



# HM Prison & Probation Service

<b>National Security Framework</b> <b>VETTING FUNCTION -</b> <b>SECURITY VETTING</b>		
<b>National Security Framework</b> <b>VETTING FUNCTION -</b> <b>SECURITY VETTING</b>		<b>Ref: NSF 15.1</b>
<b>This instruction applies to :</b>		<b>Reference:</b>
Prisons HMPPS Headquarters Providers of Probation Services		<b>PSI 07/2014</b> <b>AI 05/2014</b> <b>PI 03/2014</b>
<b>Issue Date</b>	<b>Effective Date</b>	<b>Expiry Date</b>
<b>Revised</b> 26 June 2021	26 June 2021	n/a
<b>Issued on the authority of</b>	HMPPS Operational Policy Sub-Board	
<b>For action by</b>	All staff responsible for the development and publication of policy and instructions <input checked="" type="checkbox"/> HMPPSHQ <input checked="" type="checkbox"/> Probation Service <input checked="" type="checkbox"/> Public Sector Prisons <input checked="" type="checkbox"/> Contracted Prisons* <input checked="" type="checkbox"/> Governors <input checked="" type="checkbox"/> Heads of Groups <input checked="" type="checkbox"/> HMPPS <input checked="" type="checkbox"/> Other Providers of Probation Services <i>* If this box is marked, then in this document the term Governor also applies to Directors of Contracted Prisons</i>	
<b>Instruction type</b>	Service improvement	
<b>For information</b>	All HQ and Prison and Probation staff and employees of Probation services providers.	
<b>Provide a summary of the policy aim and the reason for its development/ revision</b>	This PSI provides an explanation of the policy and procedures that must be followed for the security vetting of all staff and workers (both directly and non-directly employed).  <b>26<sup>th</sup> June 2021</b> - With effect from 26 June 2021 all Community Rehabilitation Company (CRC) contracts will be terminated, with the responsibility for all offender management activity transferring to the Probation Service. The revisions to this policy introduces new language and terminology, removes reference to CRCs, but does not change the practice set out in the mandatory actions.	
<b>Contact</b>	<a href="mailto:SOCT.Procedures@justice.gov.uk">SOCT.Procedures@justice.gov.uk</a>	
<b>Associated documents</b>	<a href="#">PSI 2014/27 - AI 20/2014 - PI 23/2014 - Security Vetting - Additional Risk Criteria for Ex-Offenders Working in Prison &amp; Community Settings</a> <a href="#">PSI 42/2014 Exclusion of Personnel on Grounds of Misconduct</a>	

	<a href="#">PSI 39/2014 - PI 55/2014 - AI 26/2014 Security Vetting - Offenders as Mentors</a> <a href="#">PSI 27/2014, PI 23/2014 Additional Risk Assessment for Ex-Offenders in Prison &amp; Community Settings</a> <a href="#">Information Sharing Policy Framework</a>
<b>Replaces the following documents which are hereby cancelled:</b> PSI 43/2010	
<p><b>Audit/monitoring:</b> The Director of the Probation Service in England, Director of HMPPS in Wales and HMPPS Director of Rehabilitation Services for Probation services providers will monitor compliance with the mandatory requirements in this instruction.</p> <p>HMPPS contract management will hold providers to account for delivery of mandated instructions as required in the contract.</p> <p>HMPPS Deputy Directors of Custody and Controllers, will monitor compliance with the mandatory actions set out in this Instruction.</p>	
<p><b>Notes: <i>All Mandatory Actions throughout this instruction are in italics and must be strictly adhered to.</i></b></p> <p><b>Updates 02/06/2014 –</b> This instruction has been revised with minor typographical changes in addition to the following, paragraph 4.12 and 4.14 - changes to “examples include” rather than “for example change of name, address etc”; paragraph 5.1 - Probation Service added to first table Probation Service staff in HQ and Regions; paragraph 11.3 - Updated Government classification system and PSI reference; paragraph 11.4 and 11.5 - combined into 11.4; and Paragraph 12.1 - Amended to refer to HMPPS rather than particular parts of it.</p>	

## Contents

Hold down “Ctrl” and click on section titles below to follow the link.

SECTION	SUBJECT	Reference by
1	<a href="#"><u>Executive summary</u></a>	
2	<a href="#"><u>Purpose</u></a>	
3	<a href="#"><u>Risk Assessment</u></a>	
4	<a href="#"><u>Identifying Security Vetting Levels</u></a>	
5	<a href="#"><u>Mandatory Vetting Levels</u></a>	
6	<a href="#"><u>HMPPS Headquarters Groups</u></a>	
7	<a href="#"><u>Security Vetting Renewals And Changes In Vetting</u></a>	
8	<a href="#"><u>Security Vetting Movements</u></a>	
9	<a href="#"><u>Ongoing Responsibilities Review &amp;Aftercare</u></a>	
10	<a href="#"><u>Monitoring &amp; Quality Assurance</u></a>	All staff and workers
11	<a href="#"><u>Information Assurance in Vetting</u></a>	
12	<a href="#"><u>Legal Compliance</u></a>	
Annex A	<a href="#"><u>Security Vetting Expiry Table</u></a>	
Annex B	<a href="#"><u>Vetting Roles and Responsibilities</u></a>	
Annex C	<a href="#"><u>Vetting Checklist</u></a>	
Annex D	<a href="#"><u>Racist Group Policy</u></a>	
Annex E	<a href="#"><u>Racist Group Policy NDE Workers</u></a>	
Annex F	<a href="#"><u>Change of Circumstances Notification</u></a>	

## 1. **EXECUTIVE SUMMARY**

### Background

- 1.1. *This instruction contains core policy principles relating to personnel security vetting checks that must be conducted on all directly and non-directly employed people working in HMPPS both within prisons and in the community including:*
  - *Headquarters including the Probation Service*
  - *Public and private prisons*
  - *Escort contractors*
  - *Electronic monitoring contractors*
  - *Attendance centres (hybrid and senior but not junior locations) and approved premises*
  - *All other HMPPS service providers*
- 1.2. Associated instructions 42/2014 Exclusion of Personnel on Grounds of Misconduct and PSI 27/2014 – PI 23/.2014 Additional Risk Criteria for Ex-Offenders should be read in conjunction with this PSI to obtain a comprehensive picture of the vetting framework.
- 1.3. *Service providers must have a security vetting policy that matches and complies with the requirements laid down in this document..*
- 1.4. This policy instruction is also supported by the [My Hub](#) intranet and MoJ external website, both of which provide a comprehensive information source for vetting procedures, as well as offering professional advice and guidance.

### Desired Outcomes

- Ensure compliance with the Cabinet Office Baseline Personnel Security Standard (BPSS) which is the minimum security vetting requirement across Government.
- To provide a policy framework which ensures the organisation complies with relevant legislation and ensures all staff and non-directly employed workers undergo consistent personnel security vetting checks.
- To ensure all HMPPS staff, workers and applicants are consistently and rigorously screened at appointment and where necessary on renewal.
- To make HQ, prisons regions and Probation Service regions together with service providers accountable in the delivery of security vetting checks and prevent unsuitable applicants from working for the organisation.
- To ensure all security screening checks are carried out in line with the process and guidance materials contained within this instruction and on the My Hub intranet and MoJ external website.

### Mandatory Actions

- 1.6 *All actions in this instruction are mandatory unless specified otherwise. Governors/Directors, Heads of Group, Regional Probation Directors for in England and Wales, HMPPS Director of Probation services providers, Deputy Directors, must ensure that*

*all relevant staff are aware of the mandatory actions required and that the policy is implemented and adhered to.*

- 1.7 *HMPPS contract management will hold providers to account for delivery of mandated instructions as required in the contracts.*

Resource Implications

- 1.8 Whilst HMPPS HQ, prison and probation business locations will already have in place arrangements to manage the vetting process through their Vetting Contact Point (VCP). The Large service providers will need to ensure sufficient VCPs are in place to take responsibility for managing the security vetting on behalf of their staff and workers.

