

ACTION PLAN

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Ref.	Recommendation	Risk	Agreed	Management Response	Responsibility	Target Date
6.3	On the amalgamation of the vetting units, KPIs are set, agreed, monitored and appropriate action taken to address any targets that are not met.	M	Y	<p>Upon amalgamation a review of all KPIs will be completed with a view to implementing them across the whole unit. We will also discuss with other Forces, their KPIs, where they exist, in an effort to learn from their experiences.</p> <p><u>March 2010</u> - Units not yet amalgamated PSG have KPIs and ACPO are working on Force wide vetting KPIs. SO15 have implemented local KPI's</p> <p><u>October 2010</u></p> <p>Work is underway to review KPIs across the operation. On target to complete this work on Schedule.</p>	Head of Vetting Unit (SCD 26)	3 Months from date of amalgamation.
6.4.1	Management Board gives documented approval for the creation of the new centralised unit and for the establishment of an independent Departmental Vetting Officer.	M	Y	<p>The amalgamation was agreed between AC Yates and ACSO Quick.</p> <p>The MPS already has MetSec Board overseeing MPS Vetting Board which addresses the independent aspect highlighted in 6.4.1. The MPS also has a Departmental Security Officer [Bob Farley] as Head of Information Compliance who sits on the MetSec Board.</p> <p>Thus the role of Departmental Vetting Officer could effectively fall to MetSec Board.</p> <p><u>March 2010</u> - The amalgamation and location of a single unit has yet to be agreed.</p>	ACSC and ACSO	April 09

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				<p><u>June 2010</u> - In May 2010 SCD & SO management came to a provisional agreement for a merger under SCD. This was to have been confirmed at MB on 16/05/10 but the issue of the MPS being a 'gateway' for UK police vetting checks with SyS temporarily deferred ratification. MB on 30/06/10 will now be told that existing SyS arrangements will continue & no 'gateway' is required. This will allow MB to again consider ratifying merger of vetting units.</p> <p><u>October 2010</u></p> <p>On 1 October 2010 NSVU resources transferred to SCD26 forming a single MPS Vetting Unit, following the Management Board decision to create a single vetting unit on 5 may 2010.</p>		
6.4.2	<p>Senior management in the new unit develops a strategy for approval by Management Board that:</p> <ul style="list-style-type: none"> Supports national and corporate policy 	H	Y	<p>Agreed</p> <p>MPS Vetting Policy is closely aligned to ACPO National Vetting Policy [NVP] and Home Office Circular 54/2003. These documents are currently under review. Publication of v3 NVP will allow the MPS to carry out a full review of our policies. At this time we have no publication date.</p> <p><u>March 2010</u> - Vetting Board have agreed review of MPS policy to report in December 09. Ongoing to be completed by 31 March 2010</p>	<p>DCS SO15 and Head of Vetting Unit</p> <p>DCS SO15 and Head of Vetting Unit</p>	<p>3 Months from date of amalgamation</p> <p>As Above</p>

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	<ul style="list-style-type: none"> Includes clearly defined roles and responsibilities 		Y	<p><u>June 2010</u> - Final group review of revised MPS vetting policy SOPs complete, taking account of NPIA 01/2010 which replaced HO Circular 54/2003. Now requires presentation to Commander, then DLS approval, then Vetting Board sign off. Comparison with newly issued NVP ongoing.</p> <p>The management and staffing structure will be agreed prior to amalgamation and reviewed within 6 months.</p> <p><u>October 2010</u></p> <p>It was agreed that a single team will be formed to process all Management Vetting, SC and DV vetting cases prior to the amalgamation. This will create operation resilience; ensure constancy of decision making and processes, whilst removing duplication. A detailed transition plan is now being developed and includes ensuring all vetting cases in the MPS will be processed on one case management system for the first time. All changes should be implemented within 6 months of the transfer of NSVU resources to SCD 26. This work will also ensure that role and responsibilities are clearly defined.</p>	Head of Vetting Unit	April 2009
	<ul style="list-style-type: none"> Sets out governance arrangements including the remit of the Departmental Vetting Officer 		Y	<p>MPS Vetting Board, under Professional Standards Strategic Committee, was created in 2004. The relationship between MPS Vetting Board, MetSec Board and PSSC is unclear. Governance will be reviewed in discussion with the Chairs of each Committee/Board and published once agreed.</p>	DCS SO15	April 2009

