

A report into the effectiveness of integrity arrangements in Thames Valley 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.

Contents

About us	i
Introduction	1
Vetting police officers and staff	3
Vetting authorised professional practice	3
Force vetting arrangements	4
Compliance with vetting APP	4
Capability and capacity	4
Demand and workload	5
Current vetting of the workforce	5
Designated posts	5
Transferees	6
Change of circumstances	6
Non-police personnel vetting	7
Vetting reviews	7
Vetting decisions	9
Vetting file review	10
Vetting appeals	10
Quality assurance	10
Disproportionality	11
Upholding the standards of professional behaviour	12
Promoting the standards of professional behaviour and integrating organisational learning within the workforce	12
Handling and investigating public complaints, conduct matters and other potential breaches of the standards of professional behaviour	15
Holding police officers and staff accountable for their behaviour	29

Tackling potential corruption	31
Preventing misuse of IT systems	31
Tackling potential corruption	34

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](#), [professional standards departments](#) 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

During our inspection, we assessed the effectiveness of Thames Valley Police’s vetting, professional standards and counter-corruption arrangements. At the end of our inspection, we briefed senior officers about our findings.

Our judgments are as follows:

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

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

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

Adequate

Thames Valley Police is adequate at vetting its [police officers](#) and [staff](#).

Area for improvement: The force should improve its vetting arrangements

The force should make sure that:

- all non-police personnel have the correct vetting clearance and all relevant checks are completed before they have access to police premises or systems; and
- it completes comprehensive post-[misconduct](#) reviews in all relevant cases and takes action to remove or downgrade clearance or to mitigate any additional risks identified.

Vetting authorised professional practice

In 2025, 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 process for non-police personnel (contractors, volunteers and people who work in organisations that share police premises). For each clearance level, it sets out the minimum checks that should be completed on the applicant, their family and associates. It also gives forces examples of strategies that they could use to mitigate any risks.

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

Force vetting arrangements

The [force vetting unit \(FVU\)](#) uses a vetting IT system that was introduced in 2009. The HR department uses a separate IT system. There is no integration between the two systems. To overcome this, the FVU has access to the HR system to check recruitment references. The FVU manually compares personnel data from both systems. This helps it keep the [designated post](#) list up to date. But the force told us that this could be time consuming. The FVU clearly marks records in its IT system that contain [adverse information](#).

Compliance with vetting APP

Since 2017, each version of the vetting APP has included the requirement for FVUs to ask for supervisor appraisals in some circumstances, such as when granting [management vetting](#) clearance.

During our inspection, Thames Valley Police told us that it had only complied with this requirement since March 2025. And the force told us that it had only started carrying out counter-terrorism checks on some non-police personnel vetting (NPPV) applications in June 2025. This has been an APP requirement since 2017.

Capability and capacity

The FVU has enough personnel to meet the demand it faces. The FVU increased its personnel numbers in 2023 from 23 to 32 full-time equivalent vetting officers. It also has four vetting managers, two vetting administrators and a head of vetting. The head of vetting reports to the head of the [professional standards departments \(PSD\)](#).

FVU personnel told us that they received a good level of support from the senior leadership team. The force tracks the FVU's progress in implementing the new APP at the chief constable's management team meeting held every six weeks. The FVU uses the force intranet and the PSD newsletter to keep the workforce informed. For example, the FVU has circulated guidance to staff and officers about their obligations to report changes in personal circumstances.

FVU personnel have regular training to keep their knowledge up to date. It includes training from the [counter-corruption unit \(CCU\)](#) and staff networks. Vetting managers also provide specific training to help FVU personnel meet the requirements of the new APP. During our inspection, the force told us that it was fully compliant with APP requirements.

Demand and 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. The head of vetting regularly attends the workforce planning meeting. This helps them to make sure FVU resources continue to match predicted demand.

Recruitment teams regularly meet with vetting managers to update them on recruitment campaigns. The FVU uses this information to manage and monitor predicted demand effectively. Vetting managers also have regular contact with departments across the force to manage the vetting of other individuals, such as contractors.

The FVU has a service level agreement with the force to complete all vetting applications within 30 days. The force told us that over the last 12 months it had done this. At the time of our inspection, the force had 803 vetting applications that it hadn't started. This is a manageable workload based on the size of the force and FVU resources.

Current vetting of the workforce

Thames Valley Police told us that as at 2 June 2025, it had a total of 10,121 police officers, special constables, police staff and [police community support officers](#).

The force told us that there were 39 people without the correct level of vetting for their role, including 12 with expired vetting (1 police officer and 11 police staff). The force had a good awareness of these cases. At the time of our inspection, all these applications were being progressed, although the oldest expired in 2016. The force told us that the FVU had inadvertently overlooked this application. The FVU assured us it was being processed.

Designated posts

Some police roles have access to more sensitive information and require a higher level of vetting known as management vetting. When deciding if a role needs this additional consideration, forces should also review the extent to which it requires working with [vulnerable people](#). The vetting APP states that forces should keep a record of all roles requiring management vetting or additional considerations on a [designated posts](#) list.

The force told us that it had designated 876 posts and maintained a list that was reviewed annually. The FVU reviewed the list shortly before our inspection. The force told us that it had 3,196 people in designated posts.

When the force is undertaking specific projects, project leads consult the FVU to make sure individuals comply with vetting conditions. For example, the FVU considers all geographical posting restrictions for personnel affected by force restructures.

However, the head of vetting told us that occasionally departmental heads or local command unit teams didn't inform the FVU of workforce moves. This doesn't comply with the APP.

At the time of our inspection, the force told us that 27 individuals hadn't yet been vetted to the higher level but were in designated posts. The FVU was progressing these applications.

We reviewed a selection of vetting files for individuals on the designated posts list. In each case, the FVU had completed all the required checks.

Transferees

The vetting APP states that all police personnel transferring between forces should complete a new vetting application form. Vetting clearance is required before the transfer is confirmed.

The FVU requests a PSD complaint and conduct history, as well as any CCU [intelligence](#), from all forces in which the individual has previously served. And, where required, it makes further enquiries directly with the relevant force. The force told us that it had vetted and recruited 21 transferees in the 12-month period before our inspection.

The force won't accept a transferee with a live complaint or conduct investigation without consulting the head of the PSD. The head of the PSD decides whether to allow the transfer, depending on the nature of the live matter.

If the force refuses vetting clearance for a transferee, it informs the originating force of the reason for the refusal.

Where an officer asking to transfer from Thames Valley Police fails vetting in the force to which they are applying, the FVU carries out a vetting review taking account of the reason for refusal. Thames Valley Police then considers implementing risk mitigation measures if required.

Change of circumstances

The force has taken steps to improve the workforce's awareness of the obligation to report any changes in personal circumstances. These include the PSD newsletter, messages from the chief constable and a PSD presentation to the workforce. When the FVU grants a vetting clearance, it sends the individual a vetting notice reminding them of this obligation. We found that the workforce generally had a good understanding of when to report changes in their personal circumstances.

When an individual updates their address on the HR IT system, it sends an automated email to the FVU. The FVU then sends the individual a change of circumstances form for them to complete and return. On receipt of a completed form, the FVU completes the relevant checks.

The FVU told us that between 1 April 2024 and 31 March 2025, it received 381 change of circumstances notifications. This is an increase of 113 notifications from the previous year. Given the size of the force, we would expect to see a higher number of notifications submitted to the FVU. We encourage the force to make sure all members of the workforce are aware of their obligation to report any changes of circumstance.

Non-police personnel vetting

Thames Valley Police grants NPPV clearance to contractors, volunteers and people who work in organisations that share police premises. The force uses the [national contractor vetting service](#) hosted by Warwickshire Police to vet some non-police personnel.

At the time of our inspection, data on the force vetting system showed that of 1,090 non-police personnel, 110 didn't have current vetting clearance. The force told us that it had started a project to bring all NPPV clearances up to date.

The force doesn't have an effective process to maintain accurate NPPV records. A vetting manager has responsibility for NPPV posts. They regularly attend meetings with NPPV staff sponsors. This helps to identify future demand. And it helps to make sure that those who no longer require NPPV clearance are removed from the vetting IT system.

However, the force told us that it allowed some NPPV contractors to start without completing full vetting checks, including counter-terrorism checks. It carries out a [risk assessment](#) in these cases, but this approach isn't acceptable. It places the public and the force at unnecessary risk.

Personnel responsible for contractors should inform the FVU when the individual is no longer in contract. They should make sure that access to systems and premises is removed when an individual no longer needs it. The FVU has no oversight of this process. It should.

Vetting reviews

The APP states that vetting clearances must be reviewed in certain circumstances, such as after a [misconduct](#) allegation. Depending on the circumstances, the force must complete a full vetting review or a review focusing on specific issues.

Annual integrity and vetting review

At the time of our inspection, Thames Valley Police didn't have a process for the workforce to complete an [annual integrity and vetting review](#) in line with the vetting APP. The force expected to have a procedure in place from September 2025. It told us that the annual performance development review that was in place at the time of our inspection included integrity questions, for example, about business interests and changes of circumstances.

