**Summary**

The MPS Vetting Policy defines the MPS’s vetting requirement, as set by Management Board, and the supporting processes that together ensure that all staff hold current and role appropriate vetting. All employees, contractors and those with access to police buildings, assets and information must be vetted to the appropriate level. This assists in protecting the MPS and its organisational assets from potential risks and harm.
Introduction

This policy supports the application of ACPO (Association of Chief Police Officers) / ACPOS (ACPO Scotland) National Vetting Policy for the Police Community (NVP), HMG (Her Majesty’s Government) Security Policy Framework (SPF) and National Police Improvement Agency (NPIA) circular 02/2011 in the MPS.

The policy and associated Standard Operating Procedures (SOPs) clearly define the vetting levels and associated processes to be applied within the MPS. Guidelines are set to ensure a consistent approach in line with ACPO NVP, NPIA Circular 02/2011 and the Security Policy Framework.

All previous Standard Operating Procedures and a number of notices are hereby cancelled. These are listed under “Associated Documents and Policies” below.

Application

This policy will apply with immediate effect.

All police officers and police staff, including the extended police family and those working voluntarily or under contract to the Mayor’s Office for Policing and Crime (MOPAC) or the Commissioner must be aware of, and are required to comply with, all relevant Metropolitan Police Service (MPS) policy and associated procedures.

This policy applies to any person who requires unescorted access to MPS premises or access to any MPS asset.

However, this policy applies in particular to officers and staff in the following roles:

- Management Board Members
- Vetting Board Members
- Head MPS Vetting Unit
- Vetting Section Managers
- Senior Vetting Officers
- Vetting Officers
- Vetting Sponsors
- Vetting Security Controllers
- MPS Contract Managers
- MPS Procurement Managers
- OCU Commander / Directors
• People Services - Recruitment Managers, Strategic Human Resources Advisors (SHRAs) and Human Resources (HR) Advisors
• Line Managers
• Individuals - MPS personnel, secondees, volunteers, cadets, contractors and other non police personnel

N.B. This list is not intended to be exhaustive.

The SOP for Vetting in the MPS details the responsibilities for each of these roles.

Purpose
The public is entitled to expect that the MPS recruits police officers and staff with proven integrity, who are not vulnerable to pressure from criminals or others to disclose information and who are unlikely to bring embarrassment or discredit upon the MPS. In addition, there is also an expectation that suitable checks are applied to all persons wishing to have access to MPS premises or assets who are not employed by the / Commissioner.

The purpose of this policy is to ensure that all employees and non police personnel who require access to MPS premises, information or other assets hold a current and appropriate level of vetting.

Further, the vetting process helps ensure that the MPS does not employ officers, or others to be used in the evidential chain, whose criminal record would be prejudicial to their ability to support the MPS’s mission to bring offenders to justice.

Vetting is one of several key control measures used to mitigate the security risks facing the MPS that ultimately Management Board are responsible for as part of a wider risk management approach to protecting the integrity, security and reputation of the MPS. Risk management principals are reflected in the MPS’s application of vetting, in line with national guidelines and best practice.

Scope
This policy applies to all persons who require access to MPS premises, information or other assets and there is a range of supporting activities underpinning the application of this policy:
• Recruitment, where vetting forms an aspect of the pre-employment process
• The vetting process for each type of vetting used by the MPS
• Vetting performance management in line with service level agreements
• Quality assurance processes to ensure reasonable, consistent and proportionate decision making in line with policy
• Management of renewals and aftercare programmes
- Maintenance of a list of designated roles requiring enhanced vetting (Management Vetting, Security Check, Developed Vetting or Children and Vulnerable Groups Supervision - previously Youth Supervision)

- Vetting records management, including a single vetting database

- Annual security reviews for all designated post holders

- A process to enable vetting decisions to be challenged.

This policy does not apply to escorted visitors to MPS premises.

