



Meeting	SPA Complaints and Conduct Committee
Date	01 June 2023
Location	Video Conference
Title of Paper	Police Scotland Vetting Overview
Presented By	Assistant Chief Constable Alan Speirs, Professionalism and Assurance
Recommendation to Members	For Discussion
Appendix Attached	No

PURPOSE

The purpose of this paper is to provide the SPA Complaints and Conduct Committee with an overview of the recent developments and improvements to processes within Police Scotland's vetting department.

Members are invited to discuss the contents of this paper.

1. BACKGROUND

- 1.1 When an individual applies to join Police Scotland in any role, relevant background checks are conducted by the Force Vetting Unit (FVU). These checks involve researching a wide range of information on the applicant and also includes information in relation to third parties and associates of applicants.
- 1.2 A thorough and effective vetting process is a key component in assessing an individual's honesty and integrity. By identifying those who might pose a risk, vetting acts to prevent crime or harm and to protect members of the public against improper conduct by people working for, on behalf of, or in partnership with the Scottish Police Authority (SPA) or Police Scotland. The process reassures the public that appropriate checks are conducted on individuals in positions of trust and supports public confidence. It also ensures there are no conflicts of interest which could adversely impact the ability of the individual to discharge their policing duties effectively and impartially.
- 1.3 There are a number of vetting types which reflect the requirements of different roles:

Recruitment Vetting (RV) – Minimum requirement for all police officers, special constables and police staff. Checks are undertaken on the applicant, their family members and associates and includes social media checks.

Management Vetting (MV) – Higher level of vetting required for those in 'designated posts'. These are posts with access to sensitive information, intelligence, financial or operational assets. Checks are undertaken as per RV but includes enhanced financial checks and suitability references from current and previous line managers.

National Security Vetting – For posts which require access to classified information or assets - Counter-Terrorist Check (CTC), Security Check (SC) and Developed Vetting (DV) levels.

Non-Police Personnel Vetting (NPPV) and Supplier Vetting – Vetting is undertaken on individual contractors and companies who wish to work in partnership with Police Scotland.

In calendar year 2022 Police Scotlands Vetting Department progressed 6172 vetting applications. This consisted of 1728 RV applications, 713 MV applications, 400 NSV applications, 2090 NPPV applications and 1241 Company Directors applications. In total 490 applications were refused across all groups.

2. VETTING – AN OVERVIEW

2.1 Vetting is undertaken in line with the Police Scotland Vetting Manual of Guidance, which is largely mirrored on the College of Policing’s Authorised Professional Practice (APP) and Code of Conduct for vetting in England and Wales.

2.2 Risk based approach

The vetting process is fair and proportionate in that thorough and careful consideration is given to whether any risks can be managed or not in respect of granting clearance. The degree of proximity with family members and associates will be a consideration however there may be occasions where the risk of reputational damage and negative impact on public confidence through association cannot be managed.

2.3 Vetting is by its very nature, an intrusive process. In order to ensure vetting officers are equipped to carefully consider a varied and diverse range of issues they may encounter, we have invested in training to ensure that they are culturally aware and treat each applicant’s circumstances individually and sensitively.

2.4 Enhancements to vetting

Over the last 12 months, Police Scotland has refined its approach and added additional safeguards to the vetting process. Recognising the fundamental role vetting plays in keeping the public safe, we have also enhanced capacity within in our vetting department, ensuring we keep abreast of growing demand whilst continuing to develop and grow processes, benchmarking and learning from outcomes from other police forces.

2.5 In 2021, Police Scotland introduced an additional process specifically for police officers. Prior to taking their oath of office to become probationary constables, a re-affirmation process is now in place to ensure any changes in personal circumstances since the individual was initially vetted are declared and risk assessed, providing an assurance as to continued suitability to hold vetting clearance. If an individual is not deemed suitable to become a police officer, steps are taken immediately to remove the individual’s vetting and their offer of appointment. Since its introduction, 84 individuals have declared a change in circumstance with 3 individuals having failed vetting as a result and their vetting and offers of appointment subsequently withdrawn.

