

JOINT INDEPENDENT AUDIT COMMITTEE
July 2023

SUBJECT	External Audit and Super-Complaints Reports Implementation Progress
REPORT BY	DCC Steve Cooper
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SUMMARY AND PURPOSE OF REPORT	
To consider the progress made with the implementation of the recommendations from external audit reports.	
RECOMMENDATION	<i>That the progress update be noted.</i>

A. SUPPORTING INFORMATION

This report summarises the progress on the implementation of audit recommendations as of July 2023. An analysis of progress on recommendations is detailed in Appendix A. Audits that have been reported as complete to the previous committee are not included.

B. FINANCIAL CONSIDERATIONS

There are no direct financial implications arising from this report.

C. LEGAL AND HUMAN RIGHTS CONSIDERATIONS

The provision of internal audit services is one of the means by which the Police and Crime Commissioner discharges their responsibilities to secure the maintenance of an efficient and effective police force under section 1 (6)(b) of the Police Reform and Social Responsibility 5 2 Act 2011, and the Chief Finance Officer meets her responsibilities under section 151 of the Local Government Act 1972, section 73 of the Local Government Act 1985 and section 112 of the Local Government Finance Act 1988 for ensuring the proper administration of the Commissioner’s financial affairs.

D. PERSONNEL, EQUAL OPPORTUNITIES AND DIVERSITY ISSUES

(including any impact or issues relating to Children and Young People)

None.

E. REVIEW ARRANGEMENTS

The Committee are advised of progress in relation to all External Audit Reports and Super-complaints at each meeting.

F. RISK MANAGEMENT

Risks are detailed as appropriate within appendices to this report.

G. PUBLIC ACCESS TO INFORMATION

Information in this report along with any supporting material is subject to the Freedom of Information Act 2000 and other legislation.

Appendix A – External Inspections – Level 2 Recommendations

Appendix B – External Inspections – Level 3 Recommendations

Appendix C – Super-complaints

HMICFRS INSPECTIONS LEVEL 2 CURRENT OVERVIEW

HMICFRS have introduced a new process which divides Recommendations and Area's for Improvement (AFI's) into 4 categories, 1, 2, 3 and 4.

The categorisation is explained below –

1. No action required.
2. Forces are now able to close records when they have completed the work but needs to be accompanied with a letter from the Chief Constable, or delegated Head of Department.
3. Forces complete the work and accompany a letter from the Chief Constable, HMICFRS will come into force to follow-up and ensure action is appropriate.
4. Forces complete the work. HMICFRS will come into force to ensure the action is appropriate.

Recommendations		
Category	Number Outstanding	Number to be Closed Down
1	0	
2	75	61
3	33	33 Updates received, HMICFS to reality check before agreeing closure
4	0	

The force is currently working through the recommendations with a view to closing them during the next quarter.

Date	Title	Recommendation	Total Number Outstanding	Total Number Closed
Apr 2019	<p>Stalking and harassment: An inspection of Sussex Police commissioned by the police and crime commissioner, and an update on national recommendations in HMICFRS 2017 report</p> <p><u>STATUS</u> – Evidence refreshed, awaiting closure.</p>			
		<p>Within six months chief constables should ensure that forces record stalking or harassment crimes if appropriate when victims report breaches of orders.</p> <p>Within six months the National Police Chiefs Council (NPCC) lead and the CPS lead should consider whether they can do more to inform police officers and lawyers of the importance of treating breaches of orders as evidence of a wider pattern of offending, and when and in what circumstances officers and lawyers should treat this as further evidence of stalking or harassment.</p> <p>Within six months chief constables should ensure that officers are aware of the importance of treating breaches of orders, where appropriate, as part of a wider pattern of offending, and ensure that force policy and guidance help officers to do this.</p>	1	0

Jul 2019	The poor relation: The police and Crown Prosecution Service's response to crimes against older people <u>STATUS</u> – Evidence refreshed, awaiting closure.			
		Within six months, chief constables should make sure that victim needs assessments are always completed.	2	2
		Within three months, chief constables should conduct analysis of the current and future demand for adult safeguarding, including the gap in knowledge that may exist from those cases where referrals aren't made because of errors or omissions. This analysis should be incorporated into force management statements (FMSs).		
Sept 2019	Shining a light on betrayal: Abuse of position for a sexual purpose <u>STATUS</u> – Evidence refreshed, awaiting closure.			
		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.	2	1
		By April 2020, all forces that haven't yet done so should: <ul style="list-style-type: none"> • 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. 		

