

# PEEL spotlight report

Shining a light on betrayal

Abuse of position for a sexual purpose



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# Foreword

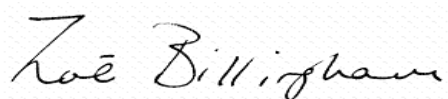
In dealing with this subject, it is crucial to make clear from the start that only a tiny proportion of police officers and staff abuse their position for a sexual purpose. The vast majority of police officers and staff are dedicated public servants who would never contemplate this inexcusable behaviour.

Nevertheless, even one instance of abuse of position for a sexual purpose is one too many. It is an appalling betrayal of often-vulnerable people, and can be devastating to those who fall prey to it. Although the numbers of people involved are small, forces must do all they can to prevent, detect and deal with this serious form of corruption.

We have been urging the police to act on this issue for some years now. Many forces have listened and are already making changes, but others have been far too slow. We have made some recommendations for what forces should be doing to deal with abuse of position. These include making sure they comply fully with their vetting requirements and that they have enough resources within their counter-corruption units to acquire intelligence more proactively.

Despite the action many forces are taking, abuse of position for a sexual purpose can still be difficult to detect. If you believe you are a victim, or you suspect someone you know might be, it is vital that you come forward so that this corruption can be rooted out.

Forces should reflect on the findings of this report and take action: to maintain the legitimacy of the police and, most importantly, to protect the public from predators who have no place in policing.



**Zoë Billingham**

**HM Inspector of Constabulary**

September 2019

# Summary of findings

We inspected how forces are tackling abuse of position for a sexual purpose in [2015](#), [2016](#) and [2017](#). Over this period, we found that most forces have been slow to take the steps necessary to root out this type of corruption.

During our most recent inspection, we have seen some encouraging progress and an improved understanding of the problem across the whole of the police workforce. We have seen 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](#). They carry out this work using relatively modest resources.

However, while we have found excellent work in some forces, others are lagging far behind. They haven't invested the necessary resources and they aren't proactive enough in looking for corruption. There are several areas where there needs to be further progress. Forces should:

- be more proactive in looking for the signs of officers and staff abusing their position for a sexual purpose;
- have enough staff to do this;
- have the right tools, such as monitoring software that allows them to easily see the records staff are accessing and the contact they have with victims and other [vulnerable people](#); and
- form more effective relationships with those agencies who support vulnerable people and who are most likely to become aware of the early warning signs of grooming before abuse takes place.

## Prevention

### **Overall, forces have good ethical cultures**

Forces 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.

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.

## **Too many people working in forces don't have the correct vetting**

We are still deeply concerned by the proportion of people working in forces who don't have the correct vetting. We are also concerned that some forces can't provide clear information on who is vetted, who isn't and what roles they occupy. There can be no excuse for shortcuts.

All forces agreed national standards for vetting in 2006. They have had over a decade to make sure everyone has the correct vetting. Some forces are in a very strong position and have taken the necessary steps. Others have not.

The government has recently announced a recruitment drive for 20,000 police officers over the next three years. With natural wastage as people leave the service, this means many more will need to be recruited to meet this target. This makes it even more vital that vetting units are fit for purpose, or they won't be able to cope with the demand and vetting standards may fall.

## **Understanding the threat**

### **Too many forces are recording corruption intelligence incorrectly**

The way in which forces record corruption intelligence needs urgent attention. Forces should categorise and store intelligence in line with nationally agreed criteria. Doing this consistently in all forces helps to build a picture of the threats forces need to address locally, regionally and nationally.

Correct categorisation is essential if forces are to understand the true extent of corruption and the threat this poses to them. This is crucial for informing forces' decisions about the nature and scale of resources they need to put in place. We repeatedly found examples of forces either not using the national corruption categories or using them wrongly. This will significantly hinder forces' ability to uncover the true extent of abuse of position.

## **Uncovering corruption**

### **Several forces can't monitor their workforce's use of ICT systems**

We were deeply concerned to find that several forces still don't have software in place to monitor how their officers and staff use information and communications technology (ICT) systems. We have recommended for several years now that all forces should have and use this software.

There is also confusion in forces that do have ICT monitoring software about how they can use the data it produces. This confusion needs to be resolved.

### **Too many forces have ineffective links with external agencies to uncover intelligence**

Some forces are good at working with external agencies to identify the warning signs of inappropriate behaviour. But others aren't doing enough to develop effective links with these agencies.

We were disappointed to find that 13 [counter-corruption units](#) (CCUs) still haven't forged links with the agencies who support vulnerable people. We found examples where the only engagement came in the form of a letter or through minimal presentations to senior managers. These don't constitute effective links.

The forces that have taken the appropriate steps have shown this to be a relatively straightforward task. Forces who haven't done this are missing vital information that could prevent officers and staff sexually abusing vulnerable people.

## **Taking action**

### **Many forces still don't have enough capacity in their counter-corruption units**

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.

### **Forces aren't proactive enough at communicating with the public about corruption**

Forces are generally reactive when reporting to the public about police corruption. They don't always take the initiative to tell people what has happened and what they have done about it.

### **Victims should be at the heart of any investigation**

It is important that victims feel supported throughout any investigation, including abuse of position for a sexual purpose. We didn't inspect how forces supported victims. But, during the course of our inspection, we found some good examples of victims being supported throughout the investigation process.

# About this report

The abuse of position for a sexual purpose of people who have come into contact with the police for help is abhorrent. All forces need to fully understand this type of offending, take all opportunities to identify warning signs and stop it from happening.

In our [previous spotlight report in May 2019](#), we described our concerns about the progress forces are making in tackling the problem. This report examines this important theme in greater detail.

We provide a national picture, drawing on the finalised findings from the 29<sup>1</sup> forces in the first two tranches of our integrated PEEL assessments, and the early findings from the third and final tranche of forces. Our methodology for these inspections is set out in appendix 1.

## What is abuse of position for a sexual purpose?

The [National Police Chiefs' Council](#)<sup>2</sup> (NPCC) defines abuse of position for a sexual purpose as:

“Any behaviour by a police officer or police staff member<sup>3</sup>, whether on or off duty, that takes advantage of their position as a member of the police service to misuse their position, authority or powers in order to pursue a sexual or improper emotional relationship with any member of the public.”

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<sup>1</sup> This includes the findings for Cleveland Police. We inspected this force as part of our third tranche. But the inspection findings were so worrying that we chose to publish the report sooner than we originally planned.

<sup>2</sup> [National Strategy to address the issue of police officers and staff who abuse their position for a sexual purpose](#), NPCC, 2017

<sup>3</sup> Including volunteers or staff contracted into a police role.

The abuse of position for a sexual purpose is serious corruption and should always be treated as such, regardless of whether criminal charges ensue. The offenders are mostly men and the victims are mostly women. Such abuse includes:

- sexual intercourse;
- sexual touching or sexual contact, whether or not it is initiated by the member of the public;
- requesting sexual favours in exchange for pursuing or not pursuing a police function (such as a speeding fine or an arrest);
- gratuitous sexual contact (such as inappropriate or unnecessary searches); and
- sexually inappropriate communications or unnecessary contacts for the purpose of developing a sexual or improper emotional relationship (using police or private communications systems).

The use of police information or systems to identify individuals with a view to pursuing a sexual or improper emotional relationship is also an abuse of position.

