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**Policing**

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# Vetting authorised professional practice

May 2025

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# Contents

<b>1. Introduction.....</b>	<b>9</b>
<b>2. Purpose of vetting.....</b>	<b>12</b>
<b>3. Expectations in relation to police vetting.....</b>	<b>13</b>
3.2 Expectations of police forces .....	13
3.2.1 Disproportionality monitoring and management.....	13
3.2.2 Supporting the wider protective security regime .....	14
3.3 Expectations of human resources (HR) .....	15
3.3.1 Employment eligibility .....	15
3.3.2 Nationality check .....	15
3.3.3 Employment references.....	15
3.3.4 Identity check.....	15
3.3.5 Biometric vetting.....	16
3.3.6 Reporting concerns during the recruitment process.....	17
3.3.7 Information sharing for transferees .....	17
3.3.8 Posting information.....	17
3.3.9 HR advice for vetting decision makers .....	18
3.4 Expectations of force vetting units (FVUs) .....	18
3.4.4 Gender recognition.....	19
3.4.5 Information sharing for transferees .....	20
3.4.6 Police barred list and advisory lists .....	21
3.4.7 Establishment posts and records of vetting level requirements .....	21
3.4.8 Designated posts – list of posts requiring additional considerations	22
3.5 Expectations of force vetting managers (FVMs) .....	22
3.5.4 Obligations under the Equality Act 2010 and safeguarding against disproportionality.....	23
3.6 Expectations of elected local policing bodies and chief officers.....	23
3.7 Expectations of supervisors and vetting sponsors .....	24
3.8 Expectations of police personnel, agency personnel and volunteers .....	25
3.9 Expectations of non-police personnel .....	28
3.10 Expectations of applicants for vetting clearance .....	29
3.11 Expectations of independent legally qualified persons and independent panel members of misconduct hearings.....	29
<b>4. Vetting regimes .....</b>	<b>30</b>
<b>5. Police vetting.....</b>	<b>31</b>
5.2 Police vetting levels .....	32

---

5.3	Eligibility for police vetting .....	33
5.3.2	Residency criteria.....	33
5.3.2.1	Application of the residency criteria .....	34
5.3.2.2	Residency and service with HM Government or the armed forces .....	35
5.3.2.3	Considerations to be made when applying the residency criteria .....	36
5.3.2.4	Residency discretion and ability to transfer between forces .....	36
5.3.2.5	Residency considerations for national security vetting requirements .....	37
5.3.3	Checkable history.....	37
5.4	Police personnel vetting levels .....	38
5.4.1	Recruitment vetting (RV) .....	38
5.4.2	Management vetting (MV) .....	38
5.5	Police personnel roles with prescribed vetting level requirements.....	41
5.5.1	Vetting of chief constables .....	41
5.5.2	Vetting of other chief officers .....	41
5.5.3	Attendance at College of Policing executive leadership programme	42
5.5.4	Roles working closely with vulnerable individuals .....	42
5.6	Non-police personnel vetting (NPPV).....	43
5.6.9	NPPV level 1 .....	44
5.6.10	NPPV level 2 abbreviated .....	45
5.6.11	NPPV level 2 full .....	45
5.6.12	NPPV level 3.....	46
5.7	Police National Vetting Service (PNVS) .....	46
5.8	Non-police personnel roles with prescribed vetting level requirements....	47
5.8.1	Non-police personnel who do not need to be vetted .....	47
5.8.2	Individuals appointed by the elected local policing body (ELPB) .....	47
5.8.3	Volunteer police cadets .....	48
5.8.4	Cadet leaders.....	48
5.9	Granting of vetting clearance.....	49
5.10	Disclosure and Barring Service (DBS) checks.....	49
<b>6.</b>	<b>Police vetting processes .....</b>	<b>51</b>
6.1	Commencement of police vetting.....	51
6.2	Maintaining records .....	51
6.3	Disclosure of information to the vetting applicant.....	53
6.4	Authentication.....	54

---

6.5	Standard checks and assessments .....	55
6.5.1	Police National Computer (PNC) check.....	57
6.5.2	Police National Database (PND) check and other force enquiries ...	58
6.5.3	Police intelligence records and other non-conviction database checks .....	59
6.5.4	Electoral register and co-residents check.....	60
6.5.5	Counter Terrorism Unit checks .....	61
6.5.6	Credit reference checks.....	61
6.5.7	Open source enquiries .....	62
6.5.8	Professional standards department (PSD) and counter corruption unit (CCU) checks.....	62
6.5.9	Ministry of Defence (MoD) checks .....	63
6.5.10	ACRO Criminal Records Office (ACRO) checks .....	63
6.5.11	Barred and advisory list check .....	64
6.5.12	Consideration of financial position.....	65
6.5.13	Full financial checks .....	66
6.5.14	Assessment of risk to vulnerable individuals.....	66
6.5.15	Annual integrity and vetting review.....	67
6.5.16	Business interests and additional employment considerations .....	68
6.5.17	Liaison with occupational health .....	69
6.5.18	Supervisor appraisal.....	70
6.5.19	Crime report allegations .....	71
6.5.20	Biometric vetting checks .....	71
<b>7.</b>	<b>Maintaining vetting clearance .....</b>	<b>73</b>
7.1	Vetting reviews .....	73
7.2	Types of vetting review.....	74
7.2.2	Full vetting review .....	74
7.2.3	Focused vetting review .....	76
7.3	Reviewing vetting clearance following misconduct .....	77
7.4	Triggers for a full vetting review .....	79
7.4.1	Internal moves .....	79
7.4.2	Employment group changes .....	80
7.4.3	Extended absence .....	80
7.4.4	Commencing a secondment .....	81
7.4.5	Return following secondment.....	81
7.4.6	Return following dismissal .....	81
7.4.7	Career break returners .....	82

7.4.8	Delays in appointment .....	83
7.5	Transferees .....	84
7.5.1	Vetting of police personnel transferring or moving between forces ..	84
7.5.2	Transfer or other movement between forces during, or after, professional standards investigations.....	86
7.6	Re-joiners and those with previous police service .....	87
7.7	Sharing police vetting clearances .....	88
7.8	Reciprocal vetting .....	88
7.8.1	Reciprocal vetting for vetting personnel.....	88
7.8.2	Reciprocal vetting for chief constables .....	89
7.9	Transfer of Undertakings (Protection of Employment) Regulations .....	89
7.10	Renewing police vetting clearances .....	90
<b>8.</b>	<b>Decision-making and transparency .....</b>	<b>92</b>
8.4	Gathering information and intelligence .....	92
8.5	Assessing threat and risk and developing a working strategy .....	93
8.5.2	Assessing threats and risks .....	93
8.5.3	Factors requiring particular scrutiny .....	94
8.5.4	Assessing circumstances that may impair judgement or result in vulnerability to pressure or inducements and trustworthiness.....	96
8.5.4.a	Circumstances that may impair judgement or result in vulnerability to pressure or inducements.....	96
8.5.4.d	Assessing the criteria for trustworthiness .....	96
8.5.5	Developing a working strategy .....	97
8.5.5.b	Non-disclosure .....	98
8.5.6	Vetting interviews .....	99
8.6	Considering powers and policy .....	100
8.6.1	Vetting Code of Practice .....	100
8.6.2	Rehabilitation of Offenders Act 1974 (ROA) .....	100
8.6.2.c	ROA – Police staff posts, including PCSOs, and non-police personnel .....	101
8.6.3	Crown Prosecution Service (CPS) disclosure manual.....	102
8.6.4	Employment Rights Act 1996 and The Police (Vetting) Regulations 2025 .....	103
8.6.5	Police regulations .....	104
8.6.6	Standards of professional behaviour .....	105
8.6.7	Code of Ethics.....	105
8.6.8	Counter corruption APP.....	106

8.6.9	Information management APP .....	106
8.6.10	UK Government Care Leaver Covenant for England .....	107
8.6.11	Association of Chief Police Officers (ACPO) (2013) Guidelines on the safe use of the internet and social media by police officers and police staff .....	107
8.7	Identifying options and contingencies .....	107
8.7.2	Risk mitigation strategies .....	107
8.8	Taking action and reviewing what happened .....	110
8.8.4	Reviewing what happened .....	111
<b>9.</b>	<b>The vetting decision.....</b>	<b>112</b>
9.8	Decisions do not establish a precedent.....	113
9.9	Two-stage test considerations .....	114
9.10	Clearance with conditions.....	115
9.11	Partially approved clearance .....	115
9.12	Suspension.....	116
9.13	Declining and withdrawing clearance for existing internal police personnel .....	117
9.14	Declining and withdrawing clearance for other vetting applicants.....	119
9.15	Communicating the decision.....	120
<b>10.</b>	<b>Vetting appeals.....</b>	<b>121</b>
10.7	Conducting appeals – Existing internal police personnel .....	122
10.8	Conducting appeals – other vetting applicants .....	122
10.9	Vetting appeal panel for other applicants .....	123
10.10	Appealing clearance with conditions .....	124
<b>11.</b>	<b>National security vetting (NSV).....</b>	<b>125</b>
11.9	Renewing NSV clearances .....	126
11.10	Transferring and sharing NSV clearances.....	127
11.11	NSV appeals procedure .....	128
11.12	NSV quick links.....	129
<b>Appendices.....</b>		<b>130</b>
Appendix A	– National vetting data framework .....	130
Appendix B	– Annual integrity and vetting review .....	141
Appendix C	– PND intelligence report text template for adverse recruitment or vetting information .....	152
Appendix D	– Supervisor appraisal .....	153
Appendix E	– Transferee recruitment checklist.....	159
Appendix F	– Sensitive intelligence – good practice advice for forces .....	161

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Appendix G – NPPV level 3 annual vetting notice template .....	164
Appendix H – National digital vetting form section catalogue .....	167
Appendix I – Police vetting form questions and guidance .....	168
Appendix J – Police barred and advisory lists information.....	277
Appendix K – Vetting decision record form.....	279
Appendix L – Conducting exploratory vetting interviews .....	286
Appendix M – Aide-memoire for vetting decision making .....	291
Appendix N – Common vetting risk categories .....	305
Appendix O – Rehabilitation of Offenders Act guidance for decision makers ...	335
Appendix P – Sample financial scoring sheet .....	337
Appendix Q – Glossary.....	343

# 1. Introduction

1.1 Everyone within, working with, representing or delivering a service for the police service must maintain and support the highest ethical and professional standards. They must act with the utmost integrity. This reflects society's unique expectations of policing. It is important that the public are confident that the trustworthiness of those in policing is beyond question. A thorough and effective vetting regime is a key component in achieving this.

1.2 It is essential that the public is confident that police vetting processes are effective. They must be able to trust them to identify those posing a potential risk to others, or who are otherwise unsuitable to work within the police service. It is also crucial that those working within policing can maintain the trust and confidence of their chief constable to perform their role.

1.3 This authorised professional practice (APP) provides information on the national vetting standards that will be applied by police forces in England and Wales. It has been developed to support the consistent application of vetting procedures. Failure to adhere to these standards and procedures creates risks to the safety, trust and confidence of the public, and the security, integrity and reputation of policing. Its purpose is to:

- Set the vetting standards to be applied and followed.
- Provide guidance on the checks and assessments required to deliver effective vetting processes.
- Support the consistent application of vetting standards across the police service.
- Support a consistent approach to assessing threat, risk and vetting decision making.
- Support the standards expected of those serving, or working in or with, policing, as set out in the [standards of professional behaviour for police officers and special constables](#) and the [Police Staff Council standards of professional behaviour for police staff](#). They are

collectively referred to in this APP as the standards of professional behaviour.

1.4 Vetting must not be used in isolation and should form part of a wider protective security regime. This APP should be read in conjunction with the [Vetting Code of Practice](#), [the national decision model \(NDM\)](#) and [The Police \(Vetting\) Regulations 2025](#).

1.5 To support a robust protective security regime in policing, all police personnel have a duty to challenge or report inappropriate behaviour by their colleagues.

1.6 This APP is aimed at:

- The [police forces](#) maintained for the police areas of England and Wales defined in [section 1 of the Police Act 1996](#). It is available for adoption by other police forces or agencies.
- [Vetting units](#), including vetting units outside the above, that conduct police vetting.
- [Force vetting managers](#) (FVMs).
- [Chief officers](#) responsible for overseeing the vetting processes in their force.
- All [supervisors](#) in force.
- [HR staff](#) involved in the vetting process.
- Serving personnel acting as sponsors of vetting applicants.

It also sets out the statutory duties of elected local police bodies and vetting requirements for their staff.

1.7 It will also be of interest to those who need to understand the vetting procedures and decision making that will apply to them. These include:

- Applicants to the police service.
- Police personnel within forces, including police officers, members of police staff and members of the Special Constabulary.
- Individuals and organisations working under contract to, in partnership with or on a voluntary basis with police forces in England and Wales.

- The staff of local policing bodies who have unrestricted access to any police premises or police information that is not publicly available.

These include:

- Offices of the police and crime commissioners (PCCs).
  - The Mayor's Offices for Policing and Crime.
  - The Court of Common Council in the City of London.
- The College of Policing and its personnel.

1.8 A glossary at [Appendix Q](#) explains the terms in this APP.

## 2. Purpose of vetting

2.1 Vetting is conducted in the police service to help identify, assess and manage risk relating to areas including, but not limited to:

- corruption and coercion
- integrity
- leadership
- national security
- operational safety
- protection of police and organisational assets
- public safety
- public trust and confidence

2.2 Vetting assists with identifying individuals who are unsuitable to work in the police service or have access to police assets. This includes people who:

- are unsuitable through criminal activity or **association**
- pose a risk to the public and to those who are particularly **vulnerable**
- have a demonstrable lack of honesty
- have previously behaved in a manner that is inconsistent with the **standards of professional behaviour**
- are financially vulnerable
- lack the necessary maturity or self-control, even if their integrity is not in question – **Victor R. (On the Application Of) v Chief Constable of West Mercia Police [2023] EWHC 2119 (Admin) (18 August 2023)**

## 3. Expectations in relation to police vetting

3.1 Police vetting will not be effective in isolation. It forms part of a wider protective security regime. This section sets out guidance on the expectations and responsibilities of forces and vetting units. It additionally includes those who work across policing, including contractors, consultants, partner agencies and volunteers, and those seeking to join the service.

3.1.1 The responsibility for vetting in a force sits with the chief constable who is the vetting authority. They may delegate vetting authority functions under [The Police \(Vetting\) Regulations 2025](#), and meet the expectations of the [Vetting Code of Practice](#) to ensure the effective delivery of vetting in their force.

### 3.2 Expectations of police forces

#### 3.2.1 Disproportionality monitoring and management

3.2.1.a In accordance with the [Vetting Code of Practice](#) and [public sector equality duty](#), forces must monitor the protected characteristic data of vetting applicants. This includes outcomes of vetting to understand whether there is any disproportionate adverse impact on underrepresented groups. Where disproportionality is identified, forces must take steps to examine and address this, while maintaining the safeguards that vetting provides. This will assist with meeting obligations under the [Equality Act 2010](#).

3.2.1.b Forces should have suitable IT systems in place to collect and report on all application types and outcomes. They should use the national vetting data framework at [Appendix A](#) in accordance with the protected characteristic categories. These are defined by the College's national standard for recording workforce data information on the [Professional Standards – Vetting group](#) on the Knowledge Hub (login required).

3.2.1.c Forces should ensure they:

- are aware of, and understand the significance of unconscious bias and identify options to mitigate its impact, implementing suitable and proportionate actions
- can provide statistical information from available force data that relates to vetting decisions where a protected characteristic is known
- support and promote positive action in respect of all underrepresented groups in the police service

## 3.2.2 Supporting the wider protective security regime

- 3.2.2.a Forces must have a robust annual integrity and vetting review process in place – [see Appendix B](#). The outcome of the review should be recorded.
- 3.2.2.b Those who fail to comply with the annual integrity and vetting review process, without reasonable justification, can invalidate their current police vetting clearance. In these circumstances it may be appropriate for clearance to be withdrawn.
- 3.2.2.c Lack of compliance with the annual integrity and vetting review process by serving personnel or a supervisor may be dealt with through unsatisfactory performance or misconduct processes. The force vetting unit (FVU) should be notified of this where necessary and proportionate.
- 3.2.2.d Forces should have a dedicated intranet page that informs serving personnel of the requirements and expectations in maintaining a vetting clearance. This should be kept up-to-date with relevant force links, policies and contact details.
- 3.2.2.e Forces should ensure that all new starters are made aware of the annual integrity and vetting review process and are shown how to find the page.
- 3.2.2.f Forces should ensure that where departments hold information about serving police personnel that may affect suitability to hold vetting clearance, this is shared with FVUs. This information may be held by departments such as professional standards, counter corruption and HR and information sharing will often be managed through people intelligence meetings. Where relevant and proportionate, consideration should be

given to creating an intelligence marker in the Police National Database (PND).

### 3.3 Expectations of human resources (HR)

#### 3.3.1 Employment eligibility

3.3.1.a For those employed by or appointed to the force, the right to work should be verified in accordance with [Home Office guidance](#). This is normally carried out by the HR department during the recruitment process. For those seeking to obtain non-police personnel clearance, it is the responsibility of the employer to verify employment eligibility.

#### 3.3.2 Nationality check

3.3.2.a Nationality checks ensure compliance with the statutory obligation under the [Immigration, Asylum and Nationality Act 2006 sections 15 to 25](#). Nationality can be verified by examining the vetting applicant's passport. This is normally established during recruitment. For further information, see [3.3.4](#) and Home Office and UK Border Force 2012 [Summary guide for employees on preventing illegal working in the UK](#).