		<p>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.</p> <p>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.</p>		
Feb 2020	<p>A joint thematic inspection of Integrated Offender Management</p> <p><u>STATUS</u> – Evidence refreshed, awaiting closure.</p>			
		<p>Ensure that service users are kept informed, as much as possible, about the benefits of inclusion in IOM, the support available and the monitoring and information-sharing ramifications of IOM supervision.</p>	3	1
		<p>Analyse training needs and ensure that all staff receive sufficient training to enable them to fulfil their duties. Training in public protection, safeguarding children and working with vulnerable adults should be prioritised.</p>		
		<p>Improve the quality and accuracy of recording in IOM cases, in particular, the activity relating to public protection.</p>		
Jul 2020	<p>PEEL spotlight report: The Hard Yards Police to police collaboration</p> <p><u>STATUS</u> – Awaiting NPCC, College of Policing and Home Office methodology.</p>			
		<p>If forces haven't yet implemented an effective system to track the benefits of their collaborations, they should use the methodology created by the NPCC, the College of Policing and the Home Office.</p>	1	0

Jul 2020	Roads Policing: Not optional - An inspection of roads policing in England and Wales <u>STATUS</u> – Evidence refreshed, awaiting closure.			
		With immediate effect, chief constables should satisfy themselves that the resources allocated to policing the strategic road network within their force areas are sufficient. As part of that process, they should make sure that their force has effective partnership arrangements including appropriate intelligence sharing agreements with relevant highways agencies.	2	2
		With immediate effect, chief constables should make sure: <ul style="list-style-type: none"> • their force has enough analytical capability (including that provided by road safety partnerships) to identify risks and threats on the road network within their force area. • that information shared by partners relating to road safety is used effectively to reduce those risks and threats; and • There is evaluation of road safety initiatives to establish their effectiveness. 		
Dec 2020	Pre-charge bail and released under investigation: striking a balance <u>STATUS</u> – Evidence refreshed work ongoing.			
		Forces should record whether a suspect is on bail or RUI on the MG3 form when it is submitted to the CPS. This should be regularly checked and any changes in bail or RUI provided to the CPS. The CPS should work with the police to ensure this information is provided.	2	0

		Forces should develop processes and systems to clearly show whether suspects are on bail or RUI. This will help them to better understand the risk a suspect pose to victims and the wider community and will help to increase safeguarding.		
Feb 2021	An inspection of the effectiveness of the Regional Organised Crime Units			
	<u>STATUS</u> – Evidence refreshed, awaiting closure.			
		By February 2022, the chief constable with the lead for SOC in each region, with the chief officers of the affected forces, should ensure that a chief officer is appointed with responsibility for each ROCU, as far as practicable working autonomously of force responsibilities.	2	0
		By February 2022, chief officers responsible for SOC in each region, with the chief officers of the affected forces, should make sure that systems are in place for senior investigating officers (SIOs) and lead responsible officers (LROs) to work effectively together.		
Feb 2021	Disproportionate use of police powers - A spotlight on stop and search and the use of force			
	<u>STATUS</u> – Evidence refreshed, work ongoing.			
		With immediate effect, forces should ensure that all stop and search records include detail of the self-defined ethnicity of the subject. When this information is refused by the subject, the officer-defined ethnicity code should be recorded.	6	0
		By July 2021, forces should ensure they have effective external scrutiny processes in place in relation to the use of force. Forces should take account of feedback and update the scrutiny panel and the community on the action taken.		

		By July 2021, forces should ensure they have effective internal monitoring processes on the use of force, to help them to identify and understand disproportionate use, explain the reasons, and implement any necessary improvement action.		
		<p>By September 2021, forces should:</p> <ul style="list-style-type: none"> • ensure that officers record on body-worn video (when this is available) the entirety of all stop and search encounters, including traffic stops and use of force incidents. • have a structured process for regularly reviewing and monitoring internally a sufficient sample of body-worn video footage to identify and disseminate learning and hold officers to account when behaviour falls below acceptable standards; and • provide external scrutiny panel members with access to samples of body- worn video footage showing stop and search encounters and use of force incidents, taking account of the safeguards in the College of Policing's Authorised Professional Practice. 		
		By July 2021, forces should ensure that communication skills are reinforced as part of the programme of continuing professional development for officers and staff, and that supervisors are supported to routinely and frequently debrief officers on these skills using body-worn video footage.		
		By July 2022, forces should ensure that officers and staff have effective communication skills, in line with the National Policing Guidelines on Conflict Management. This should be in addition to existing training on conflict Management and de-escalation.		

Mar 2021	Getting the balance right? An inspection of how effectively the police deal with protests <u>STATUS</u> – Evidence refreshed, awaiting closure.			
		By 31 December 2021, chief constables should ensure that their forces have sufficiently robust governance arrangements in place to secure consistent, effective debrief processes for protest policing. Such arrangements should ensure that: <ul style="list-style-type: none"> • forces give adequate consideration to debriefing all protest-related policing operations; • the extent of any debrief is proportionate to the scale of the operation; a national post-event learning review form is prepared after every debrief; and • the form is signed off by a gold commander prior to submission to the National Police Co-ordination Centre. 	2	0
		By 31 December 2021, chief constables should make sure that their legal services teams subscribe to the College of Policing Knowledge Hub’s Association of Police Lawyers Group.		
Apr 2021	Policing the pandemic – The police response to the coronavirus pandemic during 2020 <u>STATUS</u> – Now business as usual.			
		Overall scale and impact of changes Within 6 months, forces must assess the sustainability of any temporary measures introduced during the pandemic that change the way they work. They must understand positive, negative and unintended consequences of the scale and impact of the changes before determining if any of these new ways of working should continue.	5	0