## The scale of the problem

Our 2016 legitimacy inspection found that nearly all forces have dealt with or were dealing with cases where there has been an abuse of position for a sexual purpose. In the last three years to 31 March 2019, the [Independent Office for Police Conduct \(IOPC\)](#) has reported that they have received 415 completed referrals for the category that relates to abuse of position for a sexual purpose (see appendix 2). From April 2016 to March 2017, in the year of our 2016 inspection, forces made 100 referrals. This increased to 172 in the following 12 months and 143 referrals up to 31 March 2019.

These figures are much greater than those from before 2016. We believe this is probably because forces are uncovering more cases of abuse of position, which is encouraging. The increase in cases being uncovered is likely to be in part a result of a [change in legislation](#) to clarify the criteria for mandatory referral to the IOPC and work the IOPC has done with forces. This came about following our recommendation regarding referrals to the IOPC in 2016. But the numbers underline the need for forces to recognise the scale of the problem.

Although the numbers have increased, they still represent a tiny proportion of the police workforce in England and Wales, which was 202,023 as of 31 March 2019.

CCUs must refer all serious corruption, including sexual misconduct, to the IOPC. The IOPC has a dedicated anti-corruption unit, which deals with sexual misconduct cases that require covert investigation. From the date of our recommendation in 2016 up to 31 May 2019, almost a quarter of all referrals to the anti-corruption unit at the IOPC related to sexual abuse of a vulnerable person by police officers and staff. The last three tri-annual national threat assessments by the National Crime Agency (NCA) have highlighted this as one of the major threats facing UK law enforcement.



## The effect on victims

### In the words of a victim

“I don’t think it will ever go away ... Even seeing a police car driving past ... I can feel my heart skip a beat.”

Abuse of position for a sexual purpose is devastating for victims. In 2012, [a joint IPCC/ACPO report](#) said it “fundamentally betrays the trust that communities and individuals place in the police”.

It can happen when people contact the police for help, at a time when they are emotionally vulnerable and seeking support. In these circumstances, they can be more susceptible to being taken advantage of by manipulative and ill-intentioned officers and staff.

There is clearly an imbalance of power between members of the public and police officers and staff.

### In the words of a victim

“Police officers have got immense power. You know, they can change your life in an instant, by what they believe and what they don’t believe about you. And he made me believe ... because of who he was, he impressed upon me that I was a willing party and that I was complicit.”

A member of the public doesn’t have to be vulnerable for the abuse of position for a sexual purpose to take place. However, the vulnerability of the victim may be seen as an aggravating factor. The NPCC strategy on abuse of position for a sexual purpose states that:

“Vulnerability may arise out of the citizen’s age, mental health, abuse of alcohol or drugs or their circumstances at a particular time, for example reporting a domestic abuse incident, being the victim of a crime, the suspect or witness in an offence, or suffering bereavement. However, vulnerability must always be considered in its widest sense and it should be recognised that victims of this kind of corruption often do not see themselves as victims or indeed vulnerable.”

Abuse of position for a sexual purpose can be extremely difficult to detect. One of the major difficulties in identifying it is that victims often don’t see themselves as having been abused or exploited. They have been made to believe they are in a relationship where they are not being exploited and it is very rare for them to come forward and tell the force.

Another aspect of this sort of corruption is that people can be very frightened. They are already a victim, and the abuser is a person with power. They don't think anyone will believe them.

#### **In the words of a victim**

"This officer had been turning up at my house. He tried to force himself on me, in uniform. I was scared I wasn't going to be believed."

For these reasons, it is extremely difficult to quantify how many occasions officers and staff abuse their position for a sexual purpose. Almost certainly, most cases go unreported.

As part of our work for this report, we spoke to some victims of abuse of position for a sexual purpose. They were supported by Rape Crisis England and Wales and local sexual violence workers. Their contributions have informed our findings and allowed us to convey their experiences in their own words. We are deeply grateful to them and to those who supported them.

#### **In the words of a victim**

"The police who are abusing their position, sexually and for other motivations, need to be stopped. Police forces need to be doing more."

# What should police forces be doing about abuse of position for a sexual purpose?

There are four main areas forces need to focus on:

- prevention;
- understanding the threat;
- uncovering corruption; and
- taking action.

We have based the structure of this report around these four areas.

## Prevention

Forces should create the right ethical culture for the workforce to operate in. To stop sexual exploitation, the workforce needs to be aware of the type of behaviour used to groom, manipulate and abuse vulnerable people. Force leaders should set and reinforce clear standards. Where there is abuse, officers and staff should be dealt with robustly and forces must learn from these cases to stop it happening again.

Vetting and checking the people who work in each force is the first line of defence against all forms of corruption. Effective background checks must be carried out on all people joining the service.

## Understanding the threat

Forces should categorise and store intelligence in line with nationally agreed criteria. Doing this consistently in all forces helps to build a picture of the threats forces need to address locally, regionally and nationally. Correct categorisation is essential if forces are to understand the true extent of the corruption and the threat this poses to them.

CCUs are expected to produce an annual strategic counter-corruption threat assessment. Forces should then use the analysis to:

- identify corruption threats and emerging problems;
- identify locations for corruptors and corrupt activity;
- profile potentially corrupt officers and corruptors; and
- identify potential individual and organisational vulnerabilities.

Forces should risk-assess the threat posed by people who may abuse their position for a sexual purpose.

## Uncovering corruption

The sexual exploitation of vulnerable people who have contacted the police for help can be extremely difficult to detect. So forces need to be proactive in rooting out this type of abuse. They need to take all opportunities to identify warning signs.

Forces should gather intelligence on abuse of position from their own staff. When cases of abuse of position for a sexual purpose come to light, it is common for staff to say they had previously noticed that the offender showed sexualised behavioural traits. To protect vulnerable people from such abuse, it is important that people feel comfortable to pass this information on to CCUs.

External agencies and organisations are another valuable source of intelligence to help identify those who sexually abuse vulnerable people. These are organisations that support, for example, victims of domestic abuse, sex workers, victims of sexual violence and those with mental health conditions.

When their staff are speaking to clients, they may become aware of officers and staff who are becoming overly familiar with the client. To be an effective source of information, they need to know the warning signs to look out for. Staff in those agencies must also have the confidence to report concerns, knowing they will be taken seriously.

Forces need to be using ICT monitoring effectively to detect misuse of their systems and the information they hold. They should also make the most of opportunities to examine data about how their staff use force systems and phones.

## Taking action

Forces need enough dedicated resources in their CCUs to proactively look for warning signs and develop intelligence. Uncovering signs of corruption will lead to an increase in demand and the need for more capacity as intelligence is developed and perpetrators brought to justice. But dealing with corruption at an early stage will help reduce the number of victims and may help reduce demand in the long term. It should also help reduce the overall effect of corruption and the significant costs often associated with lengthy and complex investigations.

Forces can increase public trust and confidence in policing through open and honest reporting. Making public the circumstances of cases where officers and staff have been dismissed sends a clear message that victims will be supported if they come forward. It raises awareness of this type of corruption and shows that the force is taking a robust stance.

It is important that victims feel supported throughout the duration of any investigation into abuse of position for a sexual purpose. Having some staff in the CCU with a background in protecting vulnerable people can help secure the best evidence from victims. Regardless of whether this approach is adopted, forces should always consider referring victims to other support agencies.

