

DECISION MAKING MEETING

4 May 2020, 11:00 - SKYPE

Attendees

David Lloyd (Commissioner)
David Gibson (Deputy Commissioner)
Chris Brace (Chief Executive)
Gavin Miles (Deputy Chief Executive)
Amie Birkhamshaw (Director of Strategy)
Ian Rooney (CFO)

AGENDA

1. Minutes of meeting of 28 April 2020 **Approved with witness support proposal to be funded from CJ fund.**

2. HMICFRS Prevent National report **Noted. PCC to further consider the report in discussion with the Chief Constable at SEB.**



SEB HMICFRS
Prevent Inspection Re

3. HMICFRS MPS response to Henriques Report. **Noted. PCC to discuss any Hertfordshire implications with Chief Constable at SEB.**



SEB report on
HMICFRS inspection i

4. Constabulary ethics. **A discussion of the topic concluded with a view that the Chief Constable should be requested to provide some thoughts on how ethics is embedded and will be in the future with the paper due on ethical conduct and progress with the CSCJ plan.**

DECISION MAKING MEETING

28 April 2020, 10:00 noon - SKYPE

Attendees

David Lloyd (Commissioner)
David Gibson (Deputy Commissioner)
Chris Brace (Chief Executive)
Gavin Miles (Deputy Chief Executive)
Amie Birkhamshaw (Director of Strategy)
Ian Rooney (CFO)

MINUTES

1. Minutes of meeting of 2 April 2020 **Approved subject to adding some indication that future RSF bids will not be expected to cover engineering solutions which are the role of the highway authority.**



Minutes - Decision
Making Meeting- 2 Ap

2. HMICFRS Child protection Hertfordshire report **Noted and response to Home Secretary to be sent including noting concern and progress in PPU. Request some work on training for officers and staff interacting with child offenders, victims and others who come into contact with the criminal justice system, sharing the report with partners through PCC meetings with HCC.**



SEB Child Protection
Reports 2020 v2.docx

3. Witness Support **The proposal is approved in principle for launching as a pilot, subject to procurement options being considered,**

but source of funding may be more appropriate from crime prevention fund. To be discussed at HCJB on 29 April.



DMM - Xenzone
2_Addendum.docx

4. Community Safety Grant Approved subject to negotiation of condition to require targeting of services towards those schools assessed as in need by constabulary/OPCC.



DMM 28 Apr 2020
CSG Fearless Project



Copy of Appendix A
CSG Fearless Bid



Copy of Appendix B
CSG Fearless KPIs



Appendix C CSG
Fearless Crime Sessi

5. Property Update – Watford Approved



Watford MoU
report.docx



Memorandum of
Understanding V4.pdf

MEETING	Strategic Executive Board
DATE	14/05/20
TITLE OF REPORTS	Counter Terrorism Policing an Inspection of the Police’s contribution to the government’s Prevent programme
SUBMITTED BY	Chief Inspector Nick Lillitou
PURPOSE OF REPORT	To inform SEB of the main findings and the National Recommendations detailed within the HMICFRS’s report & to support compliance with s.55 Police Act 1996
DECISION(S) REQUIRED	None
FINANCIAL IMPLICATIONS	None arising from this report
RISK IMPLICATIONS	Any risk implications will be subject of assessment as the areas for improvement are worked through.
LEGAL IMPLICATIONS	s.55 Police Act 1996
EQUALITIES IMPACTS	Equality Act 2010
FREEDOM OF INFORMATION EXEMPTION SECTION IF APPLICABLE	Not applicable

1. Introduction

- 1.1- On 9th March 2020 Her Majesty’s Inspectorate of Constabulary and Fire & Rescue Service (HMICFRS) published a thematic report titled Counter Terrorism Policing an Inspection of the Police’s contribution to the government’s Prevent programme (Appendix 1).
- 1.2- HMICFRS made eight recommendations. Although not all are for forces to lead on, most have actions included within them for police.
- 1.3- A Task and Finish group and Action Plan have been established and managed by the Superintendent from Community Safety & Crime Reduction (CRCS) with Governance from Chief Officers. The recommendations will be cross referenced and added to the Action Management System (AMS). An update on progress will be brought to the Organisational Development Board (ODB) in May 2020.

- 1.4- Prevent is one of four strands of CONTEST often referred to as the 4 P's: Prevent, Pursue, Protect and Prepare. Prevent aims to stop people becoming terrorists or supporting terrorism. The objectives are to:
- Tackle the causes of radicalisation and respond to the ideological challenge of terrorism.
 - Safeguard and support those most at risk of radicalisation through early intervention, identifying them and offering support.
 - Enable those who have already engaged in terrorism to disengage and rehabilitate.
- 1.5- HMICFRS visited all Home Office forces as part of the inspection seeking to understand how effective the police are in contributing to Prevent. Hertfordshire is not referenced in the report.
- 1.6- The report is broken down into the following areas:
- Key findings.
 - Contest and Prevent Staff.
 - Training.
 - Strategic Oversight and Partnerships
 - Referrals Processes.
 - Prevent case management tracker.
 - Channel Panel.
 - Staff vulnerable to radicalisation or extremism.
 - The Counter-Terrorism Local Profile & Information sharing.
 - Performance management.
 - Appendix.

2. Key Findings

- 2.1- HMICFRS saw that policies and effective processes designed to protect people from being radicalised are in place, but not all forces have adopted innovative working.
- 2.2- Most forces have mandatory Prevent training but not all forces knew how many officers had completed the training because they did not monitor compliance and there is no training tailored to the role of each force's strategic lead on Prevent. Training should form part of the continuous professional development programme for strategic leads.
- 2.3- Not all officers / staff could recognise the signs of radicalisation, even those who had recently had training.

- 2.4- Most forces had a good and improving capability to support the multi-agency approach to Prevent.
- 2.5- Performance measures were not defined and there were also inconsistencies in how forms, processes and standards of referrals were used, which would benefit from greater scrutiny by Prevent leads.
- 2.6- In conclusion they found that in general, forces were meeting their Prevent duty with many positive aspects to the work police forces do. Examples of innovative working practices include development of Prevent SPOCs (Champions) and mapping hate crime with location-based extremist intelligence.

