

**UNDER EMBARGO UNTIL 00.01 ON WEDNESDAY 22 JANUARY 2025**



# **A report into the effectiveness of integrity arrangements in North Yorkshire 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 to make communities safer. 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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# Introduction

## Background

When serving [police officers](#) and [police staff](#) are involved in [misconduct](#) or carry out criminal acts, it seriously reduces public trust and confidence in the police. It means the public are less likely to feel that [police personnel](#) behave in a lawful, ethical and fair manner. Public interest in police behaviour is high. The government and police service are increasing their focus on improving vetting, challenging misconduct and tackling corruption. We acknowledge this is increasing the demand placed on teams in [force vetting units \(FVUs\)](#), [professional standards departments \(PSDs\)](#) and [counter-corruption units](#). But this work is essential to making sure the right people join the police service, and all officers and staff continue to work with integrity. We must make sure those working to keep communities safe can be trusted to do so.

In autumn 2023, we paused our rolling inspection programme assessing the effectiveness of vetting and counter-corruption arrangements in police forces in England and Wales. We have now developed an integrity inspection programme that also examines force professional standards.

All police forces we inspect in the integrity programme will now receive separate graded judgments for vetting, professional standards and counter-corruption.

## Our judgments

Our inspection assessed the effectiveness of North Yorkshire Police's vetting, professional standards and counter-corruption arrangements. Our judgments are as follows:

Area	Grade
Vetting police officers and staff	Good
Upholding the standards of professional behaviour	Requires improvement
Tackling potential corruption	Requires improvement

We set out our detailed findings about things the force is doing well and where it should improve in the rest of this report.

At the end of our inspection, we briefed senior officers about our findings.

## **Terminology in this report**

Our report contains references to, among other things, 'national' definitions, priorities, policies, systems, responsibilities and processes.

In some instances, 'national' means applying to England or Wales, or England and Wales. In others, it means applying to England, Wales and Scotland, or the whole of the United Kingdom.

# Vetting police officers and staff

Good

North Yorkshire Police is good at vetting its police officers and staff.

## Vetting authorised professional practice

In 2021, the [College of Policing](#) published the [authorised professional practice \(APP\)](#) on vetting. The APP explains the role of vetting in assessing the suitability of people to serve as a police officer, [special constable](#) or member of staff. And it explains the vetting of non-police personnel. For each clearance level, it sets out the minimum checks that should be completed on the applicant, their family and associates. It also provides forces with examples of control measures which they could use to mitigate any risks.

The vetting APP applies to the police forces maintained for the police areas of England and Wales as defined in section 1 of the [Police Act 1996](#).

## Force vetting IT system

The FVU uses a vetting IT system that was introduced in 2010. The HR department uses a separate IT system. To overcome the absence of system integration the FVU and HR each have some access to the other's IT systems. The rest of the workforce can see a redacted record that provides the individual's name and vetting status only. This is particularly helpful for reception staff, who can check that contractors have force vetting before allowing them access to police sites.

The HR department has a one-year plan for police recruitment and shares this information with the FVU to help manage future demand. HR also provides the FVU with information about workforce changes. This helps the FVU keep track of internal moves, promotions and people leaving the force.

The FVU uses the vetting system to make sure all police personnel have the correct level of vetting for their role. It uses information collated from its own IT system to track vetting renewals in advance. This means the force has time to send application forms to individuals before a renewal is due.

The FVU clearly marks records in its IT system that contain adverse information.

## **Current vetting of the workforce**

North Yorkshire Police, as of 7 May 2024, had a total of 3,331 police officers, special constables, police staff and [police community support officers](#).

The force told us that all personnel had the correct level of vetting for their role. The force has sustained this position for several years. There is no one with expired vetting. There are four personnel currently not in the workplace. They all have current vetting. The FVU has a clear plan to make sure their vetting hasn't expired at the point they return to work.

## **Demand and workload**

The FVU manages reviews and applications on the vetting IT system. At the time of our inspection, the force told us it had 125 vetting applications and 157 reviews to process. The FVU prioritises this work by the due date and level of risk. The force vetting manager maintains daily oversight of the FVU workload.

The FVU and HR work together effectively to predict demand. This includes monitoring the progress of all recruitment and promotion processes and new vetting applications. If the force has a large intake of recruits, HR extends the time the FVU can take to complete recruitment vetting. The vetting unit can take ten weeks instead of the usual seven and a half weeks.

The vetting manager maintains a record of the predicted number of police officer recruits 12 months in advance. This means the FVU considers this recruitment information with future vetting renewal data to plan ahead and manage demand effectively.

North Yorkshire Police grants non-police personnel vetting (NPPV) clearance to contractors and volunteers. The force doesn't use the [national contractor vetting service](#) hosted by Warwickshire Police to carry out NPPV checks. The FVU told us it is responsible for the NPPV vetting of 1,258 people.

At the time of our inspection, the force told us that all NPPV cases managed by the FVU had current vetting. Departments that have responsibility for contractors inform the FVU when individuals are no longer in contract. The FVU then reviews their vetting status. If vetting expires or is removed, the FVU checks that the reception counter has revoked the individual's access to police premises. And it checks the IT department has removed access to computer systems.

The FVU doesn't renew vetting for contractors but instead completes a full re-vet. Departments that have responsibility for contractors inform the FVU when they are no longer in contract. The FVU then reviews their vetting status. The vetting manager carries out a regular reconciliation of NPPV postholders. This allows the point of contact enough time to complete vetting renewal documentation. As an additional measure, the vetting unit spot checks on-site contractors to make sure they have current vetting.

The force accepts contractors who have been vetted by another police force or the national contractor vetting service hosted by Warwickshire Police.

## **Designated posts**

Some police roles have access to more sensitive information and require a higher level of vetting known as [management vetting \(MV\)](#). The extent to which the role requires working with [vulnerable people](#) is also a factor for forces to consider when deciding if a role requires MV. The vetting APP states that forces should keep a record of all MV roles on a [designated posts](#) list.

The force told us it has designated 401 posts and maintains a list of these. The FVU told us that 1,980 individuals occupy these posts. When HR creates a new role, the vetting manager determines if MV is necessary. The force updates the designated posts list every month. The vetting manager carries out a monthly check between HR records and the designated posts list. This provides continuous assurance that everyone in a designated post has the right level of vetting.

Generally, the force doesn't allow individuals to take up a designated post before it grants MV clearance. The FVU prioritises MV applications to make sure that designated posts can be filled without delay. The force told us that everyone in a designated post had MV clearance.

We examined five MV files. In each case, the FVU had completed all the required minimum checks in line with the APP. And in each case the individual had the correct level of vetting for their post.

## **Transferees**

Vetting APP allows forces to accept vetting clearance from another force if it is no more than one year old. But many forces choose to vet officers and staff who are new to their force, even if they are transferring from another force with a current vetting clearance.



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North Yorkshire Police has chosen to vet to MV level all transferees and those who have left the service and applied to rejoin. The force uses this enhanced level as an additional safeguard. Furthermore, the FVU interviews all transferees. This is an extra measure to check their reasons for transferring are consistent with information on their application form. The FVU requests from all forces in which the individual has previously served a PSD complaint and conduct history, as well as any [intelligence](#) from the [anti-corruption unit \(ACU\)](#).

The force will on occasion accept a transferee with a live PSD case. Where a transferee has a live complaint or conduct investigation, the vetting manager reviews the case and refers it to the head of PSD. They consult the [appropriate authority](#) of the originating force. The force decides whether to allow the transfer according to the nature of the live complaint or [conduct matter](#).

Where North Yorkshire Police refuses vetting for a transferee, it informs the originating force outlining the reason for the refusal.

Where an officer intending to transfer from North Yorkshire Police fails vetting in the force to which they are applying, the FVU completes a partial re-vet. This is to examine the reason for refusal. The force will consider implementing risk mitigation measures or removing the individual's vetting clearance if necessary.

### Change of circumstances

The force has taken steps to improve the workforce's awareness of the obligation to report any changes in personal circumstances. This includes reporting significant changes to personal finances, and changes of name or marital status, for example. The force publishes a reminder on its intranet every six months. When the FVU gives a person vetting clearance it sends the individual a letter which also reminds them of their obligation to report any change in circumstances.

The force requires all its police personnel to complete an annual [integrity health check](#). This is part of the performance meetings that line supervisors hold throughout the year.

During our inspection, we found the FVU had received 711 change of circumstances notifications between 1 April 2023 and 31 March 2024. This is an increase of 504 notifications from the previous year.