# Our findings: Prevention

## Reducing risk by establishing the right culture

All forces have made determined efforts to create the right ethical environment for the workforce to operate in. They have promoted the [Code of Ethics](#), which is at the heart of the [national decision model](#), widely used by officers and staff. This should mean everyone knows that an abuse of position for a sexual purpose, especially of vulnerable people, is completely unacceptable.

We found many examples of officers and staff, quite rightly, being dealt with robustly when cases were uncovered. Officers and staff were dismissed from policing or, where there was a criminal offence, were sentenced to lengthy terms of imprisonment.

Adopting this approach helps safeguard the public, reduces the risk of the workforce behaving unacceptably and promotes public trust and confidence.

In 2017, the National Counter Corruption Advisory Group (NCCAG) produced a national strategy to address the abuse of position for a sexual purpose. The strategy contains guidance on prevention, intelligence, enforcement and engagement. We found good knowledge of this within all CCUs and an improved approach since the publication of the strategy.

## Values and the Code of Ethics

Force leaders are making good efforts to set and reinforce clear standards. They continue to promote the Code of Ethics, their own force values and expected standards of professional behaviour.

The Code of Ethics is about self-awareness. It aims to make sure everyone in policing always feels able to do the right thing and is confident in challenging colleagues irrespective of their rank, role or position. Forces promote the code through a variety of methods such as webchats, blogs and staff training. To reinforce the expected standards of behaviour, much of the training uses examples of how vulnerable people have been sexually abused.

## Raising awareness

We generally found officers and staff had a good awareness of why it is inappropriate to form sexual relationships with vulnerable people they have met through their work. Forces use a variety of methods to give guidance to staff about inappropriate interactions with members of the public.

To stop sexual exploitation, the workforce needs to be aware of the type of behaviour used to groom, manipulate and abuse vulnerable people. If forces are to effectively combat this offending, it is essential that the entire workforce knows the professional boundaries expected when they interact with the public. Awareness raising not only allows staff to regulate their own behaviour, it also allows them to judge whether their colleagues' behaviour is or is not acceptable.

A good example of the type of training materials used by forces to raise awareness comes from Cheshire Constabulary. The force has used the shocking transcript from a police interview of a victim of sexual abuse by a police officer to produce a training video.

The officer attended the victim's home address because the victim had reported a neighbour dispute. This was the first time the officer had met this vulnerable member of the public. The video vividly illustrates the devastating effect this type of abuse can have.

### **In the words of a victim**

"He said, 'When I have been flirting with you like this, you can't just shake my hand. Give me a hug'.

"So I thought, well, I didn't know if that's what coppers did. So, anyway, I hugged him and as I stood back he started to say about the reaction I was having on a member of his anatomy – he started to talk about his crotch. He said he couldn't believe how hard he was getting, and how I was a good looking young attractive ... female.

"He said, 'If I wasn't married, I'd take you in the bedroom and rip your clothes off. And we would be in there the best part of the afternoon.' I felt very uncomfortable. I felt sort of awkward about it. I don't know – again, it's someone in uniform, it's not what you expect. He tried putting his hand on my side and he was being quite flirty again. He said he would come around often."

The continued emergence of cases prompted the College of Policing to issue [guidance in 2017](#). This focused on maintaining a professional boundary between police and members of the public. The guidance sets out the broad principles to support decision making and professionalism. It states:

"Do not engage in, or pursue, a sexual or improper emotional relationship, on or off duty, with any member of the public who you have come into contact with during the course of your current work or duties."

It also says that officers and staff should not use their own personal contact details (for example, social media accounts and private mobile phones) to contact members of the public. Officers and staff are encouraged to seek guidance and advice if they are unsure about whether their actions could put them at risk of abusing their professional position.

Despite this guidance, we were disappointed to find six forces where the understanding and knowledge of this were limited. In one force, staff were confused and did not distinguish between this type of abuse and sexual harassment in the workplace. In another force, supervisors had briefings to help their understanding, but the wider workforce only had limited information about the abuse of position for a sexual purpose. In two other forces, we found some supervisors had no knowledge or understanding of this type of behaviour and the force stance on it.

Levels of awareness and understanding in some teams vary across forces. Worryingly, this variation included some staff working in specialist sexual offences investigation teams and others in detective supervisory posts. For almost a decade, the exploitation of vulnerable people for sex by police officers and staff has been identified by the NCA as one of the biggest corruption threats to UK policing. It is unacceptable that staff in some forces don't have an awareness of this type of corruption.

### **Learning from previous cases**

Where there is abuse, forces must learn from these cases to stop it happening again. Currently, 41 out of 43 forces are effectively using learning from previous cases to protect members of the public and raise awareness in their staff. Forces have various ways to identify how they can learn. This learning comes from cases they have dealt with, from other forces and from sources such as the IOPC.

Forces also use ethical dilemmas as a way to raise awareness and encourage staff to consider how they would deal with different types of situations and incidents. This type of training is generally made available to all staff. In some forces, it is part of ongoing awareness raising for staff.

For example, Kent Police posed this scenario of potential abuse of a vulnerable person:

“An officer has a chance meeting with a domestic violence victim on a night out six months after he attended an incident at her home address. Is it okay to strike up a relationship/friendship with her via social media etc.?”

Responses from the workforce varied. This showed a worrying lack of knowledge and, in response, the force carried out training force-wide. After the training, the force then posed a second scenario to officers and staff and the results showed a much better understanding.

Some forces use video scenarios specifically about the inappropriateness of forming intimate relationships with vulnerable people. Other forces give information about abuse of position, data misuse and integrity policies. South Wales Police put this type of information into an 'ethical passport'. Durham Constabulary has produced pocket-sized Z-Cards that include information about sexual harassment in the workplace.

We also saw several 60-second animated videos covering a range of integrity issues. Forces have developed these with private companies to raise staff awareness. This is an innovative and engaging method to reinforce standards of behaviour with the workforce. The videos cover abuse of position for a sexual purpose; sexual harassment in the workplace; inappropriate associations; drugs and alcohol misuse; and business interests.

### **Guidance on appropriate relationships**

To protect officers and staff from the negative influences inappropriate relationships can have, most forces have a notifiable associations policy. This tells staff to inform the force of certain personal relationships. This includes people who have been convicted of a criminal offence, people under criminal investigation and people dismissed from the police service. Once notified, the force can issue the officer or staff member with guidance to protect them from potential corrupt influences.

In 2017, Lancashire Constabulary updated its notifiable association policy. It now includes a requirement for employees to inform the force of any personal relationships with members of the public formed during their duties. This approach reinforces the need to think before attempting to form personal relationships. It also allows the force to give guidance on relationships formed after on-duty meetings. This is something we urge other forces to consider.

### **Integrity health checks**

Some forces reinforce ethical standards well through an annual [integrity health check](#). Supervisors go through a series of questions prompting discussions with staff about ethical issues. South Yorkshire Police's integrity health check has these elements:

- a discussion about inappropriate relationships with people they have met during their work;
- any outside business interests they may have;
- any notifiable associations they have;
- standards of behaviour; and
- other integrity issues such as unmanageable debt, substance misuse and inappropriate use of force systems.

At the end of the discussion, the member of staff and supervisor sign the health check to show they have discussed each of these elements. We believe this is a good way of having regular and open discussions about how those entrusted with the responsibility of law enforcement should behave.

