

GREATER MANCHESTER POLICE, FIRE & CRIME PANEL

Date: 18th September 2024

Subject: Update on Police Vetting Procedures and Performance

Report of: Deputy Chief Constable (DCC) Terence Woods

Purpose of Report

To provide the Greater Manchester Police, Fire and Crime Panel with an update on vetting procedures at Greater Manchester Police (GMP), both for new applicants and the existing workforce.

Recommendations:

The Panel is requested to:

1. Note the content of the report and the action taken by GMP's Force Vetting Unit (FVU) to protect the integrity of the Force, safeguarding both the public and the workforce from the risk of corruption and / or behaviour that does not accord with police service values.

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Equalities Impact, Carbon and Sustainability Assessment:

N/A

Risk Management

N/A

Legal Considerations

N/A

Financial Consequences – Revenue

N/A

Financial Consequences – Capital

N/A

Number of attachments to the report:

None

1. Introduction and Background

1. It is vital that the public has trust and confidence in policing. Recent examples of crimes, committed by serving police officers, have severely impacted that trust and confidence and, quite rightly, placed a national focus on police vetting and whether the police vetting regime is fit for purpose.
2. The GMP FVU undertakes the completion of all vetting in compliance with the standards set in the 2023 Vetting Code of Practice and supporting 2021 College of Policing (CoP's) Vetting Authorised Professional Practice (APP). As a statutory code of practice issued under section 39A of the Police Act 1996, the code is the single national standard that must be followed by all forces. It applies to all those engaged on a permanent, temporary, full-time, part-time, casual, consultancy, contracted or volunteer role with GMP, as well as any individuals who apply to join the service. As a result, GMP does not have its own vetting regime and policy, however, operates in compliance with the national standard.
3. Since November 2022, all police vetting has been subject to layers of additive recommendations. These include those contained within the 2022 His Majesty's Inspectorate of Constabulary and Fire and Rescue Service (HMICFRS) report on vetting, misconduct, and misogyny in the police service, and the report arising from Part 1 of the Dame Angiolini Inquiry, following the murder of Sarah Everard by an off-duty Metropolitan Police officer. The Baroness Casey Report (2023), an independent review of the standards behaviour and internal culture of the Metropolitan Police, was also critical of the vetting regime and standards as it applied to this Force.
4. It is anticipated that the latest iteration of the APP (2024) will be released by the College of Policing in December 2024. Its publication has been delayed whilst consideration is given to including requisite changes within its content in response to a number of national vetting recommendations, most latterly those arising from Part 1 of the Dame Angiolini Inquiry.
5. As a unit, the FVU has sought to respond to these changes and deliver against national recommendations in a robust and proportionate manner, with the emphasis on improving public confidence at the forefront of its activity. Future anticipated changes in the police conduct regulations are likely to further impact on police vetting and increase demand.

2. Force Vetting Unit Governance

2.1. Organisational Structure

1. The FVU is a constituent department of GMP's PSD, led operationally by the Force Vetting Manager (FVM), reporting to the Head of PSD who, in turn, reports to the DCC. In addition to the FVM, the FVU comprises of one Senior Vetting Officer (SVO), seven Vetting Officers (VO), three Team Managers, 15 Vetting Researchers (VR) and two Administration Assistants.
2. The FVU has historically found it difficult to recruit and retain VRs. The skill set being one that is competitive across the Force. In response to this, and the demands of the HMICFRS, the FVU recognised the need to invest in the increased provision of VOs, the decision makers, and in 2023 repurposed four existing and vacant VR positions for three VO roles. The VO is the principal decision maker in whether to grant a vetting clearance. This increase in VO capacity has further improved the unit's ability to deliver objective decision making, with the profile and experience of those performing the VO role including former professional standards and Anti-Corruption Unit (ACU) detectives.
3. The Unit's VR capability is split across three teams, each with their own Team Manager and a thematic area of responsibility, specifically (i) officer and staff initial applications, (ii) contractor clearances and (iii) an Aftercare Team managing both reviews and renewals of vetting, and the maintenance of designated posts requiring a higher level of clearance.
4. The three teams ensure greater efficiency and an improved level of competent capability within each individual thematic area of responsibility. The collective focus to rigorously assess integrity, character and motivations of all current and future police personnel through the lifetime of their vetting clearance. Such clarity as to primary responsibilities is the first line of defence in safeguarding against expiration of vetting clearance and / or erroneous granting of clearances that have been the subject of continued criticism of the police service nationally by HMICFRS.
5. The area of vetting aftercare continues to be subject of increased thematic demand. Centred on the review of vetting of all police personnel across the existing workforce, this team ensures clearances are maintained within the timeframes set nationally within the APP on vetting, and takes account of circumstantial changes, for example.