Unless a case for exceptional circumstances has been approved by Management Board, following a full risk assessment, there are no exemptions to this policy. All exemptions will be recorded by the MPS Vetting Unit and will be periodically reviewed.

Currently, Management Board has agreed the following two group exemptions:

- On 17 April 2009, Management Board approved a vetting exemption for existing members of the CPS who are deployed in MPS premises.

- Management Board agreed an exemption from applying CTC vetting and therefore renewals to staff employed prior to 1995. This decision was reviewed in November 2010 and upheld.

Policy Statement

Police and National Security Vetting is a prerequisite to becoming either a member of MPS staff or non-police personnel (as defined within this document) and must be periodically renewed. More detailed levels of vetting may also be required dependant on the particular role.

The standard vetting requirement is for direct employees to hold Recruit Vetting plus a Counter Terrorist Check (CTC) national security clearance, whilst the standard vetting requirement for non police personnel is Non Police Personnel Vetting (NPPV) Level 2 plus a CTC clearance.

Non police personnel include:

- Contractors (goods and services)

- Contingent Workers

- Partners, Consultants, advisors or any other person whose actions may impact on the reputation of the MPS.

MOPAC staff will be considered as MPS employees for the purposes of vetting.

If there are any circumstances in which it is proposed not to undertake vetting activity prior discussion with the Head of Vetting is mandatory.

As vetting clearances have a finite duration, all persons holding clearance are required to comply with the requirement to renew, periodically, their
vetting and must inform the MPS Vetting Unit of any changes in circumstances.

The MPS reserves the right to review an individual’s clearance at an earlier stage if, for example, adverse information comes to light relating to the individual, or a third party linked to them, or if there is material change in an individual’s personal circumstance.

Individuals working in designated roles must hold the appropriate type or types of vetting and must complete an annual security review.

The MPS adheres to national policy guidelines set by ACPO, National Police Improvement Agency and the Cabinet Office for police and national security vetting. However, due to practical issues arising from the volume of vetting undertaken by the MPS (over 27,000 vetting applications per year), the scale of the MPS’s requirement for Enhanced Vetting and unique London specific factors, MPS Vetting policy deviates from ACPO NVP and NPIA Circular 02/2011 in a number of ways.

A comprehensive list of these deviations, together with the supporting rationale is set out in Tables 1 and 2.

Sensitive personal data is disclosed by the candidate for the purposes of vetting. This information is used to search a series of databases in accordance with national guidelines and MPS Vetting Policy. This allows relevant information to be collected from Police, Government departments and Credit Reference Agencies. Vetting is a with consent process and there are national guidelines that are followed in terms of what information is deemed appropriate to request and how this information will be used as part of the vetting process.

All vetting records carry a protective marking of at least RESTRICTED and must be stored, moved and disposed of in accordance with the national guidance on The Management of Police Information, a statutory code developed by the Home Secretary under the Police Act 1996, the Data Protection Act 1998 and the Cabinet Office’s Security Policy Framework.

**Benefits**

This policy will ensure common standards are applied to all persons subject to vetting and a better understanding of vetting is held by candidates and MPS clients. Application of this policy and supporting procedures will enable a consistent approach to decision-making and the maintenance of high professional standards by the MPS Vetting Unit.

**Responsibilities**

This policy is owned by Assistant Commissioner Specialist Crime & Operations. MPS Vetting Board, on behalf of Management Board, is responsible for the governance of this policy and its application across the MPS.
It is the responsibility of the MPS Vetting Unit to:

- manage the vetting operation and meet service agreements and quality assurance standards,
- ensure compliance with this policy and relevant SOPs and
- monitor and review this policy and relevant SOPs
- Ensure all vetting records carry protective marking of at least RESTRICTED under the METSEC code.

