

Appendix 1

Update Report on Recommendations and AFIs for Chief Constables in the HMICFRS report 'An inspection of vetting, misconduct and misogyny in the police'

RAG ratings					
RED	Recommendation / AFI will not be, or is unlikely to be, implemented in full by its deadline				
AMBER	Recommendation / AFI will be, or is likely to be, implemented in full by its deadline				
GREEN	Recommendation / AFI has already been implemented in full				
RAG Rating (please mark with an X):					
RED		AMBER		GREEN	x
Recommendation 2					
<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>Essex Police's Corporate Vetting Unit (CVU) is fully compliant with this recommendation. This information is recorded on the Corevet, Centurion and CCU Intelligence systems.</p>					
RAG Rating (please mark with an X):					
RED		AMBER		GREEN	x
Recommendation 3					
<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. 					
<p>A process is in place between the CVU, CCU and HR to ensure risk mitigation is in place where adverse information / criminal association is declared. During the HMICFRS vetting and CCU inspection in November 2022, 40 vetting cases were reviewed and not one error was identified.</p>					
RAG Rating (please mark with an X):					
RED		AMBER		GREEN	x
Recommendation 4					
<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>Essex Police's CVU is fully compliant with this recommendation. During the HMICFRS vetting and CCU inspection in November 2022, 40 vetting cases were reviewed and not one error was identified. There is a standardised decision-making form which follows the National Decision Model and this was shared with HMICFRS during the inspection.</p>					
RAG Rating (please mark with an X):					
RED		AMBER		GREEN	x

Recommendation 7

By 31 October 2023, chief constables should introduce an effective quality assurance process to review vetting decisions, including routine dip sampling of:

- rejections; and
- clearances where the vetting process revealed concerning adverse information.

Essex Police’s Corporate Vetting Unit (CVU) Supervisors and / or the Force Vetting Manager (FVM) counter sign every failure and / or significant adverse information. The Head of Department routinely QAs the FVM’s decisions. Under consideration is to QA a higher quantity and more regularly, with a clear governance structure in place. During the HMICFRS vetting and CCU inspection in November 2022, 40 vetting cases were reviewed and not one error was identified.

RAG Rating (please mark with an X):

RED		AMBER		GREEN	X
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Recommendation 8

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.

HR has a buddy scheme and the CVU attends a weekly meeting to progress all ethnic minority applications and unblock any issues. The CVU holds and produces ethnic minority vetting data which seeks to identify any disproportionately in failure rates. The data is difficult to interpret as ethnic minority applicant numbers are low and small numbers of failures can present as large percentage disparities when compared with white applicants. However, every ethnic minority application is subject to a five-stage review process, and the force can accurately identify, track and measure disproportionality in vetting decisions. This process was shared during the local HMICFRS inspection and we are now fully compliant.

The CVU is satisfied that every failed ethnic minority applicant has failed in accordance with APP and decisions would withstand future scrutiny. However, more work needs to be done in this area. The Professional Standards Department is currently reviewing and exploring all national requirements, including the 'Shining a Light on Betrayal' report to identify any gaps. It should also be noted there is no mandatory requirement for applicants to declare their ethnicity, so there are further gaps in our data.

RAG Rating (please mark with an X):

RED		AMBER		GREEN	X
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Recommendation 11

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 their vetting status is reviewed.

There is a process in place within PSD to flag up and conduct vetting reviews on all officers / staff subject to a misconduct sanction, so we are fully compliant with this recommendation.

RAG Rating (please mark with an X):

RED		AMBER	x	GREEN	
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Recommendation 13

By 31 October 2023, chief constables who have not already done so should establish and begin operation of a process to:

- 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.

As soon as possible after this, these chief constables should:

- 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.