3. Contest and Prevent Staff

- 3.1- The CONTEST strategy is clear that the police have a critical role in Prevent, working in partnership to develop and support projects to prevent people from becoming radicalised and divert them away through the government's Channel programme.
- 3.2- The dedicated Prevent staff the HMICFRS interviewed, in positions funded by the national Counter Terrorism (CT), understood their roles about raising awareness of CT in others and providing training within the forces to other bodies and to communities. However, HMICFRS found that in forces with a high volume of referrals the staff focus largely on reactive case management and not community work.
- 3.3- CRCS have a good working relationship with the Prevent staff, located within ERSOU. They are aware of cases that Prevent are working on locally in Hertfordshire and should the need arise are confident there is sufficient capacity for local engagement work to be completed by them.
- 3.4- HMICFRS identified that a number of forces have or are in the process of introducing Prevent Champions (SPOCs). They hold various ranks and functions depending on local interpretation of the role. Most forces appoint a constable or sergeant who advises colleagues dealing with people identified as potentially vulnerable to radicalisation. This is a role that is currently being developed in Hertfordshire as part of the Action Plan.

4. Training

- 4.1- The dedicated Prevent staff told HMICFRS that the national training provided for their role was comprehensive and valuable and their forces and other bodies considered them to be the Prevent experts.
- 4.2- HMICFRS interviewed operational staff who were not routinely involved in Prevent work but generally assigned to some form of community, response or safeguarding roles.

They found staff had a good awareness of the Prevent-related responsibilities but didn't have a good understanding of the risk of radicalisation and how to recognise the signs, compared with other risks such as child sexual exploitation or hate crime.

- 4.3- HMICFRS found that all forces used Prevent computer-based or e-training packages. Most have made this training mandatory for officers and staff but because some forces didn't monitor compliance, not all forces could tell us how many of their officers and staff had done it. Many of the staff HMICFRS spoke to felt e-training was less effective than training provided in person. Staff told HMICFRS that training for safeguarding staff is particularly valuable because it links the Prevent duty with other strands of vulnerability. We were also told that vulnerability to radicalisation was not always an explicit theme in safeguarding training. At the time, this was not included in the College of Policing's public protection learning programme, which covers the Colleges 13 'core disciplines' of public protection. This has been updated to include a module on vulnerability to radicalisation in the national safeguarding training programme. HMICFRS believe that vulnerability to radicalisation should become the 14th discipline and make the recommendation below.

Recommendation - By June 2020, the College of Policing and the NPCC national lead for public protection and safeguarding should add vulnerability to radicalisation as the 14th core discipline of public protection.

Recommendation - By June 2020, the NPCC national Prevent lead and the College of Policing should develop a training and awareness package that encompasses continuous professional development for Prevent strategic leads in forces.

- 4.4- This recommendation contained numerous actions specifically for forces. These are being managed through the Action Plan which encompasses the implementation of recommendations within the Regional Counter Terrorism Local Profile (CTLP), driving Prevent with partners (statutory and non-statutory) and training. Training will be tailored to reflect the roles individuals hold across the organisation, with more in-depth training to the newly created Prevent Champions. In Hertfordshire, the CRCS Superintendent is the appointed Force Prevent Strategic Lead (FPSL), reporting to the ACC who chairs the CONTEST board locally and attends the regional meetings. Training will be delivered with the emphasis that Prevent is about vulnerability and safeguarding. This terminology is being already used in communication and briefings. Due to COVID-19, delivery times and methodology for the delivery of training are being developed.
- 4.5- HMICFRS found there was no Prevent guidance or training specifically tailored for those undertaking the role of Force Strategic Leads on Prevent and mixed levels of knowledge and a range of approaches in use, particularly in newly appointed staff and made a specific recommendation to the NPCC in relation to this. Hertfordshire is monitoring the NPCC response closely.

5. Strategic oversight & Partnerships

- 5.1- In most forces, a board chaired by a chief officer is responsible for strategic oversight of Prevent, usually the force CONTEST board. In Hertfordshire this is chaired by an ACC who also attends the regional meetings.
- 5.2- HMICFRS identified that some boards met infrequently or had only recently been re-established and a few forces held board meetings but had no underlying management structure to oversee Prevent work. In some regions they chose not to oversee certain Prevent activities: instead, they made it a function of their regional CTU or CTIU. In Hertfordshire, Regional Prevent attends the Hertfordshire CONTEST Board and the multi-Agency Prevent Board chaired by the Chief Inspector from CRCS. There are processes in place where Prevent shares a list of Prevent subjects weekly which are briefed to frontline staff.
- 5.3- HMICFRS found that up-to-date Prevent partnership action plans were not in place in all force areas and the plans supplied to the HMICFRS had a mixture of standards. The good plans contained clear objectives that were appropriately linked to the CTLP and took into account the challenges and requirements of the relevant CSP. The poorer plans lacked timescales and/or identified owners for actions and were up to two years out of date. In Hertfordshire each CSP maintains their own Action Plan produced by the Local Authority and given the varying demographics within the county they are tailored to the individual CSP needs. The standard is mixed and the Constabulary is working with the Prevent coordinator to standardise a form across Hertfordshire. Further guidance and support will also be provided with a view to raise the standard, standardisation and so that the plans form an inherent part of the overall Prevent action plan.

6. Referrals Processes

- 6.1- HMICFRS interviewed people from other organisations, identifying a mixed understanding of knowledge. Many interviewees were confident in the police's ability to manage the risks from radicalisation but not as confident their own staff would recognise vulnerabilities relating to radicalisation. Some non-police staff working in multi-agency safeguarding hub (MASH) teams were not familiar with the guidance on Prevent duties.
- 6.2- HMICFRS were told most police officers in safeguarding hubs and MASHs have had Prevent awareness training but not all understood vulnerability to radicalisation as well as other vulnerabilities. When they reviewed safeguarding training material, posters and force intranet content the HMICFRS found that information on extremism and radicalisation was often absent.
- 6.3- The Prevent policy states that a Prevent referral should be forwarded to the Fixed Intelligence Management Unit (FIMU) for assessment. In Hertfordshire, this is located in ERSOU. All available police information should be considered in making the assessment before any further action is taken. In some forces where the referral goes to the MASH

or a safeguarding team, initial safeguarding and information collection might happen before, or at the same time as the assessment by the FIMU.