but not limited to, a change of role, receipt of information relating to criminal conduct and / or disciplinary matters, third party associations or a differing financial position.

6. In addition to the focused activity set out at point five above, the Aftercare Team, working in close unison with the ACU and the Complaints and Misconduct Unit (CMU), ensures any risk mitigation that forms part of granting vetting clearance has clear ownership and is effectively monitored and reviewed to ensure it remains effective.
7. In 2024, whilst continuing to deliver both in terms of quality and timeliness, the FVU successfully transferred to a paperless working environment. In addition, hybrid working is currently being trialled. Collectively, this change in working practice, and learning gained from the challenges faced by the unit during the COVID-19, form part of an improved business continuity plan.

2.2. Appeal and Quality Assurance Governance

1. It is expected that some individuals will be dissatisfied with the decision not to grant vetting clearance and, as a matter of organisational justice and procedural fairness against the requirements of the APP on Vetting. GMP operates a Vetting Appeal Panel (VAP) comprising the FVM, Senior VO, Head of ACU and the Force Operational Security (OpSy) Manager.
2. The VAP will only consider appeals on four grounds: specifically new information that was not available to the original VO; the decision was disproportionate; the decision was perverse or unreasonable; and no explanation was given for the decision given. The decision of the VAP is final and, to ensure the panel's legitimacy and integrity, it acts autonomously and free from the possibility of either undue influence from any internal or external stakeholder, or numerical recruitment and selection targets.
3. Responding to the HMICFRS inspection report, the FVU has in place a proactive process for effective dip sampling of those applications and vetting renewals where clearance has either been rejected, or granted in circumstances where adverse information was documented during the process. Rejection dip sampling is informed by the data reported by the PSD Analytics Team in their quarterly disproportionality monitoring reports. The dip sampling is undertaken by a detective inspector (DI) who has competent tactical experience in the application of the APP on vetting.

3. Force Vetting Regime

3.1. Procedure

1. A comprehensive, systematic, and effective vetting regime is essential for assessing an individual's integrity and suitability to work in policing. Vetting identifies areas of vulnerability that could damage public confidence in GMP or the wider police service and, to ensure consistent application of the national standards relating to vetting across the police service of England and Wales, the FVU works to the statutory Vetting Code of Practice (2023) and the associated APP for Vetting (2021). Under section 39A of the Police Act 1996, chief officers must have regard to the statutory Vetting Code of Practice.
2. At the time of writing, the FVU continues to operate in compliance with the 2021 APP, whilst awaiting publication of the delayed 2024 iteration of this document, and the anticipated introduction of statutory Police (Vetting) Regulations (akin to the Police (Conduct) Regulations 2020), in order to align with the new Vetting Code of Practice and a number of outstanding HMICFRS recommendations.
3. As result of the timing of the general election on 4th July 2024, and the consequential change of Government, there is currently an uncertainty as to whether Phase 2 of the Home Office review of police dismissals will be delivered. Prior to the general election, this was forecast to lay the Police (Vetting) Regulations in Parliament soon after the summer recess. Those regulations would have provided for a statutory mechanism to dismiss police officers who were unable to maintain vetting clearance, given that at present, the Police (Performance) Regulations 2020 are the only legislative vehicle potentially available to discharge officers in such circumstances, but with the Metropolitan Police having done so, that application is subject to legal challenge in the High (Administrative) Court, the judgement of which will in turn set a precedent nationally through case law.
4. The following twelve (summarised) principles as listed in the Vetting Code of Practice and APP underpin all decision making within the FVU.

