



THE POLICE AND CRIME COMMISSIONER FOR CLEVELAND AND THE CHIEF CONSTABLE FOR CLEVELAND

Vetting

Internal Audit Report: 1.22/23

FINAL

17 May 2022

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1. EXECUTIVE SUMMARY

Why we completed this audit

As part of the approved internal audit plan for 2022 / 2023, we have undertaken a review of the Force's vetting process to ensure the Force has a thorough and effective vetting regime in place, in line with the requirements of the authorised professional practices (APP) Vetting (March 2021) guidance produced by the College of Policing and the Code of Practice for Vetting (2017). As part of the review, we have assessed several control areas including the appeals process for unsuccessful applicants, reporting of performance measurements, appropriate user access restrictions to the vetting database and suitable processes have been implemented for transferees and re-joiners. In testing the vetting process, we have conducted extensive sample testing for all vetting types completed by the Force.

The Force are responsible for undertaking the vetting for all employees and for any contractors used by themselves or that have access to police systems. Non-Police Personnel Vetting levels are:

- NPPV 1;
- NPPV 2 abbreviated;
- NPPV 2 full; and
- NPPV 3.

The vetting levels for officers and staff within the Force are:

- Management Vetting (MV); or
- Recruitment Vetting (RV).

To support forces in the completion of the vetting process, the College of Policing has released several guidance documents including the Authorised Professional Practice (APP) Vetting, the Vetting Code of Practice, and the National Decision Model (though the model is not exclusively used for vetting). We have conducted our testing, assessed the Force's controls, and determined a level of assurance against the requirements within these guidance documents.

The Force uses the Core-vet vetting database which is one of the primary vetting systems used by other forces within the country. Within the system, the Force record any vetting checks completed, document the overall decision made and supporting rationale, and store supporting evidence within the document section on the system. The vetting team, within the Standards and Ethics department, are responsible for completing all vetting. The Head of Information reports to the Superintendent of DSE, and the Superintendent reports to the Director of DSE.

Conclusion

The vetting controls tested as part of the review are working effectively in some areas to ensure staff and non-police personnel are appropriately vetted prior to appointment. However, we identified some areas in which the designed controls are not working as intended and have agreed **one high, two medium and two low** priority management actions.

The Force currently have a large backlog of expired vetting and vetting statuses which are due to expire. A resource paper has been produced to help manage this problem and the Growth Optimisation Working Group approved the uplift of one Vetting Researcher to a Senior Vetting Researcher, and the appointment of two additional FTE Vetting Researchers. Where an extensive backlog of expired vetting exists, the Force risk non-compliance with APP vetting guidance and this could lead to inappropriate vetting statuses not being identified or revoked in a timely manner.

Other identified issues include the storage of documentation of vetting appeals for individuals with protected characteristics on the Core-vet system, review of access rights for admin users on the Core-vet system, and missing data retention controls on the Core-vet system. Further details of these actions can be found under section two of this report.

Internal audit opinion:

Taking account of the issues identified, the Police and Crime Commissioner for Cleveland and the Chief Constable of Cleveland can take **partial assurance** that the controls upon which the organisation relies to manage this area are suitably designed, consistently applied or effective.

Action is needed to strengthen the control framework to manage the identified risk.



Key findings

We identified the following finding that has resulted in one high and two medium priority management actions being agreed:



The Force currently has a backlog of expired vetting and upcoming vetting that is due for expiry in the coming years. The Head of Information Management confirmed that this is a known problem, and a resource paper has been created and recently approved by the Growth Prioritisation Working Group. We reviewed a copy of the resource paper and noted that, as of the 24 November 2021, the Force had 2,882 expired clearances consisting of both Cleveland Police employees and non-police personnel who require NPPV vetting (such as contractors).

Since November 2021, this figure has been reduced by approximately 20%, according to the resource paper submitted by the Vetting Team, as it is estimated that these individuals have either left the Force or are no longer contractors and therefore do not require vetting. However, estimates for the upcoming years identify another 601 individuals with expiring vetting in 2022-23, 449 in 2023-24 and 425 in 2024-25, and as a result, it is expected that this backlog will continue to grow. There is a risk that if the Force do not resolve the backlog through the additional resources, the vetting backlog could increase leading to more officers and contractors going unchecked, which could risk non-compliance with APP guidance.