		<p>Custody records Forces must immediately make sure that they clearly and consistently record on custody records information about how/when/if detainees are informed of the temporary changes to how they can exercise their rights to legal advice and representation. The record must make clear how any consents are obtained about the way in which legal advice and representation are provided.</p>		
		<p>Test, track and trace Forces must immediately put in place a policy to make sure that they follow the guidance and self-isolation directions when members of the workforce come into contact with someone with coronavirus symptoms.</p>		
		<p>Legislation and guidance Forces must immediately make sure they can manage their responses to changes in coronavirus-related legislation. They must ensure frontline officers and staff are clear about the difference between legislation and guidance.</p>		
		<p>Managing registered sex offenders Forces must immediately make sure that officers understand and correctly implement the guidance for managing registered sex offenders during the pandemic.</p>		
Apr 2021	<p>Custody Services in a Covid-19 Environment <u>STATUS</u> – Now business as usual.</p>			
		<p>To help clarify the custody information that forces collect and use, we recommend that forces:</p> <ul style="list-style-type: none"> Track the numbers of detainees with, or suspected of having, COVID-19. 	1	1

		<ul style="list-style-type: none"> Record and monitor the length of time detainees remain in police custody, and any additional detention times due to waits for virtual remand hearings. Record and monitor the way in which detainees receive their legal rights, and how many receive them by virtual means rather than a solicitor attending in person and Record the use of bail and released under investigation, and assess any increases in pre-charge bail. 		
Jun 2021	Nottinghamshire Police – Review of Policing Domestic Abuse During the Pandemic <u>STATUS</u> – Now business as usual.			
		<ul style="list-style-type: none"> We recommend that if forces continue to adopt online contact methods in respect of victims of domestic abuse, they should immediately introduce an effective supervision and monitoring framework. The framework should assess the suitability of such contact methods, ensuring that victim needs are at the forefront of decisions around their use and appropriate onward action is taken in all cases. We recommend that forces immediately review their use of a telephone-based initial response to any domestic abuse incidents and crimes and ensure that it is in accordance with the strict parameters set out by the College of Policing. 	3	0

		<p>We recommend that forces immediately review their capacity to provide ongoing support and safeguarding to victims of domestic abuse whose case is awaiting trial at court. This should:</p> <ul style="list-style-type: none"> • ensure there are sufficient resources available to maintain contact with victims to keep them up to date with the progress of their case; and • enable the offer of access to specialist support services as well as opportunities to address concerns victims may have regarding continuing to support a prosecution through the delays. 		
		<p>We recommend that all forces immediately review their use of outcome 15, outcome 16 and evidence-led prosecutions. This is to ensure that:</p> <ul style="list-style-type: none"> • domestic abuse investigations guarantee all attempts to engage victims are explored, and that all possible lines of evidence are considered so that in all cases the best possible outcomes for victims are achieved. • there is regular and effective supervision of investigations that supports the above point to be achieved; and • the use of outcomes 15 and 16 is appropriate, and the reasons for using them, including auditable evidence of victim engagement, are clearly recorded. 		
Jul 2021	<p>A Joint Thematic Inspection of Police and Crown Prosecution Service’s Response to Rape</p> <p><u>STATUS</u> – Evidence refreshed, awaiting closure.</p>			
		<p>Immediately, police forces should ensure information on the protected characteristics of rape victims is accurately and consistently recorded.</p>	8	0

		Police forces and support services should work together at a local level to better understand each other's roles. A co-ordinated approach will help make sure that all available and bespoke wrap-around support is offered to the victim throughout every stage of the case. The input of victims and their experiences should play a central role in shaping the support offered.		
		Police forces should collect data to record the different stages when, and reasons why, a victim may withdraw support for a case. The Home Office should review the available outcome codes so that the data gathered can help target necessary remedial action and improve victim care.		
		Immediately, police forces and Crown Prosecution Service Areas should work together at a local level to prioritise action to improve the effectiveness of case strategies and action plans, with rigorous target and review dates and a clear escalation and performance management process. The National Police Chiefs Council lead for adult sexual offences and the Crown Prosecution Service lead should provide a national framework to help embed this activity.		

		<p>Police forces and the Crown Prosecution Service should work together at a local level to introduce appropriate ways to build a cohesive and seamless approach. This should improve relationships, communication and understanding of the roles of each organisation. As a minimum, the following should be included:</p> <ul style="list-style-type: none"> • considering early investigative advice in every case and recording reasons for not seeking it; • the investigator and the reviewing prosecutor including their direct telephone and email contact details in all written communication; • in cases referred to the Crown Prosecution Service, a face-to-face meeting (virtual or in person) between the investigator and prosecutor before deciding to take no further action; and • a clear escalation pathway available to both the police and the Crown Prosecution Service in cases where the parties don't agree with decisions, subject to regular reviews to check effectiveness, and local results. 		
		<p>The police and the Crown Prosecution Service, in consultation with commissioned and non-commissioned services and advocates, and victims, should review the current process for communicating to victims the fact that a decision to take no further action has been made. They should implement any changes needed so that these difficult messages are conveyed in a timely way that best suits the victims' needs.</p>		
		<p>Police forces should ensure investigators understand that victims are entitled to have police decisions not to charge reviewed under the Victims' Right to Review scheme and should periodically review levels of take-up.</p>		