#### 3.3.3 Employment references

3.3.3.a The recruiting authority is responsible for checking employment references for all applicants. This is normally carried out by HR.

3.3.3.b It is not expected that separate references for vetting are obtained except for management vetting (MV) clearances for serving personnel. For these, a supervisor appraisal should be obtained.

#### 3.3.4 Identity check

3.3.4.a Identity verification is essential to providing legitimacy to the vetting process. It is the foundation to the integrity of any vetting clearance.

3.3.4.b The vetting applicant's identity should be verified through use of documents such as a passport or driving licence. Guidance on suitable original documents that can be used for identification purposes can be found in the [HMG Baseline Personnel Security Standard](#).

- 3.3.4.c It is not expected that the FVU physically examines all identity documents. This is normally carried out by force HR teams or by another appropriate sponsor. Where identity documents are checked by the sponsor, they should provide a declaration confirming they are satisfied the information and candidate's physical appearance match those in the documents. This must be completed before the vetting process is started.
- 3.3.4.d Copies of the verified identity documents, along with the [authentication declaration](#), should be shared with or made easily accessible to the FVU. They should remain accessible for the duration of the vetting clearance and associated retention periods.
- 3.3.4.e Details on the vetting form should be re-verified against the identity documents by the FVU.

### 3.3.5 Biometric vetting

- 3.3.5.a Biometric vetting for police officer and special constable applicants is set out in:
- regulation 10A of the [Police Regulations 2003](#), as amended by the [Police \(Amendment No. 3\) Regulations 2012](#)
  - [regulation 1ZA of the Special Constables Regulations 1965](#)
- These regulations state that a candidate for appointment as a police officer or special constable must undergo biometric vetting, with consent, and the chief officer must be satisfied with the results prior to appointment.
- 3.3.5.b [Biometric vetting checks](#) should be undertaken for candidates receiving a conditional offer of appointment, concurrent with the other stages of the vetting process. This includes police staff candidates being employed in posts requiring biometric vetting as outlined in [3.3.5.c](#). This is not required for those transferring forces, or special constables who are becoming regular officers.
- 3.3.5.c There is no legal requirement for police staff to undergo biometric vetting. However, police staff posts where there are risks as a result of the front-

line nature of the role, or involve considerable time spent with the public, should be subjected to biometric vetting. Forces should audit police staff posts and identify those for which biometric vetting is proportionate and justifiable.

### 3.3.6 Reporting concerns during the recruitment process

3.3.6.a The recruitment authority should retain information if adverse behaviours of concern are identified during the recruitment process. They should ensure that an intelligence report is created in the PND, with details of the department retaining the information – [see Appendix C](#). This will enable the information to be assessed in future police vetting applications.

Adverse behaviours include, but are not limited to:

- racist, sexist, homophobic or other discriminatory language, or behaviour, harassment, victimisation or bullying
- demonstration of criminal behaviours that are reported to the police
- failure of a medical drugs test

3.3.6.b Any such adverse behaviours should lead to an applicant being removed from the recruitment process. If, in exceptional circumstances, this is not the case, the relevant FVU must be informed of the adverse behaviour for consideration during the vetting process.

3.3.6.c The relevant recruitment authority must make the applicant aware of the concerns identified. They must explain that this information will be recorded and made available to FVUs in any vetting applications.

### 3.3.7 Information sharing for transferees

For further information, see [section 3.4.5 – Information sharing for transferees](#).

### 3.3.8 Posting information

HR should maintain up-to-date records of police personnel and postings. Prior to police personnel moving posts, HR should inform the FVU to allow an assessment of vetting requirements to be completed.

### 3.3.9 HR advice for vetting decision makers

**Section 5.6** of the Vetting Code of Practice 2023 states that vetting decision making is separate from, and independent of, recruitment and other HR functions. This prevents potential conflict of interest, for example vetting decisions to decline clearance leading to missed recruitment targets. This does not preclude vetting decision makers from seeking advice during either initial decision making or any subsequent appeal process.

## 3.4 Expectations of force vetting units (FVUs)

3.4.1 Vetting units must have a nominated FVM or equivalent. The FVM must have the delegated authority of the chief officer of their force to grant or decline vetting clearances and perform delegated vetting authority functions relevant to their role. These arrangements may be delivered collaboratively with other forces. A scheme of delegation should be in place, subject to periodic review, to ensure the circumstances when authority is delegated are clear.

3.4.2 FVUs must:

- Deliver the expectations set out in the **Vetting Code of Practice** on behalf of their chief constable and comply with standards set out in this APP and **The Police (Vetting) Regulations 2025**.
- Carry out their functions in line with relevant legislation. This includes the **Data Protection Act (DPA) 2018** and General Data Protection Regulation (GDPR) 2018.
- Ensure that vetting applicants, serving police personnel and non-police personnel clearance holders know their obligations under the **Vetting Code of Practice** and this APP.
- Ensure that vetting processes are carried out consistently and efficiently.
- Ensure that all vetting enquiries are undertaken with professional rigour and curiosity.
- Coordinate and manage all clearances for their relevant area.

- Ensure that when a vetting clearance is declined or withdrawn, the vetting applicant is provided with as **much information** as possible.
- Ensure that **vetting reviews** and renewals are conducted on clearances where necessary. See **renewing police vetting clearances**.
- Ensure that clearances are terminated when they expire, are no longer required or withdrawn.
- Maintain records detailing all clearances conducted by the unit and have a retention schedule for such information.
- Handle all information provided and revealed during the vetting process with appropriate levels of sensitivity and security.
- Maintain appropriate levels of confidentiality. Information should only be released to third parties where necessary and proportionate, such as during a relevant criminal or misconduct inquiry.
- Have local representation on the **Professional Standards – Vetting group** on the Knowledge Hub (login required).
- Consider adopting the additional recommended templates and guidance that accompany this APP, available from the College of Policing.
- Consider providing a contact point for vetting-related queries in any vetting guidance. A separate contact should be provided for queries or concerns related to equality, diversity or gender history. This allows such queries to be made independently of the vetting unit.

3.4.3 Personnel working in vetting should obtain MV clearance, with a national security vetting (NSV) level security check (SC) applied where appropriate.

### 3.4.4 Gender recognition

3.4.4.a For vetting purposes, all previous names must be disclosed by the vetting applicant, including those from before they transitioned. While the **Gender Recognition Act 2004** does not require disclosure, there is no statutory protection for vetting applicants who fail to disclose such information.

Where vetting enquiries suggest that a previous identity was not disclosed, an exploratory vetting interview should be conducted to understand the reasons for this.

- 3.4.4.b Where vetting applicants have transitioned, previous identities should be treated as separate individuals. If it is necessary to make enquiries outside of the vetting unit, the names should be listed separately, rather than as a previous name on the same enquiry.
- 3.4.4.c Details that identify transgender status should only be recorded on the vetting system. These must not be shared outside the vetting unit.
- 3.4.4.d Under [section 22 of the Gender Recognition Act 2004](#), it is an offence to disclose that someone is transgender unless such disclosure is made in accordance with statutory provisions.

### 3.4.5 Information sharing for transferees

- 3.4.5.a The following information must be collated by the relevant force departments responsible for holding that information, in respect of all vetting applicants transferring between forces:
- performance, including being subject to [regulation 12](#), or where there is intention to serve a notice under [regulation 13](#) of the Police Regulations 2003
  - sickness
  - complaints and misconduct
  - business interests
  - notifiable associations
  - corruption intelligence
  - current supervisor appraisal

For further information, see [Appendix E](#).

- 3.4.5.b There is a presumption of transparency and full disclosure of information related to transferees, to ensure that the receiving force can assess any risks effectively. Where a member of serving personnel is seeking to transfer to another force, the [parent force](#) will be notified. If they are

aware of adverse information concerning their suitability to transfer, it must be explicitly disclosed to the requesting force. This will ensure they are fully sighted on such information at the earliest opportunity, unless exceptional risks are identified. See [3.4.5.c](#).

- 3.4.5.c If the nature of the information held by the parent force requires specific handling conditions, this should be arranged as soon as possible through suitable channels. Where information held is so sensitive and the risk of sharing with the receiving force is assessed as exceptionally high, the parent force should provide a statement explaining the context and rationale. Decisions to withhold information should give due consideration to the policing purpose of the vetting process in protecting the public and police assets. For further information, see [Appendix F](#).

### 3.4.6 Police barred list and advisory lists

- 3.4.6.a As part of the vetting process, the FVU must check the police barred list and police advisory list. For further information, see [section 6.5.11](#) and [Police Barred List and Police Advisory List Regulations 2017](#).

### 3.4.7 Establishment posts and records of vetting level requirements

- 3.4.7.a The force must hold details of all posts in the force detailing:
- The member of police personnel who occupies the post.
  - The level of vetting clearance required for the post. The vetting clearance required relates to post-holder duties, level of access to sensitive information and identified risks. It does not relate to the grade or rank of a post.
  - The level of vetting clearance held by the post-holder.
  - The clearance renewal date.
- 3.4.7.b Each role within the force must be assessed to ensure it has the appropriate level of vetting. Any review of role responsibilities of a post or job description must include a review of the appropriate vetting level for that post.

- 3.4.7.c Any new posts should have their vetting requirement assessed after the job description has been finalised. If the new post needs to be added to the **designated posts – list of posts requiring additional considerations**, this should be updated and published locally.
- 3.4.7.d Any vetting requirement for a post should also be considered with reference to the **National Police Chiefs' Council (NPCC) vetting requirements for policing**. This describes the requirements for access to policing assets, including premises, information and information systems.

### 3.4.8 Designated posts – list of posts requiring additional considerations

- 3.4.8.a A review of all force posts must be conducted to ensure that they have been assessed correctly for the vetting level required. This includes whether they require police vetting only, or police vetting and national security vetting (NSV). Posts requiring MV, or **roles working closely with vulnerable individuals** only requiring recruitment vetting (RV) clearance, should be placed on the designated post list.

## 3.5 Expectations of force vetting managers (FVMs)

- 3.5.1 FVMs should ensure decisions made are consistent with this APP and the **NDM**. Any decision to deviate from this APP will require a robust rationale. This must be supported at chief officer level and stand up to scrutiny from His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS). Any such deviations should be readily identifiable and accessible for any audit.
- 3.5.2 FVMs should ensure the following:
- There are confidential processes in place to enable sensitive and honest disclosure by vetting applicants and vetting clearance holders.
  - A full decision rationale is recorded. This should detail risks identified and relevant factors assessed in any vetting decision.
  - The decision to grant clearance remains the responsibility of the FVM or nominated individual. Before granting clearance to an applicant who

has a previous conviction or caution, the vetting file must be passed to the head of professional standards or nominated authority. They must determine if the risk is acceptable – see [Appendix N](#). Where clearance is then granted, this should be clearly marked on the vetting record.

- Periodic sample audits of vetting decisions must be in place. These provide assurance on the proportionality of decision-making, quality of rationale and whether risk mitigation strategies are appropriate and manageable.

3.5.3 Professional role profiles provide general guidance on role purposes, key accountabilities and other expectations for the following:

- [vetting manager](#)
- [vetting supervisor](#)
- [vetting officer](#)

### 3.5.4 Obligations under the Equality Act 2010 and safeguarding against disproportionality

3.5.4.a There is a risk that vetting has a disproportionate impact on underrepresented groups. Without any bias, and while maintaining the standards set out within this APP, forces and FVMs should ensure that every opportunity is taken to support the police service by recruiting and retaining applicants with protected characteristics from underrepresented groups, as defined in the [Equality Act 2010](#).

3.5.4.b To support positive action initiatives, local vetting subject matter experts should actively engage with potential applicants before and during recruitment campaigns. They should explain and clarify the vetting process.

## 3.6 Expectations of elected local policing bodies and chief officers

3.6.1 Under [section 39A of the Police Act 1996](#), chief officers must have regard to the statutory [Vetting Code of Practice](#).

- 3.6.2 Chief officers are required to provide sufficient resources and oversight to ensure the effective delivery of vetting.
- 3.6.3 Paragraph 3.6 of the [Vetting Code of Practice](#) states that PCCs and their statutory deputies do not have to be vetted. However, they are designated as Crown servants under the [Official Secrets Act 1989 \(Prescription\) \(Amendment\) Order 2012](#) and are subject to the requirements of this Act. It does not preclude the PCC and their deputy volunteering to be vetted for the purpose of transparency.
- 3.6.4 All other staff in the elected local policing body (ELPB) must be vetted in accordance with this APP.
- 3.6.5 ELPBs, through their monitoring officer or the chief executive and the FVM, must ensure the chief officer of their force holds and maintains appropriate vetting clearance.
- 3.6.6 For further information, see Home Office (2012) [advice on security vetting and information sharing arrangements with PCCs](#) (login required). This document is security marked official-sensitive. It is available to appropriate police personnel through the restricted access [Professional Standards – Vetting group](#) on Knowledge Hub.
- 3.6.7 In conjunction with the FVM, chief officers must ensure that police officers and staff are vetted to the required level before appointment. They must ensure that non-police personnel hold valid clearance before being granted unsupervised access to police assets. They must also make sure that serving police personnel hold valid vetting clearance.

## 3.7 Expectations of supervisors and vetting sponsors

- 3.7.1 To [support the wider protective security regime](#), supervisors must complete the annual integrity and vetting review with all personnel for whom they are responsible – see [Appendix B](#). They must allow sufficient time for the process to be meaningful. Lack of compliance or engagement by a supervisor may be dealt with through unsatisfactory performance or misconduct processes.

- 3.7.2 Supervisors should ensure they are fully aware of police personnel reporting obligations. They should remind the personnel they have responsibility for of their requirement to disclose to the FVU any matters that may affect their vetting clearance. The supervisor should be supportive, while emphasising the need for compliance.
- 3.7.3 When asked, supervisors must provide an honest and accurate assessment of police personnel, including those who were recently under their responsibility. They must do so within a reasonable timeframe. This may include staff who:
- require MV clearance
  - have submitted a vetting application to another force
  - are moving to a new role working with vulnerable individuals
- 3.7.4 To ensure a robust protective security regime in the police service, it is expected that supervisors set an example, act as role models and challenge or report inappropriate behaviour by colleagues.
- 3.7.5 Supervisors and vetting sponsors are responsible for ensuring that change of circumstances or adverse information are brought to the FVU's attention. This is to ensure that vetting clearance can be maintained.

## 3.8 Expectations of police personnel, agency personnel and volunteers

- 3.8.1 All vetting clearances will be subjected to relevant [vetting reviews](#) and vetting renewal processes. See [renewing police vetting clearances](#).
- 3.8.2 Police personnel, agency personnel fulfilling force establishment roles and volunteers must maintain valid vetting clearance in accordance with this APP, the [Vetting Code of Practice](#) and [The Police \(Vetting\) Regulations 2025](#) or any contract of employment. To ensure adherence to the [standards of professional behaviour](#) and [Code of Ethics](#), all members of the policing profession must act with the highest levels of integrity, ensuring their behaviours, both on and off duty, do not compromise their ability to maintain their vetting clearance. They should,

therefore, disclose all relevant information during the vetting process and throughout the lifetime of the vetting clearance. The vetting applicant's honesty and integrity will be questioned if information is purposely withheld. Potential vulnerabilities are likely to be identified as a result. Where matters of potential risk are freely disclosed during the vetting process and throughout the lifetime of the clearance, potential vulnerabilities may be mitigated.

3.8.3 A vetting applicant's personal circumstances can change at any time. It is therefore important that their ability to maintain vetting clearance is **reviewed at key points** throughout the clearance validity period.

3.8.4 Changes in a vetting clearance holder's personal circumstances must be reported to the appropriate vetting authority as soon as possible. Information provided will be treated in confidence and may include:

- Change of partner, marital status or civil partnership.
- Change of name or address.
- Change of co-resident(s).
- Significant changes affecting a vetting applicant or vetting clearance holder's financial status. Examples include a county court judgement, participation in a debt management plan or being in receipt of unexpected funds not normally received through daily activities.
- Being the subject of, or a person of interest in, a criminal investigation.
- Involvement with police, except in the vetting clearance holder's policing-related role, or as a victim or witness of crime.
- Changes in notifiable associations.
- Any new associations with any individual involved in criminal activity or any person who associates with others involved in criminal activity.
- Involvement in or approaches made by any political, religious or protest group whose aims and objectives may contradict the duty to promote racial, religious and social equality.
- Being the subject of civil proceedings or protective measures, including but not limited to:

- domestic violence protection notice or order
- female genital mutilation protection order
- forced marriage protection order
- non-molestation order
- restraining order
- occupation order
- harassment warning
- sexual harm prevention order
- sexual risk order
- stalking protection order
- slavery and trafficking prevention and risk order
- violent offender order
- anti-social behaviour order
- football spectator banning order

3.8.5 Information provided in confidence will be handled as sensitively as possible. However, on occasion it will be both proportionate and necessary to disclose information to other units. These may include professional standards, counter corruption, HR and the occupational health unit (OHU). This may occur, for example, where the notification of a change of circumstances relates to the vetting applicant breaching the [standards of professional behaviour](#). The FVM will maintain a documented rationale for any such disclosures. Where other police units or departments become aware of such information, they should bring this to the attention of the FVU.

3.8.6 Failing to disclose relevant information may result in a referral for misconduct. This could lead to vetting clearance being downgraded or withdrawn. See [reviewing vetting clearance following misconduct](#).