(High)



The Vetting Team Supervisor explained staff with MV and NPPV-3 vetting clearance are required to have a vetting review at 28 months and 56 months into the vetting lifecycle, in line with APP guidance which states two checks are required during the lifetime of clearance. However, in late 2021, it was identified that the Vetting Team had not been undertaking these periodic reviews and work has started to rectify this. The Vetting Admin Assistant is working back through all individuals with MV and NPPV-3 clearance to schedule two reviews in the Core-vet system. The Vetting Admin Assistant had worked back to November 2019 at the time of the audit and work was ongoing.

Where individuals with NPPV-3 and MV clearance do not have two vetting reviews scheduled, there is a risk the Force are not adhering to APP vetting guidance and vetting clearance may not be up to date. **(Medium)**



We asked the Head of Information management whether the Force have any data retention scheme in place for data held on Core-vet. It was explained that there is currently nothing in place; however, discussions are currently underway to implement a data retention feature. Once implemented, rejected records will be deleted after a set period of time. There is a risk if rejected records are kept on file indefinitely, the Force could be in breach of data protection legislation. **(Medium)**

For details of the remaining **two low** priority actions, please see section two of this report.

Our audit review identified that the following controls are suitably designed, consistently applied, and are operating effectively:



Non-Police Personnel Vetting (NPPV) is completed by the Vetting Team for individuals such as contractors to ensure they have the appropriate checks before any access to police systems is granted. We selected a sample of 20 individuals that require NPPV clearance consisting of:

- Five NPPV 1 cleared (from a total of 75);
- One NPPV 2 abbreviated refusal (from a total of five);
- Five NPPV 2 abbreviated cleared (from a total of 115);
- One NPPV 2 full refusal (from a total of 14);
- Five NPPV 2 full cleared (from a total of 52); and
- Three NPPV 3 cleared (from a total of 11).

Upon review of the 20 applications, we confirmed that:

- the outcome and decisions regarding vetting status were clearly visible and documented on the Core-vet system, including the start and expiry date for all 20 individuals;
- the rationale had been recorded for most officers including the two individuals that were refused. For those that did not have a rationale, we noted that the checks completed by the Vetting Team did not uncover any problems and as such a clear decision could be made;
- evidence of nationality and residency checks had been completed for all individuals and mostly took the form of passports, proof of address, and driving licences; and

- evidence of the sponsor was on the Core-vet file for all 20 to support their application. This primarily took the form of an email and often included the applicant's supporting documentation.



New starters are required to undergo either recruitment vetting (RV) or management vetting (MV) depending on their role. We selected a random sample of 10 new starters that joined in the past 12 months consisting of:

- Seven individuals with RV clearance;
- Two individuals with MV clearance; and
- One individual with MV and security check (SC) clearance. SC clearance is a further level of vetting covered under the National Security Vetting and is not completed by the Force.

We confirmed for all 10 individuals that:

- a clear outcome has been recorded on Core-vet alongside any rationale for more complex vetting decisions;
- the current and any past addresses of the applicant has been recorded;
- the appropriate checks had been completed in-line with the required clearance level for the post. This primarily included Police National Computer (PNC) and Police National Database (PND) checks, Experian credit checks and PENTIP checks. For ex-officers, a Centurion report has also been reviewed outlining their previous police history;
- the level of clearance that the officer received matched the level required for their post; and
- there was supporting documentation on file for each check.