### **Ethics committees**

[Ethics committees](#) help establish ethical cultures by encouraging staff to talk about and challenge organisational norms and assumptions. Most forces have ethics committees but not everyone in each force knows how to make the most of them.

If forces are to truly challenge cultural problems, they need to review how they use ethics committees. They should consider the composition of the group, how the workforce uses the committee and how the force publishes the outcomes.



There is no standardised approach to what ethics committees should look like or how they operate. Some forces have ethics committees whose attendees are from within the force and others have a meeting that has both internal and external membership. Senior police officers chair some committees and external independent people who have an academic background in ethics chair others.

We were pleased to find that most forces (36 out of 43) have some form of ethics committee. But in 17 of the 36 forces that have committees, staff didn't know how to refer matters into their panels. In 17 of the 36 forces, staff didn't know how to find the outcomes from the discussions that took place at the ethics committee.

### **Inappropriate behaviour in the workplace**

Inappropriate comments or overly sexualised behaviour in front of colleagues could also be indicators of inappropriate behaviour with members of the public. Another potential indicator is sexual harassment in the workplace. [Research carried out by Unison in 2016](#) revealed "high levels" of sexual harassment towards police staff. Reports of sexual harassment should not be treated in isolation.

Abuse of position can also take the form of a power imbalance between two colleagues where one person feels obligated or pressurised into a relationship. This could be, for example, a training sergeant having a relationship with a student officer.

In 2019, the [College of Policing published guidance](#) on appropriate personal relationships and behaviours in the workplace. Its aim is to raise awareness of how relationships can affect fairness at work. It also helps staff and officers who are in a relationship recognise when a conflict may exist.

Those with national policing responsibilities need to do further work to understand better the links between these types of behaviour and how the same officers and staff treat members of the public.

### **Vetting: the first line of defence**

Vetting and checking the people who work in each force is the first line of defence against all forms of corruption. Forces must carry out effective background checks on all people joining the service. There can be no excuse for shortcuts. We are still deeply concerned by the proportion of people working in forces who don't have the correct vetting; some forces are still unclear on this.

All forces agreed national standards for vetting in 2006, so they have had over a decade to make sure everyone has the correct vetting. Some forces have taken the necessary steps and are in a very strong position. Others have not.

The government has recently announced that the service will recruit 20,000 police officers over the next three years. With natural wastage as people leave the service, this means many more will need to be recruited to meet this target. This sharpens our concerns that vetting units must be fit for purpose or they will be unable to cope with the demand and vetting standards may fall.

Vetting checks can only ever be a snapshot in time. People's circumstances change in ways that can affect their suitability to work in or alongside a police force.

Through vetting, forces must make sure those people already employed, and those who come in new to policing, don't have backgrounds that suggest they will exploit or sexually abuse vulnerable people. Forces should know who is vetted and who isn't, and what roles they occupy. They also need to know about the background of people who transfer between forces.

### **Case study**

A court described a PC as someone who had joined the police "to gain the keys to a sweetshop". He met a 13-year-old girl after answering a call to a domestic incident. He contacted her on social media, exchanging sexual messages and photos, returning to her home three days later. He drove her to a country lane, where he filmed himself raping her.

The applicant had passed the vetting process in October 2016. Before he was appointed as a police officer, a complaint of rape had been made against him in 2017 in another force area. His recruitment was put on hold. When no further action was taken against him, the force resumed his recruitment application but didn't revisit his vetting. Unknown to the force, two further complaints of sexual offences against children had been reported against him to neighbouring forces. Further vetting checks would have revealed this.

Six months after joining the police, he met his victim. He was jailed for a total of 25 years, for 37 different offences.

### **Vetting in 2018**

Not all force vetting units can easily identify the current vetting status of all the force's staff and officers. They don't all know which posts need enhanced vetting or who currently occupies those posts. However, we were reassured to find all forces vet new recruits before they are appointed.

In our 2016 PEEL legitimacy reports, we recommended that all forces should have in place achievable plans to fully implement the 2006 national vetting standards and to vet all staff by December 2018. For our inspection, we asked forces to tell us the total number of unvetted staff they had in their workforce regardless of when they joined. Seventeen forces reported to us that they had more than 13 percent of the workforce who didn't have current vetting. These included forces who reported figures as high as 37 percent, 42 percent and 52 percent of their staff not having current vetting. At the time of our data collection in May 2018, five forces gave us data that didn't meet the standards of our data return. All 5 have since provided usable data. We are concerned and disappointed by these problems, given how long forces have had to resolve them.

We were even more concerned to subsequently find some of the reported data to be inaccurate. Some forces hadn't included in their figures people whose vetting had expired. A person whose vetting has expired is no longer vetted. Some forces had only reported people who joined before 2006 and had never been vetted. People who

have never been vetted and those whose vetting is no longer current should have been reported in the same way.

Our work in some other forces reporting low levels of unvetted staff showed that the problem ran deeper than just not including the number of staff who needed re-vetting. The figures they reported revealed that some didn't have a full understanding of who needed vetting. One force reported that everyone had current vetting. However, during our inspection, we found that hundreds of people needed to be vetted. We found that another force was significantly deviating from the national vetting standards to reduce the burden on its vetting unit. This is unacceptable; everyone should be vetted to the national standards.

We asked forces about the posts that needed to have the higher-level management vetting (MV). Many of these posts deal with vulnerable people. All forces were able to identify the departments where some posts would need the MV level. But many vetting managers weren't aware of which specific posts within those departments needed this. Nor did they know who occupied those posts. This puts vulnerable people at risk.

All force vetting units should be able to easily identify the current vetting status of all staff and officers. They should know which posts need enhanced vetting and they should know who currently occupies those posts. We will be asking forces to supply this information for our 2020 inspection. Forces either need to fully address the problems with vetting or a national vetting unit should be considered.

### **Sharing information to improve vetting**

The exchange of information about people who have been dismissed from the service is good. The College of Policing maintains the 'barred and advisory' lists. The barred list contains details of people who have left because of misconduct and aren't allowed to re-join the police service. It includes those dismissed and those who resign or retire while under investigation and later have a gross misconduct case against them proven. The advisory list holds information on those who are currently under investigation for gross misconduct and have resigned or retired. The details of the person under investigation are held on the advisory list until the case has been finalised.

We were reassured to find that all forces informed the College of those officers and staff who had left policing due to misconduct. All force vetting units used the lists as part of their vetting checks for new employees.

### **Transferees**

We were surprised to find that there is no requirement to vet officers who transfer between forces, although we did find examples of forces who did this.

Some forces and some members of our external reference group highlighted their concerns about officers who transfer between forces. Whereas most transfer for valid reasons, anecdotal evidence suggests that some are later subject to serious allegations, including sexually abusing vulnerable people. Although there is no recorded data for this, we were concerned to find that, if a person is vetted in one force, there is no national requirement to re-vet them on transfer to another force.

Also, there is no standard way of passing on 'soft' intelligence about things such as complaints, corruption intelligence or performance.

We believe that, as part of the transfer process, all the relevant information about that individual should be passed between forces. Also, as vetting is a snapshot in time, we believe all transferees should be re-vetted. This should allow a force to make an informed decision as to the transferee's suitability to move force and what role is suitable for them. Given the proposed 20,000 increase in police numbers over the next three years, we expect there to be a significant increase in transferees between forces. This is because forces will explore all means for recruitment.

