Welsh Government Vetting Policy

October 2026

Llywodraeth Cymru
Welsh Government

WHO IS THIS POLICY FOR?
This policy is for anyone who works for the Welsh Government whether permanent, temporary, contractor, secondee or placement.

WHAT IS THIS POLICY ABOUT?
This policy is about the process for undertaking background checks on people before they come to work for the Welsh Government and for those who move to a role where a risk assessment has identified a requirement for a higher level of clearance.

Policy Owner: Kathryn Jenkins, Chief Security Officer

Contacts: [redacted]

Related Policies: Security Policy

Publication: this policy is located on the Welsh Government Intranet at: Pre-employment checks and security vetting (sharepoint.com)

Release Notes:

February 2014	Version 1.0	Published
June 2019	Version 1.1	Updates for currency and clarity on requirements for DBS checks
August 2019	version 1.2	Replaced [redacted]
June 2020	Version 1.3	Rewording of some areas for clarity and update intranet links
June 2021	Version 1.3.1	Updated intranet links
February 2024	Version 1.4	Change of appeals officer position, [redacted]
April 2025	Version 2.0	Re-drafted to incorporate previous standalone documents e.g. which roles require which level of vetting, transfers
December 2025	Version 2.1	Changes to DBS and NSV procedures

Owner: Kathryn Jenkins
Issue number: 2.3
Review date: October 2026
Next review date: October 2026

March 2026	Version 2.2	Change to NSV procedure [redacted]
October 2026	Version 2.3	Added reference to checks when employees are appointed as a director of an organisation or company.

1. What is vetting and why do we need it?

1.1 People working for the Welsh Government come into contact with sensitive information as everyone has access to our buildings and/or IT. Vetting ensures that we employ individuals who have the right to work, with the honesty and integrity required for working within and/or for the government.

1.2 Welsh Government is required to follow a standard approach to vetting which is a reserved matter. It is UK Government policy that the vetting process is applied fairly and sensitively. All vetting candidates are treated equally, irrespective of their gender, marital status, age, race, ethnic origin, religion or belief, sexual orientation or disability.

2. Who needs to be vetted and when?

2.1 Everyone who is employed by the Welsh Government, who has a building pass or access to Welsh Government IT equipment must be security vetted before they can begin to work here. As a minimum, the **Baseline Personnel Security Standard (BPSS)** check is required (see Annex A for more information). BPSS comprises 4 main checks:

- Identity
- Right to work in the UK
- Employment history (previous 3 years)
- Criminal record (unspent convictions) via a basic Disclosure and Barring Service (DBS) check

2.2 Enhanced DBS checks are required for those who work in a **regulated activity** (e.g. Care Inspectorate Wales, Health Inspectorate Wales) who have **unsupervised** contact with vulnerable adults and children e.g. parents or teachers are not present. Note: having access to data about children or vulnerable adults does not require an enhanced DBS check.

2.3 [redacted]

2.4 [redacted]

[redacted]

2.5 [redacted]

2.6. [redacted]

2.7 [redacted]

2.8 [redacted]

2.9 Overseas staff are required to have an equivalent check to the Baseline Personnel Security Standard.

2.10 No one is obliged to be subject to security vetting. However, the occupation of a Welsh Government post or access to IT devices or a building pass is contingent upon it.

2.11 If a higher level of clearance for any post is required (see Annex A), then the appropriate level of **National Security Vetting** will be carried out before the recruitment process completes. This will also be carried out at any point subsequently when required by changes in duties or responsibilities. Individuals will be advised if they need to undergo National Security Vetting.

2.12 An application for National Security Vetting can be made once:
(i) National Security Vetting nationality and residency eligibility checks; and
(ii) identity and right to work checks (as part of the BPSS check) are complete. These checks form part of a process and automatically follow on from each another.

2.13 For Welsh Government staff and contractors a new Basic DBS check must be initiated prior to National Security Vetting (and completed prior to National Security Vetting being granted) [redacted]

2.14 [redacted]

2.15 [redacted]

2.16 There may be occasions where it is necessary or appropriate for a Welsh Government employee to be appointed as a director of an organisation or company. To meet Companies House requirements, the individual must not have any unspent convictions relating to fraud or dishonesty. Such appointments are subject to additional pre-appointment checks, including verification of identity, a Basic DBS check and a disqualified company directors check.

2.17 When the Welsh Government sponsors National Security Vetting applications for third parties a new identity and right to work check must be completed and a Basic DBS check initiated before the application can be sponsored. The Basic DBS check must be completed before National Security Vetting is granted.

3. What happens during the vetting process?

3.1 'Security Questionnaires' requiring a range of personal information must be completed.

3.2 Any attempt to hide or provide misleading information during the vetting process could be taken as evidence of unreliability/dishonesty and may affect the clearance decision.

3.3 Forms must be completed promptly. Failure to complete the forms may result in the cancellation of the vetting application and incur additional costs.

3.4 Vetting outcomes will be shared with the line manager / contract manager although it will not always be possible to disclose the reason for unsuccessful applications.

