



Report of the Police and Crime Panel

Report title: Central Vetting Unit

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Purpose of the report: Briefing to members

Recommendations: (Briefing only)

Introduction

This report outlines the current central vetting unit; highlighting structural change, current work streams, current risks, and horizon planning. A Glossary is included to help clarify a number of policing acronyms used throughout the report.

Staffing

Recruitment of new starters

Following the review of resourcing within vetting, we have made a number of temporary roles within the department permanent (5 vetting advisors and 1 vetting administrator) and experienced additional growth (8 vetting advisors, 1 force security advisor and 1 vetting administrator).¹ These additional staff have now been in post since 01/04/2023.

Whilst the addition of new vetting staff has been extremely beneficial to support the demand, it should be highlighted that it takes approximately 6-weeks to become competent in understanding the vetting systems and processes when carrying out vetting checks, we are therefore only starting to fully realise these benefits from w/c 22/05/2023.

New structure

This growth has enabled the unit to follow a 4 strand structure; Courses, Compliancy, Counter Terrorism and Trays, managed by 4 senior vetting advisors. This structure has enabled force critical work to be maintained. It also allows flexibility between work strands to better support surge demand.

Demand vs Capacity

There is currently a mechanism in place that ensures all new employees (who are booked onto initial training courses) are prioritised. This includes: Police Officers, PCSO's, Specials, Contact Management, Detention Officers, Police Contact Enquiry Centre Officers and Firearms Officers. As we can forecast our demand in these areas, we can allocate

¹ There are currently 3 vetting advisor vacancies.



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appropriate resources throughout the year. This mechanism ensures that there are no delays and vetting are compliant with the SLA's in all these areas.

There are also dedicated resources ensuring that CTPSE based roles, ICT, Assessment Investigation Unit and Forensic staff are vetted as priority files. We are compliant with SLA's in all these areas.

Vetting Success

Courses

The courses team (of 9 vetting advisors) are responsible for the following areas of work;

- Police recruits (IPLDP, DHEP, PCDA, Police Now, Transferee's, Re-joiners and DC DHEP)
- PCSO recruits
- Specials recruits
- Detention Officers
- Contact Management
- Police Contact Enquiry Officers
- Firearms Officers

This work stream has been considered as the highest priority within the vetting team and where courses have been identified as low in numbers, resources have been pulled from other areas of the vetting team to support and facilitate (where possible) filling the courses with successful candidates.

Since the commencement of the Police Uplift Programme, there has been consistent communication between SPOC's and any early identification of issues has been communicated effectively. This relationship between stakeholders is working well.

CTPSE/SEROCU

The South East team experienced a 2 post growth in September 2022. This has enabled them to reduce their backlogs and are now functioning within SLA targets. The team are able to monitor any incoming vetting requirements and are currently able to focus on the requirements around annual reviews. The team are also ensuring there is compliancy around legacy vetting records and are in the process of piloting new automation within their aftercare projects.

Whilst this is all being maintained, the team have been fortunate to support the TVP workloads in supporting any tray backloads or supporting in periods of low resilience (recent sickness and annual leave).

Project work *Assessment Investigation Unit, Forensics and ICT*

Dedicated resources have ensured that we have consistently provided an exceptional service with no delays in relation to force critical changes to departments and support functions. This includes the initiation of the assessment and investigation unit (AIU), consistent delivery for all new ICT roles, and the current development of the forensics department.



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Fixed Term and Temporary Contracts

There is a reduced 10 day service level agreement (SLA) for all fixed term and temporary contracts to be picked up within vetting. We are currently maintaining these SLA's, where vetting checks allow², This supports short terms business critical roles being brought into the organisation.

Compliance

The compliance team have recently grown in size and therefore have been able to work in line with HMIC and APP requirements in not only bringing applications in line with outlined requirements, but renew expiring clearances. There is a monthly roll out that captures all expiring staff and officer roles and this is currently up to date in capturing all changes in circumstances, role changes whilst providing new clearances.