When personnel report changes of circumstances to the FVU, it makes vetting enquiries to identify risks. It also decides if the change affects the person's vetting status. The FVU doesn't complete any initial checks when a change of address only is reported. However, North Yorkshire Police is one of two forces taking part in the [Police National Database \(PND\)](#) 'data wash' pilot. This means the force checks all officers and police staff employed, including their addresses, against the PND every month.

All the officers and staff we spoke to were aware they need to report certain changes in their personal circumstances.

## **Misconduct vetting review**

PSD informs the FVU of all [misconduct meeting](#) or [misconduct hearing](#) outcomes. The FVU told us it complies with the APP requirement to review a person's vetting status if misconduct proceedings result in reduction in rank, [written warning](#) or [final written warning](#).

During our inspection, we found an example of the [appropriate authority](#) referring a case to the vetting manager. The misconduct investigation had resulted in no further action. The vetting manager reviewed the officer's vetting clearance and decided to revoke it.

## **Vetting decisions**

Force vetting officers carry out all the relevant checks. They make recommendations regarding an individual's vetting clearance and record the supporting rationale. The deputy force vetting manager makes the final decision and records any additional rationale required.

The force routinely uses a decision-making template to record vetting decisions. During our inspection, we found the FVU consistently referred to the vetting APP in cases where it granted vetting clearance. The FVU uses the [national decision model](#) effectively to make vetting decisions. We found that vetting decision-makers consistently use a template to make clear decisions supported by thorough rationale.

## **Vetting interviews**

Force vetting officers regularly use interviews to clarify written responses in vetting applications. These interviews can be in person or on the telephone. The vetting officers keep a written record of their discussions and provide copies of the notes to the applicant. This is in line with the vetting APP. We were pleased to find a consistent approach to the additional interview for transferees, which we mentioned earlier. The force carries out this interview for every rank and role and every level of seniority. The force told us a vetting researcher interviewed the current chief constable when they applied to join the force.

## **Risk mitigation**

North Yorkshire Police uses risk mitigation in vetting clearance cases where there is adverse information, if necessary. The FVU and HR together consider restrictions on where the force can post someone. This is to make sure any such restriction is feasible for the applicant.

The FVU uses risk mitigation measures where the applicant has undischarged debt or other financial difficulties. The FVU then carries out reviews every three to six months. This is to make sure the applicant adheres to the conditions and manages their financial situation appropriately.

The FVU checks information with other departments before applying risk mitigation measures where there are third-party risks, such as notifiable associations. The FVU often manages such risks through restricting where people can be posted or by restricting home working. The FVU monitors and regularly reviews posting restrictions. The FVU informs the applicant and their supervisor of the restrictions.

North Yorkshire Police produces an annual counter-corruption [strategic threat assessment \(STA\)](#). This outlines the current threats facing the force. The vetting manager told us they were aware of this. The ACU shared the STA with FVU staff, and the FVU retains a copy. The vetting manager has regular meetings with the ACU to understand current risks.

## **Vetting appeals**

North Yorkshire Police has a process for hearing vetting appeals for internal candidates. A chief superintendent chairs the panel, and they are responsible for the final vetting appeal decision. Two superintendents and a legal representative support them. The head of the PSD and force vetting manager attend the vetting appeal meeting. And the force also invites the person appealing the vetting decision.

One of the requirements of the '[Vetting Code of Practice 2023](#)' is that "Decision-making in respect of vetting clearance should be separate from, and independent of, recruitment and other human resources processes." We were told a senior HR officer also attends the force's vetting appeal meetings. They are there in a purely advisory capacity and aren't part of any decision-making. The chair of the appeals panel is the final decision-maker.

The head of PSD handles all vetting appeals from external applicants, unless they were part of the original vetting decision. In which case the deputy chief constable is the appeal decision-maker.

## **Quality assurance**

North Yorkshire Police has a quality assurance process for vetting decision-making. The vetting manager told us they review 20 percent of the decisions made by their deputy every month.

The force told us that the [positive action](#) team inspector reviews any vetting rejections where the applicant has disclosed a [protected characteristic](#) on their vetting form.

The force also takes part in a regional vetting review process every month. The vetting manager told us they share five vetting cases with adverse information with another force in the region. We were pleased to see the force adopting this additional level of independent scrutiny to its vetting decision-making.

## **Disproportionality**

The APP states there is a risk that vetting has a disproportionate impact on underrepresented groups. Furthermore, it requires forces to monitor vetting applications, at all levels, against [protected characteristics](#) to understand whether there is any disproportionate impact on particular groups. Where disproportionality is identified, forces must take positive steps to address this.

The force analyses the outcomes of all vetting applications from people who declare one or more of the nine protected characteristics (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation).

The vetting manager produces this data every month for the PSD meeting. At the time of our inspection, the force reported that it hadn't identified any evidence of disproportionality in its vetting decisions.

However, the force has identified from this analysis it gets few applicants from [hard-to-reach communities](#). The force has asked its local elected policing body, the [Office for Policing, Fire, Crime and Commissioning \(OPFCC\)](#) and the positive action team to help it understand the reasons why.

## **Vetting file review**

With a vetting specialist from another force, we reviewed 24 vetting clearance decisions from the 3 years preceding our inspection. These files related to police personnel who had previously committed criminal offences or those that the force had other concerns about. The files included transferee and recruitment vetting decisions, and one MV case.

We agreed with 23 of the force's decisions. The only case we disagreed with involved a vetting applicant where the force identified third-party risks. The measures the vetting unit put in place for that case, in consultation with the ACU, weren't broad enough to fully mitigate the risks.

# Upholding the standards of professional behaviour

## Requires improvement

North Yorkshire Police requires improvement at upholding the standards of professional behaviour and addressing potential breaches.

### Promoting the standards of professional behaviour and integrating organisational learning within the workforce

**Area for improvement: The force needs to improve its processes for the collection, sharing and evaluation of organisational learning relating to the standards of professional behaviour**

The force doesn't have an effective process for the collection and sharing of professional standards related [organisational learning](#). The force has an established organisational learning board which meets every three months. The board discusses and progresses learning, but the force doesn't effectively track the associated actions. Learning from [professional standards department \(PSD\)](#) investigations doesn't form part of this process.

The force hasn't asked the PSD analyst to contribute or analyse data about organisational learning. It doesn't effectively add learning from individual cases to the PSD complaint and conduct IT system Centurion. We also found data quality issues within Centurion. So the force can't rely on the available data to improve its understanding of organisational learning.

Consequently, the force is missing opportunities to identify and act on trends in public dissatisfaction, address concerns, and make improvements.

Public confidence in the police depends on police officers and staff showing high standards of professional behaviour. It is important that everyone in a supervisor or manager role leads by example in maintaining those standards. They should do this by challenging poor behaviour in others and showing the standards in their own behaviour. Each force should create and develop a culture of organisational learning, which will help to raise the standards of professional behaviour in its workforce.

The standards of professional behaviour that police officers should follow are set out in two places. [Schedule 2 of the Police \(Conduct\) Regulations 2020](#) sets out the legally required standards. And the College of Policing's [Code of Ethics](#) lays out the professional standards expected from all police officers and staff. [The latest version of the Code of Ethics](#) was published in 2024.

### **Promoting high standards of professional behaviour**

North Yorkshire Police uses a variety of methods to reinforce organisational learning and the standards of professional behaviour.

The PSD trains all new officer recruits on the standards of professional behaviour at two points during their probation period. In the first week; and after 18 weeks in the role. It also trains special constables and volunteers on the standards expected of them.

The PSD provides sessions to supervisors on their [continuing professional development](#) training days. The force also briefs supervisors on professional standards expectations through the line managers and leadership programme.

The force circulates a weekly bulletin to the workforce which includes specific case examples to reinforce the expected standards. A recent example involved a police officer who was dismissed for speeding while on duty. The force uploads the bulletin on the intranet and distributes it by email.

The force also takes additional steps to improve the workforce's awareness of the expected standards. The PSD sends out a quarterly newsletter 'The Standard' which include the outcomes of [gross misconduct](#) hearings and learning from misconduct cases. The force displays posters in its buildings to reinforce ethical policing principles.

North Yorkshire Police publishes outcomes from gross misconduct hearings on its website, but only if it dismisses an individual.

Some officers and staff we spoke to said outcomes from gross misconduct hearings and misconduct meetings weren't well publicised. The interviewees said they either heard about outcomes 'on the grapevine' or learnt about them on non-police-related social media, which may not be accurate.

The force circulates [Independent Office for Police Conduct \(IOPC\)](#) 'Learning the Lessons' bulletins via the intranet. Line managers are responsible for briefing their teams on the identified lessons. Recent articles have included mental health and policing, closing licensed premises and relaying information to custody staff.

### **The workforce's understanding of the expected standards of professional behaviour**

The force checks that the workforce understands organisational learning and the expected standards of professional behaviour.