		The College of Policing and NPCC lead for adult sexual offences should work together to review the current training on rape, including the Specialist Sexual Assault Investigators Development Programme (SSAIDP), to make sure that there is appropriate training available to build capability and expertise. This should promote continuous professional development and provide investigators with the right skills and knowledge to deal with reports of rape. Forces should then publish annual SSAIDP attendance figures, and information on their numbers of current qualified RASSO investigators.		
Aug 2021	A Review of Fraud – Time to Choose			
	<u>STATUS</u> – Evidence refreshed, awaiting closure.			
		By 30 September 2021, chief constables should make sure that their forces are following the guidance issued by the National Police Chiefs' Council Coordinator for Economic Crime about fraud-related calls for service.	2	0
		By 31 October 2021, chief constables should adopt the guidance issued in September 2019 by the National Police Chiefs' Council Coordinator for Economic Crime that was aimed at improving the information given to victims when reporting fraud.		

17 Sep 2021	Police Response to Violence against Women and Girls <u>STATUS</u> – Evidence refreshed, work ongoing.			
		<p>Immediate review of use of outcomes 15 and 16 in violence against women and girls’ offences -</p> <p>By December 2022, the NPCC VAWG National Delivery Lead should develop and disseminate to forces a process for consistent and robust monitoring of outcomes 15 and 16 violence against women and girls’ cases. This should require, as a minimum, inspector-level sign-off of these cases and that evidence on the rationale for these closure codes is recorded and auditable.</p>	3	0
		<p>All chief constables should immediately review and ensure that there are consistently high standards in their forces’ responses to violence against women and girls and should be supported in doing so by national standards and data.</p> <p>By March 2022, chief constables should establish and publish an action plan that specifies in detail what steps the force will take to improve and standardise its approach to responding to violence against women and girls’ offences, with the aim of ensuring policies, processes and practices are effective, actively monitored, and managed, and meeting national standards.</p> <p>This should include (but is not limited to) improving and standardising: the use of police powers to protect women, including arrest of perpetrators, use of pre-charge bail, the applications for orders (where appropriate) and processes for responding to breaches of non-molestation and other orders.</p> <ul style="list-style-type: none"> the use of the Domestic Violence Disclosure Scheme; the capability of generalist and specialist staff to respond to violence against women and girls’ offences effectively, including consistent understanding of newer offences (such as coercive control). 		

		<ul style="list-style-type: none"> the identification and management of high-harm violent offenders against women and girls (in partnership with other organisations). the identification and protection of the most at-risk victims of violence against women and girls' offences (in partnership with other organisations); and internal and public communications related to violence against women and girls to ensure that messages raise awareness of the risk and emphasise the seriousness of the issues 		
		<p>Structures and funding should be put in place to make sure victims receive tailored and consistent support</p> <p>By March 2022, all police forces should ensure information on the protected characteristics of victims is accurately and consistently recorded.</p>		
Nov 2021	<p>A joint thematic inspection of the criminal justice journey for individuals with mental health needs and disorders</p> <p><u>STATUS</u> – Evidence refreshed, awaiting closure.</p>			
		Assure themselves that risks, and vulnerabilities are properly identified during risk assessment processes, particularly for voluntary attendees. They must ensure that risks are appropriately managed, including referrals to Healthcare Partners, Liaison and Diversion and the use of appropriate adults.	4	0
		Review the availability, prevalence, and sophistication of mental health flagging, to enhance this where possible, and to consider what meaningful and usable data can be produced from this.		

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		Dip sample (outcome code) OC10 and OC12 cases to assess the standard and consistency of decision making and use this to determine any training or briefing requirements and the need for any ongoing oversight.		
		Ensure that all dedicated investigative staff receive training on vulnerability which includes inputs on responding to the needs of vulnerable suspects (as well as victims). This should be incorporated within detective training courses.		
May 2022	A joint thematic inspection of the police and Crown Prosecution Service's response to rape - Phase two: Post-charge			
	<u>STATUS</u> – Evidence refreshed, awaiting closure.			
		Immediately, forces should make sure that victims of rape are given the opportunity to make a victim personal statement (VPS) at the earliest possible time, with the option of updating this statement closer to the court trial date.	3	0
		Immediately, the police and the CPS should work collaboratively to ensure that bad character is considered in all rape cases and progressed wherever it is applicable.		
		Immediately, police and prosecutors should review and significantly improve communications with victims from the point of charge onwards.		