Owing to the success of the compliance team, they have begun to take on additional work streams including the Historical Data Wash support (outlined below), supporting internal recruitment with retrospective vetting, and are due to implement a new project of managing the responsibility of all change in circumstance notifications and conditional clearance management.

Current Backlog

Traditionally the area there are the most delays are general recruitment and contractors. This is because resources have been reallocated elsewhere to force critical roles. At the end of the financial year 2022/23 there was a 19-week delay.

Currently, we are working to a clear by date of 06/03/2023, a 13-week delay on service level agreements for these areas of vetting. Now that the new starters have completed their initial training, this delay is expected to reduce.

The current backlog is 163 files. The backlog by file type is illustrated below, highlighting the area of greatest backlog still falls with Non-Police Personnel Vetting (Contractor) applications with 71% of the applications.

File Type	Total in backlog	Percent
Contractors	116	71%
Staff	24	15%
Police	16	10%
Volunteers	6	4%
Specials	1	1%
Grand Total	163	

² ie subject to the information being available within that time frame.



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Targeted approach

Whilst the clear-by date is still daunting for the organisation, there has been a targeted approach with regards to the types of file that are being actioned; this includes a focus on Non-Police Personnel Level 1 (NPPV1) clearances, a total of 266 files have been processed since March with the backlog reducing from over 200 to 80.

The number of files per month in the backlog is shown below. A significant portion of the backlog in April and May are likely to be a direct result from the awarding of new contracts of contractors by procurement. There are now 10 vetting advisors focused on reducing this backlog and using the vetting profiler, we could assume that the March applications would be cleared within the next 2-weeks.

	March	April	May	June	Total
Total Applications	21	56	72	14	163

Risk Management

Where risks defined by the College of Policing APP on Vetting have been identified through the police vetting process within the central vetting unit, risk mitigations will be considered to determine whether police vetting clearance can still be granted, but with management activities in place. This is reviewed intermittently during the course of the individual's clearance.

Applications meeting the above criteria are referred to as conditional clearances, and have been monitored since 14/10/2021.

The most common risks being managed in the force are in relation to an individual's finances and associations (32% and 28% of all conditional clearances respectively). These are often managed by means of a collaborative approach with the applicant, counter corruption and Head of Department. In addition to this, risk mitigations such as periodic system auditing, proportionately restricting systems access, facilitating geographical or departmental restrictions, providing specific risk management and welfare advice or exploring options openly with the vetting applicant may be imposed.

The management of conditional clearances is an ongoing requirement that must be factored into vetting advisor responsibilities; this is only set to increase with the current global climate and number of additional roles being filled.

Unsuccessful Vetting Applications

Rejections

Where risks defined by the College of Policing APP on Vetting have been identified through the police vetting process as too high and risk mitigation cannot be put in place, clearance will be refused.

When evaluating the completed applications during the financial year 2022/23, for Police, Specials and PCSO's, there was a total of an 11% failure rate for new applicants.



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	Pass		Fail	
	# Passed	%	# Failures	%
Police	876	90%	100	10%
Specials	45	78%	13	22%
PCSO's	38	84%	7	16%
Total	959	89%	120	11%

The type of vetting failure has been monitored since 14/10/2021 therefore identifying common rejection failures can be considered. Looking at the failures identified above, the most common [Disclosable] reason for refusals were:

Risk Refusal Reason	Sum	% of total
Convictions etc.	14	11%
Integrity	6	5%
TAINT	6	5%

Withdrawals

Applicants that are unsuccessful during another part of the application process are withdrawn from the vetting process; this could be before, during or after checks have been completed. As per the below, 14% of all applicants were withdrawn from vetting in the financial year 2022/23.

	Fail	Pass	Withdrawn
Grand Total	120	959	174
%	10%	77%	14%

The rejections and withdrawals ultimately take time to process, therefore it is important to consider ways that efficiency savings can be made. In order to create capacity, work is underway for a collaborative approach with people services for support at the front end of the recruitment process. Education to prospective applicants will support in managing expectations whilst deterring those that are unlikely to pass the vetting process.