Field coaching officers who work in the business insight department identify gaps in the knowledge of the workforce around standards of behaviour. For example, they recently found that police officers and staff aren't clear on the differences between the standards of professional behaviour and the Code of Ethics. The PSD designed a force-wide poster campaign explaining this.

The deputy chief constable told us that the force reinforces the standards of professional behaviour throughout promotion processes. Interview questions help the force assess a candidate's understanding of the Code of Ethics and their use of the national decision model.

We found that officers and staff we spoke to had a reasonable understanding of the expected standards of behaviour, but a poor knowledge of organisational learning. Some individuals we spoke to said they didn't know where organisational learning was published.

### **Organisational learning**

North Yorkshire Police doesn't have an effective process for collecting and sharing organisational learning.

The deputy chief constable has overall responsibility for organisational learning. The force has an established organisational learning board which meets every three months. The head of business design and assurance chairs the meeting. It is made up of representatives from numerous departments. These include the heads of people services, the PSD and of learning and development. The Police Federation, Unison and other staff networks are also represented. The purpose of the meeting is to:

- gather learning (thematic focus);
- prioritise learning;
- implement learning;
- share learning; and
- assess learning.

The force records the actions raised at this meeting and who is responsible for completing them. We found the force had five open actions, but none of these had a target completion date. Only one of the five had been updated with progress. We found recent actions include dissemination of IOPC recommendations to the [force control room](#) and a review of the Code of Ethics training.

During our inspection, we found the force doesn't add organisational learning to the PSD complaint and conduct IT system Centurion. So the force isn't identifying and acting on trends in public dissatisfaction to promote improvements. We were told the PSD/ACU analyst, whose work we outline later in the report, hasn't been asked to contribute to or analyse any data around organisational learning.

## **Handling and investigating public complaints, conduct matters and other potential breaches of the standards of professional behaviour**

### **Area for improvement: The force needs to improve the capacity and capability of the professional standards department**

The force should make sure that:

- the structure and resources in the [professional standards department \(PSD\)](#) are appropriate to meet demand; and
- all [officers](#) and [staff](#) in the PSD are suitably trained.

We found the workload within the PSD to be unsustainable. In the year ending 31 March 2024, the volume of public complaints rose by 25 percent against the previous year. And the force told us the volume of conduct allegations rose by 93 percent. The force recognises this as an organisational risk and has recorded it on the PSD risk register.

We found a mixed level of experience and training within the PSD. Most police staff in investigative roles don't have sufficient training, specifically [professionalising investigations programme \(PIP\)](#) level 2 accreditation. This also means, at present, some police staff could be attending incidents that they aren't trained to deal with. The force has a development plan to address this.

### **Area for improvement: The force needs to improve the way it responds to complaints and conduct allegations**

This is in respect of the force's:

- initial handling of complaints and conduct allegations;
- management of the investigation of complaints and conduct allegations; and
- service to complainants.



The recording of complaints in the force wasn't compliant with the [Independent Office for Police Conduct's \(IOPC\) Statutory Guidance](#) to the police complaints system.

Statistics from the IOPC show the force took an average of 39 days from the point the complaint was made to reach a handling decision. Significant delays in the initial handling of complaints by the [Office for Policing, Fire, Crime and Commissioning \(OPFCC\)](#) seriously affected the force. Consequently, the force isn't fully aware of the nature of these complaints and any associated risk.

Additionally, we found six 'otherwise than by investigation' cases dealt with outside PSD in [basic command units \(BCUs\)](#) which included allegations of criminal behaviour and discrimination. The PSD should investigate cases of this nature. We also found three cases weren't referred to the IOPC when they should have been.

The force doesn't always investigate complaints and misconduct thoroughly and proportionately. And its management of investigations falls short of the standards required. Investigators didn't follow all lines of enquiry in some cases. Terms of reference were present in 11 out of 14 investigation cases examined, but none had an investigation plan. We saw little evidence of how, and to what extent, PSD supervisors provide direction to investigators on how to manage cases.

We identified this in our 2022 national report '[An inspection of vetting, misconduct and misogyny in the police service](#)'. The force still hasn't implemented this recommendation.

The PSD hasn't implemented a consistent approach for recording progress on the complaints and conduct IT system Centurion. This would help the force manage its cases.

The force has a documented process and structure for resolving cases otherwise than by investigation on BCUs, but this wasn't followed, or overseen by the PSD.

We found that most complaint cases the force dealt with otherwise than by investigation on BCUs were generally proportionate. But we found BCUs often failed to meet the needs of complainants. For example, BCUs gave complainants details of incorrect review bodies, didn't address complaints, didn't follow statutory guidance, and failed to provide rationale for decisions.

We considered the complainant didn't receive an acceptable level of service in 12 out of 17 cases handled otherwise than by investigation.

The force needs to establish better processes and improve communication between PSD and BCUs when complaints are handled otherwise than by investigation.

## **Capacity and capability in the professional standards department**

Public co-operation and support are an important part of helping the police to reduce crime and keep people safe. Police actions that are perceived to be unfair, disrespectful, discriminatory, or corrupt can damage public confidence and trust. Forces must make sure their workforce acts ethically and lawfully. And, if the force finds any problems with behavioural standards, it must show that it acts quickly and appropriately to address them. The force should have effective governance and the right organisational structure to allow the PSD to carry out its role. It should also allocate enough resources to the task, including appropriately trained and experienced personnel.

## Governance and capacity in the professional standards department

North Yorkshire Police has effective governance structures and processes in its PSD. But demand has a significant impact on how well the force manages public complaints.

All local policing bodies have certain duties in relation to the handling of complaints. The force works within a 'model 3' complaints structure overseen by the OPFCC. This means the OPFCC are responsible for:

- recording all complaints;
- making initial contact with complainants;
- keeping complainants and interested persons, for example the person making the allegation or witnesses, properly informed of the progress of the handling and outcome of their complaint;
- handling complaints outside [Schedule 3 to the Police Reform Act 2002](#); and
- carrying out complaint reviews where they are the relevant review body.

The force's responsibility in this model therefore covers the handling decision, possible investigation, and resolution of complaints.

Published IOPC statistics show the number of public complaints recorded under Schedule 3 to the Police Reform Act 2002 in England and Wales has increased in the last 12 months. The increase in North Yorkshire is significant. Between 1 April 2022 and 31 March 2023, the force received 269 complaints and in the year ending 31 March 2024 it received 337. This is an increase of 25 percent. The force told us it has also seen an increase in reported conduct matters. In the year ending 31 March 2023 it received 84 reports and in the year ending 31 March 2024 it received 162. This is an increase of 93 percent.

At the time of our inspection, the PSD recording system Centurion showed the force had 309 live complaints, and 128 live conduct matters. Centurion workflows show the number of investigations allocated to any one investigator in the PSD. We found most investigators were holding between 18 and 20 cases. We were also told staff and officers who join the PSD from investigative backgrounds often bring their existing workload with them.

We think the PSD's workload is unsustainable. The force recognises this level of demand as an organisational risk and has recorded it on the PSD risk register.

Additionally, at the time of our inspection, the OPFCC told us it had a backlog of 630 complaints outstanding and they receive approximately 120 new complaints each month. By its own estimation, the OPFCC can only process 90 complaints per month. The OPFCC is increasing resources and plans to recruit three new staff members by September 2024. It anticipates this will allow it to process approximately 225 complaints per month. The force should consider the significant impact this may well have on the future demand placed on the PSD.

#### Training and experience in the professional standards department

The PSD's workforce has a mixed level of experience and training.

We were told that a high turnover of investigators has left the department with varying levels of experience. Staff in the administration team possess a good level of knowledge. So they can guide newly appointed investigators through the department's processes.

All officers and police staff investigators have attended the College of Policing-endorsed PSD investigators course. This covers recent changes to the Police (Conduct) Regulations 2020.

In addition, the detective officers have also been trained to professionalising investigations programme (PIP) level 2. But some police staff investigators are still waiting to enrol in this programme. So they are undertaking their role without the right training or experience. The force has implemented a PIP2 development plan to support PIP accreditation for PSD staff investigators. However, as we mention later in this report, the ACU passes some corruption investigations to the PSD. The force should satisfy itself that members of the PSD who are allocated such cases have enough training.

The head of PSD has attended the national appropriate authority training course provided by the College of Policing. Other managers within PSD have also received training for them to carry out the appropriate authority role.

PSD officers and staff told us that the force provides limited training and accreditation. Apart from the initial investigators course, the only other development some receive is continuing professional development training every three months. But this was seen as having mixed success owing to the wide variation of knowledge and experience of the attendees.