- 6.4- Although not strictly in line with the Prevent policy, HMICFRS believe this is the right response as it balances the potential risk posed by the individual with the need to provide immediate help, where necessary. In Hertfordshire, the internal referral pathway is through Safeguarding and the Intelligence Unit. The referrals are shared with Prevent who then ask Fixed Intelligence Management Unit (FIMU) located and managed through ERSOU to conduct intelligence research. Currently the Multi Agency Safeguarding Hubs (MASH) do not manage these referrals. This was considered when the MASH was originally set up however the Prevent work is much wider than the current remit and outside of the existing terms of reference. Whilst changes could be introduced, further assessment and consultation would naturally be required. CRCS report that under the current arrangements there is no increased risk without MASH involvement but changing the arrangement may bring some efficiencies. This will be assessed.
- 6.5- HMICFRS believe that the referral forms should specifically cover radicalisation as staff are less likely to consider this aspect of vulnerability in comparison to other vulnerabilities, if they do not see it as an option. In Hertfordshire, we utilise the Safeguarding referral pathway through Athena.
- 6.6- HMICFRS highlighted that when forms are submitted, often feedback is not received. This is not uncommon across many areas of policing resulting in a lost opportunity for staff to learn from any errors and common areas for improvement being identified. Whilst there is not a recommendation, forces should provide feedback where practicable, as this would help build confidence and encourage further referrals. Feedback is provided by ERSOU but this is not consistent, the experience of CRCS is that in the main it is not normally the Police referrals that raise concerns. This area will be taken forwards for further development in the action plan (10.7).
- 6.7- HMICFRS made reference to two particularly important processes for Prevent referrals and that inconsistent decision making is leading to different referral rates.
- The information handling process within FIMUs.
 - The force process for handling referrals once the FIMU has completed its tasks.
- Despite national guidance from the National Counter Terrorism Policing Headquarters (NCTPHQ), HMICFRS found a few inconsistencies between similar cases resulting in different referral rates across forces and regions. This inconsistency is apparent in the NCTPHQ 'Prevent capability' data report, which highlights the differences between regions and suggests reasons for this. The inconsistencies mainly related to different assessments thresholds and some subjective assessments in identifying the terrorism element not being correctly applied.

6.8- The Prevent leads in CRCS have not seen the data report and are mindful the work of the FIMUs are managed through ERSOU. Therefore, this area and our understanding needs further development and will be progressed via the action plan and in consultation with ERSOU.

Recommendation - By June 2020, the NPCC national Prevent lead should review the national business assurance process to assure compliance with NCTPHQ policy.

7. Prevent Case Management Tracker

7.1- HMICFRS found the Prevent Case Management Tracker (PCMT) is not integrated with other police computer systems, which can inhibit the exchange of intelligence. For Hertfordshire the PCMT is managed by ERSOU. HMICFRS also found that within FIMUs there were staff who could not access the PCMT made the following recommendation for the NPCC which will locally will need to be managed by ERSOU.

Recommendation - With immediate effect, the NPCC national Prevent lead should make sure that all fixed intelligence management units have sufficient access to the Prevent case management tracker.

8. Channel Panel

8.1- Channel is a programme that “focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism”. HMICFRS found that that most Channel processes worked effectively in forces.

8.2- HMICFRS raised concern that police attendance at Channel Panels was inconsistent, with different officers attending meetings or attendance only when there is a specific need. They found some meetings were not held in accordance with the timetable set out in the guidance creating a risk that cases are not being reviewed well enough to manage the risk effectively and made the following recommendation:

Recommendation- With immediate effect, the NPCC national Prevent lead and each force Prevent lead should review the attendance of force representatives at Channel panels so that police are correctly represented by decision makers who can contribute to managing risk.

All force actions:

In addition to Prevent case officers, non-CT local officers can add value and tactical options to their local Channel Panel and should attend. Further guidance will be provided by CTPHQ to assist in identifying who this should be, which will vary due to local context.

All forces should develop Prevent SPOCs, including lower risk forces where there are significantly fewer CT resources. A role profile for Prevent Champions is already in existence and being used within some forces. This profile will be shared in due course.

HQ action:

It is essential that a Prevent specialist attends every Channel Panel to ensure the intelligence cycle into FIMU`s is not broken and guidance is provided.

8.3- In Hertfordshire, the Channel Panel is attended by the Chief Inspector from CRCS outside of CT Policing with appropriate decision making autonomy. Prevent Officers also attend and information from the meetings is shared as deemed necessary and appropriate. This is regardless of geographical location and with consent from the Panel / Panel Chair to ensure safeguarding and appropriate management of subjects locally.

8.4- The development of Prevent SPOCs (Champions) forms part of the action plan.

9. Staff vulnerable to radicalisation or extremism

9.1- HMICFRS reviewed force approaches to people in their organisations who may be vulnerable to radicalisation. Only one force had arrangements in place acknowledging that members of staff vulnerable to radicalisation might need safeguarding (the force is not named). The remainder rely on existing counter-corruption or misconduct policies and monitoring by supervisors.

9.2- Only two forces gave examples of having used a recognised Prevent referral approach to deal with a staff member who was vulnerable to extremism. HMICFRS found the vulnerability of staff generally was not referred to in forces but is a threat and made the following recommendation:

Recommendation - With immediate effect, the NPCC national Prevent lead should create national guidance for the police service on applying Prevent to the 'insider threat', to identify a range of options, such as selection processes, welfare and vetting, including guidance on risk thresholds.

All forces actions:

Forces should ensure that professional standards departments are aware of CT vulnerabilities and consider these within their case work. This will become increasingly relevant during the expansion of police recruitment and new training programs.

9.3- The action is embedded in the Prevent Action Plan. The Professional Standards Department (PSD) will be liaised with in respect of action necessary in their business areas and asked to consider local process.

9.4- Awareness training for our staff will be provided with guidance developed in consultation with PSD for those in supervisory roles on what to do in these circumstances.