Associated Documents and Policies

This policy has three Standard Operating Procedures:

- Standard Operating Procedure 1: Vetting in the MPS
- Standard Operating Procedure 2: Safeguarding Children and Vulnerable Groups and the MPS
- Standard Operating Procedure 3: Vetting for MPS Cadets

This policy should be read in conjunction with the following public documents:

- ACPO / ACPOS National Vetting Policy for the Police Community
- National Policing Improvement Agency (NPIA) Circular 02/2011
- Cabinet Office Security Policy Framework
- HMG Personnel Security Controls

This policy refers to or is relevant to the following MPS Policies:

People Services Policies:
- Unsatisfactory Police Performance SOP
- Police Staff Discipline SOP
- Police Staff Discipline Managers Guidance SOP
- Eligibility Criteria for Employment in the MPS SOP.
- Police Staff Postings SOP

Directorate of Professional Standards’ Policies
- Professional Standards Policy

Directorate of Information Policies
- Information Code of Conduct

This policy must comply with the requirements of key legislation within:

- Police Act 1996
• Data Protection Act 1998  
• Equality Act 2010  
• Human Rights Act 1998

Other documents pertinent to this policy include:
• Crown Prosecution Service (CPS) Prosecution Team Disclosure Manual
• Management of Police Information (MOPI) Code of Practice

The following Standard Operating procedures are hereby cancelled:
• SOP 1. Case acceptance and processing SOP
• SOP 2. Basic Check (BC) SOP
• SOP 3. Initial Vetting Clearance (IVC) SOP
• SOP 4. Counter Terrorist Check (CTC) SOP
• SOP 5. Security Check (SC) SOP
• SOP 6. Management Vetting (MV) SOP
• SOP 7. Candidates with cautions and convictions SOP
• SOP 8. Aftercare - Change of circumstances and clearance restrictions
• SOP 9. Appeals procedure SOP
• SOP 10. Vetting levels within the MPS SOP
• SOP 11. Interviewing Candidates SOP
• SOP 12. Transfer of National Security clearance SOP
• SOP 13. Pre and post selection interview checks with the DPS SOP
• SOP 14. Vetting guide for security controllers SOP
• SOP 15. Corporate identity documentation SOP
• SOP 16. Vetting of secondments, attachments and high level candidate
• SOP 17. Risk Management within vetting SOP

The following notices are hereby cancelled:
  Item 2 of Notice 28/2004
  Item 5 of Notice 29/2004
  Item 2 of Notice 30/2004
  Item 7 of Notice 35/2004
  Item 3 of Notice 04/2007
  Item 4 of Notice 04/2007
  Item 1 of Notice 43/2009
Table 1: Deviations from ACPO Policy

