

3 December 2019

The Rt Honourable Priti Patel MP  
Home Secretary  
2 Marsham Street  
London SW1P 4DF

Dear Home Secretary

**RESPONSE TO 'PEEL SPOTLIGHT REPORT SHINING A LIGHT ON BETRAYAL' PUBLISHED ON 27TH SEPTEMBER 2019**

Firstly I want to say how supportive I am of the Inspectorate's continued focus on the abuse of position for a sexual purpose as, although these types of incidents are small in number, they go against the very heart of British policing which is about protecting people from harm. In particular protecting the most vulnerable from harm is the first priority in my Police and Crime Plan so ensuring this type of corruption is effectively prevented, discovered and dealt with is especially relevant to me. I also know that this behaviour is wholly unacceptable to the Constabulary and, as stated in the report, its 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. This is embedded in the new values the Constabulary launched a year ago of caring, courageous, learning and inclusive.

The timing of this report and its recommendations are also welcomed as the rapid growth of policing across the country, through Operation Uplift, will mean there is a greater chance of this type of abuse so ensuring the processes are in place to effectively tackle this problem are even more important.

The recommendations applicable for the Chief Constable are noted as:

- 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.
- 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.
- 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.

In response to the recommendations I can confirm that, in the spirit of continuous improvement, the force had already identified a need for change following a peer review of the vetting function. The recommendations from that review gave rise to a formal business case, that was approved through the senior governance structure, that recommended the restructure and expansion of the vetting team. This enhanced structure will help ensure compliance with all elements of the Code of Practice and Authorised Professional Practice. The Constabulary is in the process of ensuring that all personnel are vetted and it is acknowledged the designated list of posts and vetting levels requires review in order to ensure that the vetting has been done to an appropriate level. This piece of work is being implemented and will have oversight through the most senior management forums.

The next recommendation covers a number of separate points so I will respond to each of these below.

I can confirm that the Counter Corruption Unit (CCU) already records intelligence using the ACCAG (ACPO Counter Corruption Advisory Group) categories and sub-categories.

The annual counter-corruption strategic threat assessment has been produced in accordance with the structure of the proposed regional template supplied by the National Crime Agency. This document was signed off in October 2019 and the next step is for the Constabulary to develop its Control Strategy based on this. The threat assessment and control strategy will be presented to the Constabulary's Standards and Confidence Board in December 2019 for adoption for 2019/20.

There are established links between the CCU and key teams/agencies that support vulnerable people: these include the Lighthouse victim and witness care service, specialist victim support services for victims of domestic and sexual abuse as well as Knightstone Housing Association. Through these links guidance is provided to staff making them aware of the signs and signals of the abuse of position for a sexual purpose and how to report concerns; regular contact and visits are made to ensure that new staff are educated. In 2018 the Constabulary implemented an external anonymous reporting mechanism accessed via the website specifically highlighting what amounts to an abuse of position for a sexual purpose and requesting information and reporting.

Although the Constabulary is able to monitor usage of its ICT equipment it will continue to enhance its local capability while the national solution is progressed. A local project has been commissioned to examine what other products may enhance this capability.

The Constabulary acknowledges the need to review the use of encrypted apps on police ICT systems and this forms part of the broader plan to improve the proactivity of counter corruption.

The Constabulary has the ambition to be more proactive and effective in how it tackles corruption including abuse of position for sexual purpose. The Professional Standards Department recognises the need for growth, specifically within the intelligence and investigative structures in the CCU and this recommendation provides further supporting evidence for the business case that will enable this expansion.

There were also two recommendations at a national level – these recommendations are welcomed by the Constabulary and, when implemented will help bring consistency and efficiency across all forces.

In conclusion, I acknowledge the very important issue this report addresses and the need to be more proactive in dealing with this; I am assured that the Constabulary are taking steps to begin to address any gaps highlighted by the recommendations.

This response is published on the OPCC website (<https://www.avonandsomerset-pcc.gov.uk/Openness/Audits-and-Inspections/HMICFRS.aspx>).

Regards

A handwritten signature in brown ink that reads "Sue Mountstevens".

SUE MOUNTSTEVENS  
Police and Crime Commissioner  
for Avon & Somerset

cc. Wendy Williams, HMI  
Chief Constable Andy Marsh, Avon & Somerset Constabulary