

Police Service of Northern Ireland

ABSTRACT – This Policy defines the various levels of vetting within the Police Community and details the procedures involved for each

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PD 01/10

POLICY DIRECTIVE

SERVICE VETTING POLICY (SVP) FOR THE POLICE COMMUNITY

1. POLICY IDENTIFICATION

POLICY TITLE: Service Vetting Policy (SVP) for the Police Community

POLICY OWNERSHIP:
DEPARTMENT Criminal Justice

BRANCH CJ4

POLICY APPROVED BY:

CCF REF/OTHER

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2. POLICY STATEMENTS

- (1) The Police Service of Northern Ireland (PSNI) is committed to the maintenance of the highest levels of honesty and integrity and to the prevention of dishonest, unethical and unprofessional behaviour. The purpose of the Service Vetting Policy (SVP) is to support that commitment by creating an understanding of the principles of vetting in the police community thereby establishing uniformity in vetting procedures.
- (2) Vetting exists to protect the Service, its assets and data from persons and organisations, both internal and external, which may cause harm or detract from its central purpose, vision and values. It is the aim of the PSNI through the agency of the Service Vetting Unit to provide an appropriate level of assurance as to the trustworthiness, integrity and probable reliability of all staff and Non-Police Personnel (NPP); working within the police estate.

3. INTRODUCTION

- (1) Police officers are given extraordinary powers over citizens and both police officers and police staff can have access to highly sensitive information. The public quite rightly expect police officers and police staff to be of good character. A robust vetting process not only safeguards our intelligence, operational and financial assets, but also preserves the health, safety and welfare of our staff and those with whom we work in partnership thus increasing public confidence.
- (2) This Policy explains how the PSNI will vet all individuals including contractors, agency staff, police officers and police staff prior to entry to the Service and PSNI estate. The Policy will also explain how enhanced vetting will be carried out for police officers and police staff prior to being employed in designated roles within the Service.

(a) Drivers for Change

- (i) Vetting of the Police Community in the past has sat with either Human Resources (HR) or C3 Vetting Unit. With effect from 10 October 2007 the C3 Vetting Unit transferred all matters concerning National Security Vetting to the Centre for the Protection of the National Infrastructure (CPNI). This has meant that PSNI have had to re-consider all vetting processes and the establishment of a Centralised Service Vetting Unit (CSVU);
- (ii) As a result of HM Government's Vetting Transformation Programme the Northern Ireland Security Vetting Unit (NISVU) within the Policing (Operational Support) Division of the Northern Ireland Office (NIO) closed in June 2008. As a result of this the PSNI must now use the services of the Defence Vetting Agency (DVA) within the Ministry of Defence (MOD) for elements of National Security Vetting processes. This has also caused significant changes to internal processes and procedures.

(b) Policy Aims

This Policy defines the vetting terms used within the police community and will establish a vetting level for every position within the PSNI.

(c) Application

- (i) This Policy will provide structured and accountable processes for the vetting of all persons working within the police community including police and NPP;
- (ii) Police personnel includes the following:
 - (aa) Police officers;
 - (bb) Permanent police staff;

- (cc) Police Community Support Officers and other designated civilians.
- (iii) NPP includes the following:
 - (aa) Contractors;
 - (bb) Consultants;
 - (cc) Agency staff;
 - (dd) Volunteers;
 - (ee) Members of other agencies working in partnership within PSNI;
 - (ff) Any person who requires unescorted access to police premises or uncontrolled access to police information.

(d) Legal Basis

The main pieces of legislation and guidance relevant to vetting are:

- (i) Her Majesty's Government's (HMG) Security Policy Framework V 1.0 – December 2008;
- (ii) Police (Testing for Substance Misuse) Regulations (Northern Ireland) 2007'
- (iii) The Safeguarding Vulnerable Groups (Northern Ireland) Order 2007;
- (iv) Home Office Circular 54/2003 entitled 'National Recruitment Standards – Eligibility Criteria for Police Recruitment and Consistent Recruitment Practices';
- (v) Police Reform Act 2002;
- (vi) Police Service of Northern Ireland (Recruitment of Police Support Staff) Regulations 2002;
- (vii) Police (Recruitment)(Northern Ireland) Regulations 2001;
- (viii) Regulation of Investigatory Powers Act 2000;
- (ix) The Police (Northern Ireland) Act 2000;
- (x) Official Secrets Act 1989;
- (xi) Security Services Act 1989;
- (xii) Data Protection Act 1998;
- (xiii) Section 75 of the NI Act (1998);
- (xiv) The Human Rights Act 1998;
- (xv) Health and Safety at Work (Northern Ireland) Order 1978;
- (xvi) 'A Good Practice Guide to the Pre-Employment Screening of Government Staff and Contractors' (Cabinet Office).

4. IMPLICATIONS OF THE POLICY

(1) Financial Implications/Best Value/Continuous Improvement/Efficiency

Recommendations contained in Her Majesty's Inspector of Constabulary (HMIC) Report 'Raising the Standard' 2006 have been considered in drafting this Policy. Consideration has also been given to the 'Association of Chief Police Officers (ACPO) National Vetting Policy for the Police Community.'