We were told the force isn't providing any official training in respect of Centurion. PSD investigators used to receive basic training from the Centurion provider, but now members of the PSD provide training and guidance. So some PSD investigators had limited knowledge of Centurion case management software functionality. For instance, they don't know how to interrogate the system for previous complaint or conduct case history.

Currently only the detective sergeants are interview-trained to an advanced level. And we were told the training of nominated chairpersons for misconduct meetings isn't consistent or effective. It mostly comprises of a training video, sent via email.

PSD investigators work weekdays and weekends, but supervisors only work Monday to Friday. There is, therefore, no supervision on weekends. This means that non-PIP trained PSD staff could attend an incident over the weekend requiring PSD involvement, such as a death in police custody, without the support of PSD supervision.

### **Processes for the identification and initial handling of potential breaches of the standards of professional behaviour**

The UK Government introduced the [Police \(Conduct\) Regulations 2020](#) and the [Police \(Complaints and Misconduct\) Regulations 2020](#) to provide a more flexible approach to handling conduct matters and complaints about the police.

To promote a culture of learning in police forces, the new regulations include a [practice requiring improvement](#) process. This means that complaints or conduct matters that aren't potential misconduct or gross misconduct can be resolved quickly and informally. The intention is to give the best possible response to the complainant.

We assessed whether the force made sound decisions when handling complaints and conduct allegations. This included whether the force made any necessary referrals to the IOPC and complied with statutory requirements by making handling decisions in a timely manner.

#### **The initial handling of complaint and conduct matters**

Under the model 3 complaints structure, the OPFCC must assess whether complaints need to be formally recorded under Schedule 3 of the Police Reform Act 2002. This is in line with the [statutory guidance](#). Forces operating within this structure are then responsible for the handling and investigation of complaints once recorded.

All 43 police forces in England and Wales use the Centurion software to record complaints and conduct matters that are being handled under Schedule 3 of the Police Reform Act 2002.

#### Initial handling of public complaints

The OPFCC logs all public complaints made against North Yorkshire Police and decides whether they are suitable for [service recovery](#) or need to be recorded under Schedule 3. As previously mentioned in this report, the OPFCC is experiencing a significant backlog of complaints. IOPC data shows that the average time the force took to log a complaint in the year ending 31 March 2024 was 39 days.

Both the OPFCC and the force recognise they aren't fully aware of the nature and risks of these complaints.

This backlog hinders the force in making timely handling decisions. In the 20 complaint cases we reviewed, the force took more than 9 days to make a handling decision once the complaint was received from the OPFCC in 9 of these.

We reviewed 20 complaint cases, 17 of which were handled other than by investigation. We found 6 of the 17 cases handled in this way didn't comply with statutory guidance. These cases included allegations of criminal behaviour and discrimination. In the three remaining complaint cases that resulted in an investigation, we found the force's handling decision complied with statutory guidance. The force had documented and rationalised its decision in 19 out of 20 complaint cases.

We saw little in the way of records to indicate that the force updated the complainant with the handling decision, the rationale for it and with the progress of their complaint.

#### Initial handling of conduct matters

We learned that the PSD initially categorises all reports of conduct matters as 'miscellaneous' on Centurion, even where there is a clear indication of misconduct. It only re-categorises these cases as 'misconduct' once an appropriate authority has assessed the case or the IOPC has directed how it should be progressed. Where it is clear from the outset that a case is a [recordable conduct matter](#), the force should immediately record it as such, in line with statutory guidance.

In our case file review, we found that in general, the force appropriately identified and categorised allegations of misconduct.

We also found that the initial [severity assessments](#) were well documented and included an appropriate rationale. Sometimes, the force reviews the severity assessment in response to new evidence. But we saw limited evidence that an appropriate authority had reviewed these assessments as the cases progressed.

## Initial actions relating to complaint and conduct cases

The appropriate authority must refer a complaint or conduct matter to the IOPC when it includes certain types of allegations. These include a serious assault, a serious sexual offence or serious corruption. Or any criminal offence or behaviour which is liable to lead to disciplinary proceedings and which, in either case, is aggravated by discriminatory behaviour on the grounds of race, sex, religion or other protected characteristics.

We identified 5 out of 40 cases required a mandatory referral to the IOPC. The force had correctly identified and referred 2 of these. The force referred a further two cases nine days late.

In 6 of the 40 cases we examined, there was an allegation of police criminality. These included potential offences under the [Offences Against the Person Act 1861](#), [Misuse of Drugs Act 1971](#), [Computer Misuse Act 1990](#) and the [Data Protection Act 2018](#). We found that in all but one of these six cases the investigator acknowledged a potential crime.

It may, in some cases, be proportionate to deal with a matter as internal misconduct rather than as a crime. But the force should document a clear rationale for this decision. This wasn't present in the six cases we reviewed.

## **Accessibility of the public complaints system**

Forces in England and Wales have a statutory obligation to promote access to their complaints system, and to make sure the public can use it. The force should make sure that its complaints system is accessible to everyone. This includes people with protected characteristics and those from [hard-to-reach communities](#).

The OPFCC takes receipt of all public complaints in North Yorkshire. It accepts emails, telephone calls, national complaint forms and online complaints. The OPFCC itself promotes the different ways a member of the public can make a complaint.

The information the force makes available to the public about how to make a complaint is limited to its website. Restricting the information to this medium means that the public complaints systems is less accessible to groups with limited or no internet facilities. We aren't aware of any additional steps the force has taken to improve access to the complaints system.

The PSD provided training to basic command unit commanders and staff in the force control room to raise awareness of the complaints process. It also informed individuals in these roles of their responsibility to refer complaints to the OPFCC. We understand that the force recorded this and shared it force-wide to help others better understand the process.

Sometimes, public complainants require additional support during the complaints process. For example, where they have a disability such as a visual

impairment. In our case file review, we found that North Yorkshire Police had correctly identified the one instance where a complainant required additional support, and provided it.

Internally the force uses 'anonymous messenger' for reports of wrongdoing. Police personnel can also raise concerns directly with their line managers and the PSD. Individuals we spoke to were aware of these ways to report wrongdoing and were confident to use them.

## **Processes and governance for investigating and resolving public complaints and conduct matters**

### The standard of investigations

Investigations are an opportunity for the force to address the concerns of the public and the workforce. They help forces to learn and improve and, where necessary, to hold officers and staff accountable. They can be lengthy and have a major impact on everyone involved. So it is extremely important that they are both thorough and proportionate to the seriousness of the allegation or concern.

Of the conduct and complaint cases North Yorkshire Police investigated, we found most were proportionate investigations. However, in some cases investigators didn't identify or follow all available investigative opportunities, which may have resulted in a different outcome.

As we have already highlighted, there is a significant delay in receiving complaints from the OPFCC. This means the force may lose important evidence in a complaint investigation. We saw an example of an investigator who because of this delay couldn't access custody CCTV. This was to investigate a serious breach of the standards of professional behaviour relating to use of force, and authority, respect and courtesy.

When cases were resolved otherwise than by investigation, we found the force's approach was also generally proportionate.

Of the 14 complaint and conduct cases we reviewed that required investigation there were proportionate terms of reference in 11. But investigation plans weren't present in any.

We were told detective sergeants oversee the investigations within their team and have a monthly review to discuss them. However, we found a lack of auditable decision-making and supervisory oversight recorded on Centurion. This applied to almost all conduct and complaint cases we examined. In 11 out of 14 cases, supervision was mostly limited to the initial allocation of a suitable investigator and subsequent logistics around serving misconduct notices. There was no evidence of discussion or advice to the investigator to provide focus, identify relevant lines of enquiry or give direction.

Where the PSD had carried out an investigation, the appropriate authority had made a thorough final [severity assessment](#).

The force has a standardised way of using Centurion involving the use of a separate shared IT drive to retain almost all the documents generated by the PSD and those on BCUs. The PSD relies on its administration team to do most updates on Centurion. This is apart from the progress log, which is the investigator's responsibility. But investigators don't consistently update progress logs. Therefore, official records aren't always an accurate live reflection of ongoing cases. Improved use of Centurion would also allow PSD supervisors to better audit and quality assure investigations.

#### **Welfare support for personnel involved in complaint and conduct investigations**

Police forces need to make sure that they always consider the welfare of all police personnel involved in a professional standards investigation. This includes personnel accused of wrongdoing, those who have made allegations, and those investigating.

North Yorkshire Police considers the welfare of accused police personnel and of those investigating internal conduct allegations. But it has less robust arrangements to support those who have reported wrongdoing.