(Signed)

**Kevin Reilly/ Peter Greenhill, Joint-Chairs of OPS**

## **SECTION 2 – PURPOSE**

### **WHY SECURITY VETTING CHECKS ARE REQUIRED**

- 2.1 To validate the identity of applicants is genuine and they have a lawful entitlement to work in the United Kingdom.
- 2.2 To avoid security breaches and ensure applicants, serving staff and workers are confirmed as being who they say they are, do not pose a threat to security and will not discredit the Service.
- 2.3 To assure the integrity of the organisation and safety of staff, workers, supervised individuals and visitors.
- 2.4 To provide ongoing assurance periodically through security vetting renewals, once a security vetting level expires. These checks will require staff and workers to complete new documentation, declaring any changes in circumstances.
  - *All security screening checks must be carried out in compliance with the process and guidance materials contained on the “My Hub” intranet or those outlined in the Ministry of Justice website which provides access to the relevant policies.*

Vetting checks are not required on ad-hoc visitors who visit a prison on an occasional basis provided that they are escorted at all times by a member of staff. *However, the Governor or equivalent will maintain ultimate authority in relation to decisions made concerning individual's, their level of access to the prison and where the visits are more frequent, if normal security vetting checks are merited. Such cases must be judged on their merits.*

### **PERSONNEL SECURITY CHECKS**

- 2.6 Personnel security checks consist of:
  - Confirming an applicant's identity
  - Verification of current address and address history
  - Confirming an applicant's nationality and entitlement to work in the United Kingdom
  - A criminal records check
  - Obtaining employment reference(s)
  - Personal countersignatory reference
  - Checking qualifications/Professional Registration where specified in the job role.
  - A check against the A residency compliance check for National Security Vetting applications
  - Checks against the Individual Insolvency Register (IIR)
  - Previous HMPPS engagement including any exclusion

- A declaration that individuals working for HMPPS HQ, public and private prisons including service providers are not members of racist groups or organisations.

2.7 Separately and based on risk, those working with children aged under 18 years as well as all specifically healthcare professionals, may be subject to a Disclosure and Barring Service check (formerly Criminal Record Bureau) at the appropriate level.

### Who needs Personnel Security Checks

- 2.8 Mandatory security vetting levels apply to all directly employed staff in HMPPS the Probation Service as well as contractor personnel (termed non-directly employed workers), will be subject to vetting checks appropriate to the job role and level of risk.
- 2.9 Non-directly employed workers are any those working for a HMPPS service provider and include:
- General Contractors (catering, healthcare, maintenance and care etc)
  - Consultants
  - Agency
  - Sessionals
  - Fee Paid Workers
  - Voluntary Workers
  - Locums
- 2.10 The level and nature of vetting checks for non-directly employed workers will be determined firstly by use of the mandated vetting requirements table at Section 5. Where the job role is not specified in the table, a local risk assessment of their role within a HQ, prison or probation location must be applied. This will depend on the level of direct prisoner contact.
- 2.11 *All individual's subject to security vetting and vetting renewal must declare all criminal offences, cautions, reprimands and fixed penalties in line with the exceptions under the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (as amended) and in line with criminal record filtering arrangements.* For applicants, non-disclosure of offences is likely to lead to their application being refused with no leave to re-apply for 12 months. Further information on the criminal record filtering arrangements can be found [Here](#)

### Other Government Department Staff Entry to Prisons

- 2.12 In some circumstances the police and other law enforcement bodies may be required as part of their duties to work in prison establishments. Both the police and Home Office Border Force are cleared to an equivalent or higher level than HMPPS personnel. All Immigration Enforcement staff are subject to a minimum National Security Vetting level at Counter Terrorist Check (CTC) level and the police to the equivalent of National Security Vetting at Counter Terrorist Check (CTC) or higher. On presentation of identity documentation criminal justice agency personnel do not normally require any further checks. Where this work is of a more permanent nature, it will be appropriate for the individuals to be logged on the HMPPS system, through the abridged other government department (OGD) procedure.

## **NATIONAL SECURITY CLEARANCE**

- 2.14 National Security Vetting (NSV) will be required for posts in the High Security Estate and for more sensitive posts, dependent upon mandatory vetting requirements. A national security vetting matrix includes codes for each job role that has been logged as requiring NSV. There are three levels of National Security Vetting dependent on the nature of the job role: Counter-Terrorist Check (CTC), Security Check (SC) and Developed Vetting (DV).
- 2.15 Responsibility for undertaking national security vetting is processed by Shared Services Connected Limited (SSCL), but more complex cases will continue to be dealt with by MoJ Group Security, Delivery and Governance who act as the conduit for contact with the National Security Vetting Cluster 2. The address is:

Group Security, Delivery and Governance  
 Security, Privacy And Live Service/Justice Digital & Technology  
 Piccadilly Exchange, First Floor, 2 Piccadilly Plaza, Manchester, M1 4AH

### **Section 2 Summary**

1. Security vetting is pivotal in confirming the identity of applicants, nationality and UK work entitlement.
2. Security checks confirm a range of basic screening checks to ensure people are who they say they are and do not pose a threat to the organisation, staff or prisoners
3. *All staff and non-directly employed workers must undergo security vetting checks.*
4. After checking mandated vetting levels and/or a risk assessment, some people will require additional vetting checks including Disclosure and Barring Service (DBS) checks and National Security Vetting .
5. The National Security Vetting matrix is specifically for use in cases where National Security Vetting is required.

## SECTION 3 – RISK ASSESSMENT

3.1 In order to assess vetting requirements for staff and non-directly employed workers in posts other than those that have a mandatory vetting level ([see paragraph 5.1](#)) a risk assessment must be undertaken to determine the appropriate level of security vetting checks required. The National Security Risk Matrix lists posts that have been identified as requiring national security vetting. Further information on the matrix can be accessed on the MoJ intranet. If national security vetting is required for a post that is not currently detailed in the National Security Vetting Matrix, the National Security Vetting Assessment of Need form should be completed and sent to MoJ Group Security for consideration.

### How do I do this?

- 3.2 For NSV posts by using the National Security Vetting Assessment of Need form should be completed and sent to MoJ Group Security. They will ask you a series of questions about the post you are assessing. Further guidance on completing the form can be obtained by contacting MoJ Group Security at [MoJGroupSecurity@justice.gov.uk](mailto:MoJGroupSecurity@justice.gov.uk).
- 3.3 In prisons if you have an existing risk assessment process in place which fulfils quality control, audit requirements and is clearly defined as part of your Local Security Strategy (LSS), then you can choose to continue to apply this process to augment any central tools.

### Probation Services staff

- 3.4 Probation Service staff are subject to the same vetting checks and requirements as other HMPPS personnel depending on the job role and level or risk. Where Probation Service staff apply to move to other HMPPS HQ and prison locations they will be subject to a full security vetting check. If Probation Service staff move to another role within the Probation Service, vetting will only be required if they are subject to a higher level of vetting for the post. This is to capture a complete vetting record centrally and provide corporate assurance to the business around the flexible deployment of staff ensuring up to date security vetting is in place. This will include checks on spent as well as unspent criminal convictions under the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (as amended). This will be a minimum level of Enhanced Check 2, but may be higher dependent on the level of risk and type of work undertaken.

