



Meeting	Complaints and Conduct Committee
Date	4 September 2025
Location	Video Conference
Title of Paper	HMICS Assurance Review of Vetting – Progress Update
Presented By	ACC Lynn Ratcliff
Recommendation to Members	For Discussion
Appendix Attached	Yes: Appendix A - HMICS Assurance Review of Vetting: Recommendations, Management Responses and Actions

PURPOSE

The purpose of this paper is to furnish the SPA Complaints and Conduct Committee with a progress update on the discharge of the 2023 HMICS Assurance Review of Vetting Policy and Procedures within Police Scotland report, published on 3 October 2023.

Members are invited to discuss the contents of this paper and attached appendix.

1. BACKGROUND

- 1.1 On 3 October 2023, His Majesty's Inspectorate of Constabulary in Scotland (HMICS) published a report following an 'Assurance review of vetting policy and procedures within Police Scotland'.
- 1.2 The report contains 15 recommendations and identifies areas for development to improve Police Scotland's vetting of its officers and staff and subsequent identification and management of risk.
- 1.3 HMICS considered the history of vetting in Scotland in the years prior to the creation of Police Scotland in 2013. It reviewed vetting case files of officers and staff over a 4 year period between 2019 and 2022 as well as examining guidance and policy which currently provide the basis for vetting in Police Scotland.
- 1.4 Since publication of this report the Police Scotland Force Vetting Unit (FVU) have been working towards discharging all 15 recommendations.
- 1.5 As per the date of submission of this report the FVU have successfully discharged 6 of the 15 recommendations. Work is ongoing into all 9 additional recommendations.

2. RECOMMENDATIONS, RESPONSES & ACTIONS

- 2.1 The HMICS Recommendations and Police Scotland's Management Responses & Actions are attached as Appendix A.

3. FINANCIAL IMPLICATIONS

- 3.1 The recommendations are being progressed within the FVU alongside business-as-usual commitments. There are no additional financial implications at this time.

4. PERSONNEL IMPLICATIONS

- 4.1 There are no personnel implications in this report.

5. LEGAL IMPLICATIONS

- 5.1 Of the remaining 9 recommendations, 3 require implementation of the Police (Ethics, Conduct & Scrutiny) Scotland Act 2025 (PECSS). This Act covers a range of topics related to ethics, conduct and vetting for policing in Scotland. There is no definitive date for commencement of the 'vetting aspects' of the PECSS Act however

the Scottish Government have indicated it should be before the next Scottish General Election (May 2026).

- 5.2 The FVU have a dedicated solicitor within Legal Services who is assisting to navigate all legal matters. To date the Force Vetting Unit have sought legal advice regards Recommendations 1, 3, 9 and 11.
- 5.3 For the purposes of this report to the SPA Complaints and Conduct Committee, there is no specific legal implication requirement to be documented.

6. REPUTATIONAL IMPLICATIONS

- 6.1 There are no specific reputational implications in this report however successful discharge of all recommendations will serve to positively impact on Police Scotland's reputation with the public.

7. SOCIAL IMPLICATIONS

- 7.1 There are no social implications in this report.

8. COMMUNITY IMPACT

- 8.1 There are no community implications in this report.

9. EQUALITIES IMPLICATIONS

- 9.1 There are no specific equalities implications in this report however the FVU have completed a bespoke Equality and Human Rights Impact Assessment (EqHRIA) aligned to Recommendation 3.
- 9.2 In addition, the FVU have completed an EqHRIA for the vetting aspects of the PECSS Act 2025 and a separate EqHRIA for the Authorised Professional Practice – Standard Operating Procedure (document as explained within 'Appendix A').

10. ENVIRONMENT IMPLICATIONS

- 10.1 There are no environmental implications in this report.

RECOMMENDATIONS

Members are invited to discuss the contents of this paper and attached appendix.