Line managers predominantly take on the role of welfare support for accused officers and staff. If there is a conflict of interest or objection, the accused can nominate an alternative. PSD provides a comprehensive guidance document for those in a welfare support role. It includes a summary of the relevant police regulations, a list of support agencies and a contact log. The force expects the welfare support officer to complete a separate 'risk assessment record' and share this with the PSD investigator every month. PSD should also share investigation updates with the accused officer every 28 days. The force now provides guidance on welfare management as part of 'first line leaders' training for sergeants and inspectors.

Officers and staff told us that welfare support focuses on the person or persons subject of the complaint or allegation. PSD investigators told us, beyond line managers and the HR department, there is no bespoke welfare support for those who have raised concerns about colleagues. This is an area which North Yorkshire Police can expand on to encourage and support reporters of wrongdoing.

PSD supervisors told us that they manage welfare within the PSD by way of formal and informal chats with their teams. The informal aspects appear to be on an irregular basis and depend on the working relationship between the supervisor and investigator. We were told more formal meetings occur every two months. But the force's expectation is that supervisors hold individual performance meetings monthly.

PSD investigators would benefit from a more structured, routine welfare discussion. This is particularly pertinent given the current high workloads experienced by the PSD.



## Suspension and restriction of members of the workforce

North Yorkshire Police has a clear policy on the suspension and restricted duties of police officers. At the time of our inspection, the force told us it had suspended 26 officers. Suspension will normally apply only to cases where the complaint or allegation is of a serious nature and is likely to result in a criminal conviction or a disciplinary outcome. In our case file review, we saw evidence of the force considering suspension or restricted duties in seven of the nine cases where it was appropriate. The deputy chief constable reviews each suspension and the PSD reviews cases where restricted duties have been applied each month.

We were told the PSD asks for the views of BCU commanders for proposed restricted duties of their officers and agrees between them alternative duties.

The head of HR makes the decision about the suspension of police staff. They then review these monthly. At the time of our inspection, the force told us it had suspended six members of staff.

The force uses [accelerated procedures](#) where appropriate. There were three accelerated hearings in the eight weeks before our visit, and potentially a further two in the near future.

## The service provided to complainants

An important part of creating and maintaining trust and confidence in policing is providing a good level of service to complainants.

Complainants can expect to be involved in an investigation from the outset. They are entitled to:

- receive a copy of the terms of reference for the investigation;
- provide their account of events; and
- receive regular, meaningful and timely updates.

We examined whether the force has effective processes in place to make sure it provides a good level of service to complainants.

We also examined the number of cases where complainants exercised their [right to review](#), and how many of these reviews were upheld by the IOPC or the OPFCC.

North Yorkshire Police didn't provide a good level of service to some complainants. We found where the force followed statutory guidance in relation to the handling decision, complainants were more likely to get a better standard of service overall. We also found that complainants whose case the force investigated received a better service than those whose case was dealt with otherwise than by investigation.

We found the PSD completed two out of three complaint investigations to an acceptable standard. There were 17 cases handled otherwise than by investigation. The force made a handling decision which fell outside statutory guidance in six of these. In five of the six, we considered the service provided to complainants to be below the required standard.

Cases dealt with otherwise than by investigation are sent to BCUs to be resolved. The PSD provides templates for completion to support those resolving these complaints. But BCUs don't always follow them. This often results in the force sending outcome letters with incomplete information to complainants. For example, no assessment of the service level provided by the force and the wrong review body being named. The PSD must then send multiple follow-up letters to resolve these errors which elongates the process. We found that in 12 out of 17 cases handled otherwise than by investigation and resolved on BCUs, the complainant didn't receive an acceptable standard of service.

In some cases, when complainants are dissatisfied with the outcome of an investigation, they can ask the IOPC for a review. Between 1 April 2023 and 31 March 2024, the IOPC finalised seven applications for a review of complaint cases that North Yorkshire Police had investigated. It found that four had an outcome that wasn't reasonable and proportionate.

During the same period, the IOPC carried out five reviews of complaints the constabulary had concluded otherwise than by investigation. It found that two cases had an outcome that wasn't reasonable and proportionate.

The office of the police, fire and crime commissioner finalised 33 complaint reviews during the same period. It found that the outcome wasn't reasonable and proportionate in 18 cases.

North Yorkshire Police should improve the way it handles and investigates complaint cases to provide a better service to complainants.

### **Information sharing**

It is important that the force gathers and shares adverse information about members of its workforce. This helps to make sure that it maintains professional standards and identifies and mitigates risks. In our inspection, we examined:

- whether the force can record adverse information;
- whether departments holding this information shared it appropriately within the force; and
- whether the force considered such information when making decisions about complaint and conduct matters.

## The recording and sharing of adverse information

North Yorkshire Police takes a 'one team' approach to assigning and co-ordinating tasks. The PSD chairs a daily management meeting which the ACU and the FVU attend. The PSD has regular contact with the ACU and routinely notifies the FVU of misconduct outcomes to initiate vetting reviews. The force has an effective [people intelligence meeting](#), which we describe later in this report.

The PSD doesn't routinely review all grievances and employment tribunals for misconduct. The PSD therefore relies on HR to identify and highlight misconduct within reported 'fairness at work' cases. These are police personnel who the force may not have trained in the IOPC guidelines for handling allegations of discrimination. However, within the case file review, we saw evidence of the force recording misconduct arising from grievances on two separate occasions.

The PSD has some interaction with BCUs about complaints and conduct matters. PSD inspectors attend a quarterly online command meeting. They share information and data relating to the number of public complaints and misconduct investigations generated within each BCU. However, when the BCUs manage otherwise than by investigation complaints, the PSD doesn't retain any oversight of them. In particular, the PSD is unaware of the appropriateness of the action taken by the BCU. Evidence from our case file review also suggested the force isn't accurately recording outcomes from these cases on Centurion. The force needs to establish better processes and improve communication between the PSD and BCUs when complaints are handled otherwise than by investigation.

There is a recently established analytical post within the PSD. This individual is responsible for supporting investigations. They are developing a 'Qlik' dashboard to identify patterns of behaviour and trends within the force's Centurion data. While this dashboard has the potential to greatly aid PSD decision-making and direct organisational learning, the force needs to improve the quality of the underlying data. For example, we were told 42 per cent of records on Centurion lack ethnicity data. Therefore, the analysis from which the PSD intends to prepare an action plan is fundamentally flawed. As this is a new post, it will take time for the analyst to develop and implement this work and for the force to realise the improvements.

## The consideration of relevant information

In our case file review, we found in 31 out of 40 complaint and conduct cases the PSD considered previous complaint and conduct history and made relevant enquiries with other departments. In conduct matters, the PSD did this consistently. The only case where the PSD didn't make these enquiries was following an immediate resignation by a member of police staff.

The PSD workforce told us they are unable to research other force systems to build a complete picture of an officer's behaviour. For example, they may be unaware of an individual's 'fairness at work' history.

Non-Schedule 3 complaints that the OPFCC deems appropriate for service recovery weren't recorded on an individual's Centurion record before January 2024. This means that the PSD may not be considering repeat low-level complaints about an individual. The OPFCC told us that from January 2024 it is now updating Centurion with this information.

We also found in our case file review there were two cases where the PSD hadn't recorded the outcome against the individual's record, even when this was known. These were cases handled otherwise than by investigation by line managers on BCUs. This means that an individual's Centurion record may not be accurate. This could affect PSD decision-making in the future.

## **Holding police officers and staff accountable for their behaviour**

### **Area for improvement: The force needs to understand and improve fairness and consistency within its professional standards department decision-making**

The force should make sure that it: understands potential disproportionality; and addresses any lack of fairness and consistency in the treatment of police officers and staff, in the investigation of complaints and [conduct matters](#).

The force doesn't carry out formal analysis to establish if there is any disproportionality (across the nine [protected characteristics](#)) within its investigations and decision-making.

We found some evidence that the force has taken steps to make sure its decision-making is fair and consistent. For instance, by participating in regional peer reviews of cases. But this falls short of the level of understanding required by the force to address any potential disproportionality.

To fully understand disproportionality in its [professional standards department](#) decision-making and the reasons for it, the force should carry out detailed analysis across the nine protected characteristics. It can then address any such disproportionality.

In our review of professional standards department and [anti-corruption unit](#) case files, we found that the force stops work on [misconduct](#) investigations of [police staff](#) if the individual resigns.

This creates a significant risk to the public of those individuals seeking to rejoin policing or other law enforcement agencies.

## **Consistency and fairness in decision-making**

Officers and staff must be held accountable in a fair and impartial way. And decision-making needs to be consistent. The force must make sure that its approach to complaints and conduct matters, and the resulting outcomes, are proportionate to the allegations and investigation findings.

Our case file review found that in most conduct cases PSD decision-making was proportionate and fair at both the initial assessment and final determination stages.

