

Wiltshire Council human resources

Security vetting policy and procedure

This policy can be made available in other languages and formats such as large print and audio on [request](#).

What is it?

There are two types of security vetting checks which are undertaken for the following employees:

Non-Police Personnel Vetting (NPPV)

- NPPV will be required for Employees employed in roles which work closely with Wiltshire Police. NPPV is necessary to reduce the risks of unauthorised disclosure or loss of sensitive police information including (but not limited to) the unauthorised disclosure of information which could disrupt the prevention and detection of crime.
- Employees who have access to certain sensitive information via the public services network (PSN) who will require a baseline personnel security standard (BPSS) check.

This policy should be read in conjunction with the [recruitment policy](#) and the employee pre-employment checks policy.

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Who does it apply to?

This policy applies to all Wiltshire Council employees and teaching and non-teaching staff employed in maintained schools or academies. It also applies to temporary staff, contractors, Tupe staff, volunteers and agency staff.

When does it apply?

It applies when certain security checks are required for specified roles having access to particular sensitive or secure data.

When does it not apply?

Other checks apply during the recruitment process. Further information can be found in the [recruitment policy](#) and the [employee checks policy](#).

What are the main points?

What is security vetting?:

1. Vetting is intended to assure government bodies that you have not been involved in espionage, terrorism, sabotage or actions intended to overthrow or undermine parliamentary democracy by political, industrial, violent or other means. It also assures government bodies that you have not been a member of, or associated with, any organisation which has advocated such activities or has demonstrated a lack of reliability through dishonesty, lack of integrity or behaviour. Finally the process assures that you will not be subject to pressure or improper influence through past behaviour or personal circumstances.
2. Two types of security vetting checks may apply to you if you are carrying out certain roles at the council. These are:

NPPV – non police personnel vetting;
BPSS – baseline personnel security standard checks.
3. In all cases, the requirement for a check, together with the type and level, will be confirmed on your job description/role profile. Your manager is responsible for agreeing the type and level of check with the recruitment team and police vetting unit and, depending on the check required, with IT.

Non Police Personnel Vetting (NPPV):

4. As Wiltshire council now works in partnership with Wiltshire Police, some employees working in roles that work closely with the police will require NPPV clearance to reduce the risk of unauthorised disclosure or loss of sensitive police information

5. The purpose of this is to provide a means of ensuring that people other than police officers and police staff who have physical or remote access to police premises, information, intelligence, financial or operational assets, have been assessed in terms of their reliability and integrity.
6. There are 3 levels of NPPV which are based on access to premises, data, systems and sensitive information, with level 1 being the lowest level and 3 being the highest level of clearance.
7. The level of NPPV is determined by the police, in agreement with the manager or recruiting manager, in accordance with police policies and guidance. You may need to be re-vetted if your access requirements change, e.g. a level 3 check is required instead of level 2. At Wiltshire council we do not carry out level 1 NPPV.
8. NPPV Level 2 is required you if you have access to police premises and access to police information, intelligence and financial or operational assets. This allows regular access to 'confidential' police assets and occasional access to those deemed 'secret'.
9. A level 3 NPPV applies if you have regular unsupervised access to police premises and/or access to police information and/or information systems and/or hard copy material either on police premises or by remote access. This clearance allows regular, uncontrolled access to police systems which may contain protectively marked assets up to 'secret' level. Checks will be carried out on you, your spouse/partner, co-residents, and all family members.
10. A level 3 clearance will only be applied where it is necessary in order to safeguard employee personal welfare/safety and organisational security of Wiltshire Council and Wiltshire Police.
11. NPPV level 2 clearance will be valid for up to 3 years and a level 3 for a period of 5 years. Both levels will be renewed after the relevant time. Your manager will ensure that they manage the renewal process and do not allow clearances to lapse.
12. In line with the required vetting levels the following systems and checks may be carried out:

Level 2

13. For a level 2 check this will include:
 - Confirmation of entitlement to reside and work in the UK .
 - Your identity as well as your spouse, partner and co-habitee/ co-residents.
 - Known associates living at the same address
 - Police National Computer
 - Police National Database
 - Internal and external criminal intelligence

- Violent and Sex Offenders Register (ViSOR)
- Professional Standards Check
- Special Branch (local police checks)
- Financial check.
- Counter Terrorist Check may be applied where appropriate

Level 3

14. For a level 3 check, this will include:

- Confirmation of entitlement to reside and work in the UK.
- Your identity as well as your spouse, partner, co-habitee/ co-residents, parents, brothers, sisters and/or step-relatives
- Known associates living at the same address
- Police national computer
- Police national database
- Internal and external criminal intelligence
- Violent and sex offenders register (ViSOR)
- Professional standards check
- Special Branch (local police checks)
- Financial check
- Counter terrorist check (CTC) or security check (SC) may be applied where appropriate

15. Refer to NPPV flowchart for the security vetting process.

Who needs an NPPV check?