Appendix A - HMICS Assurance of Vetting – Recommendations, Management Response and Actions

No.	Recommendation
1	The Scottish Government should place into legislation the requirement for all Police Scotland officers and staff to obtain and maintain a minimum standard of vetting clearance and the provision for the Chief Constable to dispense with the service of an officer or staff member who cannot maintain suitable vetting.
<p>Management Response and Actions</p> <p>The Police (Ethics, Conduct & Scrutiny) Scotland Act 2025 (PECSS) was introduced as a Bill to the Scottish Parliament on 06 June 2023. The final Act was passed by the Scottish Parliament on 15 January 2025, receiving Royal Assent on 4th March 2025.</p> <p>There are two main provisions within PECSS specific to vetting:</p> <ol style="list-style-type: none">1. Establishment of 'Vetting Regulations' for Police Officers.2. Establishment of a 'Code of Practice' for vetting in Scotland for Police Officer and Police Staff. <p>The Act, Vetting Regulations and Code of Practice will provide a legislative framework for all Police Officers (including Special Police Constables) and Police Staff (including the SPA) to maintain a minimum standard of Recruitment Vetting (RV) clearance throughout their career and should this minimum vetting level not be maintained then legislative provision now exists for dismissal of the Police Officer and Police Staff member.</p> <p>In support of the PECSS Act vetting aspects commencing, The Force Vetting Unit are in the process of developing an Authorised Professional Practice – Standard Operating Procedure (APP-SOP). This document will replace the current Vetting 'Manual of Guidance' and will be ready for implementation as soon as the PECSS Act commences.</p>	

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The APP – SOP will largely align with the College of Policing APP, bringing a broadly National vetting standard across the UK.

Target Date

Ongoing but will be discharged as soon as the vetting aspect of the PECSS Act is implemented.

No.	Recommendation
2	Police Scotland should undertake an urgent review to ensure that all officers and staff have been subject to at least Recruitment Vetting.
<p>Management Response and Actions</p> <p>A programme of ensuring that all Police Officer and Police Staff hold at least a skeleton record on Core-Vet has now been concluded. All paper copies of vetting records from legacy forces have been collated, sifted and electronically secured. A process of linking the electronic paper copies to the Core-vet record has commenced and is anticipated to be completed in the coming weeks. These actions were the first stage of ensuring compliance with this recommendation and action to date has ensured all relevant information is appropriately recorded and retained in line with current record retention policy.</p> <p>The second phase of this recommendation relies on implementation of 10-year renewals, as explained at recommendation 3 below. On completion of the first phase of 10-year renewals it will then be 100% confirmed that all officers and staff within the organisation hold at least Recruitment Vetting and this recommendation will be suitable for submission for discharge.</p>	
Target Date – Ongoing.	

No.	Recommendation
3	Police Scotland should introduce a programme so that officers and staff who hold only Recruitment Vetting are re vetted at least every 10 years.

Management Response and Actions

Section 21 of the Police & Fire Reform (Scotland) Act 2012 provides that police staff and officers are subject to the direction and control of the Chief Constable. In turn the Chief Constable must ensure that policing in Scotland is done with regard to the Policing Principles and she must seek to secure continuous improvement in Policing (section 17(2)(e)). The provisions of the 2012 Act provide the lawful basis for the direction to allow for the renewal of vetting process and in this instance specifically recruitment vetting renewals, every 10 years.

A Force Executive Memo has been approved for instruction of commencement of the 10-year renewal programme and the delivery of the programme is in the final 28 days consultation period (ending 20/08/2025) with all mandatory Staff and Diversity Associations. This follows an extensive period of local consultation with the Staff Associations, Legal Services and Governance, Audit and Assurance.

A supportive communications strategy is also in place to inform the workforce prior to commencement and the Vetting 'Manual of Guidance' (and the APP-SOP) will incorporate the requirements.

The 10-year renewals programme is set to commence within Police Scotland in September 2025, barring any significant issues being presented from the ongoing consultation.