Post-misconduct review

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

At the time of our inspection, the force told us that the FVU had carried out 89 reviews over the previous 3 years. We reviewed four of these files. We didn't agree with the FVU's decision in any of them. In each case, we found that the FVU hadn't taken any action to remove or downgrade clearance or to mitigate any additional risks identified.

The 2021 vetting APP didn't state what research forces should carry out for a post-misconduct review. The 2024 and 2025 vetting APPs clearly state that a review should be an assessment of all the information known about the individual. This includes the wider context of an individual's suitability to hold a vetting clearance.

At the time of our inspection, Thames Valley Police met the minimum requirements of the 2021 vetting APP for post-misconduct reviews. However, it should make sure it meets the more comprehensive requirements of the 2025 APP. This will reduce the likelihood of the FVU missing any wider risks the individual may present.

Other reviews

In some circumstances, Thames Valley Police will carry out a review of an individual's vetting clearance. These include when:

- an individual moves role;
- an individual with national security vetting requires an annual review;
- a new member of the workforce hasn't started within six months of vetting being completed; and
- an individual with NPPV clearance requires an annual review.

The force told us that between May 2022 and May 2023, it completed 522 reviews. Between May 2023 and May 2024, it completed 1,152 reviews. And between May 2024 and May 2025, it completed 2,176 reviews.

It is encouraging to see that the force has implemented additional reviews to help inform its decision-making. This helps to make sure that vetting clearances remain appropriate.

Vetting decisions

Vetting officers are responsible for carrying out relevant vetting checks. They make all clearance decisions. They record the rationale for their decisions and can give vetting clearance to people with adverse information.

FVU personnel routinely use a template to record vetting decisions. They consistently refer to the vetting APP and the [national decision model](#) when granting or declining vetting clearance. They support these decisions with a thorough rationale.

Vetting interviews

Forces should use vetting interviews in certain circumstances. These can be:

- exploratory vetting interviews to clarify written responses in vetting applications; or
- withdrawal assessment interviews as part of the [Police \(Vetting\) Regulations 2025](#).

Vetting officers regularly use exploratory 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.

At the time of our inspection, Thames Valley Police was developing bespoke interview training for FVU personnel to improve their skills and confidence.

Risk mitigation

Thames Valley Police regularly uses risk mitigation strategies to support its vetting decisions. For example, the FVU carries out regular financial reviews as a risk mitigation measure when an applicant has undischarged debt or other financial difficulties. It makes sure the individual complies with any conditions the force imposes and that they manage their financial situation appropriately.

The FVU is responsible for [notifiable associations](#) and business interests. We discuss the force's arrangements for managing them in [our section on 'Managing corruption threats'](#). As a risk mitigation measure, the FVU will regularly audit an individual's access to IT systems when they have granted clearance to an applicant with a third-party risk. This is to make sure that the individual isn't misusing force systems to carry out checks on the notifiable associations.

The FVU, in consultation with HR, also considers restrictions on where an individual can be posted to help mitigate risks. HR places a marker on its IT system to help make sure an individual isn't posted to a restricted area. The FVU reviewed all posting restrictions as part of a recent force restructure.

We found one case where the force had posted an individual to a location despite restrictions. The FVU was unaware of this case. The force should satisfy itself that it applies all geographical posting restrictions.

Thames Valley Police produces an annual counter-corruption [strategic threat assessment](#). This sets out the current threats facing the force. FVU personnel told us that they were aware of these threats. The CCU shares the strategic threat assessment with FVU personnel in line with the APP. And the FVU retains a copy. The head of vetting has regular meetings with the CCU to understand the force's current corruption risks.

Vetting file review

We reviewed 38 vetting clearance decisions from the preceding 3 years with a vetting specialist from another force. These files related to police officers and staff who had previously committed criminal offences or those that the force had identified other adverse information about. The files included:

- initial [recruitment vetting](#) decisions, both granted and declined;
- transferee vetting decisions; and
- post-misconduct review decisions.

We agreed with all but four of the force's decisions. These related to post-misconduct reviews. Generally, the vetting decisions we reviewed were well-documented with robust and detailed rationale that consistently referenced the relevant APP.

Vetting appeals

All applicants have the right to appeal against a vetting decision. Thames Valley Police has recruited an independent appeals manager to handle vetting appeals from external applicants. Once the vetting appeals manager makes their decision, they inform the applicant and recruitment and update relevant force systems. The vetting appeals manager, where appropriate, provides feedback to the original decision-maker. The force told us that this was helping improve vetting decision-making.

The deputy chief constable handles vetting appeals from internal candidates.

During our inspection, we reviewed three vetting appeal decisions. We found that the vetting appeals manager recorded a detailed rationale for their decision and put in place risk mitigation in appropriate cases.

Quality assurance

Thames Valley Police doesn't have a formal quality assurance process for vetting decision-making. However, the FVU uses some informal methods to assess the quality of its decisions.

The force told us that all vetting managers were responsible for reviewing decisions where the following risks have been identified:

- unmanageable debt;
- violence against women and girls; and
- criminal convictions and police [cautions](#).

Vetting managers record the outcome of their review on the vetting file. And the vetting appeals manager provides feedback to vetting officers after completing an appeal.

We were told that 1 of the 4 vetting teams completed 24 peer review assessments per month. We encourage the force to extend this peer review process across all vetting teams.

Furthermore, the force should formalise its quality assurance process to make sure it is consistently applied across all vetting decisions.

Disproportionality

The APP states there is a risk that vetting has a disproportionate impact on under-represented groups. The APP also requires forces to monitor vetting applications, at all levels, against [protected characteristics](#). This is so forces can understand whether there is any disproportionate impact on particular groups. Where [disproportionality](#) is identified, forces must address this. The APP also states that forces should support and promote [positive action](#) for all under-represented groups in the police service.

The force analyses the outcomes of all vetting applications from people who declare any of the nine protected characteristics.

The FVU compiles a monthly report on disproportionality in vetting decisions. It sends the report to the deputy chief constable, the staff association of minority ethnic staff, the race equality assurance lead and the [Police Race Action Plan](#) board.

Upholding the standards of professional behaviour

Requires improvement

Thames Valley 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

Public confidence in the police depends on [police officers](#) and [staff](#) showing high standards of professional behaviour. It is important that everyone in a supervisory or managerial 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

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

We found that the force provided initial training for the workforce on the expected standards and additional training for supervisors. The [professional standards department \(PSD\)](#) takes part in the initial training of probationary police officers. This is in addition to the mandatory College of Policing training covering the Code of Ethics, sexual [harassment](#) in the workplace and [abuse of position for a sexual purpose](#).

The PSD also provides training for supervisors through its 'inclusive leadership' and 'healthy team culture' courses. This covers PSD structure and processes. It outlines the expectations of supervisors in relation to setting and maintaining standards and challenging poor behaviour. It provides practical examples, including warning signs to watch out for and possible early interventions.

The PSD circulates the outcomes of gross [misconduct hearings](#) internally and externally. It also publishes its 'Professional as standard' newsletter every six weeks, which reinforces key themes and expectations. Recent article topics have included sexual harassment in the workplace and corruption risks linked to the cost-of-living crisis.

The force sets out the expected standards of behaviour on its intranet, supported by posters in police buildings. It reminds all [personnel](#) of the expected standards in its weekly 'In the know' newsletter. And the chief constable reinforces those expectations in regular blogs.

The [chief officer](#) team has formed a leadership academy and developed a matrix to encourage a healthy organisational culture and reinforce the standards of professional behaviour. The force assesses individuals' understanding of this during promotion processes.

However, members of the workforce told us that they didn't get face-to-face briefings, messaging or training, which limits the opportunity for discussion and debate.

We recommend that the force reviews this feedback. We encourage the force to raise the profile and involvement of its senior leaders. This will reinforce the existing messaging on the standards of professional behaviour.

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

Thames Valley Police doesn't routinely check that the workforce understands organisational learning and the expected standards of professional behaviour. We found that the workforce had a reasonable understanding of the expected standards but a limited knowledge of organisational learning.

The force checks individuals' understanding of the standards of professional behaviour during promotion processes. But it carries out no other formal evaluation of the workforce's understanding of the expected standards or organisational learning messages.

The PSD provides named points of contact to all senior leadership teams across the force. It expects designated complaints resolution officers to spend one day per week based in their local policing area to discuss complaints and [misconduct](#) themes. The complaints resolution officers support local area inspectors handling complaints and make sure the workforce understands how to report concerns.

We heard that PSD personnel were rarely seen but were very responsive to telephone or email contact. But PSD personnel told us that demand on them had significantly increased since 2022. This has reduced their visibility.

We encourage PSD personnel to raise their profile and take part in further force events. This would support senior leaders across the force to communicate and reinforce the standards of professional behaviour.

Organisational learning

Thames Valley Police has a process for collecting and sharing organisational learning.

The deputy chief constable chairs a quarterly risk improvement and learning board, which monitors force progress against national recommendations. This includes those made by the [Independent Office for Police Conduct \(IOPC\)](#), [HMICFRS](#), office of the [police and crime commissioner](#) (OPCC) and the [Angiolini Inquiry](#).

The force's service improvement lead chairs a recommendations panel, which informs the risk improvement and learning board. This panel manages, assesses and tracks all learning and recommendations.

