



Service Improvement Review of Security Clearance Processes

Management Summary – Redacted Version

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MANAGEMENT SUMMARY

Introduction

The Security Clearance Process described in this report (also known as Vetting) is a series of checks carried out when a person applies to join the Metropolitan Police Service (MPS) as an employee or a contractor (or when an existing employee applies for a post within the MPS which has a higher level of vetting clearance).

The aim of carrying out the checks is to protect the MPS from persons and organisations, both internal and external, who may seek to harm it or make it vulnerable to harm through their own vulnerabilities. An ideal vetting service will balance timeliness, risk and cost.

This Service Improvement Review (SIR) was prompted by the concern that the time taken to complete security clearances was reducing local effectiveness, whilst units waited for new employees to join, and creating costs due to prospective employees taking up offers of alternative employment elsewhere. However, the research identified that current problems with the vetting service are much more complex than this.

Lack of communication and a failure to manage customers' expectation has led to the widely held perception that the vetting process takes too long. In many instances this is backed up by specific examples, in many it is not. The perception is fuelled by a lack of comprehensive monitoring information from both internal and external units involved in the process, which prevents an accurate picture being created.

Despite this lack of data the impact of the problem on the MPS is tangible: failure to fill vacancies has contributed to the £1.6 million underspend on police staff pay in TP, a contractor has pulled out 5 months into a cleaning contract, understaffed units are more likely to use overtime to make up the shortfall, the recruitment process has had to be repeated, wasting time and effort and presenting the MPS as unprofessional to potential employees. Units resort to taking staff on who are not cleared and managing the risk they pose by supervising them locally and limiting their access to systems and premises (and their usefulness to the organisation).

Vetting can be particularly lengthy for people who have lived outside the UK; this adds an extra dimension of frustration and can lead to reluctance from these individuals to apply to the MPS.

The disparate nature of the 2 key vetting units (Personnel Security Group (PSG) and Special Branch Vetting Unit (SB)) adds to this inefficiency. Separate lines of command mean different priorities, staffing, skills and IT systems (and in some cases a basic lack of trust in the quality of each others' checks). Both these units are at capacity in terms of accommodation for staff and equipment so there is little opportunity for expansion to deal with an anticipated increase in workload.

Despite all this, staff in the vetting units processed 21,000 cases in 2003/04 and provide by far the largest and most comprehensive police vetting service in the country at a total cost of around £2 million.

This document constitutes the final report of the Security Clearance Processes Service Improvement Review conducted by Internal Consultancy Group (ICG). The review was commissioned by the Metropolitan Police Authority (MPA) as part of its Best Value Review Programme.

Future Vision

This SIR presents the MPA and MPS with the following:

- The opportunity to adopt a more flexible approach to vetting where practical and a more rigorous approach where prudent;
- The opportunity to restructure the organisation of the MPS' vetting services in order to maximise the benefits of a more streamlined approach;
- The opportunity to ensure that equality for all is inbuilt to the vetting process.

In the short term 'quick wins' are possible, particularly to improve customer focus and communication. However, it is evident from this review that bolder changes are required in order to make significant improvements to the vetting process in the long term.

These improvements will only be realised if a more flexible approach is adopted to specific types of vetting (rather than 'one size fits all'); the delivery of vetting services is restructured through the merger of the functions of key units to create a single Vetting Unit; and the recruitment and vetting processes are more closely aligned and automated. All of this needs to be achieved whilst ensuring that the process is as fair and transparent as possible.

The vetting units alone cannot deliver all the improvements that are needed or possible. Successful implementation requires co-operation from the dozens of sponsors, both inside and outside the MPS, to ensure that customers' expectations are managed and process changes are capitalised on.

The biggest challenge for the MPS is the cultural change which is needed to successfully manage the amalgamation of vetting functions and the management of risk associated with a more flexible approach to vetting.

The picture at Figure A highlights the key elements of the review, which form the overall future vision of a security clearance process that is customer focused, timely, fair, secure, efficient and robust.

Applicant –The applicant sees the recruitment and vetting process as a streamlined, seamless process with one point of contact into the organisation. It is clear to them how long they will be expected to wait and what the vetting process involves. They are regularly updated on progress.

Sponsors – Sponsors within the organisation (and externally) will have a clear, single point of contact for the vetting process. They will be kept updated on progress and will effectively manage the applicant's expectations. They will keep accurate records of their part of the vetting process.

Checks from abroad– These will be carried out as quickly and effectively as possible, using a variety of sources to provide relevant information. The impact they have on the speed of the process will be better understood.

HR Recruitment– The recruitment process will link directly with the vetting process using improved IT.

Policy – The Vetting Policy Unit under the authority of the Vetting Board will ensure that coordinated policy is developed and established between the new Vetting Unit and internal and external units.

SLAs – New Service Level Agreements will be developed between the MPS Vetting Unit and partner agencies, specifically the Security Service, and between the Unit and internal units including Special Branch. This will ensure clear lines of accountability in relation to performance and service.

IT –IT will be developed and improved to ensure an effective link between HR (local and central units) and the Vetting Unit. This will be possible by interfacing MetHR with Warrantor. The use of Warrantor as the sole vetting database will also improve the data communication link to the Security Service by moving away from numerous data inputting onto different systems. The IT will also allow an easy and effective method for monitoring file progress (audit trail).

Training – all units involved in the vetting process, specifically staff in the new Vetting Unit and HR Recruitment, will be trained to a minimum standard.

Decision-making – The decision-making and appeals process will be consistent and therefore all types of applicant will be treated equally.

Governance – There will be clear lines of responsibility for delivering the MPS' vetting functions agreed between the Head of Vetting and the Head of National Security Vetting. The MPS **Vetting Board**, reporting to the Corporate Governance Steering Committee (CGSC,) will be active in ensuring that operational vetting issues are addressed, consistent vetting policy and standards are developed and implemented in accordance with best national practice, that proposed improvements to the process are identified and implemented and that the vetting process is governed by a fair policy.

Corporate Risk – Applying a more flexible approach to vetting where practical and a more rigorous approach where prudent will enable more effective management of the corporate risk associated with vetting.

External Partners - A coordinated, robust vetting process with a common set of policy and standards will help to ensure the MPS remains a trusted partner within the security and intelligence community. It will enable more effective partnership working with organisations such as the Security Service and the Defence Vetting Agency and help to ensure adherence to ACPO, Home Office and Cabinet Office policy.

