



College of  
Policing

[college.police.uk](http://college.police.uk)

# APP Vetting

October 2017

**BetterDecisions**<sup>™</sup>  
for **BetterPolicing**



© College of Policing Limited (2017)

This publication is licensed under the terms of the Non-Commercial College Licence v1.1 except where otherwise stated. To view this licence visit [http://www.college.police.uk/Legal/Documents/Non\\_Commercial\\_College\\_Licence.pdf](http://www.college.police.uk/Legal/Documents/Non_Commercial_College_Licence.pdf)

Where we have identified any third-party copyright information, you will need to obtain permission from the copyright holders concerned.

Any enquiries regarding this publication or to request copies in accessible formats please contact us at [contactus@college.pnn.police.uk](mailto:contactus@college.pnn.police.uk)

# Contents

<b>1 Introduction to vetting</b>	<b>05</b>
<b>2 Who does it apply to?</b>	<b>06</b>
<b>3 Why is vetting necessary?</b>	<b>07</b>
<b>4 Expectations of the Vetting Code of Practice</b>	<b>08</b>
4.1 Vetting and the Equality Act 2010	08
4.2 Expectations of police forces	09
4.3 Expectations of elected local policing bodies and chief officers	09
4.4 Expectations of police force vetting units	10
4.5 Expectations of force vetting managers	10
4.6 Expectations of applicants to the police service	11
4.7 Expectations of police personnel and volunteers	11
4.8 Expectations of non-police personnel, including contractors and partner agencies who work closely with the police service	12
<b>5 Vetting regimes</b>	<b>13</b>
5.1 Force vetting	13
5.2 National security vetting	14
5.3 Appeals procedure	14
5.4 Counter-terrorist check	14
5.5 Security check	15
5.6 Security check (enhanced)	16
5.7 Developed vetting	16
<b>6 Force vetting procedures</b>	<b>18</b>
6.1 Checkable history	18
6.2 Minimum force vetting residency periods	18
6.3 Residency criteria	19
6.4 Application of the residency criteria	19
6.5 Consideration for vetting officers when applying the residency qualification	20
6.6 Ability to transfer forces	21
6.7 Overseas jurisdictions	21
6.8 Minimum level of clearance	21
6.9 Designated posts	22
6.10 Authentication	23
6.11 Recruitment vetting	23
6.12 Recruitment vetting – and the national security vetting process	24
6.13 Recruitment vetting – checks and enquiries	24
6.14 Management vetting	26
6.15 Management vetting – checks and enquiries	26
6.16 Following a decision to grant clearance	28
6.17 Reviewing clearances	29
6.18 Non-police personnel vetting	29
6.19 Disclosure and barring service (DBS) checks	30
6.20 Individuals appointed by the police and crime commissioner	30
6.21 Non-police personnel who do not need to be vetted	31

6.22	NPPV level 1 – checks and enquiries	31
6.23	NPPV level 2 (abbreviated) – checks and enquiries	32
6.24	NPPV level 2 (full) – checks and enquiries	33
6.25	NPPV level 3 – checks and enquiries	34
6.26	National police systems contractors	35
6.27	Volunteer police cadets	35
6.28	Cadet leaders	36
6.29	Vetting of chief constables	36
6.30	Vetting of other chief officers	37
6.31	Attendance at the Police National Assessment Centre and Senior Command Course	37
6.32	Reciprocal vetting	37
6.33	Reciprocal vetting of chief constables	38
6.34	Reciprocal vetting of other chief officers	38
<b>7.</b>	<b>Decision-making and transparency</b>	<b>39</b>
7.1	Gathering information and intelligence	39
7.2	Assessing threat and risk	39
7.3	Convictions and cautions considerations	40
7.4	Risk-based assessment	41
7.5	Rehabilitation of offenders	42
7.6	CPS Disclosure Manual	43
7.7	HM forces	44
7.8	Relatives and associates	44
7.9	Financial checks	45
7.10	Financial information gathering	46
7.11	The financial scoring system	46
7.12	Financial checks for recruitment vetting	47
7.13	Financial check considerations for serving personnel	48
7.14	Financial checks for non-police personnel vetting	50
7.15	Financial checks for national security vetting	50
7.16	Vetting interviews	50
7.17	Preparation for the interview	50
7.18	Conducting the interview	51
7.19	Transferees and rejoiners	54
7.20	Transferees with management vetting clearance	54
7.21	Transfer during or after professional standards investigations	54
7.22	Return following dismissal or secondment	55
7.23	Further information regarding minimum checks	56
7.24	Other force intelligence	56
7.25	Reviewing checks and enquiries	59
7.26	Information relating to the subject	59
7.27	Factors requiring particular scrutiny	60
7.28	Circumstances which may impair judgement	60
7.29	Assessing the criteria for trustworthiness	61
7.30	Untested allegations	61
7.31	Information relating to third parties	62

7.32	Factors which support granting or refusing clearance	62
7.33	Biometric vetting	63
7.34	Consent	64
7.35	DNA and fingerprints	65
7.36	Destroying records	65
7.37	The clearance decision	66
7.38	Communicating the decision	66
7.39	Recording of applicants receiving vetting clearances where criminal behaviour has been identified	67
7.40	Refusing and withdrawing clearance	67
7.41	Employment Rights Act 1996 and Police (Performance) Regulations 2012	68
7.42	Suspension of clearance	69
7.43	Appeals	69
7.44	Flagstone records	70
7.45	Aftercare	71
7.46	Aftercare for non-police personnel vetting	71
7.47	Renewing clearance	72
7.48	Reviewing vetting clearance following misconduct	73
7.49	Transferring vetting clearance	73
7.50	Vetting health checks	73
7.51	Safeguards	73
7.52	Maintaining records	74
7.53	Re-joining the service	75
7.54	Career break	75
7.55	Transferees and extended absence	77
7.56	Internal moves	77
7.57	Business interests and secondary employment	77
<b>8. Appendices</b>		<b>79</b>
8.1	Background information	79
8.2	Force vetting forms	79
8.3	Financial checks	79
8.4	Biometric vetting	79
8.5	Flagstone records	79
8.6	Communicating the decision	79



# 1 Introduction to vetting

- 1.1 Everyone in the police service must maintain high ethical and professional standards and act with the utmost integrity. They must be seen to maintain and promote such standards. A thorough and effective vetting regime is a key component in assessing an individual's integrity. It helps to reassure the public that appropriate checks are conducted on individuals in positions of trust. Vetting also identifies areas of vulnerability which could damage public confidence in a force or the wider police service.
- 1.2 APP Vetting provides information on the vetting procedures which are to be applied by police forces in England and Wales. It has been developed to support the consistent application of the minimum national standards relating to vetting across the police service. See background information.
- 1.3 The purpose of APP Vetting is to:
  - set out the key principles of vetting in the police service
  - set out how those principles are to be implemented in the police service
  - support the consistent application of vetting standards across the police service
  - support the overarching **Code of Ethics**
  - support the **standards of professional behaviour**, and police staff code of conduct.
- 1.4 Vetting should not be used in isolation and should form part of a wider protective security regime. APP Vetting should be read in conjunction with the Vetting Code of Practice and the **National Decision Model**.

## 2 Who does it apply to?

### 2.1 APP Vetting applies:

- directly to the police forces maintained for the police areas of England and Wales defined in section 1 of the Police Act 1996 (it is available for adoption by other police forces or agencies)
- to applicants to the police service
- to individuals appointed to or employed by police forces, eg, police officers, police staff and members of the Special Constabulary
- to individuals and organisations working under contract to, in partnership with, or on a voluntary basis with police forces in England and Wales
- to local policing bodies
- to non-police force vetting units who conduct vetting
- to the College of Policing and its personnel.

# 3 Why is vetting necessary?

3.1 Vetting is conducted in the police service to help identify, assess and manage risk relating to areas including, but not limited to:

- national security
- public safety
- public confidence
- protection of organisational assets
- operational safety
- leadership
- corruption/coercion
- integrity.

3.2 Vetting clearances must be granted before an individual is appointed. This is because the vetting process can uncover information which shows that the individual is unsuitable to serve in the police service. To avoid undue delay in police business, vetting clearances need to be processed in a timely manner. Conditional clearance may be granted to an individual based on any known risks pending full clearance being received.

# 4 Expectations of the Vetting Code of Practice

This section includes guidance on what is expected of people who work for the police service (including contractors) and those seeking to join the service.

## 4.1 Vetting and the Equality Act 2010

- 4.1.1 The College of Policing **Leadership Review** identified future challenges to the police service including the need to ensure that those in policing have the skills and attributes to meet the changing nature of demand. Changes in society can be fairly rapid and it can be challenging for the police service to adapt unless it is more representative of the population.
- 4.1.2 Forces and force vetting managers (FVMs) should ensure that every opportunity is taken to support the police service in recruiting and retaining applicants where protected characteristics are evident.
- 4.1.3 The protected characteristics, as defined in the **Equality Act 2010**, are:
- age
  - disability
  - gender reassignment
  - marriage and civil partnership
  - pregnancy and maternity
  - race
  - religion or belief
  - sex
  - sexual orientation.
- 4.1.4 Forces and FVMs should:
- ensure that they are aware of and understand the significance of **unconscious bias** and that it does not have an impact on their vetting decision
  - ensure that they are able to provide statistical information from available force data which relates to their decision where a protected characteristic is evident

- support and promote positive action in respect of all under-represented groups within the police service.

## 4.2 Expectations of police forces

- 4.2.1 Vetting units must comply with the requirements of the Vetting Code of Practice and have a nominated force vetting manager (FVM). The FVM must have the authority of the chief officer to grant, refuse or withdraw vetting clearances relevant to their force or area. Each force must have suitable vetting arrangements that ensure compliance with the Code; these may be delivered collaboratively with other forces.
- 4.2.2 Following a dismissal (or resignation or retirement when a person is subject to a gross misconduct investigation), the College of Policing should be informed. Flagstone records must be created on intelligence systems (which are in line with the Vetting Code of Practice). This enables information to be available from a police national database (PND) search.

## 4.3 Expectations of elected local policing bodies and chief officers

- 4.3.1 In accordance with Home Office guidance, police and crime commissioners (PCCs) and their statutory deputies do not have to be vetted. Guidance from the national policing lead for vetting has stated that independent legally qualified chairs of misconduct hearings do not need to be vetted.
- 4.3.2 All other staff within the elected local policing body (ELPB) must be vetted in accordance with APP Vetting. ELPBs, through their monitoring officer or the chief executive and the FVM, must ensure that the chief officer of their force holds and maintains an appropriate level of vetting clearance.
- 4.3.3 In conjunction with the FVM, chief officers must ensure that police officers and staff are vetted to the required level before being appointed. They must also make sure that serving police personnel hold a valid vetting clearance.
- 4.3.4 For further information see Home Office (2012) Advice on security vetting and information sharing arrangements with PCCs. This document is available via the **Professional Standards Vetting community** on POLKA. This is a closed community and permission to join the community has to be granted.

## 4.4 Expectations of police force vetting units

### 4.4.1 Force vetting units (FVUs) must:

- abide by the principles set out in the Vetting Code of Practice
- coordinate and manage all clearances for their relevant area
- ensure that applicants and serving personnel are aware of the obligations placed on them by the Vetting Code of Practice and APP Vetting
- maintain records detailing all clearances conducted by the unit
- ensure that aftercare and renewal is conducted on clearances, where necessary, in accordance with the requirements of APP Vetting
- deal with all information provided and revealed during the vetting process with appropriate levels of sensitivity and security
- maintain appropriate levels of confidentiality at all times. Information should only be released to third parties where necessary and proportionate, such as during the course of a criminal or misconduct enquiry.

### 4.4.2 Personnel working in vetting should be cleared to a minimum level of management vetting (MV).

### 4.4.3 Vetting clearances should be dealt with in a consistent and efficient manner. When a vetting clearance is withdrawn or withheld and the applicant questions the decision, they must be provided with as much information as possible.

## 4.5 Expectations of force vetting managers

### 4.5.1 FVMs should ensure that decisions made should be consistent with APP Vetting. If they deviate from it, their rationale must be recorded and supported by the chief officer team.

### 4.5.2 FVMs should ensure that any decision rationale is fully recorded if applicants who have convictions, cautions or other disposals are accepted as police officers, special constables and police staff who are likely to be in the evidential chain, and there should be a process of notification to a chief officer. It is recommended that the information relating to these applicants is recorded on Centurion or another centralised professional standards department (PSD) recording system.

4.5.3 Where applicants are accepted by forces and do not meet the convictions, cautions, other disposals or residency criteria, their vetting clearance would not automatically transfer to other police forces.

## 4.6 Expectations of applicants to the police service

4.6.1 Individuals applying for the position of police officer, police staff or special constable must comply with the vetting process they are subjected to. In doing so, they must:

- provide complete and accurate information in response to all vetting enquiries
- notify the relevant vetting authority of any changes in their circumstances, relating to information provided as part of the vetting process, as soon as is possible.