16. Wiltshire Council, in partnership with Wiltshire Police has clear business objectives for requesting NPPV. This includes an analysis of the role and whether NPPV is necessary to perform the role.
17. In order to work alongside the police, either in the same premises and/or on their IT systems remotely, you will be asked to undertake an NPPV Level 2 or 3 to obtain suitable clearance.
18. Corporate Directors, IT, the Programme Office, Community and Organisational Transformation, FM and MASH team members, due to their close working relationship with the police, may also require NPPV level 2/3, depending on the nature of their role.
19. New roles or significant variations to existing roles, where an NPPV may be required, must be reviewed by the Wiltshire Police vetting officer together with the recruiting manager.

NPPV process - applicants:

20. For the purposes of the recruitment process, any roles requiring NPPV must have this clearly stated on the role description, including the level required and the requirement for NPPV will be incorporated as an express term within the contract of employment.
21. This requirement must also be clearly stated on any adverts for the role, and should be made clear at the application and interview stage of the recruitment process. Any job offer made in relation to a role requiring NPPV will be expressed as being conditional upon satisfactory vetting clearance as well as satisfactory references and any other checks required.
22. Applicants for NPPV vetting clearance should understand and consent to the process taking place. Consent is given by you completing and signing the declaration on the vetting forms. You are advised that it is your responsibility to inform every person whose details you include on the vetting form that you have done so.
23. If you are an overseas applicant, when applying for posts that require NPPV, you are normally required to demonstrate that you have resided in the U.K for the past three years prior to your application date. Exceptions may be made for members of HM Forces who have been posted overseas.
24. You will not be permitted to commence employment without vetting clearance if it is a role where it is required.

NPPV clearance - temporary staff including contractors

25. Temporary staff will also be required to be security vetted. Managers must ensure that the employing agency has security checked a candidate before they start work.

NPPV clearance – the Wiltshire Temporary Bank

26. If you are to be employed through the WTB into a role requiring a security vetting check you cannot start work until security clearance has been received by the recruitment team.

Obtaining the NPPV check – applicants:

27. Once you have been selected as a preferred candidate and been sent a preferred candidate letter, the recruitment team will contact the police vetting unit with details of the request. The appropriate forms will be sent directly to you by the police.
28. Any forms not filled out completely will lead to a delay in the recruitment process.

29. Completed forms should be emailed to:

forcevetting@wiltshire.pnn.police.uk

30. The personnel security vetting unit within the police carries out all security clearances. They aim to complete clearances within 30 working days from receipt of the completed forms, however where further investigation is required it may take longer, and it could be up to 8 weeks. The vetting unit may contact you to discuss your vetting which will remain confidential between the vetting unit and you.

NPPV results – applicants:

31. Security clearances are granted refused, limited or withdrawn. Once the vetting has been completed, the vetting unit will contact you directly in the first instance, followed by the recruitment team, via email to confirm clearance.

NPPV - confirmation of successful clearance – applicants:

32. Where you are successfully cleared, this will be confirmed by the police vetting unit to the council's recruitment team who will in turn confirm this to the manager. The police vetting unit will confirm clearance to you at the same time, in writing.
33. A copy of confirmation of the clearance will be held on your HR record by the recruitment team.
34. Successful clearance, alongside other checks, means the recruiting manager will confirm a start date with you.

NPPV - security clearance failures – applicants:

35. In all cases, vetting decisions resulting in a failure and the reasons behind them (prevailing legislation and best practice guidelines permitting) will be communicated directly and, whenever practicable, in person to you by the police vetting unit.
36. In all cases of refusal / limitation, Wiltshire Police will invite you to a 'subject interview' so that you can be notified of the reason(s) behind the decision.
37. This process allows you the opportunity of discussing the vetting failure with the police vetting unit and then with the Wiltshire Council recruitment team/manager before the Wiltshire Police vetting unit formally does so via a formal disclosure.