## Recommendations

### All officers and staff should have the suitable vetting status for their role

All 43 forces agreed national vetting standards in 2006. It is not acceptable that there are still people working in forces without the correct vetting for their role.

We are deeply concerned about the confusion in some forces as to the vetting levels required for some roles, and how many people still need their vetting status updated. Forces need to address this swiftly, and before the demands on vetting units increase with the expected focus on police recruitment.

Forces require information to vet their officers and staff. Forces gather information on their personnel and use this to assess their risk of corruption. When people transfer forces, the force they are being transferred to should be sent information in a standardised format.

#### Recommendation 1

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.

#### Recommendation 2

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.

# Our findings: Understanding the threat

## Recording corruption correctly

The way in which forces categorise corruption intelligence needs urgent attention. Forces should categorise and store intelligence in line with nationally agreed criteria. Doing this consistently in all forces helps to build a picture of the threats forces need to address locally, regionally and nationally. Correct categorisation is essential if forces are to understand the true extent of corruption and the threat this poses to them.

When a force CCU receives information that indicates corruption, they should record this under one of 12 categories that have been agreed nationally. Sexual misconduct is one of the corruption categories and abuse of position for a sexual purpose sits within that. The 12 categories include such things as disclosure of information, drug supply and misusing force ICT systems. Three of the categories are designed to collate information that may indicate a person could become a corruption risk in the future.

We asked each force to identify 100 items of information that fell under nine of the main corruption categories. We were concerned to find that 25 of the 43 forces were either not using the national corruption categories or weren't categorising information correctly. This will seriously affect the quality of forces' understanding of the threats they face from corruption. It makes it harder to aggregate information into regional and national threat assessments.

We repeatedly found that abuse of position cases were being wrongly categorised. We found other cases where behaviour was categorised as sexual misconduct when it clearly wasn't. The failings were generally in the categorisation of off-duty incidents as sexual misconduct, and the recording of abuse of position for a sexual purpose in other corruption categories.

Sexual misconduct by a police officer or member of police staff only constitutes corruption if it is linked to their professional role – for example, a police officer having a sexual relationship with a crime victim they have met through their role. Sexual misconduct while off duty (for example, while on a night out with friends) may be a crime but wouldn't constitute police corruption.

We found many examples of abuse of position being wrongly categorised as abuse of authority, one of the other corruption categories, which is not linked to sexual misconduct.

It is essential that forces correctly record all cases, so that the whole police service knows the true extent of the problem and can rely on accurate corruption threat assessments.

## **Corruption threat assessments**

CCUs are expected to produce an annual strategic counter-corruption threat assessment. They should then use the analysis to:

- identify corruption threats and emerging problems;
- identify locations for corruptors and corrupt activity;
- profile potentially corrupt officers and corruptors; and
- identify potential individual and organisational vulnerabilities.

We were disappointed to find that 26 forces either didn't have a current local strategic CCU threat assessment or had one that we judged to be unsatisfactory. This means that these forces won't have a clear understanding of the threats they face. It also means that the national threat assessment will be based on incomplete information.

Forces send their corruption data to the National Crime Agency (NCA) every three years. The NCA then assesses and amalgamates the information to produce a national threat assessment for policing.

From 2020, the NCA has agreed to produce national threat assessments annually (rather than every three years) so that they are more up to date. Each force will complete its own assessment, which will be collated first regionally and then nationally. The need to have a standardised and accurate threat assessment is vital.

## **Risk matrix**

We found that forces were using various ways to risk-assess the threat posed by people who may abuse their position for a sexual purpose.

There is a national risk matrix, which the NPCC produced. This considers a variety of factors linked to the abuse of position and places a weighting against them. These are then totalled up and the higher the score, the greater the risk the person is perceived to pose. Many forces have refined this and developed their own matrix. This means forces aren't using a standardised approach.

The NCCAG is currently doing a national review of the matrices forces are using to see if there is an example that can be used nationally. We support this review, which will help forces decide what action to take in response to different levels of risk.

# Our findings: Uncovering corruption

## Gathering intelligence from the workforce

A source of information for forces about the sexual exploitation of vulnerable people can be their own staff. When cases of abuse of position for a sexual purpose come to light, it is common for staff to say they had previously noticed that the offender exhibited sexualised behavioural traits. To protect vulnerable people from such abuse, it is important that people feel comfortable to pass this information on to CCUs.

It was encouraging to find all forces have internal reporting lines and confidential email addresses where information can be passed in strictest confidence. In most forces, this can also be done completely anonymously.

Forces encourage staff to report suspected wrongdoing to their line managers, CCUs or [professional standards departments](#). There is no preferred mechanism for reporting. It depends on the person and the nature of what they are reporting. When we reviewed cases, we found that some staff wanted to stay anonymous and didn't want to raise their concerns with their supervisor. Others were concerned about the culture the supervisor had created which didn't encourage them to report their concerns. We found some cases where it was the behaviour of the supervisor that was the cause of staff concerns.

We want forces to create an environment where all staff feel able to report concerns even if they are just suspicions. Whatever forces do, there will always be circumstances when people prefer to report via a confidential reporting line. All forces had a confidential reporting system. In 41 of 43 forces, staff were aware of the methods to report concerns about colleagues. Those staff were also confident in the integrity of the anonymous method. In the other two forces, staff were either unaware of the confidential reporting line or lacked confidence that they could give information without being identified. Forces should raise awareness of these and build trust in their use to encourage reporting.

## Gathering intelligence from external agencies and organisations

External agencies and organisations are another valuable source of intelligence to help identify those who sexually abuse vulnerable people. These are organisations that support, for example, victims of domestic abuse, sex workers, victims of sexual violence and people with mental health conditions.

## **Working together to identify the warning signs**

Some forces are good at working with external agencies to identify the warning signs of inappropriate behaviour.

When their staff are speaking to clients, they may become aware of officers and staff who are becoming overly familiar with the client. To be an effective source of information, they need to know the warning signs to look out for. Staff in those agencies must also have the confidence to report concerns, knowing they will be taken seriously.

We found several good examples of forces asking agencies to look for officers and staff who are going beyond their normal duties. The warning signs they were asked to look for are:

- regularly visiting people after incidents are concluded;
- giving personal contact details to vulnerable people;
- using social media to contact people;
- contacting vulnerable people while off duty;
- becoming extremely familiar;
- lavishing excessive praise or gifts; or
- repeatedly contacting people with calls and texts.

We recognise that many officers and staff go beyond their contractual requirements because they are committed to their work and are dedicated public servants. But, in some cases, these warning signs can be the first stages of grooming. Where vulnerable people don't see themselves as victims but reveal information to agency staff, the staff are often better able to interpret the signs and make forces aware of their concerns.

## **Developing effective relationships**

Some forces aren't doing enough to develop effective links with external agencies who support vulnerable people.

All forces will already have some form of working relationship with the relevant groups, which include statutory and voluntary agencies and organisations. However, guidance given by the NCCAG outlines the expectation that CCUs should also form their own links. The external agencies may have limited resources. Therefore, the CCUs will need to invest their own resources and time for the links to be truly effective. CCUs should make regular contact and provide updates when new staff join these organisations. This is to help the staff feel confident in passing on information, no matter how small their concerns may be.



