



MANAGEMENT VETTING AND ENHANCED MANGEMENT VETTING STANDARD OPERATING PROCEDURE

MANAGEMENT VETTING STANDARD OPERATING PROCEDURE (SOP)			
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PORTFOLIO	Deputy Chief Constable		
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1 INTRODUCTION

- 1.1 This procedure enforces and is subject to the conditions of the Vetting Policy (Policy/247/10).
- 1.2 The purpose of 'Management Vetting (MV) and Enhanced Management Vetting' (EMV) is to provide a means of ensuring that persons serving in 'designated posts'; which are those with access to sensitive police premises, information, intelligence, financial or operational assets; have been assessed as to their reliability and integrity. The procedure therefore serves to reduce the risks of unauthorised disclosure, or loss of, sensitive police assets. A list of those posts subject to MV is shown in the Recruitment Vetting SOP [Appendix A](#).
- 1.3 It is recommended that all persons with long term, frequent and uncontrolled access to SECRET – POLICE, and occasional access to TOP SECRET – POLICE assets, should hold MV clearance. Those who require regular and uncontrolled access to TOP SECRET – POLICE assets should hold EMV clearance. The EMV procedure has been developed to formalise the recommendation made in Version 1 of this policy that additional checks should be added to the MV procedure to counter specific threats.
- 1.4 Investigations conducted within British Transport Police (BTP) and in other police forces and agencies have revealed that criminals are currently targeting members of the police community and non-police personnel working within the police community, with a view to obtaining information to assist them in the furtherance of their criminal activities. Investigations have also revealed that information is being sought by employees of press agencies and by private detectives.



- 1.5 This procedure applies to England, Wales and Scotland.
- 1.6 This procedure applies to all BTP employees, community volunteers, members of other agencies and those acting on its behalf.

2 KNOWLEDGE

2.1 Terms and Definitions

- 2.1.1 Baseline Checks – these are the checks undertaken by the vetting unit on receipt of the Personal Information Questionnaire and Vetting Verification Record (see Associated Documents).
- 2.1.2 Management Vetting Questionnaire (MV1) – this is the form that is used to record details of the applicant in relation to Management Vetting.
- 2.1.3 Enhanced Management Vetting Questionnaire (EMV1) – this is the form that is used to record details of the applicant in relation to Management Vetting.
- 2.1.4 Vetting Verification Record – this is the form that is completed by the recruiting department to ensure that the necessary identity documents have been checked and that this is submitted together with the Personal Information Questionnaire (PIQ). Where there is any doubt in relation to identity documents this should be referred to the Force Vetting Officer (FVO)/Professional Standards Department (PSD) Integrity Unit.
- 2.1.4 Non Police Personnel – these are persons working with BTP who are not recruited as Police employees (e.g. contractors, consultants, etc).
- 2.1.5 National Security Vetting (NSV) - the purpose of NSV (Counter Terrorist Check (CTC) and Security Check (SC) is to protect sensitive government security information, by providing an acceptable level of assurance as to the integrity of individuals who have access to protectively marked government assets and/or who require access to



persons, sites and materials, at risk of terrorist attack. A list of those posts subject to NSV is available at [Appendix A](#) of the [Recruitment Vetting SOP](#). Further guidance in relation to NSV can be found in the NSV SOP. Where an applicant requires clearance to SC level they must go through the MV process first.

2.2 Responsibilities

- 2.2.1 The Deputy Chief Constable (DCC) is responsible for ensuring that there are appropriate structures and resources in place to provide effective vetting processes throughout BTP.
- 2.2.2 The FVO is responsible for establishing vetting policies, procedures and standards for BTP and implementing processes in line with ACPO National Vetting Policy for the Police Community.
- 2.2.3 Departmental Heads and Area Commanders are responsible for ensuring that all staff who are responsible for recruitment (including non police personnel) follow established policies, procedures and standards before allowing anyone access to BTP premises or information. They should report any non compliance with policies and procedures to the Force Vetting Officer.

