

A report into the effectiveness of vetting and counter-corruption arrangements in South Wales Police

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: Good

In September 2021, HMICFRS changed the way it reports on how effectively 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, but we will continue to use the same methods of inspection. We will then produce a report for each force containing our findings, graded judgments and any areas for improvement or causes of concern. This report will be accessible via a web link from the most recent force PEEL report.

In April 2022, we inspected South Wales Police to examine the effectiveness of the force's vetting, IT monitoring and counter-corruption. We briefed senior personnel in the force at the end of the inspection.

This report sets out our findings. It includes an area for improvement identified at the time of the inspection, which we recognise the force may have already addressed.

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

South Wales Police has a vetting management IT system to effectively manage vetting, ensuring it periodically renews all vetting clearances for the workforce in line with the [Authorised Professional Practice](#) on vetting. The system flags renewals three months in advance. This lets the [force vetting unit \(FVU\)](#) plan and send relevant documents and reminders to the workforce. The force has an established escalation process if the renewal request isn't responded to within a month.

The FVU keeps a workforce list and updates it every six months. This lets it check all postholders have the right level of vetting for their role. Our dip-sampling confirmed that all officers and staff in post had the correct level of vetting at the time of our inspection.

The vetting manager carries out a review of an individual's vetting clearance in cases of [gross misconduct](#) where the individual isn't dismissed.

The force has effective processes in place to make sure staff notify the FVU through Operation Ninian of any change in circumstances. This is an integrity assurance process linked to the annual performance development reviews. The [National Police Counter Corruption Advisory Group](#) has shared this nationally as good practice.

The FVU has sufficient resources to meet current demand. It holds a twice-weekly meeting to discuss personnel, skills and training. The FVU keeps a spreadsheet of current cases and who they are allocated to. Vetting practitioners told us their workloads are manageable. When there is an increase in demand, the FVU works overtime or draws on additional resources from a 'staff bank'. For example, it has seconded temporary staff to deal with additional demand from the national programme to recruit more officers.

The human resources (HR) department gives the FVU annual returns detailing forecasted recruitment plans for the year ahead. It regularly updates the FVU on forthcoming recruitment campaigns as part of the national programme. This lets the vetting manager understand when demand may increase.

The force has an effective system to identify the right level of vetting for officers and staff. It has a list of [designated posts](#) that need enhanced [management vetting](#). At the time of our inspection, there were 161 police officer roles and 304 police staff roles. These were occupied by 770 police officers and 1,098 police staff. The FVU holds lists for recruit and management vetting, which contain the details of every individual and their vetting status. The force had recently reviewed and updated both lists and reconciles them every six months. The FVU doesn't have automatic links to HR and relies on manual checks to see who is in the designated post.

The strategic vetting and monitoring steering group is part of the [professional standards department](#) and is chaired by the police and crime commissioner's office. It meets every six months and monitors data on vetting decisions. We examined minutes of a recent meeting.

Although data on vetting decisions for different protected characteristics was presented at this meeting, we saw no evidence of analysis of potential disproportionality. For example, it doesn't analyse the proportion of rejections for applicants with a particular protected characteristic compared to the proportion of rejections for a control group without that characteristic. As a result, the force has no way of understanding the reasons for any disproportionality, so it isn't taking any action to address it.

The vetting manager told us the force was reviewing this process and seeking ways to improve its analysis.

In our 2018/19 report [PEEL: Police effectiveness, efficiency and legitimacy – An inspection of South Wales Police](#) we identified an area for improvement, stating:

“The force should monitor its vetting decisions to identify disparities and disproportionality (eg, BAME groups), and act to reduce them where appropriate.”

The force has previously shown some progress in this area, but we found it still needs to improve the management of its vetting. As a result, we have identified this as an area for improvement.

Area for improvement

The force should introduce a system to monitor and respond to disproportionality in its vetting decisions.

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

South Wales Police can monitor all its IT systems across handheld, mobile and desktop devices. It proactively checks call lists on mobile devices against numbers identified for vulnerable victims and [organised crime groups](#).

The force effectively uses targeted monitoring of individuals when intelligence indicates a higher risk of sexual misconduct. We saw good evidence of IT monitoring of people who were the subject of other corruption intelligence. The force has an IT monitoring policy with associated guidance for both passive and targeted monitoring. We reviewed 60 items of potential corruption intelligence and found effective use of the IT monitoring software.

The force recognises the risk associated with using [encrypted apps](#) on force devices, so it doesn't allow this.

Based on the demands and workload of the counter-corruption unit (CCU), the force has enough resources to use the monitoring software. It conceded it might need more resources as it fully integrates its IT monitoring capability. Although it has dedicated staff supporting the technology, the force acknowledged it would need extra resourcing to fully exploit IT monitoring for all counter-corruption threats.

4. How well does the force tackle potential corruption?

The force has a current counter-corruption [strategic threat assessment](#). This is supported by a [control strategy](#) and an action plan.

The force mostly categorises corruption intelligence in line with the national Authorised Professional Practice on counter-corruption (intelligence). But we found that the force tends to use the category of [abuse of position for a sexual purpose \(AoPSP\)](#) incorrectly. For example, it routinely records intelligence related to workplace relationships under abuse of position for a sexual purpose. This national category was intended for abuses of position towards the public. We encourage the force to make sure it uses this corruption category in relevant cases only.

We reviewed 60 corruption intelligence case files. In most cases, the CCU responded effectively. We saw examples of the force using its auditing capability to generate evidence in support of criminal and misconduct proceedings. The force used a range of investigative techniques to develop corruption intelligence.

The CCU has developed good working relationships with external organisations that support vulnerable people. It uses presentations to highlight potential warning signs and to encourage early reporting.

Members of the CCU have also given presentations to the workforce to raise awareness of AoPSP indicators, and to signpost reporting processes should concerns arise. The workforce recognises that AoPSP is serious corruption.

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