

‘A report into the effectiveness of integrity arrangements in Avon and Somerset Constabulary’ published by HMICFRS on 29 October 2025
Avon & Somerset PCC response dated 24 December 2025

As your Police and Crime Commissioner, one of my core responsibilities is to ensure that the police operate with the highest standards of integrity, transparency, and accountability. Public confidence in policing depends on these principles being upheld at all times.

This inspection provides valuable independent scrutiny. As well as highlighting good practice such as the *“Constabulary uses a variety of methods to reinforce organisational learning and the standards of professional behaviour”*; it also makes clear where there Constabulary needs to improve.

The Constabulary has already started to address some of the issues identified during the inspection. I will work closely with the Chief Constable and her Deputy to ensure that every Area of Improvement is addressed promptly and effectively. Through my ongoing governance, I will continue to monitor progress and hold the force to account, so that the Constabulary delivers the highest standards of professionalism and integrity that the public rightly expects.

It should be noted that I have a legal duty to respond to inspection reports within eight weeks of their publication. However, the Constabulary have longer to address Areas for Improvement. There was one recommendation for Chief Constables discussed below.

Area for improvement 1

The constabulary needs to improve how it identifies, explores and records adverse information in vetting decisions

The constabulary should make sure that during the vetting process:

- it requires applicants to declare information about partners, including partners they aren't living with;
- it completes the appropriate checks when an applicant declares a partner;
- where appropriate, it interviews the applicant to clarify details provided in the vetting application, and explores adverse information to help assess risk; and
- when adverse information has been identified, all vetting decisions (refusals, clearances and appeals) are supported with a sufficiently detailed recorded rationale.

We identified each of these either as an area for improvement or recommendation in our 2022 national report 'An inspection of vetting, misconduct, and misogyny in the police service'. Avon and Somerset Constabulary has still not implemented them.

Response

The Constabulary have already put in place new vetting forms which require declaration of partners and checks are now conducted on these partners.

Vetting interviews are already conducted on a regular basis and this is checked through the Quality Assurance (QA) process. This may be an issue of recording as there is not a specific field within the vetting IT system to say that an interview has taken place.

The Constabulary accept there is still more to do on the quality of rationale. They are arranging training for their vetting team from an external provider with expertise in this.

Area for improvement 2

The constabulary needs to improve how it assures the quality of vetting decisions

The constabulary should make sure that it has an effective quality assurance process to review vetting decisions, including routine dip sampling of cases that revealed adverse information.

We recommended that forces have an effective quality assurance process for vetting decisions in our 2022 national report 'An inspection of vetting, misconduct, and misogyny in the police service'. Avon and Somerset Constabulary has still not implemented this recommendation.

Response

The Constabulary had been conducting regular QA sessions prior to the inspection but these had been paused. The QA assurance process has been started again and now happens consistently on a quarterly basis.

The Constabulary recognise that their Senior Vetting Advisors (SVAs) do not currently have capacity to dip sample the work of researchers before decisions are

made. The Constabulary are exploring the option of increasing the number of SVAs that they have.

Area for improvement 3

The constabulary needs to improve its complaint and conduct decision-making processes.

The constabulary needs to make sure that police personnel of appropriate seniority make decisions on how to handle complaints.

It has a complaint handling map that identifies key stages of the process. The map is colour-coded, showing who is responsible for each stage. But the document allocates decision-making to police personnel who aren't senior enough.

Professional standards department assessors make the initial decision on how a complaint should be handled. They decide whether a case is handled inside or outside Schedule 3 of the Police Reform Act 2002, whether the matter requires referral to the Independent Office for Police Conduct and whether, if recorded under Schedule 3, it should be handled otherwise than by investigation.

This is contrary to the requirements of the Police Reform Act 2002, the Police (Complaints and Misconduct) Regulations 2020, Independent Office for Police Conduct statutory guidance, and the constabulary's scheme of delegation.

A delegated appropriate authority of at least the rank of inspector, or police staff equivalent, must make all decisions to record a complaint under Schedule 3, and any subsequent handling decision. The assessors aren't of this seniority.

Response

The Constabulary are recruiting an Inspector into a new role that will QA and have oversight of the handling decisions in order to address this AFI.

Area for improvement 4

The constabulary needs to improve the way it handles and manages complaints and allegations of misconduct

This is in respect of the constabulary's:

- use of investigation plans;
- supervisory oversight of investigations; and
- retention of documents.