There are currently only four volunteers working for the Force over the past 12 months and we have reviewed the vetting for all four to determine whether this has been completed correctly. We confirmed that all four individuals have been vetted, though their level of vetting differs for several reasons. NPPV2 clearance is currently the minimum requirement for all volunteers, and we noted:

- Two volunteers have been vetted by Northumbria Police (as they are currently employed by them) and as such the Force has used this vetting rather than completing this again. Supporting evidence from Northumbria is retained on the Core-vet system. One volunteer has MV and SC clearance which is substantially more than required for volunteers. The other has RV clearance as part of their role with Northumbria which is equivalent to NPPV2 full;
- One individual has NPPV2 full vetting which is the required clearance level; and

The final individual has RV vetting. The Vetting Team Leader confirmed that RV vetting has the same checks as NPPV2 full and as such they are equivalent. The reason for this individual having RV vetting instead of NPPV2 full was that they are an ex-employee of the Force and have been volunteering for a number of years.

At the time, RV vetting was used for volunteers rather than NPPV2 and, given they are equivalent in checks, it was not therefore applicable to re-vet the individual again. In all four cases we verified that the outcome has been clearly recorded alongside the rationale for any decisions and supporting evidence is retained on file.



When conducting our testing of the 20 NPPV clearances, the 10 new joiners and the four volunteers, we reviewed how decisions were made and whether this adhered to the National Decision Model (NDM). We noted that vetting decisions contained a rationale for the decision, where required, for example, in cases where the individual has a previous criminal conviction or vetting has been rejected. From our sample testing, we confirmed that the vetting process carried out by the Force complies with the NDM, as information and intelligence is gathered to assess the threat and risk.



An appeals process has been created in which the Director of Standards and Ethics (an officer independent of the initial vetting decision) decides whether to uphold or reverse the Vetting Team's original decision. The appeals policy has only recently been approved (during the week of the audit) and is currently undergoing implementation. As such, we have conducted testing against the newly implemented policy but with the awareness that older appeals may not fully follow the process outlined within the policy.

We selected five of the 30 appeals conducted in the 2021-22 financial year and, upon review, verified that all five had the refusal letter and appeals letter on file, the Director of Standards and Ethics had made the final decision for all and in four of the five cases, a decision had been made within 28 days of the Force receiving the appeal. In the remaining instance, we noted that it had taken 47 days; however, this was due to the Director requesting an interview with the applicant to discuss the appeal further but the applicant did not respond within the timeframe and thus the appeal was rejected.



Transferees to the Force are required to be re-vetted rather than using their transferring Force's vetting. We selected a sample of five transferees (from a total of 21 transferees in 2022) and confirmed that all five had undergone a full vetting check including a review of their record from the Force they are transferring from. Re-joiners are required to undergo a new, full vetting check if they re-join the Force unless they left less than two months previously in which case a health check would take place instead. We conducted a walkthrough of one of these individuals that had left and re-joined within four weeks. We confirmed that a vetting health check had been conducted for this individual as well as a review of the officer's previous police history.



A process is in place alongside the Complaints and Discipline team within the Department of Standards and Ethics in which officers that have undergone misconduct hearings are subject to a review of vetting. The Head of Information Management explained that all misconduct hearings that have occurred have all seen the removal of the officer and as such the vetting only have to remove the individual's vetting level from the system. We've been provided with a copy of the checklist used by the team that undertake misconduct hearings and confirmed that a section has been included to remind the officer to contact the vetting team to remove the individual's vetting.



Annual vetting appraisals are now only completed for individuals with MV combined with SC clearance following discussions with other forces and review of the APP guidance produced by the College of Policing. Previously, all staff with MV clearance were required to undertake an annual review. As part of our testing of new starters, we selected only one individual with MV and SC clearance and, upon review of their Core-vet record, we confirmed that an annual security review had been scheduled, though this is not due until June 2022. We selected a further sample of 10 individuals with MV and SC clearance (out of 105) and reviewed Core-vet to confirm annual reviews had been undertaken and future reviews were scheduled. Of the 10 individuals:

- nine had received SC clearance in the past 12 months and were therefore not expected to have an annual review. However, we noted that seven of these individuals did have a review and that this was from the historical process when all MV staff were required to have an annual review. As such, the next annual review is scheduled 12 months after that review and, whilst it is not completed on the 12-month anniversary of the SC clearance, it is completed on an annual basis;
- for the one individual that did not receive clearance in the past 12 months, we confirmed that an annual review was on file though did note this had been done at 10 months rather than 12 and is due to the old MV process; and
- all 10 staff members had a future review date scheduled on Core-vet.