<table>
<thead>
<tr>
<th>#</th>
<th>ACPO SOP</th>
<th>ACPO policy</th>
<th>Proposed deviation</th>
<th>Rationale</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Management Vetting</td>
<td>ACPO Policy introduced 2 levels of Management Vetting. (MV and Enhanced MV) for the first time.</td>
<td>To maintain the current MPS management vetting regime. This is equivalent to an Enhanced MV check without</td>
<td>The MPS Vetting Unit reports that the basic MV level of vetting described in ACPO policy does not sufficiently manage the risk to the MPS of information leakage. ACPO guidance in this area provides a suggested minimum. The additional checks the MPS considers necessary to add to the MV minimum standard to make it sufficient robust to control the risks to the MPS means that the MPS is practically vetting to the EMV level of all personnel requiring enhanced police vetting.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• <strong>MV Clearance</strong>: long term, uncontrolled access to SECRET police information</td>
<td>• Mandatory interviews with the candidate</td>
<td>The MPS suggests that there is little distinction between ACPO’s Recruitment Vetting and Management Vetting levels, making ACPO’s Management Vetting Level of little additional value.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• <strong>Enhanced MV (EMV)</strong>: long term, uncontrolled access to TOP SECRET police information.</td>
<td>• Medical assessments by the Force Medical Officer in all cases (see 1b)</td>
<td>The MPS requires a significant number of staff to hold enhanced vetting clearance, unlike many smaller forces and has the capacity to process this requirement and so does not need an intermediate clearance in order to demand.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>+</td>
<td></td>
<td>A review of the current MPS enhanced vetting requirement is being undertaken throughout 2011 to ensure proportionate vetting requirements are in place.</td>
</tr>
<tr>
<td>2</td>
<td>Management Vetting</td>
<td>The suggested, minimum, requirement for Enhanced Management Vetting states that</td>
<td>The MPS proposes a targeted OH referral process for all MV candidates.</td>
<td>This matches the approach taken in National Security Vetting, an important factor in light of the new requirement to complete police</td>
</tr>
<tr>
<td>#</td>
<td>ACPO SOP</td>
<td>ACPO policy</td>
<td>Proposed deviation</td>
<td>Rationale</td>
</tr>
<tr>
<td>-----</td>
<td>----------</td>
<td>-------------</td>
<td>--------------------</td>
<td>-----------</td>
</tr>
<tr>
<td>3</td>
<td>Management Vetting (SOP 4)</td>
<td>ACPO policy states MV should last for 5 years.</td>
<td>An MPS MV level of Clearance will be a prerequisite of both SC and DV clearance. SC, DV and MV levels of clearance will be valid for 7 years.</td>
<td>Providing one expiry date will provide a consistent approach to renewing enhanced vetting cases, streamlining administrative processes for renewals. The risk posed by reviewing on a 7 year cycle is deemed acceptable and is mitigated by robust annual review processes and using a single but robust enhanced police vetting regime.</td>
</tr>
<tr>
<td>4</td>
<td>National Security (SOP6)</td>
<td>ACPO Policy states that it is not intended that all Police Officers and Staff should be Counter Terrorist Check (CTC) cleared.</td>
<td>That the MPS maintains its current policy. CTC clearance is required for any individual who requires unescorted access to 'designated' MPS premises, or access to sensitive MPS information, which may be useful to a terrorist organisation, or close proximity to an individual who is assessed as a terrorist target. Currently CTC clearance is the minimum level of vetting required for all Police Staff and Police Officers.</td>
<td>Management Board decision in light of the particular national security risks faced by the MPS</td>
</tr>
<tr>
<td>5</td>
<td>Open source searches (SOP1, 3, 4)</td>
<td>ACPO Policy suggests as a minimum a number of checks or database searches should be conducted on Employment Vetting, MV, SC and Internet (Open Source) checks will be conducted on all MPS Management Vetting applications, and if necessary on Employment</td>
<td>The MPS is currently developing a policy on open source searching appropriate for each level of vetting.</td>
<td></td>
</tr>
<tr>
<td>#</td>
<td>ACPO SOP</td>
<td>ACPO policy</td>
<td>Proposed deviation</td>
<td>Rationale</td>
</tr>
<tr>
<td>----</td>
<td>----------</td>
<td>-------------</td>
<td>--------------------</td>
<td>-----------</td>
</tr>
<tr>
<td>DV</td>
<td>Internet (Open source) checks have been added to the list.</td>
<td>Vetting cases when intelligence or other information indicates a valid reason for checking.</td>
<td>There is a balance as to the resource the MPS can afford to invest in open source searching and the value such searches can yield from social networking sites, given that some information may be password protected for some candidates and not for others.</td>
<td></td>
</tr>
<tr>
<td>6</td>
<td>Appeals (SOP 9)</td>