The Essex CVU maintains a master Excel list of all officers and staff, detailing their current posts and vetting statuses. However, the process to maintain this list is resource intensive and not the best IT solution for managing such an important piece of work. Work is ongoing to ensure processes are streamlined in order to support the upkeep and maintenance of the master record, and the CVU is also exploring whether CoreVet (the nationally recognised vetting IT system) could be better utilised. This also needs to be considered against the backdrop of a large and constantly moving workforce who take up new posts and different roles every day, across multiple Commands. That said, HMICFRS was extremely complementary about the process within the CVU. During the hot debrief, the lead inspector stated that, *“With a few exceptions, the whole of the workforce is vetted and, where they are not, the Vetting Manager knows the details of them and can clearly pinpoint them through tracking on bespoke designed spreadsheets”*.

RAG Rating (please mark with an X):

RED		AMBER		GREEN	x
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Recommendation 15

By 30 April 2023, chief constables should:

- 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.

The newly launched Line Managers Checklist has the requirements to remind officers and staff - it requires advertising and reinforcement with managers to complete. All applicants are told upon clearance that they must submit all changes to vetting. Robust supervision and monitoring will determine compliance levels. In June 2023, the force checked compliance levels for the Line Managers Checklist, the results of which were as follows –

Status Text	Total by Status	% Total
Complete	6,311	92.43%
Initial	1	0.01%
In Progress	516	7.56%
Total:	6,828	

Essex Police believes it is now fully compliant with this recommendation.

RAG Rating (please mark with an X):

RED		AMBER	x	GREEN	
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Recommendation 16

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:

- 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.

Awaiting the national guidance from the College of Policing and NPCC lead for Counter Corruption to shape the national structures and processes. In light of the recent national climate following the PC Carrick case, national work is ongoing to ensure every officer and member of staff is PND checked. Essex is contributing to this national requirement and will await the national direction moving forward. All CVU staff are being re-trained in the use of PND, including bulk uploads and scheduled searching to ensure checks are conducted more routinely, as opposed to just during the vetting and re-vetting stages.

RAG Rating (please mark with an X):

RED		AMBER		GREEN	x
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Recommendation 18

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:

- o consistent recording of allegations;
- o improved investigation standards; and
- o sufficient support for victims and compliance with the [Code of Practice for Victims of Crime in England and Wales](#).

We are compliant in this area, with tried, tested and established processes in place, which work effectively. All criminal allegations reported by one member of Essex Police against another member of Essex Police are recorded in line with the National Crime Recording Standards. Allegations of on-duty criminal behaviour are investigated by the Essex Police Professional Standards Department (PSD). Allegations of off-duty criminal behaviour are investigated by a team outside of the area / command in which the Essex Police member suspected of a crime works. Specialist investigators are deployed to investigate the reported criminal behaviour, as and when required. For example, the Adult Sexual Offences Investigation Team will investigate an allegation of rape. The PSD monitors the progress of the criminal investigation (where they are not the investigators) and holds a separate conduct investigation in subjudice (as required).

The PSD, including the Counter Corruption Team, will support a criminal investigation being completed by another team, as and when requested. Where there are particular sensitivities with alleged off-duty criminal behaviour, the PSD may also take those cases on. Criminal investigations are subject to initial and subsequent regular supervisor and manager reviews. This includes setting of case action plans and reviews against actions set.

The PSD reviews all criminal cases following an outcome disposal before commencing the conduct investigation element (unless parallel enquiries are running, in which case there is close liaison between the two teams). The PSD review can identify, task and complete additional actions. VCC duties and requirements are managed in accordance with statutory requirements, with twice weekly centralised report dissemination of VCC compliance. VCC updates are a mandatory update requirement at the force daily management meeting.

All Essex Police members who are victims of crime receive the same level of support as a non-police member, with referrals to external support agencies being made as required. Additionally, Essex Police offers in-house support through a nominated welfare officer, support organisations and occupational health.

Following the HMICFRS inspection of Essex Police in November 2022, confirmation was received that this recommendation could be closed.

RAG Rating (please mark with an X):

RED		AMBER		GREEN	x
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Recommendation 20

By 30 April 2023, chief constables should adopt the NPCC sexual harassment policy.

A new Essex Police policy was published in February 2023 in line with the NPCC Sexual Harassment Policy following consultation. We are now fully compliant.

