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Office of the
**Police & Crime
Commissioner**
West Yorkshire

My Reference: OPCC/MBW/NF

Your Reference:

22 Nov 2019

Dear Home Secretary,

HMICFRS PEEL Spotlight report: Abuse of Position for a Sexual Purpose

I am writing in response to HMICFRS's recent PEEL spotlight report on abuse of position for sexual gain ('Shining a Light on Betrayal'). As ever, we are grateful for the observations and recommendations outlined in the report.

Whilst we know the great majority of West Yorkshire Police's officers and staff adhere to the guidance of the College of Policing's Code of Ethics in their dealings with victims, witnesses, suspects, and members of the public, West Yorkshire Police's Professional Standards Department (PSD) has sought to prevent the opportunity for cases of abuse of position to occur. Education and prevention work which I have been pleased to see WYP initiate includes:

- An abuse of position conference held in July 2018, in which more than 100 representatives from partner organisations attended our Carr Gate facility to find out what they can do to help the police identify cases of abuse by police officers and staff.
- Regular awareness raising campaign work: including PSD themed campaign weeks, video briefings on the WYP intranet, and externally facing campaigns to highlight to the public what constitutes unacceptable behaviour by members of the police service. The public facing campaign on abuse of position took place in March this year.
- The establishment of a WYP mandatory online learning resource on abuse of position for a sexual purpose or emotional relationship.
- A member of the PSD was interviewed on local radio to encourage the public to report any abuses of position by police officers or staff.
- This month has seen the second wave of awareness training for WYP officers and staff on standards of professional behaviour (authority, courtesy, and respect), and which has included promotion of PSD's videos on abuse of position offences.

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- WYP continues to implement the local action plan set against the 4 P's platform on the back of the National Strategy for Abuse of Position under CC Watson's lead for the NPCC.

Such awareness raising work is essential, as we can expect that abuse of position offences are under-reported, particularly where vulnerable people (who may not see themselves as a victim) are targeted.

Looking at the specific recommendations which the HMICFRS report has made, I would like to bring to your attention the following areas of activity which WYP has undertaken:

Improvements made to ensure accurate vetting of transferees: WYP has completed its retrospective vetting of all staff currently in WYP employment. PSD routinely vet transferees from other forces and the Vetting Team have had a track-record of rejecting a number of applicants.

The Professional Standards Directorate's Head of Vetting has been asked to sit on the College of Policing's working group looking to revise the Authorised Professional Practice on vetting to encompass HMICFRS's recommendations.

Threat assessment: the WYP counter corruption Strategic Threat Assessment is currently under review, with analytical support provided to ensure the correct prioritisation of those risks identified.

Adoption of national corruption categories: use of this classification is already applied to information discussed at the PSD's daily intelligence meetings.

Misuse of ICT: WYP has invested in CITSL software, which has the capability to monitor system data access by WYP staff. The CITSL software will assist in identifying computer misuse and, where required and appropriately authorised, can capture every keystroke of system users. Embedding this IT solution has been elevated to the Force Risk register as a red risk by the DCC, such is the importance of this task.

Engagement with organisations working with vulnerable people: The Counter Corruption Unit (CCU) has recruited a new Detective Sergeant who has extensive experience in managing Safeguarding investigations and engagement with partner agencies who support vulnerable victims.

WYP CCU have obtained a list of partner agencies from each of the West Yorkshire Police District Safeguarding Units, and are applying established principals in engaging directly with this partner support network by identifying SPOCs within each organisation for ongoing and regular contact.

Appropriate level of resource and skills in the WYP Counter-Corruption Unit: It has been recognised that the CCU for West Yorkshire Police was significantly smaller than that of our most similar forces. An uplift in staffing has been approved and are being appointed which will, effectively, double the staffing level by providing the following additional staff:- 1 x Detective Sergeant, 3 x Detective Constables, 1 x Advanced Investigative Officer, 2 x Corruption Intelligence Officers (researchers) and 1 x Analyst.

The CCU was previously co-located with the Reactive PSD teams, however, the CCU and Intelligence Unit has now moved to a separate building, with additional office space to

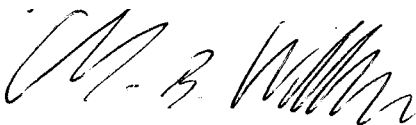
accommodate the uplift in staffing. A refreshed departmental plan will include prioritisation of proactive work into Abuse of Position.

Police employees occupy a position of public trust and it is vital that any abuse of position by police officers or staff is investigated appropriately. My office's quarterly survey of public opinion on the operation of the local police service tells me that West Yorkshire residents strongly believe that police officers and staff will treat them fairly and with respect. It is vital that we do not erode this hard-earned trust by failing to identify those individuals who fall short of the standards of conduct we expect from our law enforcers.

I am reassured that WYP have invested a significant effort in promoting important professional standards messages to all staff and officers. Recently, their work has also helped to secure the first guilty plea for a Misconduct in Public Office case involving a serving police officer who abused his position for sexual gain.

I will continue to review West Yorkshire Police's work in this area in the months ahead through the channels we have in place to hold the Chief Constable and WYP to account.

Yours sincerely



Mark Burns-Williamson
Police and Crime Commissioner for West Yorkshire

CC Chief Constable John Robins
West Yorkshire Police