In complaint cases, not all initial handling decisions were proportionate, fair and consistent. But where they were, we found the outcome to also be fair and proportionate.

The force has increased the number of [appropriate authorities](#) to improve capacity in the PSD and better manage demand. There are five appropriate authorities. This helps to bring diversity of experience to the PSD. And it means that it can cover work if one of the appropriate authorities is unavailable or has a conflict of interest.

North Yorkshire Police takes part in a monthly regional peer review process. In this, local forces discuss and challenge the decision-making and severity assessments in two PSD cases. The force also intends to implement an internal appropriate authority peer review group, but it hasn't yet introduced this. We didn't find evidence of any other quality assurance of handling and investigative decisions for complaint and conduct cases in North Yorkshire Police.

Sometimes, a person under investigation for a complaint or misconduct allegation is criminally convicted or resigns before the conclusion of the misconduct process. In these circumstances, forces should consider still pursuing a misconduct outcome. Where there is a finding of gross misconduct and the individual is dismissed, the force should then place them on the [College of Policing barred list](#). The force told us its policy doesn't contain any provisions relating to the continuation of police staff cases in these circumstances. In our review of PSD and ACU case files, we found that North Yorkshire Police stops work on misconduct investigations of police staff if the individual resigns. These included cases of [stalking](#) and [harassment](#) and drugs misuse.

This creates a significant risk to the public of those individuals trying to rejoin policing and other law enforcement agencies. It also creates unfairness in the treatment of officers and staff. The force should address this.

The deputy chief constable is the decision-maker for suspension of police officers. The head of HR is the decision-maker for the suspension of police staff. This creates the potential for inconsistencies in the force's decision-making between officers and staff regarding suspensions and restricted duties.

Similarly, HR manages the use of [The Police Regulations 2003 Regulation 13](#), which applies during a police officer's probation. While we heard that the force appropriately applies Regulation 13, it may be missing opportunities to identify misconduct. This may lead to inconsistencies in the process and outcomes used to deal with similar behaviours.

The force has no established process for identifying disproportionality within PSD decision-making. This is something the force wants to improve, but as previously mentioned in this report, the data in Centurion needs attention first.

There are opportunities for the force's PSD to further work with staff associations and [independent advisory groups](#). This would help it to make sure its decision-making is proportionate, fair and consistent, and is perceived to be so. We were told an external panel is starting in July 2024 to bring independence and scrutiny to redacted vetting decisions and PSD cases.

# Tackling potential corruption

## Requires improvement

North Yorkshire Police requires improvement at tackling potential corruption and protecting the information it holds.

### Protecting the information the force holds

**Area for improvement: The force should make sure it has accurate records of who has each mobile device, so that it can hold users to account for any misuse**

The force doesn't have an established system of mobile device management. It can't attribute all mobile devices to individuals across the workforce.

We identified this in our 2022 national report '[An inspection of vetting, misconduct and misogyny in the police service](#)'. The force still hasn't implemented this recommendation.

### Lawful business and IT monitoring capability

Lawful business monitoring is a legitimate way for forces to monitor their information systems and methods of communication. By using lawful business monitoring, forces can identify unlawful access to police records, wrongful disclosure of police data, computer misuse and improper use of communication devices.

The counter-corruption (intelligence) APP (unpublished) gives guidance on IT monitoring and states that the use of monitoring and auditing software has significant prevention, intelligence gathering and enforcement advantages. For example, such systems allow the force to create alerts which immediately tell investigating officers when a specific file has been accessed or printed.

Most forces can use IT monitoring to gather corruption-related intelligence to help identify corrupt individuals. IT monitoring can be particularly useful when identifying irregular use of systems and use by police personnel who are of concern to the force. The force can use automated checks:

- when investigating individuals where there are integrity concerns;
- where mitigations are required because of notifiable associations;
- where the vetting process has raised concerns; and
- to make sure that access to force data is for a lawful policing purpose.

#### Use of IT monitoring software to tackle corruption

North Yorkshire Police can monitor most of its IT systems across mobile and desktop devices. The force has recently identified difficulties monitoring some force IT systems. It hasn't yet added this on to the force risk register. We would encourage North Yorkshire Police to do so. The ACU uses auditing to overcome these difficulties which goes some way to mitigating the potential risks.

The ACU proactively monitors activity on mobile and desktop devices. This helps identify potential misconduct including improper contact with vulnerable victims. We saw evidence of the ACU monitoring IT and auditing police personnel who were the subject of other corruption intelligence.

ACUs and IT departments should meet regularly to consider any new IT systems the force intends to introduce. This would make sure the force can monitor and audit these systems using its existing IT monitoring capability.

The ACU has an informal meeting with representatives from the IT department. However, the force doesn't keep a record of the meeting or any actions arising from it. The force may wish to formalise these meetings to make sure the two departments record and follow up any necessary actions. This would help North Yorkshire Police protect its systems and data from misuse.

#### **IT monitoring policy**

The force has a lawful business monitoring policy for monitoring and recording the workforce's communications. The policy allows the ACU to audit all force mobile phone data. In addition, it allows for proactive monitoring of IT systems to identify and tackle corruption.

The policy provides the workforce with clear guidance about their expectation of privacy when using force handheld and other mobile systems.



## **Digital device management**

Management of digital devices is important when protecting information. It is essential that forces have accurate records of who has each device so that it can hold the person accountable for its use. Police personnel must also understand the restrictions on the use of force-supplied devices. This is to make sure they aren't used for unauthorised purposes.

The force doesn't have an established system of mobile device management. And it can't attribute all mobile devices to individuals across the workforce. During our inspection, we found evidence that some devices are clearly allocated to the individual who is using them. But we were told of two cases where individuals used unattributed force mobile telephones to inappropriately contact vulnerable persons, including children.

## **Social media**

If forces allow the use of [encrypted applications](#) (apps) on force-issue mobile phones, it is very difficult to monitor what police personnel are sharing on these devices.

North Yorkshire Police has an established process to control which force devices can run encrypted apps. It allows the use of encrypted apps on work devices in limited cases. For example, individuals who are part of the 'rural taskforce' use an encrypted app to keep rural communities updated.

The force has a comprehensive social media policy which provides clear guidance to the workforce. It last reviewed the policy in April 2024. The digital communication development team owns all force social media accounts. Corporate communications must approve the accounts before use. It then monitors accounts to make sure the content complies with force policy.

North Yorkshire Police doesn't allow access to personal social media accounts using force IT systems.

Not all officers and staff we spoke to were aware of the force's social media policy. However, they showed a general awareness of the force's expectations of them regarding the use of social media and encrypted apps.

The PSD prevent officer has written a training package about the risks associated with social media misuse. The force plans to provide this training to the entire workforce in the next 12 months.

## Tackling potential corruption

### Area for improvement: The force should improve how it collects, assesses, develops and investigates counter-corruption intelligence

The force should make sure that:

- it produces an effective implementation plan with named people responsible for actions, aligned to its counter-corruption [strategic threat assessment](#) and [control strategy](#), and uses these to manage corruption threats effectively;
- its [anti-corruption unit \(ACU\)](#) has sufficient resources and suitably trained staff to meet demand, tackle corruption effectively and allow for proactive [intelligence](#) collection;
- it completes a [risk assessment](#) and has rigorous oversight arrangements for all intelligence concerning possible sexual misconduct by [officers](#) and [staff](#), to minimise any corruption risks;
- it strengthens its business interest monitoring procedures so that it monitors any conditions or refusals effectively, scrutinises applications to make sure any authorised interests are compatible with an individual's role in policing, and involves line managers where appropriate; and
- it maintains effective working relationships with external agencies and organisations that support [vulnerable people](#) to encourage reporting and safeguard potential victims.

These issues relate to an existing recommendation or area for improvement from either our 2022 national report '[An inspection of vetting, misconduct and misogyny in the police service](#)', or our report '[Police effectiveness, efficiency and legitimacy 2018/19: an inspection of North Yorkshire Police](#)' published in February 2020. In some cases, the same issues have been raised in both reports. It is disappointing to see that the force still hasn't addressed these issues.

The force doesn't have an implementation plan. The force should consider in detail each corruption threat it identifies in the strategic threat assessment and control strategy. And address them within set timescales. The force told us it isn't carrying out this work.

The current structure means the ACU has enough resources to develop potential corruption intelligence. But beyond this its capacity is limited. The ACU told us it doesn't have sufficient capacity to effectively implement the measures identified in its control strategy. Furthermore, staff told us the unit sometimes pauses proactive work because of high demand.

