



Police Service of Northern Ireland

PSNI Vetting Procedures

Equality Impact Assessment

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PREFACE

Further to the statutory duties contained within Section 75 of the Northern Ireland Act 1998, PSNI committed to carrying out an Equality Impact Assessment (EQIA) on each policy where screening indicated that there may be significant implications in relation to one or more of the nine Section 75 grounds.

As part of ongoing considerations of PSNI Vetting Procedures and further to an initial screening exercise carried out between February 2014 and September 2014, it was agreed that an EQIA of the procedures would be appropriate. This draft report has been made available as part of the Formal Consultation stage of this EQIA.

We would welcome any comments that you may have in terms of this EQIA, including our preliminary recommendations with regard to measures to mitigate adverse impact. Further copies of this EQIA report are available on PSNI's website at www.psni.police.uk (pathway: 'Updates' / 'Consultation Zone').

If you have any queries about this document, and its availability in alternative formats (including Braille, disk, large print and audio cassette, and in minority languages to meet the needs of those whose first language is not English) then please contact:

Service Vetting Unit
S4 Anti-Corruption & Vetting
Service Improvement Department
Brooklyn
65 Knock Road
Belfast
BT5 6LE

Telephone: 101 ext. 22332 or
Email: psnivetting@psni.pnn.police.uk

Consultation will close at 16.00hrs on 28th August 2015.

Following consultation the Final Decision Report will be made available.

1. PSNI and SECTION 75

Policing with the Community Strategy

The PSNI's overarching policing aim is to Keep People Safe through the Policing with the Community. PSNI Vetting Procedures are designed to support and embed this strategy to gain the confidence of the whole community in the Police Service of Northern Ireland.

Vetting exists to protect the Police Service, its assets and data from persons and organisations, both internal and external, which may cause harm or detract from our central purpose, vision and values. It is the aim of vetting to provide an appropriate level of assurance as to the trustworthiness, integrity and probable reliability of all staff and non-police personnel working within the Police estate.

Vetting determinations are made with full cognisance taken of the impact of our decision making; we treat individuals from whatever background with courtesy, fairness and respect.

Section 75

Section 75 (1) of the Northern Ireland Act 1998 requires that PSNI shall, "in carrying out its functions relating to Northern Ireland, have due regard to the need to promote equality of opportunity" between the following nine Section 75 grounds:

- Persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation;
- Men and women generally;
- Persons with a disability and persons without; and
- Persons with dependents and persons without.

In addition and without prejudice to these obligations, in carrying out its functions relating to Northern Ireland, PSNI is also committed to having due regard to the desirability of promoting 'good relations' between persons of different religious belief, political opinion or racial group.

PSNI's Revised Equality Scheme, the Equality, Diversity and Good Relations Strategy 2012-2017 (EDGRS) was approved by the Equality Commission for Northern Ireland on 26th September 2012. This scheme sets out arrangements as to how PSNI proposes to fulfil its obligatory duties determined through Section 75 legislation and its implementation.

The EDGRS also acknowledges the commitment to carrying out Equality Impact Assessments (EQIAs) and policy reviews on existing policies and to screen all new policies as required.

PSNI has conducted screening of all policies, written and unwritten, to assess which policies may potentially impact on equality of opportunity and/or good relations obligations.

In the spirit of Section 75, it was determined that the processes and procedures attaching to PSNI Vetting Procedures should be subject to a full Equality Impact Assessment (EQIA). This report presents the draft findings of that assessment which has been made available for public consultation.

2. BACKGROUND

Vetting Timeline

Historically vetting of the Northern Ireland police community rested with;

- (i) PSNI Human Resources (HR), for police officer recruits;
- (ii) Crime Operations Department, for all other PSNI staff and non-police personnel;
- (iii) The Northern Ireland Security Vetting Unit.

With effect from 10 October 2007, the Crime Operations Department transferred checks concerning National Security Vetting to the Centre for the Protection of the National Infrastructure (CPNI).

As a result of HM Government's Vetting Transformation Programme, the Northern Ireland Security Vetting Unit (NISVU)¹ closed in June 2008.

This meant that PSNI had to re-consider all vetting processes and the establishment of a Centralised Service Vetting Unit (CSVU). The PSNI Service Vetting Unit came into existence in September 2008.

The PSNI then developed its own bespoke vetting policy: The Service Vetting Policy Directive (PD 01/10) it was approved for publication on 16th December 2009. The policy established vetting principles and practices in line with UK-wide guidelines across the police community whilst tailoring for the unique circumstances of Northern Ireland.

Revised Vetting Policy

Prior to 1998 the UK police community relied primarily on Home Office guidelines and National Security Vetting. However, in response to a number of high profile incidents, bespoke vetting procedures were developed across the UK police community in recognition of the unique and specific threats faced by the police over and above those relating to national security. PSNI's vetting procedures are in line with those laid out by the College of Policing.²

UK police vetting procedures now operate along with, but apart from, National Security Vetting. Each regime uses separate information sources and applies different decision-making criteria. While police vetting procedures are exclusively the responsibility of the relevant police service, responsibility for National Security Vetting checks rest with CPNI.

PSNI sub contract at a unit cost element of Developed Vetting to the Ministry of Defence's Defence Business Services DBS–NSV for example comprehensive personal interviews for police officers/staff.

The College of Policing's Vetting Code of Practice are thorough and exhaustive however PSNI have found they provided limited potential for the application of professional judgement in exceptional circumstances.

¹ Part of the Policing (Operational Support) Division of the Northern Ireland Office (NIO)

² The Vetting Code of Practice (College of Policing, 2014).

The PSNI is continually seeking to improve our vetting service, to respond positively to new developments and make our processes more robust. For example: a legal challenge against PSNI by way of judicial review (*Wylie v PSNI*, 2012) together with earlier legal precedent (*British Oxygen v Minister of Technology* [1971] AC 610), helped establish the need to incorporate 'unfettered discretion' within the new vetting decision-making process³. Consequently the Service Vetting Policy Directive (PD 01/10) has been reviewed and updated to the current draft vetting policy directive.

This new draft policy directive sets out in considerable detail the various stages in the vetting process regarding police officers/staff and non-police personnel. This includes for example an appeal process which can be invoked should clearance not be granted and the individual requests a review of the decision.

Who does vetting apply to?

PSNI Vetting Procedures apply to all those within the police community and include the following:

- (i) Police officers (including potential new recruits);
- (ii) Police staff;
- (iii) Non-police personnel (i.e. contractors; consultants; agency staff; volunteers; members of other agencies working in partnership with PSNI; any person who requires unescorted access to police premises or uncontrolled access to police information).

Vetting Levels

PSNI operate 6 levels of vetting clearance.

- (i) Level 2 NPP + CTC - basic level required for all non-police personnel⁴;
- (ii) Level 2 Police Staff + CTC - basic level required for all permanent police staff (after entry);
- (iii) Level 3 Recruit Vetting + CTC - police officer / police staff recruitment;
- (iv) Level 4 Management Vetting (MV) - applies to police officers and police staff applying for designated posts;
- (v) Level 5 Security Check - applies to all police officers, police staff and NPP where there is a requirement for long-term, frequent access to SECRET and occasionally TOP SECRET assets and information;
- (vi) Level 6 Developed Vetting (DV) - applies to all police officers, police staff and NPP and is the highest level only needed for the most sensitive roles and tasks involving long term and uncontrolled access to TOP SECRET information.

A range of criteria operate at each level to inform decision-making.⁵ For example, at Level 3 Recruit Vetting a person would generally be regarded as unsuitable for appointment if s/he had been

³ The principle of unfettered discretion recognises that a public authority may be acting unreasonably where it refuses to hear applications or makes certain decisions without taking individual circumstances into account by reference to a certain policy. When an authority is given discretion, it cannot bind itself as to the way in which this discretion will be exercised either by internal policies or obligations to others. Even though an authority may establish internal guidelines, it should be prepared to make exceptions on the basis of every individual case.