2.6 Police Scotland has reviewed its tolerance levels in respect of areas of risk such as finances and associations and have taken on board improvements and recommendations arising from the HMICFRS Inspection into Vetting, Conduct and Misogyny in police forces in England and Wales.

2.7 Challenges

Risks will change depending on a number of societal factors however current main themes in vetting refusals are:

- **Honesty/integrity issues** – Rightly, the public expects the highest levels of honesty and integrity from all applicants who wish to work within policing. We therefore take a very serious view of those who do not fully disclose relevant information during the vetting process.
- **Criminality** – Personal conduct of applicants is also a fundamental consideration. There are criminal convictions which will not be accepted by Police Scotland, regardless of their age. We are currently developing a criminal conviction framework which will set out and make clear to applicants which convictions will never be accepted in order to manage expectations.
- **Finances** – Individuals who have had or are currently experiencing financial difficulties are more susceptible to financial inducement/coercion. As a result, we have reviewed our processes in respect of financial circumstances prior to awarding a vetting clearance. Applicants who have an undischarged Trust Deed shall be refused vetting on the basis that they have not yet demonstrated financial stability. This will also be the case for applicants who have discharged a Trust Deed but less than 12 months have passed since the date of discharge.
- **Third party associations** – Individuals with ties to organised crime groups or individuals who are involved in criminality can bring operational and reputational risks to the organisation. There is a risk of infiltration or the potential employees may be susceptible to blackmail or coercion by their criminal associates, putting information, individuals and assets at risk.

2.8 Case Studies

The following are case studies from the previous 12 months where vetting has been refused;

- B applied to join Police Scotland as a police officer. B had no previous convictions or any pending matters, nor were there any third party associations of concern. On review of social media accounts, posts were found suggesting that B disagreed with

diversity and inclusion; in fact, some of B's posts could have been construed as racist.

- S applied to join Police Scotland as a police officer. S had no adverse findings, however was closely associated with an individual, C, who, intelligence suggested, was well known for supplying Class A drugs to vulnerable children within the community. The intelligence was recent and credible. S did not disclose an association to C, leading the vetting department to question the integrity of S as it was assessed it was more likely than not S would be aware of C's involvement in the supply of controlled drugs.
- M was applying to join Police Scotland as a police staff member. M was in a trust deed which had commenced in 2019. M appeared to be on track and meeting obligations under the trust deed, however upon conducting a deeper financial check, it showed that M had 3 further defaults since 2019 suggesting M was still financially vulnerable. M's vetting was refused on the basis that M had not demonstrated financial stability and that the risk of financial inducement was high.

3. NEXT STEPS

- 3.1 Having recently undergone an inspection of vetting by His Majesty's Inspectorate of Constabulary in Scotland, Police Scotland await the outcome and any recommendations for improvements.

In the meantime, Police Scotland are progressing a number of initiatives to improve vetting and public confidence within policing;

3.2 **Review/update of designated posts list**

A review of all posts contained on the organisations designated posts list is due to commence. Designated posts are those posts with access to sensitive information, intelligence, financial or operational assets. Assets might include certain IT systems and entry to sensitive police premises may be a consideration. This will be a significant undertaking but will ensure that all posts are updated in accordance with Force policy and staff are accessing information appropriate to their role and level of vetting.

3.3 **Recruitment vetting renewals**

Police Scotland is introducing a process for renewals of Recruitment Vetting (RV) across the workforce.

3.4 Continuous Integrity Screening

In January 2023, Deputy Chief Constable Professionalism, Strategy and Engagement announced that Police Scotland would check all officers and staff against national systems, in line with work being taken forward in England and Wales at the request of the Home Secretary. This work is currently ongoing.

4. PERSONNEL IMPLICATION

4.1 *In respect of the recruitment vetting renewals process, consultation is ongoing with Trade Unions representatives, the Scottish Police Federation and the Association of Scottish Police Superintendents (ASPS).*

RECOMMENDATIONS

Members are invited to discuss the content of this paper.