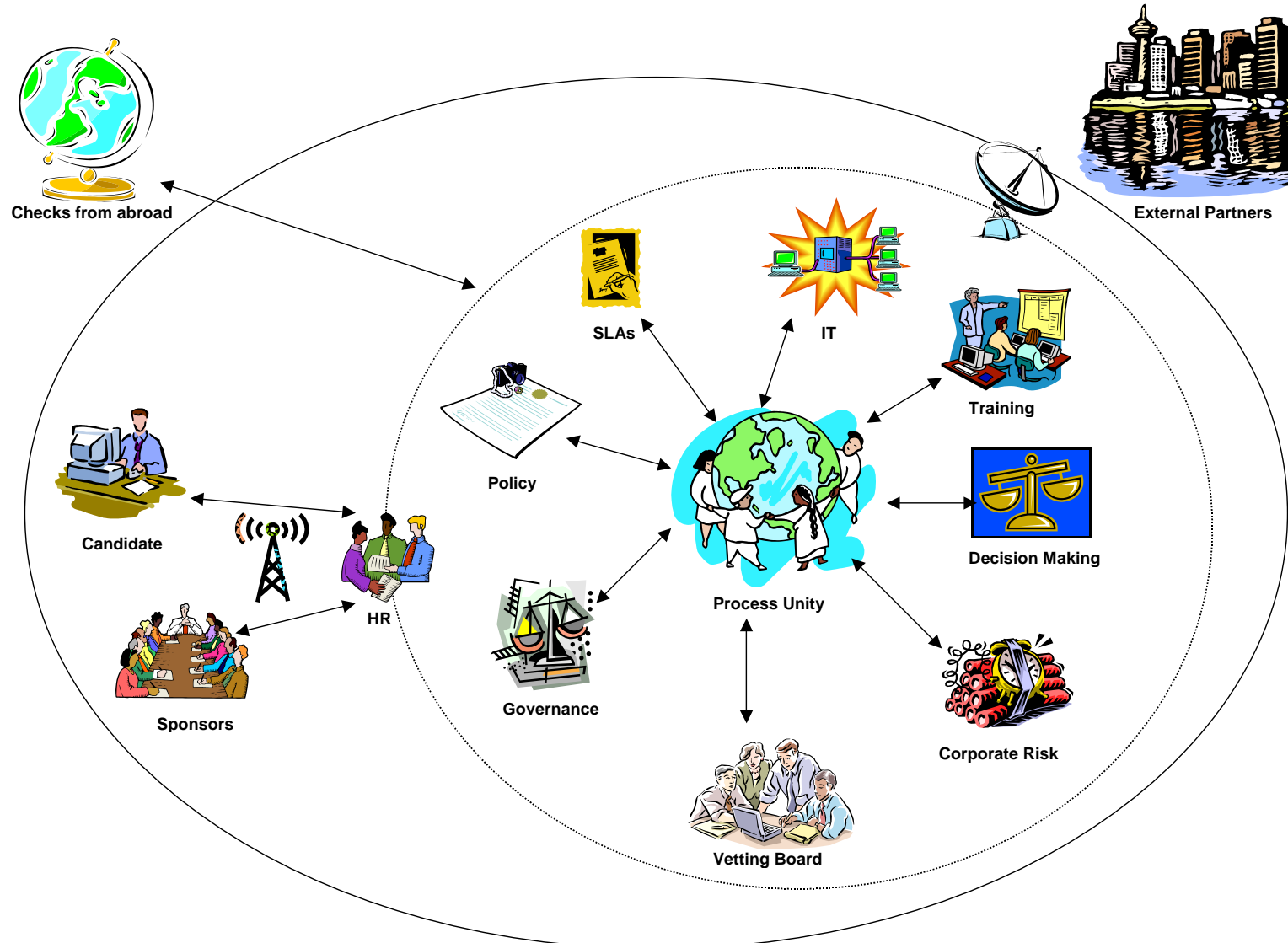


Figure A: MPS Security Clearance Processes – Future Vision

Summary of Costs and Benefits

Principal Costs

The principal costs of the recommendations resulting from this review are:

Capital investment

- Estimated Total: £98,000 made up of:
 - Scanning hardware - £20,000
 - Scanning software - £15,000
 - Warrantor costs - £33,000 based on an additional 15 terminals to meet the requirements of extra functions from SB vetting unit
 - Costs of designing and implementing combined online forms - estimate £30,000 (based on information from HR recruitment)

Revenue costs

- Additional staff costing between £103,000 and £301,000 per annum depending on:
 - the extent to which Special Branch checks are adopted
 - the size of the Implementation Team and the length of time it is required
 - the extent to which the MPS take on checks for employees of the Royal Household (estimates based on five band F Police Staff)
- Scanner maintenance £3,000 per annum
- The costs of searches in countries that may charge

Opportunity costs

- A potential deterioration in service whilst vetting functions are amalgamated.
- Identifying, and reviewing, the clearance levels appropriate for posts.
- A more flexible approach to vetting will require amendments to terms and conditions of employment and ongoing risk management costs associated with lower levels of clearance (including education, supervision and escort requirements).
- Managing applicants' expectations for longer when overseas checks are carried out.
- Data collection and analysis for more extensive performance monitoring.

- Setting up and maintaining a process for feeding back traces to Home Forces.
- Ongoing cost of ensuring the MPS is meeting the requirements of the SLA with the Security Service.

Principal Benefits

The principal benefits are:

- Estimated potential savings of up to £270,000 per annum, based on:
 - Estimated saving of up to £200,000 per annum on repeat recruitment (£3,000 recruitment cost per potential employee – based on preventing up to 10% of current Police Staff withdrawals)
 - Potential savings in reduction of paper applications (postage and printing) - £70,000 per annum
- Faster vetting process leading to fewer good candidates lost through clearance delays and fewer unfilled vacancies reducing the reliance on overtime and temporary staff, leading to improved MPS service delivery. Also reduced opportunity costs of managing candidates through lengthy vetting processes
- Improvements in policy and standards including closer compliance with ACPO, Cabinet Office and Home Office policies
- Increased robustness of MPS vetting checks, record keeping and sharing of traces with other Forces leading to a reduced likelihood of incidents in the MPS or other Forces as a result of failures to make use of police information
- More accurate audit trails and better case progression
- Checks carried out will be appropriate to the requirements of posts, reducing the workload for the vetting units
- Opportunities to identify areas for improvement within the process.
- Enabling a fairer, more transparent process to be developed, reducing the potential for appeals, tribunals or legal challenge to the MPS, widening the potential pool of applicants for MPS employment and reducing any potentially disproportionate impacts on VEM applicants.

A diagram illustrating how the recommendations are expected to lead to key benefits for the MPS follows the management summary.

Implementation Arrangements

The Improvement Plan in the final report (also attached to this report) includes proposed dates for implementing the recommendations. An overview of the timescales for implementing the different recommendations follows at the end of this management summary.

The MPS Vetting Board has been created to be responsible for implementation. It is chaired by Commander DPS and includes representatives from all the MPS Business Groups. The MPS Vetting Board will report to the MPS Corporate Governance Steering Committee (CGSC) and through this to the MPA Planning, Performance and Review Committee (PPRC). Issues related to the Royal Household will be addressed by the Royal and VIP Executive Committee of the Home Office (RAVEC).

The Review recommends that a cross- Business Group Implementation Team is formed to ensure that the short term recommendations of this review are progressed and that a more detailed, resourced implementation plan is agreed, developed and monitored. The Implementation Team will report to the MPS Vetting Board.

Methodology of the Review

The Security Clearance Service Improvement Review followed the approach taken by the last two reviews in placing a greater emphasis on delivering outcomes and improvement. The approach has adopted a more proportionate and flexible application of 4C (Consult, Compare, Challenge and Compete) principles.

The work of the review team was guided by a Project Board comprised of representatives of many of the key stakeholders in the vetting process. An Independent Challenge Panel (ICP) was established to provide a robust challenge and inject new ideas into the review process.

Consultation was undertaken with the vetting providers (including PSG, SB and the Security Service), customers of the vetting process (recruiting units, contractors and staff) and other stakeholders. A range of internal representative bodies was contacted by letter for their views. Many groups were also represented on the Project Board and the ICP.

Extensive process mapping of the key vetting processes was carried out. This enabled comparison with other Forces and organisations (despite a lack of detailed performance data) and the impact of changes on the system to be considered.

The consultation identified issues with the current process and potential improvements.

Comparison was made with three Forces considered to be at the forefront of Police vetting policy: Kent, Sussex and Greater Manchester. The Security Service, the Defence Vetting Agency (DVA) and Merrill Lynch Europe plc also assisted the review providing both comparison and ideas for competition with alternative forms of service delivery. The ICP also encouraged the Review Team to consider radical solutions throughout the project.

Diversity was considered throughout the review. The potential of the current policy and vetting process to discriminate was identified early on in the Review. In common with other MPS units, PSG is currently assessing its vetting policy to ensure that it complies with the Race Relations (Amendment)

Act 2000. Specific proposals have been made throughout the Review to address this issue and also to ensure that the process for consultation with affected groups and for carrying out an Equalities Impact Assessment is built into future policy development.