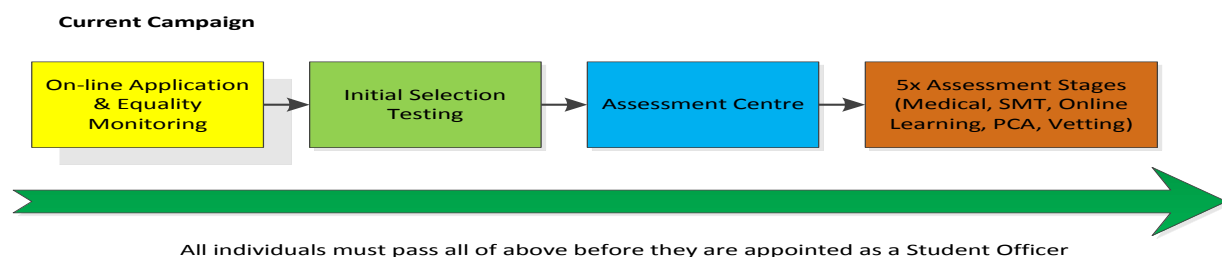
⁴ In GB, three levels of vetting apply to NPP whereas in NI only one level is applied, including national security vetting

⁵ See Appendices 2 and 3 for criteria applying to Non-Police Personnel and Police Recruits respectively.

convicted of an offence that carried a sentence of imprisonment or detention (including a suspended sentence). However when reaching a decision on suitability, the Vetting Panel can also take into account other factors including: the nature and gravity of the offence, the age of the applicant at the time of the offence, the nature and extent of the offending, and his/her subsequent behavior. Further to this were relatives or associates of the applicant are implicated in criminal activity, past or present, then this can also be taken into consideration by the Vetting Panel, including the likelihood that s/he may be adversely affected, e.g. through adverse pressure or conflict of interests.

Under the Police (Recruitment) (Northern Ireland) Regulations 2001 and Police Service of Northern Ireland (Recruitment of Police Support Staff) Regulations 2002, the Chief Constable appointed a Vetting Panel whose function is to decide, on his behalf and subject to his direction and control, the suitability of any candidate for appointment as a police trainee constable or permanent police staff member. During the vetting process, if information comes to light that gives cause for concern with regard to an individual's suitability then the matter is automatically referred to the Vetting Panel for a decision. If the Panel make a decision that the candidate is unsuitable then there is a further opportunity for review by an Independent Assessor. The final decision rests with ACC Service Improvement Department on behalf of the Chief Constable.

These procedures apply generally to all levels of vetting, although the constitution of the Panel may vary depending on the level of vetting. For example, the Non-Police Personnel Panel is normally made up of staff from within the Service Vetting Unit, while the Vetting Panel for recruits or staff normally includes a minimum of five people, and includes independent representation from the Northern Ireland Policing Board.



Details of the vetting procedure for applicants are provided online at:

<https://www.joinpsni.co.uk/application-process/policies#vetting>.

This site provides considerable detail of the vetting process for PSNI recruits, the criteria that will be applied (e.g. handling of previous criminal convictions) and information on relevant issues including drug testing and offensive tattoos. (An equivalent information source on vetting procedures for police staff and non-police personnel is not currently available). Serving officers and staff can access the Service Vetting Policy via the PSNI intranet, including full details of the criteria that will be applied at each level of vetting and the appeals process.

Types of Vetting

In reaching any decision on security clearance, there are two distinct types of vetting contained within 5 of the vetting levels: Police Vetting and National Security Vetting are considered.

Police Vetting includes:

- (i) Non Police Personnel Vetting (NPPV);
- (ii) Recruit Vetting (RV);
- (iii) Management Vetting (MV).

National Security Vetting includes:

- (i) Counter Terrorist Check (CTC);
- (ii) Security Check (SC);
- (iii) Developed Vetting (DV).

On each occasion the relevant level of Police Vetting must be completed and clearance granted, prior to National Security Vetting clearance being initiated. This reflects the fact that Police Vetting considers wider and more comprehensive threats other than National Security Vetting.

Given the extensive range of functions falling within the police estate, it is not surprising that on an annual basis, the total number of individuals, both police and non-police personnel that require to be vetted is considerable.

The table below shows the number of vetting procedures carried out at each level from January 2012 to December 2014, together with the number of those where clearance was not granted:

Level	Total Vetted	Not Cleared	% Not Cleared ⁶
Level 2 Non-Police Personnel	10,881	355	3.3%
Level 2 Police Staff (external)	72	0	
Level 2 Police Staff (internal)	1,232	1	0.1%
Level 3 Police Officer Recruit	2,136	65	3.0%
Level 4 Management Vetting	111	3	2.7%
Level 5 Security Clearance	626	2	0.3%
Level 6 Developed Vetting	833	3	0.4%
Total	15,891	429	2.7%

⁶ % have been rounded up to nearest decimal point

3. AIM OF THE POLICY

AIMS OF THE POLICY

The specific aim of PSNI's Service Vetting Procedures is set within the broader context of PSNI's purpose and guiding principles.

The overarching purpose of PSNI is to keep people safe. This goal is to be achieved through engagement with the community and our partners.

PSNI's guiding vision and purpose is:

- To build a more confident, safe and peaceful society;
- To keep people safe by preventing crime and harm to individuals and society;
- To keep people safe by protecting the vulnerable;
- To keep people safe by detecting those who commit crime and bring them to justice;
- To collaborate in our decision making and engage with the community and our partners;
- To be courteous, respectful and fair in everything we do and how we interact with the community as a whole;
- To be accountable, transparent in how and what we do.

Furthermore, across the UK, the Vetting Code of Practice sets out the purpose of vetting as the identification and assessment of risk relating to areas including, but not limited to:

- National security;
- Organisational reputation;
- Public safety;
- Public confidence;
- Protection of organisational assets;
- Impact on the reputation of the service;
- Operational safety;
- Leadership;
- Corruption / coercion;
- Integrity.

Operating according to best practice principles and in line with established UK-wide protocols, through appropriate security vetting procedures, to provide robust assurance as to the trustworthiness, integrity and reliability of all police officers, police staff and non-police personnel (NPP) working within the police estate.

Consultation Questions

Do you agree with the way in which the policy has been scoped and set out in this report?

Do you have any further comments about this section of the EQIA?

4. CONSIDERATION OF AVAILABLE DATA

For ease of interpretation, data will be considered in relation to the following three groups:

- (i) **Police Officers** - refers to warranted officers who can undertake a variety of duties, both in uniform and plain clothes, at any rank;
- (ii) **PSNI police staff** - refers to non-warranted staff directly recruited and employed by PSNI who provide a variety of functions – administrative, support and operational;
- (iii) **Non-Police Personnel** refers to employees or sole traders of private companies contracted to fulfill a support function on behalf of PSNI and within the estate. Such contracts are referred to collectively as Managed Services. Examples of functions covered include catering, cleaning, building maintenance, CCTV operation, site security, call handling, and groundwork. This group would also have included those on temporary contracts usually via an agency who remained their employer. The temporary workers contract concluded in December 2014 and has not been renewed.

Vetting will also be considered with reference to the six levels previously outlined.

Background Data

PSNI currently hold comprehensive background Section 75 monitoring data in relation to all PSNI employees (i.e. Police Officers and Staff) but not Non-Police Personnel (NPP). Monitoring of Non-Police Personnel would fall to the contracted company or individual, neither of which is likely to be designated under Section 75⁷. Appendix 4 provides a breakdown of current Section 75 data relating to PSNI's two primary employee categories.

PSNI Vetting Data

The following analysis is based on either the three most recent years where data is available (2012 – 2014) or data from recent competitions/campaigns for police recruits, mindful that the last completed competition was in 2010 (Competition 13 – September 2007, Competition 14 – September 2008 and Competition 16 – January 2010). Figures for the most recent competition ('Competition 1') are also referenced. These figures represent the most up-to-date information available while also spanning the time of the introduction of the new Service Vetting Policy in 2008.

