



Meeting	Complaints and Conduct Committee
Date	14 November 2024
Location	Webex
Title of Paper	HMICS Vetting Review Action Plan Progress Report
Presented By	Chief Superintendent Helen Harrison, Professional Standards Department
Recommendation to Members	For Noting/Discussion
Appendix Attached	Yes - Annex A: Vetting Improvement Plan – Update – October 2024

PURPOSE

The purpose of this paper is to provide members of the SPA Complaints and Conduct Committee with an update on the progress being made in relation to Police Scotland’s Improvement Plan to address the recommendations contained within the recent *HMICS Assurance review of vetting policy and procedures within Police Scotland* report, published on 03 October 2023.

Members are *invited to note and discuss* the contents of the paper and attached Annex.

1. BACKGROUND

1.1 On 03 October 2023, His Majesty's Inspectorate of Constabulary in Scotland (HMICS) published a report following a review of Police Scotland's vetting policy and procedures.

1.2 The aim of the review was to assure the quality of vetting and renewals and whether these effectively identified potential misconduct, risk or vulnerability. With recent high-profile cases of police officers abusing their positions, vetting is an integral part of the process to identify individuals who are unsuitable to work within policing. The review focussed on Recruitment and Management vetting of officers and staff either being recruited by or those already working within Police Scotland.

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.

2. RECOMMENDATIONS AND ACTION PLAN

2.1 The report contained 15 recommendations and identified areas for development to improve Police Scotland's vetting of its officers and staff and subsequent identification and management of risk. The report also highlighted examples of good practice within the Force Vetting Unit.

3. PROGRESS UPDATE

3.1 As at 09 October 2024, a number of recommendations have been submitted to the Police Scotland HMICS Liaison Officer for consideration for closure by HMICS. Further details and progress updates in respect of the outstanding actions can be found at Annex A.

4. FINANCIAL IMPLICATIONS

4.1 There are no financial implications in this report.

5. PERSONNEL IMPLICATIONS

5.1 There are no personnel implications in this report.

6. LEGAL IMPLICATIONS

6.1 There are no legal implications in this report.

7. REPUTATIONAL IMPLICATIONS

7.1 There are no reputational implications in this report.

8. SOCIAL IMPLICATIONS

8.1 There are no social implications in this report.

9. COMMUNITY IMPACT

9.1 There are no community implications in this report.

10. EQUALITIES IMPLICATIONS

10.1 There are no equality implications in this report.

11. ENVIRONMENT IMPLICATIONS

11.1 There are no environmental implications in this report.

RECOMMENDATIONS

Members are invited to note and discuss the contents of the paper.