### Non-directly employed workers

*The Governor/Director, Heads of Group and senior manager for Probation services providers will delegate responsibility for undertaking a Risk Assessment to a suitable competent manager. The manager will be responsible for undertaking the Risk Assessment to determine the appropriate vetting level for non-directly employed workers if a mandated vetting level is not specified. The default level for non-directly employed workers is Enhanced Level 1. The Risk Assessment Tool is available on My Hub intranet and MoJ part of the Gov.uk website.*

3.5	Section 3 Summary – Risk Assessment
	<ol style="list-style-type: none"> <li>1. All Security Vetting must commence by checking the mandated vetting levels or where not a specified job role, undertake a risk assessment.</li> <li>2. The Risk Assessment Tool has been developed to streamline and assist in decision making and is available on My Hub intranet and MoJ part of the Gov.uk website.</li> <li>3. For NSV there is an Assessment of Need form available from MoJ Group Security at <a href="mailto:MoJGroupSecurity@justice.gov.uk">MoJGroupSecurity@justice.gov.uk</a> where the post is new or not an established job role.</li> <li>4. The Risk Assessment Tool will be accepted as part of your audit assurance processes.</li> </ol>

## **SECTION 4 – IDENTIFYING PRE APPOINTMENT SECURITY VETTING LEVELS**

- 4.1 All job roles within HMPPS are subject to minimum mandatory security vetting as referred to in [Section 5](#) Mandatory Vetting Levels. Where the vetting level is not specified, managers should use the Risk Assessment Tool (RAT) on My Hub, but this will be the exception as most job roles fall within particular categories. *Any proposal to request vetting levels higher than indicated by the tool must be reviewed by an appropriate manager and a decision and rationale provided to the Vetting Contact Point (VCP) to forward to SSCL along with the application.* Exceptionally, this should be referred to the Approvals and Compliance team at [recruitment-decisions@justice.gov.uk](mailto:recruitment-decisions@justice.gov.uk). Further information on the interaction of this team with the MoJ Shared Services Vetting team and Vetting Policy is explained in [Annex B](#) Vetting Roles and Responsibilities.
- 4.2 The Risk Assessment Tool determines the appropriate security vetting level by assessing each role against the policy criteria below in the absence of clarity on the Mandatory Vetting Levels table. Its use will be very limited as most job roles fall into particular vetting categories. Additionally the Assessment of Need form also identifies when a National Security Vetting check is required for new posts that are not registered on the National Security Vetting Risk Matrix. If the RAT determines that National Security Vetting is required, the Assessment of Need form should be completed in line with the National Security Vetting application.
- 4.3 Once the appropriate level of security vetting checks have been identified and agreed, the Vetting Contact Point will need to undertake a face to face identity check and clarify the individual's right to work in the UK. Once satisfied the VCP will submit a vetting clearance request form to SSCL to initiate vetting and for an encrypted link to be sent for the relevant vetting questionnaires. *The relevant vetting questionnaire and verified ID documents must then be forwarded to SSCL to carry out the necessary checks.* They will confirm that a candidate has passed or been declined as an outcome of the vetting process. Information on how to do this is available on the My Hub intranet.

### **Baseline Personnel Security Standard (BPSS)**

- 4.4 Some Probation Service job roles where the person is providing administrative support and without supervised individual contact will require this vetting level only. This is because some posts fall outside the scope of the 1974 (*Exceptions*) Order 1975 (*as amended*) The BPSS comprises:
- Identity checks
  - Right to work checks
  - Employment reference(s)
  - Criminal records check (unspent convictions)

### **Standard Check**

- 4.5 *This security vetting check is only applicable to non-directly employed workers in prison establishments; the Risk Assessment tool must be used in all cases to confirm that a higher level of check is not necessary in individual cases.* The Standard Check is intended for contractors working in a prison for a limited period of time without the necessity for full referencing as the risk is controlled. It consists of:
- An identity check;
  - Address history
  - Confirmation of entitlement to work in the United Kingdom through Home Office Borders Agency/Immigration enforcement

- A criminal records check including spent and unspent convictions

### Enhanced Check 1 and 2

4.6 These are the minimum baseline requirements for all directly employed staff and most workers in the HMPPS staff. This differs from the BPSS as it checks both spent and unspent criminal records in line with the criminal record filtering rules. The Enhanced Check has been split into Enhanced Check 1 and 2 for data analysis purposes:

- Level 1 is for Non-directly employed (NDE) without any form of National Security Clearance.
- Level 2 is for all directly employed staff and those Non-directly employed personnel whose post requires them to have a National Security Vetting.

### Enhanced Check Level 1

4.7 This is undertaken on non-directly employed workers providing services to any HMPPS public or private organisations with prisoner contact and issued keys and where a risk assessment identifies no further vetting is required

### Enhanced Check Level 2

4.8 This is the minimum mandated vetting level for all HMPPS directly employed staff and also the level required for NDE workers subject to national security vetting.

This vetting level exceeds the Cabinet Office Baseline Personnel Security Standard and consists of:

- An identity check;
- *Proof of address*
- Confirmation of an applicant's nationality and entitlement to work in the United Kingdom;
- A criminal records check including spent and unspent convictions.
- Employment references (directly employed posts unless non-directly employed workers are subject to National Security Vetting checks);
- A personal reference provided by a counter-signatory.
- A check against the Exclusion List (the corporate memory of those excluded from HMPPS for a specified period of time).
- *On line healthcare assessment (where appropriate)*
- *A professional registration check (where required)*

*Although not a Personnel Security Vetting check the following declaration must be completed by all staff and non-directly employed workers at Enhanced level*

- *A signed declaration that the applicant is not a member of racist groups or organisations.*
- Other security vetting checks may be required dependent on the job role including:
- *A Disclosure and Barring Service check (Formerly Criminal Records Bureau (CRB)) for those working with children aged under 18 years and healthcare professionals anywhere within the adult estate;*
  - *Checking qualifications/Professional Registration where specified in the job advertisement.*

## Disclosure and Barring Service Check

In addition to minimum vetting levels based on risk and job role, applicants will be subject to Disclosure and Barring Service (DBS) checks. There are three levels:

- Standard DBS check,
- Enhanced DBS check
- Enhanced DBS with children's and/or adults barred list check(s). *To be eligible to request a check of the children's or adult's barred lists, the position must be eligible for an enhanced level DBS check as above and be specifically listed in the Police Act 1997 (Criminal Records) Regulations as able to check the barred list(s).*

## National Security Clearance

- 4.9 National Security Vetting is designed to screen out people who may pose a threat to national security. In addition to the Enhanced Check, National Security Vetting (NSV) may be required for more sensitive posts. There are three levels of National Security Vetting dependent on the nature of the job role: Counter-Terrorist Check (CTC), Security Check (SC) and Developed Vetting (DV). NSV is managed electronically via an encrypted online system through United Kingdom Security Vetting (UKSV), which SSCL co-ordinate for HMPPS and MoJ. Once it is confirmed that NSV is required, an encrypted link will be sent to the individual to complete the on-line Security Questionnaire. If the on-line Security Questionnaire is not completed within 15 working days, the application will be closed down and a new VQ4.0 form will need to be submitted to MoJ Shared Services in order to re-initiate the individual's registration on the UKSV system. Further procedural details can be located on My Hub. Please see Section 4 for mandatory National Security Vetting Levels.

## Counter Terrorist Check (CTC)

- 4.10 CTC clearance is required for all staff and workers in the High Security Estate as well as other specific roles including both directly employed chaplains, sessional chaplains and some chaplaincy workers. The purpose of such checks is to prevent those who may have connections with terrorist organisations, or who may be vulnerable to pressure from such organisations, from gaining access to certain posts, and in some circumstances, premises, where there is a risk that they could exploit that position to further the aims of a terrorist organisation. Other personnel in HMPPS Headquarters or regional offices may also require CTC clearance where individuals are to be employed in posts which:
- involve proximity to public figures who are assessed to be at particular risk from terrorist attack
  - enable access to premises, information or material assessed to be of value to terrorists;
  - involve unescorted access to certain military, civil, industrial and commercial establishments assessed to be at risk from terrorist attack;
  - involve contact with terrorist prisoners or access to information or material assessed to be of significant value to terrorists.

CTC clearance alone does not allow an individual access to, or knowledge or custody of, protectively marked assets. However, within the HMPPS, CTC clearance is always underpinned by an Enhanced Check which does give such access (see above).

Since 2 April 2014 the six tier Government Security Classifications are – Official, Secret and Top Secret. Further information can be found [here](#)

## Security Check (SC)

4.11 SC clearance is required for those individuals who are to be employed in posts which:

- require individuals to have long-term, frequent and uncontrolled access to **secret** assets;
- require individuals to have occasional, supervised access to **top secret** assets;

also for individuals who:

- while not in such posts, will be in a position to directly or indirectly bring about the same degree of damage;
- will have sufficient knowledge to obtain a comprehensive picture of a secret plan, policy or project;
- are being considered for employment where it would not be possible to make reasonable career progress without security clearance for access to secret assets;
- need access to certain levels of protectively marked material originating from another country or international organisation.