Level 2 - Non-Police Personnel

	2012		2013		2014	
	No	%	No	%	No	%
Total Vetted	5154	100	3378	100	2349	100
Clearance Granted	5006	97.1	3257	96.4	2267	96.5
Clearance Not Granted	148	2.9	121	3.6	82	3.5

⁷ PSNI previously has sought guidance from the Equality Commission on this matter and was advised that PSNI can seek assurances from the supplier regarding adherence to relevant legislation but cannot require specific monitoring information from the supplier.

Between January 2012 and December 2014 a total of 10,881 non-police personnel were subject to vetting procedures. Of these, only 351 (3.23%) did not obtain clearance. No further monitoring data is available at this time by Section 75 grounds⁸.

Level 2 Police Staff - all permanent police staff (after entry)

During 2012-2014 a total of 1232 individuals were subject to vetting procedures. Of these, only one did not obtain clearance. Given the small number, no further breakdown can be provided.

Level 3 - Police Officer / Police Staff Recruitment⁹

Competitions 13 and 14 were chosen as they fell either side of the previous version of the Service Vetting Policy and the most recent completed Competition 16 2010/11 was also chosen. The 2013/14 campaign is still ongoing at present and has therefore not been included in the analysis.

	Competition 13 2007/08		Competition 14 2008/09		Competition 16 2010/11		Competition 1 (current)	
	No	%	No	%	No	%	No	%
Total to be Vetted	1027	100	1290	100	672	100	742	100
Failed other assessment	435		629		193		258	
Clearance Granted	559	54.4	627	48.6	449	66.8	466	62.8

	Competition 13 2007/08		Competition 14 2008/09		Competition 16 2010/11		Competition 1 (current)	
	No	%	No	%	No	%	No	%
Clearance Not Granted	33	3.2	34	3.0	30	4.5	18	
Did not request Appeal	20	1.9	18	1.4	5	0.7	2	
Appeal rejected	12	1.2	14	1.1	24	3.6	15	
Appeal accepted	1	0.01	2	0.02	1	0.02	1	

There are still 23 cases ongoing in relation to the current Competition 1. Across all four competitions, of the 2,216 individuals who were vetted, a total of 115 applicants were denied clearance (5.18%). Of those 115 rejected, 45 (39%) did not request an appeal.

65 (2.93%) applicants who were vetted appealed to the Independent Assessor and were subsequently rejected by the Chief Constable's representative as per the the Police (Recruitment)

⁸ See consideration of Mitigating Measures page 20.

⁹, The significant shortfall between the numbers granted and refused clearance and the total vetted is made up of those applicants who withdrew or failed in other areas of the recruitment processes, their applications were then removed from the vetting process prior to a final decision being made as to their suitability.

(Northern Ireland) Regulations 2001 and Police Service of Northern Ireland (Recruitment of Police Support Staff) Regulations 2002.

A breakdown by all Section 75 grounds is available for all those vetted, and this is shown below (for competition 13, 14 and 16 combined).

Gender	Male	Female	Total
Applicants	16518	8250	24768
Vetted	1115	617	1732
Clearance Granted	1029	606	1635
Clearance Denied	86	11	97
% Denied Clearance	7.71%	1.78%	5.60%

While numbers are small, the % of women who were denied clearance (1.78%) appears somewhat lower than for men (7.71%), although differential crime rates by gender may help explain this difference.¹⁰

Community Background ¹¹	Protestant	Catholic	Undetermined	Total
Applicants	13767	10154	847	24768
Vetted	866	849	17	1732
Clearance Granted	823	795	17	1635
Clearance Denied	43	54	0	97
% Denied Clearance	4.97%	6.36%	0%	5.60%

A slightly higher percentage of Roman Catholic (6.36%) than Protestant (4.97%) recruits were denied clearance, although numbers are once more small and the difference is marginal.

Political Opinion	Unionist	Nationalist	Other	None	Not Stated / Blank	Total
Applicants	3561	2474	1077	15363	2293	24768
Vetted	218	246	89	1046	133	1732
Clearance Granted	205	228	83	996	123	1635
Clearance Denied	13	18	6	50	10	97
% Denied Clearance	5.96%	7.32%	6.74%	4.78%	7.52%	5.60%

Those from a Nationalist background were somewhat more likely to be denied clearance (7.32%) than those declaring a Unionist allegiance (5.96%), although differences are once more not likely to be significant.

¹⁰ <http://www.dojni.gov.uk/index/statistics-research/stats-research-publications/prosecutions-and-convictions/nisra-bulletin-042012-ni-conviction-and-sentencing-statistics-2007-2008.pdf>

¹¹ Under fair Employment & Treatment Order (FETO) regulations PSNI is required to monitor the community background of its employees. As a consequence, religious belief is not recorded or monitored. For the purposes of any analysis of workforce composition PSNI use community background information. The census dataset closest to community background for comparison purposes is 'religion or religion brought up in'.

Ethnic origin	White	Ethnic minority	Blank	Total
Applicants	24145	374	249	24768
Vetted	1720	10	2	1732
Clearance Granted	1625	8	2	1635
Clearance Denied	95	2	0	97
% Denied Clearance	5.52%	20.00%	0%	5.60%

Those from a minority ethnic community (20%) appear more likely to denied clearance, although the numbers are very small (two individuals), and difficulties attaching to vetting information of foreign nationals may be significant.

Domestic Status	Single	Married / CP / Co-habit	Separated/ Divorced	Widowed	Total
Applicants	15992	7527	948	143	24768
Vetted	1172	495	53	4	1732
Clearance Granted	1114	460	50	4	1635
Clearance Denied	58	35	3	0	97
% Denied Clearance	4.95%	7.07%	5.66%	0%	5.60%

Those who are married or co-habiting (7.07%) appear somewhat more likely to be denied clearance than single people (4.95%).

Sexual Orientation	Heterosexual	Gay / Lesbian	Bisexual	Blank	Total
Applicants	23389	475	295	609	24768
Vetted	1671	36	18	7	1732
Clearance Granted	1577	33	18	7	1635
Clearance Denied	94	3	0	0	97
% Denied Clearance	5.63%	5.00%	0%	0%	5.60%

There appear to be no significant differences by sexual orientation.

Disability	Yes	No	Blank	Total
Applicants	741	23894	133	24768
Vetted	34	1696	2	1732
Clearance Granted	31	1602	2	1635
Clearance Denied	3	94	0	97
% Denied Clearance	8.82%	5.54%	0%	5.60%

Those with a disability appear somewhat more likely to be denied clearance, although numbers are too small to allow for further interpretation.

Dependency	Yes	No	Blank	Total
Applicants	6570	17634	564	24768
Vetted	369	1334	29	1732
Clearance Granted	336	1274	25	1635
Clearance Denied	33	60	4	97
% Denied Clearance	8.94%	4.50%	1.38%	5.60%

Those with dependents are somewhat more likely to be denied clearance.

Age	17-25	26-35	36-45	46-55	56+	Total
Applicants	11928	8972	3318	498	21	24768
Vetted	845	713	158	14	1	1732
Clearance Granted	813	666	143	12	0	1635
Clearance Denied	32	47	15	2	1	97
% Denied Clearance	3.79%	6.60%	9.49%	1.43%	100%	5.60%

Age differences do not reveal significant trends, although those aged 36-45 years include the highest percentage of those denied clearance (9.49%).

A further breakdown of each competition by gender and religious belief is provided below.

In **Competition 13 (2007/8)**, 33 males (100%) and 0 females (0%) were not granted clearance. Of the 33 who did not pass, 21 were Roman Catholic (63.64%) and 12 (36.36%) were Protestant. 20 of the 33 did not request a review of the vetting decision (all male; 12 RC, 8 P), while 13 (all male; 9 RC, 4 P) had their appeal reviewed by the Chief Constable's representative.