RAG Rating (please mark with an X):

RED		AMBER		GREEN	X
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Recommendation 24

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.

A new tag has been created on Centurion, which is the national PSD IT system. When allegations come into PSD, checks are conducted on both Centurion and the CCU intelligence system to identify whether there have been previous conduct matters, intelligence or concerns, which need to be considered in conjunction with any new assessment and decision making. We are therefore compliant.

RAG Rating (please mark with an X):

RED		AMBER		GREEN	x
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Recommendation 25

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:

- 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.

All investigations within the PSD / CCU are led by a Detective Inspector or Detective Sergeant. The investigation described in the recommendation is routine for PSD / CCU investigations and will form part of the investigative Main Lines of Enquiry. Following the HMICFRS inspection in November 2022, it was agreed this recommendation could be closed.

RAG Rating (please mark with an X):

RED		AMBER		GREEN	x
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Recommendation 26

By 30 April 2023, chief constables should make sure their professional standards departments:

- 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.

Every conduct investigation has Terms of Reference, which set the parameters of the investigation. Once a case is tasked to the Essex Police Professional Standards Department (PSD) Investigation team to investigate, a DS is required to complete an initial review and investigation plan. This review covers:

- Outline of the circumstances of the case
- IOPC referral and involvement
- Severity Assessment – who completed it and what was it set at?
- Whether it is a crime or conduct investigation (along with primacy)
- Details of Regulation notices / notices of investigation and Terms of Reference served / to be served
- Suspension or restriction details
- Investigating officer details and declaration of any conflict of interest (and, if there is, what action is being taken).
- Details of the officer / staff member under investigation and details of when and how contact is to be maintained.
- Welfare management of the officer / staff member
- Details of Federation or Unison representation and support
- Details of the complainant and update requirements

- Designation of Interested Parties and update requirements
- Timeliness monitoring and action completion recording requirements
- Main Lines of Enquiry to be progressed
- Media management

The DS is then required to complete regular periodic reviews of each case, addressing the key points of the investigation as it progresses. Timings of case reviews are determined by the status and progression of the case.

Every investigation has DI oversight, with particular attention paid to cases that are assessed at gross misconduct. The Head of PSD reviews every conduct case which requires a determination as to whether there is a case to answer or not. The Head of PSD is a Detective Superintendent who, as part of their case review, checks to ensure all reasonable and proportionate lines of enquiry have been completed and all areas of the Terms of Reference have been addressed. The PSD DCI reviews all cases where there is a submission that a re-assessment is required because the circumstances upon which the original conduct assessment was made are now known to be different / not to apply. There is additional PSD DCI oversight for violence against women and girls (VAWG) conduct cases and those cases reaching their 12-month timeliness reporting stage.

RAG Rating (please mark with an X):

RED		AMBER		GREEN	X
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Recommendation 28

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:

- o victims and witnesses were properly supported;
- o all appropriate authority assessments, including assessments which didn't result in a complaint or misconduct investigation, were correct;
- o investigations were comprehensive; and
- o 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.

This recommendation describes the national VAWG Taskforce work which PSD fully supported and a review was undertaken on all cases during the past 3 years. Broadly, all findings were positive, with some gaps identified around signposting victims to support and a historical disconnect between Commands leading on the criminal investigation and PSD dealing with the conduct. Both these gaps have been addressed and investigations were found to be of a good standard, with sound decision making and rationales. HMICFRS has seen and noted this update but prior to sign off, the evidence presented will need to be tested by the Force Liaison Lead.

RAG Rating (please mark with an X):

RED		AMBER		GREEN	X
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Recommendation 29

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.

Both PSD and Learning & Development have a good understanding of the Regulation 13 process. The PSD DCI has regular meetings with Learning & Development and works closely with HR and training is about to be delivered to a number of key Commands. The challenges remain around the Regulations and Home Office Guidance, which firstly places a reliance on an admission made by the officer and, secondly, dictates that matters of gross misconduct should be dealt with through the misconduct route and not Regulation 13. We have ongoing examples and recent officers dismissed through the Regulation 13 process.

