

Report title: Process of Recruitment and Vetting for Police Officers in Essex	
Report to: Essex Police, Fire and Crime Panel Ethics and Integrity Sub-Committee	
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Date: 22 March 2022	For: Noting
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County Divisions affected: All Essex	

1. Purpose of Report

At its meeting in October 2021, the Essex Police, Fire and Crime Panel requested a report on the process of recruitment / vetting for police officers in Essex following the murder of Sarah Everard by Wayne Couzens, who was then a serving officer with the Metropolitan Police Service. This report responds to that request by setting out the Essex Police position in relation to a letter from the National Police Chiefs' Council dated 8 October 2021 which detailed several key requirements for Police Professional Standards Departments and Vetting Units across the country.

2. Recommendations

That the Essex Police, Fire and Crime Panel's Ethics and Integrity Sub-Committee notes the content of the report.

3. Context / Summary

Recruitment and vetting of officers and staff within Essex Police are the responsibility of the Chief Constable as the employer. The force's Professional Standards Department (PSD) has responsibility for various areas of policing, including counter corruption, prevention and enforcement as well as vetting on behalf of the Chief Constable. Reporting to the Deputy Chief Constable, the department is led by a Detective Superintendent supported by a PSD DCI, a Counter Corruption DCI and the Force Vetting Manager (a member of police staff). A new Counter Corruption Unit (CCU) DCI has recently been appointed as part of the force growth plan and this role will be pivotal in terms of future plans and processes within the CCU.

On 6 October 2021, the National Police Chiefs' Council (NPCC) met to discuss the policing response to violence against women and girls following the murder of Sarah Everard. At this meeting, a series of key requirements were agreed in relation to police officer vetting and professional standards. This report sets out the position of Essex Police against those key requirements.

Key Requirement: *Forces should review compliance with the NPCC's Vetting Authorised Professional Practice (APP). Any deviation should be underwritten, with a documented rationale, by the designated Chief Officer lead.*

Essex position: It is important to note that, up until 2017, the vetting APP was received by the national vetting community as guidance and best practice, localised in each force dependent on the threats, appetite for risk and interpretation. In October 2017, the Code of Practice became legislative, and the accompanying APP was then enforced by the National Police Chiefs Council (NPCC) / College of Policing (CoP) and subject to annual inspection by Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS).

Essex Police's Corporate Vetting Unit (CVU) has strived to comply with the APP since 2013, however resource issues have prevented full compliance with an 'all at once' approach. A structured implementation of the Vetting APP occurred between the release of the October 2017 APP and March 2018 and most areas of the APP were introduced. In 2019 and 2021 further reviews of the Vetting APP were conducted nationally. Most changes were marginal or tweaks of wording, with the exception of data capture of disproportionality, which was all new and historically very difficult to capture in the CVU due to limitations in IT capabilities.

Essex Police's Vetting Manager has conducted a 'light touch review' of the APP requirements. In summary, there are circa 73 main areas of responsibility for Vetting Units. Overall, the Force Vetting Manager's assessment is that the CVU is almost entirely compliant with the APP. There is no deviation from it, but the following areas are yet to be fully implemented as business as usual:

- a. **Forces must monitor vetting applications, at all levels, against protected characteristics to understand whether there is any disproportionate impact on particular groups. Where disproportionality is identified, forces must take positive steps to address this, while maintaining the safeguards that vetting provides. Developing, implementing and maintaining risk management strategies will be key here.**

Currently, protected characteristics are recorded for all refusals but not for all passes as, at the time of vetting, the CVU does not know whether someone will go on to be employed or to be refused at another stage. However, statistics for every employee have now been obtained and analytical work is underway to develop appropriate risk management strategies. The new Counter Corruption Unit DCI will lead on this piece of work to support the Vetting Manager.

- b. **The complaint and misconduct history should be recorded on the PSD complaint and misconduct database of the receiving force (as a 'miscellaneous' matter). This is so that an examination of the officer or staff member's history can be made by the Appropriate Authority or Investigating Officer as part of the severity assessment in any future complaints or conduct matters. Any intelligence should be forwarded to the receiving force's Counter Corruption Unit.**

This has been identified as a gap within the CVU. For any transferees, a record of the person's complaints and conduct history is shared between Vetting Units and decisions are taken based on that information. Furthermore, adverse intelligence is

shared between Counter Corruption Units and effective processes are in place. The gap is around the recording of historical complaints and conduct history on Centurion, which is the overarching PSD database on which all complaints and conduct matters are recorded. A record is currently held within the CVU, but it needs to be more readily accessible for all PSD staff. Moving forward, the Force Vetting Manager will ensure the CVU shares complaints and conduct history for transferees with the PSD Administration Team so that these can be recorded onto Centurion. There have been 86 transferees in Essex over the past five years. Work is now underway to back record convert, with priority focus on any officers / staff with a conduct history relating to violence against women and girls.