In **Competition 14 (2008/9)**, 27 males (79.41%) and 7 females (20.59%) were not granted clearance. Of the 34 who did not pass, 17 were Roman Catholic (50%) and 17 (50%) were Protestant. 18 of the 34 did not request a review of the vetting decision (13 male, 5 female; 8 RC, 10 P), while all of the remaining 16 (9 RC; 7 P) had their appeal reviewed by the Chief Constable's representative.

In **Competition 16 (2010/11)**, 26 males (86.67%) and 4 females (13.33%) were not granted clearance. Of the 30 who did not pass, 16 were Roman Catholic (53.33%) and 14 (46.67%) were Protestant. Five of the 30 did not request a review of the vetting decision (all male; 4 RC; 1 P), while all of the remaining 25 (21 male, 4 female; 12 RC, 13 P) had their appeal reviewed by the Chief Constable's representative.

On the basis of these data, other than the earliest Competition 13, 2007/8 (which was prior to the review and implementation of the new Service Vetting Procedures), there is no evidence that community background reflects adversely in the outcome of the vetting process, with the number of Roman Catholics and Protestants not securing security clearance being proportionate to the balance by community background and proportionate to the applicant pool.

While the number of women not securing clearance is low relative to men, this is broadly in line with the lower representation of women in the applicant pool for all competitions.

Level 4 Management Vetting - applies to police officers and police staff applying for designated posts.

Year	2012		2013		2014	
	No	%	No	%	No	%
Total Vetted	72	100	28	100	11	100
Clearance Granted	70	97.2	28	100	10	90.9
Clearance Not Granted	2	2.8			1	9.1
Did not request appeal	2	2.8				
Appeal rejected					1	1
Appeal accepted						

The number of those staff applying for management vetting who are denied clearance typically remains low, with only three individuals being denied clearance since 2012 (2.7%) Further analysis of these individuals would not provide statistically sound conclusions and could lead to a breach of Data Protection Act 1998 as it could inadvertently identify them

Level 5 Security Clearance - applies to all police officers, police staff and NPP where there is a requirement for long-term, frequent access to SECRET and occasionally TOP SECRET assets and information

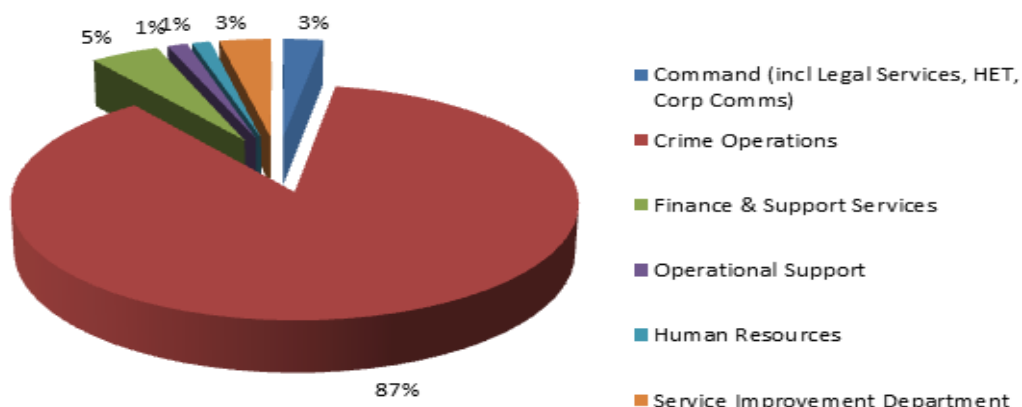
Year	2012		2013		2014	
	No	%	No	%	No	%
Total Vetted	173	100	231	100	222	100
Clearance Granted	173	100	230	99.6	221	99.5
Clearance Not Granted			1	0.4	1	0.5
Did not request appeal			1	0.4	1	0.5

Once more, the number of those denied clearance has been very low since 2012 (2; 0.3%)

Level 6 Developed Vetting - applies to all police officers, police staff and NPP highest level only needed for the most sensitive roles and tasks involving long term and uncontrolled access to TOP SECRET information.

While the numbers of those denied clearance at this level is extremely low (3), it may be interesting to consider the profile of those who present themselves for vetting. There is little evidence to suggest that vetting itself may discriminate on Section 75 grounds, but the profile of those presenting or not presenting for vetting may help identify any chill factors that may discourage applications.

Number of DV's currently in PSNI



As of December 2014, 1077 of PSNI officers/staff are Develop Vetted.

857 (79.57%) of those vetted are Police Officers, 220 (20.43%) are Police Staff

794 (73.72%) of those are male and 283 (26.28%) are female

872 (80.96%) of those are Protestant, 178 (16.53%) are Roman Catholic and 27 (2.51%) are Undetermined.

Across PSNI as a whole, 26.72% of officers and staff self-declared as Roman Catholic, 37.02% are female, while among officers, 29.22% are Roman Catholic and 28.15% are female. Given the preponderance of police officers among those vetted at this level (79.57%), and the historical profile and service of officers and staff within PSNI, the relative numbers of those going forward for developed vetting by gender and community background do not appear markedly disproportionate but it may be worthwhile exploring this issues further during the consultation period.

A number of internal recruitment campaigns have also been analyzed where there has been a requirement for applicants to be Developed Vetted for the role:

VB7/14 Protestant – 31 (55.36%), Roman Catholic – 23 (41.07%), Undetermined – 2 (3.57%)

VB8/14 Protestant – 6 (75%), Roman Catholic – 2 (25%),

VB9/14 As there were only 2 applicants to this process it is not possible to provide the community background breakdown, as this could reveal personal, sensitive information.

The applicant pool for the two competitions combined - 58% protestant; 39% catholic; 3% unknown. Based on above Roman Catholic applicants are over-represented in proportion to the overall officer composition (see table below for a breakdown of Police Officer by perceived community background, gender and ethnicity).

	% perceived Protestant	% perceived R Catholic	% Not Determined	% Female	% Male	% Ethnic Minority	Total No
Police Officers	67.19	30.74	2.07	27.34	72.66	0.54	6854

While this is a small sample it is PSNI's intention over the coming months to further analysis a number of internal selection processes where there is a requirement for applicants to be Developed Vetted and to look at any perceived chill factors overall and any pre-requisites for the posts that lead to such a small applicant pool overall.

Consultation Questions

Do you agree with the way in which the data has been analysed?

And set out in the report?

5. ASSESSMENT OF IMPACT

PSNI continues to invest a considerable human and material resource in its vetting procedures to ensure that they are fair, reasonable and transparent. The inclusion of unfettered discretion in the decision-making process allows for a considerable degree of latitude in recognising justifiable occasions where the candidate's previous history is unlikely to be relevant to their suitability.

Reflecting on these procedures, it is noteworthy that the number of applicants who are denied clearance remains very low. Between January 2012 and December 2014, a total of 15,891 individuals were vetted by PSNI, including both police personnel and others. Of these, only 429 (2.69%) had clearance denied, and there is little evidence to suggest that this small minority reflects significantly on any particular Section 75 ground of difference. Where there are differences in clearance rates between groups, they tend to be small and not significant. Further, the small number of individuals denied clearance restricts further analysis.

There is little or no evidence to suggest that any of the stated criteria directly discriminate on any Section 75 ground but this is not to deny that they may indirectly impact on people of a certain identity more than others because of demographic trends. For example, on average young males are more likely to commit criminal offences that may impact on a vetting decision. However, in all cases the criteria that have been set are considered to represent a proportionate means of achieving a legitimate aim, 'to provide robust assurance as to trustworthiness, integrity and reliability' (see p.9) and are therefore likely to be justifiable.

While the data provides no evidence that the vetting procedures unfairly discriminate on Section 75 grounds, it may be that chill factors could operate to make it less likely that certain individuals will put themselves forward for vetting in the first place. This reticence may be based on factual information or on hearsay and is an issue that may warrant further investigation during the formal consultation phase of the EQIA

Community Background

Available evidence suggests that current vetting procedures do not adversely impact on those of different community background, nor does it indicate that the criteria which are applied during vetting directly discriminate on this ground.