4.6.2 Individuals who fail to comply with the process will have their vetting clearance withheld. Their application for employment or appointment will also be discontinued. Vetting clearances can also be withdrawn if it is shown that incomplete or inaccurate information was provided and, as a result, a misconduct investigation might ensue.

## 4.7 Expectations of police personnel and volunteers

4.7.1 Police personnel and volunteers must be vetted in accordance with APP Vetting and the Vetting Code of Practice. To ensure adherence to the **Code of Ethics**, all members of the policing profession must act with the highest levels of integrity. They should, therefore, disclose all relevant information during the vetting process. The individual's honesty and integrity will be questioned if information is purposely withheld. Potential vulnerabilities are likely to be identified as a result. Where they freely disclose such material during the vetting process, any potential vulnerability may be mitigated.

4.7.2 Changes in an individual's circumstances must be reported to the appropriate vetting authority as soon as possible after the change has occurred. This can include:

- changes in marital status or civil partnership
- change of name or address

- changes affecting an individual's financial status such as a county court judgement or participation in a debt management plan.

- 4.7.3 Failing to disclose the information could result in the vetting clearance being downgraded or withdrawn.
- 4.7.4 All vetting clearances must be subjected to the relevant aftercare process.
- 4.7.5 When information that might question the suitability of an individual's vetting clearance comes to the attention of police personnel, especially supervisors, the appropriate vetting authority must be informed. The information should be treated with the appropriate level of sensitivity and security in accordance with the **Data Protection Act 1998, government security classification (GSC)** and relevant force policies.

## 4.8 Expectations of non-police personnel, including contractors and partner agencies who work closely with the police service

- 4.8.1 Individuals who are not appointed or employed by the police service, but require unsupervised access to police assets (including information, systems or premises), must comply with the vetting process. Unsupervised access is not granted until vetting clearance has been obtained. Where vetting clearance is withheld or withdrawn, forces should not grant access.
- 4.8.2 Vetting clearances obtained by non-police personnel must be subjected to the relevant aftercare process. Costs incurred by a police force when processing vetting checks for contract staff may be charged to the contractor.

# 5 Vetting regimes

There are two vetting regimes in the police service:

- force vetting – designed to protect police assets
- national security vetting (NSV) – designed to protect government assets.

There is some commonality between the threats posed to police assets and government assets, but there are differences. The two regimes, therefore, have different decision-making criteria and the vetting enquiries involved draw on distinct information sources.

## 5.1 Force vetting

5.1.1 There are three levels of force vetting applicable to the police service:

- recruitment vetting (RV)
- management vetting (MV)
- non-police personnel vetting (NPPV).

5.1.2 Force vetting levels are applied to all individuals who require unsupervised access to police assets (including information, systems or premises). Some of these individuals also require access to **government security classified** (GSC) information and, where this is the case, the appropriate level of NSV is applied. Individuals who are not required to have unsupervised access to police information, systems or premises do not require force vetting clearance.

5.1.3 Force vetting considers wider and more comprehensive threats than NSV and is, therefore completed before initiating NSV enquiries. There is some commonality between force vetting and NSV enquiries.

5.1.4 All vetting levels in the police service are underpinned by the authentication procedure, which must be completed before any vetting enquiries are initiated. Completing this procedure satisfies the requirements of the national identity and access management service (IAM). There is no requirement to re-verify the individual's identity for IAM purposes, unless there has been a change of name.

## 5.2 National security vetting

5.2.1 There are currently four national security vetting (NSV) levels. These are:

- counter-terrorist check (CTC)
- security check (SC)
- security check (enhanced)
- developed vetting (DV).

5.2.2 The requirements of NSV levels are contained in the **Cabinet Office Security Policy Framework** (SPF).

5.2.3 Where a person requires SC, SC (enhanced) or DV clearance, they must also have MV. The relevant level of force vetting must be cleared before starting NSV clearance although operational timescales may mean NSV clearance is initiated before force clearance is granted finally.

## 5.3 Appeals procedure

5.3.1 Forces must have an appropriate appeals procedure for existing employees when NSV clearance is withheld or withdrawn. If the applicant is dissatisfied with the result of their appeal, they have the right to appeal to the **SVAP**. It is not mandatory to have an internal appeals procedure for external applicants applying for NSV clearance, although it would be considered good practice to do so in the interests of natural justice and procedural fairness.

## 5.4 Counter-terrorist check

5.4.1 Counter-terrorist check (CTC) clearance is required for individuals who are to be appointed to posts which:

- involve proximity to public figures who are assessed to be at particular risk from terrorist attack
- have access to information or material assessed to be of value to terrorists
- involve unescorted access to certain military, civil, industrial or commercial establishments assessed to be at risk from terrorist attack.

- 5.4.2 For the police service, this means all police personnel and non-police personnel whose work involves access as described above. The CTC process is contained in the enquiries for SC and DV. There is no requirement to conduct a separate CTC clearance for those who hold SC or DV.
- 5.4.3 It is not intended that all police personnel should be CTC cleared as a matter of course. It is, however, important that individual forces create an identified posts list by assessing all posts in the force and identifying those which fall within the criteria. It is only these that should be subjected to CTC clearance. Responsibility for the decision on whether a CTC is required for an individual, or identified role, rests with the chief officer.

## 5.5 Security check

- 5.5.1 Security check (SC) clearance is required for individuals who are to be appointed to posts which require:

- long-term, frequent and uncontrolled access to government assets marked SECRET
- occasional, supervised access to government assets marked TOP SECRET (such as chief constable's staff officer and some Special Branch staff).

- 5.5.2 SC clearance is also required for individuals who:

- while not in such posts, will be in a position to directly or indirectly bring about the same degree of damage
- will have sufficient knowledge to obtain a comprehensive picture of a SECRET plan, policy or project
- are being considered for appointment where it would not be possible to make reasonable career progress without security clearance for access to government assets marked SECRET
- need access to certain levels of classified material originating from another country or international organisation.

5.5.3 SC clearance should not normally be required for:

- occasional access to government assets marked SECRET in the normal course of business or during conferences, briefings or courses
- custody of a small quantity of government assets marked SECRET
- entry to an area where government assets marked SECRET are stored
- work in areas where government information at SECRET and TOP SECRET might be overheard
- use of equipment capable of handling government information marked SECRET, provided that access controls are in place.

5.5.4 In the above circumstances, the baseline personnel security standard (BPSS), or authentication supported by recruitment vetting (RV) or NPPV level 2 (full) or NPPV level 3 should normally be sufficient.

## 5.6 Security check (enhanced)

5.6.1 For access to certain sensitive material, SC (enhanced) clearance may be required. SC (enhanced) is an SC clearance supplemented by a review of personal finances.

5.6.2 The review of personal finances is comparable to MV. Therefore, all police personnel who hold SC clearance and have been vetted in accordance with the requirements of APP Vetting will be SC (enhanced) as MV clearance is a prerequisite to SC in the police service.

## 5.7 Developed vetting

5.7.1 Developed vetting (DV) clearance is required for individuals who are to be appointed to posts which require:

- frequent, uncontrolled access to government assets marked TOP SECRET
- access to TOP SECRET codeword material
- frequent, uncontrolled access to **category 1 nuclear material**
- access to certain levels of classified material originating from another country or international organisation.

5.7.2 It is also required for individuals who, while in such posts, will be in a position to directly or indirectly bring about the same degree of damage.

5.7.3 DV clearance should not normally be required for:

- occasional, supervised access to limited quantities of government assets marked TOP SECRET in the normal course of business or during conferences, briefings or courses
- custody of a small quantity of government assets marked TOP SECRET
- entry to an area where government assets marked TOP SECRET are stored
- work in areas where government information classified as TOP SECRET might be overheard
- use of equipment capable of handling government information marked TOP SECRET, provided that access controls are in place
- access to SECRET codeword material only
- police officers and police staff in posts where there is a threat from serious organised crime (provided that MV is applied and ongoing management of the clearance is augmented by a regular security review).

5.7.4 In the above circumstances, SC clearance should usually be sufficient.

# 6 Force vetting procedures

This section includes guidance on the different vetting procedures that have to be followed in order for an applicant to be granted the appropriate level of vetting clearance. In some cases, vetting clearance can be withheld or refused.

## 6.1 Checkable history

- 6.1.1 Checkable history only applies to force vetting. The process allows for meaningful enquiries to be made about an individual. Forces must apply checkable history equally to all vetting applicants, regardless of nationality. At present, it is not possible to make meaningful vetting enquiries in many jurisdictions outside the UK. The checkable history criterion has been developed to account for this area of risk.
- 6.1.2 Vetting clearance cannot be granted if the applicant has not been resident in the UK for the minimum period (see minimum force vetting residency periods) and comparable vetting enquiries cannot be made in jurisdictions where the individual has been residing.

## 6.2 Minimum force vetting residency periods

- 6.2.1 For the purposes of force vetting, the following residency requirements apply:
- recruitment vetting (RV) – three years
  - management vetting (MV) – five years
  - non-police personnel vetting (NPPV) – three years.
- 6.2.2 For national security vetting, the **Cabinet Office (2014) Security Policy Framework** (SPF) sets out the minimum periods of residence in the UK required before meaningful checks at the various levels can be completed. Departments and agencies should exercise discretion when individuals have not resided in the UK for the following periods:
- counter-terrorist check (CTC) – three years
  - security check (SC) – five years
  - developed vetting (DV) – ten years.

6.2.3 If the vetting applicant has been living outside the UK while serving with the armed forces or on government service, they are classed as being resident in the UK. An individual travelling overseas on a gap year or similar is considered to be on an extended holiday and has therefore maintained residency in the UK.

### 6.3 Residency criteria

6.3.1 The need for the residency rule arises from the requirement to vet all applicants in an equitable manner. This is because the UK police service does not currently have any means of facilitating vetting enquiries overseas to the extent required for those who are resident in the UK.

6.3.2 The purpose of the residency criteria is to ensure that applicants have a checkable history in the UK, so that meaningful vetting enquiries can be undertaken. The criteria provide reassurance when considering the health and safety of police personnel and the public. Effective vetting cannot be conducted if there is no way to assess the honesty, integrity, reliability and overall suitability for clearance of appointees against the information available.

6.3.3 The residency requirements refer to the period immediately before an application is made, and not any other three-, five-, or ten-year period, or any other accumulation of time spent in the UK.

### 6.4 Application of the residency criteria

6.4.1 If an individual resides permanently in the UK, they are considered to be a UK resident.

6.4.2 An individual who has moved overseas and severed major ties to the UK (eg, closed bank accounts and sold property) is considered to have surrendered their residency in the UK. This would also apply to people who maintain bank accounts purely for the purpose of receiving regular payments, eg, a UK pension.

6.4.3 An individual is considered to be on an extended holiday if they have:

- spent a significant period of time overseas without returning to the UK, but intend to return in the future
- taken a gap year before or following university
- travelled for a year
- spent time overseas visiting family.

6.4.4 This is not an exhaustive list.

6.4.5 Individuals who meet the above criteria maintain their UK residency and may therefore be considered for vetting clearance.

#### 6.4.6 Serving with the HMG or armed forces

6.4.7 An individual who has been posted overseas as part of their service with HMG or the armed forces is considered to have been resident in the UK for the period that they were abroad.

6.4.8 Where an individual has been overseas as the spouse, partner or dependent of a member of the armed forces posted overseas, they can be considered to have been resident in the UK if their place of residence was within the confines of the establishment, eg, a military base. If they were residing outside this, they are considered to have been resident overseas.

### 6.5 Consideration for vetting officers when applying the residency qualification

6.5.1 It is beneficial for the police service to reflect aspects of the communities it serves. Therefore, forces and force vetting managers (FVMs) can consider applying discretion to the residency requirement. The reasons for discretion should be made clear and recorded in the vetting file and must be approved by a chief officer before starting the vetting process.

6.5.2 Where the requirement is waived, regular reviews should be implemented until the subject meets the minimum residency requirement.

6.5.3 Where the residency criteria are enforced and vetting clearance is withheld, the subject should be provided with the rationale for this and encouraged to reapply when they meet the residency criteria.

## 6.6 Ability to transfer forces

- 6.6.1 Where residency criteria is waived, even if forces grant recruitment vetting and make the appointment, the individual's subsequent ability to transfer between forces may be limited. This is because the decision to appoint was made according to local need and based on the attitude to risk applied within the originating force. It is, however, also unlikely that the individual will attain any higher levels of vetting clearance under either the police or national security vetting (NSV) regimes until they satisfy the residency criteria.
- 6.6.2 Even where forces can obtain a checkable history for those who do not meet the minimum residency criteria, NSV enquiries may not be possible and FVMs should, therefore, give careful consideration to whether NSV clearance can be granted.