HMICS Assurance Review of Vetting Policy and Procedures within Police Scotland

Recommendation	Management Response	Action to be taken	Update as at October 2024	Revised Target Date
<p>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>	<p>This recommendation is largely outside of the control of Police Scotland. We are liaising with colleagues within the Police Division of the Scottish Government to collaborate and explore the opportunities to place vetting and the requirement to attain and maintain same on a statutory footing. We are also querying whether it would be appropriate to include an amendment to the Police (Ethics, Conduct and Scrutiny) Bill which will shortly be entering Stage 2 of the legislative process. It is currently at Stage 1. We will continue regular meetings and dialogue with Scottish Government colleagues.</p>	<p>1. Ongoing liaison with Scottish Government.</p> <p>2. Explore opportunities within current Conduct or Performance Regulations whereby a FVU decision to remove vetting clearance could result in Gross Misconduct proceedings being instigated.</p> <p>3. Liaise with and continue to monitor the progress of the Metropolitan Police Service's Operation Assure - a new process to consider dismissing officers who can no longer pass vetting.</p>	<p>The Police (Ethics, Conduct and Scrutiny) (Scotland) Bill is currently at Stage 3 of the parliamentary process. We are closely monitoring the progress of this Bill and the benefits/implications this will have on Police Scotland's vetting processes.</p>	<p>31/12/2024.</p>
<p>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>	<p>As was noted within the report, current vetting practices are conducted to a good standard. All police officers, police staff, contractors and service providers are vetted in line with UK standards. Whilst there was a difference in vetting practices and recording within legacy police forces prior to the creation of Police Scotland, it must be stressed that all forces did operate vetting procedures and all officers and staff were subject of vetting on appointment. DCC Professionalism, Strategy and Engagement reiterated this position at the SPA's Complaints and Conduct Committee meeting on 14 November 2023. In addition, over 5,000 officers and staff within Police Scotland are vetted to a higher level which are subject to annual reviews. Following the announcement made by the Home Secretary, that all police officers, staff and volunteers in England and Wales are being checked against the Police National Database (PND), Police Scotland recognised the importance of the aforesaid announcement and how it may impact on their organisation and the requirement for the public to have trust and confidence in the police service, particularly following recent convictions, court cases and misconduct allegations involving serving officers. As a result, Police Scotland progressed a Historical Data Wash (HDW) to identify any intelligence or allegations that needed further investigation. Police Scotland's Anti-Corruption Unit led on the exercise along with the Force Vetting Unit, and a review of its (then) 23,472 employees (Police Officers, Members of Police Staff and volunteers) was carried out. This consisted of a check on PND and cross check of Police Scotland's internal Interim Vulnerable Persons Database (IVPD). A large volume of data was returned and any matters that required further assessment, a further deep dive took place. No significant matters were uncovered that the force were not already aware of. As a result of the HDW checks, there were no instances whereby an officer or member of staff had been criminally investigated or convicted without Police Scotland's prior knowledge. A national report / dataset relating to the HDW was released by the National Police Chiefs' Council in January 2024. In addition, a review of all matters pertaining to police perpetrated Domestic Circumstances has been undertaken between 01 January 2020 and 31 January 2023. A report is in the final stages that highlights best practice, learning and recommendations. Following HMICS review of vetting within Police Scotland, some potential issues highlighted, however recognised that the standard of vetting was good. A review is now ongoing, led by the ACU. This has resulted in a bespoke Red, Amber and Green (RAG) status risk management and mitigation model being developed and implemented. Police Scotland are taking further steps to address the matters raised within the recent assurance review and have committed to introducing a rolling programme to review vetting clearances later this year. All vetting that is conducted within the organisation is in accordance with clear guidance and, notwithstanding Scotland specific regulations, the approach is closely aligned with the Approved Professional Practice for Vetting as followed by all of UK policing. As part of the Police Scotland recruitment process, vetting is conducted prior to the appointment of all staff and officers. Since 2021 an additional vetting check is conducted prior to new officers take their oath of office.</p>	<p>1. Produce report from Domestic Circumstances review to highlight best practice, learning and recommendations.</p> <p>2. Develop and implement Red, Amber and Green (RAG) status risk management and mitigation model for ACU review.</p> <p>3. Consider alignment of PS vetting approach and guidance with the Approved Professional Practice for Vetting.</p> <p>4. Continue with back record conversion of historic and legacy vetting files.</p>	<p>Police Scotland are content that all staff and officers have been the subject of at least Recruitment Vetting. We continue to work closely with HMICS to understand what evidence they require to close this recommendation.</p>	<p>31/01/2025.</p>