38. Once you have been informed, after an agreed timescale, the police vetting unit will inform the recruitment team of the decision, along with the rationale and legal basis behind it (unless to do so might compromise a police operation or investigation.)
39. You will be contacted by the recruitment team and the relevant manager to discuss the implications of the decision regarding your suitability for appointment / employment in the post.
40. Where NPPV clearance is mandatory (for example, for roles with access to Wiltshire Police systems), failure of vetting will lead to a review of your suitability for employment in the role. This may lead to a retraction of the conditional offer of employment.

NPPV process – current employees:

41. Any roles requiring NPPV must have this clearly stated on the role description, including the level required, and the requirement for NPPV will be incorporated as an express term within your contract of employment.
42. If you are in a role that currently does not need an NPPV check, but moving to a role where vetting does apply, you will need to firstly be vetted.
43. If you are applying for NPPV vetting clearance you should understand and consent to the process taking place. Consent is given by you completing and signing the declaration on the vetting forms. You are advised that it is your responsibility to inform every person whose details you include on the vetting form that you have done so.
44. You will not be permitted to carry out your role without vetting clearance if it is a role where it is required.

Obtaining the NPPV check – current employees:

45. Your manager will contact the recruitment team if NPPV clearance is required who will in turn contact the police vetting unit with details of the request. The appropriate forms will be sent directly to you by the police.
46. Completed forms should be emailed to:

forcevetting@wiltshire.pnn.police.uk
47. The personnel security vetting unit within the police carries out all security clearances. They aim to complete clearances within 30 working days from receipt of the completed forms, however where further

investigation is required it may take longer, and it could be up to 8 weeks. The vetting unit may contact you to discuss your vetting which will remain confidential between the vetting unit and you.

48. Where a change in role or restructure within the council requires you to undertake NPPV for the first time, your manager will contact the recruitment team via email with the details of the request. The recruitment team will liaise with the vetting unit as above.

NPPV clearance – secondments:

49. If you are temporarily seconded into a role requiring an NPPV you will not be able to start work in the role until security clearance has been received by the recruitment team.

NPPV results – current employees:

50. Security clearances are granted refused, limited or withdrawn. Once the vetting has been completed, the vetting unit will contact you directly in the first instance, followed by the recruitment team, via email to confirm clearance.

NPPV - confirmation of successful clearance – current employees:

51. Where you are successfully cleared, this will be confirmed by the police vetting unit to the recruitment team who will in turn confirm this to your manager. The police vetting unit will confirm clearance to you at the same time, in writing.
52. A copy of confirmation of the clearance will be held on your HR record by the recruitment team.

NPPV - security clearance failures – current employees:

53. In all cases, vetting decisions resulting in a failure and the reasons behind them (prevailing legislation and best practice guidelines permitting) will be communicated directly and, whenever practicable, in person to you by the police vetting unit.
54. In all cases of refusal / limitation, Wiltshire Police will invite you to a 'subject interview' so that you can be notified of the reason(s) behind the decision.
55. This process allows you the opportunity of discussing the vetting failure with the police vetting unit and then with the Wiltshire Council recruitment team/manager before the Wiltshire Police vetting unit formally does so via a formal disclosure.

56. Once you have been informed, after an agreed timescale, the police vetting unit will inform the recruitment team of the decision, along with the rationale and legal basis behind it (unless to do so might compromise a police operation or investigation.)
57. You will be contacted by your manager to discuss the implications of the decision regarding your continued employment in your post or the retraction of an internal job offer.

NPPV checks – DBS (disclosure and barring service) checks:

58. If the role requires a DBS check as well as an NPPV check, you will be required to have both checks done. One does not take priority over the other.

NPPV appeals process in the case of security clearance failure – current employees:

59. Requests for an appeal must be made by you (or an individual representing you, with your written permission) and must take the form of a written letter detailing the grounds for appeal to the security vetting appeals panel and the Deputy Chief Constable of Wiltshire Police. The appeal letter should be sent to the force vetting mailbox (forcevetting@wiltshire.pnn.police.uk) if submitted electronically, or by post to:

Standards & Protective Security Manager
Business & People Development Command
Police Headquarters
London Road,
Devizes
SN10 2DN

60. The recruitment team and your current manager should be informed if you wish to lodge an appeal.

The role of the council in appeals – current employees:

61. Wiltshire Council will play no part in the police appeal process, regarding the vetting process or result.

Failure of the NPPV check - current employees:

62. If you fail the NPPV check and your appeal to the police is unsuccessful, the council will then consider:
 - (a) allowing you to continue in your current role, with certain restrictions

in place meaning you cannot have access to secure systems or police sites; or

(b) redeployment into another role within the same team or service area; or

(c) redeployment into another role within the council; or

(d) termination of your contract of employment.