In previous reports, we also have urged CCUs to develop effective relationships with agencies who support vulnerable people. In 2017, we assessed force plans to do this. We found that only two forces had full engagement through their CCUs with agencies who support vulnerable people. Of the rest, 21 had started to speak with other agencies. Another 14 forces were working on their plan. But six forces didn't give us any details of their plans for how they were going to make effective links with external agencies.

We were disappointed to find that 13 CCUs still haven't forged links with the agencies who support vulnerable people. We found examples where the only engagement came in the form of a letter or through minimal presentations to senior managers. These don't constitute effective links. The forces that have taken the appropriate steps have shown this to be a relatively straightforward task. Forces that haven't done this are missing vital information that could prevent vulnerable people being sexually abused.

### **In action: links with external agencies**

**South Yorkshire Police** provided an example of how it had encouraged those in other agencies to look out for warning signs. The force held a one-day conference and invited over 80 practitioners from external agencies to inform them about abuse of position for a sexual purpose. Within 24 hours of the conference, one agency contacted the CCU with some intelligence that the force was able to investigate. The person who reported their concerns said that if they hadn't attended the conference they probably wouldn't have been concerned by the officer's behaviour. The CCU now keeps regular contact with these agencies.

**Cheshire Constabulary** regularly speaks to staff in other agencies. After a training presentation by the force, a mental health support worker gave information to the CCU about an officer and a vulnerable woman.

Members of the public must also feel confident in reporting any concerns. Information can be passed direct to forces or via [Crimestoppers](#). Forces should use the outcomes of abuse of position cases to encourage the public to come forward. Effective public engagement will help encourage more people to report police corruption (see the 'Keeping people informed' section).

### **Monitoring ICT systems**

Not enough forces are able to monitor the use of their ICT systems. Police forces hold large amounts of personal data and operational information on a wide range of ICT systems. The public expects that this information is held securely and is only used for a legitimate policing purpose, not misused by police officers or staff.

Forces need to be effective in proactively detecting misuse of their systems and the information they hold. Officers and staff who seek to sexually exploit vulnerable people regularly misuse force ICT systems. Through these systems, they can see personal records including, in some cases, photographs of a wide range of vulnerable people. These include people who have been arrested, victims of crime such as domestic abuse and other vulnerable people including those who have substance misuse problems or regularly go missing from care.

The better forces have protective monitoring software that automatically records the details of people using force systems and what information they access. They can then easily and swiftly scrutinise how people are using systems. This includes access through desktop computers and handheld devices. Our 2016 recommendation included the need for forces to have systems monitoring software.

In 2017, our review of force plans found four forces that had the ability to monitor all their ICT systems. Another 16 forces had started to implement a plan to use ICT monitoring and 14 forces were working on their plans. But nine forces didn't give us details of how they were going to put ICT monitoring in place.

Keeping pace with changes in ICT has proved difficult for policing. Forces that could previously monitor their ICT systems have found it increasingly difficult as they have given their workforce remote access to information. Working with ICT suppliers, some were able to find a way round this. But as technology has moved on and operating systems have changed, this has become more difficult.

To monitor their ICT systems, forces currently engage with independent software suppliers. There are many problems with this. The independent suppliers have to be able to access the different ICT systems forces use as well as deal with the international companies who produce the software and hardware. There is currently no agreed national standard or approved list of suppliers for ICT monitoring software.

Thirty-one forces don't yet have full ICT monitoring on their systems. This is for various reasons, including not yet having bought any ICT monitoring or having difficulties in using the software. This is very disappointing.

We accept that there are some factors that are beyond the control of individual forces, such as how monitoring software works with the operating systems of some devices. The Home Office and the NPCC national lead for counter corruption need to work together to find a solution here.

But, despite these difficulties, some forces are clearly not taking all the steps they can in this respect. They urgently need to address this.

### **Legal use of police data**

Many forces aren't making the most of opportunities to examine data about how their staff use force systems and phones. The use of such data gathered using ICT monitoring software has been tested in the criminal courts and through the misconduct processes. But some forces who have ICT monitoring software in place aren't making full use of this data.

Forces have different interpretations of the law governing how they can use this information. Some forces have introduced bureaucratic authorisation processes to access monitoring information. Some CCU staff told us the law prohibited them from seeing who had accessed certain types of information linked to vulnerable people on their force systems. This is despite other forces successfully using such information to detect corrupt activities and prosecuting offenders as a result. We also found examples of forces limiting themselves to using ICT monitoring information only if they already had reasonable suspicion of people accessing information inappropriately.

Some of this confusion appears to have arisen where forces allow combined official and personal use of smartphones. Some forces give officers and staff these devices for official use but also allow them to make personal calls and send texts free of charge.

We have real concerns about how police officers and staff use force devices for personal calls, text messaging and internet use. These devices need to be monitored, as they can access highly sensitive police ICT systems. Everyone involved needs to recognise the need for effective monitoring, in circumstances where it isn't possible to differentiate between personal and professional use. Police forces need to avoid giving their people privacy assurances that are too wide and may prevent forces from monitoring devices effectively. If police officers and staff have concerns about their privacy, they would be better off using their own devices for personal matters.

The police service, through the NCCAG, has started to standardise its approach to the use of ICT monitoring information. We encourage them to complete this work.

### **Use of encrypted apps**

To improve communication and engagement, forces are using new and varied ways for officers and staff to communicate with each other, with people working in other agencies, and with the public. We recognise that such improvements can lead to police forces becoming more efficient.

We found encrypted apps such as WhatsApp on force-issue phones. We found examples of sensitive police information being shared through WhatsApp to the private mobile phones of other on-duty officers.

Forces that don't monitor the sensitive information officers and staff are viewing on force mobile phones create an exceptionally high risk for themselves. The use of encrypted apps can make monitoring harder. Forces need to reassure themselves that they understand all the risks of having encrypted apps on force-issue phones. They then need to take steps to mitigate those risks.

## Case study

A family member of a victim of domestic abuse was concerned with the large number of texts the victim was receiving from a PC.

A check on the officer's force-issued phone revealed an extremely high number of contacts with 13 different women whom the force considered vulnerable. They had all contacted the police for help after domestic abuse or harassment, because they had witnessed crime or were working in the sex trade. The review showed that, during a four-month period, the officer was a 'prolific sender of texts' on his force-issued phone. He was arrested, and the women contacted. Four of the five victims who made statements to the CCU believed they were in a real relationship. They were unaware of each other and the fact the officer was married.

The CCU investigation found that the officer had used his force mobile phone to contact sex workers on hundreds of occasions. In one day alone, while on duty, the officer made 399 contacts with a domestic abuse victim. He also contacted another woman 575 times while he was off sick. He contacted another victim of domestic abuse 699 times in a little over two months.

The officer then gave the women his personal mobile number and went on to send naked photographs of himself, one of which was from within a force locker room.

At the time of this case, the force couldn't monitor the use of force-issued phones.

The officer was charged with five counts of corrupt/improper exercise of police powers and privileges by a constable. In July 2019, he pleaded guilty and received 14 months' imprisonment.

## Recommendations

### All forces need the tools and commitment to uncover corruption

The abuse of position for a sexual purpose can be hard to detect. That is why forces need all the information they can gather to fight it. National assessments of the scale of the problem are built on the information gathered, stored and shared by forces.