Although the following figures are subject to slight change and will reduce due to leavers (retirals/resignations) and vetting being progressed for those in designated posts, it is currently assessed that there are approximately 8750 Police Officers, Special Police Constables and Police Staff members with service commencing from 1977 up to and including 31 December 2015 that hold Recruitment Vetting only. Those vetted from 2016 onwards will be on the cusp of 10-year renewals however the priority focus will be those members of the organisation with the longest time gap since last vetted, this also aligning with Recommendation 3.

Target Date – Ongoing.

No.	Recommendation
4	Police Scotland should ensure it has in place clear policy and robust processes for the granting of Conditional Vetting Clearance, including the ongoing management of identified risk.

This Recommendation has been complied with and has been marked as successfully discharged by HMICS.

No.	Recommendation
5	Police Scotland should as a matter of urgency review its designated posts and its guidance in relation to the identification of designated posts, prioritising those posts that require working with vulnerable people.

Management Response and Actions

The Designated Posts review of all territorial divisions, CJSD, PPCW, C3 and OSD are complete, and all relevant SCoPE updates added. The remaining areas within Police Scotland to be reviewed are CSD, SCD and SPA. The SCD and SPA reviews have commenced and once completed CSD will be progressed.

As part of this review there has been a change in vetting level for all Authorised Firearms Officers within the force. This involves 303 new MV applications being progressed by the Force Vetting Unit; a staged approach to this vetting is taking place with approximately 50% completed to date.

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Target Date – Ongoing

No.	Recommendation
6	Police Scotland should have clear policy and supporting processes in place which require all officers and staff to report relevant changes of their personal circumstances.
This Recommendation has been complied with and has been marked as successfully discharged by the HMICS.	

No.	Recommendation
7	Police Scotland should have clear policy and supporting processes requiring all officers and staff to report any off-duty criminal charge, conviction or offence.
This Recommendation has been complied with and has been marked as successfully discharged by the HMICS.	

No.	Recommendation
8	Police Scotland should have a policy in relation to reviewing the vetting clearance of officers and staff following misconduct proceedings.

Management Response and Actions

An internal process has been implemented whereby at the conclusion of all Gross Misconduct cases involving police officers that are either dismissed or who resign / retire during investigations will be notified to the Police Scotland's Force Vetting Unit for decision on a Flagstone Marker being added to PND. This supports ongoing risk mitigation for the public after the officer leaves the organisation should that individual attempt to seek employment in another vetted organisation. Discussions are ongoing with P+D to replicate a similar process for Police Staff.

In addition, an internal process has been commenced whereby The Force Vetting Unit are notified of all conduct cases commencing, all restrictions and all suspensions in order that a review can take place depending on the individuals vetting status. Discussions are ongoing with P+D to replicate a similar process for Police Staff.

The vetting APP/SOP will be updated with these processes accordingly and on commencement of introduction of the Barred and Advisory list they will be further reviewed to ensure competence.

Target Date

Ongoing to replicate the processes with P+D for Police Staff

No.	Recommendation
9	Police Scotland should have a policy whereby, if an officer or member of staff is refused or has their Management Vetting or Government (National Security Vetting) vetting clearances withdrawn this will result in a review of their Recruitment Vetting clearance.
Management Response and Actions	

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As per recommendation 1, The Police (Ethics, Conduct & Scrutiny) Scotland Act 2025 (PECSS) will provide a legislative framework which will permit a Recruitment Vetting clearance review in the circumstances described in the Recommendation.

The Authorised Professional Practice – Standard Operating Procedure (APP-SOP) which is being developed to align with the PECSS Act has incorporated this requirement for RV review. On commencement of the PECSS Act and implementation of the APP/SOP at the same time this recommendation will be submitted for consideration of discharge.

Target Date

Ongoing but will be discharged as soon as the vetting aspect of the PECSS Act is implemented.

No.	Recommendation
10	Police Scotland should introduce an annual integrity review including change of personal circumstances for all vetting clearances.

Management Response and Actions

Annual integrity reviews – known as ‘Annual Vetting Discussions’ will be commencing within Police Scotland. The new APP-SOP will provide the governance framework for this new process in order that it can commence in line with PECSS Act being implemented. This will also allow for full stakeholder consultation on the framework and proposed process. An EqHRIA and DPIA is in place.