63. You will remain in the redeployment pool for a period of 12 weeks during which time every effort will be made to find you alternative employment. Termination of your contract will therefore be the last resort.

Suspension or withdrawal of existing NPPV clearance - current employees:

64. In all cases and before dismissal is considered, the council will firstly consider:

(a) allowing you to continue in your current role, with certain restrictions in place meaning you cannot have access to secure systems or premises; or

(b) redeploying into another role within the same team or service area; or

(c) considering redeployment into another role within the council.

65. You may currently have security vetting clearance but this may be withdrawn or suspended due to misconduct or other circumstances:

a) Misconduct:

- The council will notify the police if there is an act or allegation of misconduct/gross misconduct that is relevant to the vetting status.
- The police may also notify the council of a change in your vetting status brought about by an act of misconduct carried out in your own time.
- Should you notify the council of a new caution, reprimand, warning or conviction relating to you, it will be necessary for the council to notify the police to ascertain whether your security vetting status is affected. You are reminded that you are required under the terms of your contract to notify your manager of a new warning, caution, reprimand or conviction.
- It is likely that the council's disciplinary procedure will be invoked to investigate any allegations of misconduct which may affect

your vetting status. Refer to disciplinary procedure.

(b) Other circumstances

- The council or Police may receive information about actions, events or allegations related to a third party that may affect your own vetting status (but not carried out by you) e.g. known criminal associates residing at the same address. An investigation will be carried out under the council's SOSR policy.
66. Under both these circumstances your vetting status may be suspended whilst an investigation takes place. Where vetting is temporarily suspended the following options are available to managers:
- Your manager will endeavor to seek temporary alternative duties which do not require vetting clearance and which you have the skills to perform. This may be within a different team, location or service area within Wiltshire Council.
 - If alternative duties are not available, you may be sent home on paid leave. During this period, you will be paid in full and retain full employment rights, but will not be required to attend work. The paid leave will not be taken from your leave allowance, however, if alternative duties are found in the meantime, you will be asked to report to work for the temporary duties.
67. Where a situation arises which leads to the withdrawal of vetting clearance, you will no longer be able to meet the terms and conditions of being employed in your role. This, depending upon the reason for the vetting failure, could result in disciplinary proceedings (if the reason is your misconduct). You will remain in the redeployment pool for a period of 12 weeks during which time every effort will be made to find you alternative employment. Termination of your contract will therefore be a last resort.

Retrospective NPPV checks – current employees:

68. Where there is a business case to do so, it may be necessary for the council to change the vetting requirements of a post as a result of a change to the post's level of access to police premises, information, IT services and/or assets. In such cases, you may find that you become subject to NPPV where this has not previously been necessary.
69. Where this occurs, the manager will meet with you to discuss the change before it is made to advise you that you will be required to

apply for vetting and your agreement will be sought.

70. If you are refused NPPV or fail clearance or if you refuse to participate in the vetting process, and where this is now a mandatory requirement for your role, there may be implications for your continued employment in your role.
71. In all cases and before dismissal is considered, the council would firstly consider:
 - (a) allowing you to continue in your current role, with certain restrictions in place meaning you cannot have access to secure systems or police sites; or
 - (b) redeploying into another role within the same team or service area; or
 - (c) redeployment into another role within the council; or
 - (d) termination of your contract of employment.
72. You will remain in the redeployment pool for a period of 12 weeks during which time every effort will be made to find you alternative employment. Termination of your contract will therefore be the last resort.
73. This would not constitute a redundancy situation, as the post will continue to exist.
74. You are free to disclose any element of your vetting process with your line manager; however the police vetting unit will only disclose details of the vetting process with the council where this is necessary, and only with the permission of the applicant.

Baseline personnel security standard checks (BPSS):

75. BPSS is the minimum standard required to ensure the identity and integrity of an employee with access to sensitive information. It is a valuable information assurance (IA) control in determining if employees are suitable for accessing certain information assets. It involves four main elements:
 - an appropriate identity check
 - confirmation of nationality & immigration status
 - employment history (for the past 3 years)
 - third-party verification of unspent convictions.
76. The council is bound by the terms of the PSN [code of connection](#) and if you are bound by this code and working on the public services network (PSN) you will require a BPSS check.