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	<ul style="list-style-type: none"> Contains a requirement for designated Business Group vetting officers to identify the levels of clearance required for key posts within their BGs and to document clearly the rationale 		Y	<p>This is a major piece of work and will need to be undertaken once Management Board have agreed an overall strategy for the Vetting.</p> <p><u>March 2010</u> - Amalgamation has not been agreed. Business Groups have named individuals for the role and the Group will meet to discuss the way forward in the new financial year.</p> <p><u>June 2010</u> - DoI7(14), after discussion with PSG/NSVU, have documented vetting requirements for each role. This will be done for all Operational Technology Group and is a model for others to follow.</p> <p><u>October 2010</u></p> <p>A process to identify the vetting requirement for roles is being incorporated into the ongoing review of policy and procedures.</p>	Head of Vetting Unit	March 2010
	<ul style="list-style-type: none"> Sets out monitoring and review activities 		Y	<p>The proposed structure for the amalgamated unit will include a formal Quality Assurance/Support Unit.</p> <p><u>March 2010</u> - PSG have instigated a Performance & Review post at Band D level.</p> <p><u>October 2010</u></p> <p>Work is commencing to develop a formal quality assurance system for all vetting decisions. In addition, the support needs of</p>	Head of Vetting Unit	3 Months from date of amalgamation.

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	<ul style="list-style-type: none"> Is supported by appropriate, documented and approved corporate and local procedures Includes a requirement for KPIs to be set and monitored Includes guidance for the vetting of personnel who work for short periods of time. 		<p>Y</p> <p>Y</p> <p>N</p>	<p>the operation are also being identified.</p> <p>Will be supported by policies and procedures as appropriate.</p> <p><u>June 2010</u> - Final group review of revised MPS vetting policy SOPs complete. Now requires presentation to Commander, then DLS approval, then Vetting Board sign off.</p> <p><u>October 2010</u></p> <p>Policy and SOPs are now being refined following legal advice and feedback from senior stakeholders. A decision making framework and operations manual are also being developed. In addition, work is underway to develop a business plan for the new single unit, which will also capture the KPIs that will be monitored.</p> <p>Will include this requirement.</p> <p>See above.</p> <p>March 2010 - Both Units now have KPIs</p> <p>There is no requirement and this was previously accounted for with MetSec Personal Security Policy which was then superseded by the MPS Vetting Policy.</p>	<p>Head of Vetting Unit</p> <p>Head of Vetting Unit</p>	<p>3 Months from date of amalgamation</p> <p>3 Months from date of amalgamation</p>
6.4.3	Management checks are put in place to monitor compliance with appropriate, national and corporate	M	Y	Agreed	Head of Vetting Unit	3 Months from date of amalgamation

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	policies and procedures.			March 2010 - PSG have a performance and review post and PSMs dip sample cleared cases.		
7.1.1	The sponsor list held is reviewed and updated.	M	Y	Agreed. March 2010 - This work is an ongoing process. June 2010 - NSVU has list of SPOC/sponsors for each unit requiring NSV, but further work is required. PSG are also working towards a sponsor list.	Head of Vetting Unit	Work in progress.
7.1.2	Forms received with sponsor details that are not clearly shown or are not on the list are returned to the units.	M	Y	Agreed.	Head of Vetting Unit	With immediate effect
7.2.1	Each business group nominates a designated vetting officer who is responsible for identifying, in liaison with individual line managers, the posts within the business group that require higher level clearance and that they also: <ul style="list-style-type: none"> produce lists of designated staff posts and the clearance level required clearly showing the rationale used, 	M	Y	This work will need to be taken forward with Business Groups once strategy is agreed. However, as all MPS employees are vetted to IVC/CTC this requirement should only fall to those requiring MV, SC or DV.	Head of Vetting Unit	Ongoing
			Y	MPS Vetting Policy, SOP2 defines vetting levels and has an appendix extending to DPS and certain SCD posts but has not been updated since 2004. It will be reviewed and	Head of Vetting Unit	Ongoing