The PSD has a monthly organisational learning meeting where it collates learning, both internally and from IOPC circulations. The PSD updates members of the workforce in newsletters and intranet bulletins and through local area representatives. The PSD escalates examples of internal organisational learning to the risk improvement and learning board through the recommendations panel.

The force also has a [victim](#) satisfaction learning group. This forum identifies and shares learning and themes arising from complaints. It analyses trends in complaints and misconduct and identifies where it should focus activity. The head of the PSD chairs a performance meeting every six weeks to consider this analysis and identify themes and patterns. The chair refers force-level themes to the strategic performance meeting.

However, during our inspection we found no evidence that the force evaluated the implementation of organisational learning.

We found that the force maintained relationships with internal and external networks to help reinforce standards of professional behaviour and improve organisational learning and understanding.

The force consults an [independent advisory group](#) and works with independent [domestic abuse](#) and sexual violence advocates. This helps it communicate the expected standards of professional behaviour to external groups. It generates [intelligence](#) and supports victims of police-perpetrated domestic abuse and sexual violence.

At the time of our inspection, the PSD and OPCC had recently set up a complaints and standards panel to review complaints. The panel includes lay members to provide independent scrutiny of the complaints process.

The head of the PSD and the head of workforce planning jointly chair the strategic [ethics committee](#). This has representation from vetting, local policing areas and other departments. It includes an external consultant from the University of Oxford.

The head of the PSD holds regular formal meetings with staff associations, unions and support networks, to discuss [disproportionality](#), vetting and other relevant themes.

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 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.

[Professional standards department](#) complaint recorders, the equivalent of sergeant rank, make the initial decision on how a complaint should be handled.

They decide whether a case is handled inside or outside [Schedule 3 of the Police Reform Act 2002](#), whether the matter requires referral to the [Independent Office for Police Conduct](#) and whether, if recorded under Schedule 3, it should be handled otherwise than by investigation.

[Appropriate authorities](#) aren't quality assuring the complaints resolution team's decisions to handle complaints informally outside Schedule 3 using the [service recovery](#) process.

During our case file review, we saw one Schedule 3 case handled otherwise than by investigation that the appropriate authority hadn't seen.

This is contrary to the requirements of the Police Reform Act 2002, [Police \(Complaints and Misconduct\) Regulations 2020](#), Independent Office for Police Conduct statutory guidance and the force's [scheme of delegation](#).

A delegated appropriate authority of at least the rank of inspector or [police staff](#) equivalent must make all decisions to record a complaint under Schedule 3, and any subsequent handling decision. The complaint recorders aren't of this seniority.

The force told us it would change its process with immediate effect.

Area for improvement: The force needs to improve the way it handles and manages complaints and conduct allegations

This is in respect of the force's:

- formulation of terms of reference;
- referral of cases to the [Independent Office for Police Conduct](#); and
- provision of handling decisions to complainants.

In 11 of the 19 complaint cases we reviewed, the force took more than 14 working days to notify the complainant of its handling decision. And we found that the force didn't always fully update complainants with a rationale as to how it had decided to handle each complaint. In 3 of the 19 complaints, it didn't provide a full rationale to the complainant.

In our review, we found nine complaint cases that required a mandatory referral to the Independent Office for Police Conduct. The force only referred three of them. The cases that the force didn't refer included sexual offences, a racially aggravated public order offence and a serious assault.

We examined 19 conduct cases that the [professional standards department](#) had investigated. It hadn't recorded appropriate terms of reference in 13 of them. And in complaint investigations, it hadn't recorded appropriate terms of reference in 5 of the 10 cases we examined.

Only 5 of the 29 investigated cases we examined had an investigation plan. And we found evidence that supervisors carried out regular and structured reviews of these investigations in only eight of those cases.

Capacity and capability in the PSD

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 a 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 PSD

The force has an established [scheme of delegation](#) document signed by the chief constable in August 2023. It delegates authority for PSD decision-making to the deputy chief constable. The deputy chief constable remains responsible for all suspension and accelerated hearing decisions. The head of the PSD and the PSD detective chief inspector make all [gross misconduct](#) final determinations. The chief constable delegates other PSD decisions to personnel of the rank of inspector or above or the police staff equivalent.

We found that the PSD had established governance, structures and processes in place. However, the force could benefit from the introduction of a PSD daily management meeting. This would improve co-ordination and prioritisation across PSD teams and help manage the workload.

We found that the PSD mostly had enough resources to carry out its role. The force invested extra resources in the PSD, particularly in investigations, 18 months before our inspection.

The head of the PSD, a detective chief superintendent, reports directly to the deputy chief constable. The PSD includes a service delivery team, a complaint resolution team and a team of PSD investigators.

Two PSD support managers, assisted by an inspector, lead the service delivery and complaints resolution teams. The complaints resolution team includes a detective sergeant, seven police constables and one staff member. The service delivery team includes two outcomes managers, three misconduct proceedings managers, two support co-ordinators and four administrative support assistants.

We found that the two PSD support managers were operating effectively, but their workloads meant they were at capacity. Our inspection also found that personnel who weren't of appropriate seniority were making PSD decisions. The force has committed to changing its complaint-handing process. This will increase the workloads of both support managers.

The PSD investigation team includes:

- a detective chief inspector as head of investigations;
- a detective inspector;
- two detective sergeants;
- six detective constables;
- six police staff investigators;
- a support officer; and
- a business analyst.

At the time of our inspection, there were vacancies for two detective constables and one detective sergeant. The force had recently approved these new posts and were in the process of recruiting into them.

We found that PSD investigator workloads were manageable. Our review of the PSD IT system, Centurion, showed that each investigator had 15 to 16 cases. These included live investigations, cases they were handling otherwise than by investigation and [death and serious injury](#) cases for which PSD investigators are the IOPC contact. PSD investigators felt that they had enough capacity and capability to carry out their role.

At the time of our inspection, PSD personnel told us that there were enough team members to initially handle and promptly allocate new complaints based on current demand levels. However, the force had projected a significant increase in demand. PSD personnel expressed concern that this would affect the team's capacity to handle the workload.

In 7 of the 19 complaint cases we examined, the PSD took more than 14 working days to make a handling decision. This suggests that the [appropriate authorities](#) may not have enough capacity to address complaints within a reasonable timescale.

The PSD also has limited capacity to quality assure how the force deals with the service recovery of complaints and complaints dealt with otherwise than by investigation by other force areas and departments. The force told us that it was due to create an administrative team leader post in July 2025 to help reduce demand on the complaints resolution team inspector.

Training and experience within the PSD

PSD personnel have a good level of experience, and the force has provided them with a good level of training.

Senior officers are experienced and trained appropriately to effectively carry out their roles. The head of the PSD is accredited to [professionalising investigations programme \(PIP\)](#) level 4, and the detective chief inspector is PIP level 3 accredited.

The investigation team includes trained and experienced investigators. As some were previously domestic abuse investigators, the PSD can now deal with all police-perpetrated domestic abuse allegations. All investigators have received the College of Policing-endorsed PSD investigators course and are PIP accredited. Most have achieved PIP level 2.

Some investigators have attended the [specialist child abuse investigators development programme](#) and a sexual offences investigation course. And the force has provided other in-house training. This includes misconduct training by a barrister and training in respect of sexual harassment, abuse of position for a sexual purpose and [disclosure](#).

The level 3 PIP-accredited detective chief inspector provides investigators with [continuing professional development](#).

The complaints resolution team is also very experienced. PSD personnel told us that they had completed a range of training including the IOPC complaint-handling course as well as training in IT databases such as Centurion, [Niche](#) and the [Police National Computer](#).

The PSD casework team is appropriately trained. Every member has the skills they need to complete all the daily workflows and input and to extract information from multiple systems to keep case files up to date.

The PSD has provided guidance to local policing area inspectors to help them effectively manage the complaints it allocates to them.

The PSD provides [on-call](#) out-of-hours coverage. The detective sergeants, detective constables and police staff investigators work on-call, but senior leaders are accessible. Senior leaders encourage on-call officers and staff to phone them out of normal office hours, seven days a week, if they need to discuss urgent PSD matters. A force-level [senior investigating officer](#) leads the initial investigation in death and serious injury cases. We urge the force to satisfy itself that the level and seniority of its formal out-of-hours PSD cover is enough.

We found that the force had provided PSD personnel with some training on handling cases involving discrimination, mostly by way of e-learning. Those who had attended the College of Policing-endorsed PSD training would also have had some training on this. But we found that some personnel had limited understanding of IOPC guidance on handling cases involving discrimination. Some personnel weren't aware of the guidance at all.

We also spoke to members of the workforce with responsibility for handling complaints outside the PSD. Nobody was aware there was guidance on the handling of discrimination cases. Some had dealt with cases with actual or perceived discrimination without any knowledge of their specific responsibilities as complaint handlers.

The force told us that an IOPC review in 2024 found deficiencies in the way it handled some discrimination cases. The IOPC considered 4 conduct and 11 complaint matters containing an element of discrimination. Its findings noted a disparity between the quality of conduct investigations and the lack of quality in complaint investigations. And generally, the force hadn't asked for explanations from the officers complained about. The report, which wasn't published, made two recommendations. These were:

- Investigators should use the IOPC discrimination case guidelines.
- The force should provide additional training to those handling discrimination cases.