<p>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.</p>	<p>RV clearance is the minimum requirement for all staff and officers working in Police Scotland. Later this year, we will be introducing a policy to renew the Recruitment Vetting (RV) clearances of staff and officers. Officers and staff who hold higher levels of vetting clearance - Management Vetting (MV) and National Security Vetting (NSV) clearance - are exempt from the requirement, as there are separate arrangements in place for the renewal of these types of clearance. Work is ongoing to develop a policy to support this work which includes benchmarking against other UK police forces. Police Scotland are taking full cognisance of the points raised by HMICS regarding introducing renewals on a 10 year basis.</p>	<p>1. Liaise with legal services and the College of Policing on whether Police Scotland can adopt the Authorised Professional Practice (APP) on Vetting for England and Wales to replace the Vetting Manual of Guidance.</p> <p>2. Develop programme/approach to 10 year vetting renewals in consultation with Scottish Police Federation (SPF) and Trade Unions - UNISON and Unite.</p>	<p>A programme to introduce 10 year renewals of Recruitment Vetting (RV) clearance is currently being debated and may be considered in early 2025 when the Force Vetting Unit is sufficiently resourced to undertake new workstreams. Police Scotland are currently considering whether to adopt the College of Policing's Authorised Professional Practice (APP) for vetting, which will better align vetting in Scotland with police vetting across the UK. This decision is currently with the Chief Constable.</p>	<p>31/03/2025.</p>
<p>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.</p>	<p>The Force Vetting Unit accepts that the guidance and processes in relation to granting conditional vetting clearances ("conditional postings") is not well considered or clear. As part of the annual review of the Vetting Manual of Guidance, a detailed section will be added to give vetting staff guidance on how to consider when a conditional posting might be appropriate / not appropriate and the factors they will require to consider. There is no provision for this within the APP for Vetting for England and Wales however enquiries have been made with the Ministry of Defence, British Transport Police and Civil Nuclear Constabulary to ascertain whether these forces have a similar process given their UK-wide jurisdiction. We are also developing a process of notification and management, which will ensure that conditional postings, when granted, are notified to the relevant teams - recruitment, professional standards and HR - to ensure this is reflected on the officer's record. ACU will also be notified to ensure ongoing management of identified risk, which may also include liaison with the officer's divisional management.</p>	<p>1. Develop detailed guidance to be added to the Vetting Manual of Guidance in the November 2023 review cycle.</p> <p>2. Development of a process to notify relevant teams when a conditional posting is granted and teams who are required to be involved in the ongoing management of identified risk.</p> <p>3. Liaise with SCoPE management team to explore the feasibility of adding marker to SCoPE, the Force's HR system, to ensure management and identification of a conditional posting is easier.</p>	<p>Evidence Submission Form submitted for closure - 09/10/2024.</p>	<p>N/A.</p>
<p>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.</p>	<p>Police Scotland accepts that the Force's Designated Posts list is out of date and work is already underway to address this. In October 2023, all divisions across the force were sent a list of all posts in their division and were asked to review, using guidance from the current Vetting Manual of Guidance, each and every post to ensure that they have the correct levels of vetting based on the requirements of the role. This first phase includes all posts to ensure the force has a comprehensive list of every post. The second phase is to take those posts which require MV clearance and create a new Designated Posts list. This list will be reviewed annually. The third and arguably most important phase is to ensure individuals within a designated post have the correct level of vetting clearance. As part of the first phase, this will include a review of any posts which are currently not designated but should be i.e. posts that require working with vulnerable people. Any changes to the definition of a designated post will be amended in the Vetting Manual of Guidance. **Remove reference to vulnerable individuals**</p>	<p>1. Phase 1 - Develop list of all posts across the force, by division.</p> <p>2. Phase 2 - Review posts which are designated, using existing and new guidance and create new Force Designated Posts list which will be reviewed annually.</p> <p>3. Phase 3 - Ensure all individuals who occupy a designated post carry the correct levels of vetting clearance.</p>	<p>Phase 1 is complete and phase 2 is in progress. Further progress on this recommendation is on hold pending the Force Vetting Unit being sufficiently resourced to undertake the remainder of phase 2 and begin phase 3. Vetting demand has increased significantly over the last 6-9 months.</p>	<p>31/03/2025.</p>