<p>July 2022</p>	<p>Twenty years on, is MAPPA achieving its objectives? A joint thematic inspection of Multi-Agency Public Protection Arrangements</p> <p><u>STATUS</u> – Evidence refreshed, awaiting closure.</p>			
		<p>Police forces should ensure that –</p> <p>Workloads for staff managing sexual offenders are reviewed against national expectations and, where found to be excessive, take steps for mitigation and communicate this to affected staff.</p>	<p>4</p>	<p>0</p>
		<p>Police forces should ensure that –</p> <p>All MAPPA nominals managed at Levels 2 and 3 are allocated a suitably trained police offender manager.</p>		
		<p>The Probation Service, police forces, and prisons should ensure that: There is a comprehensive training strategy for all staff involved in the MAPPA process that fully utilises existing training packages and makes sure they can enable staff in all roles to prepare for and present or contribute to a case in a multi-agency forum and understand how MAPPA fits with other multi-agency forums, such as Integrated Offender Management and Multi-Agency Risk Assessment Conferences (MARACs).</p>		
		<p>The Probation Service, police forces, and prisons should ensure that: Category 3 referrals are made to manage individuals who present a high risk of domestic abuse where formal multi-agency management and oversight through MAPPA would add value to the risk management plan.</p>		

Aug 2022	PEEL Spotlight - The police response to burglary, robbery and other acquisitive crime - Finding time for crime			
<u>STATUS</u> – Evidence refreshed, work ongoing.				
		<p>By March 2023, all forces should ensure SAC investigations are subject to effective supervision and direction. This should focus on:</p> <ul style="list-style-type: none"> • making sure supervisors have the capability and capacity to meaningfully supervise investigations. • making sure investigations meet the necessary standard and achieve suitable outcomes that consider the voice or opinion of victims. • applying investigative outcome codes appropriately; and complying with the Victims’ Code and recording evidence of compliance 	2	0
		<p>By March 2023, forces should make sure their crime scene management practices adhere to the authorised professional practice on managing investigations for SAC or provide a rationale for deviating from it. They should also include:</p> <ul style="list-style-type: none"> • giving victims timely and appropriate advice during their initial call; and • applying a risk assessment process such as THRIVE, clearly recording it, and flagging those re-victimised for further support. 		
Dec 2022	An inspection into how well the police and other agencies use digital forensics in their investigations			
<u>STATUS</u> – Evidence refreshed, awaiting closure.				
		<p>By December 2023, each force in England and Wales should develop a governance and oversight framework to better understand the local demand for digital forensic services.</p>	3	0

		By September 2023, the National Police Chiefs' Council and all forces within England and Wales need to include the management of digital forensic kiosks in their governance and oversight frameworks.		
		By November 2024, chief constables should integrate digital forensic services under their existing forensic science structure.		
Mar 2023	An Inspection of how well the police tackle serious youth violence			
	<u>STATUS</u> – Evidence refreshed, awaiting closure.			
		By 31 March 2024, chief constables should make sure their officers are trained in the use of Home Office crime outcome 22. The Home Office defines outcome 22 as when: “diversionary, educational or intervention activity, resulting from the crime report, has been undertaken and it is not in the public interest to take any further action”.	2	0
		By 31 March 2024, chief constables should make sure their forces, through data collection and analysis, understand the levels of racial disproportionality in serious youth violence in their force areas.		
Apr 2023	An Inspection of how well the Police and national Crime Agency Tackle the Online Sexual Abuse and Exploitation of children			
	<u>STATUS</u> – Evidence refreshed, awaiting closure.			
		By 31 October 2023, the National Police Chiefs' Council lead for child protection should work with chief constables and chief officers with responsibilities for regional organised crime units to introduce regional collaboration and oversight structures to support the Pursue board. This should: <ul style="list-style-type: none"> - improve the link between national and local leadership and the frontline response. 	11	0

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		<ul style="list-style-type: none"> - provide detailed, consistent scrutiny of performance; and - meet chief constables' obligations for tackling online child sexual abuse and exploitation, as set out in the Strategic Policing Requirement. 		
		<p>By 31 October 2023, chief constables, the director general of the National Crime Agency and chief officers with responsibilities for regional organised crime units should make sure they have effective data collection and performance management information. This is so they can understand the nature and scale of online child sexual abuse and exploitation in real time and its impact on resources, and so forces and the National Crime Agency can react quickly to provide adequate resources to meet demand.</p>		
		<p>By 30 April 2025, chief constables should make sure officers and staff dealing with online child sexual abuse and exploitation have completed the right training to carry out their roles.</p>		
		<p>By 31 July 2023, chief constables should satisfy themselves that they are correctly sharing information and making referrals to their statutory safeguarding partners in cases of online child sexual abuse and exploitation. This is to make sure they are fulfilling their statutory obligations, placing the protection of children at the centre of their approach, and agreeing joint plans to better protect children who are at risk.</p>		
		<p>By 31 October 2023, chief constables and police and crime commissioners should make sure their commissioned services for children, and the process for referring them for support or therapeutic services, are available for children affected by online sexual abuse and exploitation.</p>		