Vetting, and PSG in particular, has been the subject of previous reviews: by MPA Internal Audit during 2000/01 and the MPS' Inspectorate in March 2003. This review has taken into account progress made in implementing the recommendations from this previous work.

Vetting Processes were a key theme to emerge from the MPS' consideration of the findings of the Bichard Enquiry. The recommendations made in this report about the future of vetting in the MPS will form part of the MPS' response to the Enquiry.

Other recent reviews which may affect vetting are the Thematic report on Race and Diversity by AC Ghaffur and the Commission for Racial Equality's (CRE) formal investigation of the police service in England and Wales.

Scope of the Review

This original problem to be addressed by this review was:-

Problem 1- 'Reduced local effectiveness and loss of potential staff'.

Issues were identified from the research and consultation which illustrated this problem. These are issues which impact the type of people employed, the cost to the unit awaiting staff, the speed of the process, the workload of the vetting units (and hence the speed of the process) and communication between units.

The Review Team identified that the largest impact on this problem could be made by considering the IVC, CTC and MV vetting levels (see below for definitions) and it is in these areas that the more detailed research has been concentrated. Security Check (SC) and Developed Vetting (DV) levels were not researched to the same level of detail at this stage and no changes are proposed at present to these functions.

The research and consultation also identified issues related to two other problems described as:

Problem 2 - 'Risk of recruiting inappropriate staff'

Problem 3 - 'Risk of having inappropriate staff: a) In the organisation; b) In a specific job'.

These problems are inevitably linked to the original problem and some of the issues identified overlapped. A table of all the issues raised and the corresponding options for improvement that were suggested is incorporated as Appendix F to the full report.

The Project Board agreed that issues related to Problem 1 would be given priority and more detailed research would be carried out. The result of that research was a range of proposed 'quick win' changes and options for further work. The Project Board remitted many of the options to the new MPS Vetting Board for action. The Review Team were asked to investigate certain options further and the final report contains the resulting recommendations, which are also reproduced in this summary.

The consideration of Problems 2 and 3 will be the subject of further work commissioned from ICG.

Overview of the Service Under Review

The MPS is committed to the maintenance of the highest levels of honesty and integrity, and to the prevention and disruption of dishonest, unethical and unprofessional behaviour. The primary function of the vetting process described in this report is to maintain and enhance the integrity of the MPS.

It is important that the correct balance is struck between the need for new staff to be cleared to join the organisation as quickly and efficiently as possible and the need to ensure they will not put the organisation at risk. The process requires input from units both inside and outside the MPS so some aspects are outside the MPS' control.

There are currently several units in the MPS who are involved in carrying out vetting of one type or another:

- Personnel Security Group (PSG) within the Directorate of Professional Standards (DCC8)
- Special Branch (SB) Vetting Unit within Specialist Operations Department (SO12)
- Character Enquiry Centre within Specialist Operations Department (SO4)
- Vetting Unit within Specialist Operations Department (SO4)
- Royalty Protection Unit, within Specialist Operations Department (SO14).

The table at Figure B highlights the key characteristics of the units.

The significant difference in the type of vetting carried out by these units is that only PSG and SB carry out vetting for prospective MPS employees. These two units are the focus of this review.

There are currently two types of vetting procedure in operation within the police community, National Security Vetting and Force Vetting. National Security Vetting and Force Vetting are separate procedures, designed to counter specific threats.

The purpose of National Security Vetting is to protect sensitive government national security assets, by providing an acceptable level of assurance as to the integrity of individuals who have access to protectively marked government assets or who require access to persons, sites and materials, at risk of terrorist attack. The following levels of National Security Vetting exist:

Counter-Terrorist Check (CTC)

CTC clearance became compulsory for all new MPS employees from 1994. CTC is required for any individual who requires unescorted access to 'designated' MPS premises, or access to sensitive MPS information, which may be useful to a terrorist organisation. SB Vetting Unit are responsible for CTCs for potential and current MPS employees, PSG are responsible for CTCs for non-MPS personnel.

Security Check (SC)

SC clearance is required for those individuals who are to be employed in posts, which involve long-term frequent and uncontrolled access to SECRET assets, and require occasional, supervised access to TOP SECRET assets and information. SB Vetting Unit are responsible for SCs for potential and current MPS employees, PSG are responsible for SCs for non-MPS personnel.

Developed Vetting (DV)

DV is required for those individuals who have long-term frequent and uncontrolled access to TOP SECRET information. It is also intended for individuals who while not in such posts, will be in a position to directly or indirectly bring about the same degree of damage or who need access to certain levels of protectively marked material originating from another country or international organisation. The Special Branch Vetting Unit performs this process in conjunction with the Defence Vetting Agency.

The purpose of Force Vetting is to provide a similar level of assurance as to the integrity, honesty, vulnerabilities and ethical standards of individuals who have access to sensitive criminal intelligence, financial or operational police assets. The MPS has the following Force Vetting levels:

Initial Vetting Clearance (IVC)

IVC is a level of clearance that is unique to the MPS. An IVC includes a basic check on the applicant's identity, nationality, and references as standard and checks on a number of police databases. This level of clearance allows access to restricted, confidential, and the occasional supervised access to secret information.

Management Vetting (MV)

MV is required for those individuals who will be required to undertake posts within designated sensitive areas. The MV process is a detailed, thorough examination of the applicant's work history, lifestyle, social activity and finances and is performed by the PSG.

The type of vetting and the unit carrying it out varies, depending on the role applied for and clearance level required. In general PSG carry out Force Vetting and SB National Security Vetting (although PSG carry out all vetting for contractors).

Vetting Unit	DCC8 Personnel Security Group	SO12 Special Branch Vetting Unit	SO4 Character Enquiry Centre	SO4 Vetting Unit	SO14 Royalty Protection Unit
Workforce	38	8.5	114	20	3
Police Officers employed	0.25 DCS* 0.35 DSupt* 1 DCI	0.1 DCS * 1 DS 3 DC	1 Supt 1 DCI 1 DI 3 DS		
Police Staff employed	2 Band C 7 Band D 28 Band E	4.5 Band E	1 Band C 13 Band D 92 Band E 2 Band F	1 Band E 12 Band F 7 Band G	3 Band F
Approx. Workload (Cases 2003/04)	20,000	12,000 (1,000 'new' cases and 11,000 counted in PSG figures)	520,000	44,200	17,000
Location	New Scotland Yard	New Scotland Yard	New Scotland Yard	New Scotland Yard	Buckingham Palace and Windsor Castle
Processes	IVC, MV For potential employees of the MPS IVC, MV, CTC, SC For Non MPS Personnel	CTC, SC, DV For current and potential employees of the MPS	Records Management, CRIS (Crime) and CRIMINT (intelligence) checks **	PNC checks for potential employees of Government departments	PNC checks for potential employees of the Royal Household
Annual Costs	£1,492,000	£513,000	£4,376,000	£405,000	£71,000
Annual External Income	Nil	Nil	£4,376,000 ***	£405,000 from Capital City allocation	Nil
Net Annual MPS Cost	£1,492,000	£513,000	Nil	Nil	£71,000

Figure B: Comparison of MPS Vetting Units

** Senior officers advised that they spend a fraction of their time on vetting matters.*

*** For people seeking access to children or vulnerable adults via employment, voluntary work, fostering or adoption who have lived within the MP Area during the past 5 years*

**** SO4 Character Enquiries Centre is funded by the Criminal Records Bureau, which pays a fee per check carried out by the MPS. These disclosure fees are reviewed every six months to ensure that the MPS is able to recover its costs.*

On 1st June 2004 a new MPS Vetting policy was published which defines the purpose of vetting within the MPS and sets guidelines to ensure a consistent approach in line with ACPO vetting policy for the police community.

