate setting the standards and also our responsibility to intervene and take action when the standards are not met. The outcomes are disseminated out across the organisation through organisational learning and also misconduct publications.

The force's refreshed EDI Strategy is soon to be published and will clearly set out the force's position on building a truly inclusive and positive culture with zero-tolerance towards any forms of discrimination.

The Professionalism and Trust team have created a programme of 'Active Bystander' training which is being rolled out across the force to help give people the knowledge and confidence to call out behaviour which falls below our standards, including 'banter' specifically. We pride ourselves on being one of the first forces to deliver this training. Alongside, we also deliver modules for our 'Inclusivity Programme' where we invite key speakers to address issues including misogyny, racism and unconscious bias.

Again, this forms part of our Inclusivity Programme where attendance is being monitored and we have plans to ensure compliance.

Recommendation 15: Reporting by police officers and staff of harassment, sexual offences and inappropriate behaviour committed by fellow officers

With immediate effect, all police forces should take action to understand and confront the barriers that police officers and staff face when reporting sexual offences committed by a person they work with or in the workplace.

New processes within PSD ensure that any complaints of this nature are dealt with the highest standards. These are managed through the DCI who holds strategy meetings for all conduct matters relating to officer behaviours. These include ensuring that the investigation is appropriately resourced, operates in line with investigative policy, the victim is well supported and that any risk is appropriately and expeditiously managed.

The recommendation requires a dedicated reporting process for women in policing who experience inappropriate behaviour related to their gender. Although there are specific supported routes into PSD, the establishment a dedicated process is currently being reviewed and will require some engagement from our Network of Women Association and other groups to confirm the best approach.

Our Cultural Audit pilots have started this month to coincide with the publication of the staff survey results. The Cultural Audit will have two parts, the first will aim to identify elements of hidden culture, including low-level behaviour types which do not reach the misconduct threshold. The second will be a risk profiling exercise, to understand the scale and reach of the issues identified. Through understanding the culture, interventions can be put in place which help to create an inclusive and psychologically safe environment, where 'calling out' and reporting concerns is supported and encouraged.

Recommendation 16: Recruitment and retention of women in police forces:

By September 2024, the CoP and NPCC should review and examine the conditions of female officers and staff in order to encourage more women to join the police.

Although this is a national recommendation, this is a priority for CoLP within our People Strategy and our EDI Strategy. Our recruitment campaigns utilise specific webinars and 'buddy systems' for female candidates. Within the organisation, we have developed campaigns to advertise roles for part-time and flexible working, and also bespoke training and development for women seeking promotion and lateral development.

A Retention and Exiting Board looks to implement retention recommendations such as the National Leavers Framework and as part of this leavers data by demographic is examined to look for trends, opportunities to retain officers and staff and gain a much greater understanding of why people leave the organisation.

IV. Conclusion

The City of London Police has accepted the recommendations made to all forces. We also welcome the national improvements to be made through Vetting APP to enable us to be more robust across our police vetting processes.

We will continue work with our national partners and local departments to improve how we not only respond to masturbatory indecent exposure as a precursor to further sexual conduct, but also how we will continue to make strides to root out officers unsuitable for policing and to prevent the wrong people joining our force. We will also continue in the advances we have made to improve our culture through our inclusivity programme and the upcoming launch of our new EDI Strategy which will hold us to account for improving the experiences of women in policing and across our communities.

Progress against these recommendations will be led by Professionalism & Trust with monthly governance and oversight at CoLP's HMICFRS Operational Improvement Board, chaired by the Assistant Commissioner.

Background Papers:

[The Angiolini Inquiry – Part 1 Report \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

Appendices

Appendix 1- The Angiolini Inquiry Part One, Recommendations in full

Author:

Carly Humphreys

Detective Supt PSD

Professionalism & Trust

City of London Police

Carly.humphreys@cityoflondon.police.uk

Appendix A – The Angiolini Inquiry Part One, Recommendations in full:

Recommendation 1: Approach to investigating indecent exposure

At the earliest opportunity, and by September 2024 at the latest, police forces should ensure that they have a specialist policy on investigating all sexual offences, including so-called ‘non-contact’ offences, such as indecent exposure.