Vetting statistics are reported to the Directorate of Standards and Ethics (DSE) Senior Management Team (SMT) meeting each month. We reviewed a copy of the KPI statistics and confirmed the report contains data on vetting performance from July 2021 to February 2022. We noted that these statistics include all new applications received that month and the number of applications currently open. Upon review of the stats, commentary has been provided alongside the data including a section regarding resources and how additional staff are currently being recruited to deal with the current backlog and open applications. We verified that these performance stats are included within the 'performance reporting' section of the DSE SMT agenda. Officer uplift reporting is conducted and provided to the vetting team by HR to ensure they are aware of any future spikes.

2. DETAILED FINDINGS AND ACTIONS

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

Risk: Risk 1724 (SR43)		
Control	<p>The Force are in the final stages of implementing a vetting appeals policy. Whilst the policy is not formally implemented, all recent vetting appeals are managed in accordance with the vetting appeals policy, as the Force have been integrating this process into the appeals system for 2021 / 2022.</p> <p>Vetting appeals are heard by the Director of Standards and Ethics within 28 days who makes the final appeal decision and there is adequate documentation to support this.</p>	Assessment:
		Design ✓
		Compliance ×
Findings / Implications	<p>The Force are in the final stages of creating and developing a vetting appeals policy. The policy was formally approved by the Executive Management Board during the week of the audit and will be added to the Force's policy library repository where all policies are stored. As well as this, the policy will also be uploaded to the Force's website to ensure the public have access to the policy.</p> <p>The Head of Information Management confirmed that the Director of Standards and Ethics has been involved in the creation of the policy as they are an integral part of the appeals process and are a key stakeholder.</p> <p>Whilst the policy has not yet been formally implemented, the Force have been integrating the process into the appeals system and are confident that, for the most part, all appeals completed in the 2021-22 financial year should adhere to the appeals policy.</p> <p>As per the appeals policy, applicants have 28 days to submit and appeal after their vetting has been rejected. The appeal then goes to the Director of Standards and Ethics who reviews the reason for rejection and appeal and determines whether the correct decision has been made or whether it should be reversed, and the applicant receives their vetting outcome. This appeal process should be completed within 28 days of receiving the appeal email from the applicant though this is currently an informal target and is not mentioned to the applicant. This timeframe will be formalised with the introduction of the appeals policy.</p> <p>We selected a sample of five appeals (from a total of 30 appeals including both internal and external applicants) that had been completed within the 2021-22 financial year and walked through the system for each to determine whether they had been completed correctly, whether sufficient evidence was retained on the Core-vet system and whether the appeal review had been conducted in a timely manner.</p> <p>For all five appeals, we confirmed that both the refusal letter (from the Force) and the appeal letter (from the applicant) were saved on Core-vet and that the appeal had been made within 28 days of the refusal correspondence. In all five cases, it was clear that the Director of Standards and Ethics had received, reviewed, and made a decision on the appeal, which we verified against the creation and date of the appeal decision letter for all five applicants.</p>	

We reviewed the date for when the appeal decision letter or email had been sent (which were all on Core-vet) and in four of the five cases, this was within 28 days. In the remaining instance in which the decision was not made until after 28 days, we noted that this was due to the Director of Standards and Ethics contacting the applicant and asking them to meet to conduct an interview. The applicant did not respond to the correspondence and the appeal was denied after 47 days. We note that the 28 days is currently only an informal target and that the Director of Standards and Ethics contacted the applicant within the 28 days, therefore, we have not raised an action as sufficient efforts were made to address the appeal.

The Head of Information Management explained that the appeal process is different if the applicant identifies that they have a protected characteristic which may be relevant to the rejection.