## 6.7 Overseas jurisdictions

- 6.7.1 If an applicant does not meet the minimum residency criteria, but the force is able to conduct vetting enquiries in the relevant overseas jurisdictions, they can remove the minimum residency period for force vetting levels. This can only occur when it is possible to make enquiries (equivalent to those made in the UK) with local law enforcement and national security bodies in the relevant jurisdictions. Checks are made on the applicant, their family members and associates.

## 6.8 Minimum level of clearance

- 6.8.1 The minimum level of vetting for all police personnel is RV. If a post is determined to require NSV clearance at SC or DV level, the post must also be subjected to MV clearance.
- 6.8.2 A post should be designated as requiring MV clearance if the post holder will have access to police premises, information, financial assets, intelligence or other operational assets where:
- the risk of potential compromise of those assets is high, and
  - the risk of serious damage to the force is substantial.

6.8.3 Serious damage is defined as:

- frustrating the prevention and detection of serious, organised or major crime
- frustrating the apprehension or prosecution of such offenders
- causing significant financial loss to the force
- unlawful or inappropriate awarding of contracts
- otherwise adversely affecting the operational capability, reputation or security of the force.

## 6.9 Designated posts

6.9.1 A review of all posts in force must be conducted to ensure that they have been assigned the appropriate vetting level. A designated posts list displays the outcome of the review and it is important that this is reviewed periodically to ensure that the information is kept up to date.

6.9.2 In determining the level of clearance that should be applied to a post, forces should consider the following factors:

- level of access to intelligence concerning covert or sensitive operations
- level of access to material classified SECRET or above
- access to source material and true source identities
- access to information relating to high-profile or sensitive matters such as royal visits, critical national infrastructure
- level of access to sensitive personal information
- level of influence over the management and/or awarding of contracts
- level of dealings with financial matters, such as access to budgets, authorisation of payments, receipt of income
- level of access to sensitive material concerning the police service
- nature and extent to which the role requires working with vulnerable people.

## 6.10 Authentication

- 6.10.1 Authentication is not a formal security clearance, but underpins all levels of force and national security vetting. It must be completed before the vetting process is started. Force vetting must be completed before starting NSV.
- 6.10.2 Authentication is used to confirm an individual's identity, nationality, employment eligibility and residency qualification. It does not allow access to police classified assets or unescorted access to any police premises.
- 6.10.3 It is the responsibility of human resources, the employer or other internal sponsor to ensure authentication takes place and is fully audited before vetting forms are forwarded to the force vetting unit (FVU). The authentication process comprises four stages and the information collected should be reviewed and assessed between each stage. The stages should be carried out in the order shown below:
- identity check
  - nationality check
  - employment eligibility
  - residency qualification.

## 6.11 Recruitment vetting

- 6.11.1 Recruitment vetting (RV) is the initial vetting process for police officers, police staff and members of the Special Constabulary. It is the minimum level of check acceptable for police personnel to be allowed access to police assets, estates and information. Where agency or fixed-term staff are being made permanent, they should be re-vetted to the appropriate level. Police officers retiring and rejoining as police staff should also be vetted if they have not received vetting clearance in the previous 12 months.
- 6.11.2 Where, however, individuals are changing from one internal employment group to another or are rejoining after retirement and have received vetting clearance in the previous 12 months, the requirement to re-vet can be substituted by a vetting health check. This applies if the level of vetting clearance for the new role is comparable to that already held. Where a higher level of vetting clearance is required, the individual should be re-vetted at the appropriate level.

6.11.3 RV clearance, preceded by authentication, allows regular access to police assets up to OFFICIAL-SENSITIVE and occasional access to SECRET. The RV process should be completed after the applicant has passed all other assessment criteria, such as assessment centres and interviews. In all cases, clearance must be processed and a decision reached as soon as reasonably practicable.

## 6.12 Recruitment vetting and the national security vetting process

6.12.1 For practical reasons it may be necessary for vetting applicants to complete NSV and force vetting questionnaires at the same time. Forces may consider starting the NSV process before granting RV clearance due to the time it could take for NSV clearance to be decided.

6.12.2 Those police officers, police staff and members of the Special Constabulary who require NSV must also be cleared to at least RV.

## 6.13 Recruitment vetting - checks and enquiries

6.13.1 Where the applicant has declared matters such as convictions, criminal investigations, financial issues or previous jobs in the police service, forces should make an initial vetting assessment on receipt of the application to ascertain whether the application should be progressed.

6.13.2 Vetting enquiries should be conducted in respect of all individuals named on the vetting questionnaires who are over the age of criminal responsibility, ie, 10 years old in England and Wales, 8 years old in Scotland and Northern Ireland.

Applicant	Minimum checks	Access to assets protective marking requirements
<ul style="list-style-type: none"> <li>• police officers</li> <li>• police staff</li> <li>• special constables.</li> </ul>	<p>On applicant, partner, all family (aged 10 years old and over), associates and co-residents:</p> <ul style="list-style-type: none"> <li>• PNC</li> <li>• intelligence database(s), including non-conviction databases</li> <li>• Special Branch</li> <li>• PND/other force checks.</li> </ul> <p>On applicant only:</p> <ul style="list-style-type: none"> <li>• record management system check</li> <li>• crime report allegations</li> <li>• voters records</li> <li>• check of vetting database</li> <li>• credit reference check and consideration of financial position</li> <li>• open-source enquiries (ie, search engines and social networking sites)</li> <li>• professional standards check where necessary</li> <li>• MOD checks where necessary</li> <li>• biometric vetting (where applicable)</li> <li>• where an applicant meets the residency qualification but identifies a period of residency outside the UK, consideration should be given to undertaking checks through the ACRO criminal records office for any potential foreign convictions.</li> </ul>	<p>RV, preceded by authentication, will allow access to police information classified up to OFFICIAL-SENSITIVE and occasional access to SECRET.</p>

See:

- other force intelligence/information checks
- sample recruitment vetting forms.

## 6.14 Management vetting

6.14.1 All police personnel with long-term, frequent and uncontrolled access to SECRET and occasional access to TOP SECRET assets should hold management vetting (MV) clearance (see designated posts and minimum level of clearance). In order to grant MV clearance, the force should ensure that they have no reason to doubt the integrity of the individual or their susceptibility to improper external influences.

6.14.2 MV clearance is a requirement for service in all posts requiring that level of clearance, irrespective of whether post holders have access to police or government classified assets. This can include individuals who award contracts or handle sensitive financial assets.

## 6.15 Management vetting – checks and enquiries

Applicant	Minimum checks	Access to assets protective marking requirements
Individuals identified as working in a designated post.	<p>On applicant, partner, all family (aged 10 years old and over), associates and co-residents:</p> <ul style="list-style-type: none"> <li>• PNC</li> <li>• local intelligence checks</li> <li>• PND/other force checks</li> <li>• all force databases (including non-conviction databases)</li> <li>• Special Branch</li> </ul> <p>On applicant only:</p> <ul style="list-style-type: none"> <li>• Ministry of Defence (MOD) (where relevant)</li> <li>• professional standards complaints and misconduct and intelligence databases</li> <li>• personal finances (includes financial questionnaire, force credit reference check and assessment of information returned)</li> <li>• business interest/secondary employment check</li> </ul>	MV allows access to police classified material or information up to SECRET and occasional access to TOP SECRET.

continued...

Applicant	Minimum checks	Access to assets protective marking requirements
	<ul style="list-style-type: none"> <li>• liaison with occupational health (where relevant)</li> <li>• open-source enquiries (ie, search engines and social networking sites)</li> <li>• enquiries relating to vulnerability to pressure or inducements (includes the indiscriminate use of alcohol or drugs and/or gambling)</li> <li>• appraisals from current and/or former supervisors to cover a minimum 12-month period</li> <li>• interviews with current and former supervisors at the discretion of the FVM</li> <li>• interviews with the person subjected to the vetting procedure at the discretion of the FVM</li> <li>• line manager endorsement</li> <li>• regular aftercare must be carried out for MV clearances</li> <li>• where an applicant meets the residency qualification but identifies a period of residency outside the UK, consideration should be given to undertaking checks through the ACRO criminal records office for any potential foreign convictions.</li> </ul>	

6.15.1 See:

- other force intelligence/information checks
- financial checks
- sample management vetting form
- sample annual security form.

## 6.16 Following a decision to grant clearance

### 6.16.1 Further information

- Appeals
- Aftercare

6.16.2 The force vetting manager (FVM) ensures that, in cases where clearance is granted, any reservations or limitations are clearly recorded. They also make the applicant aware that their senior line management will be notified of any limitations or restrictions.

6.16.3 When individuals are notified that their vetting clearance has been granted, forces must remind them of:

- their responsibilities for protecting both force and national security assets
- the requirements of the **Data Protection Act 1998** (DPA), **Official Secrets Act 1989**, **Computer Misuse Act 1990**, **government security classification** (GSC), force security policies and procedures
- the obligation placed on them to report any relevant changes in their personal and financial circumstances.

6.16.4 If forces refuse clearance, or there are limitations to the clearance, they must inform the individual and provide them with an explanation on request. There may, however, be circumstances when information is withheld by forces. This can include cases where:

- notification could prejudice a criminal or disciplinary inquiry
- disclosure would breach the DPA or other legislation
- information has been provided in confidence by third parties during vetting enquiries.

6.16.5 Forces should only disclose such information to the applicant if the person who provided the information agrees to its disclosure.

6.16.6 When considering the employment of volunteers, agency staff and/or work placements in posts designated as requiring MV, the advice of the FVM should be sought.

## 6.17 Reviewing clearances

6.17.1 A clearance can be reviewed at any stage during its lifespan if adverse information relating to the applicant comes to light, or there is a material change in an individual's personal circumstances. This can include:

- changes in marital status or civil partnership
- change of name or address
- changes affecting an individual's financial status, such as a county court judgement or participation in a debt management plan.

## 6.18 Non-police personnel vetting

6.18.1 Non-police personnel vetting (NPPV) assesses the honesty, integrity and reliability, and the overall suitability for clearance of anyone other than police officers, police staff and members of the special constabulary, who have unsupervised physical or remote access to any of the following:

- police premises
- information
- intelligence
- financial or operational assets
- corporate databases
- data networks or hard copy material.

6.18.2 Non-police personnel include, but are not limited to:

- agency personnel
- statutory crime and disorder partners
- HM Revenue and Customs
- UK Border Force
- third-party agents
- staff of elected local policing bodies (depending on role)
- a variety of contractors.

6.18.3 Non-police personnel may also include volunteers, consultants, auditors and researchers.

6.18.4 There are four NPPV levels:

- NPPV level 1
- NPPV level 2 (abbreviated)
- NPPV level 2 (full)
- NPPV level 3 (comparable to MV).

6.18.5 Consideration should be given to the level applied to each role, and to the information, intelligence and other assets to which the individual will have access. This ensures that non-police personnel are not subjected to a disproportionate level of vetting.

6.18.6 If non-police personnel decline or refuse to be vetted, their access to police assets will be restricted and they will only be given access to police premises as an escorted visitor.

## 6.19 Disclosure and barring service (DBS) checks

6.19.1 If the relevant role is under the direction and control of the chief officer, the RV check is sufficient as it incorporates checking the DBS Barred List (Child) on the PND. Further DBS checks are not required. If, however, the role is not under the direction and control of the chief officer, DBS checks are required. This includes all cases where NPPV clearance has been applied.

6.19.2 If police personnel (vetted to RV or MV) are operating for other bodies involved in regulated activity that are not under the direction and control of a chief officer, eg, undertaking voluntary work and working for a charity, their police clearance does not apply and appropriate DBS checks are required.

## 6.20 Individuals appointed by the police and crime commissioner

6.20.1 The NPPV procedures can also be applied to personnel who are appointed by the PCC, eg, custody visitors and members of ethics committees. If the subject fails the vetting process, the PCC decides whether or not an individual is suitable for an appointment after consultation with the chief constable or deputy chief constable

(DCC) senior information risk owner (SIRO). Only the chief constable or the DCC SIRO (with advice from the FVM) can authorise unsupervised access to police information, premises or assets if a subject fails the vetting process.

## 6.21 Non-police personnel who do not need to be vetted

6.21.1 Non-police personnel do not need to be vetted when they are admitted to police premises, if they are:

- Accompanied and
- remain under constant supervision and
- not permitted access to police information systems or classified material.

6.21.2 In these circumstances, existing procedures for the reception of visitors should apply.

## 6.22 NPPV level 1 – checks and enquiries

Applicant	Minimum checks	Access to assets protective marking requirements
<p>Examples include:</p> <ul style="list-style-type: none"> <li>• plumbers</li> <li>• electricians</li> <li>• vehicle recovery operators</li> <li>• removal personnel</li> <li>• volunteers (depending on role and risk).</li> </ul>	<p>On applicant only:</p> <ul style="list-style-type: none"> <li>• PNC</li> <li>• local intelligence and other non-conviction database(s) including Special Branch</li> <li>• PND/other force checks</li> <li>• where an applicant meets the residency qualification but identifies a period of residency outside the UK, consideration should be given to undertaking checks through the ACRO criminal records office for any potential foreign convictions.</li> </ul>	<p>NPPV level 1 no access to classified material.</p>

6.22.2 See:

- other force intelligence/information checks
- sample NPPV level 1 form.