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		By 31 July 2023, chief constables and police and crime commissioners should review the advice they publish, and, if necessary, revise it, to make sure it is consistent with the National Crime Agency's ThinkUKnow (Child Exploitation and Online Protection) [[https://www.thinkuknow.co.uk/]] material.		
		By 31 October 2023, chief constables in England should satisfy themselves that their forces' work with schools is consistent with the national curriculum and National Crime Agency educational products on online child sexual abuse and exploitation. They should also make sure this work is targeted based on joint analysis with their safeguarding partners.		
		With immediate effect, chief constables should satisfy themselves that their crime allocation policies make sure online child sexual abuse and exploitation cases are allocated to those with the necessary skills and training to investigate them.		
		With immediate effect, chief constables should make sure their force meets any existing recommended timescales for activity targeting online child sexual abuse and exploitation and arrange their resources to meet those timescales. Then, six months after the new prioritisation tool is implemented, they should carry out a similar review.		
		By 31 October 2023, the National Police Chiefs' Council lead for child protection, chief officers with responsibilities for regional organised crime units and the director general of the National Crime Agency (NCA) should review the process for allocating online child sexual abuse and exploitation investigations, so they are investigated by the most appropriate resource. This should include a prompt way of returning cases to the NCA when forces establish that the case needs NCA capabilities to investigate it.		

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		By 31 October 2023, chief constables should work with their local criminal justice boards to review and, if necessary, amend the arrangements for applying for search warrants. This is to make sure the police can secure warrants quickly when children are at risk. This review should include the feasibility of remote communication.		
Apr 2023	Values and Culture in Fire and Rescue Services <u>STATUS</u> – Evidence refreshed, work ongoing.			
		By 1 September 2023, chief constables should make sure they are appropriately using their Common Law Police Disclosure powers in circumstances involving employees of fire and rescue services.	1	0

HMICFRS INSPECTIONS LEVEL 3 CURRENT OVERVIEW

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The categorisation is explained below –

1. No action required.
2. Forces are now able to close records when they have completed the work but needs to be accompanied with a letter from the Chief Constable, or delegated Head of Department.
3. Forces complete the work and accompany a letter from the Chief Constable, HMICFRS will come into force to follow-up and ensure action is appropriate.
4. Forces complete the work. HMICFRS will come into force to ensure the action is appropriate.

Recommendations		
Category	Number Outstanding	Number to be Closed Down
1	0	
2	75	61
3	33	33 Updates received, HMICFS to reality check before agreeing closure
4	0	

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Date	Title	Recommendation	Total Number Awaiting sign off by HMICFRS	Total Number Closed
Feb 2020	National Child Protection Inspections 2019 thematic report <u>STATUS</u> – Evidence updated, awaiting sign off by HMICFRS.			
		We recommend that chief constables should review performance management and quality assurance approaches to ensure that assessments of the nature and quality of decision making are routinely made. The purpose of this would be to reinforce the understanding that compliance with policy or process is only one part of effective practice.	2	0
		We recommend that chief constables take steps to reduce the unnecessary criminalisation of children. Such steps could include (but don't need to be limited to) considering fully a child's circumstances when making decisions; more effective use of legislation to discontinue prosecutions not in the public (or child's) interest; the development of more effective non-criminal justice pathways for vulnerable children who commit lower-level crimes.		

<p>Nov 2022</p>	<p>An inspection of vetting, misconduct, and misogyny in the police service</p> <p><u>STATUS</u> – Detailed submissions are given to the National Police Chief’s Council and HMICFRS on a monthly basis.</p>			
		<p>By 31 October 2023, the College of Policing should update its guidance on the minimum standard of pre-employment checks that forces must carry out before appointing an officer or member of staff. Every chief constable should make sure their force complies with the guidance. As a minimum, pre-employment checks should:</p> <ul style="list-style-type: none"> • obtain and verify previous employment history for at least the previous five years (including dates of employment, roles carried out and reason for leaving); and • verify the qualifications the applicant claims to have. 	<p>29</p>	<p>0</p>
		<p>By 30 April 2023, chief constables should establish and begin operation of a process to identify, within their vetting IT systems, vetting clearance records where:</p> <ul style="list-style-type: none"> • applicants have committed criminal offences; and/or • the record contains other types of concerning adverse information. 		
		<p>By 30 April 2023, chief constables should take steps to make sure that, when granting vetting clearance to applicants with concerning adverse information about them:</p> <ul style="list-style-type: none"> • vetting units, counter-corruption units, professional standards departments, and HR departments (working together where necessary) create and implement effective risk mitigation strategies; • these units have enough capacity and capability for this purpose; • responsibilities for implementing specific elements of the risk mitigation strategy are clearly defined; and • there is robust oversight. 		