Recommendation 2: Guidance and training on indecent exposure

By December 2024, the College of Policing, in collaboration with the National Police Chiefs’ Council, should improve guidance and training on indecent exposure, in order to improve the quality of investigations and management of indecent exposure cases. In particular, the College of Policing should:

- a. review and update training, informed by crime statistics and research into the nature of indecent exposure and its impact on victims;
- b. review and update the guidance for police officers to improve the handling of indecent exposure cases;
- c. include guidance on appropriate resourcing for investigations; and
- d. ensure that guidance and training reflect the Sentencing Council guidelines, which recognise factors indicating increased harm and culpability.

This activity should be informed by the results of Recommendation 4 below.

Recommendation 3: Treatment of masturbatory indecent exposure within the criminal justice system

With immediate effect, the Home Office, Ministry of Justice, College of Policing and National Police Chiefs’ Council should work together to conduct a fundamental review of the way masturbatory indecent exposure is treated within the criminal justice system. The review should focus on: recognising the seriousness of the offence; identifying it as an indicator of disinhibition by perpetrators; and understanding and addressing the wider issue of sexual precursor conduct so as to prevent victimisation, improve the response to victims when it occurs and bring more offenders to justice.

Recommendation 4: Research into masturbatory indecent exposure

With immediate effect, the Home Office, in collaboration with the College of Policing, should commission research to establish if there is an evidence-based link between active masturbatory indecent exposure and subsequent contact offending. Where relevant, findings should then be used to shape policy, training and guidance for police officers investigating indecent exposure cases (as per Recommendation 2).

Recommendation 5: Public information campaign on indecent exposure

By March 2025, the Home Office, together with the National Police Chiefs' Council, should launch a public campaign to:

- a. raise awareness about the illegality/criminality and legal consequences of any type of indecent exposure and boost the confidence of victims to report cases of indecent exposure to ensure that more offenders are brought to justice; and
- b. increase publicity around the relevant legislation in order to encourage reporting of unsolicited photographs sent of genitals with the intention to cause harm, distress or humiliation and to discourage perpetrators from doing so.

Recommendation 6: Review of indecent exposure allegations and other sexual offences recorded against serving police officers

By September 2024, the National Police Chiefs' Council, in collaboration with all force vetting units, and building on the results of the recent data-washing exercise, should conduct a review of the circumstances of all allegations of indecent exposure and other sexual offences recorded on the Police National Database and the Police National Computer against serving officers. This is to identify, investigate and ultimately remove those officers found to have committed sexual offences from all police forces.

Recommendation 7: In-person interviews and home visits

With immediate effect, the College of Policing, in collaboration with force recruitment, should ensure that every new candidate applying to become a police officer in any police force undergoes an in-person interview and home visit. This should be designed to provide a holistic picture of the candidate and a better understanding of the candidate's motivations for joining the police and their dedication to serving the public. In particular, this should include the following:

- a. An in-person interview with the candidate to ensure that face-to-face contact is made with the recruiting force before the vetting or onboarding of the candidate is progressed.
- b. A visit to the residence of all new candidates. This should be used as another opportunity, in advance of vetting enquiries, to engage with the candidate, relevant family members or other occupants of the residence, wherever possible.
- c. An integrity questionnaire, used as part of the in-person home visit, to explore fully the candidate's personal attitudes and values, including increased scrutiny of the candidate's motivations and suitability for joining the police.
- d. Corresponding guidance and training for home visits must be developed to ensure that the visits will enable a better sense of the candidate's character, rather than judge living arrangements or socio-economic status.