10. The Counter-Terrorism Local Profile & Information sharing

- 10.1- HMICFRS found that partnership organisations had mostly positive views about sharing general and Prevent-related information. All forces shared the CTLP with senior representatives from other organisations but there was uncertainty about how the CTLP information could be used and shared more widely among staff in their organisations.
- 10.2- HMICFRS found although the CTLPs were not always produced in accordance with the NCTPHQ and Home Office format, they were generally consistent within a region. However, the CTLPs the HMICFRS viewed were not updated and there were mixed comments on the quality of the information provided. Some were described as useful reference documents that were effective and of great value, others as police driven, which was limited in its effectiveness locally and lacked relevance. The CTLP for Hertfordshire is produced by ERSOU as a regional document. CRCS are developing a Herts version to contextualise Prevent across the County, which is intended to help the refocus of Prevent Delivery Plans. The work is being completed with CSP Chief Inspectors to influence local authority partners who have statutory responsibility for this in their areas and will include Lessons Learnt and a mechanism for providing feedback to staff.
- 10.3- Hertfordshire County Council has recently recruited a Prevent Co-ordinator. Part of their role will include the delivery of CTLP recommendations in partner agencies. Discussions are in progress with the multi-agency Prevent Board to make these meetings more performance orientated. The appointment of the co-ordinator, together with the work CRCS are completing, should help to improve how the CLTP is used and influence work by CSPs through their own Prevent plans.
- 10.4- HMICFRS found examples of learning from incidents and the experience of others being passed on through formal processes or at peer-to-peer events but that in general lessons learnt are not effectively identified, shared or incorporated into action plans. The Parsons Green attack review (Operation Air) was used as an example. Some forces had reviewed the recommendations with other local organisations and some had made changes to their approach. CRCS have confirmed that a presentation was given last year on Operation Air and recommendations taken, these will be reviewed and incorporated into the Action Plan where applicable.
- 10.5- HMICFRS found that some forces pass on headlines or specific material to frontline staff and some only share the information with senior staff. The frontline staff the HMICFRS spoke to knew little about CTLPs, although there was evidence that some frontline officers in a few forces had contributed to the drafting of the CTLP. HMICFRS views are

that if the CTLP was shared more widely with staff, more useful information would be gathered to reinforce the understanding of the local threat and would assist in producing a more comprehensive CTLP and, most importantly, more people who are vulnerable to radicalisation would be identified.

Recommendation - By June 2020, the NPCC national Prevent lead and OSCT should undertake a national review of counter-terrorism local profiles (CTLP), to include governance, purpose, method of creation, structure and dissemination, and produce revised CTLP guidance.

All force actions:

Meaningful contributions should be made to the CTLP by local police (e.g. local tensions or hate crime data/mapping) before a risk assessment is carried out locally.

A partnership delivery plan should then be developed to ensure local threat information drives Prevent activity with all front-line officers, staff and partners.

Awareness raising should be supported by briefings to front-line colleagues to ensure understanding is not retained only by senior leaders

HQ actions:

CTP HQ – National Operations Centre commenced this process in autumn 2019. A working group, led by a Senior Analyst, has conducted scoping and police consultation and are about to move into consultation phase with partners. The review should conclude in June 2020.

10.6- In Hertfordshire the CTLP is owned and produced by ERSOU. CRCS capture tensions locally through tension monitoring, which are shared force wide at Chief Inspector level and into the Force Tasking Meeting. The briefing of PREVENT subjects are provided and briefed at CSP level by CRCS with explicit instruction / expectation in order to manage any threat, harm and risk and is updated weekly.

10.7- The CTLP is constantly reviewed by CTPHQ and ERSOU but as a regional document it is not Hertfordshire specific. A feedback mechanism is in place through a questionnaire that is circulated with the CTLP (see 6.6).

11. Performance management

11.1- The HMICFRS reviewed how forces measure the success of their Prevent activity identifying that many forces use quantitative data, such as changes in the number of referrals, the number of staff who have had training, or how quickly cases are handled. Some used case studies or reviews (for example, of people referred to Channel) to identify success measures.

11.2- No force had a coherent performance management framework for Prevent activity or could show how they used qualitative data to hold people to account for performance.

There is also no national framework or set of indicators to help police forces or other organisations understand the success of their Prevent work.

- 11.3- The HMICFRS looked at Prevent capability data provided by the NCTPHQ, where Prevent activity was broken down by regions, including case management data and outcomes. Its existence only came to light late in the inspection and is therefore not widely understood by forces.

Recommendation - By June 2020, the NPCC national Prevent lead and Office for Security and Counter-terrorism (OSCT) should develop performance measures that will help police forces assess their operational contributions to Prevent.

All forces actions:

All forces should develop a Prevent training plan for their staff which ensures a minimum level of capability to recognise risk.

This should be performance managed for both compliance and effectiveness.

To include existing staff, new recruits and promotion courses.

As a minimum, CT Heads are already able to share with their regional forces referral data at county level via the standalone Prevent Case Management Tracker database (PCMT). For example, a force can determine how many Prevent referrals its officers have made.

- 11.4- New recruits and staff on Promotion programmes receive training on Prevent.
- 11.5- The PCMT sits within ERSOU. Information from the PCMT is provided to CRCS who then manage the information as required. Details pertaining to Prevent statistics in the CTLP are provided at the Force Tasking and Co-Ordination groups quarterly.
- 11.6- There has been a lack of awareness on many aspects of Prevent both internally and externally. Internally processes are in place that address some of these issues via briefings slides to front line staff. Prevent and CTLP briefings are delivered through our Force Tasking Meeting quarterly. These briefings have been developed with ERSOU who share this data with CRCS on a weekly basis to ensure its relevance. In the last 18 months Prevent inputs have been provided during two sets of LPC Training days one linked to Hate Crime and the other CT specific.
- 11.7- The CTLP acts as a performance indicator and work is on-going to develop the CTLP so it become more relevant to performance including measures in addition to numerical data such as Lessons Learnt. By improving the CTLP and training the intention is that this will lead to better identification of those vulnerable to radicalisation which should impact referral rates with success measured through the greater number of interventions and some numerical data being used to identify areas / departments / partners in need of training. The information from Annex C in the report will be considered in this work.

Appendix 1

Counter Terrorism Policing an Inspection of the
Polices contribution to the Governments Prevent
programme



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Author Chief Inspector Nick Lillitou 0061 – 24th April 2020

MEETING	Strategic Executive Board
DATE	14/05/20
TITLE OF REPORTS	An inspection of the Metropolitan Police Services response to a review of its investigations into allegations of non-recent sexual abuse by prominent people. (The Henriques report)
SUBMITTED BY	Chief Inspector Nick Lillitou
PURPOSE OF REPORT	To inform SEB of the main findings and the National Recommendations detailed within the HMICFRS's report & to support compliance with s.55 Police Act 1996
DECISION(S) REQUIRED	None
FINANCIAL IMPLICATIONS	None arising from this report
RISK IMPLICATIONS	Any risk implications will be subject of assessment as the areas for improvement are worked through.
LEGAL IMPLICATIONS	s.55 Police Act 1996
EQUALITIES IMPACTS	Equality Act 2010
FREEDOM OF INFORMATION EXEMPTION SECTION IF APPLICABLE	Not applicable

1. Introduction

- 1.1- On 13th March 2020 Her Majesty's Inspectorate of Constabulary and Fire & Rescue Service (HMICFRS) published a report titled 'Metropolitan Police Service. An inspection of the Metropolitan Police Services response to a review of its investigations into allegations of non-recent sexual abuse by prominent people' (the 'Henriques report', see Appendix 1).
- 1.2- The independent investigation and report concerning the mistakes made was produced by retired High Court Judge Sir Richard Henriques and submitted to the Metropolitan Police Service (MPS) on 31st October 2016. It contained 25 recommendations.
- 1.3- HMICFRS were asked to comment on decision-making in investigations (including the concept of 'belief' in complainants at the point of recording crime allegations and thereafter), the use of search warrants, supervision and reviews of investigations and the provision of information to complainants, suspects, the media and other parties during criminal investigations. They were also asked to identify any wider lessons for the police service.