At the time of our inspection, the constabulary had recently introduced an investigation plan template to provide consistency. It trained professional standards department (PSD) investigators in its use in January 2025.

But the constabulary doesn't complete investigation plans consistently. In our review, the seven conduct cases that required an investigation plan had one. But none of the six public complaint investigations that required one had a plan.

We found that PSD supervisors weren't regularly reviewing complaint and conduct investigations. Of the 13 investigations we reviewed, we saw supervisory oversight in only 3 conduct cases, and in none of the complaint cases.

We were told that the constabulary didn't always record supervisory oversight on its complaint and conduct database Centurion, and that supervisors recorded direction and guidance for investigators on a separate spreadsheet. PSD personnel told us that the two PSD investigation teams had different working practices. One supervisor reviews cases every two weeks, the other every four weeks.

In our 2022 national report 'An inspection of vetting, misconduct, and misogyny in the police service', we recommended that forces produce and follow an investigation plan endorsed by a supervisor. Avon and Somerset Constabulary has still not implemented this recommendation.

The PSD's retention of documents is also inconsistent. The constabulary has produced no guidance on the use of Centurion. Investigators are using it, and other shared folders, as they see fit. This makes it difficult for colleagues, supervisors or those auditing cases to find relevant material.

Response

The Constabulary have been using investigation plan templates since February 2025. However, they need to ensure these are consistently recorded on the PSD system, along with the supervisor reviews. This will enable performance monitoring and oversight by the Senior Leadership Team.

In terms of record retention, the Constabulary have moved to storing these records on the central PSD system rather than separate drives.

Area for improvement 5

The constabulary needs to improve its understanding of potential disproportionality in the handling, investigation and resolution of complaints and conduct matters

Avon and Somerset Constabulary's decision-making in professional standards department (PSD) complaint and conduct investigations is consistent and fair. In our case file review, we saw no evidence of disproportionality.

A small team of appropriate authorities makes PSD decisions. They discuss cases to try to achieve consistency. But there is no formal quality assurance process.

An external scrutiny panel led by the office of the police and crime commissioner oversees PSD investigations. And the PSD provides data to the confidence and legitimacy board, which oversees consistency and fairness in its decision-making.

However, the PSD doesn't carry out any formal, detailed analysis to establish if there is any disproportionality across the nine protected characteristics in its investigations and decision-making.

To fully understand potential disproportionality in its PSD decision-making and the reasons for it, the constabulary should carry out detailed analysis across the nine protected characteristics.

Response

The Constabulary have developed an app in their data visualisation tool Qlik. This app shows the disproportionality of various aspects of the PSD process. Its use needs to be embedded in the oversight of the SLT.

However, there will remain challenges in the collection of information about people's protected characteristics. The Constabulary will look at how other police forces are doing this.

Area for improvement 6

The constabulary needs to improve how it monitors the use of its IT systems

The constabulary should make sure that:

- it can fully monitor all its computer systems, including mobile data, to proactively identify data breaches, protect the constabulary's data and identify computer misuse;
- it has enough capacity to proactively monitor the use of all its computer systems, including mobile data, to protect the constabulary's data and to identify misconduct, data breaches and computer misuse; and
- the counter-corruption unit (CCU) and IT department consult regularly to make sure the CCU can effectively monitor, audit and investigate potential misuse of any IT systems the constabulary is developing or procuring.

The CCU can monitor most of its IT systems across mobile and desktop devices. But the constabulary has identified difficulties in monitoring some of its IT systems. It hasn't yet added this to its risk register.

The CCU proactively monitors some activity on mobile and desktop devices. This is supported by an artificial intelligence profiling tool in the constabulary's IT monitoring software.

But the CCU's ability to extend this proactive activity is limited by:

- staffing levels in the CCU;
- the allocation of intelligence developments; and
- the allocation of reactive investigations.

The CCU isn't sufficiently involved at an early stage in the procurement of new software and IT systems. This means that the CCU can't make sure it is able to effectively monitor, audit and investigate potential misuse of any IT systems the constabulary is developing or procuring.

These are areas for improvement we identified in our report 'Police effectiveness, efficiency and legitimacy (PEEL) 2018/19: An inspection of Avon and Somerset Constabulary'. They relate to recommendations in our 2022 national report 'An inspection of vetting, misconduct, and misogyny in the police service'. We are disappointed to see that Avon and Somerset Constabulary has still not implemented these recommendations.