We urge the force to review the training and guidance it has provided to those dealing with complaint and [conduct matters](#) relating to discrimination and to implement the IOPC recommendations.

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](#) for all forces in England and Wales. These regulations provide a flexible approach to handling conduct matters and complaints about the police.

To promote a culture of learning in police forces, the most recent 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 guidance by making handling decisions in a timely manner.

The initial handling of complaints and conduct matters

When the force receives complaints and allegations of breaches of the standards of professional behaviour, it must assess them. This is to decide whether they need to be formally recorded under [Schedule 3 of the Police Reform Act 2002](#). This is in line with the [statutory guidance](#) for the police complaints system. This process creates accurate, auditable records that can be relied on in subsequent investigations and disciplinary proceedings.

All 43 police forces in England and Wales use the Centurion IT system 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 force generally logs and records public complaints in a timely way. The IOPC published [complaints data for the period 1 April 2024 to 31 March 2025](#). It shows that the force logged public complaints in an average of two working days. This compares to an average of four working days for similar forces and a national average of seven working days.

In Thames Valley Police, the complaints resolution team or local command units handle complaint cases outside Schedule 3. The force allocates cases recorded under Schedule 3 to the local policing area or the PSD investigation team, depending on which the force deems most suitable. The PSD investigation team deals with all [special procedures](#) cases.

We reviewed ten cases the force dealt with by way of service recovery. During our review, we found instances of the force resolving the complaint on the first day, with the complainant being satisfied with the outcome. However, we found that the force didn't sufficiently quality assure the handling and resolution of complaints outside Schedule 3.

We reviewed 19 complaint cases recorded under Schedule 3. The force recorded 12 of these cases within 2 working days. In a further 5 cases, it recorded the matter within 8 working days. It took over 14 working days to record 2 cases.

At the time of our inspection, there were no cases awaiting an initial handling decision.

We found that the PSD appropriate authorities weren't making all the initial decisions in respect of complaint handling. They aren't making the formal decision for all Schedule 3 complaints when dealt with otherwise than by investigation. PSD complaint recorders, who are the equivalent of sergeant rank, make these decisions. Nor are the appropriate authorities quality assuring initial decisions made by the complaints resolution team to handle complaints informally outside Schedule 3 using the service recovery process.

During our case file review, we saw one Schedule 3 case that a member of the PSD investigation team handled otherwise than by investigation that the appropriate authority hadn't seen. This is contrary to the requirements of the Police Reform Act 2002, the Police (Complaints and Misconduct) Regulations 2020, the IOPC statutory guidance and the force's own scheme of delegation. A delegated appropriate authority of at least the rank of inspector or police staff equivalent must make all decisions to record and handle a complaint under Schedule 3. The complaint recorders aren't of this seniority.

The force told us it would change this process with immediate effect.

Thames Valley Police doesn't always make relevant enquiries with other areas of the force before making a handling decision. We found that the PSD only made relevant enquiries in 7 of the 19 complaint cases.

In 9 of these 19 cases, the force made a handling decision within 2 working days of recording the case. In 7 cases, the force took over 14 working days to make the handling decision.

In 14 of the 19 cases, we found that the PSD handled the case appropriately. We found all 10 cases where the force had decided to handle the complaint otherwise than by investigation to be appropriate.

But in five investigated cases, the force could have handled the complaint more effectively by means otherwise than by investigation. The force told us that in April 2025, it amended its approach to handling complaints as it was investigating too many unnecessarily. Our findings support this decision.

In all but 2 of the 19 complaint cases, the PSD recorded a rationale for how it decided to deal with the complaint. However, we found that the force didn't always fully update complainants with a rationale as to how it had decided to handle their complaint. In 3 of the 19 complaints, it didn't provide a full rationale to the complainant. And we found that in 11 of the 19 complaint cases, the force took more than 14 working days to notify the complainant of its handling decision.

We [dip sampled](#) five Schedule 3 complaint cases where the force had decided to take no further action. The force's decision was appropriate in all of them. The PSD recorded a detailed rationale for each decision, which it provided to the complainant.

Initial handling of conduct matters

Thames Valley Police is inappropriately and incorrectly recording some conduct matters on Centurion using a miscellaneous category.

We found examples where obvious [recordable conduct matters](#) were allocated a miscellaneous reference instead of the recognised conduct reference. The use of the miscellaneous category affects IOPC data and doesn't comply with Centurion and IOPC recording conventions.

We found during our case file review that the PSD recorded and made a subsequent handling decision in most conduct cases without delay. In 19 of the 26 cases we reviewed, it recorded the allegation on Centurion within 2 working days. And in 22 of the 26, it made a subsequent handling decision within 2 working days.

We also found that in 23 of the 26 conduct cases, the force had recorded its decision-making on how it would handle the matter. This was either by investigation or otherwise than by investigation. But in seven cases, the PSD hadn't notified the complainant of its handling decision.

We found nine allegations of misconduct that contained elements of discrimination or sexual misconduct. The force correctly identified and recorded eight of them.

In 18 of the 19 conduct cases that required a [severity assessment](#), the appropriate authority completed the assessment. But an appropriate authority had only carried out a review of the severity assessment in 3 of the 9 cases where it was required.

In two cases, we disagreed with the initial severity assessment. The appropriate authority had assessed the allegations as misconduct. Both cases involved allegations of excessive use of force and were reported to the PSD by concerned supervisors. In both cases, the officers showed a clear pattern of behaviour.

IOPC statutory guidance states that the severity assessment must be made on the basis of what would happen if the conduct alleged was proved. The PSD should have initially assessed these matters as gross misconduct until evidence demonstrated that excessive force hadn't been used.

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. They also include 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](#).

In our review, we found nine complaint cases that required a mandatory referral to the IOPC. The force only referred three of them. The cases that the force didn't refer included sexual offences, a racially aggravated public order offence and a serious assault.

In 11 of the 45 cases we examined, there was an allegation of police criminality. These included potential offences under the [Theft Act 1968](#), the [Public Order Act 1986](#), and the [Sexual Offences Act 2003](#). In each case, the PSD identified the potential crime and dealt with it appropriately.

Accessibility of the force 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](#).

Thames Valley Police has some measures in place to make sure its complaints system is accessible.

The public can make complaints using a variety of channels, which the force outlines on its website. These include:

- using the national online complaints form;
- writing to the PSD or the IOPC;
- visiting a local police station;
- contacting the force by phone; and
- a textphone service for complainants with hearing or speech difficulties.

Local policing teams will visit [vulnerable people](#) at home.

Thames Valley Police's area has a high number of non-English speaking residents. The force uses the 'LanguageLine' translation service for complaints made in person. For complainants calling the force, call handlers use a translation service. The force also has its own 'LINGO' database of its personnel's language skills, which complements existing translation services.

Additionally, the force uses the 'SignVideo' service to converse with people with impaired hearing.

Thames Valley Police doesn't always support complainants who may need additional help. Of the 19 complaint cases we examined, complainants may have needed additional support on 2 occasions. The force only provided extra help in one case. In the other case, the force identified that an elderly complainant might need additional support, but there was no evidence that it considered this further or provided extra help.

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.

Thames Valley Police is comparatively timely at finalising cases by investigation. The IOPC published [complaints data for the period 1 April 2024 to 31 March 2025](#). It shows that the force took an average of 206 working days to finalise cases by investigation. This compares to an average of 173 working days for similar forces and a national average of 220 working days.

The IOPC bulletin also shows that the force investigates a far greater number of complaints compared to similar forces and the national average. Data for the period 1 April 2024 to 31 March 2025 shows that Thames Valley Police investigated 46 percent of complaints. This compares to an average of 13 percent for similar forces and a national average of 10 percent.

At the time of our inspection, the extra investigations had created unnecessary quality assurance demands on the PSD and delays in finalising cases for complainants. The force quality assures all investigated complaints before finalisation.

The force told us that in December 2024, it reviewed PSD processes with the OPCC. The review identified that the PSD formally investigated a larger number of complaints under Schedule 3 than most other forces. And it found too much bureaucracy, unnecessary demand and delay. The force has now reviewed its approach to handling complaints, which should bring it in line with most similar forces and national averages.

Our review of complaint and conduct case files found instances where the force carried out proportionate investigations. When it resolved complaint cases otherwise than by investigation, this was also proportionate. On conclusion of cases, the investigating officer or case handler prepares an outcome letter or final report of an acceptable standard.

We found that in 13 of the 19 investigated conduct cases we examined, the PSD hadn't recorded appropriate terms of reference. In 5 of the 10 complaint investigations we examined, the PSD hadn't recorded appropriate terms of reference.

We found that the force didn't state terms of reference in its [Regulation 17](#) notices provided to officers under investigation. However, these are generic and not case specific.

Only 5 of the 29 investigated cases had an investigation plan. We saw evidence of supervisors carrying out regular and structured reviews in only 8 of the 29 cases. In most cases, we found evidence of investigators maintaining decision logs.