3.8.7 Information may be identified that could affect suitability of police personnel or volunteers to maintain vetting clearance. Those aware of this information, especially supervisors, must inform the relevant vetting

authority. The information should be treated with the appropriate level of sensitivity and security in accordance with the [DPA 2018, government security classifications](#) (GSC) and relevant force policies.

3.8.8 Police and agency personnel must comply with the annual integrity and vetting review process. Engagement will be recorded and monitored in force. Serving police personnel failing to engage or comply with the annual integrity and vetting review process, without reasonable justification, may be subject to unsatisfactory performance or misconduct processes. Their current police vetting clearance may be invalidated and withdrawn as a result.

3.8.9 Police and agency personnel and volunteers must provide honest and accurate responses to vetting queries and requests in a reasonable timeframe. The FVU will ask for new or further information to maintain or reassess current vetting clearance. Failure to engage with the continual vetting process may lead to clearances being withdrawn.

## 3.9 Expectations of non-police personnel

3.9.1 Individuals not appointed or directly employed by the police service, but requiring unsupervised access to police assets, must comply with the vetting process. They are referred to as 'non-police personnel', and include contractors, consultants and partner agencies who work closely with, or share premises with, the police service. Assets include information, systems and premises. Unsupervised access must not be granted until vetting clearance has been obtained. Where vetting clearance is declined or withdrawn, forces should not grant unsupervised access.

3.9.2 Vetting clearances obtained by non-police personnel must be maintained by reporting any relevant changes in personal circumstances, in writing, to their vetting authority. For examples, see [3.8.4](#). Focused vetting reviews must be completed on receiving notification, to assess continued suitability to hold clearance. Failure to report such changes could result in the withdrawal of vetting clearance. Non-police personnel vetting (NPPV)

level 3 clearance holders are also required to sign and return an [NPPV level 3 annual vetting notice](#) declaration to maintain clearance.

## 3.10 Expectations of applicants for vetting clearance

3.10.1 Applicants for roles requiring vetting clearance must comply with the vetting process. They must:

- Provide complete and accurate information in response to all vetting enquiries.
- Notify the relevant vetting authority of any changes in their circumstances relating to information provided as part of the vetting process as soon as possible. For examples, see [3.8.4](#)

3.10.2 Vetting applicants who fail to comply with the process will not be granted vetting clearance. Their application for employment or appointment will not continue. Vetting clearances can be declined or withdrawn any time if there is evidence that misleading, incomplete or inaccurate information was provided, or relevant information was withheld. If the vetting applicant has already been employed or appointed, they may be referred for misconduct.

3.10.3 Clearance can also be withdrawn if information about a relevant change of circumstances is withheld intentionally between clearance being granted and employment or appointment starting.

3.10.4 If a new vetting applicant is currently under investigation for an offence, including being on police bail, their vetting application will be discontinued. A new vetting application may be submitted once the matter is finalised.

## 3.11 Expectations of independent legally qualified persons and independent panel members of misconduct hearings

3.11.1 Independent legally qualified persons involved in misconduct hearings, and independent panel members, do not require vetting. [See 5.8.1.c.](#)

## 4. Vetting regimes

4.1 There are two vetting regimes police FVUs facilitate for the police service:

- **police vetting** – designed to protect the public, police assets and police information
- **national security vetting** (NSV) – designed to protect government assets

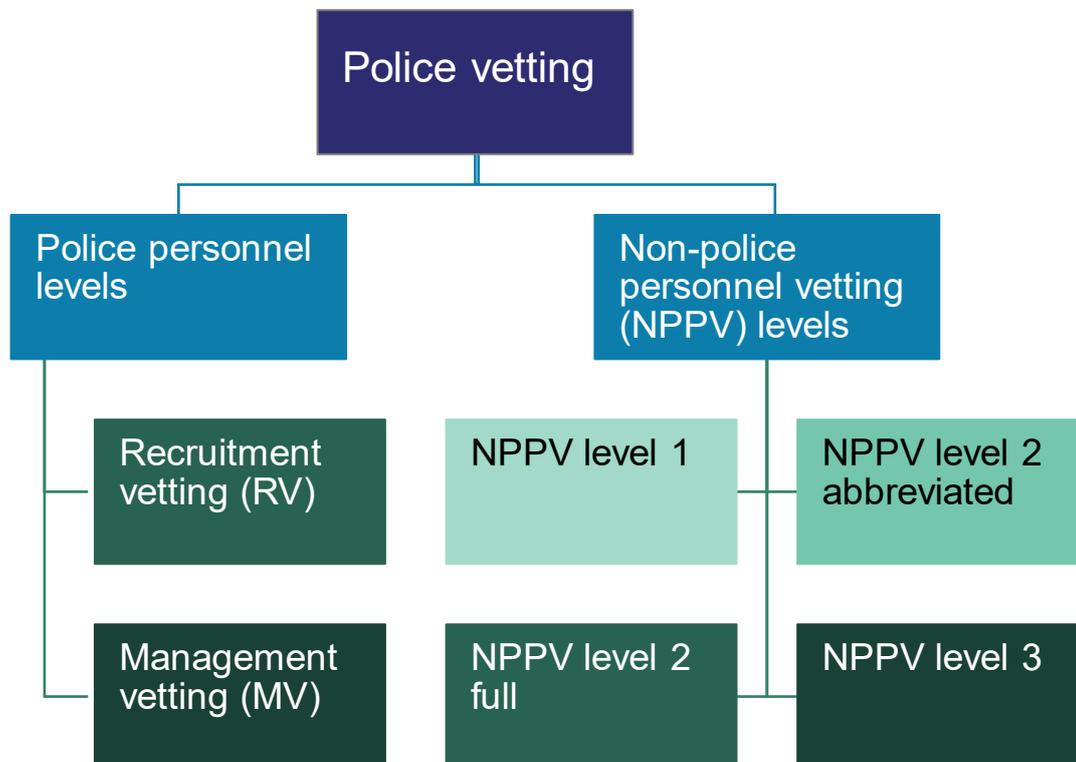
4.2 There is some commonality between the threats posed to police assets and government assets. However there are also differences, with the police service identifying a much broader range of threats. Therefore the two regimes have different decision-making criteria and information sources.

## 5. Police vetting

- 5.1. Police vetting assesses the conduct, honesty, integrity, trustworthiness, maturity, reliability and overall suitability for clearance of all those working in or with policing. This includes considering those working with the public who may pose a threat to the trust and confidence in, and reputation of, policing. Additionally, consideration will be given to any potential risks posed by the activity of individuals with whom those seeking clearance are associated.
- 5.1.1 Vetting also assesses the threat and risks associated with allowing unsupervised physical or remote access to any of the following police:
- premises
  - information
  - intelligence
  - financial or operational assets
  - corporate databases
  - data networks
  - hard-copy material
- 5.1.2 Under no circumstances can the requirement for police vetting be negated by a clearance conducted under any other vetting regime.

## 5.2 Police vetting levels

5.2.1 There are two categories of police vetting applicable to the police service, each with different clearance levels.



5.2.2 Some individuals also require access to government assets. Where this is the case, the appropriate level of NSV is applied. For further information, see [national security vetting](#).

5.2.3 Police vetting considers wider and more comprehensive threats to policing than NSV. Therefore, police vetting clearance decisions should be completed before finalising police-sponsored NSV clearance.

5.2.4 Individuals do not require police vetting clearance if they do not need unsupervised access to police information, systems or premises. They do not require police vetting clearance if they do not represent policing in their role.

5.2.5 [Appendix H – national digital vetting form section catalogue](#) stipulates which sections of the [Appendix I – police vetting form questions and guidance](#) to complete for different police vetting levels.

## 5.3 Eligibility for police vetting

- 5.3.1.a All vetting levels in the police service are underpinned by the **authentication** procedure, which must be completed before vetting enquiries are initiated.
- 5.3.1.b If during the recruitment process a vetting applicant declares information about their criminal record or financial situation that makes vetting clearance unlikely, it can be shared with the FVU. A pre-employment check can then be carried out by the FVU. This check does not form part of the vetting process.

### 5.3.2 Residency criteria

- 5.3.2.a To undertake police vetting, applicants are required to have been resident in the UK for a specific time period immediately before an application is made. The residency criteria set out below comes from the need to apply vetting standards to all vetting applicants equitably. This is because the UK police service cannot routinely facilitate vetting enquiries overseas to the same level as it can for those who are resident in the UK.
- 5.3.2.b The residency criteria ensures that applicants have a **checkable history** in the UK. This allows for meaningful vetting enquiries. The criteria provides reassurance when considering risks posed to police personnel and the public. Effective vetting can only be conducted if it is possible to assess a vetting applicant's honesty, integrity, reliability and overall suitability for clearance against available information.
- 5.3.2.c For the purposes of police vetting, the following residency requirements apply:
- non-police personnel vetting – three years
  - recruitment vetting – three years
  - management vetting – five years
- 5.3.2.d For NSV, the **HMG personnel security controls guidance** sets out the minimum UK residency periods required before meaningful checks at various levels can be completed. Departments and agencies should

exercise discretion when vetting applicants have not resided in the UK for the following periods:

- counter terrorist check (CTC) or level 1B (L1B) – three years
- security check (SC) – five years
- developed vetting (DV) – 10 years

5.3.2.e The residency requirements refer to the period immediately before an application is made. It does not refer to any other three-, five- or 10-year period, or any other accumulation of time spent in the UK.

### 5.3.2.1 Application of the residency criteria

5.3.2.1.a The vetting applicant should provide address history information. A copy should be maintained on the vetting file.

5.3.2.1.b If the vetting applicant resides permanently in the UK, they are considered to be resident in the UK.

5.3.2.1.c If the vetting applicant has lived outside the UK while serving with the armed forces or on government service, they are considered resident in the UK. See [residency and service with HMG or the armed forces](#).

5.3.2.1.d Vetting applicants who spent around 12 months overseas without returning to the UK, but who intend to, or return afterwards, should be considered as having taken an extended holiday. They therefore maintain residency in the UK. Examples of extended holidays may include, but are not limited to:

- taking a gap year or similar, before or following university
- travelling overseas for a year
- spending time overseas visiting family

Vetting applicants who meet the above criteria maintain their UK residency and may be considered for vetting clearance.

5.3.2.1.e A vetting applicant who moved overseas and severed major ties to the UK is considered, for vetting clearance, to have surrendered their UK residency. Severing major ties includes closing bank accounts and selling

property. This also applies to those with bank accounts that exist purely to receive regular payments, for example a UK pension.

5.3.2.1.f Where the vetting applicant does not meet the residency criteria, it may be proportionate to conduct all necessary vetting enquiries with relevant overseas jurisdictions where there is the facility to do so. See [5.3.3.c](#). In such cases, the minimum residency period for police vetting levels can be removed.

5.3.2.1.g Where the vetting applicant meets the residency qualification but identifies a period of residency outside the UK, consideration should be given to undertaking checks through the [ACRO Criminal Records Office](#). Overseas convictions should be considered on a case-by-case basis. Due regard should be given to the nature of the offence, age of the conviction and jurisdiction where it was tried.

### 5.3.2.2 Residency and service with HM Government or the armed forces

5.3.2.2.a A vetting applicant who has been posted overseas as part of their service with HMG or the armed forces is considered to have been resident in the UK while abroad. Reference to members of the armed forces includes civilian personnel accompanying a force as part of a civilian component or equivalent.

5.3.2.2.b Where a vetting applicant has been overseas as the spouse, partner or dependant of a member of the armed forces posted overseas, it may be possible to obtain the necessary assurance for a checkable history to be established. In such cases, contact should be made with the Ministry of Defence (MoD) to ascertain what checks can be made through the local authorities of the host nation where the vetting applicant was resident. Where sufficient enquiries can be made to satisfy the checkable history criteria, these should be completed through the relevant personnel vetting authority, via the MoD.

5.3.2.2.c Vetting enquiries, as outlined above, can also be completed for the vetting applicant's family members residing overseas as part of an overseas posting, tour-of-duty or military deployment.

5.3.2.2.d Where the vetting applicant's family members are resident in foreign jurisdictions or overseas due to posting, tour-of-duty or military deployment, the potential risk is mitigated by geographical distance. Where the vetting applicant meets the checkable history requirements, if vetting enquiries cannot be undertaken for family members residing abroad this should not ordinarily result in declined clearance.

### 5.3.2.3 Considerations to be made when applying the residency criteria

5.3.2.3.a In exceptional circumstances, consideration can be given to applying discretion to the residency requirement. The reasons for discretion and appropriate risk assessment should be made clear and recorded in the vetting file. This should be done before starting the vetting process. Such a decision may be made in consultation with HR.

5.3.2.3.b Where professional discretion is applied, a risk assessment must be recorded. This must include conducting predetermined periodic reviews until the vetting applicant meets the minimum residency requirement. It is unlikely that the vetting applicant will attain any level of vetting clearance requiring additional scrutiny under police vetting or NSV regimes, until they satisfy the residency criteria. Where the residency criteria are enforced and vetting enquiries cannot be completed, the vetting applicant should be provided with the rationale for this. They should be encouraged to reapply when they meet the residency criteria.

### 5.3.2.4 Residency discretion and ability to transfer between forces

5.3.2.4.a Where discretion is applied in accordance with this APP, to grant RV and the appointment is made, the vetting applicant's ability to transfer between forces may be limited. Each transfer is considered on a case-by-case basis. This is because the decision to appoint was made according to a local need, based on the attitude to risk applied in the originating force.

### 5.3.2.5 Residency considerations for national security vetting requirements

5.3.2.5.a NSV enquiries may not be possible even where forces obtain a checkable history for a vetting applicant who does not meet the minimum residency criteria. FVMs should therefore carefully consider whether NSV clearance can be granted. The NSV residency criteria can be found at [5.3.2.e](#).

### 5.3.3 Checkable history

5.3.3.a Checkable history applies to police vetting to support the legitimacy of the checks required during the vetting process. Forces must apply checkable history equally to all vetting applicants, regardless of nationality.

5.3.3.b It is not currently possible to make meaningful vetting enquiries in many jurisdictions outside the UK. The checkable history criteria accounts for this risk area.

5.3.3.c Checkable history correlates with the residency criteria, however there are differences. If the vetting applicant has not been resident in the UK for the relevant minimum period – see [5.3.2.e](#) – but sufficient comparable vetting enquiries can be made in jurisdictions where the vetting applicant has lived, they may be considered to have a meaningful checkable history. This provides legitimacy to the police vetting process. Sufficient comparable vetting enquiries are only possible where information can be obtained in the relevant jurisdictions equivalent to that available in the UK. These may be obtained through local law enforcement and national security bodies. Sufficient comparable vetting enquiries are required for:

- credit reference agencies
- verification of the vetting applicant's address history
- employment references for the vetting applicant
- their family members and associates where necessary

5.3.3.d Where the vetting applicant does not have sufficient checkable history because they have not resided in the UK for the relevant minimum period – see [5.3.2.e](#) – any clearance granted would not provide sufficient assurances. Therefore, in almost all cases it would be inappropriate to

grant the vetting applicant a level of police vetting clearance. For further information, see [considerations to be made when applying the residency criteria](#).

## 5.4 Police personnel vetting levels

### 5.4.1 Recruitment vetting (RV)

- 5.4.1.a RV clearance is the minimum level of police vetting required for police officers, police staff and special constables to be recruited and maintain employment or service. It allows unsupervised access to police assets, estates and information required for these roles. RV clearance assesses that individuals pose no unacceptable, identifiable threat to the trust and confidence of the public in, and reputation of, policing.
- 5.4.1.b RV clearance allows regular access to police assets, material and information classified up to official-sensitive and occasional access to 'secret'.
- 5.4.1.c NSV CTC or L1B may be applied to RV clearance where appropriate.
- 5.4.1.d The clearance validity period is 10 years. However, it must be regularly maintained through [annual integrity and vetting reviews](#) and [focused vetting reviews](#) when there has been a notification of change of circumstances relating to vetting assessment factors.
- 5.4.1.e RV must be renewed on expiry if the individual maintains employment with, or appointment to, policing. A renewal requires the completion of a new vetting application form and all vetting enquiries detailed in this APP.

### 5.4.2 Management vetting (MV)

- 5.4.2.a The purpose of MV is to provide additional assurances when assessing the integrity, reliability and potential for financial vulnerability of vetting applicants. This applies to those serving in posts with access to sensitive police premises, information, intelligence and financial or operational assets, where:
- the risk of potential compromise of those assets is high

- the risk of serious damage to the force is substantial

5.4.2.b Serious damage is defined as:

- frustrating the prevention and detection of serious, organised or major crime
- frustrating the apprehension or prosecution of such offenders
- causing significant financial loss to the force
- unlawful or inappropriate awarding of contracts
- otherwise adversely affecting the operational capability, reputation or security of the force

5.4.2.c MV clearance is likely to be required for posts that have regular, broad, unrestricted, uncontrolled and/or significant levels of:

- access to intelligence concerning covert or sensitive operations
- access to material classified 'secret' or above
- access to source material and true source identities
- access to sensitive information relating to high-profile or sensitive matters, such as royal visits or critical national infrastructure
- access to highly sensitive information about individuals
- influence over the management or awarding of contracts
- dealings with financial matters, such as access to budgets, authorisation of payments or receipts of income
- access to sensitive material concerning the police service
- access to assets requiring NSV level SC or DV
- access to police IT infrastructure

5.4.2.d All police personnel with long-term, frequent and uncontrolled access to 'secret' police assets, and occasional access to 'top secret' police assets, should hold MV clearance.