Who needs a BPSS check?

77. You will need a BPSS check if you have access to the PSN which is the government's wide area network (WAN). It is a government requirement that employees of the council who are in roles with access to the PSN must have a BPSS check before being given access to the PSN. It also applies to temporary staff, contractors, volunteers or agency staff working on the PSN on behalf of the council.

BPSS vetting process – applicants

78. The recruiting manager will specify whether a BPSS check is required on the role description. New roles or significant variations to existing roles must be reviewed by your manager. Any roles requiring a BPSS check must have this clearly stated on the job description/role profile.
79. The job advert and contract of employment will confirm that a BPSS check will be required.
80. You must understand and consent to the vetting process taking place. Consent is given by you when you complete the online vetting application form. You are advised that it is your responsibility to inform every person whose details you include on the vetting application, that you have done so and that they are subject to vetting as part of your own BPSS vetting.

BPSS clearance - temporary staff including contractors:

81. Temporary staff will also be required to be security vetted. Managers must ensure that the employing agency has security checked a candidate before they start work.

BPSS clearance – the Wiltshire Temporary Bank:

82. If you are to be employed through the WTB into a role requiring a security vetting check you cannot start work until security clearance has been received by the recruitment team.

BPSS checks – disclosure and barring service (DBS) checks:

83. If you are subject to a DBS check as part of your role, you may not also need a BPSS check.

Process for obtaining the BPSS check – applicants:

84. Once you have been selected as a preferred candidate and have received a preferred candidate letter, the recruitment team will liaise with you in order for you to complete a BPSS application. The BPSS vetting

application will be sent to Atlantic Data, once you have completed it. You will be required to provide certain original documents in order for the BPSS application to be completed.

85. Atlantic Data process BPSS checks and aim to complete clearances within X number of working days. However where further investigation is required this may take longer and may result in a delay in the recruitment process
86. You will not be issued with a contract of employment, until vetting clearance has been confirmed. Any job offer will be made conditional upon receiving a satisfactory BPSS clearance as well as satisfactory references and any other checks required.
87. Refer to BPSS process flowchart.

BPSS results – applicants:

88. Once the vetting has been completed, Atlantic Data will contact you directly to confirm that your BPSS check has been cleared or refused. Neither the recruitment team nor your manager will see this clearance. The recruitment team will, however, be able to check the BPSS online system which will confirm whether positive data has been confirmed, but they will not be able to see what this is.

BPSS - confirmation of successful clearance – applicants:

89. Where you are successfully cleared, this will be confirmed by Atlantic Data directly to you. You will need to provide a copy of your clearance to the recruitment team.
90. A copy of confirmation of the clearance will be held on your HR record by the recruitment team.

BPSS security clearance failures – applicants:

91. If a BPSS clearance fails, or there are limitations placed on granting it, the recruitment team will contact you to ask you to come to a meeting and will ask you to bring your BPSS failure with you. However in certain circumstances it may not be possible to share such information as this could compromise national security, the public interest or third party confidentiality.
92. If your BPSS check has failed, it may not be possible to continue to the confirmation of employment stage with you. In this case, your conditional offer of employment may be withdrawn.

93. The recruitment team will arrange a meeting with you so that you can be notified of the reason(s) behind the decision, and provided with the opportunity to discuss, comment and challenge the reason(s), and its implications prior to the withdrawal of any offer of employment. This will not affect your right to apply for and be interviewed for employment elsewhere within the council.

Appeals against failure – BPSS checks – applicants:

94. If you fail a BPSS check, there is no right of appeal.

BPSS process – current employees:

95. Your manager will specify whether a BPSS check is required on the role description. New roles or significant variations to existing roles must be reviewed by your manager. Any roles requiring a BPSS check must have this clearly stated on the job description/role profile .
96. The job advert and contract of employment will confirm that a BPSS check will be required.
97. If you are subject to a DBS check as part of your role, you may not also need a BPSS check.
98. If you are in a role that currently does not need a BPSS check, but moving to a role where vetting does apply, you will need to firstly be vetted.
99. You must understand and consent to the vetting process taking place. Consent is given by you when you complete the online vetting application. You are advised that it is your responsibility to inform every person whose details you include on the vetting form, that you have done so and that they are subject to vetting as part of your own BPSS vetting.
100. Where a change in role or restructure requires you to undertake a BPSS check, the new manager will contact the recruitment team via email with the details of the request.