## 6.23 NPPV level 2 (abbreviated) – checks and enquiries

Applicant	Minimum checks	Access to assets protective marking requirements
Non-police personnel with no systems access.	<p>On applicant, partner and co-residents (aged 10 years and over):</p> <ul style="list-style-type: none"> <li>• PNC</li> <li>• local intelligence checks</li> <li>• PND/other force checks</li> <li>• Special Branch.</li> </ul> <p>On applicant:</p> <ul style="list-style-type: none"> <li>• military checks</li> <li>• professional standards checks (as required)</li> <li>• CTC may be applied where appropriate</li> <li>• where an applicant meets the residency qualification but identifies a period of residency outside the UK, consideration should be given to undertaking checks through the ACRO criminal records office for any potential foreign convictions.</li> </ul>	<p>NPPV level 2 (abbreviated) allows access to police material up to OFFICIAL-SENSITIVE, either on police premises or by remote access.</p> <p>No systems access.</p>

### 6.23.1 See:

- other force intelligence/information checks
- sample NPPV level 2 (abbreviated) form.

### 6.24 NPPV level 2 (full) – checks and enquiries

Applicant	Minimum checks	Access to assets protective marking requirements
<p>Non-police personnel with unsupervised access to police systems and premises.</p>	<p>On applicant, partner, all family members and co-residents (aged 10 years and over):</p> <ul style="list-style-type: none"> <li>• PNC</li> <li>• local intelligence checks</li> <li>• PND/other force checks</li> <li>• Special Branch.</li> </ul> <p>On applicant only:</p> <ul style="list-style-type: none"> <li>• military checks</li> <li>• professional standards checks (as required)</li> <li>• credit reference check on applicant</li> <li>• CTC may be applied where appropriate</li> <li>• where an applicant meets the residency qualification but identifies a period of residency outside the UK, consideration should be given to undertaking checks through the ACRO criminal records office for any potential foreign convictions.</li> </ul>	<p>NPPV level 2 (full) allows access to classified police material/information up to OFFICIAL-SENSITIVE with occasional access to SECRET.</p>

6.24.1 See:

- other force intelligence/information checks
- sample NPPV level 2 (full) form.

## 6.25 NPPV level 3 – checks and enquiries

Applicant	Minimum checks	Access to assets protective marking requirements
<p>This applies more to non-police personnel having unsupervised, unrestricted access to police premises and systems and could include those working in areas where the police roles have been identified as designated posts.</p>	<p>On applicant, partner, all family members and co-residents (aged 10 years and over):</p> <ul style="list-style-type: none"> <li>• checks as required for level 2 (full) clearance to be conducted</li> <li>• military checks</li> <li>• professional standards checks (as required)</li> <li>• full financial checks on the applicant</li> <li>• regular aftercare must be carried out for NPPV level 3 clearances</li> <li>• where an applicant meets the residency qualification but identifies a period of residency outside the UK, consideration should be given to undertaking checks through the ACRO criminal records office for any potential foreign convictions.</li> </ul>	<p>NPPV level 3 allows access to classified police material or information up to SECRET and occasional access to TOP SECRET.</p>

6.25.1 See:

- other force intelligence/information checks
- sample NPPV level 3 form.

## 6.26 National police systems contractors

6.26.1 The National Police Chiefs Council (NPCC) lead for vetting has agreed that Warwickshire Police will:

- vet all national police system contractors to a level appropriate to the requirements of APP Vetting
- act as an authority in that respect on behalf of all police forces in England, Wales, Scotland and Northern Ireland.

6.26.2 National contractor vetting clearances are accepted by forces. This removes the requirement for forces to vet and re-vet individual contractors.

6.26.3 For NPCC guidance in relation to charging for NPPV, please see the **Professional Standards Vetting** community on POLKA. This is a closed community and permission to join the community has to be granted.

## 6.27 Volunteer police cadets

6.27.1 The **Volunteer Police Cadets** (VPC) scheme is a national police cadet programme working towards common aims and principles. A founding principle of the VPC scheme is to establish a membership of 25 per cent from a vulnerable background, including those at risk of offending or reoffending. The guidance in this section applies to forces that have adopted the VPC programme. Forces that have not adopted this scheme should apply the vetting levels identified in NPPV.

6.27.2 Cadets will not have unsupervised access to police premises or IT systems.

6.27.3 Vetting enquiries should be conducted on:

- PNC
- PND
- local non-conviction databases.

6.27.4 Enquiries will be conducted into the subject, their parents/guardians/carers, and any other individuals over 10 years of age who reside with the subject.

6.27.5 Vetting results fall into one of three categories:

- Those that reveal no reasons for concern about their joining the cadets
- Those needing further consideration in relation to individual circumstances before a final decision can be made
- Those that reveal matters so serious that they will prevent consideration of membership

## 6.28 Cadet leaders

6.28.1 At 18 years old, cadets have the opportunity to become cadet leaders. Cadet leaders are subjected to NPPV procedures and DBS clearance through the FVU.

6.28.2 Where risks are identified during the vetting process for ex-cadets who are applying to become cadet leaders, the VPC coordinator should be consulted. This is to ensure that their record as a cadet is taken into consideration.

## 6.29 Vetting of chief constables

6.29.1 Chief constables are vetted to DV level. The monitoring officer or the chief executive (from the elected local policing body) is the decision-maker for approving the clearance. The FVM provides support and guidance to the monitoring officer and manages and coordinates enquiries regarding a chief constable's vetting clearance.

6.29.2 The vetting clearance of chief constables may be transferable between forces upon the completion of a vetting health check, as detailed in APP Vetting. The vetting clearance is subjected to annual aftercare. This is managed and coordinated between the FVM and monitoring officer or the chief executive of the elected local policing body.

6.29.3 Appeals against a decision to withhold or withdraw vetting clearance for a chief constable are heard by the Home Office Departmental Security Unit (DSU).

6.29.4 A separate process is under development for chief constables who are appointed on direct entry from overseas forces.

## 6.30 Vetting of other chief officers

- 6.30.1 Deputy chief constables should be cleared to DV because they cover the duties of the chief constable in periods of absence.
- 6.30.2 Other chief officers, both warranted and non-warranted, are vetted to a minimum level of MV and SC. DV clearance may be applied where the post is identified as requiring this level of clearance. The chief constable is the vetting decision-maker for all other warranted and non-warranted chief officers within their force.
- 6.30.3 Responsibility for completing clearance for chief officers other than the chief constable is delegated to the FVM. The chief constable should be consulted over the clearance decision on an exceptional basis and particularly where adverse information has been revealed or consideration is being given to withholding clearance.

## 6.31 Attendance at the Police National Assessment Centre and Senior Command Course

- 6.31.1 The minimum level of vetting for delegates from UK police forces attending the Police National Assessment Centre (PNAC) and Senior Command Course (SCC) is MV and SC. It is the responsibility of individual forces to ensure that any delegates from the force are vetted to the required standard before their attendance.
- 6.31.2 The College of Policing does not accept any delegates from UK police forces on the PNAC or the SCC who are not vetted to the required standard.

## 6.32 Reciprocal vetting

- 6.32.1 The process for reciprocal vetting is as follows:
- Forces entering into reciprocal vetting must decide and agree between themselves the arrangements for conducting the necessary checks before commencing vetting activity.
  - Where reciprocal arrangements are used, the force conducting the enquiries should make a clearance recommendation, but the clearance decision remains with the FVM, or other appropriate line manager, of the requesting force.

6.32.2 This process has been developed for the following reasons:

- conducting in-house enquiries in relation to colleagues, particularly where matters relating to their personal life are revealed, may have an effect on working relationships within the force
- conducting in-house enquiries in relation to colleagues may render individuals vulnerable to allegations of corruption because of the associations and close working relationships that might develop within a small team
- where issues are raised by the vetting process, reciprocal vetting ensures that objective, impartial and transparent decisions are made.

6.32.3 Individuals in FVUs should be subjected to MV, with SC clearance applied where appropriate.

### 6.33 Reciprocal vetting of chief constables

6.33.1 This involves an FVM from another force managing and coordinating vetting enquiries.

6.33.2 Where reciprocal arrangements are used, the force conducting the enquiries should make a clearance recommendation. The clearance decision, however, remains with the monitoring officer or the chief executive of the local policing body for the force to which the clearance relates. The complete vetting file should, therefore, be returned to the requesting force in order for the clearance decision to be made. Where vetting clearance is declined, the chief constable has the right to appeal against the decision. The appeals process is undertaken by the Home Office DSU.

### 6.34 Reciprocal vetting of other chief officers

6.34.1 Where reciprocal arrangements are used, the clearance decision remains with the chief constable of the force to which the clearance relates. The complete vetting file should, therefore, be returned to the requesting force in order for the clearance decision to be made.

6.34.2 Where vetting clearance is declined, the chief officer has the right to appeal against the decision. The appeal is heard by the monitoring officer or the chief executive of the local policing body, with advice and support from the FVM.

6.34.3 As soon as a vetting health check has been completed, vetting clearances can be transferred between posts and forces. Clearances are subjected to the appropriate aftercare. This is coordinated and managed by the FVM.

# 7 Decision-making and transparency

Vetting decisions should be made in accordance with the **National Decision Model** (NDM). The underpinning principles are outlined in the Vetting Code of Practice. APP Vetting should form the basis of all vetting activity, including decision-making.

## 7.1 Gathering information and intelligence

- 7.1.1 The information and intelligence to be gathered is specific to each vetting level and to each individual case.
- 7.1.2 While vetting clearance should not be granted until all relevant vetting enquiries have been completed, forces can withhold clearance as soon as they have collated sufficient evidence to justify that decision. If an appeal is made against the decision, the force should complete any outstanding vetting enquiries before considering the appeal. This ensures that all relevant information is taken into account.
- 7.1.3 Where, however, it is evident from the outset that completing the outstanding enquiries will not add any value to the appeal, these do not need to be completed.

## 7.2 Assessing threat and risk

- 7.2.1 Risk is determined by the consideration of three primary factors:
  - threat
  - vulnerability
  - impact (see background document).
- 7.2.2 Acknowledged threats across the police service include:
  - police corruption (including noble cause corruption where the perpetrator of the corrupt act believes that their actions are justified by the outcome of the actions)
  - infiltration
  - financial vulnerability
  - criminal or other inappropriate association
  - substance misuse

- information leakage

- coercion.

7.2.3 Where potential threats are identified, there will be an associated vulnerability. The level of vulnerability is case-specific and depends on the circumstances of the vetting subject. In assessing risk and vulnerability, forces should consider all possible threats and, where potential threats are identified, assess these when determining the level of risk.

### 7.3 Convictions and cautions considerations

7.3.1 It is not appropriate to identify a prescriptive list of convictions and cautions that should lead to a vetting rejection. Each case should be considered on its own individual merits in relation to the role being undertaken and assets being accessed.

7.3.2 Applications for a position as a police officer; a special constable; or as a member of police staff where that member of staff may be in the evidential chain are to be rejected in all cases where:

- offences were 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); or

- the applicant is a registered sex offender or is subject to a registration requirement in respect of any other conviction.

7.3.3 **Note:** Where an individual was appointed by a force prior to the release of the APP this rejection does not apply to re-vetting decisions provided full details of the conviction or caution were provided at the time they applied for their initial role. However if seeking a higher vetting level the prior conviction/caution may be considered and could lead to the higher level vetting being declined if relevant.

7.3.4 For all other convictions or cautions there is a **rebuttable presumption** that they should be rejected. In particular, the following should result in rejection:

- offences where vulnerable people were targeted

- offences motivated by hate or discrimination

- offences of domestic abuse.

7.3.5 Note: Where an individual was appointed by a force prior to the release of the APP their re-vetting application should not be rejected on the basis of a previous conviction or caution provided full details of the conviction or caution were provided at the time they applied for their initial role. However if seeking a higher vetting level the prior conviction/caution may be considered and could lead to rejection if relevant.

7.3.6 Particular care should be taken where an individual has been convicted of (or cautioned for) offences of dishonesty, corrupt practice or violence. Although the rebuttable presumption is that these should lead to rejection, there will be cases where this may be disproportionate in the circumstances. For instance, where the offence was committed as a juvenile, it was not serious and the individual has demonstrated a commitment to help individuals or communities in the subsequent years, their vetting acceptance may be justified.

