



Pre-Employment Checks and Vetting Review

Author: Northamptonshire Police
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Background and Purpose

This report seeks to provide a review of the pre-employment checks and subsequent vetting of Nick Adderley (NA) following the misconduct findings against the former Northamptonshire Chief Constable (CC).

It will provide an overview of identified failings in relation to both the pre-employment checks and vetting of NA. The purpose is to improve process, it is not a reinvestigation or further investigation of any misconduct or criminal matters relating to NA, which sit rightly outside of the organisation.

The report will provide reassurance as to the qualifications and the vetting of the current Northamptonshire Police Chief Officer Team and the wider Chief Superintendent and staff equivalent senior leadership team.

Finally, the report will provide recommendations to ensure as far as possible that identified failings are not repeated and that internal and joint processes relating to pre-employment checks and vetting are robust and effective.

Recruitment and pre-employment Checks for former Chief Constable Nick Adderley

In the summer of 2018, the PCC's office (now the PFCC's office) ran a recruitment campaign for the role of Chief Constable of Northamptonshire Police. This was led by the Chief Executive of the PCC's office at the time. The first stage of the recruitment process was a paper sift which required the submission of a CV and an application form. This was followed by three panels:

- Staff panel to provide police officers and staff the opportunity to speak with candidates.
- Local Stakeholder Panel to allow partners within the county to ask questions.
- Technical panel for assurance around policing skills.

The final stage was an interview with the PCC, the Chief Fire Officer, and the CEO of the local council.

The application form for the role required details of education. However, no written application form for NA has retained/can be located therefore details of qualifications declared on the form cannot be verified. A copy of the CV submitted by NA at paper sift stage has been recovered. This listed the following educational attainments:

- 2009 – 2011: Master's degree in criminology and Police Leadership, Cambridge University.
- 1982 – 1986: Britannia Royal Naval College, Royal Naval School of Engineering, Officer Programme.

NA passed the written application section and was then subject to the three panels and final interview, at which he was successful. No full record of interview questions/answers has been located.

It has now been established, via the public Gross Misconduct Hearing, that NA did not attend the officer programme at the Royal Naval College.

With regards to the master's degree. At the point NA was selected as the preferred candidate MFSS (Multi Force Shared Services – no longer in use) took over the pre-employment checks. Pre employment checks are done prior to any final job offer and are not part of the vetting process.

Vetting APP Section 7.1 Authentication

7.1.3 *It is the responsibility of human resources (HR), the employer or other internal sponsor to ensure that authentication takes place and is fully audited before vetting forms are forwarded to the Force Vetting Unit. The authentication process comprises four stages, and the information collected should be reviewed and assessed between each stage. The stages should be carried out in the order shown below:*

- *identity check*
- *nationality check*
- *employment eligibility*
- *checkable history*

Employment eligibility checks would include any pre-requisites to the role such as health/fitness, continuous service, and necessary qualifications.

MFSS have no record of checking or verifying the master's degree and no degree certificate was scanned/retained/can be located at this time. On the 30 July 2018 MFSS sent a letter to NA listing outstanding documents which included items such as signed T&Cs and P45s, but evidence of the degree was not asked for at this stage. It may be/is likely that because the Master's degree in criminology listed was not needed for the role this was not verified. Due to a lack of detailed records from MFSS we cannot be certain.

As an organisation we have now moved away from MFSS and have bought our transactional HR function back in house. Recruitment for all external candidates up to and including Deputy Chief Constable is done via the OLEO (HR) system. All qualifications required for a role have to be produced by the applicant either by uploading onto the OLEO or email to the recruitment team for verification prior to job offers being made. The Chief Constable process differs in that applications are not made through Northamptonshire Police/OLEO system. However, it is sensible that any future CC recruitment campaign would utilise our current inhouse HR team/processes and therefore this verification process would be applicable.

Timeline of Vetting for former Chief Constable Nick Adderley

July 2018 –Staffordshire Police sent Developed Vetting (DV) documents for NA to Northamptonshire Police in readiness for his transfer to Northamptonshire/promotion. These were viewed by the Vetting Team Leader who informed the PCC that “all is in order” and proof of DV vetting had been received. The DV certificate showed DV clearance from 23 February 2017 – 23 February 2024. Vetting was cleared on this basis.

(NA gave his military history on his DV forms as Royal Navy, Able Seaman, October 1984 – 1987. We now know that this is incorrect, but this does not seem to have been identified throughout DV process at the time).

DV vetting is underpinned by Management Vetting (MV) and DV should not be cleared for anyone who is not already MV cleared. This is now in official Authorised Professional Practice (APP), which at the time of the original DV was not in place, however the principle of the higher vetting being underpinned by MV was in practice. (APP came into practice in October 2017).

Vetting APP Section 9.1 NSV levels (National Security Vetting).

9.1.3 *Where a person requires SC, or DV clearance, they must also have MV. The relevant level of force vetting must be cleared before starting NSV clearance, although operational timescales may mean that NSV clearance is initiated before force clearance is granted.*

There is no mention of Management Vetting (MV) at the time of transfer on Northamptonshire systems. There is no record of MV vetting documents being sent to us from Staffordshire and we did not complete new MV vetting when he transferred across in 2018. There is a strong inference that due to NA holding DV level vetting he must have already been MV cleared.

