



THE POLICE, FIRE AND CRIME COMMISSIONER FOR  
NORTH YORKSHIRE AND THE CHIEF CONSTABLE OF  
NORTH YORKSHIRE

**Vetting**

**FINAL**

**Internal audit report: 1.19/20**

**11 June 2019**

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# 1 EXECUTIVE SUMMARY

## 1.1 Background

As part of the approved internal audit plan for 2019/2020, we have undertaken a review of the process surrounding vetting and considered the following checks performed:

1. Management Vetting (MV)
2. Recruitment Vetting (RV)
3. Non-Police Personnel Vetting (NPPV)
  - a. Level 1
  - b. Level 2 (Abbreviated)
  - c. Level 2 (Full)
  - d. Level 3

National guidance regarding vetting was issued by the College of Policing in October 2017 and is publicly available online. Under section 1.2 of the Vetting Code of Practice, the need for is explained as:

*“It is essential that the public is confident that police vetting processes are effective in identifying those who pose a potential risk to others or who are otherwise unsuitable for working within the police service.”*

At the force, a software platform is used to track vetting of applicants and ongoing health checks. Implemented in 2010, the system captures when checks are performed, checks for related individuals, stores documents used through testing and captures the final authorisation by the Vetting Manager.

The Vetting team currently consists of eight members of staff who are based at the Northallerton office: five researchers, two administrators and one Vetting Manager. Performance regarding adherence with the defined Service Level Agreement (SLA) of 37.5 days to complete all vetting applications is reported on a monthly basis within Police Standards Department (PSD) performance report.

## 1.2 Conclusion

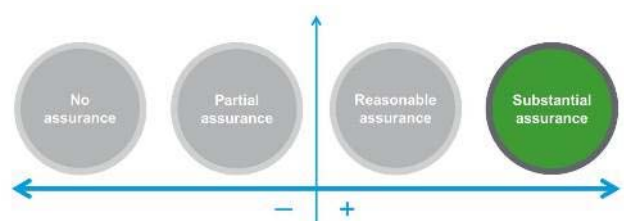
Based upon results of our testing, we believe there are robust processes and procedures in place with regards to management vetting, recruitment vetting and non-police personnel vetting at the organisations that are currently being complied with.

We have agreed **two low** priority management actions with regards to vetting. For more information, please see section two of this report.

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### Internal audit opinion:

Taking account of the issues identified, the Police, Fire and Crime Commissioner for North Yorkshire and the Chief Constable of North Yorkshire can take **substantial assurance** that the controls upon which the organisation relies to manage the identified area are suitably designed, consistently applied and operating effectively.



### 1.3 Key findings

The key findings from this review are as follows:

- We reviewed a sample of 10 new starters which required management vetting level clearance over the prior 12 months. We categorised the minimum checks as per section 6.15 of APP Vetting Guidance and tested each sample for compliance with the checks. For the eight valid samples selected, we noted no discrepancies regarding compliance with the management vetting guidance. The remaining two samples were members of Major Incident Team (MIT) and were already management vetted by Cleveland Police.
- Through discussion with the Vetting Manager, we confirmed there is an audit trail maintained within the vetting system. We understand the log has been active and maintained since the vetting system was first implemented in 2010. We observed the audit trail and obtained a walkthrough sample of all modifications to the vetting system made within the day of testing (24 April 2019).
- Through discussion with the Vetting Manager, we understand a fortnightly tasking meeting occurs between vetting, professional standards, integrity and HR departments. Tasking meetings monitor ongoing investigations regarding conduct of staff / officers. We understand these meetings are minuted, but due to the confidentiality level assigned to these minutes, we did not inspect any documentation for confirmation.
- We obtained a list of all vetting clearance appeals conducted over the past 12 months. From a population of 13, we selected a sample of five appeals: three upheld decisions, two overturned decisions. For all five samples, we confirmed the APP Vetting Guidance had been followed and thoroughly documented within the vetting system.
- We obtained a list of all officers who had transferred to North Yorkshire Police from other constabularies. From a population of 40, we took a sample of five transferees and followed through to documentation held on the vetting system. Of the five, we confirmed that three samples had applied for recruitment vetting (RV) clearance only, whereas the remaining two samples applied for management vetting (MV) clearance. For all five samples, we confirmed vetting checks had been reviewed and approval given by the Vetting Manager. These were documented as case log notes within the vetting system. For all five samples, we confirmed that the vetting level had been granted prior to officers starting at North Yorkshire Police.
- We took a sample of three months from the past 12 months and obtained PSD performance reports for the following months: May 2018, August 2018 and February 2019. For all three samples, we confirmed performance regarding the Service Level Agreement (SLA) was monitored as a standing item under section 23. We confirmed adherence levels of 89%, 78% and 96% for each month respectively.