For a small number of posts with particular sensitivity or who have access to sensitive intelligence from other criminal justice agencies, an additional 'Enhanced' SC level may also be appropriate.

SC clearance should not usually be required for:

- occasional access to **secret** assets in the normal course of business or during conferences or courses;
- custody of a small quantity of **secret** assets;
- entry to an area where **secret** assets are stored;
- work in areas where **secret** or **top secret** information might be overheard;
- use of equipment capable of handling secret information, provided that access controls are in place.

In the above circumstances, an Enhanced Check should usually be sufficient.

## Change of Circumstances

4.12 *Individuals with SC clearance are subject to an annual review and must notify Corporate Security and Business Continuity Branch of any changes in circumstances since the vetting was initially completed using the following mailbox [MoJGroupSecurity@justice.gov.uk](mailto:MoJGroupSecurity@justice.gov.uk) Examples include change of name, address, divorce, marriage etc as well as ensuring the vetting level is still required.*

## Developed Vetting (DV)

4.13 A requirement for DV clearance is rare in HMPPS. This level of clearance is required for those individuals who are to be employed in posts which:

- require individuals to have long-term, frequent and uncontrolled access to top secret assess;

also for individuals who:

- while not in such posts, will be in a position to, directly or indirectly, bring about the same degree of damage;
- need access to certain levels of protectively marked material originating from another country or international organisation;

DV clearance should not usually be required for:

- occasional, supervised access to limited quantities of **top secret** assets in the normal course of business or during conferences or courses;
- custody of a small quantity of **top secret** assets;
- entry to areas where **top secret** assets are stored;
- work in areas where **top secret** information might be overheard;
- use of equipment capable of handling **top secret** information, provided that access controls are in place.

In the above circumstances, SC clearance should be sufficient.

### Change of Circumstances

- 4.14 *Those subject to DV are also subject to an annual review, ensuring they must notify any changes in circumstances since the vetting was initially completed to Corporate Security and Business Continuity Branch using the following mailbox [MoJGroupSecurity@justice.gov.uk](mailto:MoJGroupSecurity@justice.gov.uk). Examples include change of name, address, divorce, marriage etc, as well as ensuring the vetting level is still required.*

### **Standard Plus (Prison)**

- 4.15 Standard Plus is only for ex-offenders and supervised individuals serving their sentence, whether in custody, on a community or suspended sentence order; or on a licence post release from custody. This will be considered if they have not been successful through the usual standard security vetting procedures because of their previous offending history and they have been nominated for it. *It is limited to a specific prison and must be reviewed annually.* The procedure and qualification criteria for Standard Plus is outlined in [PSI 27/2014 - PI 23/2014 - AI 20/2014 Security Vetting – Additional Risk Criteria for Ex-Offenders Working in Prison and Community Settings](#)

### **Standard Plus (Community)**

- 4.16 Standard Plus has been extended to include ex-offenders in the community working on and providing probation services as well as supervised individuals serving their sentence, whether in custody, on a community or suspended sentence order; or on a licence post release from custody. Vetting requirements are outlined in [Section 5](#) Mandatory Vetting Levels. *A decision on the suitability of an ex-offenders and supervised individuals on a licence post release to work on probation services will be subject to the same considerations as all other vetting cases and must be signed for approval in each case by a senior manager within the Probation Service.* In this way direct accountability is ensured. The procedure and qualification criteria for Standard Plus is outlined in [PSI 27/2014 - PI 23/2014 - AI 20/2014 Security Vetting – Additional Risk Criteria for Ex-Offenders Working in Prison and Community Settings](#)

### **Other Criminal Justice Organisation Vetting Checks**

- 4.17 Some HMPPS staff including Probation Service frontline staff will be asked to complete a separate security vetting level by the police in order to access ViSOR – the confidential

national database that supports Multi Agency Public Protection Arrangements (MAPPA). Prison establishments and the National Probation Service use ViSOR in their management of specific MAPPA supervised individuals. (see [PSI 06/2013 Mandatory Use of ViSOR](#))

- 4.18 Separately some HMPPS staff in prisons will also require police vetting at Non Police Personnel Vetting (NPPV) level 2 and a few at level 3 where accessing the Police National Computer (PNC) as part of their duties.
- 4.19 The National Police Chiefs Council (NPCC) formerly ACPO has updated their vetting policy mandating Non Police Personnel Vetting (NPPV) level 2 or 3 for ViSOR users. HMPPS do not require this security vetting level as a pre appointment condition but as owners of ViSOR, the police have specified the requirement to undergo NPPV and in order to perform their role staff will be subject to it. Alternative arrangements will need to be considered for individuals who are refused NPPV, including the possibility of redeploying the member of staff to other job roles.

#### **Section 4 Summary – Identifying Personnel Vetting Levels**

1. *To identify appropriate vetting requirements managers must refer to the mandated vetting levels and where the job role is not specified use the vetting Risk Assessment Tool or local risk assessment.*
2. Shared Services Connected Limited (SSCL) will carry out the required checks for staff, sessionals and non-directly employed workers.
3. Standard Plus in prison or community settings is specifically for ex-offenders working on reducing re-offending initiatives in prisons or providing probation services, it expires automatically after 1 year requiring a renewal request if still needed.
4. *The majority of staff must undergo a HMPPS Enhanced Check as a minimum.*
5. *Some HMPPS job roles with no prisoner contact, within the Probation Service will legally only require BPSS rather than the HMPPS Enhanced Check.*
6. Non-directly employed workers will undergo either a HMPPS Standard or Enhanced Check based on a risk assessment.
7. *All staff in child facing roles involving regular contact with children under 18 and healthcare professionals must have an Enhanced Disclosure and Barring Service check (formerly CRB disclosure) with barred list checks.*
8. Some staff and workers will be required to undergo National Security Vetting procedures at CTC, SC or very occasionally DV level.
9. HMPPS prison and probation staff working on ViSOR will be subject to NPPV level 2 or 3 which is evaluated through the police, but co-ordinated by SSCL.
10. Pre-existing DBS certificates are acceptable up to 12 months old.
11. Vetting renewal timeframes are set out in [Annex A](#)
12. Some HMPPS staff will be subject to police vetting at NPPV level 2 or 3 for ViSOR users.

## **SECTION 5 – MANDATORY VETTING LEVELS**

- 5.1 The HMPPS HQ, Probation Service & Prison Service posts below require a mandatory level of vetting. These are minimum levels and a higher clearance can be applied if determined by a risk assessment.

Directly Employed Post	Standard Plus(Prison & Community)	Baseline Personnel Security Standard (BPSS)	Enhanced Check Level 2	Disclosure & Barring Service (DBS) Check *	C T C	S C	D V
Senior Civil Servants***			√			√	
-Governors/Directors, Deputy Governors and Security Managers -Controllers, Deputy Controllers -All National Intelligence Unit (NIU) staff -DDC/Governors immediate support staff - All SOCT employees			√			√	
Employees in High Security Prisons (including Prison Officers) Chaplains Chaplaincy volunteers performing one to one faith activities Employees with access to Brent Fax machine Employees with a Vetting Contact Point responsibility			√		√		
All employees working in the Young Peoples (Juvenile) Estate Doctors and Dentists All clinical healthcare staff Psychologists, trainee psychologists Employees with access to ViSOR * Those working with under 18s (mother and baby etc) Staff authorised as officers of probation services			√	√			
Non High Security Prison Officers Non High Security staff Headquarters and HQ satellite staff Probation Service staff in HQ and divisions Non clinical healthcare staff			√				
Ex – Offenders working on “Through the Gate” and similar rehabilitative services**	√		√				
Probation Service administration job roles (non offender facing)	√						

\* ViSOR users are now subject to additional vetting requirements by the police who as data owners require HMPPS staff to undergo Non Police Personnel Vetting (NPPV) at level 2 or 3 depending on access rights. Further information is included in [PSI 06/2013 Mandatory Use of ViSOR](#)

\*\*Standard Plus can run concurrently with Enhanced Vetting Level 2 IF identified as a qualifying post.

\*\*\* Senior civil servants at Deputy Director level or above will need to be risk assessed for their role to determine if SC is required or not.