BPSS clearance – secondments:

101. If you are temporarily seconded into a role requiring an BPSS you will not be able to start work in the role until security clearance has been received by the recruitment team.

BPSS checks – disclosure and barring service (DBS) checks:

102. If you are subject to a DBS check as part of your role, you may not also need a BPSS check. Refer to the recruitment team for advice.

Process for obtaining the BPSS check – current employees:

103. If a BPSS check is required in your current role, your manager will email the recruitment team with details of the application. The recruitment team will liaise with you in order for you to complete a BPSS application. The BPSS vetting application will be sent to Atlantic Data, once you have completed it. You will be required to provide certain original documents in order for the BPSS application to be completed.
104. Atlantic Data process BPSS checks and aim to complete clearances within X number of working days. However where further investigation is required this may take longer and may result in a delay.
105. Refer to BPSS process flowchart.

BPSS results – current employees:

106. Once the vetting has been completed, Atlantic Data will contact you directly to confirm that your BPSS check has been cleared or refused. Neither the recruitment team nor your manager will see this clearance. The recruitment team will, however, be able to check the BPSS online system which will confirm whether positive data has been confirmed, but they will not be able to see what this is.

BPSS - confirmation of successful clearance – current employees:

107. Where you are successfully cleared, this will be confirmed by Atlantic Data directly to you. You will need to provide a copy of your clearance to the recruitment team.
108. A copy of confirmation of the clearance will be held on your HR record by the recruitment team.

BPSS security clearance failures – current employees:

109. If a BPSS clearance fails, or there are limitations placed on granting it, the recruitment team will contact you to ask you to come to a meeting and will ask you to bring your BPSS failure with you. However in certain circumstances it may not be possible to share such information as this could compromise national security, the public interest or third party confidentiality.

Appeals against failure – BPSS checks – current employees:

110. If you fail a BPSS check, there is no right of appeal.

Failure of the BPSS check - current employees:

111. If you fail the BPSS check the council will consider:

- (a) allowing you to continue in your current role, with certain restrictions in place meaning you cannot have access to secure systems; or
- (b) redeployment into another role within the same team or service area; or
- (c) redeployment into another role within the council; or
- (d) termination of your contract of employment.

112. You will remain in the redeployment pool for a period of 12 weeks during which time every effort will be made to find you alternative employment. Termination of your contract will therefore be the last resort.

Suspension or withdrawal of BPSS clearance - current employees:

113. During the security vetting process involving current employees, there may be circumstances where there is security vetting refusal or suspension.

114. You may currently have security vetting clearance but this may subsequently be withdrawn or suspended due to misconduct:

- The council will notify the police if there is an act or allegation of misconduct/gross misconduct that is relevant to your vetting status.
- The police may also notify the council of a change in your vetting status brought about by an act of misconduct carried out in your own time.
- Should you notify the council of a new caution, reprimand, warning or conviction relating to you, it will be necessary for the council to notify the police to ascertain whether your security vetting status is affected. You are reminded that you are required under the terms of your contract to notify your manager of a new warning, caution, reprimand or conviction.
- It is likely that the council's disciplinary procedure will be invoked to investigate any allegations of misconduct which may affect your vetting status. Refer to disciplinary procedure.

115. Under both these circumstances your vetting status may be suspended whilst an investigation takes place. Where vetting is temporarily suspended the following options are available to managers:
- Your manager will endeavor to seek temporary alternative duties which do not require vetting clearance and which you have the skills to perform. This may be within a different team, location or service area within Wiltshire Council.
 - If alternative duties are not available, you may be sent home on paid leave. During this period, you will be paid in full and retain full employment rights, but will not be required to attend work. The paid leave will not be taken from your leave allowance, however, if alternative duties are found in the meantime, you will be asked to report to work for the temporary duties.
116. Where a situation arises which leads to the withdrawal of vetting clearance, you will no longer be able to meet the terms and conditions of being employed in your role. This, depending upon the reason for the vetting failure, could result in disciplinary proceedings or you being placed in the redeployment pool. You will remain in the redeployment pool for a period of 12 weeks during which time every effort will be made to find you alternative employment. Termination of your contract will therefore be the last resort.
117. In all cases and before dismissal is considered, the council will firstly consider:
- (a) allowing you to continue in your current role, with certain restrictions in place meaning you cannot have access to secure systems; or
 - (b) redeploying into another role within the same team or service area; or
 - (c) considering redeployment into another role within the council.