- 1.4- In the inspection the HMICFRS also took into account the Independent Office for Police Conduct (IOPC) findings and recommendations from their investigation (Operation Kentia) into the conduct of five officers who worked on those cases. The Kentia report was published on 7th October 2019 and contains 16 recommendations.
- 1.5- The Kentia report contains two recommendations for all forces. These are in relation to the Culture of belief (section 3) and media reports at the closure of investigations, especially around false allegations (section 6).
- 1.6- HMICFRS make a further 16 recommendations for the MPS and other agencies. Most of the recommendations from all the reports could be considered transferable.
- 1.7- There are no specific recommendations for Chief Officers or Hertfordshire in the HMICFRS report but they have added the following paragraph “We would also encourage chief constables of all police forces to use this report for the purposes of examining their training, guidance and policy material. This should be done with a view to seeking closer alignment of the material and reflecting the lessons from the Henriques report.”
- 1.8- The recommendations from all three reports are contained in Appendix 2. They are grouped together and cross referenced as best as possible. Where a recommendation crosses into two areas it is captured twice and the duplication indicated. I have indicated as to whether the MPS accepted the Henriques recommendation or not.
- 1.9- Further work is required to review the recommendations from all three reports which need to be considered in full as they interlink. The HMICFRS make 16 further recommendations based on the MPS progress against the Henriques recommendations. It is intended to develop an Action Plan to address those that are assessed as requiring further action in Hertfordshire.
- 1.10- The HMICFRS report covers the following areas.
 - 1- Introduction.
 - 2- Chronological summary of events.
 - 3- The Concept of belief.
 - 4- Victims.
 - 5- Reviews, decision making and record-keeping.
 - 6- False and Malicious allegations.
 - 7- Bail / Released Under Investigation and Voluntary Attendance.
 - 8- Search warrants.
 - 9- Media.

2. Chronological summary of events

- 2.1- In 2012, ITV broadcast a documentary alleging that the TV presenter Jimmy Savile had committed numerous sexual offences. Following this broadcast, there was a significant increase in the number of people making complaints of non-recent sexual abuse.
- 2.2- Carl Beech contacted the MPS, alleging that he was the victim of non-recent sexual abuse. The offences were alleged to have been committed in Wiltshire and the MPS referred the allegations to Wiltshire Police.

- 2.3- Because no living suspect could be identified, Wiltshire Police closed the investigation in May 2013. The detective constable who interviewed Beech expressed doubts about the credibility of his account.
- 2.4- Beech wrote and publicised a series of blogs detailing his alleged abuse, attracting the attention of a freelance investigative journalist in May 2014.
- 2.5- A month earlier in April 2014, a House of Commons select committee published the results of an inquiry into crime statistics and in November 2014 the HMICFRS (then HMIC) published findings from their report 'Crime Recording Making the Victim Count'.
- 2.6- They found widespread failures by the police to record a significant proportion of crime allegations. There were particular problems with the under-recording of allegations of violence and sexual offences. At the time, the under-recording rate nationally for sexual offences was 26 percent.
- 2.7- The HMIC made a number of recommendations. Their 11th recommendation was in relation to crime recording and contained the following line: 'Immediately, forces should ensure that **in crime-recording** "The presumption that the victim should always be **believed** is institutionalised"'.
- 2.8- In context the HMIC meant that 'belief' referred only to the purely administrative act of recording a crime, not the subsequent investigation. It was, however, misinterpreted.
- 2.9- By October 2014, Beech had made a series of allegations of physical and sexual assault by various men, including former Prime Minister the late Sir Edward Heath, former Home Secretary the late Lord Brittan, former Chief of the Defence Staff the late Lord Bramall, former MP Harvey Proctor and others to the MPS. He also alleged that three children had been murdered. The offences were alleged to have taken place during the 1970s and 1980s.
- 2.10- In 2012, a separate complainant alleged that Lord Brittan had raped her in 1967, investigated under Operation Vincent. In 2014, he was named in the press in connection with the latest allegation.
- 2.11- In January and April 2015, Beech provided the MPS with his final two allegations.
- 2.12- These were made at a time when the police service was under pressure to increase public confidence especially amongst victims and complainants involving sexual offences.
- 2.13- The MPS responded by launching Operation Midland. During 2015 and into 2016, they investigated Beech's allegations. The MPS's murder investigation team led the inquiry. The investigation was extensive, but flawed. The investigators were too ready to believe Beech, whose allegations were all false.
- 2.14- In March 2016, the investigation was discontinued due to lack of evidence and none of the suspects faced prosecution. By then, their names had been widely publicised along with the nature of the allegations against them and their reputations had been severely damaged and some had had their homes searched.