5.4.2.e MV is a prerequisite level of clearance for police personnel who require SC or DV clearance. If MV clearance cannot be obtained, NSV clearance cannot be granted by a police sponsor. Where DV is held, and SC in

specific instances, completing the [UK security vetting \(UKSV\) annual security appraisal](#) is required to maintain national security clearance.

This is a separate, additional process to the local annual integrity and vetting reviews – see [11.9.2](#).

5.4.2.f Examples of posts that require the vetting applicant to obtain and maintain MV clearance include:

- police personnel who:
  - award contracts
  - handle sensitive financial assets
  - have access to sensitive intelligence as part of an investigation (for example, serious and organised or major crime units)
  - are informant handlers
  - work in counter corruption
  - work in counter terrorism
- police vetting staff
- authorised firearms officers
- firearms commanders and advisors
- public order and public safety commanders and advisors

Posts assessed as requiring MV clearance should feature on the [designated posts – list of posts requiring additional considerations](#).

5.4.2.g The clearance validity period is seven years. It must be regularly maintained through [annual integrity and vetting reviews](#) and [focused vetting reviews](#) when a change of circumstances relates to vetting assessment factors.

5.4.2.h MV must be renewed on expiry if the individual maintains employment with, or appointment to, policing. A renewal requires the completion of a new vetting application form and all vetting enquiries detailed in this APP.

5.4.2.i To grant MV clearance, the force should ensure that they have no reason to doubt the integrity of the vetting applicant or their susceptibility to improper external influences. There may be cases where MV clearance

has been granted following the assessment of potential risk and/or risk mitigation measures are implemented. Risks should be reassessed before the individual is authorised to move to another post during the full vetting review – see [7.2.2](#).

## 5.5 Police personnel roles with prescribed vetting level requirements

### 5.5.1 Vetting of chief constables

- 5.5.1.a Chief constables must hold MV and DV clearance. The monitoring officer, or the chief executive from the ELPB, is the decision maker for approving clearance. The FVM provides support and guidance to the monitoring officer and manages and coordinates enquiries for a chief constable's vetting clearance.
- 5.5.1.b Chief constables or their equivalents transferring between forces are subject to the vetting requirements set out under [transferees](#). Their vetting clearance requires an annual security appraisal to maintain DV clearance – see [11.9.2](#). This is managed between the FVM and monitoring officer or chief executive of the ELPB.
- 5.5.1.c Guidance on reciprocal vetting of chief constables can be found under [reciprocal vetting of chief constables](#).

### 5.5.2 Vetting of other chief officers

- 5.5.2.a Deputy chief constables (DCCs), or their equivalents, must hold MV and DV clearance as they are required to deputise for the chief constable.
- 5.5.2.b Other chief officers, both warranted and non-warranted, must hold a minimum level of MV and SC clearance. DV clearance may be applied if the post requires it. The chief constable is the vetting decision maker for all other warranted and non-warranted chief officers in their force.
- 5.5.2.c Responsibility for completing clearance for chief officers other than the chief constable is delegated to the FVM. The chief constable should be

consulted over the clearance decision on an exceptional basis, particularly where adverse information has been revealed or consideration is being given to declining clearance.

### 5.5.3 Attendance at College of Policing executive leadership programme

5.5.3.a The minimum clearance levels for UK police force delegates attending the executive leadership programme is MV and SC. Individual forces must ensure that their delegates are vetted to the required standard before attending.

### 5.5.4 Roles working closely with vulnerable individuals

5.5.4.a Roles in policing often have contact with vulnerable individuals. Both RV and MV clearance consider identified risks to those who are vulnerable.

5.5.4.b All vetting decisions must consider protecting the public. This helps ensure the vetting process supports the public's confidence in the police service.

5.5.4.c Some policing roles involve working more closely and regularly with members of the public, often at times when they are at their most vulnerable. Individuals in these roles have greater opportunity than most police personnel to form inappropriate relationships, or otherwise abuse their position. Roles or departments to consider include those relating to domestic abuse, child abuse or school liaison or volunteer police cadet leaders. If there is a short-term attachment to such a department, the expectation is that any risk would be mitigated. This is because the individual is unlikely to have long-term engagement with vulnerable people, and they will likely be accompanied by another member of police personnel. If an attachment differs from this, the FVU should assess the vetting requirement. Those who have short-term engagement with the public in times of crisis, such as response or neighbourhood officers or call handlers, do not meet the criteria of working closely with vulnerable individuals.

- 5.5.4.d Roles that meet the criteria in [5.5.4.c](#), but do not meet the criteria for MV clearance, require these additional risk management activities:
- a full vetting review prior to moving into the role or department, regardless of current vetting clearance held
  - supervisor appraisal for currently serving personnel
- 5.5.4.e When assessing suitability to move to such roles, FVUs should have no cause for concern about the vetting applicant's attitudes, behaviours, respect and courtesy towards colleagues or the public.
- 5.5.4.f [Roles working closely with vulnerable individuals](#) should feature on the [designated posts – list of posts requiring additional considerations](#).

## 5.6 Non-police personnel vetting (NPPV)

- 5.6.1 NPPV is applied to anyone other than police officers, police staff and members of the Special Constabulary who require a level of police vetting clearance.
- 5.6.2 Non-police personnel include, but are not limited to:
- agency personnel
  - statutory crime and disorder partners
  - those working in government departments and agencies
  - criminal justice partners
  - third-party agents
  - staff of ELPBs, depending on role
  - contractors
  - consultants
  - auditors
  - researchers
- 5.6.3 Costs incurred by a police force when processing vetting checks for contracted staff may be charged to the contractor. This is in accordance with the NPCC national guidelines on charging for vetting. These are

published on the [Police National Vetting Service \(PNVS\) website](#). See [5.7 – Police National Vetting Service](#).

5.6.4 Forces may review non-police personnel clearance at any point during the lifetime of the clearance. This should not incur a charge.

5.6.5 Non-police personnel sometimes work across multiple forces in the same capacity they were vetted for. Clearance conducted in one force area can be shared with other forces, without needing to transfer clearance, if all involved forces agree. This applies where they have been vetted in accordance with the [Vetting Code of Practice](#) and this APP.

5.6.6 Where NPPV clearances require a new sponsoring force, a new vetting application form should be completed with the new sponsor force.

5.6.7 NPPV roles vary considerably across policing. Assessment of the requirements and risks should be completed on a case-by-case basis. Consideration should be given to the level applied to each role, and to the information, intelligence and assets the vetting applicant will have access to. This ensures that non-police personnel are not subjected to a disproportionate level of vetting.

5.6.8 If non-police personnel decline to be vetted, their access to police assets will be restricted. They can only be given access to police premises as an escorted visitor.

### 5.6.9 NPPV level 1

5.6.9.a NPPV level 1 clearance allows unescorted access to non-sensitive police premises, but no access to classified information.

5.6.9.b Examples include:

- plumbers
- vehicle recovery operators
- removal personnel
- volunteers, depending on role and risk

5.6.9.c Clearance is valid for three years. It must be reviewed when there has been a change of circumstances relating to vetting assessment factors. See [focused vetting reviews](#).

## 5.6.10 NPPV level 2 abbreviated

5.6.10.a NPPV level 2 abbreviated clearance allows regular, unescorted access to non-sensitive police premises. It allows access to police material or information up to official-sensitive, either on police premises or by remote access.

5.6.10.b NPPV level 2 abbreviated clearance is not a sufficient vetting level to allow systems access.

5.6.10.c Clearance is valid for three years. It must be reviewed when there has been a change of circumstances relating to vetting assessment factors. See [focused vetting reviews](#).

## 5.6.11 NPPV level 2 full

5.6.11.a NPPV level 2 full clearance allows regular, unescorted access to non-sensitive police premises. It allows unsupervised access to police systems required as part of the role.

5.6.11.b NPPV level 2 full clearance allows access to police material or information classified up to official-sensitive, and occasional access to 'secret'.

5.6.11.c NSV level 1B or CTC may be applied to NPPV level 2 full clearance where appropriate.

5.6.11.d Clearance is valid for three years. It must be reviewed when there has been a change of circumstances relating to vetting assessment factors. See [focused vetting reviews](#).

5.6.11.e Where agency personnel undertake responsibilities of establishment roles requiring [RV clearance](#), NPPV level 2 full clearance is the comparable NPPV level. Such vetting applicants should be treated as police personnel when considering application of local risk management policies and [annual integrity and vetting reviews](#).

## 5.6.12 NPPV level 3

- 5.6.12.a NPPV level 3 clearance allows regular unescorted access to sensitive police premises. It allows unsupervised access to police systems required as part of the role.
- 5.6.12.b NPPV level 3 clearance allows access to police material or information classified up to 'secret', and occasional access to that classified as 'top secret'.
- 5.6.12.c Clearance is valid for seven years. It must be regularly maintained through an [NPPV level 3 annual vetting notice](#). [Focused vetting reviews](#) must take place when there is a change of circumstances relating to vetting assessment factors.
- 5.6.12.d Any NSV level may be applied to NPPV level 3 clearance if required and may be subjected to the [annual security appraisal](#) requirement to maintain the national security clearance. NPPV 3 clearance is a prerequisite to obtaining an SC or DV clearance through a police sponsor. See [national security vetting](#).
- 5.6.12.e Where agency personnel undertake the responsibilities of establishment roles requiring [MV clearance](#), NPPV level 3 clearance is the comparable NPPV level. Such vetting applicants should be treated as police personnel when considering application of local risk management policies and [annual integrity and vetting reviews](#).
- 5.6.12.f To grant NPPV level 3 clearance, the force should ensure that they have no reason to doubt the integrity of the vetting applicant or their susceptibility to improper external influences.

## 5.7 Police National Vetting Service (PNVS)

- 5.7.1 The NPCC has agreed that Warwickshire Police will:
- vet non-police national contractors to a level appropriate to the requirements of this APP
  - act as an authority in that respect on behalf of all police forces in England, Wales, Scotland and Northern Ireland

5.7.2 Contractors vetted by **the PNVS** are accepted by all forces. This removes the need for forces to duplicate vetting.

## 5.8 Non-police personnel roles with prescribed vetting level requirements

### 5.8.1 Non-police personnel who do not need to be vetted

5.8.1.a Non-police personnel do not need to be vetted when they are admitted to police premises, if they are:

- accompanied
- remain under constant supervision
- not permitted access to police information systems or material that is not in the public domain

In these circumstances, existing procedures for the reception of visitors should apply.

5.8.1.b Expert witnesses, legal representatives and others, such as appropriate adults, who are in private consultation with their clients, do not need to undergo police vetting.

5.8.1.c Individuals provided police information by the police in the course of their professional duties, solely to perform those duties, do not need to undergo police vetting. This only applies where information is not obtained through direct access or searching police systems themselves. Individuals are expected, however, to handle that information in line with the requirements of their professional codes of conduct, DPA and GDPR.

### 5.8.2 Individuals appointed by the elected local policing body (ELPB)

5.8.2.a NPPV clearances can be applied to personnel who are employed or appointed by the ELPB if their role requires it. These may include ELPB staff, custody visitors and members of ethics committees. If the applicant fails the vetting process, the PCC decides whether or not an individual is

suitable for an appointment. They should consult with the chief constable, DCC or senior risk officer (SRO) before making the decision.

- 5.8.2.b Only the chief constable, the DCC or SRO, with advice from the FVM, can authorise unsupervised access to police information, premises or assets if clearance is declined.

### 5.8.3 Volunteer police cadets

- 5.8.3.a The **volunteer police cadets** (VPC) scheme is a national programme for young people aged eight to 18 years. The NPCC-agreed aims and principles define the VPC scheme's purpose. One of its aims is to inspire young people to participate positively in their communities. It is accepted that participants will include young people at risk of offending or reoffending, who may be from families with criminal backgrounds. The VPC scheme therefore operates outside of the **Vetting Code of Practice** and this APP.

- 5.8.3.b The VPC scheme is not a recruitment vehicle for the police service. Cadets will not have unsupervised access to police premises, assets or IT systems. Adult cadet personnel will risk assess and supervise events where cadets are in uniform and could be viewed as representing the force.

- 5.8.3.c Forces running similar schemes locally that have not adopted the VPC scheme are recommended to vet cadets to NPPV level 1. Vetting decisions should seek to balance findings on the applicant with the aims and principles of the local scheme.

### 5.8.4 Cadet leaders

- 5.8.4.a Cadet leaders require NPPV clearance, even if they already hold RV or MV, unless the role of cadet leader is performed under the direction and control of the chief constable. If the role of cadet leader is not under the direction and control of the chief constable, DBS clearance must also be arranged through appropriate channels outside of the FVU. See **5.10.3**.

- 5.8.4.b The role of cadet leader is a regulated activity under the **Safeguarding Vulnerable Groups Act 2006**. Employing individuals, or allowing them to volunteer, in regulated activity roles is a criminal offence if they are barred by the DBS. The DBS barred list is available through the PND, however can only be checked as part of the vetting process for RV or MV clearance. The DBS barred list cannot be checked for those who are subject of NPPV clearance and a separate DBS clearance is required for these cadet leaders.
- 5.8.4.c Once they reach the age of 18, cadets can become cadet leaders.
- 5.8.4.d Where risks are identified during vetting for ex-cadets applying to become cadet leaders, the VPC coordinator should be consulted. This is to ensure that their record as a cadet is taken into consideration.

## 5.9 Granting of vetting clearance

- 5.9.1 Vetting clearances must be granted before a vetting applicant is appointed, employed or otherwise authorised to access police premises or information that is not in the public domain, or work with the public as a representative of policing.
- 5.9.2 To avoid undue delays in police business, vetting applications need to be processed in a timely manner.

## 5.10 Disclosure and Barring Service (DBS) checks

- 5.10.1 Where posts require DBS checks, the RV or MV is sufficient if the post is under the direction and control of the chief constable. It incorporates checks against the DBS barred list on the PND. Further DBS checks are not required.
- 5.10.2 If police personnel vetted to RV or MV are required to work with vulnerable groups, their police vetting clearance should be sufficient. This applies so long as the requirements under **roles working closely with vulnerable individuals** have been met and maintained. An example of a role working with vulnerable groups is a school liaison officer working with children.

- 5.10.3 If the role is not under the direction and control of the chief constable and it meets the statutory criteria for DBS checks, these will need to be completed through appropriate channels outside of the FVU. This should be done in addition to any NPPV clearance.
- 5.10.4 If police personnel vetted to RV or MV are performing regulated activity for other bodies, not under the direction and control of the chief constable, their police vetting clearance does not apply. Appropriate DBS checks are required. Examples include undertaking voluntary work or working for a charity.

## 6. Police vetting processes

This section includes guidance on the different vetting checks and assessments that have to be followed for a vetting applicant to be granted the appropriate level of vetting clearance. In some cases, vetting clearance can be granted with conditions, withdrawn or declined.

### 6.1 Commencement of police vetting

6.1.1 The vetting process should not start before the recruitment and assessment stages of the onboarding process are complete. Vetting will always be conducted as close as possible to the start of a vetting applicant's appointment or employment. This ensures current information and risks are considered.

6.1.2 The vetting applicant may declare matters such as convictions, criminal investigations, financial issues or previous roles in the police service. In such cases, FVUs should make an initial vetting assessment when the application is received. They should ascertain whether it should progress or if external enquiries need to be made.

### 6.2 Maintaining records

6.2.1 A template vetting decision record form is included in [Appendix K](#).

6.2.2 FVUs must record:

- Information provided by the vetting applicant.
- The results of vetting enquiries.
- A detailed rationale for declining, suspending, withdrawing or granting clearance, including details of any restrictions or conditions.
- Granted vetting clearance levels and renewal dates for each vetting applicant.
- Details of any [vetting reviews](#) throughout the clearance period.
- Details of vetting appeals received, the appeal considerations and outcome, both in a manner to provide management information and a full account.

- A detailed rationale where adverse information has been revealed and considered. This must note all identified risks and take account of all relevant factors in the vetting decision. It must reference relevant sections of this APP or any relevant policy or legislation considered when recording the decision. For further information regarding the decision rationale, see [Appendix M](#).
- A record of withdrawal assessments, including the decision on the outcome and the finding in any appeal.
- A record of police personnel who have resigned or retired prior to the conclusion of any withdrawal assessment procedure.

6.2.3 Where the vetting applicant has previous criminal convictions, adverse information or other risk factor, it must be clearly identifiable in vetting case management systems.

6.2.4 The full vetting decision rationale will form part of the vetting file. Where the full decision rationale cannot be provided to the vetting applicant, forces should prepare a decision disclosure sheet suitable for disclosure on request. The decision disclosure sheet should contain as much information as possible from the rationale, even if this is only summary information. In such cases, a record of considerations of which information can be disclosed should also be kept with the vetting file. It may be necessary to seek advice on disclosure from the force data protection officer. See [6.3 – Disclosure of information to the vetting applicant](#).

6.2.5 Vetting files can be stored physically or electronically and must be maintained securely. Access should be limited to those with a business need. Vetting files should be stored separately to personnel files due to the sensitive material they contain.

6.2.6 Vetting files should be kept for no longer than is necessary. See [Information management APP](#). The content of vetting files may be disclosed:

- during legal proceedings

- during police misconduct or counter corruption investigations
- following a right of access request

6.2.7 FVUs should develop a retention schedule for vetting records in accordance with information management principles. See [police information and records management Code of Practice](#), [information management APP](#) and where relevant, the [UKSV data retention policy](#).