RAG Rating (please mark with an X):

RED		AMBER		GREEN	X
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Recommendation 32

By 30 April 2023, chief constables should make sure that:

- 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.

Intelligence relating to sexual misconduct is managed through our Operation Pershore process. This involves an objective risk assessment and scoring matrix to determine the risk someone poses. Based on this assessment a person may be adopted as an Operation Pershore nominal and if so, they are subject to periodic and ongoing monitoring.

RAG Rating (please mark with an X):

RED		AMBER		GREEN	X
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Recommendation 33

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:

- 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.

Since the last HMI inspection, the CCU has built relationships with a number of partner agencies who support vulnerable people. In 2021/2022 we provided training on AoPSP to over 200 people from 20 external organisations. The new Prevention and Engagement Team is now established and there is a comprehensive programme of work, which includes a number of training sessions and inputs to partners around spotting the signs of AoPSP and how they can report it. Essex Police is now fully compliant with this recommendation.

RAG Rating (please mark with an X):

RED		AMBER		GREEN	X
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Recommendation 34

By 30 April 2023, chief constables should make sure that their counter-corruption units actively seek corruption-related intelligence as a matter of routine.

The counter corruption teams do conduct proactive intelligence development. This includes analysis of mobile phone billing for repeated / high contacts, Organised Crime Group / County Lines contacts. We have a reliable lawful business monitoring system which we use both proactively and reactively, and especially in cases of sexual misconduct. We have just recruited our first Systems Analyst and Auditor, who will significantly enhance our proactive capability through systems monitoring. We also have the support of the regional Anti-Corruption Unit which works in this proactive space looking at cross border corruption. Their Operation Dioptra (data washing against OCG / police telephone numbers) is a good example of this.

The HMICFRS report following our November 2022 inspection stated that "The force used a variety of techniques to develop and investigate corruption-related intelligence. We found good supervisory oversight throughout". We are now compliant with this recommendation.

RAG Rating (please mark with an X):

RED		AMBER		GREEN	X
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Recommendation 35

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:

- 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.

The force utilises software procured through the 7F collaboration to monitor force systems. Software is used both reactively and proactively to identify signs of sexual misconduct and wider wrongdoing. As a force we have just recruited our first Systems Analyst and Auditor who will become the SME for this software and have responsibility for developing and enhancing our monitoring capability. The force has also recruited specialists who will support the monitoring process.

In November's HMICFRS inspection it was noted that "the force can monitor all its IT systems across handheld, mobile and desktop devices. It proactively checks activity on mobile devices. This helps identify potential misconduct including improper contact with vulnerable victims or organised crime groups. The force monitors individuals when intelligence shows they pose a higher risk of sexual misconduct. We also saw evidence of IT monitoring of people who were the subject of other corruption intelligence." The report also noted that "The force has a lawful business monitoring (LBM) policy. The policy allows the CCU to audit all force mobile phone data. In addition, it allows for proactive monitoring of IT systems in support of force's approach to tackling corruption."

When specifically reporting on intelligence development it was recognised that "the force used a variety of techniques to develop and investigate corruption-related intelligence. We found good supervisory oversight throughout. We found two cases of proactive intelligence collection. These resulted from proactive use of the force IT monitoring system."

RAG Rating (please mark with an X):

RED		AMBER		GREEN	X
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Recommendation 36

By 30 April 2023, chief constables should establish and begin operation of an improved system of mobile device management, with accurate record keeping concerning:

- the identity of the officer or staff member each device is allocated to; and
- what each device has been used for.

IT has a good understanding of which officers are allocated what devices and this is managed through Viva Track and enhanced by the Blackberry Enterprise Server (BES). There are currently 4,809 mobile devices issued and attributed to staff.

