

DECISION NO: PCCG-2013-034

OFFICE OF POLICE & CRIME COMMISSIONER

TITLE: Vetting of Police Officers, Police Staff and Non Police Personnel

DATE: 6th February 2013

TIMING: Strategy and Performance Board

PURPOSE: For monitoring

1. RECOMMENDATION

1.1 For consideration by the Commissioner

2. INTRODUCTION & BACKGROUND

2.1 The Vetting Department was officially set up in 2007 and sits within the Professional Standards Department. It consists of a Vetting Manager and Vetting Assistant. Prior to this Human Resources were responsible for vetting police officers, police staff and non-police personnel.

2.2 In 2007 changes in legislation concerning vetting standards meant that the checks completed prior to 2007 were not compliant with the standards applied today. Previously, staff and officers were only required to complete a national vetting check, namely Counter Terrorism Check (CTC) or a Security Check (SC) clearance. Changes to legislation meant that post 2007 staff and officers were required to be Recruitment Vetted (RV) before they could be granted CTC or SC clearance. RV vetting requires the interrogation of local and national crime recording and intelligence systems as well as an Experian financial check. RV also requires checks on the applicant and their family members.

2.3 The fact that not all staff and officers have been vetted to current standards was identified as a risk and entered onto the force risk register in 2008. To help address that risk a database to manage vetting records was purchased in December 2011.

2.4 During 2012 the vetting department have inputted vetting data onto the new system and to date 85% of vetting records have been transferred. This now enables the organisation to identify who has or hasn't been vetted to the current standards. Gwent Police, like other Forces, has an on-going programme to carry out retrospective vetting of officers and staff.

2.5 The risk identified is being appropriately managed through the Core-Vet system which highlights when a vetting application is due for renewal. For those requiring Management Vetting, the system will also identify when an annual review is due. The current risk assessment as recorded is low.

2.6 At present the vetting department hold approximately 900 vetting records to the required standard for police staff and 745 for police officers. During back record conversion only valid vetting clearances were input onto the system.

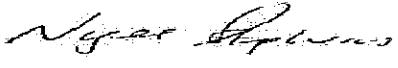
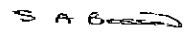
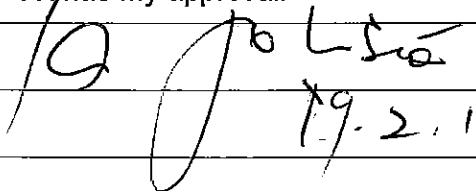
2.7 As well as vetting police staff and officers, the vetting department are also responsible for vetting all non-police personnel. At present, there are approximately 3,000 non-police personnel vetting files to manage. These

	include individuals such as contractors (cleaners, builders, engineers etc.), interpreters and volunteers. Many of these are required to be vetted on an annual basis and receive appropriate priority as they represent the greatest potential risk to the organisation.
2.8	The Force Vetting Manager uses a performance management framework to monitor performance against national standards.
3.	<u>ISSUES FOR CONSIDERATION</u>
3.1	This report is for monitoring purposes as part of the Commissioners responsibility to hold the Chief Constable to account for the provision of an efficient and effective police service in Gwent.
4.	<u>NEXT STEPS</u>
4.1	To comply with the ACPO National Vetting Policy, the vetting department are required to introduce a new vetting level called Management Vetting (MV). This will affect approximately 800 staff members and will focus on the applicant's financial situation and will have a thorough aftercare process. MV has not been implemented previously as there was no effective way of recording and retrieving vetting data. The purchase of the vetting database will enable the effective management of the MV process and adherence to national standards. This will commence in Spring 2013 and is likely to take approximately 12 months to fully implement. Priority will be given to those posts where there is an increased level of risk. Renewal of vetting clearances has already taken place in some departments.
4.2	Introducing Management Vetting will ensure that those in designated sensitive posts are vetted to the appropriate level, thus reducing risk.
4.3	The other vetting processes are on-going and are monitored and managed through a performance management framework. The aim is to ensure that all staff, officers and non-police personnel are vetted to the appropriate level.
5.	<u>FINANCIAL CONSIDERATIONS</u>
5.1	There are occasions when the vetting department is put under increased demand with associated deadlines e.g. times of recruitment, letting of new contracts etc. During these times additional work using overtime can have a financial impact on the organisation.
5.2	Currently Gwent Police has access to a system that enables appropriate vetting checks to be completed 'in-house' for CTC and SC clearances. Access is unlimited for a single annual fee of approx. £1600. This service is due to end imminently and a new service provider will have to be identified.
5.3	Future arrangements will likely require payment for each transaction. Current estimates for this service range between £12 and £70 per check depending on how much additional work is carried out 'in house' and how many checks are carried out per annum which is extremely variable. This in any event is likely to lead to an increase to current service charges. Best estimates show this may vary between £7000 and £40,000 per annum.
5.4	Gwent Police does not currently charge other agencies and contractors for vetting checks for police related activities. With the charges likely to be levied in place of the current annual charge, this will have to be reviewed. There is also scope for income generation for extending this service. This is being