Cases (applications) arrive in the vetting system from a sponsoring unit, which can be internal or external to the MPS. They include the MPS' central recruitment unit for police officers, contractors' representatives for significant IT and cleaning contracts and local HR managers for specific Boroughs or headquarters units. There are currently 85 different sponsoring units recorded on the PSG system, each of these needs to be treated as a separate customer.

The following chart shows a breakdown of the 20,001 cases handled by PSG during 2003-04.

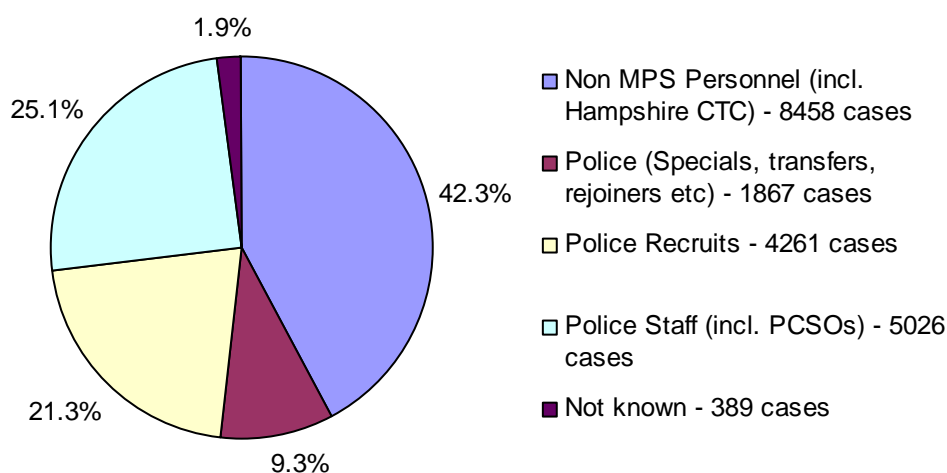


Figure D: Chart showing the breakdown of PSG vetting cases in the 2003-4 financial year

The minimum clearance level for MPS employees is currently Initial Vetting Clearance (IVC) plus a Counter Terrorism Check (CTC). This clearance took on average 47 calendar days in September 2004 but anecdotal evidence suggests that some cases may take significantly longer. This average timescale is longer than the average of 33 days advised by Greater Manchester Police or the 28-day average advised by Police Service of Northern Ireland.

All forces consulted advised that National Security Vetting has taken longer since 11 September 2001. Data from Special Branch suggests that almost 11% of MPS CTC cases may take longer than 4 months.

Meaningful comparison of the average turnaround times for other clearance levels was not possible due to either a lack of data or differences between the checks carried out by the MPS and other forces.

PSG set a target of completing 80% of CTC clearances (including IVC) in 35 days. Performance since April 2004 has not met this target, varying between 56% and 63%. In comparison the Defence Vetting Agency (DVA) sets a

different target of completing 62% of CTCs in 30 days and almost achieves this (currently 61%). The DVA is currently exceeding its targets for completing higher levels of National Security clearance (Security Checks and Developed Vetting).

PSG are not regularly meeting their performance target of completing 80% of Management Vetting cases within 42 calendar days. In the last 5 months only 54% of cases met this target. This figure does not compare favourably with Sussex Police who complete all their force vetting within 30 days. Sussex's performance target is to have 90% of all clearances completed in 30 days.

Recommendations

The team make the following recommendations to improve MPS security clearance processes:

Merging Vetting Units

Responsibility for the process of vetting is currently divided between five units within the MPS.

Two units provide checks for all potential employees applying to the MPS and they have been the main subjects of this review. They are the PSG situated within the DPS (Directorate of Professional Standards) part of the Deputy Commissioner's Command and the SB Vetting unit in the Specialist Operations Department.

The other three units (the Character Enquiry Centre and the Vetting Unit within the National Identification Service, and the Royalty Protection Unit – all of whom are also part of the Specialist Operations Department) provide various vetting services for other external customers.

Responsibility therefore, is divided between units in different locations, dealing with a range of different customers, but carrying out some of the same checks of MPS systems. The units have different staffing levels, with a range of experience and expertise, under different line management, and operate according to different policies and standards and Business Group priorities.

The vetting process for potential employees varies depending on the type of vetting required, i.e. National Security Vetting which is managed by the SB vetting unit and MPS Force Vetting, managed by PSG.

Within the two units there are a number of specific checks which are performed by both units, including PNC checks and credit reference checks. This duplication of effort is due to a lack of confidence in the other unit. The application forms are also quality assured twice, once by each unit and at either stage an inaccurate form can lead to it being returned to the applicant, meaning potentially one applicant can have the same form returned more than once.

The two units also have 5 different IT systems between them for recording and inputting information: Warrantor, PARASOL, Filemaker Pro, V2 and Unity database. Warrantor is a comprehensive vetting system, while the others are means of inputting data. This means that for a new applicant, both could hold different information regarding the same person.

There are at least 85 Sponsors from both within and outside the MPS who can submit an applicant's application into the vetting process. During the process most of these applicants are dealt with by both PSG and SB Vetting Unit, causing frequently blurred lines of accountability for managing customers' expectations, dealing with queries and providing updates.

From a customer's perspective, the level of vetting they are subject to is irrelevant. As far as a potential employee is concerned, the vetting process should be quick, efficient and transparent. The approach and processes taken by the current units do not allow for this and one impact is that potential employees are withdrawing from the system. Additionally, applicants and sponsors are frequently unable to contact the relevant unit in order to track progress of cases.

The review also highlighted a number of inefficiencies in the process which could be addressed in the long term by moving to an automated, electronic system for security clearance.

From the applicant first applying for a position, whether they are a new applicant or existing MPS employee, through to the granting of the relevant level of security clearance, it is clear that automated processes would be quicker and more accurate.

Following the Report of the Bichard Enquiry, the MPS needs to ensure that the information it holds is used appropriately and shared effectively with other Forces. Progress towards this could be made merging the MPS' current vetting functions and rationalising the current plethora of IT systems.

ACPO policy states that the functions of internal Force Vetting should sit within DPS, it also suggests that the Head of National Security Vetting should sit within Special Branch. It is therefore the recommendation of the Review team that the new MPS Vetting Unit remains within DPS and the Head of National Security Vetting remain within Special Branch.

As stated earlier in this report, the Review Team identified that the largest impact on the problems outlined could be made by considering the IVC, CTC and MV vetting levels. For this reason it is proposed that any amalgamation of functions starts with the CTC vetting function.

Recommendation 1: The MPS's aim should be the creation of a single MPS Vetting Unit and that this unit should sit within DPS, combining the functions of all current vetting units under one head, working to a common policy and set of standards, supported by a robust, integrated IT infrastructure.

This should be achieved by:

- 1.1 Combining the Counter Terrorism Check (CTC) administrative functions of Personnel Security Group (PSG) and Special Branch (SB) Vetting Unit**
- 1.2 Ensuring that those checked by SO14 are done so to MPS standards**
- 1.3 Developing the current IT systems to prepare for the future**
- 1.4 Identifying whether it is appropriate to incorporate the functions of SO4 vetting units into the MPS Vetting Unit**
- 1.5 Considering the potential for combining the Security Check (SC) vetting functions of PSG and SB Vetting Unit and whether this should be incorporated into the MPS Vetting Unit**
- 1.6 Considering the potential for incorporating the Developed Vetting (DV) function of SB Vetting Unit into the MPS Vetting Unit**

The impact of this recommendation on the MPS should not be underestimated, its implementation must be planned and managed as a significant programme of change.