Non-directly employed Post	Standard Plus (Prison or Community)	Baseline Personnel Security Standard (BPSS)	Enhanced Level 1 (or 2 where required)#	Disclosure & Barring (DBS) Check *	C T C	S C	D V
Directors, Deputy Directors, Assistant Directors and immediate support staff All SOCT NDE workers			√			√	
Chaplains Chaplaincy volunteers performing one to one faith activities High Security Selected Personnel working on Electronic Monitoring Vetting Contact Points (VCP's)			√		√		
Agency Probation Officers		√		√			
Those working with under 18s (Juvenile Estate, Mother and Baby Units, Crèche volunteers etc.) Doctors and Dentists All clinical healthcare roles Psychologists, trainee psychologists			√	√			
Non High Security roles including prisoner custody officers (PCO's) Non clinical healthcare roles Chaplaincy Volunteers HQ and HQ satellite roles			√				
Ex-offenders & supervised individuals on license post release from custody**							
Probation Service agency administration job roles (non-offender facing)	√						
<b>Followed by Risk Assessment – Where Appropriate</b>							

\*previous DBS (CRB) disclosures are acceptable up to 12 months old.

\*\* Standard Plus can run concurrently with Enhanced Level 1 vetting IF identified as a qualifying post

### Section 5 Summary – Mandatory Vetting Levels

Some posts attract a mandatory security vetting level for reasons of access to information or systems.

*Disclosure and Barring Service checks must be undertaken on all staff and workers in regular contact with children under 18 and for healthcare professionals providing clinical services across the HMPPS estate. For Probation service providers Standard DBS checks may be required.*



## **SECTION 6 – HMPPS HEADQUARTER'S GROUPS**

- 6.1 *HMPPS must maintain up to date records on all Headquarters posts requiring National Security Vetting and these records must be reviewed annually and a return provided to the Corporate Security and Business Continuity Branch of the MoJ. The HQ Vetable Posts List annual check is instigated and managed by SSCL. Each Head of Group is responsible for providing an up to date list, with the returned and unreturned responses identified in the response.*

<b>Section 6 Summary – Headquarters Groups</b>
<ol style="list-style-type: none"> <li>1. Each Head of Group is responsible for providing an up to date list of HQ, Area and Divisional posts that hold National Security Vetting at CTC, SC and DV level. This is called the Vetable Post List.</li> <li>2. The Vetable Post List is managed and maintained by SSCL who provide an annual return to Corporate Security Branch.</li> <li>3. There is a mandatory requirement to notify changes in circumstances where you hold National Security Vetting at CTC, SC or DV level to <a href="mailto:MoJGroupSecurity@justice.gov.uk">MoJGroupSecurity@justice.gov.uk</a> .</li> </ol>

## **SECTION 7 - SECURITY VETTING RENEWALS AND CHANGES IN VETTING**

- 7.1 SSCL issue renewal notifications where NSV is due to expire. The renewal process covers directly employed staff and in addition sessional workers and re-employed pensioners. For Directly Employed staff, the Governor or Head of Group will receive the renewal notification 3 months prior to the expiry date from SSCL. *The establishment must then determine if the same level or a higher level of security clearance is required for the post. Where there are elements of doubt such cases should be referred to the Operational Security Group Approvals and Compliance Team (ACT) at mailbox [recruitment-decisions@justice.gov.uk](mailto:recruitment-decisions@justice.gov.uk). (See [Annex B](#) for definitions) Where doubt remains, the Assessment of Need form will determine the required level of National Security Vetting.*

Where a decision cannot be resolved the case should be referred to ACT. Case referrals should be the exception rather than the norm.

- 7.2 *Where the security vetting level remains the same individuals must submit a renewal form via their line manager. Information is available on My Hub and will be channelled through a Vetting Contact Point (VCP).*
- 7.3 *If the Risk Assessment Tool or Assessment of Need form for NSV identifies a change to the security vetting level is required - the manager must complete a VF2 Vetting Request Notification Form available on My Hub with the individual submitting a new Security Questionnaire and ensuring any changes in circumstances that have not previously been notified, are reported. Managers signing off the Vetting Request Notification Form must note on the form any relevant information they have acquired which may pose a risk and which has not already been notified to the Security Manager or Corruption Prevention Unit (CPU) under the requirements of this policy. It is important for the VCP to work closely with both the member of staff and MoJ Shared Services.*

### **Staff Vetting Renewals Staff at Enhanced Check 2 Level**

- 7.4 Staff vetting at Enhanced Check 2 level expires after 10 years for all directly employed staff (5 years for NDE). *3 months prior to expiry the prison establishment/business unit and individual will be notified that they must complete the Enhanced Check Renewal form. Staff will be required to undergo a criminal records check. This must be put through the VCP in both public and private prisons who will check the form and confirm despatch to SSCL.*

### **Non-directly employed Worker Vetting Renewals at Enhanced Check Level 1**

- 7.5 NDE workers Enhanced Checks will now expire every 5 years. Where an NDE worker's vetting was undertaken through SSCL a renewal notification will be sent out 3 months prior to expiry to the originating prison or location to ask if the individual requires renewal. In the absence of a response the vetting record will be closed on the system and they will be unable to enter HMPPS locations. *If the individual works at more than one location the VCP must ensure that the notification is passed on.*
- 7.6 *Where it is identified that the individual is no longer working for the service provider this must be notified to SSCL in order to close the vetting record. Each record closed reduces the cost to the organisation.*
- 7.7 *Where vetting renewal is required a risk assessment must be completed by the HMPPS sponsor or private prison equivalent to ensure the vetting level is still suitable for the job role.*

**Breaks in Service**

- 7.8 Where individuals leave the organisation for over 12 months there will be a requirement for renewal of security vetting on their return. This will also be required where an individual has been out of the United Kingdom for over 6 months during any absence from work.

**Section 7 Summary – Personnel Security Vetting Renewals**

1. SSCL will notify when National Security Vetting is due to expire.
2. Line management will need to undertake a risk assessment to ensure the level of security vetting is still appropriate to the job role.
3. *Sponsors agreeing to renew the vetting for an NDE worker must ensure the level of security vetting is still appropriate to the job role.*
4. Where additional security vetting checks are required you will need to follow the process outlined on My Hub.

## **SECTION 8 - SECURITY VETTING MOVEMENTS INTER MINISTRY AND OTHER GOVERNMENT DEPARTMENTS (OGD)**

- 8.1 *Where existing staff take up a new post or staff move into the HMPPS from another Government Department they must hold the appropriate level of security clearance for the post. If the individual holds an existing National Security Vetting (NSV) it can be accepted and transferred if it is still in date and provided their former department signs off that baseline checks were completed. For non-directly employed individuals/contractors consideration may be given to have existing clearance signed off by their previous employer/main contractor if they hold National Security Vetting in date at CTC or SC level and it is still required in their new job role. They will still be required to complete an abridged OGD Enhanced Level 2 application in order to register their details on the HMPPS vetting system, although this has a short processing turnaround once the form is completed correctly. In addition, a request to transfer the existing clearance will be required. Further information on how long national security vetting clearances last is contained within [Annex D](#).*
- 8.2 *The job sponsor must review the table of mandatory vetting levels for particular job roles and locations. For a transfer of security clearance the business unit will need to complete the appropriate "Confirmation of National Security Clearance form". Further information is available on the My Hub intranet website.*
- 8.3 *In normal circumstances where an applicant has been out of the Civil Service for over 12 months (for example on a secondment) or a career break of over 12 months, a new Enhanced Check (either Level 1 or 2 depending on specific circumstances) **must** be initiated. In addition, a new NSV or DBS application would also need to be initiated. Job specific higher level checks may also be undertaken. In certain circumstances a specific post may require the checks to be done sooner than 12 months because of the location of the post or the sensitive nature of the material the individual has access to.*

### **NON-DIRECTLY EMPLOYED PEOPLE WORKING IN MULTIPLE LOCATIONS**

- 8.4 It is also common for some non-directly employed workers to be undertaking services in a number of prison establishments as part of a national contract. Whilst it may be justified to re-check and conduct additional checks (i.e. CTC clearance) for a contractor moving from a prison in the main prison estate to a high security prison, there is no need to repeat checks where the risk associated with the work does not change. The Vetting Contact Point in each prison establishment can verify the level of security vetting held by SSCL to ensure this is acceptable and has not expired and the individual has not been out of the establishment for a period exceeding 12 months, which will merit re-vetting.