- 2.15- In February 2016, Sir Richard Henriques commenced an independent review of the MPS's handling of Operation Midland. He reviewed eight cases, including Midland and Vincente and on 31 October 2016 submitted his report to the MPS.
- 2.16- In November 2016, the MPS referred the conduct of five officers to the Independent Police Complaints Commission (now the Independent Office for Police Conduct IOPC). They investigated the matter under Operation Kentia.
- 2.17- The MPS published parts of the Henriques report and subsequently accepted, on a 'full' or 'part' basis, 19 of his 25 recommendations.
- 2.18- The MPS asked Northumbria Police to review Beech's allegations, to establish whether he had committed any offences when making his allegations. Operation Ruby, a criminal investigation into Beech followed, which secured evidence of false allegations.
- 2.19- Northumbria Police also executed a warrant at Beech's home address in Gloucestershire and seized various items, including computers. An examination of computers seized revealed indecent images of children. That particular matter was referred to Gloucestershire Constabulary for investigation.
- 2.20- In July 2019, Beech was convicted at Newcastle Crown Court of perverting the course of justice and fraud. He received a jail sentence of 18 years.
- 2.21- On 7th October 2019, the IOPC published its Operation Kentia report and made 16 recommendations in relation to processes and polices (detailed in Appendix 2).
- 2.22- The MPS put into place an advisory group to deal with the Henriques report led by a Deputy Commissioner. This group focused on the most urgent issues such as publication, protection of identities and officer conduct.
- 2.23- In January 2017 the advisory group held its final meeting, which produced a brief 'recommendation activity spreadsheet'. It comprised a list of the recommendations and the advisory group's response to them. The HMICFRS found the list lacked detail about who had allocated the responsibility for implementation of the recommendations and accountability.
- 2.24- The HMICFRS found the MPS were justifiably cautious in part with their response given that there was the criminal investigation and the trial of Beech on-going and the police misconduct investigation to consider. They are critical over their response by the MPS into learning and wider organisational lessons which in their view did not all need to be delayed and a lack of accountability and defined plan to manage this.
- 2.25- The MPS effectively had no formal action plan to implement the recommendations leading to an underwhelming approach during 2017, 2018 and most of 2019.
- 2.26- Also, in January 2017, the MPS and the College of Policing agreed to co-host a 'roundtable' meeting with various other agencies to develop a joint response to the recommendations. This took place in May 2017.
- 2.27- At the roundtable meeting and afterwards, the MPS, College of Policing, National Police Chiefs' Council (NPCC) and Crown Prosecution Service considered the Henriques recommendations, including if and how they should be implemented.

- 2.28- The HMICFRS recognised the work as valuable, providing evidence of implementation in relation to certain Henriques recommendations but note it has not yet resulted in sufficient changes in the MPS and throughout the wider police service.
- 2.29- Following the roundtable meeting the MPS updated its recommendation activity spreadsheet with the roundtable decisions. This was not updated until August 2019 and the roundtable never reconvened.
- 2.30- Between February 2018 and August 2019 three different Deputy Assistant Commissioners consecutively held the position of gold commander initially for Operation Midland alone and latterly for the operation and its connected matters, including the Henriques report.
- 2.31- The HMICFRS reviewed a summary of the gold group’s minutes. They were left with the impression the group saw no particular role for itself in overseeing implementation of the recommendations. The group’s discussion was heavily weighted towards restricting access to the report, rather than learning the lessons from it.
- 2.32- In August 2019, the MPS formed a senior management team called a diamond group and created Operation Larimar, to co-ordinate the organisational response to the Henriques and Kentia reports. The HMICFRS found the Larimar team has purposeful leadership and effective oversight from the Commissioner and the diamond group.
- 2.33- The Larimar team have commenced work to review the extent to which the Henriques recommendations have been implemented and identify where more work needs to be done.

3. The Concept of belief

- 3.1- The HMICFRS found the failings closely related to how the investigative team understood the concept or presumption of ‘belief’.
- 3.2- The complaint was made at a time when the HMIC had found widespread failures by the police to record crime. Sexual offences were under reported nationally by 26% meaning that this not only meant forces were not recording crime correctly but also links back to the confidence and belief in the victim. The report noted when taking their first steps towards seeking justice for the crimes they suffered at the hands of their abusers, many victims fell at the first hurdle. This is because they were not listened to, or officers failed to take them seriously.
- 3.3- When Beech made his complaint, the officers were too ready to accept his account as being correct and accurate and “believed” him. They did not investigate with an open mind-set.
- 3.4- In July 2019, the College of Policing reported that it had written to the Home Office, suggesting that two sentences be inserted into the national crime recording standard. Immediately after the sentence containing “The intention is that victims are believed”, the new sentences read: “This seeks to ensure that those reporting crimes will be treated with empathy and their allegations will be taken seriously. Any investigation which follows is then taken forward with an open mind to establish the truth.”
- 3.5- In their inspection the HMICFRS found that officers were prepared to test and challenge the veracity of complaints. This was particularly so in situations where there are claims and

counter-claims. However, some interviewees including a senior detective, said there was still confusion over the concept of belief.

- 3.6- In Hertfordshire, the Force Crime and Incident Registrar (FCIR) provides training on when to record a crime as per the current Home Office rules and what is inspected by the HMICFRS. The FCIR describe is able to detail the rule about the balance of probability test and believing the victim (number 12, in Appendix 2). This is a recording rule that does not dictate how the crime is investigated and what follows should be a proportionate investigation. Inputs are currently provided to new recruits, Force Communications room (FCR) staff, Investigation Management Unit (IMU) staff and Detective Sergeants (DS) on the DS courses. The Intervention and SNT have received inputs during the training days. A power point is used which is continually updated in line with any changes from the Home Office and legislation.
- 3.7- There is a recommendation for the Home Office in relation to concept of belief and a recommendation for the CoP and NPCC to ensure that training is provided and information made available to staff on crime counting rules after the Home Office clarify these (numbers 14 and 60 in Appendix 2).

4. Victims

- 4.1- HMICFRS reported that many of the Henriques recommendations related to the information provided to victims. This included how victims are treated and updated and they reviewed the training provided to officers and staff.
- 4.2- Henriques recommendation one was that throughout both the investigative and the judicial process those who make complaints should be referred to as 'complainants' and not as 'victims' by the MPS. The MPS rejected this saying it was a common term used and would have national implications.
- 4.3- The MPS response is unsurprising as in Hertfordshire the term "victim or injured party" is widely used. The crime system Athena also uses 'victim' as the heading and the Victims' Code of Practice has a formal definition of a victim within it. The HMICFRS recognise that both terms are appropriate depending on the context in which they are used.
- 4.4- The HMICFRS also focused on Henriques recommendation three which was accepted by the MPS. "In future, the public should be told that 'if you make a complaint we will treat it very seriously and investigate it thoroughly without fear or favour'".
- 4.5- The HMICFRS reviewed the lesson plans and training material used for basic crime training. This is a comprehensive PowerPoint presentation covering information such as conducting a needs assessment of victims and witnesses, restorative justice and special measures available for vulnerable or intimidated witnesses.
- 4.6- The HMICFRS found it did not say anything about the police investigating without fear or favour. In their view the information given to victims and the training given to officers, both fall short of making it clear to victims that the police will treat complaints seriously and investigate them thoroughly without fear or favour.
- 4.7- The HMICFRS make two recommendations in relation to Victims, one for the Ministry of Justice to deal more fully with the duties of the police to treat victims of crime seriously and that any investigation that follows must be carried out impartially. The 2nd relates to the

wording on the MPS website and in the leaflets for Victims of crime to deal more fully with the duties of the police to treat reports of crime seriously and investigate impartially.