In [our 2022 national report 'An inspection of vetting, misconduct and misogyny in the police service'](#), we recommended that forces should produce and follow an investigation plan, endorsed by a supervisor. At the time of our inspection, Thames Valley Police still hadn't implemented this recommendation.

The force isn't using the Centurion IT system in a standardised way. And its retention of documents is also inconsistent.

The force has produced a Centurion procedure document dated April 2025. The document outlines who is authorised to have access to the system and who is responsible for administering it. The document outlines how members of the PSD can access the online support manual.

We found no evidence that the force had provided formal training to those using Centurion. And we saw no evidence that the force had prepared guidance or policy on how the system should be used. Therefore, investigators are using it and other shared folders as they see fit.

We found that some documents were stored on shared or individual computer drives and on individual email accounts. This makes it difficult for colleagues, supervisors or those auditing cases to find relevant material. We urge the force to standardise its use of Centurion.

[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.

Thames Valley Police considers the welfare of accused police personnel and those making internal conduct allegations. But it could improve its approach.

The force has produced a policy document guiding the identification and deployment of welfare support officers in appropriate cases. It appoints a welfare support officer in significant criminal or gross misconduct cases or where it has identified an elevated risk.

It also states a welfare support officer may be appointed for cases being investigated by the IOPC, in a death or serious injury case or if the case is of significant media interest. The PSD also uses sexual offence liaison officers to support victims of sexual offences throughout the investigation process.

The force has also compiled a range of guidance documents, including:

- a welfare [risk assessment](#) document and associated risk matrix to assess the risk to those under investigation;
- comprehensive guidance for welfare support officers covering areas such as confidentiality, suspension, suicide and self-harm;
- guidance for victims and witnesses covering areas such as communication and possible outcomes;
- signposting for the accused and interested persons to additional external support; and
- guidance for investigating officers on providing support for victims and witnesses.

However, the force doesn't use this guidance or its welfare support officers as effectively as it could. For example, it could improve the co-ordination and oversight of welfare support officers. Some welfare support officers told us that their training was inconsistent. This undermines the workforce's confidence in them.

Local line managers take primary responsibility for individuals' welfare. The force's staff associations help support both accused members and internal complainants.

We found no evidence of any formalised welfare support for PSD personnel. The force should consider whether a more formalised approach would be beneficial.

[Suspension and restriction of members of the workforce and accelerated procedures](#)

In March 2025, Thames Valley Police published a suspension policy for officers and staff. The policy includes guidance on suspending or redeploying the accused person and the restrictions that the force may apply as an alternative to suspension.

It also provides detail on the use of [accelerated procedures](#) in certain cases. The chief constable can use these procedures to review allegations quickly and dismiss officers if there is incontrovertible evidence of gross misconduct.

We found that the force considered suspending or redeploying the accused person in 12 of the 18 cases where it was appropriate. At the time of our inspection, the force told us that 29 officers and 5 staff were suspended and that 21 officers were on restricted duties.

The deputy chief constable is responsible for the suspension and subsequent review of officers. The head of the PSD is responsible for the suspension and subsequent review of police staff and restrictions on both officers and staff. The force carries out 28-day reviews of all suspensions.

The force told us that in 2024, it held 64 gross misconduct hearings. This is a 146 percent increase on the previous year. In the same period, it dismissed 49 officers, which is an increase of 220 percent. The force used accelerated procedures in 17 gross misconduct cases, which is an increase on the 6 carried out the previous year.

The force regularly and accurately updates the College of Policing [barred and advisory lists](#). The entries matched the details held on Centurion by the force.

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 police and crime commissioner.

Thames Valley Police mostly provided an acceptable level of service to complainants. We examined 19 complaints and found that in all but one case, the complainant received a good level of service. In that case, the force didn't update the complainant with the outcome of their case. And in some cases, the investigator didn't keep the complainant fully updated with progress.

The PSD outcomes officer quality assures all finalised Schedule 3 complaint investigations handled by way of investigation to make sure complainants received a good service. The officer checks the quality of the investigation, drafts the finalisation letter and forwards it to the complainant. The force isn't carrying out this level of quality assurance for cases handled otherwise than by investigation.

In some cases, when complainants are dissatisfied with the outcome of an investigation, they can ask the IOPC for a review. Between 1 April 2024 and 31 March 2025, the IOPC finalised 46 applications for a review of complaint cases that Thames Valley Police had investigated. It found that 15 had an outcome that wasn't reasonable and proportionate.

During the same period, the IOPC carried out two reviews of complaints the force had concluded otherwise than by investigation. It found that both cases had an outcome that was reasonable and proportionate.

The OPCC finalised 138 complaint reviews of cases the force had investigated during the same period. It found that the outcome wasn't reasonable and proportionate in 43 cases.

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

Recording and sharing of adverse information

Thames Valley Police regularly shares relevant information between departments and has an established process for doing so. We found that the PSD worked with HR, the [force vetting unit](#), the [counter-corruption unit \(CCU\)](#) and other divisions and departments when dealing with complaint and conduct matters.

The force holds a six-weekly [people intelligence meeting](#) to draw together a range of information on the workforce. The meeting is attended by the PSD, the force vetting unit, the CCU, legal services, people services and learning and development representatives.

The PSD has well established meetings with senior leadership teams for local policing areas and force departments. This is to discuss recent professional standards learning, problematic individuals and emerging themes and trends, including relevant interventions.

The weekly PSD senior management team meeting also routinely considers relevant information that it and other divisions and departments hold about members of the workforce. Each PSD area representative provides an update to the meeting. This includes immediate priorities, pending disciplinary procedures, cases of note, duty cover responsibilities, emerging people intelligence and welfare issues.

The PSD produces a six-weekly analytical report on trends in complaints and misconduct for its senior managers and local policing areas. It highlights members of the workforce who have attracted 5 or more complaints or conduct matters in a rolling 12-month period.

We found that Thames Valley Police routinely considered relevant information from grievances and employment tribunals to identify potential breaches of the standards of professional behaviour. The force also makes sure that criminal cases where members of the workforce have been acquitted or subject to no further action are reviewed to determine if there is any misconduct. However, we found no evidence that the force regularly reviewed civil litigation cases to identify potential breaches of the standards of professional behaviour.

Considering relevant information

We found that the PSD considered previous complaint and conduct history in most cases before making handling decisions.

The force told us that PSD caseworkers checked previous Centurion entries for patterns of repeated behaviour. The PSD investigation team also researches conduct and performance concerns and liaises regularly with CCU colleagues, people services and line managers. And members of the PSD told us that the appropriate authorities' initial assessments incorporated wider conduct and performance concerns, which highlight patterns of behaviour.

We found that the PSD made enquiries with other areas of the force before making a handling decision in 23 of the 26 conduct cases we reviewed. It only made enquiries in 7 of the 19 complaint cases.

Holding police officers and staff accountable for their behaviour

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

The [professional standards department \(PSD\)](#) carries out limited activity to establish if [disproportionality](#) exists in its complaints and conduct cases. However, this focuses on ethnicity data only, which is incomplete. The force carries out annual reviews of disproportionate outcomes for members of the workforce from ethnic minority backgrounds across conduct and complaint cases.

While the force is taking some steps to prevent and identify disproportionality, the PSD doesn't carry out any formal, detailed analysis to establish if there is any disproportionality across all [protected characteristics](#) in its investigations and decision-making.

To fully understand disproportionality in its PSD decision-making and the reasons for it, the force should carry out detailed analysis across the nine protected characteristics. It can then address any disproportionality.

Consistency and fairness in decision-making

Forces must hold officers and staff 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.

In PSD complaint and conduct investigations, Thames Valley Police's decision-making is consistent and fair.

The force has processes in place to review the fairness, consistency and proportionality of PSD decision-making. It told us that where appropriate, the two experienced PSD support managers sense checked decisions with relevant staff networks, unions, staff associations, PSD colleagues and regional and force peers. This helps maintain consistency and proportionality in decision-making.

The head of the PSD and the PSD detective chief inspector carry out all gross misconduct determinations. They are members of the national appropriate authorities network, which helps maintain consistency both locally and nationally. The force has also invested in barrister-led misconduct training for chairs of hearings and meetings and for PSD investigators.

In our review of 26 conduct and 19 complaint cases, we found no evidence of disproportionality in decision-making or outcome. We spoke with numerous individual members of the workforce. Most stated that they didn't see any disparity or unfairness in PSD decisions and case outcomes.

The PSD carries out limited activity to establish if disproportionality exists. However, this focuses on ethnicity data only, which is incomplete. The force carries out annual reviews of disproportionate outcomes for members of the workforce from ethnic minority backgrounds across conduct and complaint cases.

While the force is taking some steps to prevent and identify disproportionality, the PSD doesn't carry out any formal, detailed analysis to establish if there is any disproportionality across all protected characteristics in its investigations and decision-making.

To fully understand disproportionality in its PSD decision-making and the reasons for it, the force should carry out detailed analysis across the nine protected characteristics. It can then address any disproportionality.

Tackling potential corruption

Requires
improvement

Thames Valley Police requires improvement at tackling potential corruption and preventing misuse of IT systems.