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	<ul style="list-style-type: none"> ensure that the level of clearance required is included in staff Job Descriptions, maintain details of clearance requests submitted to central vetting units. 		Y	<p>updated as necessary.</p> <p><u>June 2010</u> - DoI7(14), after discussion with PSG/NSVU, have documented vetting requirements for each role. This will be done for all Operational Technology Group and is a model for others to follow.</p> <p>In 2005 PSG directed that all adverts in notices should state the level of vetting required, if the level was above CTC. This needs to be reinforced by WorkForce Planning Unit and then extended for compliance.</p> <p><u>June 2010</u> - This now appears to be occurring. A recent initiative has also given applicants detail on timescales and rationale behind NSV.</p>	<p>Head of Vetting Unit Work Force Planning</p>	<p>With Immediate affect</p>
			Y	<p>Agreed.</p>	<p>Head of Vetting Unit</p>	<p>Ongoing</p>
7.2.2	<p>The centralised vetting unit undertakes sample checks, in liaison with Business Groups, to ensure that staff working for the organisation have been identified and vetted appropriately.</p>	M	Y	<p>It would be our intention to do this in relation to those posts vetted to higher than CTC.</p> <p>All MPS staff, post 1994, have been vetted to CTC. In 1994 Management Board made the decision that those pre 1994 would not require vetting unless they moved to a post which expressly stated the staff would required a specific vetting check.</p> <p>All new MPS staff cannot be issued with a pass without being vetted. In addition they cannot gain access to Aware without being vetted.</p> <p><u>March 2010</u> - This has yet to be completed</p>	<p>Band B/NSV</p>	<p>September 2009</p>

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				<p>and is delayed because of the lack of amalgamation.</p> <p><u>October 2010</u></p> <p>Policy and process to ensure all employees and contractors hold appropriate vetting clearance and being developed as part of the ongoing vetting policy review.</p>		
7.5	<ul style="list-style-type: none"> Each Business Group Vetting Officer maintains details of non MPS staff clearance requests submitted to the central vetting unit an independent central list of all non-MPS personnel is established by a designated individual in liaison with each Business Group the vetting unit compares a sample of individuals on this list against the access logs and their database of non MPS staff who have been security cleared 	H	Y	<p>This will need to be agreed with HR Directorate and progressed.</p> <p>As above</p> <p><u>March 2010</u> - The IAM project is developing a data base of itinerant workers.</p> <p>NSVU currently update MetHR when MPS Staff have been vetted and are working through back record converting.</p> <p>PSG in agreement with HR Recruitment update METHR with MSC and 10 year renewal results.</p> <p>Warrantor could be required to facilitate this purpose. However, MetHR is the ideal location for a central Db of all cleared persons but is only used for MPS employees not NPP. To achieve this will require HR Directorate to</p>	<p>Head of Vetting Unit/THR</p> <p>Head of Vetting Unit/THR</p> <p>Head of Vetting Unit/THR</p>	<p>December 2009</p> <p>December 2009</p> <p>December 2009</p>