## 6.3 Disclosure of information to the vetting applicant

6.3.1 Information relating to the vetting applicant discovered during the vetting process can be discussed or disclosed to them, unless non-disclosure is:

- necessary to prevent the premature or inappropriate disclosure of information that is relevant to, or may be used in any:
  - criminal proceedings
  - misconduct proceedings, or
  - an accelerated misconduct hearing.
- necessary in the interests of national security.
- necessary for the purpose of the prevention or detection of crime, or the apprehension or prosecution of offenders.
- necessary for the prevention or detection of misconduct by other police officers or police staff members or their apprehension for such matters.
- justified on the grounds that providing the information would involve disproportionate effort in comparison to the seriousness of the matter concerned.
- necessary and proportionate for the protection of the welfare and safety of any informant, witness or any other third party.
- otherwise in the public interest.

6.3.2 Where information has intentionally been withheld from the vetting applicant when requested or required, a rationale should be recorded to support the decision. The threshold of providing no information, rather than at least indicative or redacted information, remains high. In cases

where information relates to a third party, the FVU should assess the information available in the public domain. This is to allow as full disclosure as possible to the vetting applicant. If uncertain about disclosing information, the FVM should seek advice from their legal or information governance departments. See [Appendix F](#).

6.3.3 In extreme cases, it may be appropriate to mitigate specific risks, for example, a risk to life, by disclosing third party information to the vetting applicant. This decision should only be made following authorisation from the force data protection officer. They must consider all risks and legislative constraints, such as the DPA, GDPR and GSC. Information obtained from external agencies should not be disclosed unless authority to do so has been obtained from those agencies.

## 6.4 Authentication

6.4.1 Authentication is not a formal security clearance, but it underpins all levels of police vetting and NSV. It must be completed before the vetting process is started, to validate the integrity of vetting checks.

6.4.2 Authentication is used to confirm the vetting applicant's identity, nationality, employment eligibility and [residency qualification](#). It does not allow access to police information that is not in the public domain or unescorted access to any police premises.

6.4.3 It is the responsibility of HR, the employer or other internal sponsor to ensure that authentication takes place and is fully verified before vetting forms are initiated or forwarded to the FVU. Authentication comprises three stages. The information collected should be reviewed and assessed between each stage. The stages should be carried out in the order shown below:

- identity check
- nationality check
- employment eligibility

6.4.4 Completing this procedure satisfies the requirements of the [national identity and access management service \(IAM\)](#).

6.4.5 There is no requirement to re-verify the vetting applicant's identity for IAM purposes unless there has been a change of name.

## 6.5 Standard checks and assessments

This table provides the standard checks and assessments of each vetting level.

Additional checks and assessments where relevant or applicable are denoted by \*

	Police personnel		Non-police personnel				All
	RV	MV	NPPV 1	NPPV 2 abbreviated	NPPV 2 full	NPPV 3	Full vetting review
	System checks and assessments on applicant						
Police National Computer (PNC) check	✓	✓	✓	✓	✓	✓	✓
PND check and other force enquiries	✓	✓	✓	✓	✓	✓	✓
Police intelligence records and other non-conviction databases check (including home address)	✓	✓	✓	✓	✓	✓	✓
Electoral register and co-residents check	✓	✓			✓	✓	
Counter Terrorism Unit check	✓	✓	✓	✓	✓	✓	
Credit reference check	✓	✓			✓	✓	✓
Open source enquiries	✓	✓			✓*	✓*	✓
Professional standards department (PSD) checks*	✓	✓	✓	✓	✓	✓	✓
Counter Corruption Unit (CCU) checks*	✓	✓	✓	✓	✓	✓	✓
MoD check*	✓	✓	✓	✓	✓	✓	

	Police personnel		Non-police personnel				All
	RV	MV	NPPV 1	NPPV 2 abbreviated	NPPV 2 full	NPPV 3	Full vetting review
ACRO check*	✓	✓	✓	✓	✓	✓	
Barred and advisory CMS check*	✓	✓	✓	✓	✓	✓	
	Other checks and assessments on applicant						
Consideration of financial position	✓	✓			✓	✓	✓
Full financial checks		✓				✓	
Assessment of risk to vulnerable individuals	✓	✓	✓	✓	✓	✓	✓
Annual integrity and vetting review	✓	✓			✓*	✓*	
Business interest and additional employment consideration*	✓	✓			✓*	✓*	
Liaison with occupational health*	✓	✓					
Supervisor appraisal*	✓	✓			✓	✓	✓
Crime report allegations*	✓	✓	✓	✓	✓	✓	
Biometric vetting*	✓	✓					
	Third parties to be checked, including children aged 10 years and over						
Partner or partners	✓	✓		✓	✓	✓	
Former partners	✓	✓			✓	✓	
All family	✓	✓			✓	✓	
Co-residents	✓	✓		✓	✓	✓	
Notifiable associations	✓	✓		✓	✓	✓	

	Police personnel		Non-police personnel			All	
	RV	MV	NPPV 1	NPPV 2 abbreviated	NPPV 2 full	NPPV 3	Full vetting review
	System checks and assessments on third parties as per above section						
PNC check	✓	✓		✓	✓	✓	
PND check and other force enquiries	✓	✓		✓	✓	✓	
Police intelligence records and other non-conviction databases check	✓	✓		✓	✓	✓	
Counter Terrorism Unit check	✓	✓		✓	✓	✓	

## 6.5.1 Police National Computer (PNC) check

6.5.1.a PNC name enquiries will be conducted on all individuals named on the vetting form, including any alternative names provided.

6.5.1.b PNC name enquiries will provide police data pertaining to:

- arrests
- impending prosecutions
- cautions, convictions, warnings, reprimands and recordable penalty notices
- firearms licence information
- current live orders issued by courts
- overseas convictions which have been notified to the Home Office

6.5.1.c Where there is ambiguity about a record on the PNC, PND checks may provide additional context to support an informed assessment.

6.5.1.d Serving members of the armed forces convicted of any criminal offence by a military tribunal normally have such offences recorded on the PNC.

This includes any aspect of a conditional discharge. Further information may be found on the PND.

## 6.5.2 Police National Database (PND) check and other force enquiries

- 6.5.2.a Forces will use the PND to carry out national intelligence checks on all individuals named on the vetting form. Searches should be conducted on names, dates of birth and current addresses for all those named. Searches should be conducted on previous addresses of the vetting applicant and their current partner or partners. All searches should be initiated with the 'Events' box selected, and all results reviewed. It will be necessary to conduct varied enough searches to reasonably exhaust the possible search results in line with national training standards.
- 6.5.2.b PND will present flagstone records in relation to the barred and advisory lists – see [6.5.11](#). Where there is an indication from a flagstone record that an entry may exist, the [barred and advisory lists](#) held by the College of Policing should be checked. These will confirm whether or not an applicant is currently listed. The [legislation](#) should then be followed accordingly.
- 6.5.2.c PND will present intelligence reports indicating concerning adverse behaviours identified through the police recruitment or vetting process – see [3.3.6](#). The existence of such markers does not itself result in vetting clearance being declined. The processing force should seek to obtain as much information as possible to make informed assessments on a case-by-case basis.
- 6.5.2.d Where a vetting applicant is listed on one of the DBS barred lists, PND will present a marker to prompt further enquiries.
- 6.5.2.e Where PND records do not provide enough information to assess adverse information accurately, force-to-force enquiries should be conducted, with potential for disclosure of case files.
- 6.5.2.f There may be times when the PND is not available for vetting purposes and the applicant has resided outside the force area they are being vetted

to work in. Vetting units should contact the force area where the vetting applicant has resided at any time in the last five years. The PND Data Upload Status document is available on the bulletin board on PND and in the 'Police National Database (PND)' Group on Knowledge Hub (login required). The [College barred and advisory lists](#) should also be checked.

### 6.5.3 Police intelligence records and other non-conviction database checks

- 6.5.3.a Multiple data systems are used across policing to accommodate different operational needs. These can provide information to support vetting decision making. National systems are used, such as the [penalty notice processing system](#) (PentiP). Local systems are also used for activities such as call handling, local intelligence, local crime, custody, recruitment, vetting and personnel records. These include records of probationary constables whose service was discharged as a result of [Regulation 13 of the Police Regulations 2003](#).
- 6.5.3.b While the PND provides national police intelligence, local systems may provide further details relevant to local threats and risks. Local police intelligence records should be checked against all named individuals and their addresses provided on the vetting form submission. This includes those identified during the vetting process who are linked to the applicant and may be involved in criminality.
- 6.5.3.c Relevant and proportionate checks should be made on non-conviction databases for the vetting applicant and associated individuals, where information could support vetting decision making. Due to the variety of local systems nationally, it is not possible to provide definitive direction. FVUs should undertake their own assessments, knowing the information available to them locally.
- 6.5.3.d Any police intelligence about the vetting applicant, family members and home addresses revealed by these checks will be classified using an [intelligence report](#). The grading of the intelligence should be considered as part of the risk assessment.

## 6.5.4 Electoral register and co-residents check

- 6.5.4.a Forces should check details of the vetting applicant's address against the electoral register. Vetting applicants who are not shown on the register should have their previous address checked. If the vetting applicant still cannot be found on the register, they should be contacted for more information and forces should consider additional identity checks.
- 6.5.4.b The electoral register can be checked through a credit reference check.
- 6.5.4.c It should be noted that the electoral register is published periodically, so it may not provide up-to-date information.
- 6.5.4.d Co-resident details may be verified through the electoral register checks. Where additional individuals are shown but have not been declared, further enquiries with the vetting applicant should be made to clarify the situation.
- 6.5.4.e A house in multiple occupation (HMO) is where at least three tenants live in a house but they form more than one household. HMOs can be set up in a number of ways. However, tenants often share amenities such as kitchens and bathrooms, and have their own personal space that is securely locked.
- 6.5.4.f HMOs are increasingly common living situations, however this can create a challenge when assessing risks during vetting. Typically, if the applicant keeps their door locked at all times and only interacts with other occupants within the shared spaces, it is unlikely those other occupants would need vetting. Exceptions are if there is adverse information relating to the address, or if the applicant has raised an issue in the application form.
- 6.5.4.g If the applicant has provided other occupants' details, these should be checked. However, it may not be possible or appropriate to request details of occupants with whom they have little interaction, without disclosing why these are required. Each applicant from an HMO should be assessed on a case-by-case basis.

## 6.5.5 Counter Terrorism Unit checks

6.5.5.a Counter Terrorism Unit enquiries must be made against the vetting applicant, partner, family, associates and co-residents. These checks relate to domestic extremism and counter terrorist information where required.

## 6.5.6 Credit reference checks

6.5.6.a Credit reference checks provide an overview of the vetting applicant's current financial position. This includes details of:

- current and credit accounts held
- electoral roll information
- bankruptcy
- county court judgements (CCJs)
- defaulted accounts
- arrangements
- 12 months' payment history
- recent credit applications
- other financial data

6.5.6.b Credit reference checks must be carried out where required to assess the vetting applicant's financial position:

- at the point of initial application
- as they apply to a post requiring MV clearance
- as part of a full vetting review
- on renewal of clearance
- as part of financial risk management activities
- when further information is received about debt issues
- for a financially related change of circumstances

## 6.5.7 Open source enquiries

- 6.5.7.a **Open source enquiries** include reviewing any identifiable information about the vetting applicant that is available publicly online, including social media sites.
- 6.5.7.b Open source enquiries assist with risk identification, particularly those that would indicate a vetting applicant is unsuitable to work in policing. It additionally can protect the vetting applicant's personal details and highlight potential vulnerabilities, such as poor security awareness or inappropriate self-representation.
- 6.5.7.c Open source enquiries should be carried out from the viewpoint of a member of the public or other interested external party. This will assist with identifying any potential risk to the vetting applicant, the public or the police service.
- 6.5.7.d A proportionate approach should be taken to conducting enquiries. Forces need not spend excessive time on research. If the vetting applicant cannot be found in a reasonable time period, a 'no trace' conclusion can be drawn.
- 6.5.7.e Open source enquiries for police vetting should be conducted in accordance with local procedures.
- 6.5.7.f Open source enquiries should be completed for RV and MV applications and NPPV level 2 full and NPPV level 3 applications for agency personnel fulfilling establishment roles. Open source enquiries for other NPPV level 2 full and NPPV level 3 applications should be considered where the FVM determines there is a risk that needs mitigating. This may be either due to the role the applicant will perform, or because other vetting research has revealed adverse information.

## 6.5.8 Professional standards department (PSD) and counter corruption unit (CCU) checks

- 6.5.8.a A vetting applicant may have served previously as a police officer, police staff or special constable. In such cases, professional standards

complaints, misconduct and intelligence records should be requested from the relevant PSD(s) to assess any potential risk.

- 6.5.8.b Following such requests, the parent force's PSD must ensure that a full complaint and misconduct history is provided as a summary print. The PSD should ensure that the complaint and misconduct history has been weeded, in accordance with national retention guidelines before sharing with the receiving force.
- 6.5.8.c The complaint and misconduct history should be recorded on the PSD complaint and misconduct database of the force they are transferring to. It should be attached to their nominal staff record. This ensures that the history is available for the purpose of a severity assessment as part of any future complaint or conduct matter.
- 6.5.8.d A request should also be made with the appropriate CCU to provide any intelligence or information which may be relevant to the vetting process.  
**See Appendix F.**

## 6.5.9 Ministry of Defence (MoD) checks

- 6.5.9.a Military or MoD checks should be carried out where the vetting applicant is, or has previously served or been employed or a reserve in HM Armed Forces.

## 6.5.10 ACRO Criminal Records Office (ACRO) checks

- 6.5.10.a Where the vetting applicant is a foreign national or has a history in another country, a request should be made through ACRO. ACRO may be able to facilitate a foreign national conviction check with the home nation. This is not required in cases where the vetting applicant was aged under 10 for the period when they were overseas.
- 6.5.10.b Not all countries support requests for recruitment purposes. Where responses can be obtained, they can often be delayed excessively. In such cases, the ACRO request should still be submitted and consideration to grant a partial or conditional clearance should be made. It is an official-sensitive service only available to relevant practitioners.

Further guidance can be accessed through the [ACRO International Conviction Check group](#) on the Knowledge Hub (login required).

### 6.5.11 Barred and advisory list check

- 6.5.11.a Force PSDs must inform the College of Policing following the dismissal of a member of police personnel. This is also the case where an individual resigns or retires subject to a continuing gross misconduct investigation. This is a requirement of the [Police Barred List and Police Advisory List Regulations 2017](#).
- 6.5.11.b In these cases, a flagstone record must be created on intelligence systems to provide a notification during police vetting processes. This flagstone record will be identified through a [PND check](#).
- 6.5.11.c Barred and advisory list checks are conducted initially through a PND check. Where a flagstone record or intelligence marker indicates that an entry exists, details should be verified against the [police barred and police advisory lists](#). FVUs have access to the lists through the barred and advisory case management system, which is managed and maintained by the College of Policing. Further information about the flagstone report or entry on the barred or advisory list should be requested from the originating force.
- 6.5.11.d Forces should regularly audit entries on the police barred and police advisory lists against those records they are responsible for on the PND and Centurion. This also applies to records held on other centralised PSD recording systems.
- 6.5.11.e The [Police Barred List and Police Advisory List Regulations 2017](#) bars a force or relevant body from appointing or employing a barred person who is on the barred list. It requires them to consider the circumstances around any entry on the advisory list.
- 6.5.11.f Flagstone records may no longer be required, for example, after a Police Appeals Tribunal decision reinstating an individual, or if an investigation into a former officer or staff member is discontinued. These should be

deleted in accordance with the [PND Guidance for Submission of Flagstone Records](#).

6.5.11.g Those on the barred list can request a review after the period specified in the [Police Barred List and Police Advisory List Regulations 2017](#).

The College of Policing manages and maintains the barred list and [guidance on the Barred List review process for professional standards departments](#).

## 6.5.12 Consideration of financial position

6.5.12.a Credit checks are used to assess whether vetting applicants:

- have been, are currently or are likely to be in financial difficulty
- show signs of financial irresponsibility to the extent that they could become vulnerable to financial inducement

6.5.12.b The information provided in the vetting application form should be compared with the results of a credit reference check.

6.5.12.c There may be some debt that is not included in the credit reference check. Additionally, recent payments may not appear when the check is carried out. Consideration should be given to the fact the report may not reflect the vetting applicant's true financial position.

6.5.12.d Certain financial situations may allow a level of police vetting to be granted with conditions that support ongoing risk management – see [Appendix N, section 4](#). Other circumstances associated with high financial vulnerability will make granting police vetting clearance unlikely, for example, where a vetting applicant has:

- an outstanding CCJ
- been registered bankrupt and three years have not passed since the date bankruptcy was discharged
- been granted a debt relief order (DRO) and three years have not passed since the date it was finalised

6.5.12.e Vetting officers and individuals' supervisors should be aware that considerable or adverse debt may have a detrimental impact on

wellbeing. Consideration should always be given to the force's unmanageable debt policy as well as referral to welfare provisions, including occupational health where appropriate.

### 6.5.13 Full financial checks

6.5.13.a Full financial checks are required for vetting applicants working in roles with access to sensitive police premises, information, intelligence, financial or operational assets, where:

- the risk of potential compromise of those assets is high
- the risk of serious damage to the force is substantial – see [5.4.2.a](#)

6.5.13.b In addition to [credit reference checks](#) and [a consideration of financial position](#), the vetting application requires additional financial information, including about those sharing financial responsibilities with the vetting applicant.