Operationally the ‘Annual Vetting Discussions’ will be for Police Officers and Police Staff and will involve line managers having a one-on-one conversation with individuals to check the following:

- Driving licence penalty points (for all police officers and all police staff authorised to drive police vehicles)

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- Vetting change of circumstances (name, address, new partners, new co-residents, changes in financial circumstances, adverse dealings with the police)
- Any other vetting related matters – including requirement for Notifiable Association Forms / Business Interest & Secondary Employment (BISE) matters

The purpose of the meeting is for advice and guidance to be provided to the individuals and for them to be signposted to informing the Force Vetting Unit via the Vetting Change in Circumstances process and informing PSD Gateway regards any Notifiable Associations of BISE matters. The conversation will be yearly aligned to the individuals start date with the organisation.

Agreement has been reached with SCoPE Management regards an upgrade to SCoPE that will ensure appropriate IT infrastructure to support this significant piece of work. Appropriate records will be retained of the conversations and responses.

In addition, a communications strategy is being developed along with frequently asked questions and line manager and officer/staff toolkits to support roll out and successful implementation.

Target Date

Ongoing, will be implemented along with PECSS Act 2025 and the APP/SOP superseding the Vetting Manual of Guidance.

No.	Recommendation
11	Police Scotland's policies should allow all levels of vetting clearance to be refused, suspended or withdrawn.

Management Response and Actions

As per recommendation 1 and 9, The Police (Ethics, Conduct & Scrutiny) Scotland Act 2025 (PECSS) will provide a legislative framework which will allow all levels of vetting clearances to be refused, suspended or withdrawn. Police Scotland policy currently allows this for all vetting levels other than Recruitment Vetting however the PECSS Act will address this.

The Authorised Professional Practice – Standard Operating Procedure (APP-SOP) which is being developed to align with the PECSS Act has incorporated this requirement for all levels of vetting clearance to be refused, suspended or withdrawn. On commencement of the PECSS Act and implementation of the APP/SOP at the same time this recommendation will be submitted for consideration of discharge.

Target Date

Ongoing but will be discharged as soon as the vetting aspect of the PECSS Act is implemented.

No.	Recommendation
12	Police Scotland should maintain a cadre of trained Chief Superintendents or police staff equivalent, to review appeals of vetting decisions from officers and staff already employed by the service.

This Recommendation has been complied with and has been marked as successfully discharged by the HMICS.

No.	Recommendation
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13	Police Scotland should review the specific cases identified in this HMICS inspection as a matter of urgency and consider whether the vetting clearance granted is appropriate, and where risk is identified ensure mitigation plans are put in place.
This Recommendation has been complied with and has been marked as successfully discharged by the HMICS.	

No.	Recommendation
14	Where the Force Executive becomes involved in the decision making of any vetting case (out with the processes described with the Vetting Manual of Guidance) it should report these cases to the SPA Complaints and Conduct Committee for oversight.
Management Response and Actions <p>A briefing paper was submitted to CS Harrison, Head of Professional Standards Department, on 06/08/2025 for consideration and onward approval of the Force Executive. This briefing paper provided details of a change in the Vetting Manual of Guidance and the new Authorised Professional Practise – Standard Operating Procedure (APP-SOP) for Vetting whereby any deviation of guidance by the Force Executive will be reported to the SPA Complaints and Conduct Committee, closed session only, by way of a briefing report in the standard SPA Complaints and Conduct Committee template. The purpose of the report will not be to seek approval of the vetting decision but to inform of the decision for purposes of awareness only, as per the recommendation set out by HMICS.</p> <p>Approval from the Force Executive is awaited. On this being agreed, the process will be implemented immediately and this recommendation will be submitted for consideration of discharge.</p>	
Target Date	

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No.	Recommendation
15	Police Scotland should, as part of the work being conducted for the NPCC Historic Data Wash, ensure that iVPD checks are conducted for all officers and staff.
This Recommendation has been complied with and has been marked as successfully discharged by the HMICS.	