

## **Response from the Police & Crime Commissioner of Devon and Cornwall to [A report into the effectiveness of integrity arrangements in Devon and Cornwall Police](#)**

One of my roles as PCC is to hold the Chief Constable to account for the service the police provide across Devon, Cornwall and the Isles of Scilly and, over the past year, I have publicly expressed my disappointment about how the police were dealing with complaints from the public, and I have already put in place measures to address these concerns.

The findings of this report from His Majesty's Inspectorate of Constabulary and Fire & Rescue Service (HMICFRS) which concludes that the force requires improvement in the way that they manage standards of professional behaviour including how they deal with complaints, tackle potential corruption, and the vetting of police officers and staff, are disappointing but not surprising, and correspond with my own findings.

HMICFRS also reported good areas of practice and, among these, it commended how the force proactively looks for corruption-related intelligence and has an established process for sharing some relevant adverse information between departments.

The measures that I have already put in place to support improvements include my authorisation of an extra £500,000 investment in how the police deal with complaints made by the public, and by putting in place stronger scrutiny and oversight processes. As part of this investment, a new a new position of Head of Public Service was created earlier this year in force, to lead a better service to members of the public who have felt the need to complain to the police.

I have also created a new Police Conduct Oversight Board, to provide me with oversight of police misconduct cases and public complaints, and I continue to use my Accountability Board to scrutinise the performance of the Professional Standards Department.

At my December Accountability Board I specifically scrutinised the action taken, and planned, by the force in response to the required improvements highlighted in this integrity inspection report. The force have made improvements in some areas, including reducing the backlog of complaints awaiting recording by 70 per cent since HMICFRS made their inspection in February, with complainants now being acknowledged within two weeks and investigations being undertaken more quickly.

However, it is clear that the force has some work still to do, particularly in relation to the proactive monitoring of encrypted devices, and the police's oversight of complaints outside of the Professional Standards Department.

I was however assured by Devon and Cornwall Police's plans to continue improvements, including provision of a new IT system to improve management of complaints and continued plans to implement the new Police (Vetting) Regulations 2025.

This led me to conclude that I am partly assured by the force's current performance, and assured by the force's plans to improve the effectiveness of integrity arrangements.

My full accountability statement for my December Accountability Board meeting can be [viewed on my website](#).

The inspectorate will continue to monitor the force's progress and I will also personally ensure this via weekly updates with Mr Vaughan, as well as through my scrutiny boards.

#### **Area for improvement 1:**

The force needs to improve how it identifies, explores, records and mitigates adverse information in vetting decisions.

The force should make sure that during the vetting process:

- it requires applicants to declare information about partners, including partners they aren't living with;
- it completes the appropriate checks when an applicant declares a partner;
- where necessary, it interviews applicants to clarify details provided in the vetting application and explores adverse information to help assess risk;
- when it identifies adverse information, it supports all vetting decisions (refusals, clearances and appeals) with a sufficiently detailed recorded rationale; and
- it consistently uses effective risk mitigation measures.

**Action planned/taken:** The force has now put in place a standard form for all clearances where adverse information has been recorded. A national decision-making model (NDM) based rationale is included on that form which includes any available mitigation or adverse information.

Adverse information is controlled and managed within the Force Vetting Unit (FVU) via a tasking system in Core Vet. This ensures reviews are effectively conducted and recorded with regularity.

Where a risk mitigation plan needs to be shared outside of the FVU, this is passed to the Force Vetting Manager or Vetting Supervisor to manage relationships with other departments and enable the hiring of managers to ensure that a risk mitigation plan is formulated. This is recorded on Core Vet and reviews are scheduled.

The vetting unit maintains the ability to place staff and officers on the agenda of the Professional Standards Department (PSD) People Intelligence Meeting (PIM). The PIM is held bi-monthly and enables a formal plan to be agreed and signed off by the Head of PSD. Where a risk is present and there is an urgent need for further consideration, the vetting unit raises concerns directly with the head of PSD for risk mitigation outside of the PIM.

Since March 2025, a quality assurance panel has also been in place to review recorded decisions in relation to clearances that have occurred with adverse information. This panel provides further reassurance and oversight of decisions made.

**Area for improvement 2:**

The force needs to assure the quality of vetting decisions.

**Action planned/taken:** The FVU attend the Regional Peer Review Panel alongside Welsh forces and Gloucestershire. This allows broader consultation on decision making and standard setting.

At a force level, a quality assurance panel has been in place since March 2025 which provides oversight of decisions made including applications cleared and declined which hold adverse information. This is maturing but is well attended and fully operational.

