



BEDFORDSHIRE POLICE AUTHORITY

Vetting Policy

REFERENCE NUMBER : **BPA 08**
RELATES TO PROCEDURE NO :
NEW or REVISED POLICY : **New**
Revises Policy Titled :
Revision History :
POLICY OWNER (Dept) : **Bedfordshire Police Authority**
POLICY AUTHOR (Job Title) : **Chief Executive/Treasurer**
IMPLEMENTATION DATE : **July 2009**
REVIEW DATE : **July 2011**

POLICY

1. The Police Authority supports and applies the ten principles of public life as set out in Appendix A to this document. The Authority believes that in conducting its activities, it should be as open as possible and should only restrict information, both to members of the Authority and to the public, when the wider public interest clearly demands. The Authority also recognises that it has a public interest duty to ensure the appropriate security of police and government assets and information which, if disclosed, could lead to, or support, criminal activity. This Vetting Policy has full regard to these issues and principles.
2. The policy does not apply to Police Officers, nor to the employees of the Authority who are under the direction and control of the Chief Constable, since they are subject to the Chief Constable's and Force vetting procedures.
3. The policy will allow the Authority to:
 - exercise robust and effective governance of policing
 - ensure that it meets its statutory duties, which include:
 - ensuring the delivery of an effective and efficient police service
 - holding the chief constable to account
 - secure continuous improvement in the delivery of policing services
 - maintain the trust and confidence of communities, individuals and the Force
 - ensure the appropriate security of police and government assets and information, and prevent operational compromise
4. The Policy applies to:
 - members of the Bedfordshire Police Authority
 - staff employed by the Authority who are not under the direction and control of the Chief Constable
 - persons working with the Authority who require access to police premises without constant supervision
 - persons working with the Authority to assist it in meeting its statutory duties

5. The following principles will apply:

- Need to know
The dissemination of sensitive information and assets should be no wider than is necessary for the efficient and effective conduct of the Authority's business and should be limited to those individuals who have a need to have access to that information and assets, and who are appropriately authorised to do so.
- Ownership of acquired or derived knowledge or information ("intelligence") Such intelligence remains the 'property' of the originator who may impose conditions on the way in which it is handled, actioned and to whom it is disclosed. Only the originator of a 'protectively marked' asset may authorise a change in protective marking.
- Specificness
The context, detail and origin of acquired or derived knowledge or information ("intelligence") will determine the protective marking, the required vetting status of recipients and the extent of disclosure.
- Proportionate
The application of this Policy will be proportionate to the nature of the work being undertaken and to the level of access required, whether to premises or information.

6. There are two types of vetting carried out by the Force, through the Beds and Herts Vetting Unit:

- Police vetting (Police assets)
- National Security vetting (Government assets)

Each type has a number of different levels:

- Police vetting
 1. Recruitment vetting (includes Basic Check)
 2. Non Police Personnel Vetting (NPPV) (abbreviated and full, includes Basic Check)
 3. Management vetting (includes a Financial Check).

NB:-A Basic Check will allow regular access to Police and Government RESTRICTED and CONFIDENTIAL assets on a need to know basis.

- National Security vetting (Government assets)
 1. Counter Terrorist Check – Includes a Baseline Standard check and a check against national security records. In isolation, a Counter Terrorist Check (CTC) does not allow access to, or knowledge or custody of, protectively marked assets. However, the Baseline Standard procedure must be completed prior to initiating a CTC clearance and therefore will allow access to RESTRICTED and CONFIDENTIAL Government and Police assets.
 2. Security Check – Includes a Baseline Standard procedure and CTC, plus checks against National security records and a financial check. If clear, such checks allow frequent and uncontrolled access to Government SECRET assets and occasional, controlled access to TOP SECRET material.

3. Developed vetting – Includes a CTC and SC together with the completion of a supplemental questionnaire, a financial check, checking of references in writing, by telephone or by interview from personal friends, tutors and employers as appropriate and a detailed interview with the person needing the security clearance, conducted by a vetting officer. Such checks are needed for clearance for long term access to Government TOP SECRET assets.

Aftercare Vetting [includes Police and National Security]

The term “aftercare” means that vetting whilst is initially a snapshot in time, is not a one off event. Subsequent vetting may be conducted when an individual’s personal circumstances change, or if adverse information comes to light, or at a specific renewal/review periods. It is the individual’s responsibility to inform the Beds and Herts Vetting Unit of their changes in personal circumstances. Eg: Change of/in name, partner, family, financial status, criminal association, misconduct, any situation which may make an individual susceptible to criminal or terrorist influence/vulnerability (includes allegations of any of the above).

7. All members, and the staff employed by the Authority who are not under the direction and control of the Chief Constable, will be subject to NPPV checks, in that Police National Computer checks, local intelligence checks, spouse/partner/family and those residing at the home address checks and Special Branch checks will be undertaken. Financial checks are not normally required.

It is envisaged that this procedure would cover all members of staff employed by the Police Authority.

In order to ensure appropriate oversight the following enhancements are required:

Authority Staff

The Chief Executive/Treasurer requires NPPV and Security Check clearance. All other Authority staff will require NPPV clearance (abbreviated or equivalent).