Vetting Code of Practice

Following instruction from the Home Secretary, the Vetting Code of Practice was reviewed and updated in February 2023. The revised Vetting Code of Practice was submitted to public consultation in March 2023, has been passed through the College of Policing governance boards and is now sat with the Home Office for approval and sign off by the Secretary of State. There are no timescales as to when this will implemented and published.

HMIC recommendation progress

Following the [HMICFRS An inspection of vetting, misconduct, and misogyny in the police service](#) report dictates a number of recommendations that should be implemented within vetting units nationally.



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There were a total of 43 recommendations made and 5 areas for improvement delivered to both vetting units, professional standards and counter corruption units. Thames Valley Police RAG Status has been defined as green on 8 of the vetting recommendations, and amber on 2 (recommendation 7 and recommendation 41). In respect of the AFI's it must be noted that there are 1 RAG as amber (AFI 1) and 1 RAG as red (AFI 2).

Recommendation 7 RAG Status *Amber*

By 31 October 2023, chief constables should introduce an effective quality assurance process to review vetting decisions, including routine dip sampling of:

- rejections; and
- clearances where the vetting process revealed concerning adverse information.

Four additional staff have been recruited in to the Compliancy and Aftercare Team and will add this to the requirement of their role thus enabling the dip check process.

Recommendation 41 RAG Status *Amber*

By 30 April 2023, chief constables should strengthen their business interest monitoring procedures to make sure that:

- records are managed in accordance with policy and include cases where authorisation has been refused;
- the force actively monitors compliance with conditions that are attached to the approval, or where the application is refused;
- regular reviews of each approval are carried out; and
- all supervisors are properly briefed about business interests held by members of their teams.

Following the introduction of an additional force security advisor, plans were put in place for more proactive monitoring, however we have now had a resignation in this area so will be temporarily back down to one staff member. Priority will be keeping on top of current applications, but once we have recruited again the plan will be put back in place.

Area for Improvement 1 RAG Status *Amber*

Forces' use of vetting interviews is an area for improvement. In more cases, forces should interview applicants to explore adverse information of relevance to the case. This should help with assessing risk. When they carry out such interviews, forces should maintain accurate records and give copies of these to interviewees.

With the increase in permanent vetting staff, vetting interviews are now conducted on a more regular basis and can be conducted via phone, teams or face to face.

Area for Improvement 2 RAG Status *Red*

Automated links between force vetting and HR IT systems are an area for improvement. When specifying and procuring new IT systems for these purposes, or developing existing ones, forces should seek to establish automated links between them.



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Currently there is no capability for HR and PSD or Vetting systems to share information. A new version of our existing HR database is being scoped and vetting will be a key player in this to further consider automation and identification of roles and vetting levels. This is a long term project and will not deliver a solution imminently.

Anticipated APP on Vetting updates

In addition to the chief constable recommendations within the [HMICFRS An inspection of vetting, misconduct, and misogyny in the police service](#) report, there were a number of recommendations to the College of Policing and NPCC in regards to changes within the [APP on Vetting](#).

Expected changes, associated with the HMICFRS recommendations are:

- (For recruitment) As a minimum, pre-employment checks should obtain and verify previous employment history for at least the previous five years (including dates of employment, roles carried out and reason for leaving); and verify the qualifications the applicant claims to have.
- APP on Vetting will encourage a greater focus when assessing the threats and risks for vetting decisions, on: protecting the public, risk mitigation factors that could be employed locally and applying more weight to adverse information found on social media.
- Guidance will be provided on the composition of vetting appeal panels.
- It will be expected that TVP undertake a vetting review on any serving personnel who have been declined vetting clearance on a transfer to another force, as well as reciprocate a notification to a force TVP decline clearance for a transferee, passing all information obtained through the vetting process.
- TVP will need to ensure personnel, role and vetting details are monitored through a central system, where designated posts and position holders are easily identifiable and their vetting status is easily reportable and maintained.