4.8- I have consulted with the Victim Service Team and reviewed our public facing information on our website. There is comprehensive information available to the public. We reference the investigation processes, support services available and follow the national code of practice for supporting victims of crime. We do not explicitly mention or cover investigating impartially. These recommendations may also be suitable for the Victims and Witnesses board to consider and they will be raised them accordingly (numbers 22 & 62 in Appendix 2).

4.9- The training provided by VST focuses on Victims Services and Care as opposed to the investigation.

5. Reviews, decision making and record-keeping.

5.1- The MPS have established Operation Winter Key. Their remit is to investigate allegations of non-recent child sexual abuse, where the alleged abuse was committed before 2012.

5.2- HMICFRS identified inconsistent approaches by the MPS in relation to its use of recording systems, supervisor reviews and standards of investigations. They reviewed processes in BCUs (CSPs) and in Operation Winter Key who use the HOLMES system.

5.3- They mainly reviewed Winter Key cases and found that they could not assess the general proficiency in setting parameters or lines of enquiry due to inadequate record-keeping.

5.4- In a third of the cases assessed, the HMICFRS had to refer to comprehensive situation reports prepared for management meetings and closing reports to determine whether necessary, proportionate and justifiable decisions had been made. They note from what they saw they had been but, in some cases, the HMICFRS had difficulty in identifying who had actually been in overall charge of a case.

5.5- HMICFRS also looked at volume crime files, which were managed locally on BCUs. Senior officers told the HMICFRS that all decisions should be recorded on CRIS (MPS crime recording system) but that it was a judgment call about what to record. HMICFRS found some consistency in BCU-based safeguarding investigations where decisions were usually recorded on CRIS.

5.6- In some of the crime files (investigations) they found superficial updates that lacked any commentary on important issues such as the strengths and weaknesses of the evidence, lines of enquiry to be considered, timescales and deadlines. Safeguarding and response team supervisors told the HMICFRS they were not always able to give the level of supervision expected of them.

5.7- In May 2019, the MPS introduced a revised supervisory review policy giving guidance to all officers who investigate serious sexual assault via the safeguarding toolkit for both adults and/or child cases. An initial review will be completed by a Detective Sergeant within 3–5 days for all cases, and for high risk cases a Detective Inspector will review within 5 days and a Detective Chief Inspector within 10 days. Further reviews occur at 21 days and throughout the investigation.

- 5.8- HMICFRS make one recommendation in relation to Winter Keys processes and procedures and securing greater consistency in record keeping and the supervision of investigations and formal reviews (number 53 in Appendix 2).
- 5.9- Volume crime in Hertfordshire is managed through Athena. On a crime being recorded it is initially quality assured by the Investigation Management Unit (IMU). Once the crime is allocated to a CSP, a Detective Sergeant will review the crime and place initial investigation direction onto the crime before allocating it for investigation. The investigation officer's Sergeant should also review the crime within 72 hrs and thereafter every 7 days. Athena prompts formal reviews every 28 days. Where not completed by the line manager they are flagged to the second line manager. Victim updates are managed through Athena (Crime Management Guidance August 2019).
- 5.10- Detective Inspectors complete monthly dip-sampling (20 crimes) to ensure that investigations are up to date and being managed effectively, efficiently and the Victims Code is complied with. Feedback is provided to officers / staff. A spreadsheet is maintained by the LPC for audit purposes.
- 5.11- I have reviewed the Sexual Offences Investigation Team (SOIT) SOP. This has the initial supervisory review set within 24hrs, then at 7 days and where no suspect is identified by a DCI, at 28 days. Supervisory reviews are not covered in The Child Abuse and Historic Child Abuse SOPs but are reviewed in-line with Athena processes.
- 5.12- Workforce Development currently manages a course for Sergeants promoted under an "Acting" status which includes an oral presentation on supervisory responsibilities with crime investigation, taught by a Detective Sergeant. The input covers use of Athena, allocating Investigations, initial investigation and scene management, setting investigation plans, review processes, recording of decisions, VCOP, managing workloads, VCOP case direction and finalisation. I have asked the DS to incorporate this into a formal presentation that can be shared and include information about updating suspects and their legal advisors (please see section 7).
- 5.13- **Use of HOLMES** the HMICFRS reviewed the use of Home Office Large Major Enquiry System (HOLMES) by Winter Key staff. They have a single HOLMES account that contains 222 separate cases.
- 5.14- HMICFRS found this almost unmanageable and it would have been much easier to navigate cases on the CRIS system. They note that in the Kentia report the IOPC recognised that HOLMES can be resource-intensive and create backlogs. HMICFRS made a recommendation that the MPS review their process and determine the best solution for its needs (number 53 in Appendix 2).
- 5.15- The use of HOLMES across Bedfordshire, Cambridgeshire and Hertfordshire is reserved for most serious crime and managed through the Major Crime Unit. It would be unlikely Hertfordshire would use HOLMES in the same way as its use is described in Op Winter Key.

6. Training & False and Malicious allegations

- 6.1- HMICFRS found that training courses for detectives and sergeants on safeguarding generally covered the issues raised by the Henriques report but couldn't necessarily link these to lesson plans. Much of the guidance the HMICFRS reviewed on investigations generally was

undated and it was unclear whether it had been reviewed in the light of Operation Midland and the Henriques report.

- 6.2- HMICFRS referred to a 42-point plan, its purpose is to apply recommendations from Sir Richard Henriques' report and other relevant factors when interviewing complainants as an aid to decision-making, written by a Detective Chief Inspector (DCI) posted to Winter Key. It is divided into ten categories which include, the offence, witnesses, suspects, complainants, medical matters, exhibits, venues, the criminal justice process, professional standards considerations including any previous police or institutional failings and other relevant matters such as updating complainants and informing them of any decision to take no further action.
- 6.3- HMICFRS were told that that the problem of false and malicious complaints features in MPS training programmes and is subject of discussion during investigative interviewing courses for trainee detectives and during a supervisors' course for detective sergeants. Hertfordshire processes are being reviewed.
- 6.4- A senior investigating officer who previously worked on Operation Winter Key gives inspectors and senior investigating officers (SIOs) a one-hour oral presentation on relevant courses in relation to Op Midland. HMICFRS were concerned by informality in the MPS's approach to training following the Henriques report, concerning approaches, availability to other staff and consistency.
- 6.5- HMICFRS make three recommendations in respect of false allegations, one which relates to the training presentation provided in relation to Op Midland (6.5). The second relates to amending rape, serious sexual assault and other relevant policies to make it clearer that false allegations are made from time to time and the reasons why this may happen. The third relates to those falsely accused being treated as victims (15, 16, 61 in Appendix 2).
- 6.6- The Sexual Offences Investigation Team website details policies and procedures. There is a link for staff that takes you to the CoP website where further guidance and toolkits are found.
- 6.7- False reporting is covered in the Rape and Sexual Assault SOP but currently not to the extent that it would meet the current recommendations. It deals more with the process that will be followed as opposed to how the victim of a false allegation should be treated and was last updated in 2018. False allegations are not covered in The Child Abuse and Historic Child Abuse SOPs. These matters are being reviewed.
- 6.8- Whilst HMICFRS are prescriptive to a degree with these recommendations, consideration will be given for a single policy in relation to false allegations across the organisation.