<td>ACPO Policy suggest that Police Authority Member form part of the appeals panel for those existing members of staff or non police personnel who already hold a clearance who wish to challenge a vetting decision.</td>
<td>The MOPAC will not be directly involved in hearing appeals but will periodically scrutinise the process to ensure the process is robust, fair and consistently applied. Current practice will be maintained, alongside robust monitoring processes. All appeals relating to national security vetting decision will be considered by the MPS ACPO lead for Vetting. All Youth Supervision appeals will be considered by the Head of SCD26. All MV appeals will be considered by the Head of the MPS Vetting.</td>
<td>The Government is proposing a legislative change to significantly overhaul Governance arrangements in the policing and community safety arena - and consequently the scrutiny functions of Police Authorities. Changes in London will be fast tracked, pending imminent legislative changes, and the new MOPAC (Mayor’s Office for Policing and Crime) may be in place before the end of this financial year. This will change several aspects of existing legislation. For example, Police Staff will not be employed by the MPOC whilst they are employed under current legislation by the MOPAC. Further, such active involvement in management processes is unlikely to neither fall within the remit of the new MOPAC nor be considered best use of their resource.</td>
</tr>
<tr>
<td>7</td>
<td>Convictions and Cautions Criteria (SOP 8)</td>
<td>Fixed Penalty Notices should be treated as a caution. The Cautions and convictions criteria for recruitment vetting and NPPV levels 2 and 3 states that in general that all unlisted cautions must be considered. ACPO policy suggests that at least five years must have</td>
<td>A candidate who was issued a PND less then 5 years ago will not be automatically rejected. The MPS will consider candidates with a PND unless the PND was issued for a public order or dishonesty based offence at which point ACPO guidance applies.</td>
<td>No guidance is provided within the NPIA circular on what weight should be applied to PNDs. However, a PND would never be issued for any of the offences where the NPIA circular suggests a caution alone would warrant the applicant being rejected. This is in contrast to ACPO Guidance which applies the same weight to them as a caution.</td>
</tr>
<tr>
<td>#</td>
<td>ACPO SOP</td>
<td>ACPO policy</td>
<td>Proposed deviation</td>
<td>Rationale</td>
</tr>
<tr>
<td>----</td>
<td>--------------------------</td>
<td>----------------------------------------------------------------------------</td>
<td>--------------------------------------------------------------------------------------------------------</td>
<td>----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td></td>
<td></td>
<td>elapsed following a caution being issued for an offence before a candidate can be considered for clearance.</td>
<td>A case by case approach will be taken when considering applicants with a PND(s) so that the MPS can exercise reasonable discretion. Provided these are declared by the candidate, serious consideration will be given to the individual, even if the PND was issued less than five years ago, especially if the PND is the only relevant information to be considered. Should the PND be issued for a public order or dishonesty based offence, or there are several PNDs under consideration, then the decision maker should consider applying standard cautions and convictions criteria. In general the nature, number and age of the PND(s) will be considered.</td>
<td>Penalty Notices for Disorder (PND) can be issued for a whole range of offences, many of which are relatively minor. The MPS wishes to take a reasonable and proportionate approach to vetting for candidates, including individuals applying to become a police officer. For example, it does not seem reasonable or proportionate to refuse vetting clearance to an individual issued with a PND for dropping litter two years ago.</td>
</tr>
<tr>
<td>8</td>
<td>Transfers and rejoiners (SOP 11)</td>
<td>The Integrity Health Check ascertains if there is any adverse intelligence, information on wrong doing, or specific vulnerability regarding the candidate. The receiving force Professional Standards Department will then make a recommendation to the Force Vetting Unit based upon the above grading system. The result will be one of 3 grades.</td>
<td>MPS Department of Professional Standards will share the information received in support of the red / amber / green grading with the Head of MPS Vetting Unit so the vetting decision maker can take a decision based on all available information.</td>
<td>This creates a more auditable and accountable system and reflects that it is the responsibility of the MPS Vetting Unit to make vetting decisions. The MPS adheres to all other aspects the protocol on Professional Standards and Integrity Health Checks on rejoining, transferring or seconded Police Officers or Police Staff.</td>
</tr>
<tr>
<td>#</td>
<td>ACPO SOP</td>
<td>ACPO policy</td>