There are already established ways of collating and sharing the information, but all forces should use them consistently. Forces can achieve more through building relationships with organisations that support vulnerable people. These agencies can help build trust in those who don't feel able to report on their own and can provide valuable information to police forces.

Technology offers myriad opportunities to policing. But if forces are to protect their information from the tiny minority of corrupt officers, they need effective methods of monitoring the use of devices and the access to their databases.

### **Recommendation 3**

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.

### **Recommendation 4**

By April 2020, all forces that haven't yet done so should:

- 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.

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.

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.

# Our findings: Taking action

Forces need enough dedicated resources in their CCUs to proactively look for warning signs and develop intelligence. But many forces still don't have the capacity they need.

Apart from the profound effect of abuse of position for a sexual purpose on victims, forces need to consider the other practical implications of looking for corruption. In the first place, uncovering signs of corruption will lead to an increase in demand and the need for more capacity as intelligence is developed and perpetrators brought to justice. But dealing with corruption at an early stage will help reduce the number of victims and may help reduce demand in the long term. It should help reduce the overall effect of corruption and reduce the significant costs often associated with lengthy and complex investigations.

## Resourcing of counter-corruption units

There aren't enough resources in a large number of CCUs.

There is no straightforward formula for deciding the right resourcing levels for a CCU in any given force. We have commented on this in previous reports since 2011, urging forces to make sure they have "adequate resource levels".

We assessed whether forces were able to look for and then develop corruption intelligence effectively. If the force had ICT monitoring software in place, we assessed whether it had the capacity to use it to its full potential. Our judgment about whether the CCU had enough resources was based on these three elements.

We have voiced our concerns about poor resourcing levels within CCUs repeatedly in recent years. In [our 2011 report on police relationships](#), we highlighted how the need to make savings had the potential to undermine the capacity and capability of CCUs. Since then, in most years we have asked forces to consider their investment in their CCUs. In our 2016 PEEL legitimacy report, we again highlighted capacity and capability in a national cause of concern. We recommended that, within six months, forces should have started to implement a plan to address our concerns.

In our review of those plans in 2017, we were disappointed to find that almost half (21 of the 43 forces) didn't have any reference to reviewing staffing levels. There was some mention of capacity or staff capabilities in nine plans, but these had either not started to change things or didn't give us enough information to assess their progress. The other forces either had enough staff in their CCUs or had begun to address shortfalls. We told all forces that we would be inspecting this area again in 2018/19.

It is disappointing that, yet again, we have found that many forces still don't have enough capacity in their CCUs. Of the 43 forces, we judged that 32 didn't have enough staff to be effective. Some forces disagreed with our assessment. They said they had the capacity to deal with the items of intelligence on corruption they were receiving. They believed it would be inefficient to increase the number of staff in their CCU. But another element of our inspection assessed how proactive forces are in looking for corruption. We found that 31 of the 32 forces weren't proactively looking for corruption intelligence. They would simply react to things they were told. The other force was doing extremely limited proactive work.

The NCCAG conducts an annual benchmarking exercise to identify the resources in CCUs. Some forces reported staff numbers to the NCCAG that were greater than those we saw during our inspection. The figures show huge differences in the number of staff within CCUs for similar size forces. For example, one force with an establishment of just over 3,000 personnel reported that it had 15 staff working in the CCU. A combined CCU covering two forces with a total workforce of over 10,500 personnel said it had eight CCU staff. The rationale for the difference in resourcing levels is unclear. The NCCAG produced the following table to show the different resourcing levels:

<b>Force size (staff members)</b>	<b>Average staff numbers for CCU</b>	<b>Range between</b>
Under 2,000	6.9	5 and 8
2,000–3,000	5.6	3 and 9
3,000–4,000	8.6	6 and 15
4,000–5,000	9.5	4 and 18
5,000–6,000	12.1	7 and 22
Over 6,000	23	8 and 60

### **Other requirements on CCU staff**

We have highlighted the need for forces to engage through their CCUs with other agencies who support vulnerable people. CCUs also need sufficient staff to give training and guidance to the workforce to highlight the importance of the role they play in tackling the abuse of vulnerable people. The more successful these initiatives are, the more likely staff will send information to the CCU. And, of course, this information will not necessarily only be about the abuse of position for a sexual purpose – CCUs must continue to focus on all elements of police corruption.

### **Recommendation**

#### **Forces need to have enough resources dedicated to act against corruption**

It is not good enough to wait until someone reports corruption. Forces should proactively look for those within their organisations who seek to abuse their position. Forces need to invest resources into tackling corrupt officers and staff.

It is important to have enough people working in CCUs. They also need the right blend of skills to conduct this difficult work. It is hard to investigate officers and staff who have a good knowledge of the law and investigation techniques. It is also difficult to gain and maintain the trust of those who are victims of this type of abuse. CCUs need enough staff with the right skills to be proactive in finding those abusing their position.

### **Recommendation 5**

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.

## **Keeping people informed**

Public trust and confidence in policing can be increased through open and honest reporting. Making public the circumstances of cases where officers and staff have been dismissed sends a clear message that victims will be supported if they come forward. It raises awareness of this type of corruption and shows that the force is taking a robust stance.

But we have found that forces don't always take the initiative to tell people what has happened and what they have done about it.

### **In the words of a victim**

"I regularly follow [the local force website], and nationally, what cases and why, and you can see where some forces are much more open, and accountable, and they're taking more action. And then you can see what [my local force] is doing, [they] don't like to publicise too much unless [they] have to."

## **Support for victims**

Victims should be at the heart of any investigation. It is important that they feel supported throughout the duration of any investigation, including abuse of position for a sexual purpose.

This inspection examined how forces prevent the abuse of position for a sexual purpose and how they respond to cases they identify. We didn't inspect how forces support victims. But, during the course of our inspection, we found some good examples of victims being supported throughout the investigation process.

It is essential that victims are encouraged to come forward. Forces should work with those agencies that have experience in supporting vulnerable victims throughout the process, from the first contact to the conclusion of the case. And support should remain available for those victims who need it beyond any criminal justice or misconduct outcome.



## **In action: supporting victims**

**Norfolk Constabulary** has excellent links with organisations that support vulnerable victims. A dedicated member of staff from Victim Support works with victims throughout an investigation, at any hearing or court appearance, and beyond. This is available for victims in both criminal and misconduct cases. The victims are supported both practically and emotionally. They are also helped to prepare for the court process. This helps make sure they give the best evidence possible, and such cases are more likely to reach a positive conclusion. One of the cases we reviewed had been initiated by information received from a sexual abuse support worker. We found this approach worked well.

**South Yorkshire Police** makes sure that, in abuse of position cases, the initial contact with a victim can be done in different ways. These include the use of an intermediary or support worker if the force decides it is the most appropriate method, as opposed to a police officer making the first contact. This has helped victims feel more comfortable in coming forward and speaking to CCU staff. We were pleased to hear that the support continues throughout the whole investigation and beyond. The force signposts victims to other agencies who can help them once police contact ends.

Protecting vulnerable people can be an extremely complex aspect of policing. South Yorkshire Police has found that having some staff in their CCU with a background in protecting vulnerable people has helped secure the best evidence from victims.

## **Public reporting**

Cases involving the sexual abuse of a vulnerable person by a police officer or a member of police staff can often receive significant media attention. The cases that do receive this attention tend to be the more extreme criminal cases, often involving misconduct in a public office, that end in crown court trials. The police service also deals with many other cases where criminal conduct can't be proved but the behaviour of the employee is totally unacceptable. Forces deal with these through misconduct regulations.