Preventing misuse of IT systems

Area for improvement: The force needs to improve how it monitors its IT systems

Thames Valley Police can monitor most of its IT systems across mobile and desktop devices. But it has recently identified difficulties with monitoring some force IT systems. It has only added one aspect of this to the force risk register. We encourage the force to make sure it accurately records the full scope of these risks. The [counter-corruption unit \(CCU\)](#) uses auditing to overcome some of these monitoring difficulties. The CCU is also working with IT providers to mitigate some potential risks.

The force allows the use of [encrypted applications](#) (apps) on its devices, subject to line manager authorisation. There are risks in allowing this. For example, the apps limit the CCU's ability to monitor activity and make sure content complies with force policy. The CCU wasn't able to identify how many [police personnel](#) had authorisation to use such apps.

The force should make sure the CCU maintains an accurate record of every individual authorised to use encrypted apps. And it should provide each individual with specific guidance on the expected standards of professional behaviour when using such apps.

Lawful business and IT monitoring capability

Lawful business monitoring is a legitimate way for forces to monitor their information systems and methods of communication. It allows forces to identify improper use of communication devices. This includes inappropriate contact with [vulnerable people](#), computer misuse, unlawful access to police records and wrongful disclosure of police data.

The counter-corruption ([intelligence](#)) [authorised professional practice \(APP\)](#) (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 software allows the force to create alerts that immediately notify investigating [officers](#) when sexualised language is used in external communications or if a specific police record or data has been unlawfully accessed or printed.

Most forces can use IT monitoring to gather corruption-related intelligence to help identify corrupt individuals. It can be particularly useful to monitor [police personnel](#) who are of concern to the force and identify irregular access to systems. 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

Thames Valley Police can monitor most of its IT systems across mobile and desktop devices. But it has recently identified difficulties with monitoring some force IT systems. It has only added one aspect of this to the force risk register. We encourage the force to make sure it accurately records the full scope of these risks. The CCU uses auditing to overcome some of these monitoring difficulties. The CCU is also working with IT providers to mitigate some potential risks.

The CCU uses a range of different methods to proactively monitor activity on mobile and desktop devices. This helps identify potential [misconduct](#), including improper contact with vulnerable [victims](#) or [organised crime groups](#). But CCU investigators told us that they sometimes paused proactive monitoring due to high workloads and limited resilience within the unit.

A force's ability to effectively monitor all use of its IT systems was recommendation 35 in [our 2022 national report 'An inspection of vetting, misconduct, and misogyny in the police service'](#). At the time of our inspection, Thames Valley Police had only partially implemented this recommendation.

The force monitors police personnel IT use when intelligence shows they may pose a high risk. The CCU identifies the officers and [staff](#) by analysing intelligence reports and in response to information from complaints and reports of misconduct. The CCU maintains registers of police personnel who present a range of corruption risks. CCU personnel record what action they take to manage and mitigate these risks.

The head of CCU attends a fortnightly technical efficiency board. This makes sure that any IT systems being developed or procured can be audited.

IT monitoring policy

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

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

Digital device management

To protect sensitive information, it is important that forces manage their mobile devices. It is essential that they have accurate records of who has each device so that they 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 personnel aren't using them for unauthorised purposes.

The force can identify which members of the workforce are accessing different IT systems. The IT department keeps a register that identifies all mobile devices and to whom they are issued. CCU personnel have access to this register. We found that the register was accurate and identified the current user of every mobile device. It would be beneficial, to avoid the risk of compromise, if the CCU could access this register covertly.

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.

Thames Valley Police allows the use of encrypted apps in limited circumstances, such as by officers working in rural communities. And it is subject to line manager authorisation.

The force's social media and online communications behaviour guide provides clear guidance to the workforce. But there are risks in allowing members of the workforce to use encrypted apps. The apps limit the CCU's ability to monitor activity to make sure

the content complies with force policy. Further, the CCU couldn't say how many police personnel have been authorised to use encrypted apps.

The [professional standards department \(PSD\)](#) and the CCU provide training and guidance to the workforce about the risks associated with social media use. This includes the standards of behaviour expected when using encrypted apps on either personal or force-issued devices. But some officers and staff we spoke to showed only limited awareness of the force's policy and expectations.

Artificial intelligence

Artificial intelligence (AI) offers an opportunity to improve police performance and productivity. But its use is contentious. The [National Police Chiefs' Council](#) is addressing concerns by taking part in [a research project, PROBABLE Futures](#), to make sure its use is responsible and transparent.

Some forces are exploring how AI can create efficiencies. This includes trialling AI in [control rooms](#) to help manage calls from the public, to develop transcription and translation tools and to examine large datasets to identify suspected [child](#) exploitation offences.

But there are risks associated with using AI in policing. For example, some forces have identified officers and staff using AI-powered apps to help them write reports and witness statements. This increases the risk of non-compliance with security policies and legislation. Accessing these apps could also result in officers and staff sending sensitive data from police IT systems to their personal email addresses.

To prevent misuse of AI, forces should recognise the emerging risks and give guidance on its appropriate use to their officers and staff.

Thames Valley Police CCU told us that its proactive IT audits had identified examples of officers using external online AI apps to write reports and witness statements. In doing so, the officers had breached data security. The force was in the process of drafting a guidance document to be published on its intranet.

Tackling potential corruption

Area for improvement: The force needs to improve how it assesses, monitors and develops counter-corruption intelligence

The force should make sure that:

- it implements effective force-wide random drug testing; and
- in appropriate cases, it carries out [ethical interviews](#) to address corruption-related risks.

The force's alcohol, drugs and substance misuse policy allows for random drug testing of student [police officers](#) and police officers and [staff](#) in specific vulnerable roles. However, at the time of our inspection, the force didn't carry out any random drug testing. This was surprising as the force had identified substance misuse as one of its main corruption risks. The force is missing opportunities to deter substance misuse, identify potential [misconduct](#) and provide reassurance to the public.

The force told us that the [counter-corruption unit](#) sometimes used ethical interviews, often working with the [force vetting unit](#), to address unresolved corruption-related concerns. But we saw four examples of counter-corruption unit investigators not using ethical interviews when it would have been appropriate to do so.

Area for improvement: The force needs to improve how it prevents corruption

The force should make sure that:

- all entries in the gifts and hospitality register are accurate and the [counter-corruption unit \(CCU\)](#) regularly reviews the register to assess corruption risk; and
- it strengthens its business interests arrangements so that corruption-related [intelligence](#) informs all authorisation decisions.

We found that numerous entries in the force's gifts and hospitality register indicated that the gifts hadn't been accepted. But information in the entries contradicted this. And the force had approved numerous items that were against its policy, such as gift cards and alcohol. The CCU isn't routinely overseeing the gifts and hospitality register for corruption risks. It should.

The CCU isn't routinely consulted on all business interest decisions. This means it may not consider intelligence held on the CCU database before making a decision on the authorisation of the business interest.

Intelligence

Sources of corruption-related intelligence

Thames Valley Police CCU actively looks for corruption-related intelligence as a matter of routine. Each member of the CCU is responsible for proactively searching for different types of corruption-related intelligence. The CCU's IT monitoring system helps them to identify potential misconduct. In addition, CCU personnel use a variety of tactics and systems to carry out this work.

The force uses an anonymous independent confidential reporting line, known as 'i-line'. The force told us that between 1 January 2023 and 31 December 2023, it received 93 reports through the reporting line. Between 1 January 2024 and 31 December 2024, it received 134 reports. From 1 January 2025 up to the date of our inspection, 2 June 2025, it received 70 reports.

The force also uses the national Crimestoppers integrity line. The force told us that in 2024, it received 21 reports through this channel. From 1 January 2025 up to the date of our inspection, it received ten reports.

We examined 60 corruption intelligence files. In 21 cases, we found that police personnel reported the intelligence using a confidential reporting line. In eight cases, personnel directly reported intelligence to the CCU, for example by email. In seven other cases, members of the public made the reports. We found three further cases that were the result of proactive intelligence work. Further sources of corruption-related intelligence included external agencies, [covert human intelligence sources](#) and other forces.

Random drug testing

The force has an alcohol, drugs and substance misuse policy that incorporates testing procedures.

The policy allows for random drug testing of student police officers and police officers and staff in specific vulnerable roles.

However, at the time of our inspection, the force didn't carry out any random drug testing. This was surprising, as the force identifies substance misuse as one of its main corruption risks. It is planning to introduce random tests but only for officers in training. The force is missing opportunities to deter substance misuse, identify potential misconduct and provide reassurance to the public.

Police corruption categorisation

The counter-corruption (intelligence) APP lists 12 categories of corruption-related intelligence. Forces should all use these categories when recording intelligence. This will help them identify their biggest corruption threats. It will also provide more accurate data to better inform regional and national analysis of police corruption.

Forces should make sure they accurately categorise all items of sexual misconduct intelligence. For example, forces should only record a sexual misconduct case as [abuse of position for a sexual purpose \(APSP\)](#) if it involves a member of the public.

We found that Thames Valley Police correctly categorised all corruption-related intelligence in line with the counter-corruption APP.

Identifying corruption threats

Counter-corruption strategic threat assessment

The counter-corruption (intelligence) APP states that all forces should produce an annual counter-corruption [strategic threat assessment \(STA\)](#) detailing the corruption threats they face.