In such instances, the Director of Standards and Ethics would still have final say but they must consult with the Scrutiny Panel. We verified that the process explained matched what has been documented within the vetting appeals policy. Only one instance of this has occurred during the 2021-22 financial year and we reviewed the record on Core-vet to determine whether the process had been adhered to. During the examination of the Core-vet system, we noted evidence of the review by the Director of Standards and Ethics had been completed as well as the rejection letter sent to the applicant. However, whilst the Director of Standards and Ethics had recorded notes from the Scrutiny Panel (as minutes are not taken at these meetings), the notes were retained outside of the Core-vet system, therefore there was not a complete audit trail within the system.

There is a risk that if notes regarding appeal discussions are not held on file, staff may not have the full access to information required to make an informed decision.

Management Action 1	The Force will ensure that notes are taken to reflect the discussion held during the Scrutiny Panel meeting and that these are saved on the Core-vet system	Responsible Owner: Director of Standards and Ethics	Date: 15 May 2022	Priority: Low
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Risk: Risk 1724 (SR43)

Control	All staff with MV clearance and NPPV-3 vetting require a vetting review twice within the lifetime of the vetting. A change in circumstance form is required to be completed by staff if their situation has changed. Staff are reminded of this on a quarterly basis.	Assessment: Design Compliance	✓ x	
Findings / Implications	<p>We met with the Vetting Team Supervisor who explained that for staff with MV and NPPV-3 vetting, a vetting review is scheduled to take place at 28 and 56 months into the vetting lifecycle. We confirmed that this is in line with the APP guidance which states that MV and NPPV-3 vetting requires two checks during the lifetime of the clearance.</p> <p>The Head of Information Management explained that it was identified in late 2021 that the Vetting Team had not been undertaking these periodic reviews and work was started to rectify this. The Vetting Admin Assistant is currently working through all individuals with MV and NPPV-3 clearance to confirm that they have two reviews scheduled in the system. The Admin Assistant is currently at November 2019 and is working back further to populate these review dates. There is a risk that if all individuals with NPPV-3 and MV clearance do not have two vetting reviews scheduled, the Force will be failing to adhere to APP vetting guidance and vetting may not be entirely up to date. As part of our general testing, we selected three NPPV-3 samples and we confirmed in all three instances that vetting review dates had been assigned to the individual. We noted that none of the three individuals selected had had a vetting review yet as the 28-month review was in the future.</p> <p>As part of our testing, we selected 10 random staff members and tested to determine whether their vetting had been completed. Of these 10, three had MV vetting, and we confirmed in all three cases that two vetting reviews had been assigned at 28 and 56 months.</p> <p>The Vetting Team Supervisor walked us through a function of Core-vet which allows staff to identify individuals that have an upcoming vetting review. We confirmed during the walkthrough that staff can view individuals that have an upcoming vetting review and that an individual is assigned each week to review these.</p> <p>We discussed with the Vetting Team Supervisor and the Head of Information Management on how the vetting team are informed of changes in circumstances and how this is actioned if required. They explained that the Directorate of Standards and Ethics work closely with the Vetting Team and inform them of any instances of misconduct hearings including the result. This is reflected in the Core-vet system including reducing the vetting level if required. The Head of Information Management did explain however that all misconduct hearings that they are aware of, have all ended with the individual being removed from the Force and in these instances the vetting level is subsequently removed from the individual.</p> <p>We noted that the DSE have a misconduct checklist which includes (though at the end) a section for informing the Vetting Team of any changes.</p>			
Management Action 2	The Vetting Team will ensure all individuals with MV and NPPV-3 clearance have a 28 and 56 month review scheduled on the Core-vet system and these are completed in a timely manner.	Responsible Owner: Vetting Team Leader	Date: 31 August 2022	Priority: Medium

Risk: Risk 1724 (SR43)