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		<p>By 30 April 2023, chief constables should make sure that, when concerning adverse information has been identified during the vetting process, all vetting decisions (refusals, clearances and appeals) are supported with a sufficiently detailed written rationale that:</p> <ul style="list-style-type: none"> • follows the National Decision Model; • includes the identification of all relevant risks; and • takes full account of the relevant risk factors described in the Vetting Authorised Professional Practice. 		
		<p>By 31 October 2023, chief constables should introduce an effective quality assurance process to review vetting decisions, including routine dip sampling of:</p> <ul style="list-style-type: none"> • rejections; and • clearances where the vetting process revealed concerning adverse information. 		
		<p>By 30 April 2023, chief constables should make sure they comply with the Vetting Authorised Professional Practice by analysing vetting data to identify, understand and respond to any disproportionality.</p>		
		<p>By 30 April 2023, chief constables who have not already done so should establish and begin operation of a policy requiring that, at the conclusion of misconduct proceedings where an officer, special constable or member of staff has been issued with a written warning or a final written warning, or been reduced in rank, their vetting status is reviewed.</p>		
		<p>By 31 October 2023, chief constables who have not already done so should establish and begin operation of a process to:</p> <ul style="list-style-type: none"> • identify the required vetting level for all posts within the force, including designated posts requiring management vetting; and • determine the vetting status of all police officers and staff in designated posts. 		

		<p>As soon as possible after this, these chief constables should:</p> <ul style="list-style-type: none"> • make sure that all designated postholders are vetted to the enhanced (management vetting) level using all the minimum checks listed in the Vetting Authorised Professional Practice; and • give continued assurance that designated postholders always have the requisite level of vetting. 		
		<p>By 30 April 2023, chief constables should:</p> <ul style="list-style-type: none"> • make sure that all police officers and staff are made aware of the requirement to report any changes to their personal circumstances; • establish a process through which all parts of the organisation that need to know about reported changes, particularly the force vetting unit, are always made aware of them; and • make sure that where a change of circumstances creates additional risks, these are fully documented and assessed. If necessary, additional risks should lead to a review of the individual's vetting status. 		
		<p>By 31 December 2023, chief constables should make routine use of the Police National Database (PND) as a tool for revealing any unreported adverse information about officers and staff. To help this, the College of Policing should:</p> <ul style="list-style-type: none"> • working with the National Police Chiefs' Council lead for counter-corruption, change the Counter-Corruption (Intelligence) APP to include a requirement for the PND to be used in this way; and • change the PND Code of Practice (and any subsequent code of practice concerning the Law Enforcement Data System) to include a specific provision that allows for the PND to be used in this way. 		

		<p>By 30 April 2023, chief constables should make sure that there is a robust response to any criminal allegation made by one member of their force against another. This should include:</p> <ul style="list-style-type: none"> • consistent recording of allegations; • improved investigation standards; and • sufficient support for victims and compliance with the Code of Practice for Victims of Crime in England and Wales. 		
		<p>By 30 April 2023, chief constables should adopt the National Police Chiefs' Council sexual harassment policy.</p>		
		<p>By 31 October 2023, chief constables should make sure their professional standards departments attach a prejudicial and improper behaviour flag to all newly recorded relevant cases.</p>		
		<p>By 30 April 2023, chief constables should make sure their professional standards departments and counter-corruption units routinely carry out all reasonable wider inquiries when dealing with reports of prejudicial and improper behaviour. These inquiries should ordinarily include (but not be limited to) sampling the following, in relation to the officer under investigation:</p> <ul style="list-style-type: none"> • their use of IT systems; • incidents they attended, and incidents they are otherwise connected to; • their use of work mobile devices; • their body-worn video recordings; • radio location checks; and • misconduct history. 		
		<p>By 30 April 2023, chief constables should make sure their professional standards departments:</p> <ul style="list-style-type: none"> • produce and follow an investigation plan, endorsed by a supervisor, for all misconduct investigations; and • check all reasonable lines of inquiry in the investigation plan have been concluded before finalising the investigation. 		

		<p>By 30 April 2023, in the forces where we have not carried out fieldwork during this inspection, chief constables who have not already carried out a review of all allegations relating to prejudicial and improper behaviour, should do so. The review should be of cases from the last three years where the alleged perpetrator was a serving police officer or member of staff. The review should establish whether:</p> <ul style="list-style-type: none"> • victims and witnesses were properly supported; • all appropriate authority assessments, including assessments which didn't result in a complaint or misconduct investigation, were correct; • investigations were comprehensive; and • any necessary steps are taken to improve the quality of future investigations. These reviews will be subject to examination during our next round of inspections of professional standards departments. 		
		<p>With immediate effect, chief constables must make sure that forces use Regulation 13 of the Police Regulations 2003 for underperforming officers during their probationary period, rather than the Police (Performance) Regulations 2020.</p>		
		<p>By 30 April 2023, chief constables should make sure that:</p> <ul style="list-style-type: none"> • all intelligence concerning possible sexual misconduct by officers or staff (including abuse of position for a sexual purpose and internal sexual misconduct) is subject to a risk assessment process, with action taken to minimise any risk identified; and • rigorous additional oversight arrangements are in place to monitor the behaviour of officers subject to the risk assessment process, especially in cases assessed as high risk. 		