Recommendation 8: Recruitment and vetting policy, processes and practices

By June 2024, the College of Policing, in collaboration with force vetting units, should take further steps to prevent those unsuitable for policing from joining the policing profession. This should include further developing the Vetting Code of Practice, Authorised Professional Practice on Vetting, and other guidance on recruitment and vetting practices in order to prevent those who commit sexually motivated crimes against women and those otherwise unsuitable for policing from holding the office of constable. In particular, recruitment and vetting policy, processes and practices must be developed in the following areas:

- a. Applicants should be required to undergo an assessment of their psychological suitability for the role (which is not just a questionnaire).
- b. There should be more robust use of the Police National Database during vetting, including as a tool to reveal unreported adverse information about applicants to ensure that potential risks are not missed. In particular, the Database should be used when individuals attempt to move between forces.
- c. Any individual identified as having a conviction or caution for a sexual offence should be rejected during police vetting. This should be clearly outlined in the Vetting Code of Practice and reflected in the Authorised Professional Practice on Vetting, which should consider all contact and non-contact sexual offences.
- d. The Authorised Professional Practice on Vetting should be amended to make it clear that military and/or Ministry of Defence checks should be carried out on all applicants who have served as military reservists.

- e. There should be a fundamental review of the link between debt, mental health, vulnerability to corruption and suitability to be a police officer, to inform vetting decisions. Detailed consideration should be given to the amount of unsecured personal debt held by officers, and rules should be amended to mandate officers to report any significant changes in debt to vetting teams. In addition, the rules should require applicants and officers to provide further insight into their finances, including any payday loans, when requested during the vetting process.
- f. There should be increased rigour in relation to checks for authorised firearms officers, to ensure that vetting standards are met, as well as the introduction of a psychological assessment and an appropriate process for seeking feedback from supervisors or line managers to determine suitability for the role.
- g. No police officer should be onboarded, even if only for initial training, before all vetting is complete. In addition, each officer's force vetting should be completed before their National Security Vetting is initiated. All force vetting information should be passed to National Security Vetting officers for consideration.

Recommendation 9: Professional rigour in decision-making

By March 2025, the College of Policing, in collaboration with force vetting units, should take steps to improve the quality and consistency of police vetting decision-making. This should include encouraging the use of greater professional rigour and curiosity when investigating lines of enquiry, in order to prevent those who commit sexually motivated crimes against women and those otherwise unsuitable for policing from joining the policing profession. These steps should include the following:

- a. Recruiting forces should be able to request that unresolved allegations discovered during vetting processes be reinvestigated.
- b. In collaboration with the National Police Chiefs' Council, a national vetting capability should be created, as an advisory function, to provide another layer of confidence in instances where complex vetting investigations and decisions are required. In such cases, forces should approach the national vetting function to seek proposed lines of enquiry and ensure that they are following an agreed, standardised approach when considering complex cases.
- c. Consideration should be given during vetting to any information or intelligence about police officers being reported missing, regardless of how quickly such reports were closed.

- d. Forces must ensure that force vetting units are complying with and practising Section 6.2 of the College of Policing Authorised Professional Practice on Vetting (2021), which states that force vetting units “must record the results of vetting enquiries; the rationale for refusing, suspending, withdrawing or granting clearance, including with restrictions; and where adverse information has been revealed and considered”. This is to ensure that an audit trail is recorded to give the force confidence in decisions made at the time and to allow future vetting officers to constructively scrutinise vetting enquiries and outcomes.

Recommendation 10: Vetting Code of Practice and transfers

With immediate effect, all recruiting forces should have regard to the new Vetting Code of Practice, which requires the parent force to provide all relevant information requested about the transferee to enable an effective assessment of risk by the force conducting a full re-vet of the transferee.

Recommendation 11: Information-sharing

By December 2024, the College of Policing, in collaboration with force vetting and recruitment units, should ensure that information-sharing practices, including data retention policies, are strengthened in order to prevent those who commit sexually motivated crimes against women and those otherwise unsuitable for policing from remaining in, or moving across, the policing profession. In particular, there should be a focus on the following information:

- a. Previous failures to achieve vetting should be recorded by all forces and flagged to recruiting forces. This should also trigger a re-vet with the current or recruiting force.
- b. A shared agreement should be made about the quality, relevant and necessary content, and sources of information that will be provided in a reference for a future force, also known as a ‘shared referencing protocol’, with directed questions that must be answered (for example, regarding any past disciplinary or honesty/integrity issues). Information to be shared as part of the protocol should be covered within the relevant forces’ fair processing notices. The protocol should apply to all transfers and applications to police forces from individuals in the uniformed services, including:
 - the Ministry of Defence (including the Army, the Royal Air Force and the Royal Navy, as well as their respective reserve forces);
 - fire and rescue services;
 - HM Prison and Probation Service;
 - other police forces; and

- relevant government agencies, such as Border Force or Immigration Enforcement.

