

A report into the effectiveness of vetting and counter-corruption arrangements in Hertfordshire Constabulary

About us

His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) independently assesses the effectiveness and efficiency of police forces and fire and rescue services, in the public interest. In preparing our reports, we ask the questions the public would ask and publish the answers in an accessible form. We use our expertise to interpret the evidence and make recommendations for improvement.

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1. Introduction

Vetting, IT monitoring and counter-corruption: no graded judgment

In September 2021, HMICFRS changed the way it reports on how effectively police forces manage vetting and counter-corruption.

Previously, we inspected these areas as part of our [police effectiveness, efficiency and legitimacy \(PEEL\)](#) programme and provided our findings in the inspection report.

The new arrangements mean we will inspect each force separately to PEEL, although we will continue to use the same methods and produce a report containing our findings, graded judgments and any areas for improvement or causes of concern. The report will be accessible via a web link from the most recent force PEEL report.

In September 2021, we inspected Hertfordshire Constabulary to examine the effectiveness of its vetting processes, IT monitoring and counter-corruption. Senior officers in the force were briefed at the end of the inspection.

This report publishes our findings. As our inspection took place more than 12 months ago, we provide no graded judgment on this area. The report includes areas for improvement identified during the inspection, but we recognise that the force may have addressed some or all of them.

2. How effectively does the force vet its officers and staff?

We found that Hertfordshire Constabulary has a vetting management IT system, but this system didn't link to its human resources (HR) system. As a result, it was not possible to automate the notification process between the [force vetting unit \(FVU\)](#) and HR teams for individuals leaving, joining, or moving within the organisation. It had to be done manually, creating the potential for the vetting team to be unaware of the movement of personnel within the force and the HR team to be unaware of individuals' vetting clearance. We found that HR keeps the FVU updated about demands rising out of the Police Uplift Programme.

In February 2019, the force had 981 individuals with expired vetting. At the time of this inspection, we found the force had made some progress in reducing the number of people who hadn't been vetted to 102.

The force had not tracked non-police roles requiring vetting over the period. There are currently 175 staff in these roles with lapsed vetting, which means the force has a total of 279 individuals who do not have current vetting.

The force understands what level of vetting is required for each role. It has a list of [designated posts](#). But the force was not managing vetting at the enhanced clearance level effectively. It was difficult to identify the people in designated posts who had or didn't have the correct vetting, and the force provided contradictory data.

We found that some individuals' clearance at both lower-level recruit vetting and [management vetting](#) had expired. It suggests the force isn't able to manage its vetting workload. The force prioritised counterterrorism checks and security clearance vetting, which had a process for annual review. Beyond this, the force prioritised vetting using the date of expiry without considering people in posts requiring management vetting who didn't have the correct clearance. This is a risk for the force. It should prioritise unvetted staff based on the role they hold and the risk it poses to the organisation.

Hertfordshire Constabulary is part of a seven-force alliance which has trialled an automated system with the aim of reducing the manual checking of databases during the vetting process. However, it was not working effectively across the alliance at the time of our inspection and no solution had been identified.

The force has an independent appeal process for those recruits rejected at the vetting stage. The vetting IT system collects data on all nine protected characteristics and the FVU captures the reason for refusal. However, we saw no evidence of analysis of potential disproportionality. For example, the force doesn't analyse the proportion of rejections for applicants with a particular protected characteristic compared to a group without that characteristic. As a result, the force has no means of understanding the reasons for any disproportionality and therefore no action is being taken to address it. We have identified this as an area for improvement.

In our 2016 report [PEEL: Police legitimacy – An inspection of Hertfordshire Constabulary](#) we raised vetting as a cause of concern:

“Bedfordshire Police, together with the other forces in the alliance, namely Hertfordshire Constabulary and Cambridgeshire Constabulary, should ensure it complies with all aspects of the current national guidelines for vetting.”

Similarly, in our 2017 report [PEEL: Police legitimacy – An inspection of Hertfordshire Constabulary](#) we identified vetting as an area for improvement, stating:

“The force should ensure that it has a credible plan to comply with all aspects of the national vetting standards by December 2018, in line with HMICFRS' nationwide recommendation in 2016.”

Again, in our 2018/19 report [PEEL: Police effectiveness, efficiency and legitimacy – Hertfordshire Constabulary](#) we highlighted the lack of vetting clearance for some of the workforce as an area for improvement, stating:

“The force should ensure all staff have received at least the lowest level of vetting clearance for their roles and clear any backlogs, ensuring it is fully compliant with the national vetting guidelines.”

Furthermore, in 2019 our PEEL spotlight report [Shining a light on betrayal: Abuse of position for a sexual purpose](#) made a national recommendation stating:

“All forces that are not yet doing so should immediately comply with all elements of the national guidance on vetting. By July 2020, all forces that haven't yet done so should vet all personnel to the appropriate standard. Forces should also have a clear understanding of the level of vetting required for all posts, and the level of vetting held by all their officers and staff. Forces should make sure all personnel have been vetted to a high enough level for the posts they hold.”

While the force had previously shown some progress in meeting the recommendations above, we found it still needed to improve the management of its vetting and accordingly we identified this as an area for improvement.

Areas for improvement

- The force should improve how it manages the vetting of its workforce, to make sure that post holders have valid clearance for the role undertaken.
- The force should further develop its system to monitor and respond to disproportionality in its vetting decisions.

3. How effectively does the force protect the information and data it holds?

We found that Hertfordshire Constabulary has the ability to monitor all its IT systems as part of a tri-force system with Bedfordshire Police and Cambridgeshire Constabulary. IT monitoring of mobile devices had only been introduced a relatively short time before our inspection. There were 500 phones across the 3 forces that were not in use, but still in circulation. Hertfordshire Constabulary was working to resolve this.

The force recognises the risk associated with the use of [encrypted apps](#) on its devices. On 1 September 2021, it removed the right to use these apps and prohibited the use of work mobiles for personal matters.

During our review of 60 items of potential corruption intelligence, we saw effective use of the IT monitoring software.

4. How well does the force tackle potential corruption?

We found that Hertfordshire Constabulary had a counter-corruption [strategic threat assessment \(STA\)](#) dated March 2021. It was due for renewal in December 2021.

The STA and intelligence requirement included the force's priorities and emerging issues. It included details of how to identify officers and staff who may be susceptible to being corrupted. However, there was no evidence of profiles of individuals who might be vulnerable to corruption or people outside the force who might try to corrupt members of the workforce.

The force shares a redacted version of the STA with all employees. The force includes the four priorities in the training packages that the counter-corruption unit presented to the workforce.

The [control strategy](#) is based on the force's strategic priorities, intelligence requirements and educational priorities. In addition, the [professional standards department's 4Ps](#) approach (pursue, prepare, protect, prevent) includes a comprehensive action plan.

The force correctly categorised all 60 items of corruption intelligence we reviewed in line with the national [Authorised Professional Practice](#) on counter-corruption (intelligence). But we did not see any examples of proactive intelligence collection and the force was not using its IT monitoring capability to exploit all opportunities. The force was aware of this and had allocated additional resources, which should help it to be more effective in this area.

The force was developing working relationships with external agencies that support vulnerable people. This work continued through the pandemic, although engaging was more difficult due to the lack of face-to-face opportunities and changing priorities for organisations. This work has been revitalised through a dedicated corruption prevention team.

To increase awareness, the force has made [abuse of position for a sexual purpose](#) training mandatory and integrity is discussed during annual performance reviews. The workforce recognises that abuse of position for a sexual purpose is serious corruption.

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