In March 2025, Thames Valley Police produced an adequate counter-corruption STA using data from 1 January 2024 to 31 December 2024. It identifies the force's main risks as sexual misconduct and APSP, unauthorised disclosure of information (including computer misuse), substance misuse and inappropriate associations.

It could improve the STA by identifying key locations for corrupt activity and profiling corruptors. And it doesn't identify any emerging corruption risks.

The force has published a redacted version of the STA on its intranet to raise awareness of the current corruption threats. We found that personnel in the [force vetting unit \(FVU\)](#) were aware of the corruption risks identified in the STA, which can inform their vetting decisions.

The force told us that it supplied a copy of its STA to the [regional organised crime unit](#). This helps to inform the national analysis of police corruption.

Counter-corruption control strategy

The force showed us a counter-corruption [control strategy](#). It listed actions the force plans to take to address corruption threats using the [4P-approach](#) – prevent, pursue, protect and prepare.

The control strategy identifies who has responsibility for each of these actions. This means the force should be able to hold individuals to account for completion of this work.

But the control strategy priorities don't exactly mirror those identified in the STA. The force confirmed that it had created the control strategy before the STA was produced. It hadn't completed an up-to-date control strategy with measures to address the specific threats in its latest STA.

Implementation plan

The force should consider each corruption threat identified in the STA in detail. And it should take action taken to address them within set timescales through an implementation plan. The force showed us its implementation plan, which it had incorporated into the control strategy. But again, this plan didn't mirror the threats identified in the most recent STA.

PSD senior managers don't have enough oversight of the implementation plan to monitor progress. And we found that the CCU wasn't using the STA, control strategy and implementation plan effectively to address corruption threats. For example, we found weaknesses in the force's arrangements to tackle some of the main corruption risks it faces. This includes managing sexual-related intelligence, notifiable associations and the drug testing regime, as mentioned in other sections of this report.

The force may be missing opportunities to effectively tackle corruption. This could put the public at risk.

Effective use of a force's STA was recommendation 39 in our 2022 national report 'An inspection of vetting, misconduct, and misogyny in the police service'. At the time of our inspection, Thames Valley Police still hadn't implemented this recommendation. The force should make sure that it is making enough progress.

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-issued 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 several departments often hold relevant information, forces can easily miss corruption risks. Pooling information from a wide range of departments about individuals can be a really effective way of tackling corruption. Forces that don't hold effective people intelligence meetings can't be confident that they are making full use of all the information available to them.

Thames Valley Police has an established people intelligence meeting. The head of the PSD chairs it. Senior managers from the PSD, CCU and FVU attend the meeting along with representatives from HR and legal services. The force holds its people intelligence meeting every six weeks and uses it to discuss police officers and staff who are a concern and those who may pose a corruption threat. Those in attendance agree and allocate actions to mitigate these risks.

In many forces, the PSD has a daily meeting to discuss and assign complaints and [conduct matters](#) reported in the preceding 24 hours. Thames Valley Police holds its PSD senior management team meeting on a weekly basis. We encourage the force to make sure its departmental meeting arrangements allow the PSD, CCU and FVU to promptly share information with each other.

Partnership working to identify potential corruption

The force has developed and maintained working relationships to build trust with external agencies and organisations. This is to support vulnerable people and others who may be at risk of abuse by police personnel. It means the force is more likely to gather corruption intelligence relating to the potential [sexual abuse](#) of vulnerable people by police personnel, helping it to [safeguard](#) potential victims.

The CCU has provided APSP presentations to a range of external agencies, such as [domestic abuse](#) support agencies, children's services and a charitable organisation that supports sex workers. The presentations are designed to help staff in these organisations understand the warning signs of APSP and how to share information with the CCU.

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

Managing corruption threats

Developing corruption-related intelligence and investigations

We reviewed 60 corruption intelligence files. In 55 of them, the CCU responded effectively and used a variety of techniques to develop intelligence. In 18 of the cases, this led to a counter-corruption investigation. In each of these cases, the CCU recorded an investigation plan endorsed by a supervisor.

In most cases, the CCU investigators followed the plan. They carried out all reasonable lines of enquiry before the supervisor finalised the case and signed it off as complete. But we found that the force had missed opportunities to fully develop intelligence and mitigate corruption risks in five cases. These included allegations of computer misuse, a potential vulnerability linked to guidance in the force's social media policy and inappropriate associations. One was a suspected infiltration.

And in a further case, the force had reliable intelligence that a sergeant in the special constabulary had distributed child sexual abuse images. The CCU arrested the officer, but the investigation wasn't thorough enough. It failed to locate the device used and search for the abusive images. As a result, there wasn't enough evidence to consider a prosecution. The force should have acted more promptly and decisively to safeguard children. The force told us that it has changed its protocols around the timing of safeguarding action in child protection cases.

In cases involving [prejudicial and improper behaviour](#), CCU personnel considered that the intelligence may be an indicator of a wider pattern of behaviour. We found three prejudicial and improper behaviour cases where the CCU had extended the reach of its investigation and identified further victims. The force made good use of its IT monitoring capability in these cases. This is encouraging. The force's approach would be further enhanced if the CCU routinely [dip sampled](#) officers' [body-worn video](#) footage. The force should immediately introduce this for such cases.

The force doesn't always refer potential corruption cases to the [Independent Office for Police Conduct](#) in line with [statutory guidance](#). We found three cases that the force should have referred, but it hadn't. The Independent Office for Police Conduct confirmed that the force should have referred all three cases or there should have at least been a pre-referral discussion.

Our overall assessment was that the CCU would benefit from a more formalised structure for its investigation plans. This would help it make sure that supervisors didn't finalise cases before investigators had completed all reasonable lines of enquiry.

Effective use of investigation plans to improve the quality of counter-corruption investigations was part of recommendation 40 in our 2022 national report 'An inspection of vetting, misconduct, and misogyny in the police service'. At the time of our inspection, Thames Valley Police still hadn't implemented this recommendation.

'With cause' drug testing

Where the force has intelligence about drugs misuse, its alcohol, drugs and substance misuse policy allows for 'with cause' drug testing of all police officers and staff. In certain circumstances, the policy allows the force to require individuals to submit up to 3 tests over a 90-day period. The CCU told us that it has adopted a robust stance on 'with cause' testing.

The force told us that over the 3 years before our inspection, the CCU carried out 13 'with cause' drug tests, of which 5 were positive. And in one case, the officer failed to provide a sample.

Ethical interviews

There may be circumstances where forces have lawfully obtained intelligence, but they can't use it in criminal or misconduct proceedings. If the force can disclose the intelligence to the person involved, it may carry out an [ethical interview](#) with them. This gives the individual an opportunity to explain the information. It may also allow the force to implement measures to address any risk or vulnerability to corruption.

The force told us that the CCU sometimes used ethical interviews, often working with the FVU to address unresolved corruption-related concerns. But we saw four examples of CCU investigators not using ethical interviews when it would have been appropriate to do so.

Service confidence

Sometimes forces can't disclose intelligence to the person concerned. This is because disclosure of the intelligence or information is prohibited by law and/or would put investigations, police tactics or people at risk.

A service confidence policy can give forces a framework to manage these situations sensitively and impose restrictions on the individual. A force may prevent an officer from having contact with the public while on duty, for example. The policy should create an appropriate balance between the needs of the force and the rights of the individual. It should include regular reviews and a right of appeal to the chief constable against any restrictions that the force may impose.

Thames Valley Police has a service confidence policy, which is in line with the counter-corruption (prevention) APP. But it hasn't used the policy at any point in the last three years.

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. CCUs then categorise each case as low, medium or high risk.

The types of behaviour that would trigger a force to assess someone against the risk matrix include:

- inappropriate behaviour with or towards colleagues;
- inappropriate sexual comments to colleagues or to the public;
- making a large number of calls or 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.

If a force has assessed an individual as being medium or high risk, they should receive additional monitoring.

The CCU maintains three risk registers to help manage officers and staff who may pose a corruption risk.

One of these registers relates to people who may pose a sexual misconduct risk. The CCU identifies these people through intelligence reports, analytical work, reports of misconduct and information from complaints. CCU personnel research all known intelligence and previous reports on these people. They then carry out a [risk assessment](#) to categorise the level of risk they pose.

But we found that the force had a fragmented approach to its sexual risk register. It is only at the conclusion of any investigation, that the CCU adds people to the register. At this point, the CCU carries out a further risk assessment and sets control measures and review periods. These are typically audits every 2 or 6 months for a 12-month period, depending on the perceived risk.

The decision to delay the implementation of control measures until the force has concluded an investigation is flawed. It may prevent the force identifying corruption risks early enough to intervene effectively. The approach is only justified if it is clear from the outset that the suspect will be suspended without delay and remain so until they are dismissed.

We found five cases where the force hadn't included personnel on the sexual risk register when it would have been appropriate to do so. In two of these cases, investigations had concluded. We also found two concluded PSD cases that the investigators should have referred to the CCU for assessment and inclusion on the sexual risk register, but they hadn't. Finally, we found two cases where CCU personnel had removed the person from the sexual risk register without any clear rationale.