Control	Only staff who require access to the Core-vet system as part of their job role have access.	Assessment:		
	Only staff who are involved in the vetting process have admin access.	Design	✓	
		Compliance	x	
Findings / Implications	We obtained the Force’s list of user access levels applicable to the Core-vet system. From the report provided, we were able to evidence that two levels of access had been attributed amongst the 80 Core-vet users. These access levels constituted restricted access and admin access.			
	Under the restricted level of access, individuals are only granted read only privileges with only key information required such as the level of clearance, the date of clearance and any restrictions. Admin privilege grants full system access while also allowing the member of staff to view all information applicable to the vetting process (such as documentation and the rationale document).			
	From analysis of the document, we noted that 58 individuals have restricted access, and 22 individuals have admin access. We reviewed all 22 individuals with admin access and the Head of Information Management confirmed that they were all currently employed by the Force and require admin access as part of their job role.			
	While we believe that the two access levels to the Core-vet system are appropriate, we were informed by the Head of Information Management that no review of the individuals with either access level is undertaken. Whilst the Head of Information Management informed us that staff with admin access are removed promptly as they are almost all within the vetting team, this may not necessarily be the case for those with restricted privilege who may work outside of the team. Given there is no review of granted permissions completed, there is a risk that inappropriate staff members retain access when there is no business need to do so.			
Management Action 3	The Force will conduct a regular six-month review of access rights within the Core-vet system to determine if users are appropriate and have the correct access level	Responsible Owner: Vetting Team Leader	Date: 31 May 2022	Priority: Low

Risk: Risk 1724 (SR43)

Control	Vetting is required to be renewed by the Vetting Team before the vetting expiry date.	Assessment:	
	Vetting expiry dates differ depending on the vetting level and range from up to three years for NPPV1 to 10 years for MV vetting.	Design	✓
		Compliance	×
Findings / Implications	<p>During discussions with the Head of Information Management and the Vetting Team Supervisor, we were informed that the Force are currently struggling with renewing expired vetting and vetting due to expire. To address this, a resource paper has been created and has recently been approved (end of February 2022) by the Deputy Chief Constable and the Growth Prioritisation Working Group. The agreed solution in the resource paper is 'option two' whereby the Force will renew all expired clearances over a longer time period (potentially up to 10 years), and all clearances due to expire, and will recruit two full-time Vetting Researchers and one part-time Researcher. This solution will take longer than other solutions but is less resource intensive than the other solutions proposed.</p> <p>The other options proposed were:</p> <ul style="list-style-type: none">• Option one: renew all expired clearances in a relatively short period, and all clearances due to expire, by hiring five FTE Vetting Researchers on temporary two-year fixed contracts;• Option three: renew all expired clearances except NPPV1 in a relatively short time period, and all clearances due to expire except NPPV1, which would require four FTE Vetting Researchers on temporary two-year fixed contracts; or• Option four: renew all expired clearances except NPPV1 over a longer time period, and all clearances due to expire except NPPV1. <p>We reviewed a list of all clearances and noted that this supports the discussion held regarding the Force struggling to address expired vetting. We confirmed that there are a large number of individuals that have expired vetting on the system and, upon review, noted that this was approximately 3,920 as of the week of the audit (April 2022). The Head of Information Management and the Vetting Team Supervisor explained that for NPPV vetting, most individuals that have expired vetting no longer require the vetting as they do not work in the role or do not require access to police systems.</p> <p>This finding is supported within the resource paper completed in December 2021 which, upon review, states that expired clearances currently stand at 2,882 individuals (though this has been reduced by 20% by the Force to account for staff or contractors that no longer require their vetting to be renewed) and is comprised of Cleveland Police employees and individuals with NPPV clearance.</p> <p>There is a risk that if the Force does not have adequate resource to address the current demand for vetting clearance and address the backlog of expired clearance, then the vetting demand will continue to grow, which will lead to a substantial number of police officers, staff, and contractors without up-to-date clearance, which could risk inappropriate access to police systems and confidential data.</p> <p>We asked the Head of Information Management whether the Force have any sort of data retention scheme in place for data held on Core-vet. It was explained that there is currently nothing in place; however, discussions are currently underway to implement this feature.</p>		

Using this feature, rejected records will be deleted after a set period of time. There is a risk that if rejected records are kept on file, the Force could be in breach of data protection legislation.