Political Opinion

Available evidence suggests that current vetting procedures do not adversely impact on those of different political opinion, or that the criteria which are applied during vetting directly discriminate on this ground.

Gender

Among police officer recruits there is some evidence to suggest that more male recruits are likely to be denied clearance (7.71%) than female recruits (1.78%), although sex differences in offending rates may help explain this difference. Among serving officers and staff there are few differences.

Race / Ethnic origin

In line with the College of Policing's Code of Practice, Counter Terrorism Checks (3 years), Security Checks (5 years) and Developed Vetting Checks (10 years) require scrutiny going back over significant periods of time. Where a person has been overseas prior to application, this may present

significant logistical difficulties and may therefore indirectly impact adversely on those from minority ethnic communities. While this issue is identified as significant, the criteria for each level of clearance have been established to ensure that the aims of the policy can be met fully and it would not be appropriate to alter these criteria. Hence no reasonable adjustments can be made to these criteria but efforts can be made to secure this information from relevant overseas bodies if necessary.

Age

Available evidence suggests that the current vetting procedures do not adversely impact on those of different ages, or that the criteria which are applied during vetting directly discriminate on this ground.

Sexual Orientation

Available evidence suggests that current vetting procedures do not adversely impact on those of different sexual orientation, or that the criteria which are applied during vetting directly discriminate on this ground.

Disability

There is little evidence to suggest that current vetting procedures adversely impact on those with a disability, or that the criteria which are applied during vetting directly discriminate on this ground. However, further opinion on this matter will be sought from representative bodies during the formal consultation stage of the EQIA.

Marital Status

There is no evidence to suggest that current vetting procedures adversely impact on those of different marital status, or that the criteria which are applied during vetting directly discriminate on this ground. At the same time, those who are married, cohabiting or in a civil partnership may be more likely to be adversely affected by scrutiny of family members during the vetting process. PSNI operate vetting criteria in line with guidance from the UK-wide Vetting Code of Practice and the risk posed by ignoring this criterion at particular levels of vetting would be considerable. Hence there is no opportunity to make a reasonable adjustment to accommodate this aspect of identity.

Dependency

There is no evidence to suggest that current vetting procedures adversely impact on those with or without dependents, or that the criteria which are applied during vetting directly discriminate on this ground. In line with Marital Status (above), those with dependents may be more likely to be adversely affected by scrutiny of family members during the vetting process. PSNI operate vetting criteria in line with guidance from the UK-wide Vetting Code of Practice and the risk posed by ignoring this criterion at particular levels of vetting would be considerable. Hence there is no opportunity to make a reasonable adjustment to accommodate this aspect of identity.

Consultation Questions

Do you agree with the way in which the adverse impacts have been established and set out in the report?

Do you have any further comments about this section of the EQIA?

6. CONSIDERATION OF MITIGATING MEASURES

PSNI has welcomed the opportunity that the EQIA has provided to subject its vetting procedures to close scrutiny, and in general terms remains content that the procedures are fair, reasonable and proportionate and in many respects represent best practice in the field.

At the same time, the EQIA has identified areas where the existing procedures can be further strengthened, or where more data can be gathered to help inform policy development. With these considerations in mind, it is recommended that:

- Future monitoring arrangements will be explored to ensure the capture of relevant Section 75 data especially in relation to Non-Police Personnel;
- The formal consultation stage of the EQIA will be used to help identify any chill factors attaching to the vetting process which may deter serving officers and staff from applying for MV, SC and MV;
- During the formal consultation stage of the EQIA, representative bodies will be encouraged to help identify any ways in which they think the vetting procedures may adversely impact on the people that they represent;
- Available information on vetting procedures will be reviewed to ensure that is fully accessible and transparent to all communities, thereby dispelling any myths or misconceptions;
- PSNI's website will be reviewed to ensure inclusion of detail of vetting procedures, for both police staff and non-police personnel;
- Procedures will be established to ensure that all vetting panels are broadly representative of community background and gender;
- All vetting panel members will be trained in equality of opportunity and Section 75 duties in particular and this training will be updated on a regular basis.

Consultation Question

Do you agree with the way in which the measures to mitigate and preliminary recommendations have been drawn up and set out in the report?

Do you have any further comments about this section of the EQIA?

7. CONSULTATION

PSNI is committed to consultation which is timely, open and inclusive, and conducted in accordance with the Equality Commission's Guiding Principles. The consultation process in respect of this EQIA will last for a period of **12 weeks** from **8th June 2015 to 28th August 2015**.

All Equality Scheme consultees will be notified of the availability of this EQIA report and invited to comment. A public notice will be prepared and issued to various media outlets to make the public aware of the EQIA and information about the EQIA will be placed PSNI's website; comments will be welcomed from any individual with an interest in the proposals.

All consultation documents can be made available in hard copy and alternative formats on request and can be accessed on PSNI's website at:

http://www.psnj.police.uk/index/updates/consultation_zone.html

As much background information as possible has been included within this report. If there is any information which has not been provided, PSNI will make every effort to do so on request. If any consultee has difficulty accessing the background information PSNI will consider providing summaries in other formats or explaining issues on a face to face basis.

All comments and queries regarding this report should be addressed to:

Service Vetting Unit
S4 Anti-Corruption & Vetting
Service Improvement Department
Brooklyn
65 Knock Road
Belfast
BT5 6LE

Telephone: 101 ext. 22332
Email: psnivetting@psni.pnn.police.uk

Consultation Questions

Do you agree with the way in which consultation is planned and set out in the report?

Do you have any further comments about this section of the EQIA?

8. FUTURE MONITORING FOR ADVERSE IMPACT

At the end of the consultation period, the EQIA report will be revised to take into account all comments received from consultees. PSNI's decisions will be incorporated into a final summary report which will set out the consideration given to the impact of alternative policies and mitigating actions. This will complete Step 7 of the EQIA process.

The final summary report will be made available on PSNI's website. In addition, Equality Scheme consultees and those who responded to the consultation will be notified of the availability of the report.

A system will be established to monitor the impact of any decisions in order to find out the effect on the relevant equality groups. Full details of the monitoring system will be included in the final summary report.

The results of ongoing monitoring will be reviewed on an annual basis and included in the annual review on progress to the Equality Commission. This review will be published on our website. This will complete Step 7 of the EQIA process.

If the monitoring and analysis of results over a two year period show that there has been a greater adverse impact than predicted, or if opportunities arise which would allow for greater equality of opportunity to be promoted, PSNI will take steps to achieve better outcomes for the relevant equality groups.

Consultation Questions

Do you agree with the way in which monitoring of the policy is planned and set out in the report?

Do you have any further comments about this section of the EQIA?

Do you have any further comments about the draft EQIA consultation report in general, including its findings and recommendations?

Appendix 1: Vetting Criteria for Non Police Personnel (NPP)

Determination on Level Two Police Vetting for Non-Police Personnel

Vetting exists to protect the integrity of PSNI, its assets and data from persons and organisations, both internal and external. It is the aim of the PSN, via the Anti-Corruption & Vetting Branch, to provide an appropriate level of assurance as to the trustworthiness, integrity and reliability of all non-police personnel (NPP) working within the police estate.

Anti-Corruption & Vetting Branch's function shall be to decide, on behalf of the Chief Constable and subject to his direction and control, the suitability of any non-police personnel who will be afforded unsupervised access to the PSNI estate and, in some cases, unsupervised access to its assets and infrastructure.

If during the vetting process there is information that gives concern with regard to an individual's suitability, the matter will be referred to the Anti-Corruption & Vetting Branch Vetting Panel for a decision. If the Panel is of the opinion that the individual is unsuitable, the individual will be informed of this by letter and told that they may seek in writing to have the decision reviewed by the Service Vetting Officer.

It is not possible to categorise and define succinctly every criminal conviction, intelligence and type of information that would make an individual unsuitable to work on or in the PSNI estate. The fact that a person has been convicted of an offence, has breached a court order, or has received a caution as defined by section 126 of the Police Act 1997(3) are all matters that may be taken into account by the Chief Constable in deciding their suitability.

