

**COMMISSIONER CAROLINE HENRY** 

## Response to HMICFRS report on the effectiveness of vetting and counter corruption arrangements in Nottinghamshire Police, November 2022

## 1. Police & Crime Commissioner comments:

- **1.1.** In March 2022, His Majesty's Inspectorate of Constabulary and Fire & Rescue Service (HMICFRS) conducted an independent inspection to examine the effectiveness the of Nottinghamshire Police response to vetting and counter-corruption. I welcome the findings of this inspection which were published on 17<sup>th</sup> November 2022.
- 1.2. Having read HMICFRS's national report on vetting, misconduct, and misogyny in policing, I was pleased to note that Nottinghamshire Police's vetting, and counter corruption work was rated as 'good' by the Inspectorate and that this positively reinforces the excellent work of the Force's Professional Standards Department in robustly rooting out corruption and serious misconduct.
- 1.3. Whilst Nottinghamshire Police received a positive assessment, I fully acknowledge and support the recommendations of the national report and I am committed to ensuring that we continue to raise general vetting standards for police officers and staff. Through my accountability role, I will do all I can to support the Force's adoption and implementation of the report's recommendations.
- 1.4. I am aware that Nottinghamshire Police are proactively examining the recommendations, which provides early assurance that we are committed to driving ongoing improvement. I believe that demonstrating robust vetting standards and effective handling of misconduct is critical to ensuring trust and confidence in the key relationship that policing holds with the public: that of policing by consent. Our public, communities and individual victims of crime must be able to have confidence in the response and support that the police can provide to them, and I will be working with Nottinghamshire Police to monitor how they are gripping this report's recommendations and putting them into practice.

## 2. Findings/Next Steps

2.1. The local inspection report highlighted one specific area for improvement relating to vetting, which was also reflected in the national report on vetting, misconduct and misogyny. This concerned the analysis of vetting data to identify, understand and respond to any evidence of disproportionality. Whilst the Force collect data relating to vetting decision for applicants with protected characteristics, this is not routinely analysed and reviewed.

- 2.2. The Force recognise this as an area for improvement and, in my role as Commissioner, I will monitor the progress made against this recommendation via my Accountability Board and broader oversight and scrutiny arrangements.
- 2.3. Of the 43 recommendations contained within the national inspection report, 28 were the primary responsibility of Chief Constables. Of these, 24 recommendations have been confirmed as existing practice within Nottinghamshire. This included but was not limited to the following recommendations:
  - Where adverse information is identified about an applicant during the vetting process, the vetting unit counter corruption unit, professional standards department and HR team work together to create and implement effective risk mitigation strategies where there is robust oversight.
  - Vetting decisions are supported with sufficiently detailed written rationale that considers identified risks factors. This is supported by a quality assurance process to review vetting decisions.
  - The police national database (PND) is used as a tool for revealing any unreported adverse information about officers and staff. This research is conducted on every person within a vetting file.
  - The professional standards departments attach a prejudicial and improper behaviour flag on the local case management system.
  - For intelligence around potential abuse of position for a sexual purpose (APSP) there
    is a risk assessment process, with action taken to minimise any risk identified. There is
    also a APSP review group that meets to discuss opportunities to develop this area of
    work.
- 2.4. The OPCC will continue assess Nottinghamshire Police performance in relation to the outstanding recommendations relevant to Force. The office will also monitor progress in relation to the recommendations directed to the College of Policing and NPCC Leads, so that the Force can be prepared to implement any revised policies and guidance.

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