The review team proposes the following staged process for moving from the current situation to a new unified MPS Vetting Unit, which is capable in the long term of providing an electronic on-line vetting process.

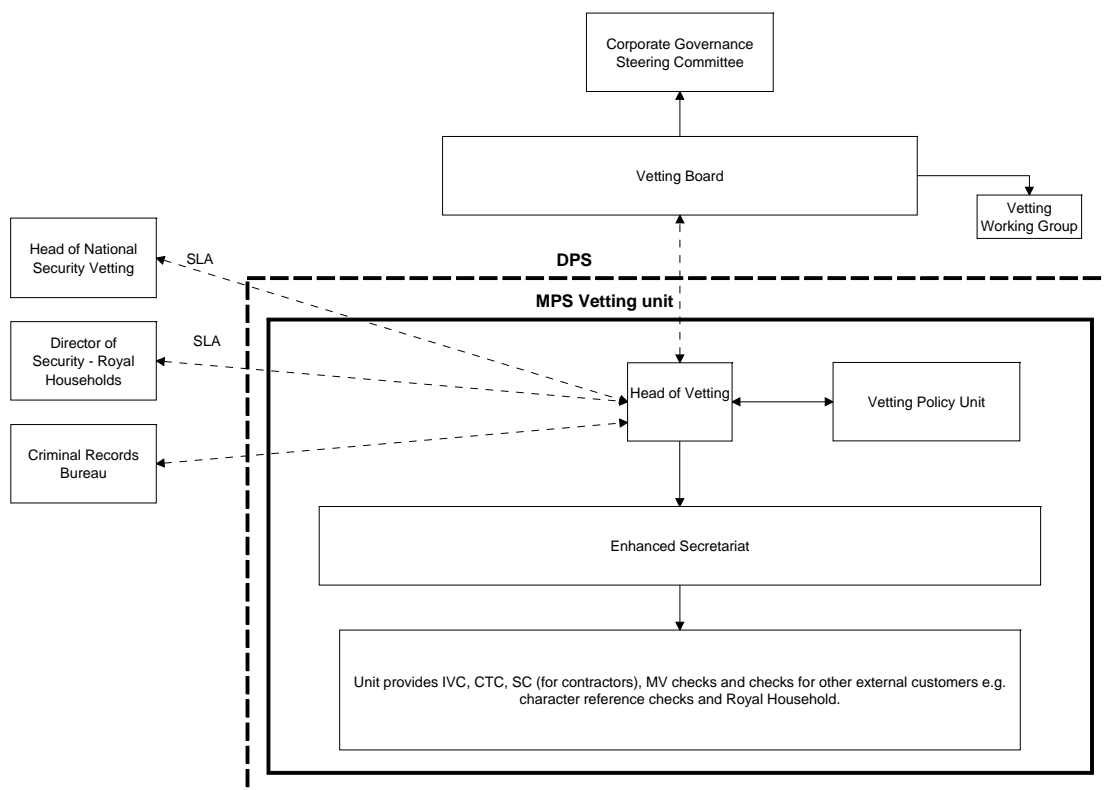
Timescales Key:

Short term:	By end of June 2005
Medium term:	By end of March 2006
Long term:	After March 2006

	Short term	Medium term	Long term
1.1	Combine the CTC admin functions of SB Vetting Unit and PSG		
1.2	SO14 represented on MPS Vetting Board	Transfer checks to the MPS Vetting Unit	
1.3			Develop Warrantor link to Security Service and combine recruitment and security application

			forms online
1.4	SO4 represented on MPS Vetting Board	Consider potential for transferring staff released from SO4 Vetting Unit into the MPS Vetting Unit	
1.5			Revisit to identify whether it is appropriate to give this issue further consideration.
1.6			Revisit to identify whether it is appropriate to give this issue further consideration.

Below is a proposed overview of the MPS Vetting Unit by end of March 2006:



Key Costs & Benefits

Costs (estimated)	Benefits / Savings (estimated)
A potential deterioration in service whilst vetting functions are amalgamated.	Estimated saving of up to £200,000 per annum on repeat recruitment (£3,000 recruitment cost per potential employee – based on preventing up to 10% of current Police Staff withdrawals)
Scanning hardware - £20,000 Scanning software - £15,000	
Scanner maintenance - £3,000 per annum	Reduction in maintenance costs of PARASOL - £4,000 per annum
Warrantor costs - £22,000 based on an additional 10 terminals to meet the requirements of extra functions from SB vetting unit	Faster vetting process leading to fewer good candidates lost through clearance delays and fewer unfilled vacancies reducing the reliance on overtime and temporary staff, leading to improved MPS service delivery.
Designing & implementation of online forms £30,000 (based on HR recruitment estimates)	Potential savings in reduction of paper applications (postage & printing) - £70,000 per annum
	Provision of a customer focused service
	More accurate audit trails and better case progression
	Improvements in policy and standards including closer compliance with ACPO, Cabinet Office and Home Office policies
	Increased robustness of MPS vetting checks, record keeping and sharing of traces with other Forces leading to a reduced likelihood of incidents in the MPS or other Forces as a result of failures to make use of police information

The costs & benefits are estimated potential figures based on data provided during the review.

Flexibility Of Pre-Employment Vetting - Counter-Terrorism Checks

Current MPS policy dictates that as a minimum all MPS employees are vetted to Counter Terrorist Check (CTC) level. The Cabinet Office Manual Of Protective Security states that CTC clearance is required for individuals who are to be employed in posts which:

- a. Involve proximity to public figures who are assessed to be at particular risk from terrorist attack,

- b. Give access to information or material assessed to be of value to terrorists, or
- c. Involve unescorted access to certain military, civil, industrial and commercial establishments assessed to be at risk from terrorist attack.

ACPO policy recommends that Police Staff should only be subject to a CTC if their posts meet the Cabinet Office criteria. Greater Manchester, Sussex and Kent Police follow this policy. MPS policy has not been reviewed since 1996.

Anecdotal evidence from across the MPS suggests that the time taken to grant CTC is too long. The perceived impacts are that applicants do not wait to start work with the MPS, perhaps taking alternative employment. This means that the MPS may have unfilled vacancies and additional recruitment costs. Impacts reported include:

- A police staff budget under-spend of over £1m last year in Territorial Policing (TP) Business Group, partly due to the inability to get people into post because of vetting delays.
- Contractors build 3-4 month lead times into agreements to supply services to the MPS to allow time for personnel to be vetted. Corporate Facilities Management reported that one cleaning company even pulled out of their contract with the MPS this year when, after 5 months, the MPS had been unable to vet sufficient numbers of their staff.
- Local units employing staff before they have CTC clearance.
- Vetting delays may reduce the MPS's ability to meet diversity targets.

A survey of local HR managers revealed that, from the units replying, an average of 13% of Police Staff applicants withdrew from recruitment processes after being offered posts over the 18 months to September 2004. Almost a third of TP's job offers to prospective Police Staff resulted in withdrawals. The reason for withdrawal could include reasons other than waiting too long for security clearance.

The current average turnaround time for CTCs with PSG is 48 calendar days, however in cases where only IVC is required the average time is just 19 calendar days. Special Branch carried out almost 5,000 CTCs for Police Staff in 2003.

Relaxing the current CTC requirement for Police Staff offers the potential to employ staff significantly faster (by one month on average and by almost a year in extreme cases) and to reduce the workload of vetting units. This would require the MPS to accept and manage increased risk.

Size of the risk

Figures provided by Special Branch Vetting Unit show that just 5 MPS applicants out of 26,022 were refused CTC clearances (excluding refusals because applicants did not meet minimum residency requirements) between January 2001 and September 2004 (0.02%).