### 1.4 Additional information to support our conclusion

The following table highlights the number and categories of management actions made. The detailed findings section lists the specific actions agreed with management to implement.

Area	Control design not effective*		Non Compliance with controls*		Agreed actions		
	0	(11)	2	(11)	Low	Medium	High
Vetting	0	(11)	2	(11)	2	0	0
<b>Total</b>					<b>2</b>	<b>0</b>	<b>0</b>

\* Shows the number of controls not adequately designed or not complied with. The number in brackets represents the total number of controls reviewed in this area.

## 2 DETAILED FINDINGS

### Categorisation of internal audit findings

Priority	Definition
Low	There is scope for enhancing control or improving efficiency and quality.
Medium	Timely management attention is necessary. This is an internal control risk management issue that could lead to: Financial losses which could affect the effective function of a department, loss of controls or process being audited or possible regulatory scrutiny/reputational damage, negative publicity in local or regional media.
High	Immediate management attention is necessary. This is a serious internal control or risk management issue that may lead to: Substantial losses, violation of corporate strategies, policies or values, regulatory scrutiny, reputational damage, negative publicity in national or international media or adverse regulatory impact, such as loss of operating licences or material fines.

This report has been prepared by exception. Therefore, we have included in this section, only those areas of weakness in control or examples of lapses in control identified from our testing and not the outcome of all internal audit testing undertaken.

Ref	Control	Adequate control design (yes/no)	Controls complied with (yes/no)	Audit findings and implications	Priority	Action for management
1	Recruitment vetting performed meets the minimum required checks as per listed under point 6.13 of APP Vetting Guidance.	Yes	No	<p>We took a sample of 10 new starters from the prior 12 months which required recruitment vetting.</p> <p>We categorised the Minimum checks as per section 6.13 of APP Vetting Guidance and tested each sample for compliance with the guidance.</p> <p><b><u>Police National Computer (PNC)</u></b> - We confirmed all ten samples had entries on the vetting system confirming a PNC Check had been performed.</p> <p><b><u>Local Intelligence Checks</u></b> - We confirmed all ten samples had entries on the vetting system confirming a silver nominal check had been performed.</p> <p><b><u>Special Branch</u></b> - We confirmed all ten samples had entries on the vetting system confirming a special branch check had been performed.</p> <p><b><u>Police National Database (PND)</u></b> - We confirmed all samples had entries on the vetting system confirming a PND check had been performed.</p>	Low	<p><b><u>Biometric Vetting</u></b></p> <p>The Vetting Manager will import biometric vetting spreadsheet into the vetting system ensuring all pass/fail outcomes are appropriately reflected.</p> <p>The Vetting Manager will ensure all future outcomes regarding biometric vetting are recorded through entry within the vetting system.</p> <p><b><u>Implementation date</u></b></p>

Ref	Control	Adequate control design (yes/no)	Controls complied with (yes/no)	Audit findings and implications	Priority	Action for management
				<p><b>Record Management Check</b> - We confirmed all ten samples had entries on the vetting system confirming Professional Standards Integrity Unit (PSIU) check had been performed.</p> <p><b>Credit Reference Check</b> - We confirmed for all ten samples, a credit check had been made and retained within the vetting system. For each sample, we confirmed a corresponding entry had been made on the vetting system including vetting staff response to the credit report.</p> <p><b>Voters Records</b> - Through inspection of credit reports, we confirmed nine of the sample were registered on the electoral roll. For the remaining one sample, we confirmed the applicant was a foreign national and was therefore not on the electoral register.</p> <p><b>Open Source Enquiries</b> - For all ten samples, we confirmed an entry had been made on the vetting system confirming an internet search had been undertaken by vetting staff.</p> <p><b>Biometric Vetting</b> - We confirmed six of the samples did not require biometric vetting as they are staff members. For one of the sample, we confirmed that the applicant (Police Officer) had been vetted four years prior and when taking on a new role, an RV Health Check was performed.</p> <p>Through discussion with the Vetting Manager, we understand that as the employee had undertaken recruitment vetting in 2014, we understand this was before biometric vetting had become a requirement (2016). For the remaining three samples, we understand that biometric vetting results had been recorded on a spreadsheet, though the vetting system had not been updated to reflect this.</p> <p>If the vetting system is not effectively updated to reflect completion of biometric vetting, including pass/fail outcome, there is a risk of reduced oversight with regards to compliance with APP Vetting Guidance.</p>		<p>31 May 2019</p> <p><b>Responsible Owner</b></p> <p>Vetting Coordinator</p>