### 7.3.7 Ratification of vetting clearances

7.3.8 Where the decision is taken to grant vetting clearance to an individual who may be in the evidential chain with a conviction or caution, the decision must be ratified by a person of superintendent rank (or police staff equivalent), there should be a process to ensure a chief officer is notified and details must be recorded on the appropriate professional standards department (PSD) recording system.

## 7.4 Risk-based assessment

7.4.1 Convictions and cautions that are revealed by the applicant, should be subjected to a proportionate risk-based assessment that considers the circumstances of the:

- convictions
- cautions
- reprimands
- formal warnings
- final warnings
- fixed penalty notices
- restorative justice sanctions.

- 7.4.2 The assessment should consider both the circumstances of the offence and also the potential effect those circumstances may have on the applicant's role within the police service. The following are examples of what should be considered when making the assessment:
- seriousness of the offence
  - level of involvement of the individual in the criminal behaviour
  - motivation of the individual in committing the offence
  - openness of the individual
  - level of clearance required
  - length of time which has passed since any convictions have been obtained
  - impact on public confidence in the force/police service
  - relevance of the information to the post for which clearance is required, including unsupervised and unrestricted access to assets and premises
  - involvement in the evidential chain
  - the applicant's behaviour in the period since the conviction/caution.
- 7.4.3 The emphasis should be on making a balanced and proportionate decision, based on the information available and in accordance with the principles outlined in the Vetting Code of Practice.
- 7.4.4 Applicants who fail to declare a relevant matter, including any convictions, cautions and judicial or other formal disposals, whether spent or not, should be refused clearance at this stage on the grounds of integrity. They will be provided with the opportunity to appeal against the decision and can set out the reasons for their non-disclosure in their written submission.

## 7.5 Rehabilitation of offenders

- 7.5.1 The **Rehabilitation of Offenders Act 1974** (ROA) provides that certain convictions will become spent after a specified period of time. Thereafter, the applicant is considered rehabilitated. The rehabilitation period depends on the sentence imposed.

- 7.5.2 This means that, once the rehabilitation period has passed:
- the applicant must be treated ‘for all purposes in law’ as though they had never committed the offence
  - the applicant is not required to disclose spent convictions when answering questions relating to their conviction history
  - the applicant cannot be penalised for not disclosing a spent conviction
  - a spent conviction, or failing to disclose one, cannot be used to dismiss or exclude a person from any office or employment.
- 7.5.3 By virtue of the **Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975**, the ROA does not apply to individuals applying to become police officers. Therefore they can be asked about all convictions and cautions, whether spent or unspent, and all can be considered in the vetting process.
- 7.5.4 The situation regarding police staff and non-police personnel is more complicated. In general terms the ROA does not apply to “Persons employed for the purposes of, or to assist the constables of, a police force established under any enactment” and individuals can be asked about spent convictions and they can be considered in the vetting process. However this does not apply to protected cautions or convictions, and people applying to become police staff and those “assisting” a constable should not be asked about protected cautions or convictions and they should not be considered in the vetting process.

## 7.6 CPS Disclosure Manual

- 7.6.1 Guidance to forces on the impact of disclosure of convictions and cautions is provided in **Chapter 18** of the CPS Disclosure Manual. The document ensures compliance with the **Criminal Procedure and Investigations Act 1996** (CPIA) and provides guidance on all information that will be revealed to the prosecutor. This process is commonly referred to as taint.
- 7.6.2 The impact of appointing an individual who would be required to disclose convictions and cautions in accordance with **Chapter 18** of the CPS Disclosure Manual and CPIA cannot be underestimated. It can heavily affect the deployment of such an individual on appointment, and in some cases throughout their career. Generally, the impact will lessen as the time since the ‘finding’ recedes. Thus, when allowing an individual subject of the disclosure requirements to be appointed, they must be aware of the impact that such a requirement will have on their career.

7.6.3 Particular care must, therefore, be taken when clearing a candidate who will have to disclose:

- criminal convictions, criminal cautions and penalty notices for disorder
- criminal proceedings which have not been completed
- adverse judicial findings
- police disciplinary findings of guilt at a misconduct hearing
- relevant formal written warnings and disciplinary cautions
- disciplinary proceedings which have not been completed.

7.6.4 Further information on spent convictions, cautions, reprimands and final warnings can be found on the **NACRO website** (please note that this is for guidance only and is not a definitive assessment of the ROA).

## 7.7 HM forces

7.7.1 Serving members of the armed forces who are convicted of any criminal offence by a military tribunal normally have any such offence recorded on the police national computer (PNC). This includes any aspect of a conditional discharge. Further information may be found on police national database (PND), but where this has not been updated, forces must conduct a military check on all applicants who have previously served in the armed forces.

## 7.8 Relatives and associates

7.8.1 Where an applicant's relatives or associates have spent or unspent convictions or cautions for recordable offences, or there is intelligence suggesting involvement in criminal activity, forces should consider:

- the likelihood that the applicant's performance of duty will be adversely affected, eg, 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 police service or police force.

- 7.8.2 A decision that an applicant is unsuitable on the basis of relatives' convictions, intelligence material or the applicant's criminal associations is to be made by the force vetting manager (FVM). The results of checks on relatives and associates should not be disclosed to an applicant.
- 7.8.3 Further information on spent convictions, cautions, reprimands and final warnings can be found on the NACRO website (please note that this is for guidance only and is not a definitive assessment of the ROA).

## 7.9 Financial Checks

- 7.9.1 These checks are used to assess whether applicants have been, are currently, or are likely to be in financial difficulty, or show signs of financial irresponsibility to the extent that they could become vulnerable to financial inducement.
- 7.9.2 Financial checks assess the applicant's financial position:
- at the point of initial application
  - as they apply to move into sensitive or designated posts
  - where further information is received in relation to debt issues.
- 7.9.3 Forces should recognise that a different approach should be taken with those applying at the point of entry into the police service from those applicants already in the organisation. This is because forces are better placed to risk manage those currently holding vetting clearance, owing to the pre-existing relationship and their history being known to the police service. Where applicants can demonstrate a history of managing their finances with responsibility, integrity and honesty, even if they have experienced debt problems, the final vetting decision can be made proportionately with regard to the vulnerability posed by any debt issue.
- 7.9.4 FVMs should not consider an applicant's financial position for existing staff in isolation. They should take a shared approach involving line managers and welfare, where necessary, and with appropriate and targeted aftercare in place.

## 7.10 Financial information gathering

### 7.10.1 Further information

### 7.10.2 Vetting interviews

7.10.3 Financial assessment is based upon information gathered via a financial questionnaire and a credit reference check. The financial questionnaire gathers information in seven areas:

- indications of previous financial unreliability
- problems meeting current commitments
- indications of poor financial judgement
- potential for future financial difficulties
- assets possibly inconsistent with income
- potential conflict of interests
- business interests.

7.10.4 When financial information has been provided in confidence as part of the vetting process, the risk of compromise is significantly reduced. Applicants should be reassured that there is no need to be concerned about mortgage and credit card commitments that are in line with their income, providing they meet these commitments. Debts only become a problem where they are substantial and individuals fail to take remedial action or where they are caused by compulsive behaviour, such as gambling.

7.10.5 Where forces note anomalies between an applicant's declarations and the information provided by the credit check, or where there is a need to clarify a particular issue, they should interview the individual concerned.

## 7.11 The financial scoring system

7.11.1 The financial scoring system used in the management vetting (MV)/non-police personnel vetting (NPPV) level 3 process supports the decision-making process. It allows comparison between the information that is contained in the financial questionnaire and that provided by a credit reference check.

7.11.2 Where the applicant declares financial issues in the application form, the financial vetting check should be made at the start of the recruitment process.

## 7.12 Financial checks for recruitment vetting

7.12.1 At the point of entry into the police service, financial checks identify potential vulnerabilities, eg financial difficulties among recruits. **Paragraph 4 of Schedule 1 to Police Regulations 2003** states that a member of a police force shall not wilfully refuse or neglect to discharge any lawful debt. This applies only to police officers, not police staff.

7.12.2 When considering an application for recruitment vetting (RV) clearance, applicants that can show they have and are adhering to debt management arrangements may be considered. Documentary evidence should be provided to demonstrate their commitment and adherence to any such debt management arrangements.

7.12.3 Applicants should not be considered if they:

- have existing county court judgments outstanding against them
- have been registered bankrupt and have not discharged their bankruptcy.

### 7.12.4 Individual voluntary agreement

7.12.5 FVMs should give careful consideration if a credit reference check reveals that an applicant has a current individual voluntary arrangement (IVA). Where an IVA repayment plan is in place, force vetting managers (FVMs) should satisfy themselves that the applicant has maintained regular payments over a number of months before making clearance decisions.

### 7.12.6 Defaulted payments

7.12.7 FVMs should give careful consideration if a credit reference check reveals that an applicant has defaulted on an account. Where debt management plans are in place, FVMs should satisfy themselves that the applicant has maintained regular payments over a number of months before making clearance decisions.

### 7.12.8 Bankruptcy

7.12.9 Applicants who have been registered as bankrupt and their bankruptcy debts have been discharged should not be considered until three years after the discharge of the debt. Debt relief orders (DROs) are treated in the same way as a bankruptcy.

7.12.10 Company debts

7.12.11 Former directors of insolvent limited companies who apply to the police force should be treated as if they were bankrupt even though the debts are in the company name.

## 7.13 Financial check considerations for serving personnel

7.13.1 Further information

7.13.2 Vetting interviews

7.13.3 Every force should have an unmanageable debt policy to further encourage existing personnel to report their financial difficulties. Forces should have welfare assistance in place to support personnel facing debt-related issues.

7.13.4 Where debt-related issues are identified for serving personnel as part of the re-vet process, FVMs should consider conducting an interview with the subject who may be supported by their staff association or trade union representative if they wish.

7.13.5 Indicators of potential financial vulnerability

7.13.6 Each application should be assessed using all available information and consider:

- the degree of risk presented by the amount and the ability to meet payment commitments
- the force's appetite for financial risk
- the force counter-corruption strategy.

7.13.7 When considering the financial vulnerability of applicants, FVMs should consider relevant issues, including:

- Is the applicant currently seeking credit? If so, the FVM should look at the number of searches.
- How many new credit accounts has the applicant opened in the last six months?
- Are these new accounts already at their limits?
- Are all cards up to their limit? If so, is the applicant making minimum payments only and are they managing on a month-to-month basis or are they living off credit and using it for everyday commitments?
- Is the applicant overdrawn on their current account or beyond their agreed overdraft limit? If so, is this regular, ie, do they rely on it to manage?
- Are there multiple or repeated arrangements showing on their credit file?
- Is there any evidence of payday loans?
- Any gone away information (GAIN) markers on their credit file?
- Is the applicant generally meeting commitments but with a poor payment history of missed and late payments?

7.13.8 A financial scoring template where applicable assists forces in assessing potential financial vulnerability.

7.13.9 When re-vetting, risk is reduced where the applicant openly declares debt-related issues and takes steps to address them. FVMs should clearly document all decisions, including their rationale.

7.13.10 If possible, the FVM should, with the applicant's agreement, refer the management of the problem within the workplace through the relevant line manager and welfare support, as opposed to a decision to refuse vetting clearance. If the applicant refuses to consent to such a management process, the FVM should consider withholding vetting clearance.

## 7.14 Financial check considerations for non-police personnel

7.14.1 Financial checks are required for non-police personnel vetting (NPPV) level 2 (full) and NPPV level 3. The same principles should be applied to this process as for the vetting of serving officers. It should, however, be noted that **Paragraph 4 of Schedules 1 to the Police Regulations 2003** only applies to police officers and not police staff or non-police personnel.

## 7.15 Financial checks for national security vetting

- 7.15.1 The current policy for NSV is detailed in the **Cabinet Office Security Policy Framework**. Financial checks form part of the SC (enhanced) and DV processes.
- 7.15.2 Forces should only initiate enquiries at security check (SC) (enhanced) or developed vetting (DV) level once MV clearance is granted. Where clearances are being considered consecutively, forces carry out the financial vetting check as part of the management vetting (MV) process.

## 7.16 Vetting interviews

- 7.16.1 Vetting interviews may be used to inform any type of vetting application, although they are likely to be more common for management vetting (MV). Not all applications require a vetting interview, but one should be conducted where vetting information raises questions or doubts about particular issues.
- 7.16.2 Interviews conducted as part of the process to grant national security DV clearance must only be conducted by suitably trained and accredited personnel.
- 7.16.3 The interview may be conducted on a face-to-face basis, but, due to the logistics of arranging this, telephone interviews can also be conducted.

## 7.17 Preparation for the vetting interview

7.17.1 Forces should conduct interviews after departmental, criminal, financial, and security record checks to ensure that the interviewer has all available information before the interview. Thorough interview preparation is essential. This means that the FVM must not only review all relevant information but must also seek to establish an appropriately professional relationship with the applicant before the interview. Appropriate pre-interview communication sets the tone for all subsequent contact.