3 OVERVIEW

3.1 MV/EMV - BTP

- 3.1.1 All persons identified in [Appendix A](#) to the [Recruitment Vetting SOP](#) will be required to be vetted to MV/EMV level. MV will allow personnel access to **police marked** assets up to SECRET – POLICE and occasional access to TOP SECRET – POLICE and EMV will allow regular and uncontrolled access to TOP SECRET – POLICE assets.
- 3.1.2 Foreign nationality is not an automatic bar to recruitment or to granting a vetting clearance. However, all personnel applying for posts subject to MV must have a minimum period of 5 years continuous residency. In exceptional circumstances where

minimum residency cannot be met, then guidance should be sought from the FVO. Additionally where police staff are subject to NSV then national rules with regard to residency will apply (minimum residency for Counter Terrorist Checks (CTC) is 3 years and for Security Clearance (SC) 5 years. The final decision in relation to acceptable residency time limits resides with the FVO.

- 3.1.3 In **EXCEPTIONAL** circumstances, a Chief Officer may elect to depart from strict application of the residency criteria. Such departure will require the authority of a Chief Officer and **MUST** follow the submission of both a business case and full risk assessment conducted on an individual case by case basis i.e. no blanket appointments will be permissible
- 3.1.4 Applicants (regardless of whether they are police staff or Non-Police Personnel) will complete the MV1 or EMV1. The completed questionnaires together with the Vetting Verification Form (see Associated Documents) should be forwarded by the Recruitment Department to the Specialist Vetting Officer (SVO).
- 3.1.5 Staff already in post will be encouraged to take part in the process but, if they refuse or fail the vetting process, line managers together with the FVO will need to assess the risk and decide whether it is practical to allow them to continue in the role whilst preventing the need for them to access sensitive material. Police officers who refuse to undergo the procedure, and the access to sensitive cannot be controlled then consideration must be given to transferring them to other duties. However, for police staff contractual conditions may make their redeployment more difficult and may, in the most extreme cases, require termination of their contract. This decision would only be made at the appropriate Departmental ACPO level and following consultation with Human Resources and the relevant staff association or recognised Trade Union.
- 3.1.6 Existing members of staff will be permitted to remain in 'designated posts' whilst the vetting procedure is carried out. New appointees should not be appointed until after

vetting clearance has been granted.

3.1.7 Where applicants are transferring from another force and are currently MV then the SVO will make enquiries with the parent force to confirm that status and will transfer the MV to BTP.

3.2 MV/EMV Vetting Process

3.2.1 MV/EMV will only be conducted on the successful candidate. The SVO will not pre-vet short-listed staff. Successful candidates will then be required to complete the MV1/EMV1 form as soon as practicable and appropriate

3.2.3 Once received the SVO should carry out the following checks prior to submission to the relevant vetting unit: (See Appendix 1)

- Check for completeness of the MV1/EMV1 form
- Check that candidate meets guidance on suitability
- Check Identity Documents
- Check Proof of Residency Documents

3.2.4 If the applicant does not meet the criteria as shown at [Appendix A](#) to the [Recruitment Vetting SOP](#) the SVO will make a record in case of any future applications or enquiries are made from other Home Office Police Forces.

3.2.5 On receipt of the completed MV1/EMV1 and Vetting Verification Record the SVO will carry out the following:

MV

- Check Vetting Verification Record for correct recording of applicant details and Identity/Residency documents checked;
- PNC/FIS/Crime Recording (applicant, partner/spouse and immediate family members shown on questionnaire);
- Despatch Supervisor Letter (MV2) as appropriate;



- SB Checks;
- Local checks with Home Office Force (applicant and partner/spouse/those shown on form) via INI;
- Financial Checks (credit reference check);
- Professional Standards Checks (as appropriate);
- Liaison with Occupational Health as appropriate;
- Interviews with current and former supervisors to be conducted at the discretion of the SVO;
- Interview with the person subject to MV to be conducted at the discretion of the SVO;
- Internet Open source checks;

3.2.6 EMV1 Checks as above, plus

- Enhanced financial questionnaire
- Credit reference check on spouse or partner (where applicable – consent **must** be provided for this by spouse / partner);
- Mandatory interviews with persons subject of the vetting procedure
- Personnel files;
- Peer references;
- Medical assessment by Force Medical Officer (FMO);
- References;
- Enquiries and interviews with current and former supervisors.