1.	The code applies to all those engaged on a permanent, temporary, full-time, part-time, casual, consultancy, contracted or voluntary basis with the police, as well as individuals who apply to join the service. It also applies to those in partner agencies who have unsupervised access to any police premises or police information that is not publicly available.
2.	<p>Everyone working in a police environment will be vetted to the requisite level including:</p> <ul style="list-style-type: none"> a) Those with unrestricted or unsupervised access to police information, assets of estates. b) Have access to Force or national police systems, directly or remotely. c) Act as a representative of the police service. d) Have the power to make or significantly influence strategic decisions in the police service, including members of partner agencies.
3.	The level of vetting required for a person, for both Force vetting and national security vetting will be proportionate to the role they carry out.
4.	Police vetting should comply with the standards laid out in APP for Vetting.
5.	All vetting information must be stored in a suitable secure manner, with the information being treated confidentiality and accessed by only those with a business need.
6.	Decision making in respect of vetting clearance should be independent of recruitment and other human resources processes. There should be an effective working relationship between FVUs and professional standards departments, including counter corruption units.
7.	Those applying to re-join policing, having left, for example through retirement or other employment must be fully re-vetted prior to commencing working in policing.
8.	To comply with the code of practice, chief constables are required to take specific actions which includes providing sufficient resources and oversight to ensure the effective delivery of vetting take place in their own organisation.

9.	Decisions about vetting status should follow the national decision making (NDM) model and must be accurately recorded.
10.	Where a person is subject to a vetting rejection, they should have a right of appeal to a person independent of the original decision maker.
11.	All police personnel should be subject to periodic re-vetting in accordance with APP for vetting.
12.	There is a rebuttable presumption, subject to the conditions of the Rehabilitation of Offenders Act, that a person will not be suitable to hold vetting clearance if they have a conviction or caution for a criminal offence, especially if it relates to dishonest or corrupt practices, violence, or demonstrates a targeting of persons due to their vulnerabilities or protected characteristics.

5. The minimum level of vetting for all police officers, special constables, and police staff (including police community support officers (PCSO)) is described as Recruitment Vetting (RV) and lasts for a period of ten years. Those with RV clearance are allowed access to materials graded with a Government Security Clearance (GSC) of official-sensitive and occasionally secret.
6. The higher level of vetting clearance for those in designated posts is termed Management Vetting (MV) and lasts for a period of seven years, during which time clearance must be reviewed twice, most commonly at the three and five year mark. The purpose of MV is to provide a means of additional assurance in relation to the integrity, reliability, and potential for financial vulnerability of the individual. It allows access to material graded at GSC secret and, occasionally, top secret.
7. GMP applies a Non-Police Personal Vetting (NPPV) regime against those working in Force who are contractors, volunteers, agency workers, and are employed by partner agencies. There are four NPPV levels as shown in the table below.

Level	GSC material	Occasional access to	Site access	System Access
NPPV1	None	None	Unsupervised	None

NPPV 2 Abbreviated	Official-sensitive	None	Access card no access to Force system	None
NPPV 2 Full	Official-sensitive	Secret	Access card & access to Force systems	Yes
NPPV 3	Secret	Top secret	Access card & access to Force systems	Yes