6.5.13.c Additional financial information must be reviewed to better understand:

- assets and liabilities
- whether financial commitments are proportionate to income
- if any factors are identified relating to potential financial vulnerabilities, such as unexplained affluence

6.5.13.d In-depth financial checks are undertaken during NSV of applicants for SC and DV. Vetting applicants requiring SC or DV should have their financial situation fully reviewed prior to applications being initiated. This will provide a level of reassurance that their financial circumstances will not negatively impact the NSV application.

### 6.5.14 Assessment of risk to vulnerable individuals

6.5.14.a A person is vulnerable if, as a result of their situation or circumstances, they are unable to take care of or protect themselves or others from harm or exploitation. For more information, see the College of Policing's [introduction to vulnerability-related risk](#).

- 6.5.14.b Anyone can become vulnerable at any time, including individuals who have been personally affected following a crime. This includes those who have experienced hate crime or the misogynistic behaviours and offences included in the College of Policing's [violence against women and girls toolkit](#). This list may be used to support forces in identifying vulnerability. However, it does not provide every possible offence and should be considered in addition to more serious types of incidents when considering vulnerability.
- 6.5.14.c All vetting decisions must consider anything in the applicant's available history indicating they may pose a risk to those who are, or may become, vulnerable. This is irrespective of whether the applicant will be working closely with vulnerable individuals – [see 5.5.4](#). Decisions should account for the need to protect both the public and those working within policing.

## 6.5.15 Annual integrity and vetting review

- 6.5.15.a The annual integrity and vetting review process is an integral part of the wider protective security regime. It must be conducted on an annual basis between police personnel and their supervisors. This allows police personnel to maintain their police vetting clearance. Supervisors should inform the FVU of any information identified that may affect a vetting clearance.
- 6.5.15.b Forces must have a robust system in place to record engagement and completion by police personnel and their supervisors – see [3.2.2.a](#). The annual integrity and vetting review template at [Appendix B](#) supports forces in developing their local policy details, links and contacts.
- 6.5.15.c The purpose of the annual integrity and vetting review is to identify risks by ensuring police personnel are aware of the policies that support their integrity and that of the police service. It regularly reminds them of their responsibility to report relevant changes to the vetting unit at the earliest opportunity for a [focused vetting review](#). Also see [3.8 – Expectations of police personnel, agency personnel and volunteers](#).

- 6.5.15.d Vetting clearance can be withdrawn if police personnel do not engage with the annual integrity and vetting review process without reasonable justification. See [3.8.8](#).
- 6.5.15.e The annual integrity and vetting review may remind police personnel of a change of circumstances that has not yet been declared – see [3.8.4](#). They should take immediate action to make a suitable disclosure, following the local process. A [focused vetting review](#) will take place at the earliest opportunity following a disclosure if required.
- 6.5.15.f Chief constables do not have a supervisory line manager. They are, however, expected to undertake an annual integrity and vetting review. This should be conducted by their local policing body (LPB) under their responsibility for chief constable vetting – see [7.8.2](#).
- 6.5.15.g Agency personnel holding NPPV clearance while fulfilling police establishment roles must participate in the annual integrity and vetting review process to maintain their vetting clearance – see [3.8.8](#).
- 6.5.15.h NPPV level 3 police vetting clearance holders who do not meet the criteria in [6.5.15.g](#) must be sent the NPPV level 3 annual vetting notice. They must read, acknowledge, sign and return this to the FVU each year to maintain their clearance. If not returned, it will be assumed the clearance holder no longer requires police vetting clearance and this will be withdrawn. See [3.9.2](#), [5.4.2.g](#) and [9.14.6](#).

## 6.5.16 Business interests and additional employment considerations

- 6.5.16.a Forces must have a local policy for business interests and additional employment. [Regulation 7 of the Police Regulations 2003 \(as amended by the Police \(Amendment No. 3\) Regulations 2012\)](#) provides the legislative basis of business interests for police officers.
- 6.5.16.b Where the vetting applicant to be employed by the force has:

- provided details of any business interest or additional employment that they plan to continue, not related to their primary duties with the police service, or
- declared that they, their partner or any co-resident own or run a shop or business which requires a licence or permit granted in pursuance of the law. This relates to liquor licensing, refreshment houses or betting and gaming or regulated places of entertainment

the information should be passed to the local policy owner and the vetting applicant should be advised they are required to submit an application in accordance with local policy.

- 6.5.16.c Information provided by NPPV applicants should be considered by the FVU. If needed they should seek guidance from the sponsor and relevant departments about any concerns or conflicts of interest.
- 6.5.16.d A declined business interest application in itself will not affect a police vetting decision. In such cases, the vetting applicant needs to consider whether they wish to progress their application to the police force or withdraw from the process.
- 6.5.16.e Any concerns about business interests or additional employment should be considered as part of the vetting assessment.

## 6.5.17 Liaison with occupational health

- 6.5.17.a Forces should take great care when considering vetting information relating to mental or physical health, especially if this indicates a vulnerability that could result in the vetting applicant being unsuitable for appointment by the force.
- 6.5.17.b Neither police officers nor FVMs are qualified to assess medical conditions, including mental health. Any medical information revealed as part of the vetting process, such as intelligence reports or allegations, which could impact suitability for vetting clearance or role, must be passed to the force medical officer (FMO) or OHU for a full professional assessment. Remaining vetting enquiries should be completed and the vetting file should be finalised as far as possible.

- 6.5.17.c If after assessment the FMO or OHU believes the vetting applicant is medically fit, a discussion should take place with the FVM to consider suitability for vetting clearance. However, no personal medical information should be passed to FVUs without consent of the applicant.
- 6.5.17.d If it is identified that expected medical information has not been declared, the matter should be referred back to the FVU as a potential integrity concern.

## 6.5.18 Supervisor appraisal

- 6.5.18.a A supervisor appraisal should be sought for all police personnel vetting applicants when they move into a role that requires MV clearance, a role working closely with vulnerable individuals or request transfer to another force. This applies regardless of which force they are currently serving with, their current role or vetting clearance level.
- 6.5.18.b The supervisor appraisal supports the wider protective security regime. It does so by minimising risk and protecting the public, police personnel and police assets, where such roles present a higher risk – see [3.7.3](#).
- 6.5.18.c If the current supervisor cannot provide a sufficient appraisal due to a short supervisory period or low level of contact, they should still complete the requested supervisor appraisal. They should also nominate an additional supervisor to provide a more comprehensive and accurate assessment.
- 6.5.18.d For individuals currently working outside of the police service, supervisor appraisals will not be requested. Employment references will be obtained during recruitment onboarding. Where external employment references highlight potential areas of concern relating to the protective security regime, these should be referred to the FVU for assessment.
- 6.5.18.e The FVM can request an exploratory vetting interview with the supervisor if insufficient information is provided to make an effective vetting assessment.
- 6.5.18.f For further information, see [Appendix D](#).

## 6.5.19 Crime report allegations

- 6.5.19.a The **Rehabilitation of Offenders Act 1974** (ROA) does not apply to criminal allegations which did not lead to a caution or conviction. These allegations identified through the PNC, PND or local crime system check can be considered as part of the vetting assessment. In such cases, a vetting assessment should not be made simply on the recorded outcome. The details of the investigation should be reviewed to understand the full circumstances of the allegation. This includes outcomes that have been finalised as 'no further action' or 'eliminated'.
- 6.5.19.b Where there is a formal outcome such as conviction, caution or other recordable disposal, the vetting process will assess the allegation and outcome. The allegation will not be reinvestigated, and the proportionality of the disposal will not be reassessed.
- 6.5.19.c Crime report allegations relating to third parties should be considered when assessing the vetting applicant's suitability for clearance.

## 6.5.20 Biometric vetting checks

- 6.5.20.a Police officers, special constables and some staff roles, such as police community support officers (PCSOs) or forensic roles require **biometric vetting**. For the purpose of police vetting, speculative searches of biometric data – fingerprints and DNA – are checked against local and national databases to determine whether:
- the vetting applicant has come to police attention
  - any identified police attention was under the identity declared in the vetting application and not, for example, under an unknown alias
  - the vetting applicant is linked to any outstanding crime scene marks or stains
- 6.5.20.b Where the searches are negative, the appointment of the vetting applicant can progress normally.
- 6.5.20.c Where the searches are positive, the FVM must be notified for appropriate action to be taken. The vetting decision for the vetting applicant will be

delayed until any issues raised following the positive result have been satisfactorily resolved. The ultimate vetting decision is made by the FVM with delegated authority from the chief officer.

- 6.5.20.d Where a positive biometric result relates to police personnel (such as a member of police staff applying to become a regular police officer or a special constable), a referral must be made to the relevant PSD for appropriate action.
- 6.5.20.e Biometric vetting is not applied to officers who are transferring between forces or returning from a period of absence.
- 6.5.20.f Also, see [3.3.5 - biometric vetting](#) for expectations of police forces.

## 7. Maintaining vetting clearance

### 7.1 Vetting reviews

- 7.1.1 Maintaining vetting clearance is a continual process. Vetting applicants include those currently holding clearance, who are 'applying' to maintain their clearance following reporting of relevant information or change of circumstances. Vetting reviews completed by FVUs consider whether a vetting clearance can be maintained.
- 7.1.2 As a vetting applicant or vetting holder's circumstances can change at any time, it is important to have a comprehensive vetting review regime. This allows ongoing assessment and ensures that clearance can be maintained. These vetting reviews, alongside annual integrity and vetting reviews, are therefore an important part of any vetting process. They are the responsibility of the vetting applicant or vetting clearance holder, and the FVU, with support from the force, supervisors and sponsors.
- 7.1.3 FVMs may initiate a vetting review for RV, MV or NPPV clearances at any point if:
- adverse information comes to light relating to the vetting applicant
  - there is a material change in the vetting applicant's personal circumstances
  - for any other reason the FVM determines it necessary, reasonable and proportionate
- 7.1.4 All vetting reviews should be recorded on the applicant's vetting file. Records should include the information that triggered the review, outcomes of checks and enquiries and the closure or decision rationale.
- 7.1.5 If adverse information is declared or discovered during a vetting review process that is likely to result in misconduct proceedings, the FVM should notify the PSD immediately. The vetting review process may also identify risk management actions required to maintain vetting clearance. If the adverse information relates to NSV, the force should take appropriate measures as outlined in the [security policy framework \(SPF\)](#). Where

adverse information may reasonably lead to vetting clearance being withdrawn, a withdrawal assessment procedure should commence – see [9.13](#).

## 7.2 Types of vetting review

7.2.1 In addition to the [annual integrity and vetting review](#), there are two other types of vetting review:

- [full vetting review](#)
- [focused vetting review](#)

### 7.2.2 Full vetting review

7.2.2.a Full vetting reviews must take place in line with specific criteria or trigger points. They should only be used if the level of vetting clearance for the new role is comparable to, or lower than, that already held by the vetting applicant. If the clearance has expired, or is nearing expiration, a full vetting review should not be completed and a renewal of vetting clearance should be triggered. See [renewing police vetting clearances](#) for more information.

The criteria or trigger points for a full vetting review include the following:

- A change in employment group equating to an equal or reduced level of clearance. Examples include moving from roles of:
  - police officer to police staff – RV to RV
  - special constable to police officer – RV to RV
  - NPPV to police staff – NPPV level 2 full to RV, NPPV level 3 to MV
  - police staff to police officer – RV to RV or MV to RV

See [employment group changes](#).

- If the vetting applicant is taking up a secondment where police vetting is required, for example a seconded role to the College of Policing, a supervisor appraisal must be requested as part of the full vetting review.

- Where the vetting applicant returns to force following an external secondment of more than 12 months. For further information, see [return following secondment](#).
- Where the vetting applicant is returning from an extended period of absence external to the force. For further information, see [extended absence](#).
- Where the vetting applicant is moving internally to a new [role working closely with vulnerable individuals](#). This applies even if the vetting applicant is currently in a role working closely with vulnerable individuals. A supervisor appraisal must be requested as part of the full vetting review.
- Where the vetting applicant holds MV clearance and is moving internally to a new role that also requires MV clearance. A supervisor appraisal must be requested as part of the full vetting review.
- Where the vetting applicant has been declined police vetting clearance by another force through a transfer application. For further information, see [transferees](#).
- Where the vetting applicant is returning to employment or appointment following a successful appeal against dismissal by the Police Appeals Tribunal. For further information, see [return following dismissal](#).
- In all of the above circumstances, a full vetting review is required if more than 12 months have passed since clearance was granted or a full vetting review was completed.
- A full vetting review is not required if less than 12 months have passed since clearance was granted or a full vetting review was completed. However, if adverse information of current concern has previously been identified, a focused vetting review should be completed to ensure continued management of any risk.

7.2.2.b Where the vetting applicant is transferring to another force that shares the same FVU, and has been granted the required level of vetting clearance in the last 12 months, the option to complete either a full vetting review or a new vetting application is at the discretion of the FVM – see [7.5.1.f](#).

7.2.2.c Full vetting reviews can be initiated at any point for any level of vetting, at the discretion of the FVM, to support local risk assessment and management initiatives.

7.2.2.d As a minimum, a full vetting review should include the following checks on the applicant:

- PNC
- PND
- professional standards
- counter corruption
- open source
- credit reference
- checks on any new information provided

Full vetting reviews should consider any previously identified risks such as those associated with geographical location concerning the applicant and third parties.

7.2.2.e Full vetting reviews do not equate to a vetting renewal.

### 7.2.3 Focused vetting review

7.2.3.a All vetting applicants subject to the vetting process must report any changes in their personal circumstances to their FVU. This includes those who have submitted a vetting application and are awaiting a decision, and those who have been granted vetting clearance. Examples of changes requiring disclosure can be found at [3.8.4](#). This list is not exhaustive. If the FVU is made aware of any adverse information, a focused vetting review should be completed.

7.2.3.b On receipt of a change of circumstances or adverse information disclosure, the FVU must undertake a focused vetting review. They should assess all new information provided and conduct any related checks and enquiries required for the specific vetting level. These reviews do not require a full vetting review or new vetting application form, unless there are significant changes justifying a more in-depth review.

- 7.2.3.c Focused vetting reviews should be conducted within a reasonable timeframe to ensure risks are identified and assessed as soon as possible. A change of circumstances should be brought to the attention of the FVU at the earliest opportunity. However, forces may notice more disclosures if the annual integrity and vetting review processes are aligned with force-wide performance development reviews or other fixed times. Advanced vetting resource planning should anticipate such peaks to ensure they can meet demand. This includes the force producing periodic internal awareness campaigns to ensure timely reporting throughout the year.
- 7.2.3.d Where vetting clearance is granted with conditions, or partially approved with low-risk outstanding checks, focused vetting reviews may be part of the [risk mitigation strategy](#). This may include:
- Scheduled focused vetting reviews to check the progress of a particular factor. Examples include outstanding checks being returned, improvement in financial circumstances or monitoring the progression of an investigation.
  - Setting reporting requirements in place with the vetting applicant. For example, requiring them to advise when they have contact with a notifiable association, or updating the FVU of the progression renewing their work visa.
  - Any other ongoing risk management activities that reassess the vetting applicant's suitability to hold vetting clearance.
- 7.2.3.e If a vetting applicant has been subject to [focused vetting reviews](#) but does not engage with resulting risk management activities, they are not sufficiently maintaining their clearance and it can be withdrawn.

## 7.3 Reviewing vetting clearance following misconduct

- 7.3.1 As a minimum, a [focused vetting review](#) of a police personnel's current clearance must be conducted following the conclusion of misconduct proceedings which resulted in any sanction other than dismissal. The

focused vetting review must consider the vetting applicant's suitability to maintain their current police vetting clearance and continue in their post. The focused vetting review does not restrict the FVM from requiring a full vetting review or the submission of a new vetting application form where it is considered appropriate. Where the FVM determines it justifiable, necessary and proportionate, a review of vetting clearance can be conducted even when no sanction is given.

- 7.3.2 Vetting clearance is required for all police personnel roles. As a result of the vetting review, where MV clearance is held, it can be downgraded. In such cases, the force must make every reasonable effort to find an alternative suitable role that requires RV clearance. If an alternative suitable role is not available, or the individual is no longer suitable to hold RV clearance, they will be subject to dismissal. See [9.13](#), [8.6.4.a](#) and [9.7](#).
- 7.3.3 Misconduct proceedings and a subsequent review of vetting clearance are different processes that, although closely related, are distinct.
- 7.3.4 Conduct regulations, or police staff disciplinary policy, must take primacy and a vetting review is not in lieu of misconduct proceedings or a route to subvert the protections afforded through misconduct proceedings.
- 7.3.5 When a misconduct investigation or proceedings have been initiated, or are ongoing, any risk posed by police personnel can be effectively managed through restrictions or suspension, so there is no requirement to review vetting during this period. A review of vetting following misconduct must commence following the conclusion of misconduct proceedings which resulted in any sanction other than dismissal. A misconduct allegation may have no case to answer following a misconduct investigation or proceeding. If appropriate, any adverse information highlighted in such cases can be assessed through a focused vetting review.
- 7.3.6 The vetting review should consider the conduct that resulted in the initiation of misconduct proceedings. However, this is in the wider context of the individual's suitability to hold a vetting clearance against the factors outlined in this APP. This is a holistic assessment of all information

known, including that considered in prior vetting assessments. All vetting decision rationales should be full, detailed, well-reasoned and proportionate. See [decision-making and transparency](#) and [the vetting decision](#).