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		<p>By 31 March 2023, chief constables should make sure that counter-corruption units (CCUs) have established relationships with external bodies that support vulnerable people who may be at risk of abuse of position for a sexual purpose, such as sex-worker support services, drug and alcohol and mental health charities. This is to:</p> <ul style="list-style-type: none"> • encourage the disclosure by such bodies, to the force's CCU, of corruption-related intelligence relating to the sexual abuse of vulnerable people by police officers and staff; • help the staff from these bodies to understand the warning signs to look for; and • make sure they are made aware of how such information should be disclosed to the CCU. 		
		<p>By 30 April 2023, chief constables should make sure that their counter-corruption units actively seek corruption-related intelligence as a matter of routine.</p>		
		<p>By 31 March 2023, to protect the information contained within their systems and help them to identify potentially corrupt officers and staff, chief constables should make sure that:</p> <ul style="list-style-type: none"> • their force has the ability to monitor all use of its IT systems; and • the force uses this for counter-corruption purposes, to enhance its investigative and proactive intelligence gathering capabilities. 		
		<p>By 30 April 2023, chief constables should establish and begin operation of an improved system of mobile device management, with accurate record keeping concerning:</p> <ul style="list-style-type: none"> • the identity of the officer or staff member each device is allocated to; and • what each device has been used for. 		

		<p>By 30 April 2023, chief constables should:</p> <ul style="list-style-type: none"> • convene, and hold on a regular and continuing basis, people intelligence meetings; or • establish and begin operation of an alternative process to support the presentation and exchange of corruption-related intelligence, to identify officers and staff who may present a corruption risk. 		
		<p>By 30 April 2023, chief constables should make sure that all corruption-related intelligence is categorised in accordance with the National Police Chiefs' Council counter-corruption categories (and any revised version of these).</p>		
		<p>By 30 April 2023, chief constables should make sure they have a current counter-corruption strategic threat assessment, in accordance with the Counter-Corruption (Intelligence) Authorised Professional Practice.</p>		
		<p>By 30 April 2023, chief constables should make sure their counter-corruption units:</p> <ul style="list-style-type: none"> • produce and follow an investigation plan, endorsed by a supervisor, for all counter-corruption investigations; and • check all reasonable lines of inquiry in the investigation plan have been concluded before finalising the investigation. 		
		<p>By 30 April 2023, chief constables should strengthen their business interest monitoring procedures to make sure that:</p> <ul style="list-style-type: none"> • records are managed in accordance with policy and include cases where authorisation has been refused; • the force actively monitors compliance with conditions that are attached to the approval, or where the application is refused; • regular reviews of each approval are carried out; and • all supervisors are properly briefed about business interests held by members of their teams. 		

		<p>By 30 April 2023, chief constables should strengthen their notifiable association procedures to make sure that:</p> <ul style="list-style-type: none"> • they are compliant with the Counter-Corruption (Prevention) Authorised Professional Practice (APP) and that the obligation to disclose all associations listed in the APP is explicit; • there is an effective monitoring process to make sure that any conditions imposed are being complied with; and • all supervisors are correctly briefed on the notifiable associations declared by members of their teams. 		
		<p>By 30 April 2023, chief constables should make sure that a robust process is in place for completing annual integrity reviews for all officers and staff.</p>		
Mar 23	<p>An inspection of the East Midlands regional response to serious and organised crime</p> <p><u>STATUS</u> – Evidence updated, awaiting sign off by HMICFRS.</p>			
		<p>By 1 March 2024, the chief constable responsible for the EMSOU collaboration should revise the section 22 collaboration agreement. The revision should make clear that there is no real or perceived staffing quota and that forces shouldn't limit the number of staff provided to the ROCU.</p>	2	0
		<p>By 1 July 2023, chief constables and police and crime commissioners should make sure they give funding in line with HM Treasury's three-year settlement. They should also provide a sufficient capital replacement budget.</p>		

SUPER COMPLAINTS CURRENT OVERVIEW

Date	Title	Recommendations	Total Number Outstanding	Total Number Closed
Dec 2020	Safe to share - Report on Liberty and Southall Black Sisters super-complaint on policing and immigration status - All recommendations are closed			
May 2021	Report on Hestia's super-complaint on the police response to victims of modern slavery - All recommendations are closed			
Aug 2021	A duty to protect: Police use of protective measures in cases involving violence against women and girls - All recommendations are closed			
Dec 2022	How the police respond to victims of sexual abuse when the victim is from an ethnic minority background and may be at risk of honour-based abuse - All recommendations are closed			
Apr 2023	Super-Complaint on Police Response to Stalking <u>STATUS</u> – An update on all recommendations have been received and this information has now been shared with OPCC in order that a joint response may be sent.			
		Police must work with the Crown Prosecution Service, Home Office, Ministry of Justice and National Probation Service to implement a unified recording system which allows one to follow the journey of a victim through the criminal justice system, and track attrition rates from reporting stage through to conviction, including sentencing.	4	0

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		Police forces should consider investment in improving digital evidence retrieval for cyberstalking (e.g., in cases of online spyware and hacking).		
		Police must treat 2 or more breaches of any order (including a Stalking Protection Order, Restraining Order, Non-Molestation Order or bail conditions) as a separate offence of stalking as set out in the CPS Guidance.		
		Any statutory guidance on the police response to stalking (including guidance on the identification and investigation of stalking) should be developed in consultation with experts from the National Stalking Consortium.		