Risk Management

The MPS already has certain measures in place to manage the risks of access to information including instances where individuals working in close proximity have different levels of clearance.

A system of passes is in operation to allow access to MPS buildings. Escorts would need to be provided for staff without CTC clearance when visiting designated buildings.

An IVC can allow individuals access to much of the information contained on the MPS AWARE network. A special log on category can be set up for staff without CTC clearance to restrict access to sites that would be of interest to terrorists, such as the Operation Rainbow site.

According to the Manual Of Protective Security, in most cases, an IVC is sufficient to allow an individual occasional access to SECRET material in the normal course of business; entry to areas where SECRET assets are stored; and to work in areas where SECRET or TOP SECRET information might be overheard, provided that the information does not relate to terrorism.

Fewer CTCs Option

The MPS could remove the requirement for CTC clearance for certain Police Staff posts, setting their clearance requirement as IVC only. The roles likely to benefit from this policy are those that will require little or no access to buildings, IT and information of interest to terrorists and for which such access can be effectively managed. The review team recommends:

Recommendation 2: The MPS Vetting Board should revise Policy and Standard Operating Procedures, by June 2005, so that personnel will not require National Security Vetting clearance if this cannot be justified, taking into account Cabinet Office, Home Office and ACPO policy.

Interim Clearances Option

The MPS could allow applicants for certain posts to start employment after IVC but pending CTC clearance. This would be dependent on the role and the risk management would need to be assessed. Employment would have to remain conditional on passing the CTC with employment terminated if the vetting units recommend against granting clearance. MPS employment contracts would need to be altered to reflect this.

To get applicants into post quicker when they require CTC clearance but their access to MPS assets can be effectively and economically managed until this clearance is obtained, the review team recommends:

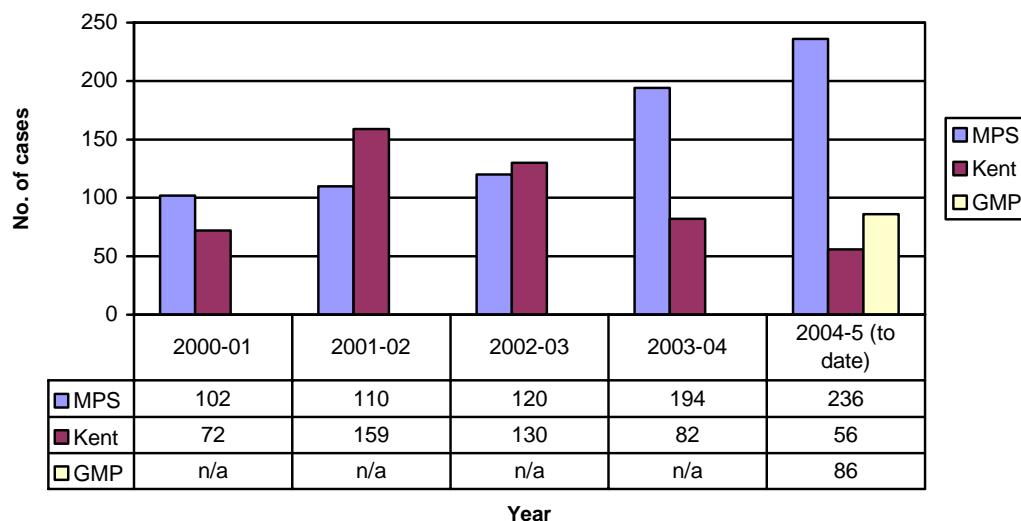
Recommendation 3: A pilot process to test the viability of granting interim clearances should be developed by June 2005.

Flexibility Of Pre-Employment Vetting - Management Vetting

MV was borne out of the 1998 HMIC inspection to assess the levels of integrity in the Police Service. Their report, 'Police Integrity', made a number of recommendations to improve professional standards in forces. It was recommended that an enhanced vetting process should be introduced to consider lifestyle and financial vulnerabilities.

The first MV case within the MPS was processed in 1999. Since that time the number of MV cases processed per annum has increased dramatically. The signs are that this trend is likely to continue as MV becomes more and more popular within the MPS (particularly with specialist units). It is the unit of highest growth within PSG. Further, although it processes only 1% of the PSG workload, it encompasses approximately 25% of PSG resources.

MV Cases per year



The objective of MV is to protect the interests of the MPS, and the individuals who represent the Service, by ensuring that 'designated posts'¹ are not filled by people about whom there are justifiable concerns that they may practice, or be vulnerable to corruption, dishonesty or unethical behaviour.

MV is not a level of clearance in the National Security Vetting system, it falls into the Force Vetting category. The MV undertaken within the MPS is unique to the MPS. It is specifically designed to be a detailed, thorough examination of the applicant's work history, lifestyle, social activity and finances.

The SIR team believe MV to be an extremely robust process and this adds to the integrity of the 'designated' posts within the Service. However, currently the MVU are not regularly meeting their performance target of completing

¹ A 'designated post' is defined as one where the opportunities for corruption are highest and there could be a substantial risk of serious damage to the Service if it were occupied by a person who is corrupt, dishonest, unethical or vulnerable –MPA Professional Standards and Complaints Committee – Nov 2003

80% of MV cases within the target of 42 calendar days. In the last five months only 54% of cases met this target.

762 cases have been dealt with since MV inception in 1999. There have been 15 refusals, this is less than 2%. The majority of refusals are for financial concerns or criminal associations.

It was found throughout the consultation that one of the reasons cited for the lack of timeliness within the MV process has been the rigorous adherence to compulsory interviewing of both the applicant and line manager. This is in contrast to all other forces we spoke with who only interview if anomalies in the vetting research arise. It also goes against ACPO Policy on MV which notes *“as a general rule, interviews should only be conducted to clarify queries, ambiguities or concerns raised during the vetting process”*.

Indeed, current MPS practice goes beyond all documented regulations for MV including ACPO Policy, Kent's Best Practice Guidelines, other force comparisons (i.e. Sussex and GMP) and the MPS Inspectorate report in March 2003.

A current pilot run in collaboration with SCD units has produced a system that identifies MV posts within each individual unit. This has worked well on a number of levels. It allows the SCD unit to have an understanding of what is required to identify a 'designated' post. It further means that every post in these units is not automatically designated as an MV post and sent to the MVU for processing, saving time and reducing unnecessary workload.

Another key reason for the unit failing to achieve its performance targets is that the MV Unit is currently under-staffed compared to its intended staffing level on inception in 1999. Originally it was intended that the MVU would operate with 12 staff (currently there are 9).

Meanwhile, the MPS Inspectorate recommended (March 2003) that two officers (a SVO and a VO) be present at each interview. This has yet to be fully implemented, mainly due to a lack of staff resources within the MVU. Following the SIR team's recommendation (4.4) to increase the number of staff in the MVU, the SIR team would further endorse the MPS Inspectorate's recommendation to have two staff present at each interview.

To enhance the unit's customer focus and goal to work more transparently, the SIR team would recommend that each MV applicant be given an individual case worker to contact for information regarding their case. Also that each applicant is given the opportunity to feedback their experience of the process formally to the unit. Currently the MV Unit do not have an answer phone capability. This would also make the process ultimately more transparent to the individual being vetted and increase customer focus. There is also a real need to ensure the interviewers are skilled enough to meet the demands of an experienced employee applying for an MV post.

In summary, the Review Team proposes the implementation of a more flexible approach to MV, which changes the 'one size fits all' and leads to a proactive, collaborative approach to Management Vetting.

Therefore the review team makes the following recommendations:

Recommendation 4: Changes are made, by March 2006, to the way the current Management Vetting process is carried out.