The Head of PSD undertakes a full review of four vetting cases per month to ensure senior leadership oversight and support.

Within the FVU the Vetting Supervisor has implemented a dip sampling regime where decisions and research are scrutinised to ensure standardisation. This dip sampling is business as usual and ensures improved standards and accuracy within the department.

**Area for improvement 3:**

The force needs to improve its timeliness in relation to its handling of public complaints.

**Action planned/taken:** The complaints that were awaiting recording at the time of this inspection have been isolated and worked on by a designated team, the current levels now sit at under 450.

DCPs ability to meet the current incoming demand is an ongoing challenge as the force currently receive approximately 200 complaints a month. DCP have implemented a focused resource for those complaints that are less complex (outside Schedule 3) resulting in a significant number of complaints being resolved in a timely way.

Going forward the force are now focussing on ways to support the team and changes in processes to ensure that we can meet the demand for the more complex complaints (Schedule 3).

**Area for improvement 4:**

The force needs to improve the way it handles and manages complaints and allegations of misconduct.

This is in respect of the force's:

- management of cases handled outside the professional standards department (PSD);
- referral of cases to the Independent Office for Police Conduct (IOPC);
- management and documentation of investigations; and
- retention of documents.

**Action planned/taken:** The use of the Crime Management Investigation Team (CMIT) to service complaints directly from the Force Control room is a risk that has been identified.

The force is currently working towards implementing the Single On-line Home form as the means of receiving complaints into the force which will ensure all complaints are received into PSD ensuring greater compliance with Statutory Guidance.

Our professional standards department have been working with the different command areas (BCUs) within the force to increase complaint handling knowledge as well as looking to provide limited access to Centurion.

Newly recruited team Leaders within PSD have attended a Sancus course and built good working relationships with Assessment Officers to increase their knowledge in respect of complaints requiring misconduct assessment or Independent Office for Police Conduct (IOPC) referral.

**Area for improvement 5:**

The force needs to improve its complaint and conduct decision-making processes.

The force needs to make sure that police personnel of appropriate seniority make decisions on how to handle complaints.

**Action planned/taken:** Benchmarking across other forces has taken place to understand how they are delivering decision making processes in line with Police Reform Act 2002, the Police (Complaints and Misconduct) Regulations 2020 and the Independent Office for Police Conduct statutory guidance.

All PSD decision makers including assessment and determination officers, and those in senior roles (including the Head of PSD) have attended the Head of PSD Course made

available by the College of Policing. To supplement this further, training has been provided through the provision of bespoke courses from an external service provider focused on the relevant regulations.

Assessment and determination officers remain under the line management of a Detective Inspector, they are appropriately aligned to an Inspector equivalent in line with national standards, ensuring PSD are compliant with the Police Conduct Regs 2020.

PSD are yet to realise a change in the seniority of decision makers, its likely this will be achieved before the next review period.

#### **Area for improvement 6:**

The force needs to improve its understanding of potential disproportionality in the handling, investigation and resolution of complaints and conduct matters.

**Action planned/taken:** The forces inspection found no disproportionality in decision making. However, inspectors wanted to understand how the force measures the proportionality of decisions.

Since March 2025 the force has implemented the following quality assurance processes to ensure it is consistently reviewing thresholds across the team, in line with national thresholds and home office statistics.

Assessment and determination decisions are dip sampled weekly by the PSD Detective Inspector and feedback provided in each case. A bi-weekly threshold meeting is held with the team and Chief Inspector to peer review cases and gauge thresholds. There is open dialogue between Appropriate Authority (AA) functions to discuss complexity and gauge opinion for any cases raised.

PSD have initiated and chair a quarterly regional quarterly assurance panel for the Southwest forces, which peer reviews cases enabling an on-going review of complex cases or cases with unusual circumstances to share learning.

The Detective Inspector and Head of PSD are members of the national AA forum which meets quarterly to share new updates (IOPC & COP) and discuss thematic issues. Their membership enables them to pose questions to other forces, sense check complex matters, and obtain guidance from those who may have experienced a similar issue.

The department de-briefs all misconduct hearings to review the end-to-end process and draw out the learning, this includes any feedback or learning from decision making.

The force has access to a range of subject matter experts who are actively used to assist with assessments whereby there is a specialism including use of force, taser, firearms and driver training. This aids the quality of assessments and grounds them in any relevant APP.

There is an on-going and detailed capture of performance data to 'temperature check' individual and departmental thresholds and compare against the annual Home Office published statistics. This data enables the department to track cases from initial assessment through to outcome, enabling decision makers to reflect on their decisions. It also enables the department to track the decisions and performance of individual staff.