Anti-Corruption & Vetting Branch has been given the discretion to vet non-police personnel. These guidelines are intended to ensure that they act reasonably by considering each application on a case by case basis and take all individual circumstances into account during the decision making process.

The following is intended to provide guidelines for the Panel and not to form an inflexible Policy Directive. The Panel must consider the merits of the particular application, taking into account the individual circumstances before arriving at a decision.

Though not exhaustive the following are considerations that the Panel should take into account where an applicant has a criminal conviction:

- 1) What is the nature and gravity of the conviction(s)?
- 2) The age of the individual at the time of the offence(s);
- 3) Did the individual disclose all their convictions / cautions?
- 4) The extent and nature of the offending;
- 5) The length of time since the last offence(s). Each offence(s) should be considered on its merits and earlier convictions or cautions should not necessarily be ignored;
- 6) Any organisational and reputational risk;

- 7) The exact role that the individual has applied for or is carrying out on behalf of PSNI and any associated risks with the particular role.

The Panel should also thoroughly examine the nature of each offence in terms of the level of:

- a) dishonesty;
- b) deceit;
- c) indecency;
- d) violence;
- e) hate crime;
- f) sectarianism;
- g) any other recordable offences which would cause concern regarding the confidence and protection of the public.

With respect to Cautions/ Disposals and Informed Warnings the Panel may treat minor offences committed as a juvenile as less serious than if committed by an adult provided the offences are minor and there is no indication of any disrespect for the law. The leniency should be the time lapse since the last conviction, namely 2 years since the last conviction. Except where otherwise stated, the number of convictions arising out of one incident is less important than the nature of each offence.

The Panel should also ensure that all information is accurate when reviewing the case. The applicant should be asked to provide an up to date position on his employment and any interaction with PSNI either directly or indirectly as part of their current role.

Determination on Level Two National Security Vetting for Non-Police Personnel

All national security vetting decisions will be made by the Service Vetting Officer. All available information will be taken into account to reach a reasoned decision on an individual's suitability to hold a national security clearance. On occasions the SVO will offer the appellant an interview to clarify any exceptional circumstances or issues that have not already been addressed during the vetting process.

Each decision will be judged on its own merits and a number of factors will influence this decision. These factors relate to an individual's involvement or connection with activities, organisations or individuals associated with the threats outlined in the statement of HMG Personnel Security and National Security Vetting Policy (or any similar new threats that emerge); personal circumstances; current or past conduct indicate that an individual may be susceptible to pressure or improper influence; instances of dishonesty or lack of integrity cast doubt upon an individual's reliability; other behaviours or circumstances indicating unreliability.

If the SVO is of the opinion that the individual is unsuitable, the individual will be informed of this by letter and told that they may seek in writing to have the decision reviewed by the Superintendent Anti-Corruption & Vetting Branch.

Applications should be referred to the Vetting Panel if the applicant has been convicted or cautioned for an offence such as:

Serious Offences;

Treason;

Murder;

Manslaughter/Culpable Homicide;

Rape;

Kidnapping/Abduction;

Incest/Intercourse with a girl under 13;

Buggery/Sodomy with a person under 16 or a person who has not consented;

Offences under the Sexual Offences Act 2003 punishable by life or more than ten years imprisonment (replaces the 1956 Act and includes rape, prostitution);

Hostage taking, hi-jacking or torture;

Involvement in espionage, terrorism, sabotage or any actions to overthrow/undermine parliamentary democracy by political, industrial or violent means or association (past or present) with any organisation advocating such activities;

Any driving offences involving "causing death by";

Firearms offences;

Any monitored hate crime (as per SP 16/12 Police Response to Hate Incidents);

Domestic Violence offences. Cases where there are allegations of domestic violence and where there is no formal police notice or court sanction must be closely examined and scrutinised and taken into consideration.

Any offence committed as an adult or juvenile which resulted in a prison sentence (including custodial, suspended or deferred sentence and sentences served at a young offenders institution or community home) should be referred to the Vetting Panel.

Other Criminal Convictions

Violence related offences, including, but not exclusively: -

Offences involving serious violence or injury including Grievous Bodily Harm (GBH) and Actual Bodily Harm (ABH)**;

Offences involving unsolicited violence towards others Unlawful possession of weapons, firearms or going equipped to steal, Offences under the Sexual Offences Act 2003, punishable by up to ten years imprisonment;

Any sexual offence involving a child (U18 within the meaning of the Sexual Offences Act 2003);

Gross indecency;

Acts of indecency;

Abuse or neglect of children;

Public order offences – involvement in riot, violent disorder, affray, causing fear or provocation of violence, causing intentional harassment, alarm or distress;

Criminal damage – *if 3 yrs. have elapsed since last conviction this may be considered;*

Drunk and disorderly – *if 3yrs have elapsed since last conviction this may be considered.*

Dishonesty related offences including but not exclusively: -

Interference with the Administration Of Justice or investigation of offences;
Offences which involve elements or acts of dishonesty, corruption, financial gain, loss, fraud and deception;
Burglary/Theft by housebreaking.

Drugs offences

Involvement in drugs including possession of Class A or Class B drugs and/or supplying drugs of any kind.

Serious Motoring offences

Dangerous driving within the last ten years;
One offence of drink driving or drunk in charge or drugs driving;
More than one offence of drink driving or drunk in charge or drugs driving;
Other serious motoring offences such as failing to stop after an accident or driving whilst disqualified;
Driving without insurance, *if 3yrs have elapsed since last conviction this may be considered.*

Minor Motoring Offences

More than three endorseable traffic convictions (including fixed penalties) within last two years (for offences on different dates);
Two or more convictions for regulatory offences such as failure to renew vehicle excise licence within the last five years.

Cautions

All 'unlisted' cautions may be considered and as a general rule at least 2 years must have elapsed following a caution not listed above.

Cases of criminal/anti-social behaviour where the case disposal has been by way of fixed penalty notice(s) should also be taken into consideration. Fixed penalty notices are to be treated as a caution.

Undisclosed Convictions

Where an individual has failed to disclose a conviction and or caution (dependent on the type or vintage, or offence) these applications may be referred to the Vetting Panel if required.

Outstanding Charges and Summons

Where there is an outstanding charge or summons or an individual is the subject of a police investigation this should be referred to the Vetting Panel.

Relatives and Associates

Where relatives or the associates of an individual are found to have spent or unspent convictions or cautions for recordable offences, or there is intelligence suggesting involvement in criminal activity, the following should be considered by the Panel.

The likelihood that the applicant will be adversely affected e.g. through adverse pressure or a conflict of interests;

The nature, number and seriousness of the offences or involvement in criminal activity and the time period over which these took place;

Whether the circumstances are likely to bring discredit to or embarrass the PSNI.

Three Year Checkable History

The PSNI need to determine the suitability of all non-police personnel who will have access to its estate and infrastructure. This guidance applies to all individuals (including United Kingdom nationals who have been living or working abroad). Therefore all non-police personnel are required to have a three year checkable history. All sponsors should ensure that non-police personnel who are required to be vetted for a role provide a copy of their criminal record from the appropriate police force, law enforcement agency as part of the vetting process.

For vetting to be meaningful it is suggested that individuals should have resided in the UK for at least three years. Whilst a copy of an individual's criminal record may satisfy some of the requirements in respect of police vetting, it does not address them all nor does it address all NSV issues.

The decision to grant clearance of non-UK nationals who do not meet the residency criteria will be made by the Service Vetting Officer (see Annex for further guidance).

Review Process for Non-Police Personnel – Police Vetting

Each appeal will be judged on its own merits and a number of factors will influence this decision. These factors include a person's age at the time of any offence(s) on their criminal record, the seriousness of these offences and how long ago they occurred. Whether or not someone has a clear record since, and whether they have declared this in full, are also relevant. If any exceptional circumstances have been put forward during the course of a review then these will be examined along with any letters of support from other interested parties, such as an employer. On occasions

the SVO will offer the appellant an interview to clarify any exceptional circumstances or issues that have not already been addressed during the vetting process.