Recommendation 4.1: Mandatory interviewing of all MV applicants is discontinued. Senior Vetting Officers should exercise discretion whether an interview is necessary on an exception basis. As a general rule ACPO criteria should be used and interviews should only be conducted to clarify queries, ambiguities or concerns raised during the vetting process.

Recommendation 4.2: The MV Unit should produce a clear, effective feedback process for MV, so that candidates can give feedback on their experience of the process.

Recommendation 4.3: The designation of a post as MV is done through close collaboration between PSG and the Head of the Unit responsible for the post. The recent pilot with SCD units to be used as good practice.

Recommendation 4.4: Staffing levels within the MVU are increased to the original BWT of 12. Grades of staff to be appointed are to be reviewed.

Recommendation 4.5: Implement the MPS Inspectorate recommendation (March 2003) of having 2 staff present at each MV interview.

Recommendation 4.6: Each MV applicant to be allocated a specific caseworker, who will provide a single point of contact for the applicant during the process. The MV Unit to provide a dedicated answer phone for out of hours response.

Recommendation 4.7: Each member of the MV Unit to be provided with appropriate interviewing training before conducting MV interviews.

Checking Other Systems

The MPS does not check potential employees against Special Branch intelligence databases. This contradicts both Home Office guidance (which recommends these checks for Police recruits and their close relatives) and ACPO National Vetting Policy (the spirit of which also recommends the checks for Police Staff and Non Police Personnel).

Special Branch databases at different Police Forces are not currently linked. Consequently if potential employees or their families have lived outside their policing areas then these forces will contact their counterparts for local Special Branch checks in those regions. The MPS is unusual in refusing to carry out these checks for the purpose of other forces' vetting.

The MPS needs to decide:

- if the MPS Special Branch databases should be checked for MPS vetting applicants and their families;
- if the MPS should request checks from other forces' Special Branches when vetting applicants and their families have lived outside the MPS area; and
- whether the MPS should offer to check its Special Branch databases for other forces' vetting applicants and their families.

Following the Bichard Enquiry, the MPS needs to ensure that the information it holds is used properly and shared effectively with other Police forces. The review team recommends:

Recommendation 5: The MPS Vetting Board to determine, by March 2006, the extent to which Special Branch database checks should be carried out.

Recommendation 5.1: Checks against MPS Special Branch databases should be reintroduced for prospective MPS Police Officers (but not their partners, spouses or close relatives) from April 2005.

Recommendation 5.2: Special Branch should, by October 2005, provide the MPS Vetting Board with an assessment of the extent to which Special Branch systems checks could benefit the robustness of vetting.

Recommendation 5.3: The MPS Vetting Board should, by November 2005, decide on the extent to which the MPS should check both MPS and other Police Forces' Special Branch databases for prospective Police Staff and Non Police Personnel, and for applicants' partners, spouses or close relatives.

Applicants That Do Not Meet Current Residency Criteria

Current MPS policy (which is based on ACPO policy) states that all applicants must have resided in the UK for the last three years before they are eligible to be considered for employment by the MPS. This is to enable appropriate checks into their background, in particular criminal convictions and national security checks, to be carried out based on UK records rather than relying on those from overseas.

Between April 04 and September 04, PSG has refused clearances to 42 applicants on the grounds that they did not meet the residency criteria (approximately 10% of all those refused clearance).

Current opinion is that the number of applicants with backgrounds outside the UK is likely to increase with the widening of the EU boundaries and the increasing numbers of people who travel and work abroad for extended periods of time.

The concern for the MPS is whether the current policy is too stringent and will affect its aim of achieving a diverse workforce by being unable to employ otherwise able staff because sufficient information about their backgrounds outside the UK is not available. This must be balanced with the potential risk to the MPS, and hence the people of London, of employing people whose backgrounds cannot be satisfactorily checked out.

ACPO suggests that the application of this policy is not unfair as it could affect recruits of any nationality, if they have spent time abroad. Cabinet Office suggests that additional steps should be taken to gain information and assurance about an individual's time abroad, rather than rigorously applying the residency criteria. Although they recognise that, where fair and reasonable steps such as these have been taken, but it still has not been possible to gather enough information about an individual to be sufficiently reassured to grant them a security clearance, it does not have to be granted – no individual has the right to security clearance per se.

Other Forces approach NCIS for Interpol checks to provide more information, but the value and length of time these checks take cannot be guaranteed.

PSG is currently developing alternative ways of gathering information about an applicant's background. However, this has currently been in a limited number of circumstances and would not be considered to apply to particular 'target groups' in terms of the MPS' aim of achieving a more diverse workforce. The issue clearly is not solely within the control of the MPS.

It is proposed that PSG continues to develop alternative sources of information and that they prepare a proposal, for discussion with key stakeholders outside the MPS, about how more flexible application of the residency criteria may be implemented.

Recommendation 6: That further work is done by PSG, by July 2005, to prepare a MPS proposal about more flexible application of residency criteria, for discussion with key external stakeholders such as Cabinet Office, Home Office, ACPO and the Security Service.

Carrying Out Checks Outside the UK

The MPS (either PSG or SB) carry out initial vetting checks for any applicant requiring a level of National Security Vetting (CTC, SC or DV), prior to their security form being passed on to the Security Service for the National Security Vetting checks to be carried out.

The types of checks carried out varies but can involve checks in a number of countries for applicants who have a background or family history outside the UK.

This delay has been highlighted during the review as one of the factors which causes selected applicants to give up and leave the system and may be affecting applicants with backgrounds outside the UK disproportionately.

In order to identify if anything can be done to speed up the checks done outside the UK, it is necessary first to establish that this is the major cause of unnecessary delays in the overall vetting process, this includes the aspect governed by the Security Service and its procedures.

Once this is more clearly established, effective solutions to the delays should be investigated as part of the new performance monitoring system recommended by this review.

Recommendation 7: That the MPS agrees a Service Level Agreement (SLA) with the Security Service, by June 2005, for its input to the vetting process.

Checks On Names Of Overseas Origin

A computer system is used to transmit information on applicants to the Security Service for National Security Vetting (Counter Terrorist Checks, Security Checks and Developed Vetting). Part of the data inputting requires MPS vetting officers to identify if any person named on an applicant's form has "*a surname which originated outside the British Isles?*" There is the potential for this to lead to applicants from different ethnic groups being treated differently.

If a surname is highlighted as originating abroad this will result in certain checks being carried out manually and therefore checks may take longer to complete.

Longer checks may result in applicants dropping out of the recruitment process. This is likely to impact most on applicants from ethnic minorities but no diversity monitoring takes place.

The MPS does not own this part of the process. The MPS must provide the information requested by the Security Service but there is no written guidance on how to identify surnames that originated outside the British Isles. The decision by vetting officers to highlight names of overseas origin is subjective.

The vetting process may be discriminatory and open to challenge. In order to better understand the diversity implications the review team recommends:

Recommendation 8: The MPS should, by June 2005, request written confirmation from the Security Service of the precise difference in approach followed for checking against surnames of overseas origin and why this approach is taken.

Governance Of Future Work

Arrangements need to be put in place to ensure that recommendations from this review and the following related reviews are successfully implemented:

- MPS Inspectorate (March 2003)
- MPA Internal Audit (2000/01)
- Thematic report on Race and Diversity by AC Ghaffur
- Formal investigation of the police service in England and Wales by the CRE
- Bichard Inquiry

Further research is also required on issues raised but not resolved during this review.

MPS Vetting Board and Working Group

The MPS Vetting Board has been created to be responsible for implementation. It is chaired by Commander DPS and includes representatives from all the MPS Business Groups. It will report through the MPS' Corporate Governance Steering Committee (CGSC) to the MPA Planning, Performance and Review Committee (PPRC). The Vetting Working Group will be tasked by and report to the Vetting Board. A separate Implementation Team, made up of representatives from the Business Groups affected, also needs to be created to ensure that the short term recommendations of this review are progressed and that a more detailed, resourced implementation plan is agreed, developed and monitored.