8. GMP Human Resources (HR) is responsible for ensuring that authentication occurs in order to confirm the applicant's identity, nationality, employment eligibility and residency qualification. This is always completed before the vetting process is started. The nationality check assists GMP in discharging its statutory obligations under the Immigration, Asylum and Nationality Act 2006.
9. Applications for a position as a police officer, a special constable, or as a member of police staff where that member of staff may be in the evidential chain are rejected in all cases where:
 - (a) Offences were committed as an adult or juvenile which resulted in a prison sentence (including custodial, suspended, or deferred sentence and sentences served at a young offender's institution or community home); or
 - (b) The applicant is or has been a registered sex offender or is subject to a registration requirement in respect of any other conviction.
10. Extending on principal twelve within the Vetting Code of Practice, GMP will reject applicants who have a conviction, caution, or impending case where the offence involved the targeting of a vulnerable person, was motivated by hate or discrimination, or related to domestic abuse.
11. Where the applicant has previously come to adverse police attention, for example been arrested or subject of a criminal investigation, but the matter has not resulted in a criminal conviction or caution, a case-by-case assessment will be made that takes into consideration the following factors:
 - (a) Number of allegations.
 - (b) Severity of allegations.
 - (c) Credibility of the allegations including whether irrefutable evidence exists to show them to be false or malicious.
 - (d) Reason for the matters not being progressed.

(e) Age of the subject at the material time.

(f) Amount of time that has passed since the matters being considered.

12. Membership of a proscribed organisation or other group or association that has aims and objectives that are contrary to the Standards of Professional Behaviour, as set down within schedule 2 of the Police (Conduct) Regulations 2020, will result in vetting clearance being refused.

13. In assessing information and intelligence revealed during the vetting process, the FVU applies the following two-stage test:

(a) Are there reasonable grounds for suspecting that the applicant, a family member, or other relevant associate.

i. is or has been involved in criminal activity?

ii. has financial vulnerabilities (applicant only)?

iii. is, or has been, subject to any adverse information?

(b) If so, is it appropriate in all the circumstances to decline vetting clearance?

14. For those employed by the Force, and subject of disciplinary proceedings where an allegation is proven but a sanction short of dismissal is given, the individual's vetting clearance is automatically reviewed by the FVU. The possibilities arising from review are in respect of continuing vetting clearance are granted, granted with conditions, downgraded, or declined. Insofar as the last option is concerned, currently there is no defined statutory gateway available to dismiss a police officer or special constable who cannot achieve even the lowest level of RV. That is a matter on which the National Police Chiefs' Council (NPCC) have engaged the Home Office on, as part of His Majesty's Government Rapid Review into the process of police dismissals.

4. Vetting Demand and Performance

4.1 Applications and Renewals

1. The demands placed on the FVU to process new vetting applications, stemming from the Police Uplift Programme (PUP), continued unabated until the end of quarter two of the 2023 calendar year. The successful completion of uplift saw overall demand for new applications during 2023 reduce by 18.3% across the year. Quarters 3 and 4 predominantly occupied as periods of stabilisation and recovery, with the previous demand from new applications replaced by those within vetting aftercare, an area

subject to a reduced focus during PUP. The table below shows the demand against previous years for new vetting applications.