7.3.7 A vetting review following misconduct may lead to a withdrawal assessment, which can result in the following vetting clearance outcomes:

- clearance granted
- clearance granted with conditions
- clearance downgraded with or without conditions – MV to RV
- clearance withdrawn

## 7.4 Triggers for a full vetting review

### 7.4.1 Internal moves

7.4.1.a Police personnel moving laterally or on promotion within a force do not need to submit a new vetting application form or be subjected to a full vetting review, if:

- they are moving to a post that does not require MV clearance
- their new role will not be [working closely with vulnerable individuals](#)
- their current clearance is valid and maintained

The annual integrity and vetting review process, and proactive reporting of change of circumstances or adverse information, provide risk mitigation to assure an individual's continuing vetting clearance. However, if the FVM determines it to be justifiable, necessary and proportionate, a vetting review can be completed for any internal move.

7.4.1.b The FVM should liaise with HR to ensure when moves are agreed there is a process in place to consider any vetting requirements. Any vetting processes required should be completed prior to the move taking place.

## 7.4.2 Employment group changes

7.4.2.a A full vetting review is required for individuals with continual service in the same force who are changing employment group – see [7.2.2.a](#) – when:

- the same or equivalent level of vetting clearance is required
- their current clearance is valid and maintained

Continual service includes circumstances where there is a requirement to have a short break in service between the transition. The review must be completed before starting their new role or contract. Where clearance has expired or not been appropriately maintained, a new vetting application form must be submitted. In cases of changes in employment group, the HR process should include an employment reference from the current supervisor to identify any potential barriers to employment in a different role. In all cases, the FVM has discretion to request that a new vetting application form is completed.

7.4.2.b Where a higher level of vetting clearance is required, the vetting applicant is required to submit a new full application form for the required level.

## 7.4.3 Extended absence

7.4.3.a Forces can require a new vetting application form from police personnel returning following an extended period of absence from their parent force. A new vetting application form must be completed if the current vetting clearance has not been maintained or is no longer valid.

7.4.3.b Extended absence from the parent force includes circumstances such as:

- vetting applicants who have been on an external secondment for more than 12 months
- vetting applicants who have been on any other period of absence for more than 12 months
- vetting applicants who have been on an agreed career break for 12 months or less – see [career break returners](#)

7.4.3.c These requirements do not apply to those returning from:

- maternity or paternity leave

- adoption leave
- shared parental leave
- compassionate leave
- long-term sick leave

However, police personnel are still contractually expected to notify vetting of any change of circumstances within this period.

## 7.4.4 Commencing a secondment

7.4.4.a Before starting a secondment, police personnel must have a full vetting review and supervisor appraisal. This review should be completed by the parent force. A recommendation for suitability, along with any relevant information, should be provided to the secondee force or agency. The secondee force or agency should then decide whether to accept the secondment.

## 7.4.5 Return following secondment

7.4.5.a Police personnel returning to their parent force, following an external secondment lasting more than 12 months, must be vetted to the appropriate level for the post they will be returning to.

7.4.5.b If an appropriate and valid level of clearance is already held and has been maintained, a full vetting review should be completed. In all other cases, a new vetting application form should be completed.

7.4.5.c If police personnel return to the force from secondment and vetting checks reveal adverse information covering the secondment period, FVMs must notify the relevant appropriate authority. The appropriate authority will consider whether the vetting applicant has breached the **standards of professional behaviour** or their conditions of service.

## 7.4.6 Return following dismissal

7.4.6.a Vetting clearance will have been withdrawn from a police officer or special constable who has been dismissed and subsequently reinstated by a Police Appeals Tribunal. Their reinstatement must not be delayed

because of this and vetting enquiries should be completed at the earliest opportunity.

- 7.4.6.b Where the vetting clearance held prior to dismissal would not yet have expired, a [full vetting review](#) should be completed. Where the vetting clearance held prior to dismissal has now expired, a new vetting application form should be completed.
- 7.4.6.c The police officer or special constable must comply and submit the relevant forms at their earliest opportunity. Failure to do so will be referred to the PSD which will consider appropriate action.
- 7.4.6.d If vetting enquiries identify any adverse information covering the dismissal period, or that was not previously known, the PSD must be notified. The PSD must consider whether the vetting applicant has breached the [standards of professional behaviour](#) or their conditions of service, and take appropriate action.
- 7.4.6.e A member of police staff may be dismissed but then reinstated following an internal appeal or employment tribunal. If adverse information is revealed through vetting enquiries which is unrelated to the reason for dismissal, it should be considered whether a breach of the [standards of professional behaviour](#) has occurred. It should also be considered whether there has been any breach of the terms of their employment. Such matters must be assessed by PSD or HR, depending on local force processes.
- 7.4.6.f See [national security vetting appeals procedure](#) for processes relating to adverse information that may affect NSV clearances.

## 7.4.7 Career break returners

- 7.4.7.a Policies and procedures relating to career break and extended periods of absence are the responsibility of force HR departments. A career break is an extended period of leave from work with an intention to resume working on an agreed date. It is open to police officers and some police staff.

- 7.4.7.b Police personnel taking a career break continue to be regarded as serving police officers or employees of the force. They remain subject to the requirements set out in this APP and the following as applicable:
- [Police \(Conduct\) Regulations 2020](#)
  - [Police Staff Council handbook and force conditions of service](#)
  - [Standards of professional behaviour](#)
  - [Code of Ethics](#)
  - [Vetting Code of Practice](#)
- 7.4.7.c Police personnel who have taken a career break for more than 12 months must submit a new vetting application form within a suitable timeframe before they return. The application should include details about the time period of their career break, and information about any time spent abroad. Where the vetting applicant has returned from a career break within 12 months, see [7.4.3.b](#).
- 7.4.7.d Police officers cannot be prevented from returning to duty from a career break while awaiting a vetting decision. It is advisable, therefore, to ensure that the vetting requirements are satisfied before any return to duty.
- 7.4.7.e If vetting enquiries identify adverse information not previously known, indicating that the [standards of professional behaviour](#) or conditions of service may have been breached, the appropriate authority must be notified.

## 7.4.8 Delays in appointment

- 7.4.8.a The recruitment process can be lengthy. Some vetting applicants may not be appointed for some months after vetting checks are conducted and clearance is granted. Vetting applicants are required to let the FVU know of any material changes to their circumstances. Where delays are significant, additional or repeated processes may be required. Recruitment should consider the use of processes such as contact touch points to encourage and facilitate disclosure of change of circumstances. Any information should be passed to the FVU to consider the need for a

vetting review. The FVU should take account of time passed between original vetting processes and the expected date of appointment.

- 7.4.8.b There may be significant delays between the applicant completing the vetting application form and vetting enquiries commencing. It may therefore be necessary to contact the vetting applicant to confirm whether there has been any change of circumstances.
- 7.4.8.c It may be appropriate to repeat enquiries into other individuals named on the vetting form, depending on specific circumstances.
- 7.4.8.d Where police vetting clearance has been granted six months or more before appointment, a new vetting application process must be completed prior to appointment.

## 7.5 Transferees

### 7.5.1 Vetting of police personnel transferring or moving between forces

- 7.5.1.a A new vetting application form leading to a police vetting clearance is required before the transfer is confirmed for:
- police officers and special constables transferring from one police force to another – transferee
  - police staff applicants who currently serve in another force – transferee
  - police officers or police staff transferring to another force and changing employment group, from police officer roles to police staff roles, or vice versa
- 7.5.1.b References to ‘parent force’ relate to the force where the officer or staff member is currently serving or previously served. References to ‘receiving force’ relate to the force that the officer or staff member has applied to. Refer to [Appendix E](#) and section [3.4.5](#).
- 7.5.1.c Where personnel are transferring with valid DV vetting clearance, a new MV vetting process must be undertaken by the receiving force. This

applies even though the DV clearance is transferable through the UKSV.

See [transferring and sharing national security vetting clearances](#).

- 7.5.1.d Forces must ensure there is no reasonable basis to question the integrity of the vetting applicant wishing to transfer into or re-join the force. They should ensure there are no outstanding complaints, matters currently under investigation or performance matters of concern.
- 7.5.1.e A vetting applicant may hold, or have previously been granted, police vetting clearance by one force following an assessment of their identified potential risks. This decision does not set a precedent for the same decision to be made by another police force.
- 7.5.1.f In the case of FVUs that serve multiple forces, an exception can be made for vetting applicants holding valid required clearance, granted in the last 12 months, by the FVU that also serves their previous force. Their clearance can be transferred to the receiving force following a [full vetting review](#), at the FVM's discretion.
- 7.5.1.g The current clearance details should be sent to the receiving force, with the full vetting file upon request – see [information sharing for transferees](#). This should be accompanied by a supervisor appraisal from the most recent supervisor. The full vetting file should include all previous vetting application documents. This includes results of vetting checks and enquiries, vetting applicant correspondence, decision rationales and any other documents or information about the applicant.
- 7.5.1.h The receiving force must request the full complaint and misconduct history and [counter corruption records](#) of the police personnel from the parent force. They must request these from all forces where they have served or are serving.
- 7.5.1.i The parent force's PSD must provide a full complaint and misconduct history and any counter corruption intelligence. This should be shared as a summary print of all matters recorded against the vetting applicant. See [information sharing for transferees](#). The receiving force should carefully consider all information on the summary print and request further information for any cases which may be of concern. The parent force's

PSD is responsible for ensuring that the complaint and misconduct history and intelligence has been weeded before sharing. This should be done in accordance with [national retention guidelines](#).

- 7.5.1.j The complaint and misconduct history should be recorded on the PSD complaint and misconduct database of the receiving force as a nominal record. This history would then be available to the PSD for the severity assessment in any future complaint or conduct matters. Any intelligence should be forwarded to the receiving force's CCU.
- 7.5.1.k If a transferee vetting applicant fails to declare a criminal or other relevant matter that their parent force was unaware of, their application will be declined. The parent force must be informed immediately. This may lead to a misconduct investigation, which could result in dismissal by the parent force.
- 7.5.1.l Where a transferee's vetting clearance is declined by the receiving force, the parent force's FVU must be informed immediately. They must be provided with the full decision rationale and relevant information. See [Appendix F](#).
- 7.5.1.m A [full vetting review](#) should be completed when a parent force is notified that a serving member of police personnel, or non-police personnel that they sponsor, has been declined police vetting clearance by another force. The full vetting file held by the receiving force should be shared with the parent force. The risks identified that led to a decision to decline vetting may already be known and managed locally by the parent force.

## 7.5.2 Transfer or other movement between forces during, or after, professional standards investigations

- 7.5.2.a There may be cases where a vetting applicant is subject to an ongoing complaint or conduct investigation. They should not be allowed to transfer without the permission of the heads of PSD of the parent and receiving force.

- 7.5.2.b A transferee vetting applicant may be subject to a service confidence procedure in their parent force. The receiving force must be made aware of any such procedures and assess suitability for transfer accordingly.
- 7.5.2.c There may be cases where an officer is subject of an active misconduct investigation in their parent force. They will likely be required to return to that force to attend a disciplinary meeting or hearing. In such cases, the parent force should share the result of the meeting or hearing with the receiving force. This may lead to an additional misconduct investigation in the receiving force or review of vetting clearance.
- 7.5.2.d If an officer is required to attend a hearing in their previous force that results in dismissal, they will be placed on the [police barred list](#). They will then be unable to hold the office of constable in any force.

## 7.6 Re-joiners and those with previous police service

- 7.6.1 A re-joiner is a vetting applicant with previous police service under the same employment group they are seeking vetting clearance for. However, they do not have continual service at the point of application.
- 7.6.2 A new vetting application form is required for all re-joiners. An exception is police officers and special constables who are reinstated by the [Police Appeals Tribunal](#) following successful appeal of dismissal. See [return following dismissal](#).
- 7.6.3 Where relevant, biometric vetting should be applied as set out at [3.3.5](#).
- 7.6.4 There are cases when police personnel are required to have a short break in service before intending to return to the same role or employment group. These cases are considered as continual employment, not rejoining, and should be subject to a full vetting review. For example, a member of police staff be required to have a short break in service before entering into a new fixed-term contract.
- 7.6.5 When vetting a re-joiner, the following paragraphs should be considered as part of the vetting process – [7.5.1.d](#), [7.5.1.e](#), [7.5.1.g](#), [7.5.1.h](#), [7.5.1.i](#), [7.5.1.j](#).

## 7.7 Sharing police vetting clearances

- 7.7.1 Clearance for police personnel who are seconded can be shared with the receiving force or agency.
- 7.7.2 The parent force remains the owner of the individual's vetting. They should be notified of any change of circumstances or adverse information to maintain the validity of the granted clearance. The parent force is responsible for managing required vetting reviews.
- 7.7.3 In the case of collaborative or regional units or forces, local policies must clearly state who owns the police and NPPV clearance. They must set out the shared responsibilities between the contractual parties. All chief constables of forces involved must have oversight and agree with the police vetting clearance ownership responsibility arrangements. The vetting file should be shared if requested.
- 7.7.4 A vetting applicant may be posted from their parent force to a regional unit, governed under a Regional Section 22a agreement, for example CTU or ROCU. The posted police personnel falls under the direction and control of the chief constable of the hosting force during the period of their posting. The parent force should share the full vetting file with the hosting force's FVU.
- 7.7.5 See [5.6.5](#) and [5.7](#) for sharing non-police personnel police vetting clearances.
- 7.7.6 For the purpose of mutual aid, forces will accept the parent force's vetting clearance unless a higher level of vetting is absolutely necessary to perform the role required.

## 7.8 Reciprocal vetting

### 7.8.1 Reciprocal vetting for vetting personnel

- 7.8.1.a Reciprocal vetting has been developed for the vetting of personnel working in vetting units. The recommended process for reciprocal vetting is:

- Forces entering into reciprocal vetting must agree the arrangements for conducting necessary checks before vetting begins.
- Where reciprocal arrangements are used, the force conducting enquiries should make a clearance recommendation. However, the clearance decision remains with the FVM or nominated individual of the requesting force.

7.8.1.b This process has been developed for the following reasons:

- Conducting in-house enquiries into colleagues where personal matters are revealed may affect working relationships within the force.
- Conducting in-house enquiries into colleagues may render individuals vulnerable to allegations of corruption. This is because of the associations and close working relationships that might develop within a small team.
- Where issues are raised by the vetting process, reciprocal vetting ensures that objective, impartial and transparent decisions are made.

## 7.8.2 Reciprocal vetting for chief constables

7.8.2.a This is where an FVM from another force manages and coordinates vetting enquiries.

7.8.2.b Where reciprocal arrangements are used, the force conducting the enquiries should make a clearance recommendation. The clearance decision, however, remains with the monitoring officer or the chief executive of the ELPB for the force to which the clearance relates, with advice from the FVM. The complete vetting file should be returned to the requesting force for the clearance decision to be made.

## 7.9 Transfer of Undertakings (Protection of Employment) Regulations

7.9.1 Individuals employed by an external agency or another force may be employed by a new force through [Transfer of Undertakings \(Protection of Employment\) Regulations \(TUPE\)](#). Vetting to the appropriate level must be considered in these circumstances.

7.9.2 For police staff transferring between forces, the guidance at [7.5](#) for transferees and those with previous police service should be followed.

7.9.3 Where it is evident that vetting clearance will not be granted, full consultation must be undertaken with the relevant HR departments at the earliest opportunity. The following options should be explored:

- the potential for the vetting applicant to remain with the current employer
- progressing the transfer, which would ultimately lead to dismissal as they would be unable to perform their role

## 7.10 Renewing police vetting clearances

7.10.1 Clearances are valid for limited periods and require renewal on expiry. The table below summarises the periods at which different police vetting clearances should be renewed.

Clearance level	Renewal period
<b>RV</b>	10 years
<b>MV</b>	7 years
<b>NPPV 1</b>	3 years
<b>NPPV 2 abbreviated</b>	3 years
<b>NPPV 2 full</b>	3 years
<b>NPPV 3</b>	7 years

7.10.2 A renewal of vetting clearance requires a new vetting application form to be completed. All required checks relevant to that level of vetting must be completed. The validation period restarts following a vetting clearance renewal.

7.10.3 While vetting clearances are granted for the time periods above, maintaining vetting clearance is a continual process. Serving police personnel are required to participate in annual integrity and vetting reviews. The FVU should also be notified of any change of circumstances at the earliest opportunity. In addition, both full and focused vetting reviews will take place as required over the period of the clearance.

These processes maintain the validity of police vetting clearance for the full validation period – see [3.8.4](#) and [8.8.4](#).

- 7.10.4 Forces may initiate a vetting renewal for RV, MV or NPPV clearances at any point. This may occur if adverse information comes to light relating to the vetting applicant, or if there is a material change in the vetting applicant's personal circumstances. It can also take place for any other reason the FVM determines is necessary, reasonable and proportionate.
- 7.10.5 To provide assurance of applicants' continued suitability to hold vetting clearance, forces should conduct randomised early vetting renewals. These should be conducted on a sample of their workforce, where a clearance has not been subject to a full vetting review in the preceding three years.
- 7.10.6 A force may grant clearances with the condition of a reduced validation period as part of the risk management plan. For example, a member of staff may have a visa allowing them to work in the UK, but with an expiry date in two years' time. A risk management plan would see police vetting clearance only being granted to the date of their visa expiry date. Vetting clearance would then require renewal.
- 7.10.7 In exceptional cases, the FVM can consider a short extension to expired clearances on a case-by-case basis. In most cases, a new vetting application form must be received by the vetting unit from the vetting applicant to support management of risk. Such cases must have a full audit trail detailing the circumstances, reasons, risk mitigations and risk management plan. These should be easily identifiable on the local vetting system.
- 7.10.8 The renewal periods for NSV clearance levels can be found under [renewing NSV clearances](#).