The SVO will provide the appellant with a statement that will be as full as possible regarding the facts on which the decision is based. If reasons of security or confidentiality prohibit this, the appellant will be provided with as much information as possible.

If the SVO overturns the decision the appellant will be informed in writing. The appellant may, in exceptional circumstances, where they consider that the decision has been based on an error of fact or law or is irrational, make a written request for a review of this decision. This may be done by writing to Superintendent, AC&V, SID, explaining exactly the grounds upon which they wish to make this application.

Based on the above criteria there may be occasion when an individual's clearance is revoked. All decisions in respect of this will be made by the Vetting Panel. The Panel will provide the individual with a statement that will be as full as possible regarding the facts on which the decision is based. If for reasons of security or confidentiality prohibit this, the individual will be provided with as much information as possible. Where an individual considers that the decision to revoke their clearance has been based on an error of fact or law or is irrational, they may make a written request for a review of this decision. This may be done by writing to the Service Vetting Officer, AC&V, SID, explaining exactly the grounds upon which they wish to make this application.

Review Process for Non-Police Personnel – National Security Vetting

The Superintendent, AC&V will provide the appellant with a statement that will be as full as possible regarding the facts on which the decision is based. If reasons of security or confidentiality prohibit this, the appellant will be provided with as much information as possible.

If the Superintendent, AC&V upholds the original decision the appellant can make a further appeal in writing to;

The Secretariat
Service Vetting Appeal Panel
Room 335
70 Whitehall
London
SW1A 2AS

Appellants should ensure that they register their intent to appeal within 28 days from the date of this letter. The Secretariat will acknowledge your letter of appeal and request further background details about your case.

Residency Criteria / Checkable History

The purpose of the Residency Criteria / Checkable History is to ensure that meaningful vetting enquiries can be made in relation to the subject.

In order to be as equitable as possible and to avoid potential discrimination, it is vital that the Residency Criteria / Checkable History are applied equally to all individuals, regardless of nationality. An individual is considered to be resident in the UK if their permanent place of residence is in the UK. An individual, who has moved overseas and severed major ties to the UK, i.e. closed bank accounts, sold property etc., is considered, for the purposes of the Residency Criteria, to have surrendered their residency in the UK. This also applies if the individual has maintained bank accounts purely for the purpose of receiving regular payments, such as a UK pension.

An individual who has spent a significant period of time overseas without returning to the UK, but with the intention of doing so in the future, such as an individual who takes a gap year prior to or following University or an individual who goes travelling for a year, is considered to have taken an extended holiday. As such, they will maintain residency in the UK and therefore be eligible for consideration under the Residency Criteria.

An individual who has been posted overseas as part of their service with HMG / the armed forces is considered to have been resident in the UK for the period they have been posted overseas. Where an individual has been overseas as the spouse / partner of a member of the armed forces posted overseas, they can be considered to have been resident on the UK if their place of residence was within the confines of the establishment i.e. a military base. If they were residing outside of this, they are considered to have been resident overseas.

Whilst deviation from strict interpretation from the policy can be adopted in extreme cases, this should be the exception rather than the rule. In **EXCEPTIONAL** circumstances, the Service Vetting Officer may elect to depart from strict application of the residency criteria. Such departure requires the submission of a clear documented rationale including a full risk assessment conducted on an individual case by case basis.

Appendix 2: Vetting Criteria for Police Recruits

Police Service of Northern Ireland Vetting Policy is designed to support and embed the Policing with the Community Strategy 2020. The overriding principle of the strategy is to gain the confidence of the whole community in the Police Service of Northern Ireland. The fundamental context of this is that the Police Service of Northern Ireland delivers a Professional, Personal and Protective Service. The standards are set very high, not just in terms of service delivery, but in the manner in which that service is carried out and by the people who are performing that service.

Police constables play an important role in a democratic society, upholding the law and protecting the rights of all its citizens. To carry out this important function they have powers in such areas as arrest; the use of minimum force; carrying out searches; and seizing property. The public, quite properly, expect the highest standards from police constables when they are using these powers. It is, therefore, essential that applicants for police posts are vetted to guarantee they are suitable persons to carry out these and other duties and to ensure that the community at large has full confidence in their police service.

For the purposes of vetting all applicants are required to have a three year checkable history. All applicants who have spent time in the last three years outside the United Kingdom or Republic of Ireland should be aware that the process for checking will vary from country to country. Where it is not possible to carry out necessary checks an application will not be processed further. Applicants may be required to provide a copy of any criminal record held with another country.

If you receive a request for vetting information you will be required to complete the Police Service of Northern Ireland Part II: Police Service of Northern Ireland Recruitment Supplement and HM Government Security Questionnaire. You will be required to complete and return this questionnaire within two weeks of receiving it. **If you do not do this it will lead to your application being discontinued.**

c) Vetting Convictions Criteria

(i) Offences Generally

It is not possible to categorise and define succinctly every criminal conviction which would make an applicant unsuitable for employment in the Police Service of Northern Ireland, but applicants who have any of the following convictions will not be considered further:

- Any conviction where the sentence imposed resulted in a Custodial Sentence or a Suspended Sentence or a period of detention at a Young Offenders Centre;
- The fact that a person has been convicted of an offence, has breached a court order, or received a caution as defined by section 126 of the Police Act 1997 (3) may be taken into account, in accordance with any determination made by the Chief Constable in deciding his/her suitability for appointment

(ii) Motoring Offences

The following applicants will not be considered further:

- a. those who have been convicted of causing death by reckless (or dangerous) driving;
- b. anyone who has received more than one period of disqualification from driving;
- c. until 10 years has elapsed since conviction for any of the following: Dangerous Driving; 'Hit and Run Accident' offences, Drink Driving offences (including drugs), Driving Whilst Disqualified; Taking a Vehicle without Authority; Vehicle Interference and associated forging or fraudulently altering documents;
- d. permitting any of the offences at (c) above;
- e. until 5 years has elapsed since conviction for no insurance;
- f. until 5 years has elapsed since conviction for two or more convictions for regulatory offences;
- g. has been convicted on three or more occasions arising separately of any other offences under the Road Traffic Orders or any equivalent offences elsewhere within 5 years from the date of application.

(Fixed Penalty Notices may be taken into consideration when the attendant circumstances indicate a blatant disregard for the law).

(iii) Cautions

Where an applicant has received an official recorded caution whether as a juvenile or adult, the caution need not be a bar to selection, but will be the subject of further consideration. The final decision will be based on the nature of the offence and the period which has elapsed since the caution was administered.

Where an applicant has received three or more recorded cautions, the applicant will not be considered further until 3 years has elapsed since the date of the last administered caution.

(iv) Convictions or Formal Cautions in Other Jurisdictions.

The criteria used above will include corresponding or equivalent convictions or formal cautions imposed under any jurisdiction.

d) Vetting Policy on Tattoos

Having a tattoo does not prevent you from joining the Police Service of Northern Ireland, but certain tattoos and their visibility will not be acceptable. The determination of whether a tattoo is acceptable comes at the vetting stage after all tests, assessments and examinations.

It is not possible to provide definitive advice prior to this, but the guidance set out here is intended to assist people with tattoos in determining whether their tattoo(s) would be acceptable.

1. Tattoos which will lead to rejection:

A tattoo or tattoos, which would be visible when you are dressed in uniform (including short sleeve shirt order) and are considered to be:

- obscene; or
- sectarian; or
- offensive; or
- of disproportionate size in overall area; or
- likely to give rise to the impression that a member might not impartially discharge his/her duty.