### **LEAVING THE ORGANISATION**

- 8.5 Staff and non-directly employed workers who leave the organisation due to resignation or through redundancy schemes as well as those workers whose contract ends due to completion of their service, must have their security pass and ICT equipment collected prior to departure. Equipment will be returned in the first instance to the line manager or job sponsor for NDE workers. This includes but is not restricted to, mobile phones, laptops, tablets, other electronic devices.
- 8.6 On departure any associated authority vested in the job role including certification of prisoner custody officers (PCO) in private prison and escort sectors ceases. Whilst vetting may remain in place for up to 12 months after departure based on the level of risk associated with a job role, certification is approved by the Secretary of State and will always require renewing on re-applying as a PCO elsewhere in HMPPS.

### Section 8 Summary – Security Vetting Transfers

1. Staff and non-directly employed people moving into new posts or joining from other Government Departments (OGDs) can get an existing National Security Vetting transferred from their former organisation (subject to confirmation).
2. Where an employee or non-directly employed worker have not worked in a Civil Service Department for over 12 months, renewed security vetting checks will be required.

## **SECTION 9 - ONGOING RESPONSIBILITIES – (REVIEW AND AFTERCARE)**

- 9.1 *Aftercare is the term used to describe the on-going management of staff and non-directly employed workers and does not end with satisfactory security clearance. These controls do not provide a guarantee of reliability and must be supported by effective line management. Individuals must report changes to their personal circumstances, including partners and criminal associates which may require them to be reassigned to other job roles. Governors/Directors and Heads of Group and line managers must ensure that local procedures are in place to notify the Approvals and Compliance team of any changes in circumstances.*
- 9.2 *Managers must be alert to changes in behaviour which may prompt concern about individual's integrity or ability to undertake a job role. If necessary a Security Information Report (SIR) should be raised locally.*
- 9.3 *Those responsible for filling posts requiring National Security Vetting must immediately bring it to the attention of Counter Corruption Unit (CCU) colleagues, who will be able to advise on appropriate steps to take. Managers and staff need to remain aware the checks are not a failsafe and people and attitudes change, either gradually or in response to particular events, and insider acts are often carried out by employees who had no malicious intent when joining the organisation but whose loyalties changed after recruitment/vetting.*
- 9.4 *In the case of Chaplains, including sessional Chaplains, such information must be passed to the Chaplaincy HQ team and by SIR internally.*

### **Changes in Circumstances**

- 9.5 It is the responsibility of both the line manager and individual to notify any changes in their circumstances over the course of their appointment. Security clearances are based on an assessment of personal circumstances at the time of the vetting checks. Changes to an individual's personal situation may impact their security clearance and need to be reported to help maintain the integrity of the vetting process. Examples include change of name due to marriage, criminal convictions, cautions, change of address. Further examples are included within [Annex F](#) Change of Circumstances.

### Areas of Vulnerability

- 9.6 Line managers should be aware of the circumstances and behaviour that could render staff susceptible to pressure or improper influence, or could otherwise indicate unreliability.
- 9.7 The CTC, SC and DV vetting processes provide an acceptable degree of assurance in respect of an individual's integrity and the appropriateness of access to sensitive HMPPS information and assets. Security vetting alone, though, does not provide an assurance as to the future reliability of an individual.
- 9.8 Further information is available from the Counter Corruption Unit (CCU) in Headquarters.

<b>Section 9 Summary – Aftercare</b>
<p><i>1. Staff and line managers responsibility does not end with the completion of security vetting checks and all must be alert to changes in behaviour which may prompt concern about individual's integrity or ability to undertake a job role.</i></p>

## **SECTION 10 – MONITORING & QUALITY ASSURANCE**

- 10.1 HMPPS will conduct internal risk-based audits of the vetting processes to demonstrate that practices comply with its policies and those of the Ministry of Justice.
- 10.2 *Information on Personnel security vetting checks managed locally must be available:*
- *To meet audit requirements;*
  - *To enable HMPPS to meet the Ministry of Justice's requirements to provide information and assurance.*
  -
- 10.3 *Arrangements must be made to ensure vetting procedures are being carried out effectively. Self-assessment, central reporting, audit and review, must combine together to provide a comprehensive framework of assurance across the organisation, as well as assisting in developing and refining policy.*
- 10.4 *All vetting data must be managed in accordance with the provisions of the Data Protection Act 1998, and policy provisions as set out in PSI 24 /2014 - AI 18/2014 - P I 18/2014 Information Assurance Policy.*

<b>Section 10 Summary – Monitoring</b>
1. <i>Information on pre appointment security vetting checks must be maintained for audit purposes to demonstrate that vetting procedures are being completed effectively.</i>

## **SECTION 11 – INFORMATION ASSURANCE IN VETTING**

- 11.1 The Data Protection Act 1998 places responsibilities on an employer to process personal data in a fair and proper way.
- 11.2 *The Act gives individuals certain rights in respect of the processing of their personal data and those carrying out selection processes must comply with the Act.* The Information Commissioners' have issued a Code of Practice specifically for those involved in recruitment and selection, which sets out benchmarks designed to ensure compliance with the Act. The Code can be obtained from the Information Commissioners' at [www.ico.org.uk](http://www.ico.org.uk)

Personnel Checks and National Security Vetting necessarily involves an employer in collecting and using information about workers and applicants. The Data Protection Act does not prevent an employer from carrying out effective Personnel checks but helps to strike a balance between the employer's needs and the applicant's right to privacy

- 11.3 *All completed Personnel checks and National Security Vetting documentation must be stored in line with the Government Security Classification system.* In most cases this will fall under an "Official" or "Official – Sensitive" classification, but could be higher in some cases. Information on the system is available in the following instruction [PSI 12-2014 - AI 10-2014 - PI 04-2014](#)

The Government Security Classification system is the Government's administrative system to ensure that access to information and other assets is correctly managed and safeguarded to an agreed and proportionate level. The Government Security Classification (GSC) is now a three tier system – OFFICIAL, SECRET AND TOP SECRET.

- 11.4 *Access to Criminal Records data relating to individuals is personally sensitive information and the Department must ensure that such information is handled correctly, ensuring that staff meet their obligations under the Data Protection Act 1998.*

*To achieve this, SSCL must ensure:*

- *That those handling criminal records data are aware of and correctly apply the information assurance policies of HMPPS.*
- *That criminal records information is not disclosed other than to those who need to know without the consent of the applicant, and that*
- *Such information is securely stored and only accessible by those staff that need to have access to the information to administer criminal records checks.*

- 11.5 *In addition to the Code all those involved in recruitment and selection must comply with the provisions of PSI 24 /2014 Information Assurance.* This HMPPS HQ & Prison Service Order gives guidance on the procedures for dealing with the handling of Prison Service data. It sets out the Services' obligations under the Act. In addition it outlines good housekeeping practice with regard to general records management.