<p>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.</p>	<p>Whilst Police Scotland are confident there is sufficient guidance available to those who hold Management Vetting (MV) and National Security Vetting (NSV) clearances regarding the requirement to report changes to their personal circumstances, it is accepted there is a lack of guidance for all other staff and officers. The FVU will devise a new process for all staff and officers, irrespective of vetting clearance levels and will work with corporate comms to devise a detailed comms plan to notify the workforce and help on renewals to ensure the individual complied with this requirement.</p>	<ol style="list-style-type: none"> 1. A new process concerning changes in personal circumstances for all staff and officers to be developed in consultation with PSD and P&D to ensure staff and officers are encouraged to complete the form if reporting changes to line managers / heads of department. 2. Develop communications to remind all staff and officers that they must notify the FVU about relevant changes to their personal circumstances. A list of relevant but non-exhaustive changes in circumstances will be included. 3. Develop additional guidance to the Vetting Manual of Guidance that officers and staff must notify the FVU. 	<p>Evidence Submission Form submitted for closure - 09/10/2024.</p>	<p>N/A.</p>
<p>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.</p>	<p>There is a guidance that all officers and staff must report off-duty criminality, whether charged, convicted or otherwise however it is accepted that the process for reporting matters is not well known or familiar to all officers and staff. The guidance is contained within The Police Service of Scotland (Conduct) Regulations 2014, Schedule 1 - Standards of Professional Behaviour – Discreditable Conduct.</p> <p><i>Police officers behave in a manner which does not discredit the police service or undermine public confidence in it, whether on or off duty. Police officers report any action taken against them for a criminal offence, any conditions imposed on them by a court or the receipt of any penalty notice.</i></p> <p>For police staff, Section 8 of the Code of Conduct - Notification of Criminal Offence/Investigation:</p> <p><i>You must notify the organisation immediately if you become aware that you are the subject of any criminal investigation by the police or any other law enforcement/reporting agency. If you find yourself subject to such an investigation you must advise the police or law enforcement/reporting agency that you are employed by the Scottish Police Authority/Police Scotland. Similarly, if you are charged, reported or convicted of a criminal offence you must immediately notify the organisation of this through your line manager.</i></p> <p>Police Scotland are content there is sufficient guidance available to all staff and officers however clearer guidance on the process for reporting will be developed</p>	<ol style="list-style-type: none"> 1. Develop reminder via corporate comms and intranet to all staff and officers that they must report such matters to the PSD Gateway Unit / P&D. 2. Review of reporting to the FVU and consideration of vetting review. 	<p>Evidence Submission Form submitted for closure - 09/10/2024.</p>	<p>N/A.</p>
<p>Recommendation 8 - Police Scotland should have a policy in relation to reviewing the vetting clearance of officers and staff following misconduct proceedings.</p>	<p>It is accepted there is no formal policy on reviewing the vetting clearances of officers or staff following misconduct proceedings. This gap was recognised at the end of 2022 when the HMICFRS inspection of Vetting, Misconduct and Misogyny in the Police Service report was published. As a result of this, an informal pilot process was developed between the PSD Conduct Unit and the FVU. Initially the process worked well however as it was not formally documented, it is not as robust as it could be. A formal process which will be referenced in the Vetting Manual of Guidance will be developed. This will also be developed with People and Development to include police staff.</p>	<ol style="list-style-type: none"> 1. Establish formal process for reviewing vetting clearances with additional guidance included in Vetting Manual of Guidance and existing Disciplinary/Misconduct SOPs for both staff and officers.. 	<p>Evidence Submission Form submitted for closure - 09/10/2024.</p>	<p>N/A.</p>