During the inspection it was noted that the force could demonstrate effective management of mobile devices through existing systems. The report stated that "The force has a lawful business monitoring (LBM) policy. The policy allows the CCU to audit all force mobile phone data. In addition, it allows for proactive monitoring of IT systems in support of force's approach to tackling corruption. The force can attribute all force mobile devices issued to individuals across the workforce. Devices are issued to individuals only when with written acknowledgement of the force's LBM policy. This includes the instruction that devices can be used for 'work purposes only' and users should have no expectation of privacy".

Essex Police is now compliant with this recommendation.

RAG Rating (please mark with an X):

RED		AMBER		GREEN	X
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Recommendation 37

By 30 April 2023, chief constables should:

- 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.

This is a concept that has been developed in Durham and was recognised in a recent peer visit by the new Counter Corruption Prevention and Engagement Manager. This is not a process that Essex currently utilises but it will be a piece of work led by the Prevention and Engagement Manager in

consultation with HR / PIU. In summary, it's a mean of looking holistically at certain officers or staff, in terms of potential debt, conduct, sickness, business interests, and / or performance issues and seeing whether future risks can be identified. The new Prevention Analyst will play a key role in this piece of work once recruited.

The PSD already looks at the bigger picture when assessing risk and looking to identify patterns or themes through complaints, vetting, business interests and intelligence, but there may be a gap in terms of better liaison with HR, local management, and other relevant departments to better inform a holistic picture. The HMICFRS inspection confirmed that Essex Police is compliant with this recommendation.

RAG Rating (please mark with an X):

RED		AMBER		GREEN	x
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Recommendation 38

By 30 April 2023, chief constables should make sure that all corruption-related intelligence is categorised in accordance with the NPCC counter-corruption categories (and any revised version of these).

As a force, we already use the ACCAG Counter Corruption categories to classify all intelligence. HMICFRS has confirmed this recommendation can be closed as the force has demonstrated compliance.

RAG Rating (please mark with an X):

RED		AMBER		GREEN	x
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Recommendation 39

By 30 April 2023, chief constables should make sure they have a current-corruption strategic threat assessment, in accordance with the Counter-Corruption (Intelligence) Authorised Professional Practice.

As a force, we have a strategic threat assessment signed off by the DCC. HMICFRS has stated that this recommendation can be closed as the force can demonstrate compliance.

RAG Rating (please mark with an X):

RED		AMBER		GREEN	X
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Recommendation 40

By 30 April 2023, chief constables should make sure their counter-corruption units:

- o produce and follow an investigation plan, endorsed by a supervisor, for all counter-corruption investigations; and
- o check all reasonable lines of inquiry in the investigation plan have been concluded before finalising the investigation.

The CCU Standard Operating Procedure (revised 2022) details expectations of investigation and intelligence plans. In summary, all investigations / intelligence are initially assessed by a supervisor. Intelligence / investigations are also assessed at monthly intervals by a supervisor and, if a piece of intelligence cannot be developed into a positive intervention (investigation / Risk Management Meeting), it can only be closed with a supervisor's review.

The HMICFRS inspection report of Essex Police's CCU and vetting arrangements stated that " We reviewed 60 corruption intelligence files. We found two cases where the force chose not to make any intervention. This may have resulted in some missed opportunities to develop the intelligence further and mitigate corruption risks. In all other cases the counter-corruption Unit (CCU) responded effectively. The force used a variety of techniques to develop and investigate corruption-related intelligence. We found good supervisory oversight throughout. We found two cases of proactive intelligence collection. These resulted from proactive use of the force IT monitoring system".

All CCU investigations have an investigative plan endorsed by a supervisor with all reasonable lines of enquiry followed.

We are now fully compliant.

RAG Rating (please mark with an X):

RED		AMBER		GREEN	X
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Recommendation 41

By 30 April 2023, chief constables should strengthen their business interest monitoring procedures to make sure that:

- 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.