2018 – 2022 – NA continued in his career as CC with DV vetting clearance but no record of MV clearance.

Dec 2022 - NA submitted leavers forms upon retirement.

Feb 2023 – NA completed the MV vetting forms in order to return as CC. On this form NA stated that he served in Royal Navy from 1981 – 1991, rank was not mentioned.

One of the checks that form part of the MV process is the HM Forces check. The candidate is asked to declare if they have served with HM Forces and if so give details of service number, dates, and rank. This then prompts a HM Forces check. On the 2023 MV form NA omitted to add the detail required, he left out his rank and service number. This was not identified at the time and no follow up question/enquiry made.

During the 2023 vetting process no HM Forces check was completed for NA. Such a check should provide disciplinary records and any adverse intelligence held. It does not as a matter of course provide dates of service. Since these dates are requested on the MV form it would

be easy to ask the direct question. The Vetting Team have now introduced a pro forma for HM Forces to ensure responses are comprehensive and provide dates of service.

April 2023 – MV cleared.

During the review it was found that The National Security Vetting Service (NSVS) held no full record of NA's DV vetting. NSVS report that they moved from paper to electronic files in the months after NA was DV cleared and do not appear to have completed back record conversions. The paper DV file sent from Northamptonshire by Staffordshire has now been sent to NSVS for their records/verification. We do not know at this stage what MV was in place prior to DV clearance. NSVS do not have files to assist with this. It is acknowledged that NSVS systems are now electronic. However, there is little guidance re DV in the Vetting APP as it is not a police process, and it does appear that there may be a less than joined up approach between the MV and DV processes.

Current Chief Officer Team

Since Monday 24 June up to date checks have been completed to ensure all members of the current Chief Officer Team and the wider senior leadership of Chief Superintendents/Staff equivalents hold correct vetting. All Chief Officers/senior leaders should be vetted to MV level. All police officers have in date MV vetting status. Four of the senior officer staff members have current MV vetting. Two staff officers are currently vetted to Recruitment Vetting level (RV) but are in the process of completing MV.

The current Acting Chief Constable and Temporary Deputy Chief Constable have MV and DV clearance.

Of note, none of the current Chief Officers/senior leaders has declared any previous military history.

Checks have also been completed to ensure that minimum qualifications relevant to each role have been produced and uploaded onto HR files. All Chief Officers/Senior leaders have the requisite qualifications for their specific roles.

All officers/staff that have listed a degree, regardless of relevancy, have been asked to produce the certificate. All of those declaring degrees over and above minimum requirements have produced a qualifying certificate with the exception of one and a request has been made to the relevant university to obtain proof/verify.

During the review process it was identified that application forms for recruits/transferees are not retained beyond a 12-month period by Northamptonshire Police. This made the process of verifying information declared difficult. The necessity to retain application details beyond 12 months should be considered.

Recommendations

Recommendation 1

Process for utilising current police HR systems for pre-employment checks to be built into all Chief Constable recruitment processes.

Recommendation 2

Retention period of application forms and pre-employment check information to be reviewed with a view to extending current 12-month retention period.

Recommendation 3

A proportionate pre-employment qualification check policy to be implemented as follows:

- All required/minimum qualifications for a role will be verified and uploaded to OLEO in line with current practice to ensure a clear and retrievable record.
- Any candidate that volunteers a qualification of degree level or above will be required to produce evidence/certificate of qualification for recording on HR regardless of relevancy to role.

Recommendation 4

Current APP allows forces to accept vetting documents and clearance from other force areas for transferees if the vetting is less than 12 months old. Northamptonshire Police will go beyond vetting APP and all transferees will be subject to fresh vetting (RV and MV) regardless of rank. This will ensure full accountability.

Recommendation 5

Dip sampling of vetting files to be conducted by new dedicated Force Vetting Manager for reporting at regular performance meetings. This will ensure qualitative as well as quantitative oversight. To include completion of all relevant checks and follow up enquiries where information is incomplete.

Recommendation 6

Adoption of pro forma to ensure comprehensive responses to HM Forces checks to include: Dates served/Ranks Held/Service Number/Complaints/Disciplinary Record/Additional adverse information. In place from July 2024.

Recommendation 7

The relationship between MV and DV needs exploration/clarification. In respect of NA, it is not known what information was provided to NSVS by Staffordshire prior to DV clearance. We therefore cannot say with any certainty that with greater information sharing anomalies would have been identified. However, at this time DV sits outside of Authorised Professional Practice but is reliant upon MV. It would therefore follow that information sharing and cross referencing would be a sensible safeguard within the vetting hierarchy. There does not appear to be a clear process for this.

Recommendation 8

Enquiries with Staffordshire Force Vetting Manager to be conducted to ascertain what vetting status was held by NA at point of transfer and point of DV clearance in order to understand gaps in information held by Northamptonshire. If any further anomalies are identified these will be passed to Staffordshire/PFCC's office to ensure enquiries do not go beyond review/scoping.