<p>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.</p>	<p>It is appreciated that the current Vetting Manual of Guidance does not allow all levels of vetting clearance to be refused, suspended or withdrawn and there is no provision for review of suitability to continue to hold RV clearance after an officer or staff member has their MV or NSV refused. This position will be reviewed, in line with the recently published Vetting Code of Practice. This sets out 18 requirements of Chief Officers and one requirement is the ability to review or renew any vetting type in line with the renewals process or if adverse information comes to light at any time. We are also liaising with colleagues within the Police Division of the Scottish Government in respect of Recommendation 1, to collaborate and explore the opportunities to place vetting and the requirement to attain and maintain same on a statutory footing. We are also querying whether it would be appropriate to include an amendment to the Police (Ethics, Conduct and Scrutiny) Bill which will shortly be entering Stage 2 of the legislative process. It is currently at Stage 1. We will continue regular meetings and dialogue with Scottish Government colleagues.</p>	<ol style="list-style-type: none"> 1. Ongoing liaison with Scottish Government. 2. Review Police Scotland's Vetting Manual of Guidance to mirror the Vetting Code of Practice relating to all vetting clearance levels being subject to review and refusal should unmanageable adverse information arise. 	<p>Police Scotland are currently considering whether to adopt the College of Policing's Authorised Professional Practice (APP) for vetting, which will better align vetting in Scotland with police vetting across the UK. Should this be approved, this will allow all vetting clearance levels to be reviewed, refused, suspended or withdrawn. This decision is currently with the Chief Constable.</p>	<p>30/11/2024.</p>
<p>Recommendation 10 - Police Scotland should introduce an annual integrity review including change of personal circumstances for all vetting clearances.</p>	<p>With 23,500 staff and officers, this would be a significant undertaking for the FVU to manage and is unlikely to be achieved with the current resources aligned to the department. Changes in personal circumstances can be reported to the FVU as and when they arise, in line with the new process which will be developed in response to Recommendation 6. We will also liaise with P&D to consider the introduction of an annual wellbeing support conversation between employees and line managers to cover changes to personal circumstances and/or issues arising which may need support/escalation.</p>	<ol style="list-style-type: none"> 1. Identify and consider options with P&D to add an annual wellbeing support conversation into the annual MyCareer process. 2. New process will be developed where staff and officers will require to submit relevant changes to their personal circumstances to the FVU as and when they arise. 	<p>Discussions are ongoing to introduce an annual review between line managers and direct reports, and colleagues within PSD have been discussing this with colleagues responsible for the MyCareer process. It is hoped progress will be made in this regard in the next quarter. As per the update for Recommendation 6, there is now a process in place for staff and officers to report changes in their personal circumstances.</p>	<p>31/12/2024.</p>
<p>Recommendation 11 - Police Scotland's policies should allow all levels of vetting clearance to be refused, suspended or withdrawn.</p>	<p>It is accepted that the current Vetting Manual of Guidance does not allow all levels of vetting clearance to be refused, suspended or withdrawn, most notably, RV clearance. This position will be reviewed, in line with the recently published Vetting Code of Practice. This sets out 18 requirements of Chief Officers and one requirement is the ability to review or renew any vetting type in line with the renewals process or if adverse information comes to light at any time.</p>	<ol style="list-style-type: none"> 1. Amend Police Scotland's Vetting Manual of Guidance to include process for the review of vetting clearance levels. 2. Review impact of changes to guidance during annual Vetting Manual of guidance amendment cycle 	<p>Police Scotland are currently considering whether to adopt the College of Policing's Authorised Professional Practice (APP) for vetting, which will better align vetting in Scotland with police vetting across the UK. Should this be approved, this will allow all vetting clearance levels to be reviewed, refused, suspended or withdrawn. This decision is currently with the Chief Constable.</p>	<p>30/11/2024.</p>

