



**RESPONSE OF THE POLICE AND CRIME COMMISSIONER OF WILTSHIRE AND SWINDON TO THE HMICFRS REPORT SHINING A LIGHT ON BETRAYAL: ABUSE OF POSITION FOR A SEXUAL PURPOSE (SEPTEMBER 2019)**

**Chief Constable’s comments**

The Chief Constable of Wiltshire is committed to addressing the recommendations highlighted within the recent HMICFRS report. Wiltshire Police has now restructured the Professional Standards portfolio to include not only the Professional Standards Department (PSD) and Counter-Corruption Unit (CCU), but also the Personnel Security Vetting Unit (PSVU). This provides a strategic lead Superintendent with ownership for the delivery of the response to vetting, counter-corruption, police complaints and conduct.

<b>Recommendations</b>	<b>Wiltshire response</b>
<p>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.</p>	<p>Work is already underway to fully adopt the May 2019 College of Policing Authorised Professional Practice on Vetting, monitored through the Wiltshire Police Standards Board and has resulted in growth within the team providing an improved service. Wiltshire Police is now engaged with the South West Vetting Project Board, reviewing possible opportunities through greater consistency and cohesion across the five regional forces.</p>
<p>By April 2020, all forces that haven’t yet done so should:</p> <ul style="list-style-type: none"> <li>• record corruption using the national corruption categories;</li> <li>• produce a comprehensive annual counter-corruption strategic threat assessment, in line with the authorised professional practice; and</li> <li>• establish regular links between their counter-corruption units and those agencies and organisations who support vulnerable people.</li> <li>• Where forces are yet to implement an effective ICT monitoring system that allows them to monitor desktop and handheld</li> </ul>	<p>The Counter-Corruption Unit has developed a method to identify predatory behaviour, in order to deal with it in the most effective way. The force continues to publish the outcomes of misconduct hearings both internally to the workforce and externally to the public.</p> <p>Wiltshire Police sit on both the national and regional counter-corruption working groups, as such are working with other forces, National Police Chiefs’ Council and the Independent Office for Police Conduct to continually review and develop opportunities, including</p>

<p>devices, they should do so as soon as reasonably practicable.</p> <ul style="list-style-type: none"> <li>• By September 2020, all forces should have completed a review of their use of encrypted apps on police ICT systems to understand the risk they pose and to take any necessary steps to mitigate that risk.</li> </ul>	<p>development and installation of technical solutions to combat corruption.</p>
<p>By April 2020, all forces that haven't yet done so should make sure they have enough people with the right skills to look proactively for intelligence about those abusing their position for a sexual purpose, and to successfully complete their investigations into those identified.</p>	<p>The recommendations from the report have been populated into an improvement plan and delivery against these improvements will be overseen by the strategic lead.</p>

### **Police and Crime Commissioner's comments**

I welcome the "Abuse of position for a sexual purpose" report which provides detailed insights into this important theme. I appreciate that Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services has examined 29 forces in order to provide national recommendations on prevention, uncovering corruption and taking action.

The report highlights the importance of leadership to continuously strengthen an organisational culture that not only encourages ethical and lawful behaviour but also challenges any signs of inappropriate behaviour and supports continual improvement. I fully trust the Chief Constable Kier Prichard in his leadership and support his efforts to culturally embed the importance of the Code of Ethics as well as the national decision model which is used by officers and staff.

I and the Chief Constable have delivered 24 different police and staff presentations on past performance, current work and future plans while highlighting the importance of the NDM and introduced Wiltshire Police values, namely: transparency, impartiality, integrity, and public service. We both encourage police officers and staff to role model these values and ensure that they act professionally to represent Wiltshire Police based on these standards, especially in light of the new wave of recruitment.

In this regard, Wiltshire Police has incorporated "Abuse of Position for Sexual Purpose", a short video which was created by the NPCC and produced by South Yorkshire Police in the mandatory training under Curriculum – Wiltshire Police Induction to ensure that police officers and staff have full understanding of the importance of the correct conduct.

I recognise that even one instance of abuse of position for a sexual purpose can have a devastating impact on the reputation of our organisation and undermine trust in policing, therefore we need to ensure that we follow the national strategy provided by the National

Counter Corruption Advisory Group in order to follow its guidelines on prevention, intelligence, enforcement and engagement. As it has been pointed out by IPCC/ACPT report that abuse of position for a sexual purpose: “fundamentally betrays the trust that communities and individuals place in the police”.

My role as the Police and Crime Commissioner is to deliver my plan which clearly outlines putting victims, witnesses and communities at the heart of everything we do, therefore any sign of corrupt behaviour must be eradicated at its earliest stages. I understand the importance of vetting in this process, therefore I will be closely monitoring the progress of Wiltshire Police to fully adopt the May 2019 College of Policing Authorised Professional Practice on Vetting to ensure that Wiltshire Police is fully compliant with all elements of the national guidance on vetting by July 2020. The progress will be monitored by OPCC at the Wiltshire Strategic People Board and the Wiltshire Strategic Performance Board.

I will encourage Wiltshire Police staff and police officers to challenge any signs of inappropriate behaviour and to always do the right thing in the right way as our communities rightly expect.

Cc: Wendy Williams, HMI  
Chief Constable Kier Prichard, Wiltshire Constabulary