ACU staff develop corruption intelligence but don't retain cases beyond the [covert](#) investigation stage. The ACU often transfers corruption investigations to the [professional standards department \(PSD\)](#). Very few ACU staff have completed the [College of Policing](#) bronze counter-corruption course. As an alternative, the force is supporting its ACU intelligence development officers to attain accreditation under the College's intelligence professionalisation programme. The ACU manager and the PSD senior management team aren't accredited senior investigating officers. The force should satisfy itself that its current structure provides appropriate specialist expertise to corruption investigations.

These capacity gaps, coupled with the lack of specialist counter-corruption training, mean the ACU's current resources may not be sufficient to fully achieve its aims and objectives.

The force doesn't hold a central register of police personnel identified as posing a threat of sexual misconduct. These are officers and police staff who are subject of an allegation or intelligence relating to sexual misconduct or [abuse of position for a sexual purpose](#). The ACU also doesn't apply a risk assessment matrix to these individuals. This means the force may not have fully considered additional oversight or risk mitigation measures to monitor the behaviour of those who pose the greatest risk.

The force doesn't have an effective process to manage business interests.

The head of PSD is responsible for the authorisation of business interests. The PSD informs the applicant on authorisation but doesn't inform the applicant's line manager. Neither the PSD nor the line manager monitor any conditions applied to the business interest following its authorisation. Nor does the force monitor refused applications to make sure the applicant isn't carrying out the business interest regardless.

We found one example where the force had authorised a business interest which wasn't compatible with the individual's role in the police. This wasn't in line with the force policy, or the counter-corruption (prevention) APP, and should have been refused.

The force isn't providing enough scrutiny and oversight of these business interests. The ACU isn't involved in the force's business interest monitoring procedures. It should be.

The ACU in the force hasn't yet established working relationships to build trust with external agencies and organisations that support vulnerable people. So it also hasn't provided training to help them understand warning signs of the abuse of position for a sexual purpose. And the ACU hasn't told these organisations how to share such information with it. The force is missing opportunities to gather corruption-related intelligence regarding the sexual abuse of vulnerable people by police officers and staff.

## **Intelligence**

### Sources of corruption-related intelligence

North Yorkshire Police actively seeks corruption-related intelligence as a matter of routine. The ACU's IT monitoring system identifies potential misconduct and automatically alerts ACU staff if there is a hit. In addition to this, a member of ACU staff is allocated the task of proactively searching for corruption-related intelligence. The force uses a variety of tactics and systems to carry out this work. Each month, it also uses the PND to proactively check for any information which may identify unreported misconduct by its personnel, or undeclared issues that occurred in any other force area.

ACU staff told us the unit sometimes pauses proactive work because of high demand.

The force has an anonymous confidential reporting line. The force told us that between 1 January 2023 and 31 December 2023, it received 98 reports (77 in 2022 and 87 in 2021). The force also uses the national [Crimestoppers](#) integrity line. This resulted in 11 reports in 2023 (7 in 2022 and 2 in 2021).

We examined 60 corruption intelligence files. In 18 of these cases, we found police personnel directly reported corruption intelligence to the ACU. In 13 cases, a member of the public made the report. We found only one case that was the result of proactive intelligence work. Further sources of corruption-related intelligence included external agencies, reports from [covert human intelligence sources](#) and other forces.

### Police corruption categorisation

The counter-corruption (intelligence) APP lists 12 categories of corruption-related intelligence. Forces should use these categories when recording intelligence. In addition, forces can use this data to help them identify what their biggest corruption threats are.

Forces should make sure they accurately categorise all items of sexual misconduct intelligence. Sexual misconduct cases that don't meet the definition of [abuse of position for a sexual purpose \(APSP\)](#) because they don't involve the public shouldn't be recorded as such.

North Yorkshire Police correctly categorises all corruption-related intelligence in line with the counter-corruption (intelligence) APP.

## **Identifying corruption threats**

### Counter-corruption strategic threat assessment

The counter-corruption (intelligence) APP states that all forces should produce an annual counter-corruption STA, detailing the corruption threats they face.

North Yorkshire Police has a comprehensive current counter-corruption STA. It identifies the force's three main risks, which are:

- disclosure of information and misuse of force IT systems;
- violence against women and girls and sexual misconduct (including APSP); and
- organisational integrity (including notifiable associations and substance misuse).

The force publishes an edited version of the STA on its intranet to raise awareness across the workforce of the current corruption threats. During our inspection, we found FVU staff were aware of the corruption risks identified in the STA. This means vetting decision-makers know about the corruption threats facing the force.

#### Counter-corruption control strategy

North Yorkshire Police has produced a counter-corruption control strategy. The control strategy priorities mirror those identified in the STA. The force sets out the actions it is going to take to address the three main corruption threats. These are presented under the headings: intelligence, enforcement, prevention, communication, and engagement. The ACU manager, PSD chief inspector and the vetting manager have each been assigned a threat and the associated high-level actions.

#### Implementation plan

North Yorkshire Police doesn't have an implementation plan. The force should consider in detail each corruption threat it identifies in the STA and control strategy and address them within set timescales. The force told us it doesn't have sufficient capacity to carry out this work effectively. This is a risk. The force is missing opportunities to effectively tackle the corruption threats identified in its STA and may be putting the public at risk.

#### Exchanging information on people who may be a concern

Where forces have people intelligence meetings, they can help to identify officers and staff who may pose a corruption threat. The meetings bring together representatives from different parts of the force to exchange information on those who may be of concern. This can include, but isn't limited to, information relating to:

- management of unsatisfactory performance;
- sickness management and absenteeism;
- public complaints;
- corruption-related intelligence;
- internal misconduct cases;
- internet use;
- unusually high overtime and expenses;
- business interests;

- debt management problems;
- inappropriate use of force-issue credit cards; and
- excessive use of force phones, including text messages.

Police personnel discussed in these meetings can often appear in more than one category. Because relevant information is often held by several departments, corruption risks can easily be missed.

North Yorkshire Police has an established people intelligence meeting. The head of PSD chairs the meeting. Senior managers from PSD and ACU, BCU commanders, the vetting manager, and representatives from HR, finance and legal services attend this meeting. The force uses this meeting to discuss police officers and staff who are a concern and those who may pose a corruption threat. Those in attendance agree and assign actions to mitigate these risks. We observed a people intelligence meeting and found it to be effective.

Another meeting where potential corruption-related information could be shared is the PSD daily management meeting. This meeting discusses complaints and conduct that the public, workforce or partners have reported in the preceding 24 hours. The ACU manager and vetting manager attend. During our inspection, we found that the PSD doesn't keep a record of the actions raised at this meeting. It is therefore unclear whether allocated actions are completed or not. We encourage the force to address this.

#### Partnership working to identify potential corruption

The ACU hasn't developed or established working relationships to build trust with external agencies and organisations that support vulnerable people. The force is missing opportunities to gather corruption-related intelligence relating to the potential sexual abuse of vulnerable people by police officers and staff. And it is missing opportunities to safeguard potential victims.

Therefore, the ACU hasn't yet provided training on APSP to external agencies. For example, sex worker support services, drugs and alcohol and mental health charities. This would help these agencies to understand the warning signs and how to share this information with the ACU. The force recognises this as a gap and intends to provide such training to external agencies and organisations in the future.

During our file review we found no examples of intelligence reports of suspected corruption originating from partnership working.

We identified this as an area for improvement in our last inspection. Furthermore, this was a national recommendation in our [inspection of vetting, misconduct, and misogyny in the police service](#). The force told us that this inactivity was mainly due to lack of resources. But, given the length of time that has elapsed and the relative ease of addressing this issue, this isn't a reasonable explanation. The lack of activity and the absence of credible explanation are unacceptable.

## **Managing corruption threats**

### Intelligence development

In 56 of the 60 corruption intelligence files we reviewed, the ACU responded effectively and used a good variety of techniques to develop the intelligence. In each of these cases the ACU recorded an intelligence development plan endorsed by a supervisor.

In most cases, the ACU followed the plan and completed all reasonable lines of enquiry before the case was finalised and signed off as complete by the ACU supervisor. But we found the force had missed opportunities to develop intelligence and mitigate corruption risks in the remaining four cases. These cases included allegations of inappropriate associations, sexual misconduct and unlawful disclosure of information.

The force doesn't always refer potential corruption cases to the IOPC where appropriate. We found one APSP case that the force should have referred, but it hadn't.

### Corruption investigations

The ACU allocates cases to the PSD when it has developed the corruption intelligence and this reveals potential misconduct. Of the 60 intelligence files we reviewed, 16 resulted in an investigation. At the time of our inspection, six of these corruption cases were still being investigated. The force had missed investigative opportunities in three cases. And these three cases also had a lack of supervisory oversight.

