Warwickshire POLICE

Vetting Update Report

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Interim Head of Vetting

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Version: 1.0

Purpose: Update Report to JASC members

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Background:

As well as undertaking internal vetting for all officers and staff, Warwickshire Police has responsibility for the delivery of the National Police Vetting Scheme; providing transferrable contractor vetting within UK policing (at cost) and any other calls for vetting service on an ad-hoc basis.

This is a significant and complex arm of the Warwickshire BAU vetting department; is an income generation provision and has a rapidly growing demand profile. With this comes substantial commercial responsibly and reputational consequences if not managed and maintained effectively. The NPVS has been experiencing challenges in respect of demand vs capability which has resulted in a short, medium and long term plan being implemented for the department

With the high profile cases that have been well publicised in respect of Wayne Couzens, David Carrick and the publication of the HMICFRS thematic inspection into Police Vetting, misconduct and Misogyny in November 2022, there has never been so much scrutiny on, not lack of confidence in police vetting processes; an area where public trust and confidence must be restored.

Purpose:

The purpose of this document is to provide a high level overview of the current position of the Warwickshire Vetting Unit; the challenges that have been faced, immediate pressures and the plan for the future

What is vetting and Why it is important

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One part of a wider umbrella of protective security measures

First line of defence

Snapshot in time – not a panacea

Statutory Footing – Code of Practice and APP – This is not merely guidance

The Vetting Standard

Robust framework; designed to be rigorous but proportionate – getting it right first time

Governance and Oversight

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- Vetting Management Board – DCC Chair
- Business Review Board
- Change Board
- Force Executive Board
- Police Uplift Programme National Board
- Police Uplift Programme Warwickshire Gold Group
- NPCC National Vetting Tasking Group – Supt Campbell Chair (NPCC Staff Officer / Silver)
- NPCC National Vetting Working Group – CC Tedds Chair (NPCC Lead / Gold)
- NPCC Police Vetting, Misconduct and Misogyny national Programme (Supt Campbell Programme Director)
- HMICFRS PEEL and Thematic Inspections

Progress around Police Vetting, misconduct and Misogyny Inspection Recommendations (Vetting)

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Recommendation Number	Content	Owner	Delivery due date
2	By 30 April 2023, chief constables should establish and begin operation of a process to identify, within their vetting IT systems, vetting clearance records where: • applicants have committed criminal offences; and/or • the record contains other types of concerning adverse information.	SM	30/04/2023
3	By 30 April 2023, chief constables should take steps to make sure that, when granting vetting clearance to applicants with concerning adverse information about them: • vetting units, counter-corruption units, professional standards departments, and HR departments (working together where necessary) create and implement effective risk mitigation strategies; • these units have enough capacity and capability for this purpose; • responsibilities for implementing specific elements of the risk mitigation strategy are clearly defined; and • there is robust oversight.	RC	30/04/2023
4	By 30 April 2023, chief constables should make sure that, when concerning adverse information has been identified during the vetting process, all vetting decisions (refusals, clearances and appeals) are supported with a sufficiently detailed written rationale that: • follows the National Decision Model; • includes the identification of all relevant risks; and • takes full account of the relevant risk factors described in the Vetting Authorised Professional Practice.	JG	30/04/2023
7	By 31 October 2023, chief constables should introduce an effective quality assurance process to review vetting decisions, including routine dip sampling of: • rejections; and • clearances where the vetting process revealed concerning adverse information.	RC	31/10/2023
8	By 30 April 2023, chief constables should make sure they comply with the Vetting Authorised Professional Practice by analysing vetting data to identify, understand and respond to any disproportionality.	SR	30/04/2023
11	By 30 April 2023, chief constables who have not already done so should establish and begin operation of a policy requiring that, at the conclusion of misconduct proceedings where an officer, special constable or member of staff has been issued with a written warning or a final written warning, or been reduced in rank, their vetting status is reviewed.	JC	30/04/2023
13	By 31 October 2023, chief constables who have not already done so should establish and begin operation of a process to: • identify the required vetting level for all posts within the force, including designated posts requiring management vetting; and • determine the vetting status of all police officers and staff in designated posts. As soon as possible after this, these chief constables should: • make sure that all designated postholders are vetted to the enhanced (management vetting) level using all the minimum checks listed in the Vetting Authorised Professional Practice; and • give continued assurance that designated postholders always have the requisite level of vetting.	RC	31/10/2023
15	By 30 April 2023, chief constables should: • make sure that all police officers and staff are made aware of the requirement to report any changes to their personal circumstances; • establish a process through which all parts of the organisation that need to know about reported changes, particularly the force vetting unit, are always made aware of them; and • make sure that where a change of circumstances creates additional risks, these are fully documented and assessed. If necessary, additional risks should lead to a review of the individual's vetting status.	JC	30/04/2023