(2) Human Resources

- (a) This Policy required the establishment of a CVU to perform all functions of vetting for the police community. This Unit is headed by a Service Vetting Officer (SVO), who will be responsible for co-ordinating all vetting policies and procedures and is accountable to Assistant Chief Constable (ACC), Criminal Justice Department.
- (b) The centralisation and consolidation of vetting structures under Criminal Justice Department will be supported by appropriately trained staff in sufficient numbers to ensure compliance with this Policy.
- (c) An administrative system and database will be required for the processing and monitoring of all applications, annual assessments and renewals. Additional training will be required for staff in appropriate procedures and IT systems.

(3) Partnerships

This Policy has been developed in consultation with and co-operation with the NIO (NIVSU) and National Security Vetting Unit.

(4) Internal Policy Links

- (a) Service Procedure No 5/2010 – Service Confidence Procedure (SCP);
- (b) Policy Directive 10/09 – Management of Sickness Absence;
- (c) Service Procedure No 34/09 – Career Breaks and Unpaid Leave for Police Officers;
- (d) Policy Directive 09/08 – Police Response to Domestic Incidents;
- (e) Policy Directive 06/08 – PSNI Data Protection Policy;
- (f) Service Procedure No 55/08 – Selection Competitions and Appointments;
- (g) Service Procedure No 42/08 – Procedure for Identification and Disclosure of Disciplinary Findings of Guilt, Adverse Judicial Findings and Criminal Convictions of Police Officers
- (h) The Code of Ethics 2008;
- (i) Policy Directive 11/07 – Integrity and Professional Standards;
- (j) Policy Directive 04/06 – Equal Opportunities Policy;
- (k) Policy Directive 06/05 – Police Service of Northern Ireland Child Protection Policy;
- (l) Policy Directive 04/05 – Instructions Relating to the Recording, Acceptance or Declining of Offers of Gifts, Gratuities and Hospitality;

- (m) Policy Directive 08/04 – Procurement within PSNI;
- (n) Policy Directive 06/04 – Records Management Policy;
- (o) Policy Directive 03/04 – Freedom of Information Policy;
- (p) Service Procedure 29/00 – Additional Vetting for CARE, Community Affairs and Domestic Violence Officers;

(5) Risks

Failure to introduce and apply a Coherent and Robust Vetting Policy will expose the organisation to allegations of failing to provide the community with a professional service by appropriately vetted officers, staff and others. Implementation of the Policy will assist in providing the public with the confidence and reassurance to which they are entitled. However, vetting provides only a 'snapshot' in time and therefore the processes will have to be reiterative with set renewal periods to remain credible.

(6) Bureaucracy

The increase in the re-vetting process and annual assessments will create some additional bureaucracy, but this will be kept to a minimum and will only be generated as absolutely necessary.

(7) Consultation

Consultation has been carried out with the following:

- (a) Chief Constable/Deputy Chief Constable;
- (b) NIO
- (c) Head of Legal Services;
- (d) Human Rights Legal Adviser;
- (e) Employment Law Legal Adviser;
- (f) Federation/Superintendents' Association/Trade Unions;
- (g) District Commanders;
- (h) Heads of Department;
- (i) Head of Finance;
- (j) Head of Training;
- (k) Occupational Health and Well-being (OHW);
- (l) Head of Media and Public Relations;
- (m) Head of Professional Standards Department (PSD);
- (n) Police Ombudsman for Northern Ireland (PONI);
- (o) Head of HR;

- (p) Equality and Diversity Unit;
- (q) Women's Police Association;
- (r) Gay Police Association;
- (s) Ethnic Minorities Police Association
- (t) Cabinet Office, London;
- (u) Centre for the Protection of the National Infrastructure.

5. HUMAN RIGHTS/UNITED NATIONS CONVENTION ON THE RIGHTS OF THE CHILD (UNCRC)/EQUALITY/CODE OF ETHICS/FREEDOM OF INFORMATION

(1) Human Rights

- (a) The PSNI is committed to full compliance with the Human Rights Act 1998 in every aspect of its work. Any interference with a protected right arising from the operation of this Policy will be in accordance with the law, in pursuance of a legitimate aim and shall be necessary in a democratic society. The PSNI will not discriminate against any person in the application of this Policy;
- (b) This Policy is deemed to be Human Rights compliant and consideration has been given to the United Nations Convention on the Rights of the Child (UNCRC); it has been screened for Section 75 considerations and complies with the PSNI Code of Ethics. The Policy is suitable for disclosure in accordance with the Freedom of Information Act 2000.

(2) Confidentiality

- (a) Article 3: 'Privacy and Confidentiality' PSNI Code of Ethics applies to all vetting procedures and information;
- (b) Vetting procedures include the completion of vetting questionnaires, which may contain sensitive personal information. It is therefore important that members of staff have the opportunity to disclose this information in confidence, in the knowledge they will receive a professional response. The objective of the procedures is to reduce risks to the public and Police Service and to individuals serving in designated vetted posts;
- (c) The SVO, as the designated data owner, will retain vetting questionnaires and all other papers obtained during the PSNI vetting process in individual personal vetting files. These files will be managed as CONFIDENTIAL documents in accordance with the Government Protective Marking Scheme (GPMS) and as detailed in PSNI Manual of Protective Security.

6. MONITORING AND REVIEW

- (1) This Policy is owned by the ACC Criminal Justice Department and is to be implemented and reviewed by the SVO. The SVO will review the Policy document on the 1st anniversary of its inception and annually thereafter.
- (2) Interim reviews may also be prompted by feedback, challenge or change in legislation.