

Summary of progress against MPA Vetting Audit actions. DARA update 23.5.11

Ref	Recommendation	Risk	Agreed	Update	Target
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	Completed	
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	Completed	
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 • Includes clearly defined roles and responsibilities • Sets out governance arrangements including the remit of the Departmental Vetting Officer • 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 • Sets out monitoring and review activities • 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. 	H	<p>Y</p> <p>Y</p> <p>Y</p> <p>Y</p> <p>Y</p> <p>Y</p> <p>Y</p> <p>Y</p> <p>N</p>	<p>In progress.</p> <p>The revised MPS Vetting Policy and SOPs will formally capture this requirement. The revised draft is being quality assured before final comments and consultation.</p> <p>Whilst the draft policy will be ready in March it is unlikely to be approved until next FY.</p> <p>Further consultation with the unions will be required in addition to key stakeholders to support getting approval and support for the policy prior to publication.</p> <p>Elements that can be done independently (e.g. monitoring and review activities are already in place).</p> <p>The decision making framework is progressing well.</p> <p>May 2011 Update: Draft Policy and SOP discussed at Vetting Board on 13 May 2011. Overall the new documents were positively received. Care is being taken to strike the correct balance between protecting the MPS and ensuring a reasonable and proportionate approach to vetting and vetting board discussions reflected this commitment. Stakeholder feedback is currently being incorporated and legal service is reviewing the draft. EIA will be ready in June 2010. On track for approval Summer 2011.</p>	Aug 2011
6.4.3	Management checks are put in place to monitor compliance with appropriate, national and corporate policies and procedures.	M	Y	Business as usual	
7.1.1	The sponsor list held is reviewed and updated.	M	Y	Business as usual	
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	Business as usual	

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<p>7.2.1</p>	<p>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:</p> <ul style="list-style-type: none"> • produce lists of designated staff posts and the clearance level required clearly showing the rationale used, • ensure that the level of clearance required is included in staff Job Descriptions, • maintain details of clearance requests submitted to central vetting units. 	<p>M</p>	<p>Y</p> <p>Y</p> <p>Y</p> <p>Y</p>	<p style="text-align: center;">Business as usual</p> <p>The MPS Vetting unit assesses all requests for enhanced vetting to ensure they are appropriately set. The Unit is also working with OCUs to review vetting requirements for key roles e.g. MIB and PND users, IT Routine Update staff. A list of OCU contacts is maintained.</p> <p style="text-align: center;">In progress</p> <p>The revised vetting policy will capture a sustainable process to ensure enhanced vetting requirement for the MPS are known and the vetting for all new roles is appropriately set. This work will be coordinated by the Vetting Unit and will work with OCU SMTs rather than business groups.</p> <p style="text-align: center;">Completed.</p> <p>List compiled by MPS Vetting Unit. Review underway to ensure these requirements are up to date.</p> <p>Management of list is now business as usual. Process will be captured in new vetting policy. A review of there requirements is underway to ensure the list is up to date and is due to complete Oct 2011.</p> <p style="text-align: center;">Business as usual</p> <p>Job adverts specify when enhanced vetting is required for a role.</p> <p style="text-align: center;">Business as usual</p> <p>Compliance will be reviewed following the implementation of THR.</p>	
<p>7.2.2</p>	<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>	<p>M</p>	<p>Y</p>	<p style="text-align: center;">In progress</p> <p>We are supporting a number of OCUs across the MPS to check that employees have the appropriate level of vetting. Eg MIB for PND roll out, SO15 and DoI's Service Delivery Group. The scheduled vetting renewals plan will also assist. This will be business as usual before the end of FY11/12.</p>	<p>Ongoing</p>
<p>7.5</p>	<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 	<p>H</p>	<p>Y</p>	<p style="text-align: center;">Business as usual</p> <p>Compliance is best with larger clients.</p> <p style="text-align: center;">In progress</p> <p>The IAM project will capture all itinerate workers in the MPS. DoI lead on this and the MPS Vetting Nit is supporting this project.</p>	<p>Tbc Pending IAM rollout.</p>

- 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

Y

Mitigated.

System administrator and physical security departments may be best placed to audit access with support from Vetting. The imminent roll of IAM will assist. E.g. PND users have a responsibility to demonstrate they are vetted to the appropriate level before their accounts are activated. MIB have coordinated this work.

Without a Warrantor number linked to a valid vetting clearance, new IT accounts can not be set up and passes can not be issued. After a pass is issued, it will still need to be programmed to gain access to designated sites including NSY and ESB. Nb: Non police personnel passes show an expiry date linked to their vetting clearance.