All staff undertaking the AA role have received training to the National standard (HOPSD course). In addition, decision makers receive and review regular updates from the IOPC around national thematic (PPDA/APSP), best practice shared from other forces and changes in focus or process.

#### **Area for improvement 7:**

The force should make sure that:

- it can fully monitor all its computer systems, including mobile data, to proactively identify data breaches, protect the force's data and identify computer misuse;
- it has enough capacity to proactively monitor the use of all its computer systems, including mobile data, to protect the force's data and to identify misconduct, data breaches and computer misuse;
- the counter-corruption unit (CCU) and IT department consult regularly to make sure the CCU can effectively monitor, audit and investigate potential misuse of any IT systems the force is developing or procuring; and
- the CCU maintains an accurate record of every individual authorised to use encrypted applications (apps) on workforce devices and that it provides them with specific guidance on the standards of professional behaviour expected when using such apps.

**Action planned/taken:** PSD Counter Corruption Unit (CCU) can fully monitor its computer systems, including mobile data, to proactively identify data breaches, protect the force's data and identify computer misuse.

A specific concern was highlighted during inspection with regards to the intel portal allowing users to hover a cursor over a map and reveal the intelligence, which was not auditable. Since inspection the issue has been rectified by the system owners and ICT, removing the hovering function and replacing it with a click, providing a clear audit which is available to CCU.

It's recognised that our Counter Corruption Unit (CCU) needs the capacity to proactively monitor the use of all its computer systems, as a result, an uplift paper benchmarking demand and staffing against Avon and Somerset police is currently being considered.

CCU are also now a key stakeholder in the Emerging Technology and Data Assessment group which meets on a monthly basis. This forum provides the ability for the CCU and IT department to consult regularly and ensures the CCU can effectively monitor, audit and investigate potential misuse of any IT systems the force is developing or procuring.



The CCU maintains an accurate record of every individual authorised to use encrypted applications (apps) on workforce devices and it provides them with specific guidance on the standards of professional behaviour expected during use.

WhatsApp provides a specific challenge as it's an encrypted messaging platform that has no ability for auditing. Within Devon and Cornwall WhatsApp cannot be downloaded by a user without the relevant approvals from the Head of Department. Any approval is then recorded on the departmental Information Asset Register after which the application is deployed onto the user's mobile device. Within force there are currently 13 authorised WhatsApp groups.

#### **Area for improvement 8:**

The force should make sure that:

- it produces an effective counter-corruption strategic threat assessment (STA), associated control strategy and implementation plan with named police personnel given responsibility for actions, and uses them to manage corruption threats effectively; and
- its people intelligence meeting supports the regular and continuing exchange of corruption-related intelligence so that the force identifies police officers and police staff who may pose a corruption threat.

**Action planned/taken:** The CCU's dedicated IT systems auditor proactively monitors activity on mobile and desktop devices. This is supported by an artificial intelligence profiling tool in the force's IT monitoring software. Extending the CCU's capability within this area is limited by staffing and an uplift paper has been submitted for consideration.

The CCU has a Strategic assessment (STA) which builds upon the 2024/25 STA. The new 2025/26 STA is accompanied by a control strategy and implementation plan. The plan has allocated leads within the department and progress is tracked via Microsoft Lists and reported into the PSD Performance meeting which is held monthly.

The CCU holds a People Intelligence Board (PIB) which is used to discuss individuals within DCP. It operates on a cycle providing meaningful engagement and discussion and allows for nominations to be made from other departments as well as those highlighted by CCU data. The board alternates between overt and covert and is recorded with an action tracker and meeting notices. The meetings are chaired by the Head of PSD and are attended by a range of stakeholders.

#### **Area for improvement 9:**

The force should make sure that it strengthens its business interest monitoring procedures. It should make sure it proactively monitors compliance where it refuses an application or attaches conditions to the approval. The force should regularly review each approval.

**Action planned/taken:** A new terms of reference have been agreed between vetting and CCU departments. Decisions for all business interests or additional occupation applications are now decided on independently.

Careful consideration is given to the nature of each business interest as well as the current role and responsibility of the applicant. Vetting work closely with CCU and will inform them in the below three circumstances, allowing for further assessments to be made.

- 1) Non-compliance of conditions, either evidenced or suspected.
- 2) Review of refusals where adverse reputational matters or conflicts of compatibility are present. This includes where the applicant continued with the business interest despite being refused
- 3) Monitoring and reviewing including proactively when trigger points are hit.