	explored nationally with some Forces already adopting this position.
6.	<u>PERSONNEL CONSIDERATIONS</u>
6.1	The vetting department consists of two people, the Force Vetting Manager and Vetting Administrator and the workload within the vetting department has increased dramatically since the introduction of collaborative working and the requirement to vet contractors on an annual basis.
6.2	The introduction of Management Vetting (MV) will further increase the workload within the vetting department. MV focuses on aftercare and to comply with the National Vetting Policy the Force Vetting Manager will need to conduct annual vetting reviews with those required to be Management Vetted. This in itself will be a timely process and will impact on the overall workload and capacity within the Department.
7.	<u>LEGAL IMPLICATIONS</u>
7.1	In order to comply with protective markings etc. individual must be vetted to a certain level before having access to secret/top secret data etc.
7.2	The Independent Safeguarding Authority (ISA) has insisted that all police officers/staff working with children and/or vulnerable adults are vetted to their standards. This is currently on hold, but it likely to surface again at a later date. This is likely to be a legal obligation with a large fine if not adhered to.
8.	<u>EQUALITIES AND HUMAN RIGHTS CONSIDERATIONS</u>
8.1	The vetting policy has been considered against the general duty to promote equality, as stipulated under the Single Equality Scheme and has been assessed not to discriminate against any particular group. Consideration has been given to requirements of the Articles contained in the European Convention on Human Rights and the Human Rights Act 1998 in preparing this report.
8.2	Consideration has been given to requirements of the Articles contained in the European Convention on Human Rights and the Human Rights Act 1998 in preparing this report.
9.	<u>RISK</u>
9.1	If people remain un-vetted there are a number of potential risks to the organisation. These include: <ul style="list-style-type: none"> • Staff having access to information/buildings they shouldn't have access to. This could lead to breaches of the Data Protection Act. • Risk of corruption/infiltration. • Breach of legal responsibilities • Inability to effectively manage risk if not identified. Other risks identified include; <ul style="list-style-type: none"> • Increased costs associated with checks • Resilience within the vetting department

	<ul style="list-style-type: none"> • The cost and impact should the ISA require vetting all staff with access to children and vulnerable adults (see section 7 above). • Current risk is assessed as low
10.	<u>PUBLIC INTEREST</u>
10.1	This document has been assessed as being suitable for publication.
11.	<u>CONTACT OFFICER</u>
11.1	Detective Superintendent Warrender, Head of Professional Standards
12.	<u>ANNEXES</u>
12.1	None

For OPCC use only

Office of the Chief Constable	
I confirm that this report - Vetting of Police Officers, Police Staff and Non Police Personnel - has been discussed and approved at a formal Chief Officers' meeting. It is now forwarded to the OPCC for monitoring purposes .	
Signature: 	
Date: 15 February 2013	
	Tick to confirm (if applicable)
Financial The Treasurer has been consulted on this proposal.	√
OPCC (insert name) The Chief Executive has reviewed the request and is satisfied that it is correct and consistent with the PCC's plans and priorities.	√
Legal The legal team have been consulted on this proposal.	N/A
Equalities The Equalities Officer has been consulted on this proposal.	N/A
Chief Executive/Deputy Chief Executive:	
I have been consulted about the proposal and can confirm that financial, legal, equalities etc... advice has been taken into account in the preparation of this report. I am satisfied that this is an appropriate report to be submitted to the Police and Crime Commissioner for Gwent.	
Signature: 	
Date: 15/02/13	
Police and Crime Commissioner for Gwent	
I confirm that I have considered whether or not I have any personal or prejudicial interest in this matter and take the proposed decision in compliance with the Code of Conduct. The above request has my approval.	
Signature: 	
Date: 19.2.13	