Bichard Inquiry

Recommendations in the report of the Bichard Inquiry affect the MPS' vetting process in two different ways.

Character Enquiry Centre, who currently vet people applying to have access to children and vulnerable adults, will be required to adopt IT systems which will enable more effective searching of Force data sources and will ultimately enable links to other Forces' intelligence.

PSG and SB currently vet people who apply to join the MPS and who may live in other Force areas or be employed by other Forces. Any traces found during MPS searches are not routinely fed back to the Home Force of the applicant. In the spirit of the Bichard recommendations relating to better sharing of information and intelligence between Forces, this is something that the MPS should consider doing in future.

Performance Monitoring

The Review identified a clear lack of robust, accurate data for monitoring the performance of the vetting process. Without this data it has been impossible to quantify the size of the problem originally raised as the reason for the review i.e. that the time taken to complete security clearances was reducing local effectiveness whilst units waited for new employees to join and creating costs due to prospective employees taking up offers of alternative employment with other organisations. Proxy measures have had to be used instead, such as the impact on the underspend in police staff budget.

Some performance data is currently collected by both PSG and SB, and PSG produces a monthly management report (MMR). However, the data gathered and the format and content of the MMR needs to be reviewed in the light of the recommendations from this review.

The assessment of the management information required should include consideration of the costs and benefits of collecting the data, for example, the burdens imposed on local units who would be required to collect data about the reasons why people drop out of the process.

Extensive process maps have been produced during the review and these should be used to identify where measures are needed.

Recommendation 9: An Implementation Team, made up of representatives from the Business Groups affected, is set up, by April 2005, to progress the short-term recommendations and create a more detailed implementation plan.

Recommendation 10: Overseeing the implementation of the recommendations from the MPS Inspectorate, MPA Internal Audit and Thematic Report on Race and Diversity, should fall to the MPS Vetting Board from April 2005.

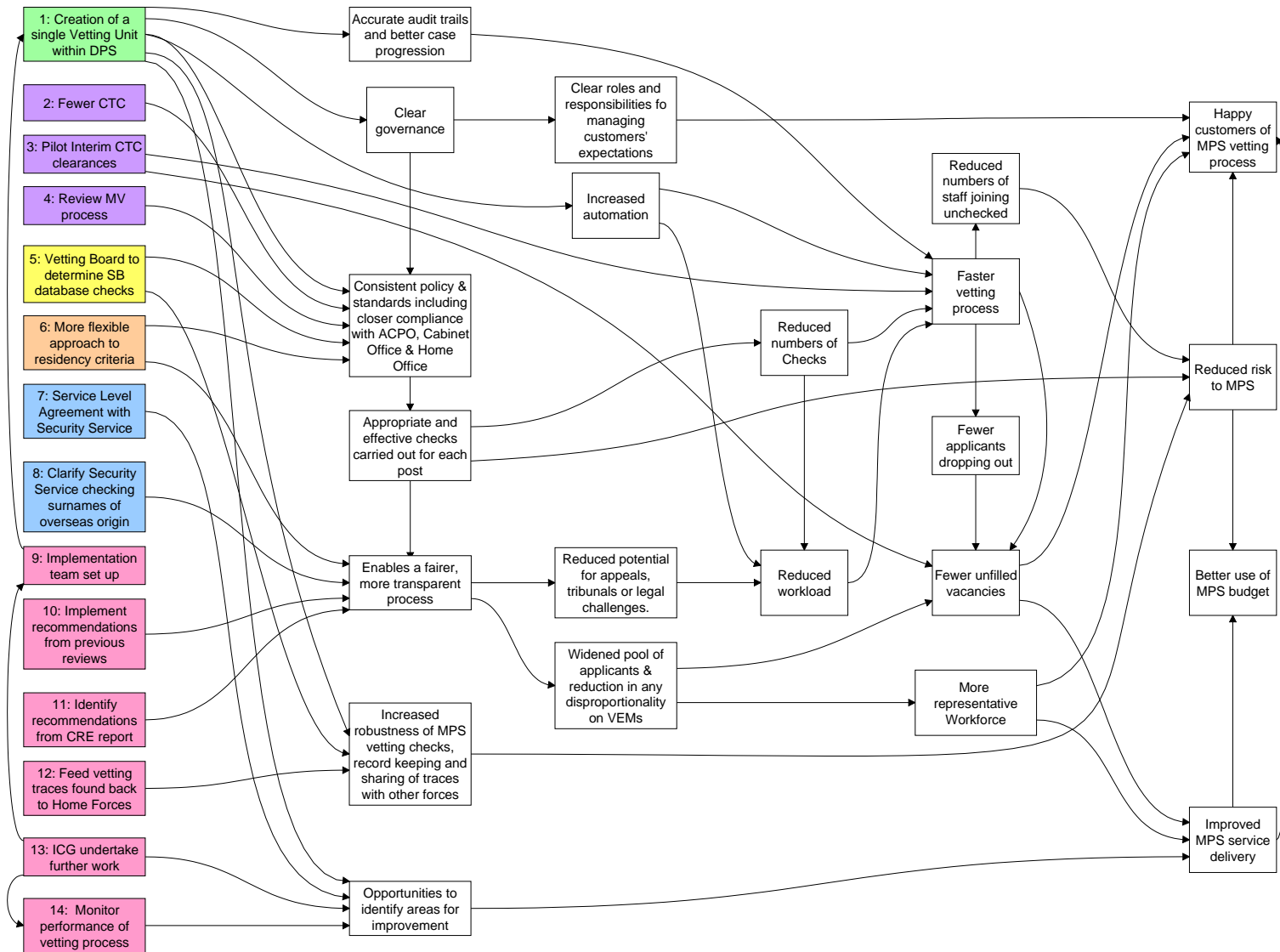
Recommendation 11: The MPS Vetting Board should identify, by July 2005, any recommendations from the CRE report which relate to vetting and ensure any implications for the MPS are taken into account.

Recommendation 12: The MPS Vetting Board considers, by July 2005, how traces found during employment vetting searches can be fed back to Home Forces.

Recommendation 13: ICG undertakes work, starting in April 2005, to address Problems 2 and 3 identified during the review.

Recommendation 14: A comprehensive system is developed, by June 2005, for monitoring the performance of the vetting process, using the existing process maps and taking into account the costs and benefits of collecting the data.

Summary Of Benefits Flowing From Recommendations



Overview Of Implementation Timescales

2 nd Qtr. 2005	3 rd Qtr. 2005	1 st Qtr. 2006	2 nd Qtr. 2006
Recommendation 9: Implementation team set up	Recommendation 11: VB identify recs. from CRE report	Recommendation 5: Vetting Board to determine SB database checks	Recommendation 1: Creation of a single MPS Vetting Unit within DPS. Revisit the issue of amalgamating the SC and DV functions to identify whether it is appropriate to give further consideration
	Recommendation 12: Traces found during vetting searches fed back to Home Forces		
Recommendation 10: Implement recs. From previous Internal Audit and MPS Inspectorate on Race and Diversity	Recommendation 14: Monitoring the performance of the vetting process	Recommendation 4: Review MV process	
	Recommendation 6: More flexible application to residency criteria		
Recommendation 13: ICG undertake further work identified in the review	Recommendation 7: MPS agrees SLA with Security Service		
Recommendation 3: A pilot process to test the viability of granting interim clearances	Recommendation 8: Review Security Service checking surnames of overseas origin		
	Recommendation 2: Removal of obligatory CTC		