The Business Interest Policy is owned and managed by the Head of HR Resourcing, although the Counter Corruption Unit has a significant role in the decision making. Every application for a secondary business interest is first considered by the officer's line management. It is then assessed by the DCI Counter Corruption to consider any intelligence / history about the officer to appropriately assess any risks posed. The decision is then made by the Head of HR Resourcing considering the line manager's and DCI CCU's comments. The Head of HR Resourcing and DCI CCU will frequently meet to discuss applications and there is further scrutiny and governance through the Integrity and Counter Corruption Board. Moving forward, we will ensure that, as officers / staff move or change line management, the record of that Business Interest goes with them. HMICFRS, in its recent inspection report, stated that "policies were comprehensive and reflect the APP guidance. Each process involves individuals submitting an online form. We found the force was managing all these processes effectively. For example, clear links between the notifiable associations and vetting processes, local monitoring of business interest conditions and close monitoring of the gifts and hospitality register by the Deputy Chief Constable". Essex Police is now compliant with this recommendation.

RAG Rating (please mark with an X):

RED		AMBER		GREEN	X
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Recommendation 42

By 30 April 2023, chief constables should strengthen their notifiable association procedures to make sure that:

- 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.

The Counter Corruption (Prevention) APP lists the following as associations that should be disclosed: those with unspent convictions, those charged with criminal offences, those under investigation, those dismissed or required to resign from policing, private investigators, journalists and those who have associations with extremist groups. The Essex Police procedure on Notifiable Associations explicitly lists the above list as applicable associations.

There are currently 1,300 associations recorded within the Counter Corruption Unit. It will be a priority for the new Prevention and Engagement Team to review all recorded associations to ensure the risk is still appropriate and that any conditions imposed are being adhered to. This will be an ongoing process.

We do not routinely brief supervisors on notifiable associations relating to their staff but we will consider how we do this given the volume of associations and the varying degrees of risk associated with association.

The HMICFRS inspection report stated that, "At the time of our inspection, we found these policies were comprehensive and reflect the APP guidance. Each process involves individuals submitting an

online form. We found the force was managing all these processes effectively. For example, clear links between the notifiable associations and vetting processes, local monitoring of business interest conditions and close monitoring of the gifts and hospitality register by the Deputy Chief Constable". Essex Police are now compliant with this recommendation". Furthermore, a Notifiable Association marker has been added to CoreVet. Work is ongoing to ensure every person with an NA is recorded on CoreVet to enable regular reports to be produced to support CCU activity. However, we are compliant already based on the HMICFRS inspection comments, and this work is over and above what other forces are doing.

RAG Rating (please mark with an X):

RED		AMBER		GREEN	x
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Recommendation 43

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.

An annual integrity review is undertaken as part of the refreshed Managers' Checklist. The HMICFRS inspection report stated that "the force's personal development review (PDR) system, introduced in October 2022, includes an integrity question set. This specifically asks about any changes in personal circumstances. 94% of staff have completed their PDR". In June 2023, the force checked compliance levels for the Line Managers Checklist, the results of which were as follows –

Status Text	Total by Status	% Total
Complete	6,311	92.43%
Initial	1	0.01%
In Progress	516	7.56%
Total:	6,828	

Essex Police believes it is now fully compliant with this recommendation.

RAG Rating (please mark with an X):

RED		AMBER	x	GREEN	
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Area for improvement 1

Forces' use of vetting interviews is an area for improvement. In more cases, forces should interview applicants to explore adverse information of relevance to the case. This should help with assessing risk. When they carry out such interviews, forces should maintain accurate records and give copies of these to interviewees.

Since the pandemic, the FVM has not been conducting vetting interviews. The team manages the communication well via email and phone calls with the candidates. Interviews would be utilised on an ad hoc basis if there was a need. Should there be a requirement for an Interview the CVU would be fully compliant.

RAG Rating (please mark with an X):

RED		AMBER	x	GREEN	
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Area for improvement 2

Automated links between force vetting and HR IT systems are an area for improvement. When specifying and procuring new IT systems for these purposes, or developing existing ones, forces should seek to establish automated links between them.

The Force Vetting Manager has created a new process whereby HR data will also include vetting levels. Furthermore, the IT solution will enable the vetting unit to be informed when someone changes role, into one which requires a different level of vetting. This was shared with HMICFRS during the vetting inspection, and they were highly impressed with it.