- 7.17.2 If a vetting interview is conducted before all relevant information is available, it may be necessary to conduct a second interview if there are unresolved concerns.

## 7.18 Conducting the vetting interview

- 7.18.1 The FVM should take time to explain to applicants both the principles and process of vetting procedures, and the necessity for enquiries to cover each of the areas. They should explain the reasons for the interview and the sensitive nature of some of the questions and seek consent to proceed. If an applicant indicates that they find it difficult to discuss a matter, every effort should be made to discover whether the process might be made easier by using a different interviewer (eg, one of the same sex as the subject). The FVM should accommodate and document such requests wherever practicable.

- 7.18.2 The information below has been developed from professional experience.

### 7.18.3 Establishing rapport and cooperation

- 7.18.4 To obtain and retain a subject's full cooperation, interviews must not become an interrogation but should be handled with sensitivity. Interviewers must emphasise that information revealed during a vetting enquiry is confidential. The way in which FVMs deal with sensitive information dictates the extent to which people will entrust them with it. Those conducting the interview should never make assumptions or display a judgemental stance and, while appreciating the sensitivity and importance of the interview, they must display neutrality.

- 7.18.5 The interviewer should remember that the applicant is being asked to speak about matters which they might not even discuss with close family and friends. It is, therefore, important to establish a rapport with the subject. The manner and style of communication used by the interviewer may have a greater impact on the cooperation of the individual than any verbal assurances of confidentiality.

### 7.18.6 Beginning the interview – the importance of honesty

- 7.18.7 The success of the vetting interview, as with other aspects of vetting, depends largely on the honesty of the subject. FVMs must make clear to the applicant at the beginning of the interview that absolute honesty is required and that deceit at any stage of the process may affect their application. Lying, concealing the truth, or deliberately withholding information when completing application/vetting forms

or during a vetting interview is a very serious matter, whether it comes to light immediately or at some later stage.

7.18.8 The FVM should make clear that, if applicants provide information which may cause security concerns, it does not necessarily mean that their application will be declined and that each case will be considered on its merits.

#### 7.18.9 Reviewing the information provided

7.18.10 The applicant should be taken through the forms they have completed and asked whether there are any inaccuracies which they wish to correct or if there have been any changes in circumstances since completing the forms.

#### 7.18.11 Checking understanding

7.18.12 The interviewer should make sure that the applicant has understood all the questions asked. They should pay particular attention to those questions concerning criminal convictions, security information and financial circumstances. The interviewer should be consistent and cover the same relevant areas with all applicants.

#### 7.18.13 Questioning

7.18.14 The areas to be explored vary between applicants but may include one or more of the following:

- career to date, including satisfaction/dissatisfaction with the employer
- relationships (eg, marriage or co-habitation, family, friends and associates)
- personal circumstances (eg, domestic arrangements)
- lifestyle (eg, foreign travel and contacts, drug and alcohol use, hobbies, sports, study)
- criminal activity
- personal beliefs (eg, political extremism)
- actual or potential conflicts of interest
- financial circumstances.

7.18.15 Interviewers should also be prepared to be flexible to meet unexpected demands. Allowing the applicant free rein to express their views can be a useful source of information.

7.18.16 The rationale for discussing sensitive matters should be fully explained at a vetting interview to satisfy the applicant that these issues in themselves would not preclude a successful vetting process. The focus of the questions must be on those areas linked to the decision-making process. The interviewer should avoid seeking unnecessary detail on irrelevant issues.

7.18.17 If an applicant refuses to discuss a relevant matter, the interviewer should point out that the force will have no alternative but to take this into account in reaching a decision. This might lead to the refusal of clearance.

#### 7.18.18 Additional considerations:

- The FVM should approach questions relating to a subject's disability, religion or belief, race or another **protected characteristic** with caution, and avoid them unless absolutely necessary to facilitate the vetting process. Forces must be particularly aware of the potential for direct discrimination.
- Any issues relating to the subject's health should be referred to occupational health for a recommendation.
- FVMs should ensure that legislative constraints, such as the **Data Protection Act 1998** and **government security classification** (GSC) are not breached throughout the interview process.

#### 7.18.19 Concluding the interview

7.18.20 FVMs should always conclude the interview by establishing that the applicant is content with the manner in which it has been conducted. This provides an opportunity to clear up any misunderstanding, provides feedback about the performance of the interviewer and reduces the likelihood of a subsequent complaint.

#### 7.18.21 Reports and note-taking

7.18.22 Subsequent reports or interview notes should be free of subjective value judgements. They should include the rationale and evidence for making or reaching a particular decision or conclusion. Reports should be shared on request with the applicant unless there is a specific reason not to.

## 7.19 Transferees and rejoiners

7.19.1 Forces must ensure that the integrity of the individual wishing to transfer into the force or rejoin is beyond question and that there are no outstanding complaints or matters currently under investigation.

7.19.2 The following guidance applies to:

- police officers and special constables transferring from one police force to another
- police officers, special constables and police staff who have resigned or retired from the police service and wish to rejoin at a later date.

7.19.3 The above information does not apply to those who have been absent from their force for a significant period of time on medical grounds. The FVM reserves the right to require a full re-vet in place of a vetting health check.

## 7.20 Transferees with management vetting clearance

7.20.1 Individuals with MV clearance who transfer to a non-designated post retain their vetting clearance for up to 12 months from the date of transfer from the designated post. At that time the clearance will lapse. Regular security reviews and aftercare no longer applies after individuals leave an MV post. If they transfer back to an MV post within 12 months of leaving, their MV clearance remains valid until the renewal period, subject to a regular security review.

7.20.2 If an individual with MV clearance transfers to another force or agency, the vetting status remains valid until the renewal date, subject to the satisfactory completion of a regular security review form, for the information of the receiving force, and a vetting health check. The receiving force retains the right to require an individual to complete the full MV process where there is a specific need to do so.

## 7.21 Transfer during or after professional standards investigations

7.21.1 Where officers transfer between forces, their previous vetting file(s) should transfer with them. If an officer applies to transfer forces and fails to declare a criminal matter (which their parent force was unaware of), their application will fail. It may also lead to an additional misconduct hearing, and possible dismissal, from the current force. In such cases, the parent force should be made aware of the issues identified during the vetting process.

7.21.2 There have been occasions where the parent force has instigated a service confidence procedure, or similar, for transferees who had commenced duty in the receiving force. This occurred as a result of the parent force raising concerns about the person's honesty and integrity. In some cases, the motivation for the transfer may have been to avoid detection within the parent force, (where they may be the subject of active PSD investigations). In these circumstances, transferees are likely to be required to return to their parent force to attend hearings in respect of serious disciplinary offences. Where an individual is subject to a complaint or conduct investigation that is not yet complete they should not be allowed to transfer without the permission of the appropriate authority for the force in which they are serving.

## 7.22 Return following dismissal or secondment

7.22.1 Where a police officer or special constable has been dismissed and subsequently reinstated by a police appeal tribunal, the start of appointment cannot be delayed in the absence of security vetting. In this case, the PSD are notified if the individual returns to work and subsequent vetting checks reveal adverse information covering the dismissal period, or any other adverse information which was not previously known.

7.22.2 PSD consider if the person has breached regulations or their conditions of service and take action accordingly. If the adverse information relates to national security vetting (NSV), consideration should be given to withdrawing NSV clearance. The individual, however, may have a right to access the SVAP process.

7.22.3 If a member of police staff is dismissed but then reinstated following an employment tribunal, the circumstances of each case need to be considered individually.

7.22.4 FVMs must notify the PSD if police personnel return to work from secondment and vetting checks reveal adverse information covering the secondment period. PSD consider whether or not the individual has breached regulations or their conditions of service and take action accordingly.

## 7.23 Further information regarding minimum checks

### 7.23.1 Police intelligence records

7.23.2 The applicant's name, current home address and any addresses resided at in the past five years must be searched for on intelligence/information records and other non-conviction databases. Checks should also be conducted on the current home address of all individuals named on the vetting questionnaires and those who come to notice during the vetting process.

7.23.3 Any intelligence or information about the applicant, family members and home addresses revealed by these checks is classified and assessed using the intelligence report (formerly known as the 5x5x5).

7.23.4 When a police officer, special constable or member of police staff is dismissed, resigns or retires during the course of, or in anticipation of, gross misconduct proceedings, a flagstone record must be created on the force intelligence system. This ensures that the intelligence will be detected as a result of a PND check.

### 7.23.6 Police National Database

7.23.7 Forces should use the PND to carry out national intelligence checks on the applicant and others as above. They should also check the applicant's home address.

7.23.8 If the PND is not available for vetting purposes and the applicant has resided outside the force area they are being cleared to work in, that force should contact the force area where the individual has resided, at any time, in the last five years.

## 7.24 Other force intelligence

### 7.24.1 Records management check

7.24.2 Details of the applicant, their partner, applicant's parents and other close family members, associates and any other person residing with the applicant should be checked against historical investigation files. Generally speaking, there is no need to call for a file when the applicant is shown as the victim of a crime. In all other cases, however, it is recommended that the file is reviewed.

### 7.24.3 Crime report information system

7.24.4 Forces should check details of the applicant, their partner, parents and other close family members, associates and any other person residing with the applicant against the suspect and accused records. Searching the applicant's address will identify allegations of crime affecting other people residing with the applicant.

#### 7.24.5 Professional standards check

7.24.6 If an applicant has any previous police service, either as a police officer, member of police staff or special constable, their details should be forwarded to the relevant PSD(s). This allows checking against professional standards complaints, misconduct and intelligence databases as part of the vetting process. This also includes a counter-corruption check.

7.24.7 The check should be carried out with the force the applicant worked for or was deployed with as well as with the force the applicant has applied to.

#### 7.24.8 Electoral register check

7.24.9 Forces should check details of the applicant's address against the electoral register. Applicants who are not shown on the register should have their previous address checked. If the applicant is not shown on the electoral register, they should be contacted to establish further information. Forces should consider additional identity checks for applicants not shown on the electoral register.

7.24.10 A check of the electoral register can be obtained through a credit reference check.

#### 7.24.11 Checking security files

7.24.12 Forces must check vetting databases to establish if the applicant has ever held security clearance with the home force and if there were any security breaches or incidents relating to that clearance period.

#### 7.24.13 Credit reference checks

7.24.14 The information provided in the questionnaire should be compared with the results of a credit reference check.

7.24.15 Certain financial issues should result in rejection while others may require aftercare interventions.

#### 7.24.16 Interviewing applicants

7.24.17 Applicants may be interviewed where necessary in order to clarify queries, ambiguities or concerns raised during the vetting process.

#### 7.24.18 Referees

7.24.19 Checking references falls to the recruiting authority/unit and is completed as part of the recruitment function by HR.

#### 7.24.20 Assessing medical needs

7.24.21 Forces should take great care when considering information which relates to medical issues revealed as part of the vetting process. Neither police officers nor FVMs are qualified to assess medical conditions including mental health. Therefore, any medical information such as intelligence reports or allegations revealed as part of the vetting process must be passed to the force medical officer (FMO) or occupational health unit for a full professional assessment.

7.24.22 Following such an assessment, the FMO or occupational health unit should decide if the applicant is suitable for appointment in the force. Under no circumstances should any medical information be passed to FVUs.

#### 7.24.23 MOD checks

7.24.24 Ministry of Defence (MOD) checks should be carried out where the applicant has previous employment within HM armed forces.

#### 7.24.25 Special Branch checks

7.24.26 Special Branch enquiries are made against the applicant, partner, family and co-residents regarding domestic extremism and counterterrorist information.

#### 7.24.27 Open-source checks

7.24.28 Forces should check content on publically available social media sites for the purposes of service reputational reassurance and compatibility with the Code of Ethics.

#### 7.24.29 Biometric vetting (where applicable)

7.24.30 See biometric vetting.

### 7.25 Reviewing checks and enquiries

7.25.1 At this stage, forces should conduct a review of the results of all enquiries and checks. A report outlining all adverse traces and other relevant information arising from the vetting enquiries should be passed to the vetting decision-maker.

### 7.26 Information relating to the subject

7.26.1 Where information and intelligence relates to the applicant, forces should apply a two-stage test:

1. Are there reasonable grounds for suspecting that the applicant, a family member or other relevant associate:

- is or has been involved in criminal activity
- has financial vulnerabilities (applicant only)
- is or has been subjected to any adverse information?

2. If so, is it appropriate, in all the circumstances, to refuse vetting clearance?

7.26.2 The existence of criminal convictions would clearly indicate reasonable grounds for concluding that the applicant is, or has been, involved in criminal activity. Intelligence and other non-conviction information may also lead to reasonable grounds for suspecting involvement in criminal activity.