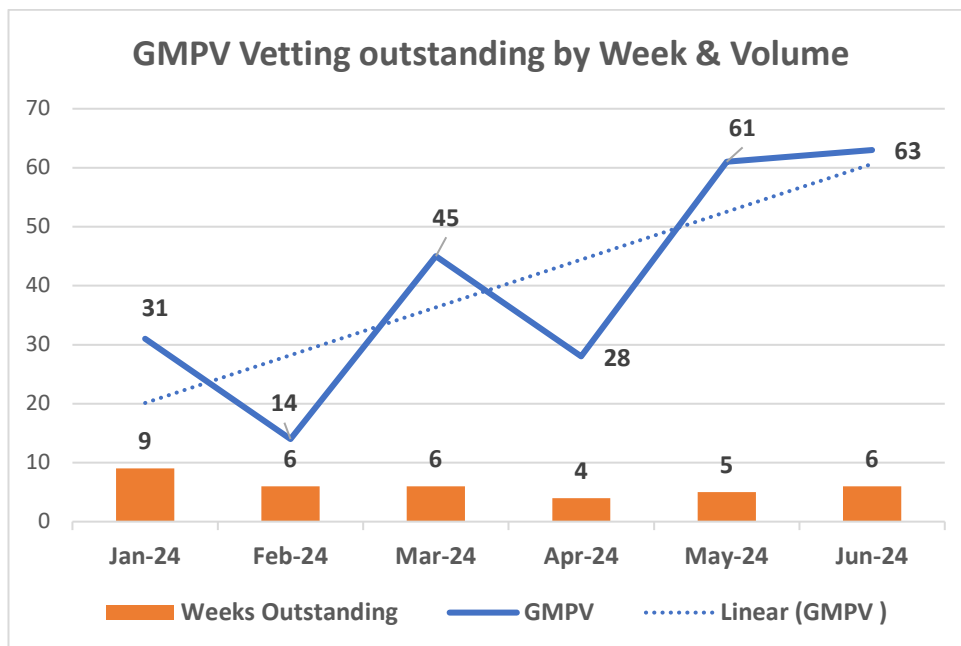
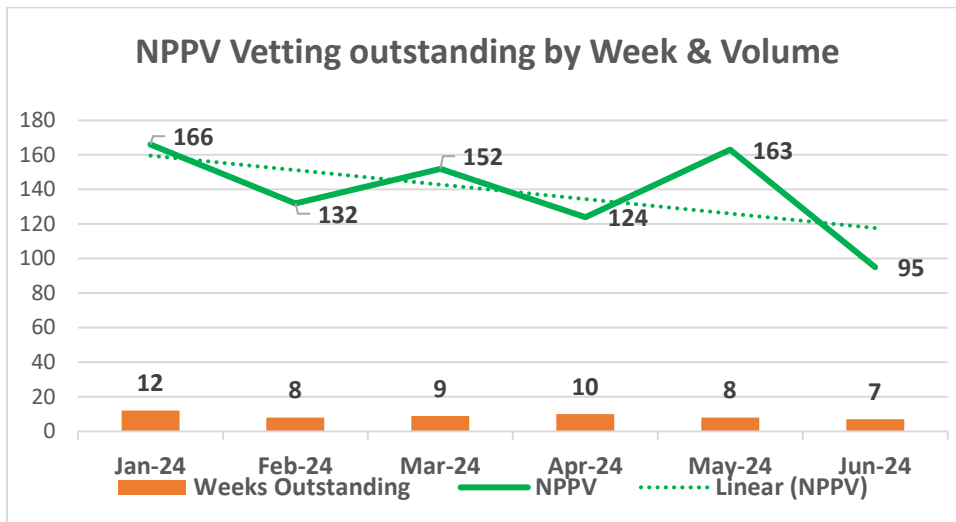
Level	Year 2021	Year 2022	Year 2023	Variance	Percentage
RV	1761	2548	1804	- 744	- 29.1%
MV	123	237	192	- 45	- 18.9%
NPPV	1116	998	1094	+ 96	+ 9.6%
Total	3000	3783	3090	- 693	- 18.3%

2. During 2024, a total of 955 vetting renewals are scheduled for completion during the year. This number consists of 134 carried over from 2023 and 821 due for completion as part of BAU. It is evidence of the FVU's commitment to vetting aftercare that by the end of June 2024, 62% (590) of this total number (955) have now been completed. Accordingly, the FVU is on target to eliminate vetting renewal backlog (referred to in point 2 above) by the end of this calendar year.
3. This recovery, stabilisation and improved performance is beyond that of numeric data. In direct response to HMICFRS recommendations, the FVU has increased the number of vetting interviews undertaken in support of vetting aftercare. This includes gaining a greater understanding and mitigating risk presented by instances of applicant financial vulnerability. The table below shows the number of vetting renewals completed during 2023 when compared against previous years.