To make the misconduct system more open, forces are legally obliged to hold almost all gross misconduct hearings for officers in public. Forces must advertise the hearing, so the public can attend if they want to. The hearings are chaired by independent legally qualified chairs (LQC). The LQC may decide to hold the hearing in private. These cases could involve, for example, vulnerable witnesses. The findings of these cases must be published on the force website. However, misconduct regulations don't apply to police staff.

The conclusion of trials at court presents opportunities for forces. They can use the details of cases to send a strong message to both the public and their own workforce – especially to those who think it is acceptable to groom and abuse vulnerable people. Public reporting can help encourage victims to come forward and creates a more open relationship with the public. We would encourage forces to replicate this approach to cases dealt with through the misconduct regulations. In all cases, communications should take into account the views, experiences and trauma of vulnerable people, taking care not to increase their exposure to harm.

## **Ease of access to force information**

It isn't always easy to find out about cases of police corruption, including abuse of position for a sexual purpose. We conducted a review of such information across all 43 force websites. We also looked to see how easy it was to access the information.

In 11 forces, we found some form of link on the front page of their website to the findings of cases where officers have been dismissed. To find these, though, it helped to have some understanding of police terminology, such as 'misconduct hearings', 'professional standards' or 'public hearings'. When we used language the public may be more familiar with, such as 'complaints', 'bad behaviour', 'police behaviour' and 'police inappropriate behaviour', it was very difficult to find the information.

When we searched for the term 'misconduct', there were two forces where we couldn't find any information at all. When we accessed the relevant pages of the other 41 forces, the results were disappointing. Twenty contained no current information or the information used terminology that the public wouldn't easily understand. In 19 forces, there were either no results or only very recent ones. Some forces appeared to remove information after a short period of time about officers they have sacked. Generally, we found this to be after 28 days, which is the minimum time required by legislation. On a more positive note, some forces had information that was easy to access and understand. In some forces, we found the details of cases going back as far as 2013.

We also assessed whether there was a way for concerns to be reported to the police via their websites, or whether the websites provided easily accessible links to information on the abuse of vulnerable people or police corruption. We found that eight forces had some form of link to this behaviour and advice on how to provide information. However, no force website provided information on other forms of police corruption or how to report concerns.

# Appendix 1: Methodology

In 2018/19, we inspected all 43 police forces in England and Wales on their legitimacy, as part of our PEEL (police effectiveness, efficiency and legitimacy) risk-based inspection programme.

We asked how well a force makes sure that its workforce behaves ethically and lawfully. To do this, we assessed what progress forces had made against [our 2016 recommendations](#). These included how effectively the force addresses the problem of its staff and officers sexually abusing vulnerable people and how effectively the force vets its workforce. We asked all forces to send us their plans designed to address the recommendations. We had also [reviewed those plans in 2017](#) and given forces feedback about their progress. We said that we would be inspecting this area in the future.

For our 2018/19 inspection we:

- reviewed 60 corruption intelligence files; these included cases of corruption where officers and staff had sexually abused vulnerable people;
- interrogated vetting systems to assess how well forces vet their staff;
- interviewed the vetting manager;
- collected force data;
- reviewed force policies and strategic threat assessments;
- interviewed the heads of professional standards and the counter-corruption unit and held focus groups with their staff; and
- spoke to operational and non-operational officers and staff to assess their understanding of abuse of position for a sexual purpose.

We also spoke with representatives from many partner agencies to discuss the abuse of position for a sexual purpose of vulnerable people by police officers and staff. This group was invaluable to us in challenging and shaping our methodology and inspection findings.

We spoke with vulnerable people who had been victims of sexual abuse by police officers and staff. Their contributions have informed our findings and allowed us to convey their experiences in their own words.

The guiding standard for this inspection work was the College of Policing's authorised professional practice for police forces in England and Wales. This contains guidance on:

- how to prevent corruption;
- how to gather intelligence and analyse it;
- how to carry out investigations; and
- how to engage with communities at times of high profile cases.

## Appendix 2: About the data

The IOPC provided us with data for the number of completed referrals received. The IOPC apply case factors to help identify the nature of each case. Under the case factor title 'Corruption', there is a sub-factor titled 'abuse of position for sexual gains'. This includes examples of improper emotional relationships, such as:

- An officer/member of police staff engages in sexual intercourse while on duty with a vulnerable person.
- An officer/member of police staff comes into contact with a person through an investigation. While off duty, they make inappropriate contact with the person, texting, calling and visiting at home where they engage in sexual acts.

Case factors are applied manually by operational staff to help identify the nature of the case. This means they rely on individual discretion and, as a result, shouldn't be seen as providing definitive data. Also, data is taken from a live system and case factors can be added at any time; this means figures may differ from any published figures.

Data on referrals provided by the IOPC include referrals from police forces and other organisations, including the Home Office, [police and crime commissioners](#) and the National Crime Agency.

# Appendix 3: Vetting

## A brief history of police vetting

National standards on vetting for the police have developed considerably over the past 15 years.

Before 2006, police forces made limited checks on new recruits, but the checks weren't standardised across forces. The first national policy was introduced in 2004. By 2006, all forces had agreed to vet new recruits in line with this policy. This proved to be difficult for the service. As well as new recruits, they also had to vet tens of thousands of existing staff to this higher standard.

In 2017, the statutory [Vetting Code of Practice](#) was presented before Parliament. The College of Policing introduced [authorised professional practice for vetting](#) at the same time. These were developed so that the minimum national standards on vetting were applied consistently across policing.

## Different vetting levels

Forces need to vet people to different levels depending on their role. There are many different levels. We have described some of the most commonly used here.

Before joining the service, all prospective officers and staff undergo initial recruit vetting (RV).

Certain roles lead to exposure to more sensitive information. Examples are those that involve investigations into serious and major crimes or regular contact with vulnerable people. These roles are subject to a higher form of vetting known as management vetting (MV).

There are also a further series of vetting levels collectively known as non-police personnel vetting (NPPV), for people in other agencies who work with police services.

## Re-vetting

Vetting checks can only ever be a snapshot in time. People's circumstances change in ways that can affect their suitability to work in or alongside a police force: for example, if someone were to become involved in criminality or experience a breakdown in their personal relationship, marriage or civil partnership. Therefore, the vetting of all staff should be current.

Information checked during vetting can change over time and therefore forces need to periodically re-vet staff. The Vetting Code specifies time periods when this should be done. For people vetted to RV status, re-vetting is required every ten years. It is required every seven years for MV status. There are similar periods for the different levels of NPPV. The sensitive nature of police roles, and the vulnerability of the people they meet, requires staff to be vetted. It is not acceptable for vetting renewals to be ignored.

## **Previous inspections**

We inspected forces on their vetting as part of our 2016 PEEL legitimacy inspection. We found that all forces vetted new recruits for police officer, staff, volunteer and contractor roles to the national standard. But we were concerned to find that almost half of forces had yet to vet those staff employed before 2006. By 2016, even if a force chose not to vet these people initially, they should have been vetted by this date.

Due to our concerns, we gave the service a national cause for concern. This recommended that all forces had in place achievable plans to fully implement the national vetting standards and to vet all staff by December 2018.

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