

**Report of the Chief Constable to the Chair and Members
of the Human Resources & Diversity Panel
8th October 2009**

Executive & Presenting Officer: Mr Derek Bonnard, Deputy Chief Constable

Status: For Approval

Force Vetting Officer

1. Purpose

- 1.1 The paper presents a business case for the creation of a new post of Force Vetting Officer, and asks Members to approve the prioritisation of funding for the creation of this essential police staff post.

2. Recommendations

- 2.1 That the contents of the report be noted.
- 2.2 That the application for a Force Vetting Officer be approved.

3. Reasons

- 3.1 Of fundamental importance to the effective operation of Cleveland Police is that its officers and staff act responsibly and honestly. This applies equally to other individuals, such as contractors and consultants, who are provided with access to the Force's sensitive information and facilities. The background checking of persons is the first line of security the Force take to enable any risk individuals pose to be identified and mitigated.
- 3.2 The ACPO Vetting Policy created an understanding of the principles of vetting and thereby established uniformity in vetting procedures. It was envisaged that forces would adopt a consistent approach to vetting in accordance with the measures outlined in the national policy. The policy also recommends that both National Security and Force Vetting procedures should be co-ordinated

within a central unit and that forces should designate a 'Force Vetting Officer' (FVO) as a 'single point of contact' with sufficient support to administer all aspects of vetting.

- 3.3 It is important to note that throughout the ACPO policy there are many references to the Force Vetting Officer, a post that Cleveland currently does not have but most other Forces employ. In terms of the North East Region, Cleveland is only Force without this full time post.
- 3.4 Responsibility for vetting currently sits across several different service units namely: Professional Standards; Crime (Special Branch), and People & Diversity (current policy owners). At present a multitude of different processes are in operation and no one service unit has ownership of the function. The checking and collation of relevant information is completed by the Vetting section of the Information Compliance Unit within Professional Standards Department. In addition vetting review procedures currently do not exist within the Force.
- 3.5 To address these issues would necessitate increased vetting activity, which in turn would require effective control mechanisms. This supports the proposal and recommendations for a centralised approach to vetting, which would improve control, ensure consistency and, through economies of scale, offset some of the additional costs that the increased vetting workload would represent. The current practice places an over-reliance on initial vetting action, with little consideration for the fact that the circumstances of vetted individuals can change over time.
- 3.6 In early 2009 the Force Operational Performance Team (OPT) completed a review of Force Vetting Arrangements. The outcome of the review was 15 recommendations one of which was the appointment of a Force Vetting Officer (FVO) to manage the vetting functions and act as the dedicated decision maker. This will ensure consistency and policy compliance.
- 3.7 Out of the remaining 14 OPT recommendations, 9 will be directly affected by the Force employing or not employing a FVO.
- 3.8 Independent Safeguarding Authority (ISA)
The establishment of the ISA is the joint departmental response to Sir Michael Bichard's recommendation (19) that requires those who wish to work with children, or vulnerable adults, to be registered.
- 3.9 The Safeguarding Vulnerable Groups Act provides the legal framework for the new scheme which will reform current vetting and barring practices. These new arrangements require those who wish to work with children, or vulnerable adults, to be registered. The register would confirm that there is no known reason why an individual should not work with these client groups.

- 3.10 It is important to recognise that this wider remit will incorporate a number of designated police posts that will have to be notified e.g. Custody office personnel, Child protection officers, officers working with schools etc. In short any activity which involves contact with children or vulnerable adults and is of a specified nature (e.g. teaching, training, care, supervision, advice, treatment or transport) frequently or intensively and/or overnight.
- 3.11 As such it will be important for the Force to keep these roles and personnel who perform these roles under review to ensure compliance with the Act. In addition there will have to be a monitoring and maintenance regime in relation to the movement of personnel in and out of those roles to also ensure compliance.
- 3.12 HMIC
In 2005 a baseline inspection took place. The professional standards section of the inspection included measures addressing personnel vetting and security. The recommendation made to the Force at that time was to review vetting activities and processes to address shortfalls within the system.
- 3.13 The HMIC intend to inspect Professional Standards department in 2009 and part of that Inspection, will cover vetting procedures. The main question will be in relation to ensuring staff are vetted to the appropriate level commensurate with their post.
- 3.14 Internal Audit.
Bentley Jennison have recently conducted an audit of the vetting function within the Force, and it is expected that the outcome of that audit will contain the same / similar recommendations as the review conducted by OPT.
- 3.15 Volume of Work
During 2008 in excess of 8000 vetting checks were completed by Cleveland Police. At the latter end of 2008 backlogs reached a high of almost 3000 applications resulting in the Force employing several agency staff to deal with the outstanding work. All of those agency staff have now been released.
- 3.16 To date, within 2009, in excess of 2500 vetting checks have been completed. Backlogs are now at a manageable level, however it should be noted that additional work, normally carried out by the vetting team, on Children and Family Court Advice and Support Service (CAFCASS) applications, is currently being conducted by a member of staff temporarily employed by that organisation. While negotiations remain ongoing, it is likely that funding for that person will shortly run out and the work will inevitably return to the vetting team, (CAFCASS backlogs are currently at over 600 applications).
- 3.17 The employment of a Force Vetting Officer should be seen as part of a package that will create more secure and efficient processes. An action plan to deliver improvements has been already developed in line with the OPT