<p>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.</p>	<p>We accept that there is a lack of guidance in the Vetting Manual of Guidance about Management Vetting (MV) appeals, nor are there processes in place for this to be consistently handled. A training programme and sufficient guidance materials will be developed, with appropriately trained chief superintendents sitting on a rota to handle appeals. This will prevent ad hoc appointments and possible inconsistencies. Thereafter the Vetting Manual of Guidance will be updated to incorporate this new process.</p>	<ol style="list-style-type: none"> 1. Scoping of interested Chief Superintendents who would want to be trained and sit on a rota to handle MV appeals. 2. Development of training programme for Chief Superintendents to handle MV appeals and development of document sets including guidance, instructions and template letters. 3. Updated guidance to Vetting Manual of Guidance to reflect new guidance for MV appeals. 4. Review training programme as part of annual amendment cycle 	<p>Evidence Submission Form submitted for closure - 09/10/2024.</p>	<p>N/A.</p>
<p>Recommendation 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.</p>	<p>Since July 2023, there has been work ongoing to review and address the risks identified in the cases flagged by HMICS, which spanned the period 2019-2022. This work is ongoing and an update on the specific cases can be provided to HMICS if required.</p>	<ol style="list-style-type: none"> 1. Continue with case review and liaison between relevant departments - FVU, PSD, ACU, legal services and divisional commanders to manage risk if required. 	<p>A meeting is due to take place between ACC Stuart Houston, Professionalism and Assurance, DSU Alan O'Brien, Head of Anti-Corruption Unit and colleagues from HMICS in order to provide a full update. Following this private update, HMICS are content this recommendation can be submitted for closure.</p>	<p>30/10/2024.</p>
<p>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.</p>	<p>Whilst there has been involvement in a small number of cases in the past, the Force Executive do not routinely become involved in the decision making of vetting casework. This is delegated to the Force Vetting Manager. For any involvement in future, an audit trail will be added to the Core/Vet system to ensure there is a rationale for them becoming involved. There is however a lack of guidance for ACC/Director level involvement in accepting risk, where vetting has been refused but the Force wishes to proceed at risk by making a policy decision to do so. The Vetting Manual of Guidance states "All decisions and recommendations made should be consistent with this guidance. Any deviations from this must be authorised at chief officer level (ACC/Director or above)" however there is insufficient guidance on the process of making policy decision, which factors should be considered by the ACC/Director and in relation to the ongoing review of risk once the policy decision has been made and the risk has been accepted by the force.</p>	<ol style="list-style-type: none"> 1. Develop additional guidance about policy decisions made by ACC/Director including which factors should be considered and how risk should be managed moving forward. 	<p>Following a review of how evidence is logged on the vetting system, Police Scotland are content that there are robust audit and assurance processes in place to address the recommendation. We continue to work closely with HMICS to understand what evidence they require to close this recommendation.</p>	<p>31/01/2025.</p>
<p>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.</p>	<p>Manual checks of IVPD records have been completed alongside the NPCC Historic Data Wash. An update can be provided to HMICS if required</p>	<ol style="list-style-type: none"> 1. Police Scotland will review the national HDW report and take any action as appropriate. 	<p>Closed - January 2024.</p>	<p>N/A.</p>
<p>AFD01-Police Scotland should ensure that the quality assurance sampling of vetting cases is carried out and that records are maintained evidencing this process. AFD02-Police Scotland should increase the use of vetting interviews, ensuring that FVU staff are trained and confident in carrying out these interviews. AFD03-Police Scotland should have a vetting IT system that interfaces with its human resources IT system. AFD04-Police Scotland should review the administration of the vetting appeals process from potential recruits and new members of staff, with a view to reducing the burden on the Force Vetting Manager and their deputy. The responsibility of overturning any vetting decision should remain with the Force Vetting Manager.</p>	<ol style="list-style-type: none"> 1. Since the HMICS inspection, quality assurance sampling of vetting approvals is now done on a monthly basis. Given resourcing challenges, this currently stands at one case per vetting officer per month but we hope to increase this in the future depending on workload and resources. 2. Interview guidance from the Authorised Professional Practice (APP) for England and Wales will be incorporated into the Vetting Manual of Guidance in November 2023. In addition, we will amend our training materials for new staff and create a bespoke training refresher on interviewing skills for current staff. We will utilise the experience within other areas of Professional Standards and the Anti-Corruption Unit who have extensive investigative interviewing skills. 3. It is not currently possible for the current vetting system, CoreVet to interface with Police Scotland's HR IT system, SCOPE. To do so would come with cost and resource implications outside of the FVU (Digital Division) and there would need to be sufficient safeguards and firewalls in place to ensure HR staff do not have access to vetting information as they do not have a lawful need to do so. We will liaise Liaison with Digital Division to ascertain if it is feasible and within resourcing and budgetary constraints to amend/update the current HR system to interface with the vetting system. 4. A structure review of the FVU is ongoing and consideration will be given to this Area for Development recommendation. Consideration is being given to recruiting an embedded Chief Inspector within the FVU to bridge knowledge gaps between FVU and internal partners (e.g. PSD, ACU, etc) critical to the functions of FVU. This role would also provide resilience in the appeals process for refusal of RV and provide support to the Force Vetting Manager and their deputy. 	<ol style="list-style-type: none"> 1. Continue with monthly quality assurance sampling of vetting approvals with effectiveness analysis at 6 months and 12 months. 2. Include interview guidance from the Authorised Professional Practice (APP) for England and Wales into the Vetting Manual of Guidance. 3. Amend training materials for new staff and create a bespoke training refresher on interviewing skills for current staff. 4. Liaise with Digital Division to ascertain if it is feasible and within resourcing and budgetary constraints to amend/update the current HR system to interface with the vetting system. 5. Benchmark with other sized UK police forces to contribute to FVU structure review. 	<ol style="list-style-type: none"> 1. Quality assurance checking is now completed on a monthly basis as business-as-usual. We would look to increase this when capacity allows. This AFD will be submitted for closure. 2 / 3. The use of interviews has increased with training being planned for new and existing staff to improve interview skills. This AFD will be submitted for closure. 4. This has not been explored due to budgetary restraints and capacity issues. We thank HMICS for raising this AFD and will explore in the future if budget/capacity allows. 5. A benchmarking exercise was completed in early 2024, the results of which are being digested by FVU and PSD management. This AFD will be submitted for closure. 	<p>30/10/2024.</p>