Response

A new proactive Detective Inspector (DI) is being recruited into the CCU and they will have responsibility for addressing the gaps highlighted in this AFI and AFI 7.

The DI will establish a structure for regular meetings between the CCU and the IT department to discuss the monitoring of systems and procurement of new systems so that the CCU can effectively monitor and audit them.

Area for improvement 7

The constabulary needs to improve how it collects, assesses and develops counter-corruption intelligence

The constabulary should make sure that:

- its counter-corruption unit (CCU) actively looks for corruption-related intelligence as a matter of routine;
- it produces an effective counter-corruption strategic threat assessment (STA), associated control strategy and implementation plan with named police personnel given responsibility for actions, and uses them to manage corruption threats effectively;
- its people intelligence meeting supports the regular and continuing exchange of corruption-related intelligence so that the constabulary identifies police officers and police staff who may pose a corruption threat; and
- it produces and follows an investigation plan, endorsed by a supervisor, for all counter-corruption intelligence developments and investigations, and it checks all reasonable lines of enquiry have been concluded before finalising the case.

Avon and Somerset Constabulary proactively looks for corruption-related intelligence. But the constabulary told us it couldn't do more. This is due to the gaps in its IT monitoring capabilities and a lack of capacity in the CCU. It also stopped random drug testing during the pandemic.

The constabulary has produced a counter-corruption STA. It lists the corruption risks it faces, including some emerging risks. But the STA isn't clear enough about what risks the CCU has assessed as the highest priority. The CCU could improve the STA by identifying key locations for corrupt activity and profiling corruptors.

The constabulary hasn't completed an updated control strategy for its most recent STA. And it isn't using the STA and control strategy effectively to address its corruption threats. For example, the constabulary wasn't able to show us an implementation plan. We found the CCU wasn't carrying out some important actions it had identified in its control strategy.

The constabulary doesn't have an effective people intelligence meeting to identify and exchange information about police personnel who may pose a corruption risk. The constabulary used to hold a 'people meeting' every month. But it found these meetings ineffective and stopped them in May 2024 due to a change in leadership.

We found that the CCU used a variety of techniques to develop corruption-related intelligence. But the constabulary had missed opportunities to develop intelligence

and mitigate corruption risks in 14 cases. This is a higher proportion of cases than we see in most other forces. The constabulary could have avoided this with better use of its investigation template and more effective supervisory oversight of the cases.

This is an area for improvement we identified in our report 'Police effectiveness, efficiency and legitimacy (PEEL) 2018/19: An inspection of Avon and Somerset Constabulary'. We also made a recommendation about the use of the STA, control strategy and implementation plan in our 2022 national report 'An inspection of vetting, misconduct, and misogyny in the police service'. We are disappointed that Avon and Somerset Constabulary has still not implemented this recommendation.

Response

As well as the new DI (mentioned above), the Constabulary are also recruiting two Detective Constables to join the CCU which will increase the team's capacity and help address this AFI.

A revised Strategic Threat Assessment has just been completed and the new DI will develop a control strategy and implementation plan.

The people meeting referred to has been reestablished and will meet on a monthly basis going forward.

Area for improvement 8

The constabulary needs to improve how it manages business interests

The constabulary should make sure that it strengthens its business interest monitoring procedures so that:

- corruption-related intelligence informs every decision;
- it proactively monitors compliance where it refuses an application or there are conditions attached to the approval; and
- it carries out regular reviews of each approval.

The constabulary has a business interests policy, but its processes to manage business interests aren't effective. The counter-corruption unit doesn't proactively monitor compliance with any conditions imposed or refusal decisions.

The professional standards department advises applicants who have been granted approval for a business interest that they must re-apply for approval after 12 months. But at the time of our inspection, the constabulary had more than 1,200 business interest renewal applications waiting for review.

It can't say with any certainty how many of its officers and staff have active business interests and how many of these should no longer be approved. This is a significant corruption risk for the constabulary.

This relates to a recommendation in our 2022 national report 'An inspection of vetting, misconduct, and misogyny in the police service'. Avon and Somerset Constabulary has still not implemented this recommendation.

Response

The Constabulary have already reduced the backlog of Business Interest reviews to 400 (from the 1,200 cited above).

They are rewriting their Business Interest procedural guidance and are using elements of automation to improve the efficiency of the process.

The increase in the capacity in the CCU will also enable CCU to monitor relevant Business Interests (those with conditions) and a process is being designed to enable this to happen.

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