3.2.7 The purpose of financial checks is to assess whether applicants are or have been in serious financial difficulty, or show signs of financial irresponsibility to the extent they could become vulnerable to financial inducement. The financial scoring system used for EMV1 is based on the Cabinet Office system for NSV. The assessment form allows comparison between the information contained in the financial questionnaire and that provided by the credit reference check.



3.2.8 The financial questionnaire seeks to gather information in the following seven areas:

- Indications of previous financial unreliability.
- Problems meeting current commitments.
- Indications of poor financial judgement.
- Potential for future financial difficulties.
- Assets possibly inconsistent with income.
- Potential conflict of interest.
- Business interests.

3.3 Factors which may create a presumption of unfitness

3.3.1 The following factors may, through dishonesty or lack of integrity, create a presumption of unfitness for employment in 'designated posts'

- Past infringement of security or vetting policy or procedures.
- Significant or repeated breaches of discipline.
- Providing false or deliberately misleading information, or omitting significant information from the vetting questionnaires.
- Unauthorised association with persons with previous convictions or reasonably suspected of being involved in crime of which BTP is not aware of.
- Criminal convictions or cautions.

3.4 Circumstances which may impair judgement

3.4.1 The following circumstances are regarded as likely to impair judgement, or may result in vulnerability to pressure or inducements:

- Significant financial difficulties or debts
- Misuse of alcohol
- Gambling
- Misuse of controlled or prescribed drugs
- When an Occupational Health Officer certifies that employment in such posts could present a risk to the confidentiality, integrity or availability of intelligence



assets through defects in judgement. (In these circumstances the Occupational Health Manager will advise the post holders to notify their immediate or senior supervisors, and will notify the Force Vetting Officer of his decision).

3.5 Assessing the criteria for trustworthiness

3.5.1 In making an assessment as to whether or not to grant MV or EMV1 clearances the following matters will be taken into consideration:

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

3.5.2 Great care should be taken when considering information revealed as part of the vetting process which relates to medical issues. Neither police officers nor members of vetting staff are qualified to make such an assessment of medical conditions or mental health. Therefore, any medical information such as intelligence reports or allegations etc. revealed as part of the vetting process must be passed to the Occupational Health Unit for a full professional assessment to be made.

3.5.3 Following such an assessment the Occupational Health Unit will decide if the applicant is suitable for appointment within BTP. Under no circumstances should any medical information be passed to Force Vetting Units.

3.6 Following a decision to grant clearance

3.6.1 The FVO will ensure that in cases where clearance is granted, any reservations or limitations are clearly recorded, and clearances notified in writing to Area Commanders

and Heads of Departments. The subject should be made aware that any limitations will be notified to their line management.

- 3.6.2 In notifying individuals that vetting clearance has been granted, they will be reminded of their responsibilities for protecting both BTP's and National Security assets, and of the requirements of the Data Protection Act, Official Secrets Acts, Computer Misuse Act and BTP security policies and procedures.
- 3.6.3 If clearance is refused, or there are any limitations to the clearance the FVO will inform the individual, and where possible, they will be provided with an explanation. However, there may be circumstances, for example in cases where notification could prejudice a criminal or disciplinary inquiry, or when disclosure would breach the Data Protection Act or other legislation, where information may be withheld. In addition, information may have been provided by third parties, in confidence, during vetting inquiries. Such information will only be disclosed to the subject if the person who has provided the information agrees to its disclosure.
- 3.6.4 Because of a lack of relevant background information, temporary staff, those on work experience, or persons under 17 years of age, will not be employed in departments or units which include 'designated posts', without the authority of the FVO.