Management Action 4	<p>The Force will ensure that the resources approved as part of the resource paper are recruited to address the backlog of expired vetting and upcoming expiring vetting.</p> <p>The Force will:</p> <ul style="list-style-type: none">• Undertake a reconciliation exercise of the vetting backlog to determine whether vetting requests are still required;• develop an action plan to address the vetting backlog, including prioritisation of vetting requests using a risk-based approach to ensure the backlog is methodically approached; and• provide regular reporting to SMT on the progress in addressing the backlog of vetting requests.	Responsible Owner: Director of Standards and Ethics	Date: 31 August 2022	Priority: High
Management Action 5	<p>Discussions will be undertaken to determine whether the data retention function on Core-vet can be implemented. If it can, then a plan will be created outlining how this will be implemented</p>	Responsible Owner: Vetting Team Leader	Date: 30 September 2022	Priority: Medium

APPENDIX A: CATEGORISATION OF FINDINGS

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

The following table highlights the number and categories of management actions made as a result of this audit.

Risk	Control design not effective*		Non Compliance with controls*		Agreed management actions		
					Low	Medium	High
Risk 1724 (SR43)	0	(11)	4	(11)**	2	2	1
Total					2	2	1

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

** More than one management action has been raised against a given control.

APPENDIX B: SCOPE

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

Objective and risk relevant to the scope of the review

The internal audit assignment has been scoped to provide assurance on how the Police and Crime Commissioner for Cleveland and the Chief Constable of Cleveland manages the following risk:

Objective of the risk under review	Risk relevant to the scope of the review	Risk source
The Force operate a thorough and effective vetting regime in line with the requirements of the APP Vetting (March 2021 and Code of Practice for Vetting (2017).	Risk 1724 (SR43)	Chief Constable strategic risk register

Scope of the review

The APP Vetting, March 2021 and Vetting Code of Practice, October 2017 underpin the vetting process undertaken by the Force and is applicable to employed staff, volunteers and other non-police personnel.

- We will perform sample testing to confirm adherence with APP Vetting for RV (Recruitment Vetting), MV (Management Vetting) and NPPV (Non-Police Personnel Vetting) particularly in relation to:
 - Checkable history and residency requirements / criteria;
 - Minimum level of clearance is in place dependent on the post;
 - Authentication - for a sample of NPPV applications, we will confirm that evidence of prior authentication from a sponsor (or similar) has been sought and that evidence of such authentication is retained; and
 - An appropriate audit trail is maintained on the vetting system.
- Decision making is made in accordance with the National Decision Model and outcomes are recorded on the vetting system.
- An appeals process is in place and adhered to; this will be confirmed through sample testing.
- Review of vetting health checks, required as a minimum, performed on transferees and re-joiners.
- Vetting reviews take place when required and in accordance with the APP Vetting. We will consider how the Force is informed of changes in circumstances e.g misconduct hearing/meeting and the vetting reviews which are undertaken if the decision of misconduct is to issue a written warning or final written warning.

- Annual vetting appraisals are undertaken for management vetting (MV) personnel including those in the Police National Computer (PNC) Bureau.
- Access to the vetting database is restricted only to authorised individuals and access permissions are regularly reviewed for appropriateness.
- Performance measures including but not limited to timelines being met (this will include resourcing capabilities for officer uplifts resulting in large volumes of vetting applications being completed) are reported through the governance structure of the organisation.
- We will use data analytics to confirm that all vetting held on the system is in date at the time of our review for both RV and MV.
- Our testing will consider both Force and OPCC employees as well as contractors and other non-police personnel.

The following limitations apply to the scope of our work:

- We will not validate the accuracy of the decision made but confirm the rationale has been recorded on the vetting system.
- Our work will not guarantee the outcome of HMICFRS inspection.
- We will not consider the process for national security vetting (NSV).
- As the Police and Crime Commissioner does not require vetting this will not form part of our review.
- We will not comment on the appropriateness or outcome of any appeal.
- Testing will be completed on a sample basis, so we will not confirm compliance with all elements of the APP Vetting.
- The results of our work are reliant on the quality and completeness of the information provided to us.
- Our work does not provide any guarantee against material errors, loss or fraud, or provide an absolute assurance that material error; loss or fraud does not exist.

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Last evidence received	3 May 2022
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Distribution	Temporary Chief Constable Head of Information Management

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