*In accordance with the eight principles of data protection, personal information must be:*

- *Fairly and lawfully processed;*
- *Processed for specified purposes;*
- *Adequate, relevant and not excessive;*
- *Accurate and up to date (where appropriate);*
- *Not retained for longer than necessary;*
- *Processed in line with the rights of the individual;*

- *Securely kept;*
- *Not transferred to countries outside the European Economic Area (the EU, plus, Norway, Iceland and Liechtenstein) and Switzerland.*

<b>Section 11 Summary – Information Assurance in Vetting</b>
<ol style="list-style-type: none"><li>1. <i>All completed Personnel checks and National Security Vetting documentation must be stored in line with the protective markings system and processed in accordance with the Data Protection Act.</i></li></ol>

## **SECTION 12 – LEGAL COMPLIANCE**

- 12.1 *All recruitment into HMPPS must comply with UK Law following mandatory legislation and principles.*

*All decisions in relation to Personnel security vetting checks and National Security Vetting must comply with Statutory Requirements.*

## Annex A

**Security Vetting Expiry Table**

Each national security vetting level has a "shelf life", which is dependent on whether the applicant is a member of staff or a non-directly employed worker. This group includes:

- Contractors
- Consultants
- Agency
- Sessionals
- Fee Paid Workers
- Voluntary Workers
- Locums

Security Vetting Level	Directly employed Staff	Non-directly employed Workers
Enhanced Check 1		5 Years***
Enhanced Check 2	10 Years***	
Counter Terrorist Check (CTC)	10 Years **	5 Years
Security Check (SC)	10 Years **	7 Years
Developed Vetting (DV)*	7 Years	7 Years
Disclosure and Barring check	5 Years	5 Years

\* Additional charges are incurred for this vetting level

\*\* Anyone under 21 years old MUST only be issued clearance for 7 years so therefore staff with CTC and SC will need to renew earlier.

\*\*\* Enhanced Check has now been renamed to separately identify NDE workers and HMPPS staff

**National Security Vetting - Annual Review SC and DV**

One of the requirements for those holding SC or DV clearance is the completion of a review form, which Corporate Security and Business Continuity Branch (CSBCB) in the Ministry of Justice manage and collate. This is in order that any changes to your personal circumstances or other security issues that may be relevant to your post are identified. There are two forms that may be sent to you:

**1. Security Review Form – Part 1: Employee**

*All employees who hold SC or DV clearance are required to obtain and complete the form; this must then be returned to: Corporate Security and Business Continuity Branch*

*Ministry of Justice*

*9:01-102 Petty France*

*London*

*SW1H 9AJ*

In the case of those holding DV clearance, they are also required to pass a second form to their line managers for completion.

**2. Security Review Form – Part 2 (to be completed by line managers)**

*Where employees hold DV clearance, managers must obtain, complete and return the form to the address above.*

## **VETTING ROLES & RESPONSIBILITIES**

*Each business unit must identify the vetting liaison roles outlined below:*

### **Vetting Contact Point (VCP)**

The VCP role has incorporated the responsibilities of the Vetting Access Coordinator (VAC). The VCP is the primary point of contact on security screening of personnel. They provide liaison and support functions within prison establishments. In voluntary sector and certain commercial providers VCPs may be appointed subject to them successfully completing the HMPPS VCP training course. This is to allow them to undertake local checks for their own staff.

The vetting contact point is responsible for:

- Receiving completed vetting questionnaires and other relevant vetting forms and supporting documents for anyone applying for work at that Establishment, Group or Unit;
- Checking vetting questionnaires for completeness;
- Verifying identity, address, nationality and right to work of applicants;
- Chasing outstanding documentation from the applicant;
- Receiving returned vetting questionnaires from SSCL where they do not meet transaction standards;
- Face to face verifications of all applicants;
- Helps to protect the organisation against fraud by checking for fraudulent documentation.

Where a Vetting Questionnaire is incomplete or supporting documentation inadequate, the Vetting Contact Point is responsible for:

- Returning vetting questionnaire and documentation to applicant;
- Requesting missing information;
- Requesting outstanding supporting documentation to confirm identity, address and entitlement to work in the UK.

Where all information is provided, the Vetting Contact Point is responsible for:

- Photocopying, endorsing documents as complete, genuine and accurate;
- Certifying the photocopies as true copies of the original documents, having previously checked them for authenticity;
- Completing the Official Use Sections of the vetting questionnaire;
- Recording the documentation checked and confirming they are satisfied with the details provided;
- Sending vetting related documentation and vetting request forms to SSCL by the most appropriate method.

*Training is available and an assessment must be passed before taking up the VCP role.*

The Vetting Contact Point in public sector prisons, Probation Service and area business units also has read only access to vetting data on the Oracle/SOP system. It allows the business unit to:

- Monitor the progress of applicant vetting (employed and non-directly employed);
- View vetting details for employees within their own business unit;

- View vetting details for all non-directly employed workers that have been vetted by SSCL;
- Run vetting reports.

In private sector prisons and approved third party organisations the VCP will be able to check vetting records with SSCL by phone and then e-mail.

Training is available and is required before access is granted.

### **Vetting Outcome Decision Maker (VODM)**

This role is usually held by the Deputy Governor or equivalent such as the Head of Function (or someone nominated by such i.e. the local senior chaplain for chaplaincy) who will be responsible for:

- Deciding outcome of vetting cases for all Standard checks for non-directly employed workers where required;
- Notifying the Approvals and Compliance team of excluded non-directly employed workers;
- Liaising with the Approvals and Compliance team on vetting issues.

### **Approvals and Compliance Team**

This team will decide the suitability of applicants where judgement is required as a result of the security vetting checks undertaken. The team comprise a group of experienced Governors and non-operational prison and probation staff from across the Service who are able to assess and evaluate the evidence and associated risks, making decisions about candidates in the context of the work they will undertake in the HMPPS. They are responsible for:

- Making balanced judgements on evidence presented to judge if it is credible and they are suitable to work within the HMPPS organisation in either directly employed or non-directly employed roles;
- Contribute to managing the corporate risk;
- Providing assurance that Personnel Security Vetting Policy Standards are followed;
- Ensuring consistency of treatment;
- Ensuring security vetting levels are assigned appropriately and consistently;
- Involvement with vetting procedures relating to ex-offenders in [PSI 31/2012](#);
- Maintaining an exclusions database and acting as custodians of the Exclusion List.
- Deal with representations against vetting being refused.
- Links to the policy on Exclusions

### **Relationship between Security Vetting Roles**

*The vetting liaison roles are vital in ensuring Personnel security vetting checks are completed consistently, and must be nominated by the Deputy Directors (where applicable), Governor, Head of Group, or their representative. Once examined, staff undertaking local document verification will confirm via a clearance request form they are satisfied with the documentation presented. Where delays or doubts are raised about an application, the Approvals and Compliance team will be contacted and an evaluation made if the candidate can continue. If the issue is outside the vetting policy or there are elements of uncertainty, either the Approvals and Compliance team or the SSCL Vetting team will contact the Vetting Policy lead for an opinion or policy context. An effective security culture requires co-operation and communication between all stakeholders and collective responsibility to ensure applicants who may pose a threat or may bring discredit upon the organisation are successfully screened out.*

**Summary – Vetting Roles and Responsibilities**

1. The Vetting Contact Point (VCP) is the main point of contact in HMPPS for Pre- Appointment security screening.
2. The Vetting Contact Point can also provide information on vetting levels from the SOP (Oracle) system.
3. The Vetting Outcome Decision Maker (VODM) makes decisions on the outcome of Standard checks for non-directly employed workers.
4. The Approvals and Compliance team decide suitability to work for all successful candidates where clarity is required around vetting checks undertaken.
5. ACT decisions link into the policy of exclusions and the right of appeal against the initial ACT decision.

Vetting Level		Case Details	ID and Address	Right to Work	Employment References	Countersignatory Reference	Disclosure And Barring Service (DBS) Check	Qualifications	Professional Registrations	Criminal Conviction Check	National Security Vetting	Health Check	Final Decision	Vetting Renewals	NINO Check	Additional Employment References	Enhanced Baseline Standard	Renew Enhanced Baseline Std
	Standard Check	√	√	√						√							No longer used	No longer used
	Enhanced Check 1 or 2	√	√	√	1	√		2	3	√		1	√		5	6		
	National Security Vetting (CTC, SC, DV) Baseline Personnel Security Standard (BPSS)	√ √	√ √	√ √	√ √	√		2	3	√ √	√	1	√	4	5	6		

**Notes:**

1. Employment references are required for all Enhanced Level 2 applications for Directly Employed staff and Non-directly employed staff. Employment references do not form part of the Enhanced Level 1 check. It would be worth separating Enhanced Level 1 and Enhanced Level 2 in the table above.
2. Only when applicable to post
3. Only for healthcare professionals
4. Only applicable to renewals
5. Only applicable where the applicant has been self employed or there are significant gaps in employment history
6. Only applicable where there have been more than 3 employers in the last 3 years

## Annex D

**Racist Group Policy****Membership of Groups and Organisations with Racist Philosophy, Aims, Principles or Policies**

HMPPS has a policy of prohibiting people who work for it from being members of groups or organisations considered to have racist philosophy, principles, aims or policies. This is in support of the Service's declared principles and policy for promoting and sustaining racial equality and harmony.