7.26.3 **Forces should assess such information on a case-by-case basis, taking into account the exact circumstances of the case and nature of the information revealed.**

## 7.27 Factors requiring particular scrutiny

7.27.1 While each case needs to be considered on its own merits bearing in mind the role and assets to be accessed, where any of the following factors are present the case should receive particular scrutiny. In most cases the presence of one of these factors will properly lead to a vetting rejection. In cases where one of the following factors is present but it is decided this should not lead to a vetting rejection (perhaps because mitigating measures can be applied), the full rationale must be recorded and the decision approved by the force vetting manager.

- past infringement of security or vetting policy or procedures
- significant or repeated breaches of discipline
- providing false or deliberately misleading information, or omitting significant information from the vetting questionnaires
- unauthorised association with people with previous convictions or reasonably suspected of being involved in crime
- other identified areas of concerns, for example, drug and alcohol misuse
- abuse of position
- previous breaches of the **Code of Ethics**
- professional standards intelligence
- financial vulnerability
- identified conflict of interest
- other inappropriate behaviour which impinges on a person's suitability to serve in the role.

## 7.28 Circumstances which may impair judgement

7.28.1 The following factors can impair an individual's judgement, which may lead to them being vulnerable to pressures or bribes:

- financial difficulties or unmanageable debts

- misuse of alcohol
- gambling
- misuse of controlled or prescribed drugs
- when the FMO certifies that appointing an individual to such posts could present a risk to the confidentiality, integrity or availability of intelligence assets. In these circumstances the FMO advises the post holders to notify their immediate or senior supervisors, and the FMO notifies the FVM of their decision.

## 7.29 Assessing the criteria for trustworthiness

7.29.1 Before forces grant clearances, the following factors should be taken into account:

- security implications of any adverse information obtained during the vetting process (for example, it may be necessary to give greater weight to some factors more than others)
- significance of any past conduct or circumstances
- distinctions between isolated or minor blemishes on an individual's record and information pointing to habitual or significant vulnerabilities.

## 7.30 Untested allegations

7.30.1 Where the vetting decision is based solely on untested allegations (recorded in the form of intelligence), forces should put the allegations to the applicant and allow them to respond. This can be done by way of face-to-face interview, telephone interview or letter.

7.30.2 Forces must take care where revealing the allegations could reveal a source, threaten the wellbeing of a third party or compromise an operation or investigation. In such circumstances, forces should make the vetting decision without giving the vetting applicant the chance to respond.

7.30.3 Where forces decide not to put the information to the vetting subject, they should record the rationale for doing this on the vetting file.

## 7.31 Information relating to third parties

7.31.1 When information about an individual (other than the subject) has been supplied or uncovered during the vetting process, they are known as a third party and can include:

- parents
- partners
- siblings
- children
- extended family
- partner's extended family
- cohabitants
- business partners
- known associates including individuals with whom they have significant financial arrangements.

7.31.2 Where adverse information relating to a third party is revealed, consideration must be given to the risk that this information poses to the force, the individual and the public.

7.31.3 If there is potential risk from third parties, forces must consider these cases on their individual merits. The guidance contained in convictions and cautions considerations does not apply to the conviction histories of third parties.

## 7.32 Factors which support granting or refusing clearance

7.32.1 Each case must be decided on its own merits, taking all relevant information into account. The following factors should be considered when deciding to grant or refuse clearance.

### 7.32.2 Factors against granting clearance

- evidence of joint enterprise
- currency of convictions/cautions of the third party
- currency of intelligence relating to the third party
- gravity of offences committed by the third party
- nature of the relationship between the subject and the third party
- financial relationship between the parties.

### 7.32.3 Factors supporting granting clearance

- evidence of distance between the subject and the third party
- currency of convictions/cautions of the third party
- currency of intelligence relating to the third party
- gravity of offences committed by the third party
- openness of the subject
- ignorance of the third party's activity.

## 7.33 Biometric vetting

7.33.1 Biometric vetting for police officer and special constable applicants is codified within Regulation 10A of the Police Regulations 2003 (as amended by the **Police (Amendment No. 3) Regulations 2012**) and **Regulation 1ZA of the Special Constables Regulations 1965**.

7.33.2 Biometric vetting checks should be undertaken on candidates who have reached the stage of being conditionally offered an appointment, following satisfactory completion of all other stages of the recruitment and vetting process. It should be conducted on those applying for the position of police officer or special constable (though not those transferring forces).

7.33.3 The purpose of biometric vetting is to determine whether:

- the individual has come to police attention
- if so, whether that was under the identity being used for their application
- the individual is linked to any outstanding crime scene marks or stains.

7.33.4 There is no legal requirement for biometric vetting to be conducted on police staff. Police staff posts, however, which are intrinsically frontline-facing and/or involve considerable time spent with the public, should be subjected to biometric vetting. Forces should conduct an audit of police staff posts and identify those for which biometric vetting is proportionate and justifiable.

## 7.34 Consent

7.34.1 The police service should be transparent throughout its recruitment process and literature. Prospective candidates from the earliest stages of recruitment should be aware that if successful, they will be asked to consent to providing their fingerprints and a DNA sample. These are checked against the relevant local and national databases before commencing employment.

7.34.2 Fingerprints and DNA are required to be provided following expressed consent being given by the prospective appointee, for the following purposes (this does not apply to those transferring to another police force):

- a speculative search
- retaining fingerprints on the police elimination database (PEDb) until an individual leaves the police service
- retaining a DNA profile on the Centralised Elimination Database (CED) until 12 months after the date the individual leaves the police service.

7.34.3 Express consent should be obtained before undertaking biometric vetting checks.

7.34.4 See the sample letters below:

- sample letter to prospective police officers/special constables: taking of fingerprints and DNA

- sample letter of consent to be returned signed by prospective police officers/special constables: taking of fingerprints and DNA
- sample letter for issue to prospective PCSOs/police staff: taking of fingerprints and DNA
- sample letter of consent to be returned signed by prospective PCSOs/police staff: taking of fingerprints and DNA.

### 7.35 DNA and fingerprints

- 7.35.1 Only one DNA sample and one set of fingerprints are required. Upon checking and appointment, the DNA profile (derived from the DNA sample) is held on the Centralised Elimination Database (CED). Fingerprints are held on the Police Elimination Database (PEDb).
- 7.35.2 Where the searches are negative, the appointment of the individual can progress normally. Where the results of the searches are positive, the relevant FVM is notified for appropriate action to be taken. Appointment of the individual will be held in abeyance until such time as any issues emanating from the positive result have been satisfactorily resolved. The ultimate decision as to whether to recruit or not is made by the chief officer.
- 7.35.3 Where positive searches related to serving police personnel (eg, a member of police staff applying to become a regular police officer or a special constable), a referral is made to the relevant PSD for consideration to be given to the initiation of a misconduct investigation.

### 7.36 Destroying records

- 7.36.1 If a satisfactory DNA profile is derived from a DNA sample, then the sample must be destroyed within six months of it being taken.
- 7.36.2 Where applicable, fingerprints and DNA profiles are retained as hard copies (with case papers) until the conclusion of any outstanding investigation or impending legal proceedings, in case they need to be disclosed.

## 7.37 The clearance decision

- 7.37.1 The primary options available are to either grant or refuse clearance. Additional research, vetting enquiries or a vetting interview can, however, be conducted before a decision about vetting clearance is made. It may be appropriate in certain circumstances to grant clearance subject to restrictions, such as geographical or other posting restrictions. The decision-maker, usually the FVM, should review the case and decide whether or not to grant clearance. Before making a final decision, the decision-maker may ask for additional checks or enquiries, such as calling the applicant in for an interview or asking for personal referees.
- 7.37.2 The vetting file should be clearly marked with the clearance decision, and the vetting decisions should be supported by an explanation of the rationale. Difficult or complicated cases should be passed to the next level of vetting unit management for advice. Owing to the length of the recruitment process, some individuals may not be appointed for several months after their application is received.
- 7.37.3 Forces should take care when considering information revealed as part of the vetting process which relates to an individual's mental or physical health if this indicates a vulnerability which could result in the applicant being unsuitable for appointment by the force. Neither police officers nor FVMs are qualified to assess medical conditions or mental health. Any medical information, such as intelligence reports or allegations, revealed as part of the vetting process must be passed to the FMO or occupational health unit for a full, professional assessment.
- 7.37.4 Following assessment, the FMO or occupational health unit should decide if the applicant is suitable for appointment by the force. Under no circumstances should any medical information be passed to force vetting units (FVUs).

## 7.38 Communicating the decision

- 7.38.1 Sample letter for failing the police vetting process
- 7.38.2 If vetting clearance is refused or withheld, the vetting applicant must be informed of the reasons, unless there is valid reason not to do so. Where forces cannot provide the full rationale, they must give as much information as possible. Forces must also inform the applicant that the decision not to provide the full reasoning has been made following careful consideration. Forces can withhold the rationale for the decision if it would:

- damage national security
- result in the force breaking any law
- frustrate the prevention or detection of crime
- impede the apprehension or prosecution of offenders
- result in the disclosure of sensitive information
- breach the confidentiality of any information provided in confidence.

7.38.3 Correspondence with the vetting applicant should state that the decision has been made in accordance with APP Vetting and the guidance should be referenced. The vetting applicant must be informed of their right to appeal against the decision to withhold or refuse clearance.

### **7.39 Recording of applicants receiving vetting clearances where criminal behaviour has been identified**

7.39.1 A full rationale should be recorded when granting vetting clearance to police officers and some police staff with previous convictions, cautions and other disposals. It should be recognised that the vetting clearance may not be transferable to other police forces or agencies.

7.39.2 Forces should ensure that any applicant accepted for a role that involves the evidential chain should be recorded on a system that is easily searchable for FOI or other enquiries. It is recommended that the force Centurion system or other appropriate recording system is used.

### **7.40 Refusing and withdrawing clearance**

7.40.1 Vetting clearances can be refused or withdrawn at any level.

7.40.2 Where recruitment vetting (RV) clearance is withdrawn, the force must consider whether the identified risk(s) can be mitigated by placing conditions on clearance and/or using close supervision. When an MV is withdrawn, the force must consider alternative deployment to a role where the withdrawn clearance level is not required. In such circumstances, forces must also assess the subject's continued suitability to hold RV clearance.

7.40.3 The vetting applicant can request in writing an appeal against the decision. On appeal, the applicant has the right to ask for the rationale behind the decision and should be provided with the information if the following applies:

- there is no risk to national security
- no laws are broken
- it does not frustrate the prevention or detection of a crime
- it will not impede the apprehension or prosecution of offenders
- it will not result in the disclosure of sensitive information
- it will not breach the confidentiality of any information provided.

7.40.4 Where NSV clearance is withdrawn by forces, information regarding an appeal to SVAP should be given to the individual. If an individual refuses to engage in the vetting process, their vetting clearance should be refused or withdrawn.

## 7.41 Employment Rights Act 1996 and Police (Performance) Regulations 2012

7.41.1 For police staff, withdrawing vetting clearance may lead to dismissal under section 98 of the Employment Rights Act 1996 (ERA). This would ultimately occur when the force decides that alternative employment is not possible and/or the risk cannot be managed.

7.41.2 The ERA does not apply to police officers. Therefore, when clearance is withdrawn, suitable alternative employment cannot be identified, and/or the risk cannot be reasonably managed, the force should consider proceedings under the **Police (Performance) Regulations 2012**.

7.41.3 When a police officer's vetting clearance is withdrawn, they will be unable to access police information and systems. Unsupervised access to police premises will also not be permitted. As a result, the police officer will be unable to perform their role to a satisfactory level. This could, therefore, amount to gross incompetence and a third-stage meeting should be considered.

## 7.42 Suspension of clearance

- 7.42.1 Where adverse information is revealed after clearance has been granted, it may be appropriate for forces to suspend vetting clearance. Forces will only do this following a review of all relevant information known at that time.
- 7.42.2 For force vetting levels, the vetting applicant is given the opportunity to make representations against the initial decision to suspend clearance, and at any time during the course of suspension. This takes place if they reasonably believe that their circumstances have changed and suspension is no longer appropriate.
- 7.42.3 Where clearance is suspended, forces should risk assess the situation and consider appropriate redeployment, depending on the individual circumstances of the case.
- 7.42.4 Forces will review suspended clearances at least once a month to ensure that the reasons for the suspension are still valid. A review is carried out to check that the suspended clearance is still appropriate. Vetting clearance will not be suspended for any longer than is necessary and reasonable.

## 7.43 Appeals

- 7.43.1 An appeals process must be made available where vetting clearance, at any level, is refused or withdrawn. This does not apply to NSV for external applicants, although it would be considered good practice to do so.
- 7.43.2 An appeal may be made by the applicant in writing stating their grounds of appeal when one or more of the following factors apply:
- further information is available that was not considered by the decision-maker
  - the vetting rejection was disproportionate considering the circumstances or details of the case
  - the decision was perverse or unreasonable
  - no explanation has been given for the decision.
- 7.43.3 The applicant must explain why the grounds apply in their particular case.