Retrospective BPSS checks – current employees:

118. Where there is a business case to do so, it may be necessary for the council to change the vetting requirements of a post as a result of a change to the post's level of access to secure data. In such cases, you may find that you become subject to BPSS where this has not previously been necessary.
119. Where this occurs, the manager will meet with you to discuss the change before it is made to advise you that you will be required to apply for vetting and your agreement will be sought.
120. If you are refused BPSS clearance or if you refuse to participate in the

vetting process, and where this is now a mandatory requirement for your role, there may be implications for your continued employment in your role.

121. In all cases and before dismissal is considered, the council would firstly consider:
- (a) allowing you to continue in your current role, with certain restrictions in place meaning you cannot have access to secure systems or police sites; or
 - (b) redeploying into another role within the same team or service area; or
 - (c) redeployment into another role within the council;
 - (d) termination of your contract of employment.
122. You will remain in the redeployment pool for a period of 12 weeks during which time every effort will be made to find you alternative employment. Termination of your contract will therefore be the last resort.¹²³ If you refuse to apply for vetting, this will not be considered a disciplinary matter, but will result in you being unsuitable for that post. In most cases, you will be placed in the redeployment pool (although individual circumstances of each case will be taken into consideration). This could potentially result in termination of employment should no suitable alternative role be available under SOSR (some other substantial reason).
124. This would not constitute a redundancy situation, as the post will continue to exist.
125. You are free to disclose any element of your vetting process with your line manager; however the police vetting unit will only disclose details of the vetting process with the council where this is necessary, and only with the permission of the applicant.

Data protection

126. The council will keep the results of any security vetting clearance or failure, confidential. The results of your security vetting check will be treated in accordance with the Data Protection Act.

Roles and responsibilities

Employee/candidate responsibilities

127. To comply with all security vetting check procedures.
128. To notify your manager if you have a new warning, reprimand, warning or conviction which may affect your vetting check, either a new check or a current one.

Line manager responsibilities

129. To ensure relevant recruitment paperwork such as job description, role profile, etc, is updated to reflect the relevant type of check required for the role.
130. To liaise with the recruitment team to ensure security vetting is carried out prior to the candidate starting work.
131. To clarify any questions candidates may have about their security vetting check and the council's policy.
132. To work with the recruitment team in order to withdraw a conditional offer of employment should a vetting check be failed.
133. To keep up to date records for team members requiring vetting checks, ensuring that the required security vetting is in date and current. When renewals are required make sure the processing time is factored in.

Recruitment team responsibilities

134. The recruitment team will carry out BPSS checks in liaison with our external supplier, Atlantic Data.

Police vetting:

135. To carry out NPPV
136. To notify the results of a refused NPPV to the vetting subject.
137. To notify the results of an NPPV to the recruitment team.

HR responsibilities

138. To provide guidance on this policy.
139. To provide guidance and support to the manager should a conditional offer of employment have to be withdrawn.

Frequently asked questions

- 140. I have been in my current role for a few years and am now required to have NPPV. I am worried about this as I had a caution for a minor offence a couple of years back. What should I do?**

The police will decide, via NPPV, whether the caution you had affects a role you are doing now. If you are refused clearance, then next steps will be discussed with you.

141. I feel that carrying out security checks into my background and that of my family and associates is an infringement of my privacy. Why is this necessary?

If the role you are in means you are in contact with sensitive police or government data, it will be a requirement of your role that you have an NPPV or BPSS check. These checks are necessary to the carrying out of the legitimate aims of seeking to prevent disorder and crime and to the detection of crime. You will not be able to carry out your role without a check having been completed and a satisfactory response received. We would hope for your understanding in this matter.

142. I do not wish to submit to a security check. What should I do? Can I continue in my current role?

No, if your current role requires a check is carried out, you will not be able to carry on in your role if you refuse to have a check done. In some cases, managers may allow you to continue you working in your role but may change your job role such that you do not have access to sensitive police or government data. It may be necessary to move you to another role.

143. Does an NPPV or BPSS check cost me anything?

No, the cost is borne by your service area.

144. Who will be checked for level 3 NPPV and what will be checked?

This will depend on your level of access to police systems. This will be discussed with you in advance. NPPV is a full check into your background.

145. How long will a security check take?

NPPV may take up to 8 weeks. BPSS – tbc.

146. How long is a security check valid for?

Level 2 NPPV is valid for 2-3 years; a level 3 NPPV for 5 years.