recommendations and current ACPO guidelines. The main functions of a Force Vetting Officer are attached at Appendix A

4. Implications

4.1 Finance

The overall cost of the proposal would be £34,807 - £43,198 (including on-costs) depending on the salary point of the appointed individual.

4.2 Diversity & Equal Opportunities

There are no diversity or equal opportunity implications in this report

4.3 Human Rights Act

There are no Human Rights Act implications arising from this report.

4.4 Sustainability

This report represents some major changes to the structure of the current Professional Standards Department vetting to facilitate ongoing business development. Funding will need to be available on an ongoing basis to ensure the activity is sustained in the future.

4.5 Risk

There is a reputational risk to the Force and the Authority if the correct vetting procedures are not adhered to. The appointment of a Vetting Officer will mitigate this risk.

5. Conclusion

5.1 The Force should employ a Force Vetting Officer for the following reasons:

- To ensure any current vulnerabilities are addressed by introducing robust structures and processes that are capable of addressing initial and subsequent reviews of vetting;
- Compliance with current ACPO policy/guidelines;
- To comply with previous and almost certain future HMIC recommendations;
- To maximise the Force position in managing and dealing with future issues such as Independent Safeguarding Authority requirements;
- To recognise and implement recommendations from the internal OPT review of current systems that are likely to be repeated by external auditors in the near future.

Sean Price
Chief Constable

Main Functions of the Force Vetting Officer

- Manage security vetting; ensure that national vetting standards are met; constitute the Force vetting liaison point; and to personally undertake vetting duties relating to sensitive roles
- Responsible for the production of a revised and expanded Force Vetting Policy to include the following requirements; Security Clearance, Criminal Records and Financial Vetting Policy for Recruitment
- Responsible for the overall line management of the vetting section of the Information Compliance Unit.
- Enable mandatory requirements from the National Vetting Policy to be implemented.
- Responsible for regularly reviewing roles within the Force that require a greater level of vetting than that currently given. Ensuring that the correct vetting level is recorded against every role within the Force enabling the appropriate vetting level to be applied at initial recruitment, and reviewed on any change of role or upon promotion.
- Responsible for maintaining Management Vetting levels within Force, as specified by the National Vetting Policy, to improve assurance that any vulnerability, relating to holders of sensitive posts, are identified and effectively addressed.
- Introduce audit procedures relating to both information-gathering and decision-making, to ensure that vetting procedures are applied robustly, uniformly, and without compromise.
- Responsible for a comprehensive proactive and reactive approach of vetting procedures within the Force ensuring compliance with national policy. The guidelines contained within the Manual of Protective Security form the basis for these procedures, in order to ensure that the approach adopted complies with the Government Protective Marking Scheme.
- Ensure processes are in place to prevent individuals gaining unsupervised access to Force premises and facilities without having been security vetted.
- Provide full documentation of the elements required for each security vetting level, in compliance with the Government Protective Marking Scheme
- Introduce and maintain the Management Vetting level, in addition to other procedural recommendations contained within the National Vetting Policy for the Police Community
- Incorporate the decision-making guidelines contained in the Home Office circular 'National Recruitment Standards – Eligibility Criteria for Police Recruitment and

Appendix A

Consistent Recruitment Practices' where appropriate and these guidelines are extended to apply to police staff and third parties, in addition to police officers.

- Introduce minimum required procedures on auditing of information-gathering and decision-making.
- Produce and review full guidance on required proactive and reactive review procedures.
- Ensure vetting levels are reviewed on any role change or promotion.
- Implement and review an electronic database that will be available across the Force IT network, to indicate third parties who have been successfully security vetted, and those who have specifically failed vetting.
- Ensure that all staff involved in authorising third party access to Force premises, facilities and sensitive information are made aware of the requirement to refer third parties for vetting before unsupervised access is provided.