Level	Year 2021	Year 2022	Year 2023	Variance	Percentage
RV	39	119	755	+636	+634%
MV	79	46	245	+199	+433%
NPPV	304	156	116	- 96	-25%
Total	422	321	1116	+795	+348%

4.2 Vetting Timeliness

1. In a competitive employment market, the challenges faced in recruiting police personnel includes the HR objective to meet recruitment targets, against the FVU objective to admit only those with sufficiently high levels of integrity. The position of the GMP FVU is unwavering in ensuring the latter takes priority and that public confidence in policing and police vetting is maintained.
2. During 2023, the FVU has continued to support the Force's priority recruitment areas that are aligned to specified intake dates and Plan on a Page (POAP) work streams. Where the requirement to complete vetting is in support of specific volume intake dates, this is referred to as 'batch recruitment.' During 2023, that included the recruitment of student officers, police officer transferees, Special Constabulary, Force Contact Crime and Operations (FCCO) Branch personnel, apprentices and custody detention officers (CDOs). Throughout 2023, the FVU has consistently met the point in time vetting requirements for all areas of batch recruitment, providing a quality vetting service in a timely manner.
3. In addition to the 'batch recruitment' activity set out at point 2 above, the FVU has continued to service the vetting requirement of all other areas of the Force, referred to as 'non-batch' recruitment including new police staff applications, police officer and police staff internal moves and non-police personnel vetting for persons not employed by the Force whose duties may include partnership support, the provision of contractual services, or community volunteer support.
4. It is an accepted consequence that the demands of the PUP, specifically during 2022 and the first half of 2023, resulted in increased delays in the completion of new vetting applications for all areas of non-batch recruitment. Such delays were mirrored nationally across all police FVUs and, during this period, the GMP FVU frequently operated at or in excess of three weeks outside its key performance indicator of eight weeks to complete non-batch vetting clearances.
5. The tables below detail the recovery that has been achieved by the FVU during 2024 to reduce the time taken to complete all new non-batch recruitment vetting applications. Data as of 30th June 2024 includes new applications for non-police personnel (NPPV) and GMP employed police personnel (GMPV), both in terms of the volume of clearances waiting to be completed and the number of weeks the completion is outstanding.



4.3 Refusals

1. Naturally, with an effective regime, not all applications will result in vetting clearance being granted and refusals will necessarily follow where individuals are assessed as a security risk. The tables below, show the percentage of successful vetting applications for police officers, the Special Constabulary and police staff processed by the FVU for the calendar year 2023.
2. In respect of police officers and Special Constabulary, 14% of candidates (162 individuals) were refused vetting clearance at the point their applications were initially processed. Of those individuals, 55% appealed (89 individuals) and of those, 97% were unsuccessful in securing vetting clearance (87 individuals). In total, taking the appeal procedure into consideration, 14% of police officer applicants (160 individuals) were refused vetting clearance.

3. The 14% refusal rate set out at point 2 above, is double that of the previous year and is evidence of how the FVU has responded to the operational inspection of the unit by HMICFRS in January 2023, and taken onboard the conclusions reached in respect of that review. This includes exercising reduced tolerance to accepting police officer applicants where adverse information exists, and greater professional rigour and curiosity when considering previous criminal allegations recorded against applicants, where the police investigation has been finalised with no further action being taken against the individual.

Police Officers and Special Constabulary								
Gender	Total	Percentage	Successful 1st Application	Appealed	Appeal Unsuccessful	Appeal Successful	Total Successful	Percentage
Male	690	59%	577	61	59	2	579	84%
Female	481	41%	432	28	28	0	432	90%
Total	1171	100%	1009	89	87	2	1011	86%
Ethnicity	Total	Percentage	Successful	Appealed	Appeal Unsuccessful	Appeal Successful	Total Successful	Percentage
White	967	84%	867	20	66	2	869	88%
BAME	169	14%	130	68	20	0	130	77%
Not disclosed	15	2%	12	1	1	0	12	80%
Total	1171	100%	1009	89	87	2	1011	86%

Granting and refusal of vetting clearance for police officers and Special Constabulary

4. In respect of police staff applicants, 10% of candidates (72 individuals) were refused vetting clearance at the point their applications were initially processed. Of those individuals, 37% appealed (27 individuals) and of those, 93% were unsuccessful in securing vetting clearance (25 individuals). In total, taking the appeal procedure into consideration, 10% of police staff applicants (70 individuals) were refused vetting clearance.