4. [redacted]

4.1 [redacted]

4.2 [redacted]

4.3 [redacted]

4.4 [redacted]

[redacted]

4.5 [redacted]

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5. [redacted]

5.1 [redacted]

5.2 [redacted]

5.3 [redacted]

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6. Your responsibility as a line manager / contract manager

6.1 You must ensure that the application for vetting provides sufficient time for the process to complete.

6.2 You must ensure that forms are returned at the earliest opportunity. Failure to complete the forms may result in the cancellation of vetting applications and incur additional costs.

6.3 You must report any concerns about staff members to the Chief Security Officer e.g. lifestyle changes that could affect vetting e.g. alcohol related issues, gambling.

6.4 You must ensure that vetting requirements for the post are clearly stated throughout the recruitment. Where the successful candidate does not already hold the required vetting level, the post will be offered on a conditional basis.

6.5 You must inform the Shared Service Helpdesk of any security clearance requirements over and above the normal BPSS checks that are carried out for all new recruits.

6.6 You must wait for HR to confirm in writing that all staff (including contractors and student placements) have completed the BPSS checks before they start their employment.

6.7 You must not make holding a certain level of clearance a pre-requisite of a post.

7. Your responsibilities as a Welsh Government employee / contractor

7.1 You must not sign in anyone as a visitor while they are awaiting security clearance [redacted]

7.2 You must not sign in anyone as a visitor as a way of avoiding the vetting process.

8. Criminal offences

8.1 No National Security Vetting application is turned down automatically because the applicant has a criminal record. However, failing to declare a criminal conviction as part of an application calls into doubt the honesty, integrity and credibility of the candidate and may well impact upon the vetting outcome.

8.2 Subsequent arrest, caution, charge or conviction must be reported to the relevant HR Business Partner. If National Security Vetting is held, it must also be reported to the Chief Security Office.

9. Vetting Appeals Procedure

9.1 All persons whose vetting checks are unsuccessful have a right to have their case reviewed.

9.2 If an applicant wishes to appeal against a decision to refuse security clearance at any level, they should write formally in the first instance to the Director, People and Places (Appeals Officer) explaining the reason for the appeal. The Appeals Officer will initially ask the Chief Security Officer to reconsider their decision based on the information provided in the appeal letter. If the Chief Security Officer does not change their decision, the appeals officer will then consider the appeal and determine whether the appeal is successful.

POLICY ENDS

Annex A

Vetting Levels

We carry out checks at the Baseline Personnel Security Standard (BPSS) for all personnel engaged with or employed by the Welsh Government, including permanent, casual staff, contractors and consultants if they have access to building passes or IT equipment.

Any tenant who holds a building pass is required to hold a Disclosure and Barring Service (DBS) certificate [redacted]. Tenant organisations are responsible for completing their own DBS checks.

There are a number of levels of security vetting depending on the role that a member of staff will be undertaking. Note: BPSS is not a National Security Vetting level but a basic onboarding check. The levels of personnel security controls are:

Baseline Personnel Security Standard (BPSS) - for all personnel engaged with or employed by the Welsh Government including permanent, casual staff, placements, contractors and consultants with building passes or access to IT equipment. BPSS checks are completed prior to the processing of any National Security Vetting application. BPSS comprises 4 main checks:

i. **Identity** – the individual is who they say that they are. Three forms of ID documents are required to complete the check. Identity checks can take place in person or virtually (via a Teams video call). If virtual checks are completed, the checker must have the original documents in front of them during the Teams call. ID documents will be returned to applicants by the end of the following work day after the Teams call via a 'track and trace' postal service.

   Identity checks (vetting clinics) are not repeated during someone's employment where they hold National Security Vetting or where there is a record that a BPSS check was completed. Should it be necessary for a staff member (for whom there is a record of a check) to provide ID documents e.g. for a National Security Vetting Check, then copies are accepted.

ii. **Right to work in the UK**

iii. **Employment history (previous 3 years)**

iv. **Criminal record (unspent convictions)** via a basic Disclosure and Barring Service (DBS) check. If an individual has resided in the UK for less than 3 years, they are required to obtain a criminal records check for time spent overseas. Welsh Government does not re-imburse any costs incurred in obtaining the check e.g. travel costs to an Embassy.

   DBS checks will be undertaken for existing staff when their contract changes e.g. new job and there is no previous record of a completed check.

   Staff who have been away from the organisation for 12 months or more e.g. secondment, parental leave, unpaid leave are required to complete a basic DBS check on their return.

Enhanced Disclosure and Barring Service (DBS) checks are required for those who work in a **regulated activity** (e.g. Care Inspectorate Wales, Health Inspectorate Wales) who have **unsupervised** contact with vulnerable adults and children e.g. a parents or teachers are not present. Note: having access to data about children or vulnerable adults does not require the enhanced DBS check. Enhanced DBS checks are renewed every 3 years.

National Security Vetting

[redacted]

All costs are paid from the line manager's or project manager's budget.

BPSS checks must be completed before National Security Vetting checks commence.