Ref	Control	Adequate control design (yes/no)	Controls complied with (yes/no)	Audit findings and implications	Priority	Action for management
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**Applicant Residency** - For nine of the sample, through inspection of electoral register, we had no reason to believe the applicant had been UK resident for fewer than three years.

The one remaining sample was a Polish foreign national. We confirmed the applicant had been UK resident for three and half years through inspection of vetting application form. We further confirmed an ACRO (ACPO Criminal Records Office) report had been received from Central Authority for Poland and attached to the vetting system.

Risk exposure			Root cause		
Biometric vetting may not be accurately recorded on the vetting system, reducing integrity of vetting process.			Biometric vetting has been conducted, though not recorded through the vetting system.		
Probability	Financial	Reputational	Operational	Legal	Rating
Probable	Negligible	Negligible	Minor	Negligible	5:8

2	Confirm that non-police personnel vetting performed meets the minimum required checks as per listed under section 6.22 to 6.25 of APP Vetting Guidance.	Yes	No	<p>APP Vetting Guidance sets out four levels of clearance for non-police personnel vetting (NPPV) and the appropriate checks for each clearance level. We obtained a list of all NPPV undertaken within the last 12 months and conducted a sample test of applicants to confirm that the vetting department are conducting vetting checks in accordance with the APP Vetting Guidance.</p> <p><b>NPPV Level 1</b></p> <p>NPPV Level 1 is for those who require no access to classified material. Five of the 20 samples taken were vetted at NPPV Level 1. Through discussions with the Vetting Manager and from sample testing, we found the following under each check:</p>	Low	<p><b>Identity Verification</b></p> <p>The Vetting Manager will perform a reconciliation of existing NPPV clearances from the previous year to ensure completed identity verification form is in place.</p> <p>Where any forms are missing, retrospective ID verification forms will be</p>
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Ref	Control	Adequate control design (yes/no)	Controls complied with (yes/no)	Audit findings and implications	Priority	Action for management
				<p><u>Police National Computer (PNC)</u></p> <ul style="list-style-type: none"> <li>in all of the five cases, a PNC was completed.</li> </ul> <p><u>Local intelligence and other non-conviction database(s) including Special Branch (SB)</u></p> <ul style="list-style-type: none"> <li>in two of the five cases, a silver nominal check covering the North Yorkshire area was in place;</li> <li>in two of the remaining three cases, the applicants are not from the local area and therefore information is covered in the Police National Database (PND);</li> <li>in the remaining case, there was no evidence of a PND check in place. Discussions with the Vetting Manager confirmed that this was an administration error and the PND section had not been updated on the vetting system; and</li> <li>in all of the five cases, a SB check was in place.</li> </ul>		<p>completed and recorded on the vetting system.</p> <p>If applicable, refresher training of staff will be carried out to reiterate importance of identity verification.</p> <p><b><u>Implementation date</u></b></p> <p>31 May 2019</p> <p><b><u>Responsible Owner</u></b></p> <p>Vetting Coordinator</p>
				<p><u>PND/other force checks</u></p> <p>Through discussions with the Vetting Manager, we confirmed that some forces do not automatically update information to PND. In this instance, a foreign force check should be undertaken.</p> <ul style="list-style-type: none"> <li>in four of the five cases, a PND check was in place;</li> <li>in the remaining case, as stated above, there was no PND in place;</li> <li>in all cases, a foreign force check was not required.</li> </ul>		
				<p><b><u>NPPV Level 2 (abbreviated)</u></b></p> <p>NPPV Level 2 (abbreviated) allows access to police material up to OFFICIAL-SENSITIVE, either on police premises or by remote access. The individual has no system access. Five of the remaining samples were vetted at NPPV Level 2 (abbreviated). We found the following under each check:</p>		