#### 7.43.4 Conducting appeals

7.43.5 Appeals may be conducted by an individual of suitable seniority who:

- is independent of the original decision-making process
- has not been previously involved in any aspect of the case
- has a working knowledge of vetting.

7.43.6 This will ensure that the transparency and integrity of the appeals process is maintained.

7.43.7 Decisions that are made on appeal are final.

#### 7.43.8 Existing police personnel

7.43.9 Where clearance is refused or withdrawn for existing police personnel, they can appeal if one or more of the above factors apply. Personal representations may be allowed, but this is at the discretion of the individual considering that appeal. Support will be available from staff associations and trade unions.

7.43.10 Transfers between forces are voluntary arrangements with no automatic right of appeal. Where, however, the decision to discontinue the transfer application is based on vetting concerns, an appeal process should be made available.

#### 7.43.11 Other applicants

7.43.12 In most cases, the appeals process for other applicants is paper-based and the applicant can make written representations. Personal representation is allowed (at the discretion of the individual considering the appeal), but only if they are satisfied it will add value to the process.

7.43.13 All appeals are dealt with as promptly as possible.

### 7.44 Flagstone records

7.44.1 A particular risk to the police service is the re-employment or appointment of individuals who have been dismissed, have resigned or retired while the subject of a misconduct investigation. To counter this, a flagstone record must be created on local intelligence systems. The head of PSD should consider all available information and determine whether or not a flagstone record is required.

7.44.2 See:

- PSD process for creating a flagstone record
- **Police National Database Flagstone Submission Guidance 1.2 (Redacted).**

## 7.45 Aftercare

7.45.1 Vetting is based on a 'snapshot in time' and because an individual's circumstances can change, it is important that their ability to maintain their security clearance is assessed. A comprehensive aftercare regime allows such assessments to be made. Aftercare, therefore, is an important part of any vetting process and is the responsibility of the vetting subject and the FVM.

7.45.2 All individuals who are subjected to the vetting process must report any changes in their personal circumstances. This can include changes in marital status or civil partnership, name or address and financial status, such as a county court judgment or participation in a debt management plan. Failing to do so may result in their vetting clearance being downgraded or withdrawn. To enable sensitive and honest disclosures to be made during the aftercare regime, it is important that there are confidential processes in place.

7.45.3 In addition to making disclosures after vetting clearance has been granted, individuals holding MV clearance should be subjected to a regular review. Forces should have a programme in place to ensure that all posts are subjected to review during the lifetime of the clearance. See sample annual security form.

7.45.4 The FVO reserves the right to conduct personal interviews for any relevant change in circumstances following the awarding of the initial vetting clearance.

## 7.46 Aftercare for non-police vetting

7.46.1 NPPV level 1, NPPV level 2 (abbreviated) and NPPV level 2 (full) do not require aftercare but NPPV level 3 does. Changes in the personal circumstances of individuals holding NPPV clearance may, however, affect their continued suitability to hold that clearance. They must, therefore, report in writing to the FVM any relevant changes, including spouses or partners, changes of address, criminal associations, or other matters relating to the risk factors.

7.46.2 Forces may review or renew NPPV clearance before the review or renewal date, if adverse information comes to light relating to the subject, or there is a material

change in an individual's personal circumstances.

7.46.3 Forces should inform individuals that adverse changes in circumstances, or failure to report such changes, could result in the withdrawal of their vetting clearance.

## 7.47 Renewing clearance

7.47.1 Specified levels of clearance are for a limited period and require renewal after that period has elapsed. The table below summarises the periods at which different vetting clearances should be reviewed as a minimum.

Clearance level	Renewal period
RV	10 years
CTC	10 years 5 years for non-police personnel
MV	7 years
SC (for police personnel)	10 years
SC (for non-police personnel)	5 years
DV	7 years
NPPV 1	up to 3 years
NPPV 2 (abbreviated)	3 years
NPPV 2 (full)	3 years
NPPV 3	7 years

7.47.2 A renewal of vetting clearance requires a full application to be completed and all required checks pertinent to that particular level of vetting must be redone.

## 7.48 Reviewing vetting clearance following misconduct

7.48.1 When misconduct proceedings have concluded and the officer or member of staff is not dismissed but has been issued with a written warning or a final written warning, a review of vetting clearance should be carried out. The review includes a consideration of the applicant's suitability to maintain the level of clearance held and to continue in the post they occupy.

## 7.49 Transferring vetting clearance

7.49.1 All vetting clearances completed in accordance with the Vetting Code of Practice and APP Vetting are transferrable between forces and also between posts within a force, either through lateral movement or promotion. The full vetting file with the clearance transfers between forces.

7.49.2 A vetting health check must be completed before a transfer of clearance. The FVM reserves the right to require a full re-vet in place of a vetting health check where there is a specific need to do so.

## 7.50 Vetting health checks

7.50.1 As a minimum, vetting health checks should have PNC, PND, professional standards, counter-corruption and credit reference checks conducted on the vetting applicant. Health checks should also consider any risks that were previously identified, such as those associated with geographical location, concerning the applicant and third parties.

## 7.51 Safeguards

7.51.1 If a vetting clearance is granted to an individual who has risks and/or vulnerabilities associated with them, it does not establish a precedent. The vulnerability may mean that the clearance cannot be subsequently transferred to another post. Similarly, where clearance has been granted and there are identified risks, this does not establish a precedent either. Subsequent reassessment of that risk on renewal or review of clearance is not bound by the previous decision.

7.51.2 Where a decision is made to grant clearance following a risk assessment, safeguards should be put in place to minimise the risk posed.

## Vetting interview

7.51.3 Where practicable, forces should conduct a vetting interview with the applicant to:

- ascertain the exact nature of their relationship with the third party
- assess their level of knowledge of the third party's activity.

## 7.51.4 Disclosure

7.51.5 In extreme cases, it may be pertinent to disclose the information relating to the third party to the applicant. Such a decision should only be made following authorisation from the force data protection officer having considered all ramifications, including legislative constraints such as the **Data Protection Act 1998** (DPA) and **GSC**. Information obtained from external agencies should not be disclosed unless authority to do so has been obtained from those agencies.

7.51.6 If a vetting clearance is granted to an individual who has risks and/or vulnerabilities associated with them, it does not establish a precedent. The vulnerability may mean that the clearance cannot be subsequently transferred to another post. Similarly, where clearance has been granted and there are identified risks, this does not establish a precedent either. Subsequent reassessment of that risk on renewal or review of clearance is not bound by the previous decision.

7.51.7 Where the applicant has omitted to declare an individual whose details are required on vetting forms and adverse information is held about that individual, the assumption should be that the details have been deliberately omitted and this should be treated as a potential integrity issue in the first instance.

## 7.52 Maintaining records

7.52.1 Forces should maintain a vetting file to record:

- information provided by the vetting applicant
- the results of vetting enquiries
- the rationale for refusing, suspending or granting clearance (with restrictions)
- Where adverse information has been revealed and considered.

- 7.52.2 In cases where the full rationale for the decision cannot be provided to the vetting applicant, forces should prepare an open decision sheet suitable for disclosure to the vetting applicant (on request) and a separate closed decision sheet to be kept on file. The open record should contain as much information as possible in relation to the rationale, even if this is only summary information. In such cases, a record of the considerations of which information is suitable for disclosure should also be kept with the vetting file.
- 7.52.3 Vetting files can be stored as a hard copy or electronically and must be maintained securely. Access should be limited to those who have an operational need. Vetting files should be stored separately to personnel files due to the sensitivity of material contained in them.
- 7.52.4 Vetting files should be kept for no longer than is necessary (see **APP Information Management**). The content of vetting files may be disclosable during the course of legal proceedings and any police misconduct investigations.

### 7.53 Re-joining the service

- 7.53.1 Individuals who apply to re-join the service after being dismissed, resigning, retiring or being made redundant, must be vetted to the appropriate level before being re-appointed or re-employed. Biometric vetting can be applied, where appropriate.
- 7.53.2 The only exception to this is those who have been dismissed and reinstated on appeal. Then individuals must be re-appointed or re-employed as soon as practicable. In these circumstances, the vetting cannot delay the re-appointment or re-employment. A re-vet is conducted following appointment and any adverse issues dealt with through the appropriate misconduct procedures.

### 7.54 Career break

- 7.54.1 Policies and procedures relating to career break and extended periods of absence are owned and administered by force HR departments. A career break is an extended period of leave from work that begins with an intention to resume working on an agreed date and is open to both police officers and police staff.

7.54.2 Individuals taking a career break continue to be regarded as serving police officers/employees of the force, and remain subject to the following:

■ **Police (Conduct) Regulations 2012**

■ the Code of Conduct for Police Staff police regulations and force conditions of service

■ the **Code of Ethics**

■ the Vetting Code of Practice

■ APP Vetting.

### 7.54.3 Process

7.54.4 Individuals who have taken a career break must submit a vetting application before their return. The application should be clearly marked indicating the length of time the police staff member or police officer has been on a career break together with the details of any time spent out of the country.

7.54.5 Police officers cannot be prevented from returning to duty from a career break. It is advisable, therefore, to ensure that any vetting process, if applicable and where possible, is completed before any return to duty.

7.54.6 If any adverse information likely to result in disciplinary action or misconduct proceedings is found or declared during the vetting process, the FVM should immediately notify the PSD. The vetting process may also identify aftercare requirements such as financial reviews. If the adverse information relates to NSV, the force should take appropriate measures, as outlined in the **SPF** formatting.

7.54.7 Forces should take a risk management approach as opposed to a risk averse one. They should take into account the fact that the individual has been duty-bound to report notifiable matters to the force during this period and also that the force has knowledge of the individual through their previous service.

## 7.55 Transferees and extended absence

- 7.55.1 Vetting clearance can be transferred between forces after a vetting health check has been completed. This must be conducted on individuals who have been out of force for 12 months or more. This can include individuals who have been on secondment, a career break or any other extended period of absence.
- 7.55.2 Forces can reserve the right to require a full re-vet of those who are applying to transfer or who are returning following an extended period of absence. Biometric vetting is not applied to officers who are transferring between forces or returning from a period of absence.

## 7.56 Internal moves

- 7.56.1 Individuals moving from one post to another, either through transfer or promotion, that does not require an enhanced level of vetting, do not need to be re-vetted as a matter of course. A vetting health check should, however, be conducted, consisting, as a minimum, of a PNC, PND, professional standards, counter-corruption and credit reference checks conducted on the vetting applicant. Health checks should also consider any risks that were previously identified, such as those associated with geographical location, concerning the applicant and third parties.

## 7.57 Business interests and secondary employment

- 7.57.1 Each force should have its own policy relating to secondary working and business interests for police officers, police staff and members of the Special Constabulary. The policy should be owned by either force HR Departments or the PSD. Managing business interests is not a vetting function, but consideration should be given to consulting with the FVM.
- 7.57.2 It is common practice for the head of the PSD to authorise applications for secondary employment or business interests. When considering applications, the head of the PSD (where it is believed to be appropriate) should consult the FVM.

7.57.3 The FVM considers the appropriateness of the secondary employment or business interest in relation to the level of vetting held. Considerations include, but are not limited to:

- nature of the business interest/secondary employment
- potential for a conflict of interest between the individual's role within the force and the business interest/secondary employment
- potential for the business interest/secondary employment to lead to future financial difficulties for the individual
- whether the business interest/secondary employment may require the individual to associate with known criminals/persons of interest to the police.

7.57.4 Each case must be assessed on its individual merits, taking all information into consideration. Where an individual's application is granted, they are to be reminded of their obligation to inform the relevant vetting authority of any significant changes in their circumstances.

# 8 Appendices

## 8.1 Background information

## 8.2 Force vetting forms

- Sample recruitment vetting form
- Sample management vetting form
- Sample non-police personnel level 1 vetting form
- Sample non-police personnel level 2 (abbreviated) vetting form
- Sample non-police personnel level 2 (full) vetting form
- Sample non-police personnel level 3 vetting form
- Sample annual security form.

## 8.3 Financial checks

- Sample financial scoring sheet.

## 8.4 Biometric vetting

- Sample letter to prospective police officers/special constables: taking of fingerprints and DNA
- Sample letter of consent to be returned signed by prospective police officers/special constables: taking of fingerprints and DNA
- Sample letter for issue to prospective PCSOs/police staff: taking of fingerprints and DNA
- Sample letter of consent to be returned signed by prospective PCSOs/police staff: taking of fingerprints and DNA.

## 8.5 Flagstone records

- Police National Database Flagstone Submission Guidance 1.2 (Redacted).

## 8.6 Communicating the decision

- Sample letter for failing the police vetting process.

---

## About the College

We're the professional body for everyone who works for the police service in England and Wales. Our purpose is to provide those working in policing with the skills and knowledge necessary to prevent crime, protect the public and secure public trust.

[college.police.uk](https://college.police.uk)



Follow us

**@CollegeofPolice**