We have recently been asked to provide data to the College of Policing in regards to the volume of applications at each vetting level we are maintaining, the processing times and cost of vetting staff, as they will present evidence of the resource and cost impact changes in vetting clearance periods will have across England and Wales, for an evidence informed decision to take place.

Additional proactive personnel security measures may be mitigation factors in regards to the length of clearance periods, such as the use of PND to identify any new traces on personnel and annual integrity reviews (both under the CCU strand).

Historic Data Wash (HDW)

On 18th January 2023, the Home Office announced that all police forces must check their workforce against national databases to identify if anyone had 'slipped through the net.' A threat was identified through a high profile case that significant police information has been



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missed during an individual's employment. This can lead to a reduction in confidence by the public in the police service and the purpose of the vetting process.

This led to the immediate HDW process; carried out by TVP counter corruption unit, with support from TVP vetting. There are currently 65 referred cases to vetting; the compliancy team have an action week (w/c 05/06/2023) to decipher the information and identify and manage additional risks that have been identified.

Horizon Scanning

When reviewing the current demands on the vetting unit, the table below highlights a number of areas that have, and will continue to increase demand over the next 12 months.

HMIC	<ul style="list-style-type: none"> ➤ Renewals process ➤ Detailed accurate statistics ➤ Measuring disproportionality in Vetting ➤ Decision making and rationale recording
Vetting Code of Practice	<ul style="list-style-type: none"> ➤ This is identified above in its own entity
Authorised Professional Practise	<ul style="list-style-type: none"> ➤ This is identified above in its own entity
Uplift	<ul style="list-style-type: none"> ➤ Increase in course intakes; number of courses and number of applicants ➤ Facilitating support staff ➤ Backfill of internal moves (i.e. PCSO's/Staff to Officers) ➤ Ongoing aftercare for risk managed clearances – conditional clearances being made to help speed up processes ➤ Renewals in the future
National Security	<ul style="list-style-type: none"> ➤ Changes within UKSV (the national security vetting provider) and new IT systems.
Statistical requirements	<ul style="list-style-type: none"> ➤ Scrutiny requires more transparency, requiring more statistical and analytical information
Complexity of cases	<ul style="list-style-type: none"> ➤ With further checks needed as defined by APP, results are becoming more complex, social media, and no one case is the same and treated on its own merit.
Risk Management	<ul style="list-style-type: none"> ➤ With an increase in workforce comes an increase in the number of clearances to be managed, in particular, those with conditional clearances requiring additional support / mitigation strategies.
Violence Against Women and Girls	<ul style="list-style-type: none"> ➤ Decrease in risk appetite ➤ Facilitating decision making and more collaborative working and sharing case studies ➤ Greater scrutiny around decision making
Core-Vet Version 5	<ul style="list-style-type: none"> ➤ This is the migration to a cloud based server and will affect delivery. ➤ The migration will involve a period of time in which Core-Vet will be unavailable. The duration of this period is currently



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	undefined. Contingency planning is currently underway as for vetting services there will be a delay and may necessitate back record conversion of files and decisions made during the period Core-Vet is offline.
CTPSE	➤ The future of CTPSE Vetting and where this sits within the organisation is still under review.



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Glossary

AFI – Areas for Improvement (HMICFRS)

AIU – Assessment and Investigation Unit (TVP)

APP – Applied Policing Practice (College of Policing)

CCU – Counter-Corruption Unit

CTPSE – Counter Terrorism Policing South East

DCDHEP – Detective Constable Degree Holder Entry Programme

DHEP – Degree Holder Entry Programme

HDW – Historical Data Wash

HMICFRS – His Majesty’s Inspector of Constabulary and Fire & Rescue Services

IPLDP – Initial Police Learning and Development Programme

NPCC – National Police Chiefs Council

PCDA – Police Constable Degree Apprenticeship

PCSO – Police and Community Support Officer

PND – Police National Database

PSD – Professional Standards Department

SLA – Service Level Agreement

SPOC – Single Point of Contact

TAINT – ‘Tainted’ Procedure (Force Operational Guidance)

TVP – Thames Valley Police