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	<ul style="list-style-type: none"> a central database is maintained showing the security clearance status of all MPS staff and contractors. 		Y	<p>direct that NPP are placed on MetHR or a link between Warrantor, or a replacement Db, and MetHR.</p> <p>March 2010 - The IAM project is developing a data base of itinerant workers.</p> <p>June 2010 - ongoing Vetting Board action for PSG/NVVU and HR to discuss method by which supervisors can access staff vetting levels.</p> <p>As above</p>	Head of Vetting Unit/THR	December 2009
7.7.1	<p>Business Group designated Vetting Officers, in liaison with line managers, provides the Vetting Unit with details of:</p> <ul style="list-style-type: none"> personnel who require clearance renewal 	M	Y	<p>To consider whether this could be tied into the PDR system and if appropriate will do so.</p> <p>March 2010 - Individuals identified will meet in new financial year to progress issues.</p> <p>For MPS personnel other than for MV and NSV this is an issue for DPS, HR and line managers to resolve and manage.</p>	Head of Vetting Unit	September 2009.
	<ul style="list-style-type: none"> any change in circumstances that may affect an individuals' clearance. 			<p>NSVU have rolled out a SAF for SC and DV. The form has been adapted by NSVU for MV but is not used by PSG for MV. It is debateable whether issues pertaining to IVC clearance are matters for Vetting or HR/DPS. Removal of IVC would be of little use if the person is suspended and would seem bureaucratic if other management intervention is in place.</p>	Head of Vetting Unit	

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				It is very however very relevant to CTC/SC/DV/MV/EMV.		
7.7.2	All police and support staff are made aware of their responsibilities for informing vetting personnel of any change in circumstances that may affect their clearance status.	M	Y	Agreed March 2010 - This is an ongoing process.	Head of Vetting Unit	April 2009
7.8	The use of this enhanced security clearance level ceases until its status is further clarified and its use is formally approved at national level.	M	N	This is a misunderstanding. It is and always has been ACPO NVP that all staff undergoing SC undergo MV first. SC entitles staff to access Secret and, occasionally, Top Secret material. Previously it has been MPS practice for Non Police Personnel to undergo IVC prior to SC. However, previously, NSVU only applied NSV and no additional Force Vetting checks, this was identified as a risk. Thus NSVU 'enhanced' the check as per ACPO NVP and topped up the NPPV IVC for our own staff to deal with the misconception that SC, which is a NSV vetting level and involves no examination of police non-conviction databases, is sufficient to access Secret and Top Secret 'Police' information and assets such as SCD 7/8 and DPS material.	DCS SO15	N/A
7.10	In setting the Key Performance indicators for the new amalgamated unit, the Unit Head:- <ul style="list-style-type: none"> Sets and agrees in liaison with Key Stakeholders performance targets for 	M	Y	Agreed.	Head of Vetting Unit	3 Months from the date of

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	<p>processing security clearances within a specified timescale.</p> <ul style="list-style-type: none"> Exception reports are issued to Management/Vetting Board on a regular basis highlighting any area where the target has not been met. Appropriate and prompt action is taken to address any area of under-performance. 		<p>Y</p> <p>Y</p>	<p>This will be included in the Vetting Strategy placed before Management Board.</p>	<p>DCS SO15 Head of Vetting Unit</p> <p>Head of Vetting Unit</p>	<p>amalgamation</p> <p>3 Months from the date of amalgamation</p> <p>Ongoing</p>
7.11	The central vetting unit review and revise the system in place for capturing information in respect of staff leavers and dismissals and for updating records.	M	Y	<p>Agreed</p> <p><u>March 2010</u> - Delayed due to non amalgamation.</p> <p><u>October 2010</u></p> <p>This is being covered in the scope of the amalgamation programme.</p>	Head of Vetting Unit	April 2009.
7.12.1	Back up tapes are held off site.	M	Y	<p>Agreed</p> <p><u>March 2010</u> - These are now held in Tower Block NSY.</p>	Head of Vetting Unit	April 2009.
7.12.2	Reports are produced from the	M	Y	Agreed	Head of Vetting Unit	Work in

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	systems to show any deletions, additions and changes to records and reports are reviewed by an independent person.			<u>March 2010</u> - This requires an amendment to the IT systems	Unit	progress..
7.13	Procedures for the storing and retention of files and for ensuring compliance with the Data Protection Act are established and are followed by both units.	M	Y	Agreed <u>March 2010</u> - Ongoing	Head of Vetting Unit	October 2009
8.1	When the units amalgamate, management report requirements are identified and timetables for completion are introduced. The management reports should then be regularly reviewed and follow up action taken as appropriate and recorded.	M	Y	Agreed	Head of Vetting Unit	3 Months from the date of amalgamation