Ref	Control	Adequate control design (yes/no)	Controls complied with (yes/no)	Audit findings and implications	Priority	Action for management
				<p><u>PNC</u></p> <ul style="list-style-type: none"> <li>in all of the five cases, a completed PNC was in place.</li> </ul> <p><u>Local intelligence and SB checks</u></p> <ul style="list-style-type: none"> <li>in one of the five cases, a silver nominal check was in place;</li> <li>in the remaining cases, local intelligence information was covered in the PND; and</li> <li>in all cases, a SB check was in place.</li> </ul> <p><u>PND/other force checks</u></p> <ul style="list-style-type: none"> <li>in all of the five cases, a PND check was in place; and</li> <li>in one of the five cases, a further foreign force check was undertaken.</li> </ul> <p><b><u>NPPV Level 2 (full)</u></b></p> <p>NPPV Level 2 (full) allows access to classified police material or information up to OFFICIAL-SENSITIVE with occasional access to SECRET. Five of the remaining cases were vetted at NPPV Level 2 (full). We found the following under each check:</p> <p><u>PNC</u></p> <ul style="list-style-type: none"> <li>in all of the five cases, a completed PNC was in place.</li> </ul> <p><u>Local intelligence and SB checks</u></p> <ul style="list-style-type: none"> <li>in all of the five cases, a completed silver nominal check was in place; in all of the five cases, a completed SB check was in place;</li> </ul>		

Ref	Control	Adequate control design (yes/no)	Controls complied with (yes/no)	Audit findings and implications	Priority	Action for management
				<p><u>PND/other force checks</u></p> <ul style="list-style-type: none"> <li>in all of the five cases, a PND check was in place; and</li> <li>in three of the five cases, a further foreign force check was undertaken;</li> </ul> <p><u>Professional standards check</u></p> <ul style="list-style-type: none"> <li>in three of the five cases, a completed Professional Standards Integrity Unit (PSIU) check was in place; and</li> <li>in the remaining two cases, there was no evidence of a PSIU check. Discussions with the Vetting Manager confirmed that the missing PSIU checks were due to administrative errors.</li> </ul> <p><u>Credit reference checks</u></p> <ul style="list-style-type: none"> <li>in all of the five cases, a credit reference check was in place.</li> </ul> <p><b><u>NPPV Level 3</u></b></p> <p>NPPV Level 3 allows access to classified police material or information up to SECRET and occasional access to TOP SECRET. The clearance level is comparable to management vetting (MV). The remaining five cases were all vetted at NPPV Level 3. We found the following under each check:</p> <p><u>Checks as required for Level 2 (full) clearance</u></p> <ul style="list-style-type: none"> <li>all of the five cases were vetted with the appropriate checks as stated under Level 2 (full) clearance.</li> </ul> <p><u>Professional standards check</u></p> <ul style="list-style-type: none"> <li>in all of the five cases, there was evidence of a PSIU check in place;</li> </ul> <p><u>Full financial checks</u></p> <ul style="list-style-type: none"> <li>in four of the five cases, a fully completed vetting form was in place detailing applicant's full financial history;</li> </ul>		

Ref	Control	Adequate control design (yes/no)	Controls complied with (yes/no)	Audit findings and implications	Priority	Action for management
				<ul style="list-style-type: none"> <li>in the remaining case, there was no vetting form documented on the vetting system meaning no completed financial history form was in place; and</li> <li>in all of the five cases, a full credit check was in place.</li> </ul>		
				<p><u>Regular aftercare</u></p>		
				<ul style="list-style-type: none"> <li>as stated under the minimum checks for NPPV Level 3, regular aftercare must be carried out for clearances. As the sample test was taken from the previous 12 months, we could not test reviews of clearances. However, all of the five NPPV Level 3 clearances have a deadline review date in place for the upcoming 12 months.</li> </ul>		
				<p><b><u>Further comment</u></b></p>		
				<p><u>ID verification</u></p>		
				<p>To confirm the identification of the individual applying for vetting clearance, a vetting identity verification form should be completed by the individual's line manager and two pieces of appropriate identification provided. From the sample test, we found the following:</p>		
				<ul style="list-style-type: none"> <li>in two of the 20 cases, there was no evidence of a completed identity verification form in place and no evidence of appropriate ID. In one of these two cases, the applicant had no ID photo in place at all;</li> <li>in one of the remaining cases, there was no completed identity verification form in place, however appropriate ID was saved in the documents;</li> <li>in two of the remaining cases, although the ID provided was sufficient, the types of ID stated on the identity verification form differed;</li> <li>in one of the remaining cases, an out of date driving license was provided. Evidence of email communication from the vetting department requesting another form of ID was in place, however no response or further ID was seen; and</li> </ul>		

Ref	Control	Adequate control design (yes/no)	Controls complied with (yes/no)	Audit findings and implications	Priority	Action for management
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- in the remaining cases, two forms of appropriate ID were in place and completed ID verification forms.