3.7 Appeals

- 3.7.1 If an existing staff member disputes the decision to refuse, withdraw or suspend MV clearance, a letter of appeal may be forwarded via the FVO to the appropriate departmental ACPO officer within 14 calendar days of receipt of a written notification of the decision. The nominated officer, or during periods of absence, another ACPO officer, will review the case within 28 days of receipt of the letter of appeal. The individual will be given the opportunity to make personal representation and may be accompanied by a colleague, support group member or staff association representative. The appropriate departmental ACPO officer conducting the appeal will

provide the applicant with a written statement outlining the result of the appeal. The decision reached will be final.

3.7.2 External applicants for MV posts have no right of appeal against a decision not to grant them vetting clearance. They do however; have the right to an internal review. A letter requesting a review may be forwarded to a FVO within 14 days of receipt of written notification of the decision. The review will be conducted by the Head of PSD who will review the original decision within 28 days of receipt of the letter of review and will provide the applicant with a written statement outlining the result of the review. The decision reached will be final. There is no right to personal representation at a review.

3.8 Aftercare

3.8.1 MV and EMV clearances will be renewed every 5 years. However, any clearance may be reviewed at an earlier stage if adverse information comes to light relating to the subject, or there is a material change in an individual's personal circumstances. In addition, all MV and EMV clearances should be the subject of a formal annual assessment, involving line managers.

3.8.2 All personnel subject to MV and EMV will undertake an annual assessment (MV3). Changes in the personal circumstances of individuals holding MV or EMV clearances may impact upon their continued suitability to hold that clearance. They must therefore report any relevant changes, including spouses, partners or civil partners, changes of address, criminal associations, or other matters relating to the risk factors outlined above in writing, to the FVO. It is also the responsibility of line managers to ensure that the FVO is notified of relevant changes coming to their attention as soon as practicable.

3.8.3 At the time of clearance, post holders should be informed that failure to notify relevant changes could result in the withdrawal of their vetting clearance. However, staff should be aware they can report any changes in the knowledge that notifications will be met



with a sympathetic response, and that it would only be in the most serious cases that consideration would be given to the withdrawal of clearance.

3.8.4 Individuals with MV or EMV clearances who transfer to a 'non-designated' post will retain their vetting clearance for up to 12 months from the date of transfer from the designated post. At that time the clearance will lapse. Annual assessments will no longer apply after individuals leave an MV or EMV post. If they transfer back to an MV or EMV post within 12 months of leaving, their MV or EMV clearance will remain valid until the renewal period, subject to an annual assessment.

3.8.5 If an individual with MV or EMV clearance transfers to another force or agency, the vetting status will remain valid until the renewal date, subject to the satisfactory completion of an annual assessment form, for the information of the receiving force. The receiving force retains the right to require an individual to complete the full MV process.

3.9 Retention of MV Vetting Records

3.9.1 All records related to a vetting subject will be filed together and kept for the following periods:

- 6 years after any vetting clearance is refused or withdrawn;
- 6 months after leaving BTP all working documents will be securely destroyed.

4. MONITORING AND COMPLIANCE

4.1 This SOP and Vetting Policy will be monitored by the FVO to ensure compliance with National Guidelines issued by ACPO Professional Standards in relation to vetting.

4.2 The FVO will also conduct checks against Establishment Lists to ensure that all new personnel have been correctly vetted to the appropriate level.



5. ASSOCIATED DOCUMENTS

- 5.1 Management Vetting Questionnaire (MV1).
- 5.2 Enhanced Management Vetting Questionnaire (EMV1)
- 5.3 Vetting Verification Record.
- 5.4 National Security Vetting Standard Operating Procedures.
- 5.5 Conviction, Caution and Financial Criteria Standard Operating Procedures.
- 5.6 Transfer of Police Officers within the Police Community.
- 5.7 Supervisors Reference (MV2).
- 5.8 Annual Assessment Form (MV3).

Appendix 1 – Management Vetting Flow Chart

