



Mae'r ddogfen hon ar gael yn Gymraeg yn ogystal â Saesneg.

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Comisiynydd Heddlu a Throseddu Dyfed-Powys,
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Dyfed-Powys Police and Crime Commissioner,
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COMISIYNYDD
HEDDLU A THROSEDDU
DYFED-POWYS
POLICE AND CRIME
COMMISSIONER

Rt Hon Priti Patel
Home Secretary
2 Marsham Street
London
SW1P 4DF

26 November 2019

**Re: PEEL Spotlight Report Shining a light on betrayal
Abuse of position for a sexual purpose**

Dear Home Secretary

I write with regard to the above mentioned report, which is welcomed by myself and Chief Constable Mark Collins.

I can advise that all five recommendations contained within the report are subject of an action plan and are scrutinised at the relevant governance meetings, where progress is discussed and monitored and this progress is shared with HMICFRS. In addition, I have outlined below our considerations/response to each of the recommendations contained within the report.

Recommendation 1

All forces that are not yet doing so should immediately comply with all elements of the national guidance on vetting. By July 2020, all forces that haven't yet done so should vet all personnel to the appropriate standard. Forces should also have a clear understanding of the level of vetting required for all posts, and the level of vetting held by all their officers and staff. Forces should make sure all personnel have been vetted to a high enough level for the posts they hold.

[Dyfed Powys Police has recently created an additional vetting supervisors post to ensure that the force is discharging its duties around vetting. The Force understand the vetting required for each individual post within the organisation and prior to someone taking up a post the vetting has to have been completed.](#)

Recommendation 2

By April 2020, the NPCC lead for vetting and the College of Policing should devise a standardised list of information that should be shared between forces when someone transfers from one force to another. As a minimum, we would expect this to include information on performance, sickness, complaints, business interests, notifiable associations and any other corruption intelligence. All forces should then adopt this as soon as reasonably practicable.

[Dyfed Powys Police records corruption intelligence utilising the agreed National criteria and produces an annual strategic counter-corruption threat assessment.](#)

Rydym yn croesawu gohebiaeth yn y Gymraeg a'r Saesneg. Ni fydd gohebiaeth yn y Gymraeg neu'r Saesneg yn golygu oediad.

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Recommendation 3

By September 2020, the NPCC lead for counter corruption and the Home Office should work together with software suppliers to provide a solution to enable all forces to implement proactive ICT monitoring.

By September 2020, the NPCC should also work with forces to establish a standardised approach to using the information that ICT monitoring software provides.

Dyfed Powys Police has now started to proactively monitor IT systems to identify risks related to abuse of position for a sexual purpose. This was made possible through the introduction of software that can monitor mobile devices. Previously such activity has only taken place in response to intelligence received.

Recommendation 4

By April 2020, all forces that haven't yet done so should: • record corruption using the national corruption categories; • produce a comprehensive annual counter-corruption strategic threat assessment, in line with the authorised professional practice; and • establish regular links between their counter-corruption units and those agencies and organisations who support vulnerable people. Where forces are yet to implement an effective ICT monitoring system that allows them to monitor desktop and handheld devices, they should do so as soon as reasonably practicable.

By September 2020, all forces should have completed a review of their use of encrypted apps on police ICT systems to understand the risk they pose and to take any necessary steps to mitigate that risk.

Dyfed Powys Police did not have a current counter-corruption strategic threat assessment or control strategy at the time of your pre-inspection insight work in July 2018. However, by the time of your inspection fieldwork one had been prepared. Such an assessment, maintained over some years, should help the Force to identify the main corruption threats in a systematic manner. This should enable the force to identify trends and patterns in corruption as they develop. This should support the force to intervene to prevent corruption and/or reduce corruption threats more effectively.

As above, Dyfed Powys Police has now started to proactively monitor IT systems to identify risks related to abuse of position for a sexual purpose. This was made possible through the introduction of software that can monitor mobile devices. Previously such activity has only taken place in response to intelligence received.

Recommendation 5

By April 2020, all forces that haven't yet done so should make sure they have enough people with the right skills to look proactively for intelligence about those abusing their position for a sexual purpose, and to successfully complete their investigations into those identified.

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With the advent of the above technology the demand within the Anti-corruption unit is increasing. This is also down to the increasing confidence in staff utilising the confidential reporting system namely 'bad apple'. Prior to increasing the staffing levels within the unit, there needs to be a greater understanding of the actual demand being created by the advent of this technology.

I am encouraged by the changes made by Dyfed Powys Police in response to the recommendations for what forces should be doing to deal with abuse of position to prevent, detect and deal with this serious form of corruption.

Yours sincerely

Dafydd Llywelyn
Police & Crime Commissioner

Cc: HMI Wendy Williams

Chief Constable Mark Collins

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