HMICFRS

His Majesty's Inspectorate of Constabulary and Fire & Rescue Services

	Areas For Improvement		
1	Forces' use of vetting interviews is an area for improvement. In more cases, forces should interview applicants to explore adverse information of relevance to the case. This should help with assessing risk. When they carry out such interviews, forces should maintain accurate records and give copies of these to interviewees.	LC	As soon as practicable
2	Automated links between force vetting and HR IT systems are an area for improvement. When specifying and procuring new IT systems for these purposes, or developing existing ones, forces should seek to establish automated links between them.	RC	As soon as practicable

Vetting Unit Overview PNVS – The trajectory as of July 2022

- 6500 backlog in July and growing exponentially
- Projected to reach c.12000 by April 2023 (significant risks)
- Recovery plan put in place and a stabilisation and transformation plan developed
- Backlog halved in 8 weeks, back working within SLA by Christmas 2022

Timeline – Plan on a page

Backlog overview – NPPV applications

- For December's Vetting Management Board, the reported figure for the number of applications in Pending was 3833.
- As of 21st February, this figure was 4079, an increase of 6%. The current figure is the highest since 13th November 2022, however it should be noted that when analysing the Pending list and focusing on those applications which haven't been started by a case officer yet (known as 'Awaiting Action'), this figure is currently 2337, compared to December's figure of 2647 (a decrease of 12%).
- The number 'awaiting action' was at it's lowest level in January 2023 (2081), however this is starting to gradually increase
- The numbers of cases in 'awaiting action' are within accepted tolerance levels

Backlog analysis – impact of NCIA (3rd Party Check)

- In December 2022, the vetting unit had a restriction placed on the number of lines of data we're able to send for the NCIA check, a requirement for all vetting clearances.
- We estimate that this restriction has resulted in over 1300 clearances in the Pending list which would ordinarily have been completed, which is over-inflating the number of clearances yet to have been completed. Below shows the estimated backlog (if the NCIA checks were completed within 'normal' timescales) against what the backlog is actually reporting.
- Work is ongoing nationally to address this issue which is a risk if not remedied and pushes us back outside SLA (see next slide)

- The above shows the number of NPPV applications received (blue) and the number completed (green). The points at which the green lines fall below the blue bars shows where the backlog will increase (number of completions is lower than what we're receiving).
- What is clear to see is that from December onwards, the number of completions is continually below the number of applications received, which is a direct result of the applications that are in progress and awaiting NCIA checks to be completed.

Performance

- The above chart is analysis of what is currently awaiting action, and an <u>estimate</u> of the dates that they will be processed and completed. The dates show the date the application was received and the numbers show the working days they will have taken to be completed.
- This will now be impacted on delays with NCIA. At this time, applications being processed today are having to wait 25 working days before they are sent to NCIA, therefore these working days shown above is likely to increase by 25.

Outstanding and Aged Debtors

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- It has recently been discovered that there is a significant outstanding debt from customers who have not paid for clearances. As of 03/03/23, overdue debt was £1,774,721
- Significant work has been undertaken to reduce this debt over recent weeks overseen by the Director of Finance
- Work is being undertaken to develop new and robust processes to ensure that this does not happen in the future
- Management of this risk and the response will be through an internal gold group

Report date	All debt	Current	Total Overdue	Over 90
24/01/2023	2,635,037	582,495	2,052,542	1,518,646
30/01/2023	2,607,714	300,100	2,307,614	1,487,514
31/01/2023	2,746,930	471,200	2,275,730	1,479,220
06/02/2023	2,680,224	447,658	2,232,566	1,448,643
13/02/2023	2,395,701	425,143	1,970,558	1,420,176
16/02/2023	2,243,457	369,402	1,874,055	1,357,507
17/02/2023	2,104,271	361,624	1,742,647	1,226,696
24/02/2023	2,363,116	566,318	1,796,798	1,189,493
28/02/2023	2,392,407	668,663	1,723,744	1,168,237

Next Steps

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- Continue on stabilisation / transformation journey – improving processes
- Delivery of all HMICFRS recommendations in full
- Begin the phased approach to Social Media Searching / Automation through Synalogik
- Recruitment of permanent Head of Vetting
- Development of new business plan/strategy for the future of PNVS
- Continue to contribute nationally in the area of Police Vetting
- Identify long term solution for charging/debt management
- Historical Data Wash / Operation Amethyst