- c. Following the conclusion of a misconduct hearing or meeting where the officer, special constable or member of staff is not dismissed but has been issued with a written warning or a final written warning, a review of vetting clearance should be carried out. The review includes a consideration of the applicant's suitability to maintain the level of clearance held and to continue in the post they occupy.**

Currently, any gross misconduct sanction is forwarded to the CVU for a review of vetting clearance. However, for misconduct only cases, where officers and staff could receive a written or final written warning, this information was not previously being shared with the CVU for a vetting review. As a result of this key requirement, processes within PSD have been changed and the CVU now conducts vetting reviews of all officers and staff who receive a written warning or final written warning for a misconduct matter.

To provide a more objective viewpoint, a formal review of the CVU has been commissioned by Chief Officers and is currently being conducted by the Audit and Review Team within Essex Police's Strategic Change department.

Key Requirement: *Review capacity and capability to deal with vetting demands including recruitment, renewals and aftercare.*

Essex position: Significant investment has been made into the CVU, with the establishment increased from 5 to 25 FTE as part of the force growth programme. The investment in growth has precipitated a significant decrease in vetting backlogs, from 821 in Quarter 3 of 2020/21 to 142 as at 9 March 2022.

An extensive programme of work has been in place since the current Force Vetting Manager assumed leadership of the CVU in 2013, whereby the Unit has been renewing all clearances. There are currently more than 8,200 people holding a valid clearance giving them access to buildings and / or data. On average 1,000 clearances expire a year, but not all require re-vetting due to some no longer requiring the clearance. The CVU is currently requesting staff and officers to complete their renewals in advance of their expiry, which is the best position the force has ever been in.

Furthermore, the CVU has been at the forefront of several innovative change programmes led through the 7 Force Collaboration Programme which has seen the implementation of an upgraded IT system (Corevet), a robotics product which uses a 'bot' to conduct automated searches against a number of different IT systems to increase efficiencies, and now a standardisation programme which aims to bring a more consistent and efficient approach to vetting across all forces in the eastern region.

Key Requirement: *Review and understand current backlogs in vetting demand particularly if you have an outstanding action plan from the HMICFRS 2016 inspection*

Essex Police does not have an outstanding action plan from the HMICFRS inspection. The following Area for Improvement (AFI) was invoked following the 2016 inspection:

‘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’.

This AFI has been satisfied following a series of updates to HMICFRS and, as such, is no longer live. Notwithstanding this, the Force Vetting Manager met with Strategic Change to review this AFI again and to test the current Essex Police position in light of the impending HMICFRS review and the likelihood of vetting being subject to an enhanced level of focus in the current climate. Suffice to say, the assessment was that the CVU is still fit for purpose and compliant in every respect.

The current backlogs are very well understood within the CVU and subject to continual review by the Force Vetting Manager. The CVU works to a priority order list as set by Chief Officers, which is as follows:

- Renewal of vetting clearances
- Transferees and re-joiners
- Growth posts
- Vetting upgrades
- Police Constable recruitment
- Special Constable recruitment
- Volume recruitment (e.g. Force Control Room)
- Police staff recruitment
- Contractor vetting (those who are not eligible for National Contractor Vetting Scheme (NCVS))
- Partnership vetting (e.g. for shared accommodation, such as with Councils)
- Volunteer vetting (e.g. Active Citizens / Community Safety Accreditation Scheme / Cadets / Chaplain)
- All other vetting (e.g. IT project access for external companies)

The backlog as of 9 March 2022 within the CVU was as follows:

Upgrades (growth posts)	57
Business Services	4
Transferees	7
Police staff (new)	31
Re-vetting	5
Contractors	38
Total	142

Of the above, the only officers / staff who were already working within the organisation were the 57 awaiting upgrades. These are existing officers and staff, who are already vetted but who need enhanced vetting due to taking on a new role. The Force Vetting Manager is working closely with other Commands to prevent officers / staff from being posted into these new posts prior to having the correct vetting status.