If there is no record of identification held on file, there is a risk of reduced certainty regarding assurance provided by the vetting process.

Residency

- in 19 of the 20 cases, the applicants confirmed UK residency for the full three-year period;
- in the remaining case, the applicant stated UK residency in initial vetting application, however no dates were recorded on the vetting system to confirm the duration; and
- in all of the 20 cases, there was no need to undertake ACRO checks for any potential foreign convictions.

Military

- in all of the 20 cases, there was no need for military checks.

Counter-Terrorism Checks (CTC)

From discussions with the Vetting Manager, we confirmed that the force do not carry out CTCs on any NPPV applications. Only specific roles would require a CTC in place.

The CTC would be carried out as part of the security check (SC), which is undertaken by an external department.

From the 20 samples taken, there was no SC or CTC in place.

Risk exposure	Root cause
ID may not be correctly verified by vetting staff.	Oversight when ID verification is made by a Vetting Researchers.

Ref	Control	Adequate control design (yes/no)	Controls complied with (yes/no)	Audit findings and implications			Priority	Action for management	
				This may undermine the assurance provided through the vetting process regarding applicant background.					
				<b>Probability</b>	<b>Financial</b>	<b>Reputational</b>	<b>Operational</b>	<b>Legal</b>	<b>Rating</b>
				Probable	Negligible	Negligible	Minor	Negligible	5:8

# APPENDIX A: SCOPE

The scope below is a copy of the original document issued.

## Scope of the review

The scope was planned to provide assurance on the controls and mitigations in place relating to the following area:

### Objectives of the area under review

There is a robust vetting regime in place that is conducted in accordance the APP Vetting Procedure and Vetting Code of Practice.

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When planning the audit, the following areas for consideration and limitations were agreed:

#### Areas for consideration:

A thorough and effective vetting regime is a key component in assessing an individual's integrity and the APP Vetting Procedure and Vetting Code of Practice underpin the vetting process undertaken by the organisations. Our review will consider the process for recruitment vetting (RV), management vetting (MV) and non-policing personnel vetting (NPPV) and in particular:

- We will perform substantive testing to confirm compliance with APP Vetting Procedure for RV, MV and NPPV and in particular:
  - Checkable history;
  - Residency requirements / criteria;
  - Minimum level of clearance is in place dependent on the post;
  - Authentication;
  - An appropriate audit trail is maintained on the vetting system.
- Decision making is made in accordance with the National Decision Model and outcomes are recorded on the vetting system.
- An appeals process is in place and adhered to, this will be confirmed through substantive testing.
- Review of checks performed on transfers and re-joiners.
- Vetting checks are re-performed when required and in accordance with the APP Vetting Procedure. We will consider how the vetting department are informed of changes in circumstances e.g. misconduct hearing.
- Performance against SLA's are reported from the organisations' governance structure.

Our testing will consider force and PFCC's staff.

**Limitations to the scope of the audit assignment:**

- We will not validate the accuracy of the decision made but confirm the rationale has been recorded on the vetting system.
- We will not confirm all staff vetting is in date.
- Our work will not guarantee the outcome of HMICFRS inspection.
- We will not consider the process for national security vetting (NSV).
- As the Police, Fire and Crime Commissioner and deputy do not require vetting this will not form part of our review.
- We will not comment on the appropriateness or outcome of any appeal.
- Testing will be completed on a sample basis, so we will not confirm compliance with all elements of the APP Vetting Procedure.
- We will not review access or the appropriateness of the vetting system.
- Our work does not provide absolute assurance that material errors, loss or fraud do not exist.

## APPENDIX B: FURTHER INFORMATION

### **Persons interviewed during the audit:**

- Vetting Coordinator

### **Documentation reviewed during the audit:**

- Vetting Code of Practice
- Vetting APP
- Recruitment Vetting Template
- Management Vetting Template
- NPPV Level 1 Template
- NPPV Level 2 (Abbreviated) Template
- NPPV Level 2 (Full) Template
- NPPV Level 3 Template



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