This is to improve forces' access to – and ability to use – the totality of information they hold about officers in order to prevent, detect and deal with those likely to commit offences.

- c. As per Recommendation 8(b), there should be expanded access to and use of the Police National Database, including as a tool for revealing relevant uninvestigated adverse information about officers.
- d. Any adverse information or intelligence (developed or otherwise) should be passed by the current Professional Standards Directorate to the receiving Professional Standards Directorate for any officers transferring. No decisions on their appointment should be made until that intelligence has been reviewed, recorded and closed and the vetting units have had time to consider it. If the recruiting force identifies adverse information as a result of the vetting process, this should be shared with the current force for consideration and potential action.

Recommendation 12: Right to privacy

With immediate effect, police forces should convey to all existing and prospective officers and staff that they must be held to a higher standard of behaviour and accountability than members of the public, and that therefore their right to privacy can be fettered in certain circumstances. These circumstances include, but are not limited to: recruitment, vetting, aftercare, transfer, promotion, role change, returning to policing and maintaining standards. This is to ensure that members of the police are fully aware and accountable for the unique powers entrusted to them and the standards of professional behaviour they swear to uphold. Updated fair processing notices concerning changes to processing of personal data should be provided prior to any new processing taking place, including data-sharing.

Recommendation 13: Aftercare

By December 2024, the College of Policing, in collaboration with all force vetting units, should develop a stronger approach to force vetting aftercare in order to monitor an individual effectively throughout their career with the police and be aware of any change in circumstances as soon as possible to ensure that potential risks/red flags are identified and assessed. In particular, that approach should include the following:

- a. Mandatory, randomised re-vetting should be introduced, as an additional layer to standardised vetting periods, for police officers and staff, akin to randomised drug-testing.

- b. In addition to police officers and staff being required to declare any material changes in their circumstances within a managed system, such as a human resources system, supervisors, or anyone with concerns relating to behaviour, welfare or performance, should report them to Professional Standards Departments at any point.
- c. Professional Standards Departments should systematically exchange relevant and necessary information with vetting and counter-corruption units to consider information disclosed by any individual, and any action necessary.

Recommendation 14: Positive culture and elimination of misconduct or criminality often excused as 'banter'

With immediate effect, every police force should commit publicly to being an anti-sexist, anti-misogynistic, anti-racist organisation in order to address, understand and eradicate sexism, racism and misogyny, contributing to a wider positive culture to remove all forms of discrimination from the profession. This includes properly addressing – and taking steps to root out – so-called 'banter' that often veils or excuses malign or toxic behaviour in police ranks.

Recommendation 15: Reporting by police officers and staff of harassment, sexual offences and inappropriate behaviour committed by fellow officers

With immediate effect, all police forces should take action to understand and confront the barriers that police officers and staff face when reporting sexual offences committed by a person that they work with or in the workplace. This is in order to encourage victims, who are also police officers or police staff, to come forward and submit complaints, as well as to identify and remove those who are not fit for service. To do this, forces should:

- a. ensure, when a complaint is made, that sufficient and appropriate resources are dedicated to supporting the complainant, including maintaining anonymity where needed or requested, and ensuring an investigation is carried out as appropriate;
- b. address cultural barriers to reporting, such as re-victimising complainants by labelling or treating them as 'troublemakers'; and
- c. provide dedicated reporting processes for women in police forces who experience inappropriate behaviour related to their gender.

Recommendation 16: Recruitment and retention of women in police forces

By September 2024, the College of Policing and the National Police Chiefs' Council should review and examine the conditions of female officers and staff in order to encourage more women to join the police and progress in policing careers. To ensure success, this should include a review of:

- a. working conditions that do not address the realities of modern working lives, including families where both parents are officers and share caring responsibilities;
- b. processes, training and refreshers for officers returning from parental leave; and
- c. kit, equipment and facilities designed largely by and for men.