This policy applies to anyone working for HMPPS who requires an Enhanced check.

In particular no one working for HMPPS can be a member of:

- British National Party
- National Front
- Combat 18

or any other group or organisation promoting racism.

Racism is defined as -:

*"Racism, in general terms, consists of conduct or words or practices which disadvantage or advantage people because of their colour, culture or ethnic origin. In its more subtle form it is as damaging as in its overt form" - Stephen Lawrence Report*

**For directly employed staff**

*All internal advertising contains a generic statement that when applying for a post applicants must confirm they do not belong to a group or organisation that the Service considers to have racist, philosophy, principles or policies. All external recruitment adverts must contain the following statement. "Applicants will be required to declare whether they are a member of a group or organisation which the HMPPS considers to be racist"*

Anyone applying to work for the Service through an external recruitment competition, re-employment, or through any form of internal competition is required to complete a declaration on their application form to confirm they do not belong to a group or organisation the Service considers to be racist. *Where someone moves on a managed transfer and does not complete an application form they must be asked to sign the declaration form. Failure to complete a declaration will render an individual ineligible, and they may not be selected/start work.*

*Where someone declares membership of a group or organisation other than the BNP, the National Front or Combat 18 advice must be sought from the Staff Equality and Diversity Policy team.*

All letters of appointment now contain a standard paragraph that any member of staff who is found to have made a false declaration or who becomes a member of a prohibited organisation after joining the HMPPS Prison Service will be subject to disciplinary procedures and possible dismissal.

## Annex E

## **Racist Group Policy Non-directly employed Workers**

*All non-directly employed workers who require an enhanced check must complete a declaration stating that they do not belong to a group or organisation that the HMPPS Prison Service considers racist.*

*The declaration must be submitted to those placing or using the worker who must check the declaration to confirm the applicant does not belong to a group or organisation the Service considers to have racist philosophy, principles or policies before an individual starts work. Where someone declares membership of a group or organisation other than the BNP, the National Front or Combat 18 advice must be sought from the Staff Equality and Diversity Policy team.*

## Change of Circumstances Notification

### Actions after been granted a security clearance

Once someone has been approved security clearance, there are a number of aftercare actions that help ensure the integrity of the vetting process.

The table below summarises the type of aftercare that needs to be considered and who is responsible for them.

ACTION REQUIRED	PERSON RESPONSIBLE
1. Reporting changes in circumstances	<p>Individual uses the Change of Circumstances form accessed below, or</p> <p>Line Manager/Head of Security and Intelligence using a Security Information Reporting (SIR) form or equivalent</p> <p>For NSV specific change in circumstances an email should be sent to MoJ Group security</p>
2. Re-vetting in line with specified vetting expiry dates	Shared Services Vetting team
3. Updating employer details if the individual transfers to another agency	SSCL administer the transfers process following notification
	VCP's do not update SOP for Transfers



# Ministry of JUSTICE

National Offender  
Management Service

## CHANGE OF CIRCUMSTANCES NOTIFICATION FORM

This form is to be completed by the individual, line manager or security manager

\*denotes mandatory field

To: **SSCL**

Email:

Mail:

### Section 1 – Level of clearance currently held

<input type="checkbox"/> <b>Baseline Personnel Security Standard (BPSS)</b>	<input type="checkbox"/> <b>Enhanced Check Vetting Level 1</b>	<input type="checkbox"/> <b>Enhanced Check Vetting Level 2</b>
<input type="checkbox"/> <b>Disclosure &amp; Barring Service Check</b>	<input type="checkbox"/> <b>Counter Terrorist Check (CTC)</b>	
<input type="checkbox"/> <b>Security Check</b>	<input type="checkbox"/> <b>Security Check (Enhanced)</b>	<input type="checkbox"/> <b>Developed Vetting (DV)</b>

### Section 1 – Personal Details of Individual

Family name *			Title	
Forenames *				
Gender *	<input type="checkbox"/> <b>Male</b>	<input type="checkbox"/> <b>Female</b>	National Insurance /Staff Number	
	Town/City		Country *	
Date of birth *		Place		
Work Phone *			Home Phone	
Mobile Phone				
Work E-mail *			Home E-mail	

Page 1 of 3

### Section 2 – Change(s) of circumstances

Please tick box/boxes to indicate the type of change and explain the change(s) in the **Details** box.

Change of address, or other contact details	<input type="checkbox"/>
Entering into, or ceasing a marriage, civil partnership or co-habiting	<input type="checkbox"/>
Other changes in your domestic circumstances	<input type="checkbox"/>
Entering into/changes to a personal relationship with a person residing in a foreign country	<input type="checkbox"/>
Residence in foreign country	<input type="checkbox"/>
Immediate family residing in foreign countries	<input type="checkbox"/>
Changes in citizenship or nationality	<input type="checkbox"/>
Changes in financial circumstances	<input type="checkbox"/>
Involvement in criminal activity	<input type="checkbox"/>
Criminal charges, warnings or convictions	<input type="checkbox"/>
Involvement with any individual, group, society or organisation that may be of security concern	<input type="checkbox"/>
Disciplinary procedures	<input type="checkbox"/>
Security Incidents	<input type="checkbox"/>
Any other changes in circumstance that you think may be of interest or concern	<input type="checkbox"/>

#### Details

Please give details of your change(s) of circumstances:

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### Section 3 – Declaration & Signature

*	The information I have provided is the truth to the best of my knowledge		
Date		Signature	

Note: If completed online type your name in the signature field.

### Change of Circumstances information

- While holding a security clearance all Individuals have responsibility to demonstrate awareness of security risks. These responsibilities include reporting all changes of personal circumstances to Shared Services. Reporting changes of circumstances should be made using this form.
- Not all changes increase the risk to security, but some changes of circumstances could affect aspects of your ongoing suitability to maintain a security clearance. Reporting all changes of circumstances allows HMPPS to assess the security risk, and in some cases, take the necessary steps to minimise the threat to national security.
- The information collected on the Change of Circumstances Notification is required to enable HMPPS to maintain an up to date Vetting Record. This information is collected, used and stored in accordance with the Data Protection Act and Government Security Classification (GSC) system.
- In some cases changes to your circumstances may also be reported to Shared Services by a manager, supervisor, Head of Security and Intelligence or a service provider organisation.
- The following list is a comprehensive, but not exhaustive, list of changes in circumstances that must be reported to the MoJ Group Security and SSCL:*
  - change of address, or other contact details.**
  - entering into, or ceasing a marriage, civil partnership or co-habiting.** This is to include information regarding personal relationships with any person overseas, either in person or online relationships
  - other changes in your domestic circumstances.** New housemates, relatives or adopted children sharing your home

- d) **Entering into/changes to a personal relationship with a person residing in a foreign country.** This is to include information regarding online relationships, as well as relationships in person
  - e) **residence in foreign countries.**
  - f) **Immediate family residing in foreign countries.** Please state any immediate family who has taken up residence in a foreign country.
  - g) **changes in citizenship or nationality.**  
**changes in financial circumstances.** This includes both receipt of large amounts of money as well as possible financial hardship
  - h) **involvement in criminal activity.**
  - i) **criminal charges, warnings or convictions.**
  - j) **involvement with any individual, group, society or organisation that may be of security concern.** This may include special interest groups relating to projects currently being undertaken by the individual. The groups may vary dependent on the individual's and the agency's roles
  - k) **disciplinary procedures.**
  - l) **security incidents.** This includes security breaches and agency or employer sanctions for code of conduct misconduct.
  - m) **any other changes in circumstance that may be of concern to HMPPS.**
6. Reporting all changes of circumstances ensures SSCL accurately maintains your personnel vetting record. Reporting all changes of circumstances ensures we can assess all changes of circumstance and minimise any risks.

### Change of Circumstances Notification