Police Staff								
Gender	Total	Percentage	Successful 1st Application	Appealed	Appeal Unsuccessful	Appeal Successful	Total Successful	Percentage
Male	279	39%	246	13	12	1	247	89%
Female	445	61%	406	14	13	1	407	91%
Total	724	100%	652	27	25	2	654	50%
Ethnicity	Total	Percentage	Successful	Appealed	Appeal Unsuccessful	Appeal Successful	Total Successful	Percentage
White	587	81%	537	20	18	2	539	92%
BAME	133	18%	112	7	7	0	112	84%
Not disclosed	4	1%	3	0	0	0	3	75%
Total	724	100%	652	27	25	2	654	90%

Granting and refusal of vetting clearance for police staff

- The increased robust approach taken by the FVU to all decision making seeks to prevent those who commit sexually motivated crimes against woman and those unsuitable for policing from joining the policing profession. The consequential effect of this is that a greater number of applicants must necessarily be vetted to achieve the recruitment requirement.

4.4 Workforce Police National Database check

- On 18th January 2023, the Home Office announced that all forces must check their workforce against national databases to identify if anyone had 'slipped through the net'. That essentially meant that forces needed to provide assurance, by checking their workforce against national databases, to satisfy themselves that where police officers, staff and volunteers have been convicted of a criminal offence and / or have been otherwise indexed to adverse information, for example as a suspect, both an appropriate vetting security clearance decision has been made and proper criminal and / or disciplinary investigations have been undertaken.
- In response to the announcement by the Home Office, a decision was taken by the NPCC that all police officers, staff and volunteers in England and Wales would be checked against the PND to identify any intelligence or allegations that needed further investigation. The PND includes information from custody records, crime records, intelligence records, domestic and child abuse records and known criminal entity records (e.g., organised crime groups (OCGs), county lines investigations and modern slavery investigations).
- On 14th February 2023, GMP supplied its entire applicable workforce data, which consisted of 13,087 records, to the PND service provider. That data was subsequently

washed through all PND records and returned to GMP for analysis and investigation. Over a six-month period, a dedicated team was assigned to work through the data, reassuringly at the conclusion of this, it only resulted in one police officer and one police staff member being subject to disciplinary investigation, in addition to one other employee intervention. A breakdown of results can be seen in the table directly below:

Number of individuals triggering criminal investigation	Number of individuals triggering disciplinary investigation	Number of individuals subject of vetting clearance review	Number of individuals subject of management intervention	Number of individuals subject to no action
0	2	0	1	0

- In addition to this, the Force completed a great deal of work to ensure any other areas of risk were correctly assessed and mitigated. This included where necessary providing police personnel, identified as victims, with the requisite welfare support. On a national level, the NPCC continues to work with the Home Office to establish a sustainable solution to provide continuous integrity screening, to ensure those working in policing are checked against national databases on an ongoing basis, and highlighted at the earliest opportunity.

5 Conclusion Summary

- This report shows that the performance of the FVU continues to improve both in terms of timeliness and quality and, whilst finely balanced in terms of its lean establishment, the FVU has sufficient capacity to efficiently meet demand; it has a capable workforce that can deliver an effective vetting regime for GMP.
- From a Force HMICFRS self-assessment governance perspective, of the nine recommendations applicable to forces (as opposed to national policing bodies), GMP is presently reporting eight recommendations have been met, whilst the remaining ninth cannot be met as this is wholly reliant on a continuous integrity monitoring solution that is yet to be delivered through the NPCC Crime Prevention Portfolio. The direction from the NPCC is that all forces should grade this ninth recommendation as not being met whilst ever the national capability remains undelivered.
- Of the two areas for improvement (AFIs), one has already been achieved, whilst the other will not be met by the deadline because a commercial software provider solution needs to provide a resolution. That is an issue common to nearly every force and is such is a matter on which the NPCC Vetting Portfolio on behalf of policing nationally is progressing.