In addition to the above, there are (as at 9 March 2022) 71 new police recruits and Specials in need of vetting. These numbers are not included within the total backlog as new recruits and Specials are always vetted within the required timeframes and these numbers include those officers who are not yet due to join their intake. It is therefore considered these are not part of the 'backlog' as there are no vetting delays preventing them from joining or moving roles.

The force is due some large intakes, so the figures are expected to increase over the next two months. However, the CVU is confident that this can be managed by the team in a timely manner.

The risk in the backlog from an individual officer / staff viewpoint is therefore minimal, the only real risk being the impact on the wider force by not having these officers / staff in post.

***Key Requirement:** The NPCC encouraged forces to be cognisant that corruption threats are most commonly raised in respect of transferees and to ensure their counter corruption response adequately responds to that threat.*

Essex position: Training has been delivered across the force and every new recruit who joins Essex Police is subject to an input from the Professional Standards Department setting out clear expectations in relation to the Code of Ethics and the Standards of Professional Behaviour.

The Bedfordshire, Hertfordshire and Cambridgeshire Constabularies have a combined Counter Corruption Team, which was visited by Essex's new Counter Corruption DCI in late 2021. One of the main differences compared to Essex is the existence of a dedicated Prevention Team within the joint CCU. The Prevention Team has several functions, primarily:

- Engaging with and delivering training to external agencies who may have contact with police officers to educate them about the dangers / indicators of Abuse of Position for Sexual Purposes and encourage the sharing of intelligence.
- Delivering internal training to the new workforce and continuing this training as themes develop.
- Managing all business interests, notifiable associations and declarations of gifts and hospitality. The team uses a risk assessment tool to understand all the information and works with the CCU as the risk assessment dictates.
- Recruiting and training local PSD champions who are Local Policing Area (LPA) / Community Policing Team (CPT) officers but who deliver PSD messaging to the wider workforce.
- Considering hot spots (driven by analytical data) where the most complaints / reporting occur so that the force can target prevention and enforcement activity appropriately.

When considering the current climate in relation to violence against women and girls and the new Professionalism Strategy, the introduction of such a team into Essex would align with the ambitions and deliver a meaningful preventative programme of work which could positively impact on police culture and the force as a whole. On this basis, a 2022/23 growth bid has been submitted which will build additional capacity in the prevention space and make PSD more visible and accessible to the wider workforce.

Key Requirement: That, when recruiting uplift officers, forces should ensure that they engage regulation 13 of the Police Regulations 2003 against those student officers that exhibit evidence of (a) not being mentally fitted to or (b) not likely to become a well conducted Constable. The NPCC noted that swift and robust discharge from service provides for a declaratory effect against student officer misconduct and embeds the expectation of the public and the force that the highest standards of professional behaviour will be upheld both on and off duty.

Essex position: There have been historical cases in Essex where officers have been dismissed from the organisation through the Regulation 13 route and there is a good working relationship between PSD and the Essex Police College on this subject. However, it should be noted that Regulation 13 cannot be invoked when dealing with allegations of gross misconduct. In the context of the request for this report, most allegations concerning sexualised behaviour will be assessed as gross misconduct and would therefore need to be investigated and dealt with via the normal disciplinary route. Notwithstanding this, Regulation 13 may be appropriate to address any concerning behaviour at an early stage of an officer's career and work is now underway to review its application in conjunction with the Essex Police College and HR department.

Key Requirement: The onus is on individual officers / staff to report any material change in circumstances. Consider refreshing work force messages of responsibility and link to annual integrity checks / questionnaires.

Essex position: The work generated by this requirement must not be underestimated. At any one time, the force has circa 8,000 people holding clearances and to proactively request people to update all changes in their circumstances could overwhelm the CVU in terms of capacity.

Multiple processes have been put in place to capture this and, as soon as changes are received, they are actioned, However, it should be noted that, whilst not all people comply with this requirement, all personnel in receipt of a vetting clearance are instructed to inform the CVU of any change to their circumstances via email when their clearance is approved and that the annual 'Line Managers Checklist' requests all employees to notify the Corporate Vetting Unit of all changes to circumstances

Overall Conclusion

The overall assessment is that Essex Police's Professional Standards Department and its Corporate Vetting Unit are in a healthy position – and indeed the best position they have ever been in - when compared against the key requirements in relation to recruitment and vetting as set out by the NPCC. Through the new force Command Team structure, further force growth and finessing of current processes and procedures,

the department will be in a stronger position and better skilled and equipped to manage demand, prioritise based on risk and focus more on learning and prevention.

4. Appendices

None