Work is in progress to enable this IT solution to go live. The Force Vetting Manager has set up a working group with senior HR colleagues to progress the upload every employee's vetting status onto the SAP system. Once completed, HR will be able to run a monthly report, which will highlight

any employee who is in a post without the correct vetting status, and identify risks and issues which can then be addressed.

RAG Rating (please mark with an X):

RED		AMBER	x	GREEN	
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Area for improvement 3

Forces' understanding of the scale of misogynistic and improper behaviour towards female officers and staff is an area for improvement. Forces should seek to understand the nature and scale of this behaviour (like the work carried out by Devon and Cornwall Police) and take any necessary action to address their findings.

There is ongoing work through force level and local staff surveys to better understand the scale of the problem. The force has also invested in a new Professionalism Engagement Team as part of force growth, which includes analysts to develop and enhance data which then informs activity. The force has been robust around all conduct cases, with internal and external media strategies to deter future behaviour and make the force's position very clear. The force has a Head of Professionalism, who is also the tactical lead for VAWG and is delivering against numerous prevention focused programmes of work, in keeping with the new Professionalism Strategy, about how everyone looks, leads, works, learns and behaves. There is ongoing training to new recruits, supervisors and managers, with a real focus on misogyny and VAWG. The force's new Prevention and Engagement Team is now fully established, including 3 new engagement officers, a dedicated analyst and a systems auditor. A 12-month programme of work has been developed which includes training sessions, briefings, drop-in days and partnership activity. Furthermore, tactical proactivity has been increased to better identify inappropriate and misogynistic behaviour. Every public complaint is now tagged where it is VAWG related so we are able to see themes and trends emerging through our analytical work. The PSD has also set up an internal Independent Advisory Group (IAG) consisting of representation from each Staff Network and Association to help gain a broader understanding around policing culture and the scale of misogyny in Essex Police. As part of this group, live anonymised examples are shared to get a broad view in terms of what is and isn't acceptable behaviour and how serious the behaviour is considered to be. We are also about to go live with VAWG SPOCs in each command who will be able to signpost people to the right support or towards PSD if something needs reporting. This will be available by the VAWG SharePoint page. We also have a Task and Finish Group lead by a Superintendent to review how we investigate DA and serious sexual offences where the victim and perpetrator both work for Essex Police, to help protect all parties. The group will then present a number of recommendations around how improvements can be made. A new PSD dashboard is also being developed which will help identify potential cultural issues within individual teams, stations, departments and Commands, by presenting data in a way that gives a richer picture, overlaying complaints and conduct data which can be filtered down to team / individual levels.

RAG Rating (please mark with an X):

RED		AMBER		GREEN	x
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Area for improvement 4

Forces' data quality is an area for improvement. Forces should make sure they accurately categorise all items of sexual misconduct intelligence. Sexual misconduct cases that don't meet the definition of AoPSP (because they don't involve the public) shouldn't be recorded as AoPSP.

The ACPO Counter Corruption Advisory Group (ACCAG) categorises sexual misconduct into five distinct areas, of which one is AoPSP, and Essex categorises intelligence using these five categories. Only AoPSP where members of the public are affected is categorised as such. HMICFRS has confirmed this AFI can be closed as complete.

RAG Rating (please mark with an X):

RED		AMBER		GREEN	X
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Area for improvement 5

Workforce awareness of corruption-related threats is an area for improvement. Forces should routinely brief police officers and staff on the pertinent and sanitised content of their annual counter-corruption strategic threat assessment.

This is the primary purpose of the Prevention and Engagement team. The team is predicated on the idea that we must do more to inform our workforce (collectively and individually) of corruption threats and what they must do to identify and mitigate these threats. The fact that we are developing a team to manage this area and that we did so prior to this inspection demonstrates our recognition of the risk. The new Prevention and Engagement Team is now fully recruited to and embedded. Raising awareness around corruption-related risks and threats will be factored into their programme of work over the next 12 months through a number of bespoke briefings.