As mentioned previously, North Yorkshire Police doesn't continue with a misconduct investigation where a member of police staff resigns before the case has been finalised. During our inspection, we found three corruption-related cases where this had happened. Of particular concern, in one of these cases, the individual had used their position in the police to contact vulnerable people multiple times. We strongly urge the force to review this approach.

### Risk management

If forces become aware of a police officer or member of staff who is potentially a perpetrator of APSP, they should assess the risk that individual poses. Forces tend to do this using a risk matrix. This prompts the assessor to consider all the circumstances and record the findings. Counter-corruption units then categorise each case as low, medium or high risk.

The types of behaviour that would trigger an assessment against the risk matrix include:

- inappropriate behaviour with or towards staff;
- inappropriate sexual comments to colleagues or to the public in general;

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- making a large number of calls or a sending a large number of texts, instant messages or emails to vulnerable people;
- sending emails or any messages of a sexual nature; and
- intelligence or information about inappropriate sexual behaviour off duty.

Individuals assessed by forces as presenting a medium or high risk should be subject to additional oversight.

North Yorkshire Police doesn't hold a central register of officers and staff identified as posing a threat of sexual misconduct. This refers to officers and police staff who are the subject of an allegation or intelligence relating to sexual misconduct or APSP. Nor does the ACU apply a risk assessment matrix to these individuals. So the force may not have fully considered additional oversight or risk mitigation measures to monitor the behaviour of those who pose the greatest risk. The force could use a risk matrix to further enhance the work of the people intelligence meeting.

### Capacity and capability to investigate corruption

The ACU is a small team comprising of experienced intelligence officers and a newly recruited analyst. Only one member of staff is an accredited PIP2 trained investigator. None of the ACU staff have completed the College of Policing bronze counter-corruption course. As an alternative, the force is supporting its ACU intelligence development officers to attain accreditation under the College's intelligence professionalisation programme. The current structure means the ACU has sufficient resources to develop potential corruption intelligence. But beyond this, its capacity is limited.

The ACU staff develop corruption intelligence but don't retain cases beyond the covert investigation stage. The ACU then decides whether to transfer the case to PSD for further investigation. This includes APSP cases, which often involve vulnerable victims and are likely to attract significant public interest. PSD staff aren't corruption specialists. The force should make sure that its current structure provides appropriate specialist expertise to these critical investigations.

The ACU manager and the PSD senior management team aren't accredited senior investigating officers. This lack of investigative capability may be hampering the force's ability to rigorously investigate police corruption. The force is aware of this and told us it is addressing this through training.

Furthermore, ACU staff told us that the unit sometimes pauses proactive work because of high demand.

These capacity limitations, coupled with the lack of specialist counter-corruption training, mean the ACU may not be able to fully achieve all its aims and objectives with its current resources.



### Specialist resources

The ACU has good working relationships with the [serious and organised crime unit](#) and ACU staff attend the force's organised crime meeting.

When required, the force can access resources for covert investigations through the [regional organised crime unit](#).

During our file review, we didn't identify any missed opportunities to use covert tactics to support corruption investigations.

### Policies designed to prevent corruption

Clear and concise corruption prevention policies help to guard against corrupt activity. But they can't guarantee to prevent corruption or, in themselves, stop corrupt practice. They provide guidance on how police officers and staff should behave. Policies should clearly state what is expected of personnel and what actions they should take to protect themselves and the force from corruption.

The counter-corruption (prevention) APP sets out what policies forces should have and gives guidance on their content. We examined policies on:

- notifiable associations;
- business interests; and
- gifts and hospitality.

Notifiable associations policies cover how the force should manage the risks related to officers and staff who may associate with, for example, criminals, private investigators or members of extremist groups. The policies should require officers and staff to disclose such associations.

Business interests policies should state when the force allows or forbids officers and staff to have other jobs, interests or activities. Policies should explain how the force will manage the risks that arise when this is allowed.

Gifts and hospitality policies should cover the circumstances in which police officers and staff should accept or reject offers of gifts or hospitality.

North Yorkshire Police's corruption prevention policies are comprehensive and reflect APP guidance. However, we found shortcomings in the way the force is applying some aspects of these policies.

### Notifiable associations

The force has a process to manage notifiable associations. Police personnel complete an online form, which their line manager sends to the ACU. The ACU maintains a notifiable association register and records the type of association, frequency of contact and level of criminality. The ACU grades the association based on the perceived level of risk.

The head of PSD determines which notifiable associations the ACU adds to the register and how frequently they should be reviewed. The head of PSD informs the officer or staff member's line manager of the decision so they can monitor any associated conditions. However, we found there is no current process to make sure that when a line manager changes, they pass this information on to their replacement. The force told us it is developing an IT data application which will allow line managers to access information for notifiable associations and other integrity matters for anyone they supervise.

The force audits IT systems in all notifiable association cases to identify any systems misuse and inappropriate access to police data. The ACU informs the vetting unit of all notifiable associations.

At the time of our inspection, the force told us it had recorded 171 notifiable associations. Of these, the force had assessed 30 as high-risk cases.

### Business interests

Although the force has a policy for business interests, its processes to manage them aren't effective.

The PSD oversees business interests and records all applications on Centurion. Police personnel submit business interest applications to the PSD using an online form. Line managers and departmental heads or BCU commanders must approve applications prior to submission. The PSD notifies the vetting unit and legal services of all business interest applications so they can comment on its suitability. The ACU isn't involved in the process.

The head of PSD is responsible for the authorisation of business interests. The PSD informs the applicant on authorisation but doesn't inform the applicant's line manager. Neither the PSD nor the line manager monitor any conditions applied to the business interest following its authorisation. Nor does the force monitor refused applications to make sure the applicant isn't carrying out the business interest regardless. A search of Centurion showed that over the previous three years, the head of PSD had refused five business interest applications.

We found one example where the force had authorised a business interest that should have been refused, as the work was undoubtedly conducted in licensed premises. The force had failed to identify that this activity wasn't compatible with a police role and should have been refused. Authorisation of this business interest wasn't in line with force policy. The counter-corruption (prevention) APP highlights the types of interest which are likely to be unacceptable. This includes working in or involvement with licensed premises.

We also found an example where the force had told an officer to complete a business interest application for a voluntary position. But the officer failed to comply and the force hadn't followed this up.

At the time of our inspection, the force had recorded 627 business interests. But, based on our inspection findings, the force isn't providing enough scrutiny and oversight of these business interests. The ACU isn't involved in the force's business interest monitoring procedures. It should be. Corruption-related intelligence held by the ACU should inform the business interest authorisation decision. The ACU should also monitor compliance with the policy.

### Gifts and hospitality

The force has an established system to manage gifts and hospitality.

The workforce must submit notifications about gifts and hospitality through an online form to the PSD. Police personnel must get approval from their line manager, departmental head or BCU commander to keep the gift or accept the hospitality.

The PSD records gifts and hospitality on the Centurion system. The force also records the details in a dedicated register on the force intranet, which is available to the workforce. This includes gifts and hospitality relating to the chief officer team. However, during our inspection we found the force hadn't kept this register up to date. We were told that this was due to the lack of capacity within the PSD. We would encourage the force to review this.

In the year ending 31 December 2022, the force recorded 62 gifts and hospitality applications. In the year ending 31 December 2023, it recorded 69 applications. And between 1 January 2024 and 5 July 2024, it had recorded 32. Since January 2023, the force has recorded seven occasions where a gift or hospitality has been refused.

Generally, we found officers and staff had a good understanding of these corruption prevention policies.

### Sexual misconduct

The force recognises APSP as serious corruption.

Of the 60 ACU corruption intelligence files we reviewed, 10 related to APSP. We found the force handled seven of these cases effectively. In one case there was a reasonable line of enquiry the force hadn't completed. We found a case of sexual misconduct linked to APSP, but the force hadn't identified this. Consequently, the force hadn't referred the case to the IOPC.

North Yorkshire Police has identified APSP as a priority in its counter-corruption STA. However, the force hasn't produced an implementation plan. As mentioned earlier, the ACU also hasn't developed or established working relationships with external agencies and organisations that support vulnerable people. The force is missing opportunities to gather corruption-related intelligence relating to the sexual abuse of vulnerable people by police personnel.

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The ACU prevent officer is providing APSP training to all police personnel. The force also uses the [College Learn](#) APSP training package provided by the College of Policing to train its workforce. The force told us this was mandatory training, and all personnel should have completed this by 30 June 2024. However, the force told us only 53 percent of all police personnel had completed it within the required time. The force should review this and assure itself that it has trained all staff.

North Yorkshire Police has adopted the [National Police Chiefs' Council](#) sexual harassment policy in line with our national recommendation.

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