<td>Proposed deviation</td>
<td>Rationale</td>
</tr>
<tr>
<td>---</td>
<td>----------</td>
<td>-------------</td>
<td>-------------------</td>
<td>-----------</td>
</tr>
<tr>
<td></td>
<td>GREEN – No security objection.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>AMBER – Information held on the candidate does not warrant a RED reply, however before granting clearance the information must be assessed in conjunction with any other information.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>RED – The Professional Standards Department do not recommend this person for the role.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>9</td>
<td>Finance - IVA (SOP 18)</td>
<td>Applicants who are subject of a current Individual Voluntary Arrangement (IVA) / Trust Deed should not be considered.</td>
<td>For Non Police Personnel Roles only - excludes Police Officer and Police Staff roles: Consideration will be given to candidates who are subject to a current Individual Voluntary Agreement (IVA), especially if this is the sole information on which the vetting decision is based. The decision will be based upon the amount of debt, how long the applicant has been engaged in the IVA - and any associated vulnerabilities. The role for which the candidate has applied will also be taken into consideration.</td>
<td>This is considered a more reasonable and proportionate approach, allowing each case to be considered on its own merits. This is especially true when the ACPO standard for officers is being applied to administrative or building maintenance roles.</td>
</tr>
<tr>
<td>10</td>
<td>Convictions and Cautions Criteria (SOP 8)</td>
<td>Any offence committed as an adult or juvenile which resulted in a prison sentence (including custodial,</td>
<td>To support the MPS’s wider community mission and in support of its partnership policy of crime</td>
<td>There are a number of roles which attract candidates with valuable life experience that makes them particularly effective and</td>
</tr>
<tr>
<td>#</td>
<td>ACPO SOP</td>
<td>ACPO policy</td>
<td>Proposed deviation</td>
<td>Rationale</td>
</tr>
<tr>
<td>---</td>
<td>----------</td>
<td>-------------</td>
<td>-------------------</td>
<td>-----------</td>
</tr>
<tr>
<td></td>
<td></td>
<td>suspended or deferred sentences and sentences served at a young offenders’ intuition or community home) should result in rejection.</td>
<td>reduction and diversion, the MPS would like to take a risk based approach to recruiting individuals into certain roles where it may be possible to grant a limited clearance for an individual to perform a given role where they have served a custodial sentence or other aspect of the cautions and convictions criteria may result in a vetting refusal. Currently such dispensation is applied to drug referral workers and certain outreach volunteer roles where candidates have turned their lives around having been through either the youth or adult criminal justice systems.</td>
<td>credible in certain roles, such as drug referral workers. In addition, this provides scope to apply a reasonable and proportionate approach to vetting in roles where Taint is not relevant. It will not be possible for individuals in these roles to transfer to other roles unless the appropriate vetting checks have been passed. Individuals in these roles do not require access to police information or IT systems and require no (or highly limited and controlled) access to MPS buildings. A register of all such roles will be maintained by the MPS Vetting Unit and case files where this exemption applies will be clearly flagged. Vetting Section Managers (members of the Senior Management Team) will be involved in the decision making of all such cases and these clearances will be subject to regular security reviews and aftercare.</td>
</tr>
</tbody>
</table>
Table 2: Deviations from NPIA Circular 02/2011

<table>
<thead>
<tr>
<th>Policy area</th>
<th>NPIA Circular instructions</th>
<th>Proposed deviation</th>
<th>Rationale</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Vetting Refusals.</td>
<td>Family member and associate refusals are likely to be made at Director of Human Resources Level.</td>
<td>Vetting decisions relating to information on third parties is currently made by Senior Vetting Officers. Controversial cases involving third parties will be discussed with a member of the Vetting Unit SMT.</td>
<td>Due to the scale of the MPS vetting requirement this is not achievable. Involving several decision makers in the process and maintaining a robust quality assurance system will ensure consistent, proportionate decision making. This area will be covered by the MPS decision making guidance for vetting officers. This approach is in line with ACPO policy.</td>
</tr>
<tr>
<td>2 IVAs</td>
<td>Applicants who are the subject of a current Individual Voluntary Arrangement (IVA) should not be considered.</td>
<td>Consideration should be given to candidates whose IVA is nearing completion.</td>
<td>The MPS believes this is a more reasonable and proportionate approach.</td>
</tr>
</tbody>
</table>