Authority Members

Based on the principle of proportionality all members require NPPV clearance (abbreviated or equivalent). However, in order to ensure appropriate oversight the following enhancements are required:

Chair requires NPPV and Security Check clearance.

Protective Services Lead members require NPPV and Security Check clearance.

Protective Services Counter Terrorism Lead member requires NPPV, Security Check and Counter Terrorism Checks. This member has regular oversight of counter terrorism and extremism.

Independent Representatives of Standards Committee

Independent representatives will require NPPV clearance (abbreviated or equivalent).

Independent Custody Visitors (ICVs)

There are approximately 30 ICVs across the county. Newly appointed ICVs will require NPPV (abbreviated or equivalent) clearance. All existing ICVs have been subject to Basic vetting checks and it is proposed that the NPPV vetting can be undertaken at the ICVs next review date. There are four ICVs who have been vetted to a higher level, including Security Checks and Counter Terrorism Checks to allow custody visits to be undertaken to those detained under CT legislation.

8. In addition to the above, (a) persons applying for employment with the Authority and who, if appointed, would not be under the direction and control of the Chief Constable and (b) persons who are not members or staff employed by the Authority but will be working in partnership with the Authority e.g. consultants, will be subject to the relevant level of vetting in accordance with the principles of this Policy before an offer of employment is confirmed or a contract is completed, as appropriate.
9. All Authority vetting will be conducted by the Bedfordshire and Hertfordshire Professional Standards Department through their Vetting and Disclosure Unit, through appropriate bespoke procedures, and all vetting papers and resulting information will be held securely by the Vetting and Disclosure Unit.
10. All persons subject to vetting requirements will be notified that vetting is to be undertaken and that each will be notified in due course once vetting clearance has been granted. Where vetting clearance has not been granted, or where limitations are placed on a clearance, the person will receive written notification thereof and, where possible, provided with an explanation. Normally an explanation can be provided however there may be circumstances which prevent an explanation being provided. The person so notified may, within 14 days of receipt of the written notification, request an appeal to review the decision. The Chief Executive and Monitoring Officer to the Authority, in consultation with the Chief Constable [normally represented by the Vetting & Disclosure Manager], will review the decision and provide a written statement outlining the result of the decision. The appeal process may include an exchange of communication between the Police Authority CEO/Chair, the Individual and the Chief Constable [normally represented by the Vetting & Disclosure Manager] to determine individual circumstances or to clarify details. The decision reached will be final.
11. Where a member of the Authority is not granted clearance, or where limitations are placed on his/her clearance, in addition to notification under paragraph 10 above, the Chief Executive to the Authority, in consultation with the Chief Constable [normally represented by the Vetting & Disclosure Manager], will determine any limitations that might need to be applied to the work of that member. The Police Authority (Chair, Vice-Chair, Chief Executive and Monitoring Officer) reserve the right to remove a member of the Authority if the limitations applied prevent the member from being effective. The Chief Executive will provide written notification of such determination to the member in question. A member can ask for this determination to be reviewed within 14 days of receipt of the written notification. The Chief Executive and Monitoring Officer, in consultation with the Chief Constable [normally represented by the Vetting & Disclosure Manager] and the Chair and the Vice-Chair of the Authority, will review the determination and provide a written statement to the member outlining the result of the review. The decision reached on such review will be final.
12. Documents used during the vetting process will be retained in a secure environment by the Vetting and Disclosure Unit. Information contained in any questionnaires will be held in confidence and will not be disclosed other than for the purpose as set out in the vetting forms. Documents and information held by the Authority for the purposes of the application of this Policy will be retained in accordance with the retention and disposal policies and under Data Protection and Human Rights legislation.

FREEDOM OF INFORMATION ACT ASSESSMENT

This policy is suitable for access by the General Public

Freedom of Information Officer Signature :

RATIFICATION BY Police Authority

Date: 17 July 2009

Equality Impact Assessed

Date:

The Ten General Principles of Public Life

Selflessness – members should serve only the public interest and should never improperly confer an advantage or disadvantage on any person.

Honesty and integrity – members should not place themselves in situations where their honesty and integrity may be questioned, should not behave improperly, and should on all occasions avoid the appearance of such behaviour.

Objectivity – members should make decisions on merit, including when making appointments, awarding contracts, or recommending individuals for rewards or benefits.

Accountability – members should be accountable to the public for their actions and the manner in which they carry out their responsibilities, and should co-operate fully and honestly with any scrutiny appropriate to their particular office.

Openness – members should be as open as possible about their actions and those of their authority, and should be prepared to give reasons for those actions.

Personal judgement – members may take account of the views of others, including their political groups, but should reach their own conclusions on the issues before them and act in accordance with those conclusions.

Respect for others – members should promote equality by not discriminating unlawfully against any person, and by treating people with respect, regardless of their race, age, religion, gender, sexual orientation or disability. They should respect the impartiality and integrity of the authority's statutory officers and its other employees.

Duty to uphold the law – members should uphold the law and, on all occasions, act in accordance with the trust that the public is entitled to place in them.

Stewardship – members should do whatever they are able to do to ensure that their authorities use their resources prudently, and in accordance with the law.

Leadership – members should promote and support these principles by leadership, and by example, and should act in a way that secures or preserves public confidence.