There is no time period that a BPSS check is valid for. Your manager may require you to be rechecked after three years.

147. Can I take on the security clearance of another employee as I am transferring into their role and they are moving to another role?

No, you must have your own security clearance carried out as the check looks at the background of the person carrying out the role.

148. Can I start work in the role before security clearance is confirmed?

No, the security check must have been confirmed as cleared before you may start work.

149. I am a contractor/agency staff. Do I need security clearance?

If you are working in a role that requires NPPV or a BPSS check, then yes, you will require clearance before you may start work with the council.

150. Will clearance be refused if I have a spent conviction?

Not necessarily. It depends whether the check reveals information about you which is relevant to the secure role you are carrying out now.

151. I already have an NPPV check and the new role requires a DBS check. Do I still have to have the DBS check?

Yes, you do still have to have the DBS check if required for the role. The checks assess similar aspects but not exactly the same. Also for those working with children or vulnerable adults, the council must assure itself of suitability to perform the role through the DBS. We would therefore always require a DBS check too, where required for the role.

152. I have a considerable student loan. Will this go against me when my finances are checked?

No. The financial checks are credit reference checks looking at whether you have defaulted on any loans, registered as bankrupt or find yourself in a vulnerable position financially. One of the reasons for this is to calculate the risk of employing you in a position where you have access to sensitive information which may be of financial value to others.

153. I have significant mental health issues and was charged for committing a crime whilst I was not of sound mind. Will this be taken into account in the NPPV process?

The vetting unit visit each application on a case by case basis, using the information provided. To this end it is essential that you provide as much detail as possible when completing the form. If there is any doubt the application may be referred to their medical officer to consider.

154. I have been refused NPPV and have not had found a job in the redeployment pool. I need to apply for some external jobs but I am not sure what to put as my reason for leaving and what my reference will say.

If you find a new job before the council has exhausted its attempts to redeploy you, you are able to resign and your resignation will show on your employment record as your reason for leaving. Alternatively a reason for leaving will be agreed with you.

If it is not possible to redeploy you following a period of 12 weeks in the redeployment pool, your contract will be terminated. Your individual circumstances will be taken into account, including previous conduct and length of service, and this will be reflected in your reference.

155. I have been told I will go into the redeployment pool. How does it work?

The redeployment pool is a 'virtual pool' of employees who are facing risk of termination of employment. This enables you to be given prior consideration to be matched to suitable alternative employment. You will be in the recruitment pool for up to 12 weeks.

Suitable employment opportunities will be based on the following criteria:

- job duties and responsibilities
- knowledge, skills and experience
- same job grade one grade above or one grade below (for ex-district council employees it is the Wiltshire grade for your post that will be used)
- working hours and time
- location

The recruitment team match vacancies to those in the redeployment pool. You should also check via the [wiltshire council recruitment website](#).

Definitions

NPPV: Non police personnel vetting – required for anyone working directly with the police.

BPSS: Baseline personnel security standard. Required for anyone working on the government's PSN.

DBS: Disclosure and Barring Service.

Equal Opportunities

This policy has been Equality Impact Assessed (link to EIA for policy) to identify opportunities to promote equality and mitigate any negative or adverse impacts on particular groups.

If appropriate:

Managers will make any necessary adjustments to ensure that all employees are treated fairly. For further information see the guidance on equal opportunities in (link to equal opps guidance)

Legislation

- [PSN code of connection](#)
- Data Protection Act
- Freedom of Information Act
- The vetting code of practice as part of the police code of ethics.

This policy has been reviewed by an external legal organisation to ensure compliance with (the above legislation and) our statutory duties.

Advice and guidance

If you require help in accessing or understanding this policy [or completing any of the associated forms] you should contact your line manager or trade union representative if you are a member.

If, due to the nature of your query, it is not appropriate to contact your line manager you should contact your head of service who will nominate an appropriate manager or colleague to help you.

See :

- [guidance for managers – giving advice on policies.](#)

Further information

There are a number of related policies and procedures that you should be aware of including:

- Disciplinary policy and procedure
- SOSR policy and procedure
- Recruitment Policy
- Employee Checks Policy (new)
- DBS Policy

There is also a toolkit including manager guidance and supporting documents to use when following this policy and procedure.

- Flowcharts

For further information please speak to your supervisor, manager, service director or contact your HR case adviser.

Policy author	HR Policy and Reward Team – (ML&RW)
Policy implemented	DD-MM-YYYY
Policy last updated	DD-MM-YYYY

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