

## **IL/AV 101-18**

Sonia Crozier, Executive Director  
Probation and Women  
HMPPS

*(By email – no hard copy to follow)*

17 August 2018

Dear Sonia,

### **Implementation of ViSOR vetting**

You will recall the strong representations that the Unions made to you at the recent 'Stocktake' meeting, following feedback from our members about the impact of the E3 driven decision to extend ViSOR access to all NPS Offender Managers.

We have regularly raised this issue at a number of Trade Union Engagement meetings, and whilst I acknowledge your efforts in commissioning another discussion between the Unions and your policy leads earlier this month, this unfortunately did nothing to assuage our serious concerns.

It is therefore with some regret that I have to register a formal trade dispute with HMPPS over the current vetting policy for ViSOR. This is essentially because while we obviously support the need to improve information sharing and the objective of achieving more effective community safety protocols, Napo maintain that the employer has abrogated its responsibility for the welfare and protection of its staff against the already obvious detriments that have occurred and will in the future.

Napo continues to maintain that no individual staff member should suffer from the stigma of having failed a Vetting process that we have severe reservations about in a number of areas. These include (but this list is by no means exhaustive):

- The inconsistency in application forms and the information required together with its intrusiveness
- The use to which the information is put by the receiving Police force
- Where the information is stored and for how long and whether it is shared elsewhere
- Major concerns about a number of equality related issues including the apparent absence of any overarching Equality Impact Assessment
- The potential impact on staff who have a declared a protected characteristic

- Inadequate advice to staff about how they should deal with the by now frequent discord between the Vetting Applicant and other parties on whom they are expected to disclose sensitive information
- Whether the ViSOR vetting process is GDPR compliant or evidence of this being the case
- The lack of clear advice from Divisional leaders (some of whom as Napo members) are also expressing disquiet at the current situation.
- A distinct lack of trust in the integrity of some local Police Forces by some staff given some historical but well documented cases of negligent activity.

In light of the foregoing, it will come as no surprise to you that Napo and UNISON are seeking legal advice and will also be approaching the Information Commissioners Office around the data related issues. I also understand that UNISON are currently considering their position in respect of registering a trade dispute.

### **The way forward**

Throughout our discussions with your Officials, Napo has maintained that short of a disciplinary situation having been identified, there is absolutely no reason why reasonable adjustments cannot be put in place to avoid widespread disruption amongst established staff whose careers will be blighted by a failure to pass the vetting process. One where critical decisions are made by unaccountable individuals based on inconsistent information without any serious means of those decisions being challengeable.

I am receiving a multitude of enquiries from angry and/or seriously worried members including newly qualified staff who already see the prospect of embarking on a varied career path effectively ended. These also include the not unreasonable question that if an Offender Manager has access to the Courts and the HMP estate why does the provision of access to information (that is just as confidential than that which they regularly handle) make them somehow more likely to be corrupted?

I will be considering the advice we have commissioned and will be taking a further steer from Napo's Leadership Group as to the next steps. I cannot understand why we are fast approaching the need to move towards an Industrial situation when the solution to the current impasse is quite obvious.

As always, Napo remains willing to meet with you and senior colleagues urgently with the aim of achieving a negotiated outcome, but sadly the response to our representations from those we have met with thus far do not inspire confidence that this will be possible.

Yours sincerely



**IAN LAWRENCE**  
**General Secretary**