2. Tattoos which may lead to rejection:

A tattoo or tattoos of the same classifications as at paragraph 1 above but which would not be visible when you are dressed in uniform (including short sleeve order) may lead to rejection. All such tattoos must be described giving size, location and nature. Dependent upon the nature of the tattoo, it may raise questions about the applicant's suitability to be a police constable. Judgment has to be made on the nature of the tattoo, the individual's background and the impression it may convey to others. The variables are immense and cannot be defined. All cases of doubt will be referred to the Vetting Panel for decision. It should be noted that the Police Service of Northern Ireland is committed to maintaining a neutral working environment and tattoos, which may not be visible to members of the public, may in certain circumstances be visible to other constable. In cases of doubt the applicant may be required to produce photographs of their tattoo or tattoos.

Appendix 3: PSNI Staff: Current Data

Religious belief (religion or religion brought up in)¹²

	Protestant		Catholic		Undetermined		Total
	No.	%	No.	%	No.	%	
Police Officers	5034	68.76	2139	29.22	148	2.02	7321
Police Staff	1883	76.73	473	19.27	98	3.99	2454
Total	6917	70.76	2612	26.72	246	2.52	9775
<i>NI TOTAL</i>	<i>875717</i>	<i>48.36</i>	<i>817385</i>	<i>45.14</i>	<i>117761</i>	<i>6.5</i>	<i>1810863</i>

Overall, PSNI continues to show an over-representation of non-Catholic staff across all grades of staff. Among PSNI non-uniformed staff, fewer than one in five (19%) were monitored as being either Roman Catholic or brought up in that denomination.

Political opinion¹³

	Unionist		Nationalist		Other		None		Prefer Not to Say / Blank		Total
	No.	%	No.	%	No.	%	No.	%	No.	%	
Police Officers	1089	14.88	245	3.35	263	3.59	2534	34.61	2190	43.57	7321
Police Staff	497	20.25	43	1.75	122	4.97	788	32.11	1004	40.91	2454
Total	1586	16.23	288	2.95	385	3.94	3322	33.98	4194	42.91	9775

Around three-quarters of respondents did not give an indication of their political opinion (77%). Of the minority who did, only 2.95% of employees described their political allegiance as Nationalist while 16.2% classified themselves as Unionist.

Ethnic group

	White		Ethnic Minority		Blank		Total
	No.	%	No.	%	No.	%	
Police Officers	7171	97.95	37	0.51	113	1.54	7321
Police Staff	2334	95.11	13	0.53	107	4.36	2454
Total	9505	97.24	50	0.51	220	2.25	9775
<i>NI TOTAL</i>	<i>1778449</i>	<i>98.21</i>	<i>32414</i>	<i>1.79</i>	<i>0</i>	<i>0</i>	<i>1810863</i>

The number of PSNI employees from a minority ethnic community remains small (0.5% overall) and includes only 50 people, with the majority (37; 74%) employed as full-time officers, PSNI employees from a minority ethnic community includes a diverse range of ethnicities, including Chinese (5), Indian (5), mixed race (22) and 'other' (18).

¹² Under fair Employment & Treatment Order (FETO) regulations PSNI is required to monitor the community background of its employees. As a consequence, religious belief is not recorded or monitored. For the purposes of any analysis of workforce composition PSNI use community background information. The census dataset closest to community background for comparison purposes is 'religion or religion brought up in'.

¹³ NI Population figures not available

Age

	18 - 25		26 - 35		36 - 45		46 - 55		56+		Total	Ave Age
	No.	%	No.	%	No.	%	No.	%	No.	%		
Police Officers	147	2.01	1893	25.86	2688	36.72	2332	31.85	261	3.57	7321	41
Police Staff	25	1.02	370	15.08	654	26.65	1022	41.65	383	15.61	2454	46
Total	172	1.76	2263	23.15	3342	34.19	3354	34.31	644	6.59	9775	
<i>NI TOTAL 16-74</i>	<i>252904</i>	<i>13.97</i>	<i>241858</i>	<i>13.6</i>	<i>257675</i>	<i>14.23</i>	<i>2E+05</i>	<i>13.42</i>	<i>317999</i>	<i>17.56</i>	<i>1313420</i>	

The age profile of PSNI employees is somewhat skewed towards those over the age of 35 (75.09%), with around 40% (40.9%) being over 45 years of age. PSNI staff (67.26%) in particular characterise this trend.

Marital and civil partnership status

	Single		Marr/CivP/ Co-Hab		Sep/Div/ DCivP		Widowed		Withheld/ Blank		Total
	No.	%	No.	%	No.	%	No.	%	No.	%	
Police Officers	1587	21.68	4992	68.19	712	9.73	25	0.34	5	0.07	7321
Police Staff	518	21.11	1638	66.75	265	10.80	25	1.02	8	0.33	2454
Total	2105	21.53	6630	67.83	977	9.99	50	0.51	13	0.13	9775
<i>NI TOTAL (16+)</i>	<i>517393</i>	<i>21.6</i>	<i>682074</i>	<i>64.97</i>	<i>1E+05</i>	<i>10.68</i>	<i>97088</i>	<i>1.05</i>	<i>0</i>	<i>0</i>	<i>1431540</i>

The marital status profile of PSNI employees closely parallels that for Northern Ireland as whole, with around two-thirds being married (67.83%) and 21.5% single.

Gender

	Male		Female		Total
	No.	%	No.	%	
Police Officers	5260	71.85	2061	28.15	7321
Police Staff	897	36.55	1557	63.45	2454
Total	6157	62.99	3618	37.01	9775
<i>NI TOTAL (in work)</i>	<i>647369</i>	<i>49.29</i>	<i>666051</i>	<i>50.71</i>	<i>1313420</i>

The gender profile of police officers continues to show an under-representation of women (28.15%). This trend is reversed among PSNI staff, where women comprise a significant majority (63.45%)

Disability

	Yes		No		Blank		Total
	No.	%	No.	%	No.	%	
Police Officers	414	5.65	5318	72.64	1589	21.70	7321
Police Staff	188	7.66	2162	88.10	104	4.24	2454
Total	602	6.16	7480	76.52	1693	17.32	9775
<i>NI TOTAL</i>	<i>569078</i>	<i>31.43</i>	<i>1E+06</i>	<i>68.57</i>	<i>0</i>	<i>0</i>	<i>1810863</i>

Given the nature of the work, it is perhaps unsurprising that among serving police officers the numbers declaring a disability are low (5.65%). What is perhaps more noteworthy is that among non-uniformed staff, the figure remains low (7.66%) in comparison with Northern Ireland as a whole (31.43%).

Dependents¹⁴

	Child		Person with a Disability		Elderly Person		None		Blank		Total
	No.	%	No.	%	No.	%	No.	%	No.	%	
Police Officers	3094	39.85	335	4.31	380	4.89	2008	25.86	1947	25.08	7764
Police Staff	940	36.04	145	5.56	237	9.09	882	33.82	404	15.49	2608
Total	4034	38.89	480	4.63	617	5.95	2890	27.86	2351	22.67	10372

A significant number of employees report that they have dependents (49.47%), with the overwhelming majority being children (39.89%). At the same time, a significant number (382; 14.7%) of non-uniformed staff do have either an elderly person or a person with a disability who is significantly dependent on them.

Sexual Orientation¹⁵

	Heterosexual		Gay/Lesbian		Bi-Sexual		Prefer Not Say		Blank		Total
	No.	%	No.	%	No.	%	No.	%	No.	%	
Police Officers	4952	67.64	81	1.11	13	0.18	416	5.68	1859	25.39	7321
Police Staff	1816	74.00	15	0.61	3	0.12	147	5.99	473	19.27	2454
Total	6768	69.24	96	0.98	16	0.16	563	5.76	2332	23.86	9775

94 full-time officers (1.29%) self-declared their orientation to be gay, lesbian or bisexual, with even smaller numbers among staff (0.73%). These figures are much lower than would be estimated among the population as a whole.

¹⁴ NI figures not available although it is estimated that 238,094 households have dependent children (33.86% of total) and 213,980 people provide unpaid care (11.82% of NI pop.)

¹⁵ NI figures not available although the Rainbow Project estimates that around 10% of the Northern Ireland population would not identify as heterosexual.