The revised MPS Vetting Policy places a requirement on Security Controllers to inform vetting of any changes to their register of non police personnel so vetting records can be managed accordingly.

The renewals programme will ensure that all staff have a valid vetting clearance who required access to MPS systems and premises. For non police personnel, this is for Security Controllers to manage.

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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 style="text-align: center;">In Progress</p> <p>Since November 2010, all cases are now entered on a single case management system. All results for employees are also entered onto Met HR and have been since Oct 2010.</p> <p>All employees who hold vetting will have their Met HR record update with details of their vetting clearance before the end of this FY.</p> <p>The vetting case management system is being upgraded so the database of employees and NPPV vetting status can be managed appropriately. This upgrade should be completed by Nov 2011.</p> <p>There is a need to back record convert records from older systems. Provision is being made for this in the business plan for the next FY. Cases not due for renewal in the short term will be prioritised.</p> <p>It is anticipated significant progress will be made on this issue over the course of the next FY. However, with current resourcing levels it is unlikely that this will be completed next FY without impacting on core vetting performance as this is a substantial project.</p> <p>The MPS vetting unit are planning to complete up to 7,000 renewals this FY which should help increase the accuracy of HR records as well as ensuring staff hold valid and appropriate clearance. Completing renewals will also assist in completing the back record conversion of the old NSVU data.</p>	tbc
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 any change in circumstances that may affect an individuals' clearance. 	M	Y	<p style="text-align: center;">In progress</p> <p>The vetting policy review has identified a more sustainable approach to managing renewals will be for the MPS vetting Unit to coordinate the administration of this process. This is because individuals and managers currently are unable to view Vetting Clearance on Met HR and to make use of the case management software functionality that can assist in managing this process.</p> <p>The MPS Vetting Unit is planning to complete up to 7000 renewals next year.</p> <p style="text-align: center;">Business as usual</p> <p>This requirement will be capture formally in the revised Vetting SOP.</p>	BAU from FY 11/12 onwards

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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	<p style="text-align: center;">Controlled.</p> <p>This must be driven by individuals taking responsibility as an automated process linked to Met HR is not available and even this can not capture all eventualities. A communications campaign is planned next FY to raise awareness of individual's responsibility to do this.</p> <p>For staff holding any type of enhanced vetting clearance, a form is sent out annually to check personal details and to request notification of changes in circumstances are submitted to the Vetting Unit.</p>	
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	N/A	
7.10	<p>In setting the Key Performance indicators for the new amalgamated unit, the Unit Head:-</p> <ul style="list-style-type: none"> • Sets and agrees in liaison with Key Stakeholders performance targets for processing security clearances within a specified timescale. • 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. 	M	Y	<p style="text-align: center;">Completed.</p> <p style="text-align: center;">Vetting Board agreed KPIs 7/1/11</p> <p style="text-align: center;">Business as usual Vetting Board oversees performance.</p> <p style="text-align: center;">Business as usual</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 style="text-align: center;">In progress</p> <p>See 7.5 - re system upgrade. The facility to distinguish between live cases, current cases and leavers is being developed. We anticipate the upgrade should be in place by Nov 2011. However. Recent delays regarding signing of the new contract may cause slippage. This date will be reviewed next month.</p> <p>Notice of dismissals is received directly from HR. A request has been made to People Services to ensure all leavers details (and a summary reason for leaving) are routinely sent to vetting so our database can be get up to date.</p>	Nov 11
7.12.1	Back up tapes are held off site.	M	Y	<p style="text-align: center;">Mitigated</p> <p>Tapes held in NSY TB -pending completion corporate integration of case management system with full disaster recovery capability. Full disaster recovery will be in place by July 2011 following integration go live on 13 June 2011.</p>	April 2011

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7.12.2	Reports are produced from the systems to show any deletions, additions and changes to records and reports are reviewed by an independent person.	M	Y	<p style="text-align: center;">Not started</p> <p>This requires significant upgrade to the current software system. Budget is currently not available to upgrade the system in this way. The upgrade described in 7.5 will facilitate progress towards being able to manage the database in this way.</p>	
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	<p style="text-align: center;">In progress</p> <p>The revised vetting policy and sop sets out the procedures for retention and destruction of files, data protection duties and disclosure requirements. Policy Due for Publication this summer.</p>	Aug 2011
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	<p style="text-align: center;">Completed</p> <p>Reporting requirements are being refreshed now all parts of vetting have been subject to the same reporting regime for some months. QA processes have been enhanced, with more resource being invested in QA.</p>	

Updated by Ruth Child, Head MPS Vetting Unit on 23/5/11