PSD and CCU senior managers should make sure that when intelligence indicates an individual poses a sexual-related corruption risk, they are included on the sexual risk register. And they should make sure they do this as soon as the intelligence is known so that the force can implement any necessary control measures without delay.

Risk assessing and managing all corruption-related intelligence involving sexual misconduct was recommendation 32 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 force should make sure that it is making enough progress against this recommendation.

Another CCU risk register relates to people with notifiable associations and those who may pose other risks, such as drugs misuse or financial vulnerability.

In addition, the force has developed another risk matrix to help it monitor members of the workforce who may be susceptible to potential corruption.

The CCU told us that in March 2022, the force secured funding from the [Police Science Technology, Analysis and Research fund](#). Building on [academic research from Australia](#), the force used this funding to develop a conduct indicator matrix. The force uses this matrix to identify individuals who may pose a future corruption risk. CCU managers can then determine if an intervention is appropriate.

The force told us that by using this matrix, it had identified three officers who required [occupational health](#) referrals and that two officers had been given reflective practice for low-level computer misuse. Another officer had been arrested for serious and prolonged computer misuse. The force told us that it only applied this matrix to a limited number of the workforce because of available analytical resources.

[Abuse of position for a sexual purpose](#)

The force told us that it recognised APSP as serious corruption and routinely provided PSD training sessions to officers and staff. The training has a specific section relating to APSP and includes the warning signs to look out for.

The force uses the [College Learn](#) APSP training package. At the time of our inspection, the force told us that 95 percent of all police personnel had completed this mandatory training. However, we found that some officers and staff were unclear whether APSP referred to both internal and external improper relationships.

[Sexual harassment](#)

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

In line with the [Equality Act 2010](#) and the [Worker Protection \(Amendment of Equality Act 2010\) Act 2023](#), all employers, including police forces, have a legal duty to take "reasonable steps" to prevent sexual harassment and create a safe working environment.

Thames Valley Police has completed a risk assessment relating to sexual harassment. The document includes a series of proposed control measures delegated to named individuals and timescales for review.

[Capacity and capability to investigate corruption](#)

The CCU is a small team of seven experienced investigators, an intelligence officer and a detective sergeant. It is led by a detective inspector and supported by the PSD analyst.

The force told us that the structure of the CCU allowed it to meet the demand it faced at the time of our inspection. The CCU develops potential corruption intelligence and investigates all cases of corruption. It only passes low-level [conduct matters](#) to PSD colleagues for investigation.

But CCU personnel told us that they sometimes pause proactive work due to high workloads. The force recognises that CCU workloads are increasing and that there is limited resilience in the unit. Data provided by the force showed that the number of corruption-related intelligence reports the CCU received increased by 34 percent in the previous year. At the time of our inspection, the force told us that it was recruiting for an additional investigator post. We encourage it to continually review the CCU's resources and workload to make sure it has enough personnel to tackle corruption effectively.

All CCU investigators are [professionalising investigations programme \(PIP\)](#) level 2 accredited. Most have completed the [College of Policing](#) corruption investigators development programme. But CCU managers aren't accredited PIP level 3 [senior investigating officers](#). And they haven't attended the College of Policing corruption leaders' development programme.

CCU officers have a range of experience and skills. Some have backgrounds in protecting vulnerable people, [serious and organised crime](#) investigation and financial intelligence.

Specialist resources

Officers in the CCU, including the management team, are experienced in [covert law enforcement](#). The CCU has good working relationships with the serious and organised crime unit. The CCU has trained two investigators as operational security liaison officers. They work effectively with operational security liaison officers in the regional organised crime units. This informs the CCU's assessment of police corruption risks associated with organised crime groups.

All CCU investigators are trained in surveillance. The force provided examples of the CCU carrying out its own surveillance in support of counter-corruption investigations. When needed, the force can access resources for covert investigations through the regional organised crime units and from other CCUs in the region. However, we found one case where the CCU had missed an opportunity to use covert tactics.

Policies designed to prevent corruption

Clear and concise corruption prevention policies help forces to protect themselves from 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 people who officers and staff 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 doesn't allow officers and staff to have other jobs, interests or activities. Policies should explain how the force will manage any associated risks.

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

The force's corruption prevention policies generally reflect APP guidance. However, we found weaknesses in the way the force was applying some aspects of these policies.

Notifiable associations

The force needs to improve how it manages notifiable associations.

Officers and staff are required to notify the FVU of any notifiable associations using an online form. New applicants may disclose associations during the vetting process. Information about notifiable associations may also come to light through personnel notifying changes in their personal circumstances or as a result of CCU intelligence gathering. Force security officers in the FVU review all notifications, carry out research and record them on the vetting IT system.

The force told us that between 29 May 2022 and 28 May 2023, it recorded 194 notifiable associations. Between 29 May 2023 and 28 May 2024, it recorded 362. And between 29 May 2024 and 28 May 2025, it recorded 382. But without manually accessing every file on the vetting IT system, the force can't identify the proportion of notifiable associations it has assessed as high, medium or low risk.

The force told us that force security officers rarely used a formal risk assessment matrix to help them assess notifiable associations. They mostly rely on professional judgment. And the force doesn't routinely advise line managers about notifiable associations. Instead, it tells individuals to inform their line manager.

And force security officers don't routinely consult the CCU when they are assessing notifiable associations. They only do so in cases with obvious higher risks, such as where the associate has links to serious and organised crime. This means most assessments aren't informed by any CCU intelligence.

At the time of our inspection, the CCU was managing only 14 notifiable association cases using one of its risk registers. For other cases, vetting personnel were carrying out basic audits, rather than trained corruption investigators using specialised IT monitoring. This means the force could be missing some corruption risks.

During our file review, we saw an officer posted to a particular area despite being restricted due to a notifiable association, who was a criminal, living in the same area. The CCU highlighted this to the FVU as a corruption risk, but the officer remained in their post.

Overall, we found weaknesses in the force's approach to managing notifiable associations. This is disappointing given that criminal associations are one of the main corruption risks identified in the counter-corruption STA.

Implementing effective notifiable associations procedures was recommendation 42 in our 2022 national report 'An inspection of vetting, misconduct, and misogyny in the police service'. The force still hasn't implemented this recommendation.

Business interests

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

Members of the workforce requesting approval for a business interest have to complete and submit an application form to the FVU via their line manager. It includes a description of the proposed activity, estimated time commitment and income and any risks to public confidence. Force security officers in the FVU will only consider applications if the officer or staff member has a current performance development review, no misconduct issues, satisfactory attendance and approval from their line manager.

The force's business interests policy doesn't apply to members of the special constabulary or contractors. The force should reconsider this position, particularly as special constables hold the same powers and privileges as regular police officers. Additionally, the business interests policy doesn't apply to officers and staff who wish to take on volunteering roles. A force's business interests policy should cover voluntary work or activities, even if unpaid.

Force security officers authorise business interests. They inform the applicant and their line manager of the decision. Force security officers review authorisations every six months. We examined some business interest applications and found that force security officers recorded only limited rationale for their decisions.

The CCU isn't routinely included in all business interest decisions. This means that in some cases, force security officers may not consider intelligence held on its database before making a decision on the business interest. Corruption-related intelligence should inform every business interest decision.

The force doesn't routinely monitor any conditions applied to the business interest following its authorisation. Nor does it monitor refused applications to make sure the applicant isn't pursuing the business interest regardless. This is a significant corruption risk to the force.

The force told us that between 29 May 2022 and 28 May 2023, it had granted 136 business interests. It declined six applications. Between 29 May 2023 and 28 May 2024, it granted 202 business interests. It declined four applications. And between 29 May 2024 and 28 May 2025, it granted 390 business interests. It declined one application.

Strengthening business interest monitoring procedures was recommendation 41 in our 2022 national report 'An inspection of vetting, misconduct, and misogyny in the police service'. At the time of our inspection, Thames Valley Police still hadn't implemented this recommendation.

Gifts and hospitality

The force's process for monitoring its gifts and hospitality register is ineffective.

The workforce must submit notifications about gifts and hospitality through an online form. On completion, an automatically generated email is sent to the line manager for approval of gifts under £100 or to the head of the PSD if over £100. But line managers can't access CCU intelligence to inform their decisions. Furthermore, the CCU doesn't routinely oversee the register. It only secured access to it in the weeks preceding our inspection.

When we examined the register, we found 141 entries made over 3 years. Every entry indicated that the gifts weren't accepted but other information contradicted this. And there were items approved that were against force policy, such as gift cards and alcohol. Force policy requires the head of the PSD to review the register every six months. This isn't happening. The CCU isn't routinely overseeing the gifts and hospitality register for corruption risks. It should.

Annual integrity and vetting review

The force has a process in place for completing [annual integrity reviews](#) with all officers and staff. The process runs in parallel with annual performance development reviews. This serves as a reminder for personnel to report any changes to their personal circumstances including any notifiable associations or business interests. The force told us that 98 percent of the workforce had completed the most recent personal development review. We were pleased to hear that the force planned to introduce a more comprehensive annual integrity and vetting review procedure in September 2025.

Generally, we found that members of the workforce had a good understanding of counter-corruption policies.

February 2026 | © HMICFRS 2026

hmicfrs.justiceinspectorates.gov.uk