7. Bail / Released Under Investigation and Voluntary Attendance

- 7.1- HMICFRS noted that the MPS prefer to take a discreet approach when dealing with high-profile suspects for non-recent offences using a process of voluntary attendance in compliance with the Police and Criminal Evidence Act 1984.
- 7.2- They found this to be a sensible approach but note the suspects must be co-operative and that consideration must be given to the safeguarding risks as in some cases an arrest may be

more appropriate, because it allows bail conditions to be imposed on the suspect when they are released from custody.

- 7.3- In Hertfordshire we use a process map which describes how Voluntary interviews should be recorded on Athena. Consideration is being given to a compliance audit / SOP review. The DCI from Victim Services Team is currently reviewing the Out of Custody interview processes and I have brought these recommendations to their attention.
- 7.4- HMICFRS commented about the timeliness of the investigations linked to providing relevant information to those who have voluntarily attended the police station and who are released under investigation (RUI).
- 7.5- When someone is released RUI, they are not given a potential timeframe for investigation unlike police bail. National Police Chiefs' Council (NPCC) guidance states that investigations where suspects have been released under investigation "must be conducted expeditiously to ensure all parties are not subject to long delays". A supervisor should then carry out a documented review of the investigation at least every 30 days.
- 7.6- The Henrique's report made a recommendation that the investigation time limit should be fixed and communicated to the suspect, which can be extended in the circumstances. The MPS did not accept this saying each case should be decided upon individually. The HMICFRS felt the MPS had misinterpreted the recommendation.
- 7.7- The HMICFRS made a number of recommendations in relation to these areas and bail (63, 64, 65 and 66 in Appendix 2).
- 7.8- They include, amending pre-charge and bail policy so information is provided to the suspect or the legal representative when a decision is made to take no further action in respect of one offence whilst an investigation continues into others; updating RUI processes and keeping suspects and solicitors updated with the case progression; and the final one is in relation to the training provided in relation to these recommendations.
- 7.9- Athena does not have an RUI function. We monitor and track this via a spreadsheet which is maintained by the Bail and Warrants Team located in the Intelligence unit. An update is circulated to Chief Inspectors and Detective Inspectors to enable them to monitor their own department's cases. The Officer in the Case provides the updates to the supervisors who should monitor this as part of the supervisor's reviews. There is no formal policy and the RUI form doesn't explain how suspects will be updated. This is being reviewed.
- 7.10- Hertfordshire currently has 2637 suspects within the database. Weekly updates on the numbers are circulated to the CSP Chief Inspectors and Detective Inspectors. The DCI with responsibility for this area is reviewing this with a view to further assurance that those on RUI are being managed effectively and appropriately.

8. Search Warrants

- 8.1- HMICFRS reviewed processes relating to search warrants. The Henriques report did not contain any recommendations relating to search warrants but identified multiple failings in their use during Op Midland. This included applying for search warrants without reasonable grounds, making inaccurate statements within the application process and impropriety in the conduct of the searches. The IPOC make a number of recommendations in respect of search warrants from the Op Kentia investigation.

- 8.2- At the time of the inspection the MPS indicated a lack of action because no formal recommendations were made in the Henriques report due to the on-going misconduct and criminal investigation. HMICFRS accepted the MPS needed to be cautious in their approach but this did not negate the need to review their approaches.
- 8.3- HMICFRS particularly focused on entries in the box 8 section of a PACE warrant application form. This is where officers should disclose any information that might undermine the application. Those interviewed reported having no training on this element and it was seen as a tick box process, or an issue for the magistrates.
- 8.4- I have consulted with the Operational Support Group (OSG) who complete the majority of warrants across Hertfordshire. They have written and published a presentation on Warrants available via the intranet. They have also provided training inputs to our Operation Scorpion staff and others. It is intended to build upon this to develop a policy or SOP in relation to search warrants.
- 8.5- HMICFRS make no formal recommendations concerning warrants but note is made of the recommendations from the Kentia report which are detailed in the Appendices, which will be considered for Hertfordshire's action plan.

9. Media

- 9.1- HMICFRS looked at the MPS response to recommendations made in the Henriques report in relation to media communications. The MPS did not fully accept all of the recommendations referencing that they follow guidance in the APP from CoP in relation to media releases.
- 9.2- These broadly relate to providing personal information about suspects prior to charge, link to policy and SOPs; and providing information once a decision has been taken to take no further action, and the specific wording set out by the policing minister in 2017 being incorporated into policy.
- 9.3- With regards to the management of persons who leak information and efforts being made to minimise this, both the MPS and HMICFRS both recognised the difficulty in identifying those who may leak such information.
- 9.4- HMICFRS were concerned that the MPS has no proactive capability to manage officer's activities. Dip-sampling individual use of ICT is no longer feasible and their ICT monitoring systems are inadequate. HMICFRS felt this, coupled with their high number of un-vetted staff, left the force in a vulnerable position.
- 9.5- Our Corporate Communications follow and apply the guidance from the College of Policing.
- 9.6- Our Professional Standards Department have proactive monitoring software in place and have recruited a full-time auditor (to start once Covid-19 restrictions are lifted) who will manage this.
- 9.7- The Herts intranet PSD page has briefings on relationships with media and information on inappropriate relationships and data misuse.

9.8- HMICFRS made three recommendations in relation to media, two for CoP and one to the MPS in relation to its media policy (22, 23 and 24 in Appendix 2).

Appendix	Details	
1	HMICFRS An inspection of the Metropolitan Police Services response to a review of its investigations into allegations of non-recent sexual abuse by prominent people. (The Henriques report)	 Henriques report.pdf
2	Overview of recommendations from HMICFRS, Henriques and Op Kentia reports	 HMICFRS summ of all recommen

Author Chief Inspector Nick Lillitou 24th April 2020.