## 8. Decision-making and transparency

8.1 This section is aimed at the people in the FVU making vetting decisions.

8.2 Vetting decisions should be made in accordance with:

- the [College of Policing's NDM](#)
- the [Vetting Code of Practice](#), this APP and [The Police \(Vetting\) Regulations 2025](#)

and considering:

- the [standards of professional behaviour](#)
- the [Code of Ethics](#)

8.3 The vetting decision record form at [Appendix K](#) references the sections and paragraphs of this APP that are relevant to decision making.

### 8.4 Gathering information and intelligence

8.4.1 This first stage in applying the NDM is to undertake the standard checks required for the vetting level application. This is to understand what is known so far, identify gaps in required information and what further information is needed, if any. All vetting enquiries should be completed with professional rigour and curiosity.

8.4.2 Principal sources of information in the vetting process include:

- vetting form submission from the vetting applicant
- verified identity and residency documentation
- previous police vetting files
- police information systems and case files
- credit reference databases
- open source
- people intelligence meetings

8.4.3 The information and intelligence to be gathered is specific to each vetting level and individual case. For further information, see [standard checks](#)

**and assessments** to fulfil the requirements related to the relevant vetting clearance level.

8.4.4 Vetting clearance should not be granted until all relevant vetting enquiries have been completed. Forces can decline clearance as soon as they have gathered sufficient evidence to justify that decision. If an appeal is made against the decision, the force should complete any outstanding vetting enquiries before considering the appeal. This ensures that all relevant information is taken into account. However, where it is evident from the outset that completing the outstanding enquiries will not add value to the appeal, these do not need to be completed.

8.4.5 In accordance with the required standard in **maintaining records**, the results of vetting enquiries should be recorded on the vetting applicant's vetting file, with any information they provide. This information can be collated on a vetting record decision form – see **Appendix K**.

## 8.5 Assessing threat and risk and developing a working strategy

8.5.1 This is a stage that involves assessing the situation so far, including any specific threat or risk of harm.

### 8.5.2 Assessing threats and risks

8.5.2.a Risk is determined by the consideration of three primary factors:

- threat
- vulnerability
- impact

8.5.2.b Acknowledged current threats across the police service include:

- public protection
- police corruption
- sexual misconduct
- infiltration
- organised crime

- financial vulnerability
- criminal or other inappropriate association
- substance misuse
- unauthorised disclosure of police information
- coercion
- abuse of position, including abuse of position for a sexual purpose (APSP)
- discriminatory behaviour
- theft of police assets or evidence
- misuse of social media

This list is not exhaustive.

8.5.2.c FVMs should ensure they are familiar with their local strategic threat assessment.

8.5.2.d Where potential threats are identified, there will be associated vulnerabilities. The level of vulnerability is case-specific and depends on the vetting applicant's circumstances. In assessing risk and vulnerability, forces should consider all possible threats, and their likelihood and impact.

### 8.5.3 Factors requiring particular scrutiny

8.5.3.a Each case needs to be considered on its own merits, bearing in mind the role, public contact and assets to be accessed. A case should receive particular scrutiny if any of the following factors are present:

- Adverse recruitment intelligence through previous police service recruitment processes.
- Previous decline or withdrawal of police vetting clearance.
- Providing false or deliberately misleading information or omitting significant information from the vetting application form.
- Failure to disclose a change of circumstances.

- Association with people who have previous convictions or who are reasonably suspected of being involved in crime, which could not be managed by any risk mitigation and notifiable association policy, or where these are not being complied with.
- Financial vulnerability.
- Improper or inappropriate online activities.
- Dismissal from a previous role for conduct concerns.
- Probationary constables discharged from the police service under **Regulation 13 of the Police Regulations 2003**.
- Evidence of violence, intimidation, harassment, discrimination, racism, homophobia or disablism.
- Evidence of violence against woman and girls (VAWG).
- Evidence of sexual impropriety, sexism, misogyny, domestic abuse, stalking, harassment, or controlling or coercive behaviour.
- Abuse of position, including APSP.
- Evidence of unsatisfactory professional behaviour not in keeping with the behavioural expectations and principles of the **Code of Ethics**.
- Adverse counter corruption intelligence.
- Significant adverse complaint or conduct history.
- Significant or repeated performance matters.
- Previous breaches of the **standards of professional behaviour**.
- Past infringement of security or vetting policy or procedures.
- Drug and alcohol misuse.
- Identified conflict of interest.
- Patterns of adverse behaviours.
- Other inappropriate behaviour that impinges on a person's suitability to serve in the role.
- Other identified areas of concern, such as an individual's character, maturity and integrity.

This list is not hierarchical or exhaustive.

8.5.3.b The presence of one or a combination of these factors can lead to vetting being declined or withdrawn. Where any of these factors are present, but clearance is being granted, the full rationale must be recorded. The decision must be approved by the FVM or nominated individual.

8.5.3.c In assessing threat and risk, the **assessment of risk to vulnerable individuals** should always be considered for all police vetting levels.

## 8.5.4 Assessing circumstances that may impair judgement or result in vulnerability to pressure or inducements and trustworthiness

### 8.5.4.a Circumstances that may impair judgement or result in vulnerability to pressure or inducements

8.5.4.b The following factors can impair a vetting applicant's judgement, which may lead to them being vulnerable to pressures, inducements or bribes:

- financial difficulties or unmanageable debts
- misuse of alcohol
- compulsive or excessive gambling
- misuse of controlled or prescribed drugs

This list is not exhaustive.

8.5.4.c Assessments should be made on circumstances that present risk factors. Poor judgement or vulnerability to pressure or inducements could affect the confidentiality, integrity or availability of criminal, financial or operational police intelligence assets.

### 8.5.4.d Assessing the criteria for trustworthiness

8.5.4.e Before forces grant clearances, particularly those requiring **risk mitigation strategies**, the following factors should be taken into account:

- Security implications of any adverse information obtained during the vetting process. For example, it may be necessary to give greater weight to some factors than others.
- Significance of any past conduct or circumstances.

- The maturity and character of the vetting applicant.
- Distinctions between isolated or minor blemishes on the vetting applicant's record and information pointing to habitual or significant vulnerabilities.
- Openness, honesty and integrity through the whole recruitment process and vetting process.

## 8.5.5 Developing a working strategy

8.5.5.a Working strategies should be considered to reduce gaps in required information and explore identified risks further. Strategies that can be considered and undertaken are wide-ranging. Examples may include:

- Requesting further information from the vetting applicant by email, phone or video call, [exploratory vetting interview](#) or requesting evidence.
- Requesting a supervisor appraisal.
- Reviewing HR reference responses or verifying data submitted on the job application.
- Requesting further local information such as full case files or speaking with the officer in charge of a case.
- Where information disclosed or discovered during vetting research may be relevant to a previously unresolved investigation, this should be shared with the investigating force to enable further enquiries.
- Making enquiries with HR, or the department manager, into duties specific to the role the vetting applicant is coming from, or being vetted for.
- Seeking advice from subject matter experts. Examples include operational security advisors (OpSy), the economic crime unit, staff associations, staff networks, diversity, equality and inclusion (DEI) advisors, public protection and counter terrorism.
- In the case of application delays or outstanding cases, repeating checks or prompting the vetting applicant for any change of circumstances.

- Notifying the OHU regarding any medical, health or welfare matters.
- Consider submitting a notification for internal staff and officers to:
  - professional standards
  - counter corruption
  - immediate or senior supervisors, considering need for consent from the vetting applicant
  - OpSy or equivalent
  - relevant policy holders
- Seeking clarity of the role requirements from their vetting sponsor for non-police personnel.

### 8.5.5.b Non-disclosure

8.5.5.b Where a relevant matter is not disclosed, the vetting applicant should be contacted for further information, by telephone or where appropriate, email. An exploratory vetting interview may then be required. This is to ascertain whether the vetting applicant can provide a compelling explanation for the non-disclosure. For example, an oversight due to misunderstanding what should be disclosed, as opposed to an intentional attempt to withhold information. Relevant matters include:

- any declarable convictions, cautions and judicial or other formal disposals, whether spent or not – see [8.6.2](#)
- arrests and investigations that have resulted in no further action
- financial difficulties
- relevant family members or associates

This list is not exhaustive.

8.5.5.c Wherever possible, the vetting applicant should be given time to reflect on and recall previous incidents when further vetting enquiries are initiated.

## 8.5.6 Vetting interviews

- 8.5.6.a There are two types of interview that can take place as part of vetting procedures: exploratory vetting interviews and withdrawal assessment interviews.
- 8.5.6.b Exploratory vetting interviews are conducted to enable the FVU to clarify queries, ambiguities or concerns in relation to any relevant vetting information and are not adversarial. Vetting applicants are expected to engage with these exploratory vetting interviews openly and transparently, to allow the FVU to identify and assess any risks and how these might be mitigated. Failure to engage in such a way may lead the FVU to conclude that they cannot manage a risk, and either clearance cannot be awarded, or an existing clearance cannot be maintained.
- 8.5.6.c Outside of a withdrawal assessment procedure, the FVU can conduct exploratory vetting interviews at their discretion at any point during any vetting process or during the lifetime of the clearance. There may be cases where, during an exploratory vetting interview, information is revealed that is so concerning that it could reasonably lead to an existing vetting clearance being withdrawn. The exploratory vetting interview must be stopped and referred to the vetting authority to consider a vetting severity assessment, or the appropriate authority as appropriate.
- 8.5.6.d Exploratory vetting interviews may be used to inform any type of vetting application. Not all applications require an exploratory vetting interview but should be considered where vetting information raises questions or doubts about particular issues, or additional clarity is required.
- 8.5.6.e The exploratory vetting interview may be conducted in person. However, given the logistics of arranging this, exploratory vetting interviews can also be conducted by phone or video call.
- 8.5.6.f For further guidance on preparing, conducting and recording exploratory vetting interviews, see [Appendix L](#).

- 8.5.6.g Exploratory vetting interviews with current and former supervisors can also take place at the discretion of the FVM, to obtain a wider picture of any identified concerns and help inform the vetting assessment process.
- 8.5.6.h Withdrawal assessment interviews are interviews that take place as part of a withdrawal assessment and following a vetting severity assessment. Withdrawal assessment interviews for police officers must be conducted in accordance with [The Police \(Vetting\) Regulations 2025](#) and accompanying guidance. Withdrawal assessment interviews for police staff must be conducted in accordance with a separate withdrawal assessment procedure.

## 8.6 Considering powers and policy

This section outlines the legislation, regulations and policies that are legally significant or commonly support police vetting decision considerations and rationales. Decision considerations and rationales are not limited to those mentioned in this section.

### 8.6.1 Vetting Code of Practice

- 8.6.1.a Under [section 39A of the Police Act 1996](#), chief officers must have regard to the statutory [Vetting Code of Practice](#), which sets out the expectations of chief officers in relation to vetting across police forces in England and Wales. Forces are also expected to adopt the operational guidance and detail contained in this APP as the standard for police vetting. These vetting standards have been developed to help achieve, implement and maintain the fair and consistent application of the standards across the police service.

### 8.6.2 Rehabilitation of Offenders Act 1974 (ROA)

- 8.6.2.a [The ROA](#) primarily exists to support the rehabilitation into employment of reformed offenders who have stayed on the right side of the law. For most purposes, the ROA treats a rehabilitated person as if they had never committed, been charged with, prosecuted for, convicted of or sentenced

for the offence. As such, they are not required to declare spent cautions or convictions, for example when applying for most jobs.

8.6.2.b The **Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975** applies to:

“constables, persons appointed as police cadets to undergo training with a view to becoming constables and persons employed for the purposes of, or to assist the constables of, a police force established under any enactment.”

Therefore, the ROA does not apply to any police officer or Special Constabulary posts. These vetting applicants can be asked about all convictions and cautions, whether spent or unspent. All can be considered as part of the vetting decision-making process, including protected cautions and convictions.

8.6.2.c **ROA – Police staff posts, including PCSOs, and non-police personnel**

8.6.2.d For police staff posts including PCSOs and non-police personnel, **the ROA** does apply with regards to protected cautions and convictions. Any unspent or spent matters that are not protected can still be considered.

8.6.2.e Where the ROA applies, the applicant is considered rehabilitated. The rehabilitation period depends on the sentence imposed.

8.6.2.f Once the rehabilitation period has passed and the matter is considered protected:

- the applicant must be treated ‘for all purposes in law’ as though they had never committed the offence
- the applicant is not required to disclose protected convictions when answering questions relating to their conviction history
- a protected conviction, or failing to disclose one, cannot be used to penalise or exclude a person from any office or employment

- 8.6.2.g Details relating to protected cautions and convictions should not be requested. They do not have to be disclosed and should not be taken into consideration for police staff and NPPV applicants. If they are disclosed, they must not be considered as part of the vetting process.
- 8.6.2.h There is common confusion on what needs to be declared by police staff and non-police personnel. Where integrity concerns exist due to non-declaration, an [exploratory vetting interview](#) to address concerns should be held, either by phone or video call or in person as appropriate.
- 8.6.2.i Summary guidance is available – see [Appendix O](#).

### 8.6.3 Crown Prosecution Service (CPS) disclosure manual

- 8.6.3.a Guidance on the impact of disclosure of convictions, cautions and police misconduct on the force is provided in [Chapter 18](#) of the CPS Disclosure Manual. The document ensures compliance with the [Criminal Procedure and Investigations Act 1996 \(CPIA\)](#). It provides guidance on all information that will be revealed to the prosecutor. This process is commonly referred to as 'taint'.
- 8.6.3.b The impact of appointing a vetting applicant who would be required to disclose convictions, cautions and police misconduct, in accordance with Chapter 18 of the CPS Disclosure Manual and the CPIA, must be carefully considered. It can affect deployment on appointment, and in some cases throughout a career. Generally, the impact will lessen as time passes since the finding. It may be appropriate to grant a clearance where issues are known that invoke the requirements of Chapter 18 of the CPS Disclosure Manual. The vetting applicant must be made aware of the impact that such a requirement will have on their career.
- 8.6.3.c Where the role will not require the vetting applicant to be involved in the evidence chain, the necessity to consider such matters will diminish. However, the vetting applicant should be advised that their ability to serve subsequently in posts requiring involvement in the evidence chain may be limited. The clearance may not be transferrable to such posts.

- 8.6.3.d Particular care must be taken when granting clearance to vetting applicants for roles such as police officers, special constables or police staff in the evidence chain. Under Chapter 18, these police personnel would have to disclose:
- criminal convictions, criminal cautions and penalty notices for disorder
  - criminal proceedings that have not been completed
  - adverse judicial findings
  - police disciplinary case to answer at a misconduct hearing
  - relevant formal written warnings
  - misconduct proceedings that have not been completed
- 8.6.3.e PSDs should judge whether information relating to police officer misconduct is revealed to the prosecutor. This decision must be made on a case-by-case basis and guidance may be sought from the prosecutor if required. PSDs should provide advice to officers on their obligations.
- 8.6.3.f It is recommended that information about these police personnel is also recorded on Centurion or another centralised PSD recording system. Heads of PSD should liaise with heads of forces' criminal justice units on the appropriate local process to ensure relevant information is revealed to prosecutors.

## 8.6.4 **Employment Rights Act 1996 and The Police (Vetting) Regulations 2025**

- 8.6.4.a Vetting clearance is required for all police personnel roles. Different processes must be followed for existing police personnel where vetting clearance is withdrawn. This may occur following a vetting review or if a renewal is declined. If RV clearance is declined, unsupervised access to police assets, including premises, information and systems cannot be granted. If MV clearance is withdrawn, an assessment should be made whether an individual is suitable to hold RV clearance. If so, the force must make all reasonable efforts to find an alternative suitable role at this clearance level – see [9.13.4](#) and [7.3.2](#). If an alternative suitable role is not

available, or the existing police personnel is not suitable to hold RV clearance, they will be subject to dismissal.

- 8.6.4.b For police staff whose RV clearance is withdrawn or cannot to be renewed, dismissal is undertaken in line with [section 98 of the Employment Rights Act 1996 \(ERA\)](#). Dismissal also occurs where MV is withdrawn and the force decides that alternative employment is not possible at a lower vetting clearance. The ERA does not apply to police officers or special constables.
- 8.6.4.c For police officers and special constables whose RV clearance is withdrawn or cannot be renewed, they will be subject to dismissal under [The Police \(Vetting\) Regulations 2025](#). This also applies where MV is withdrawn, and the force decides that alternative appointment is not possible at a lower vetting clearance.
- 8.6.4.d In cases where RV clearance is withdrawn, the matter should be referred to HR for progression.

## 8.6.5 Police regulations

- 8.6.5.a Police officers are subject to a number of regulations that should be considered.
- [The Police Regulations 2003:](#)
    - [Regulation 10\(h\).](#)
    - [Regulation 10A of the Police Regulations 2003, as amended by the Police \(Amendment No. 3\) Regulations 2012.](#)
    - [Paragraph 4 of Schedule 1 to the Police Regulations 2003.](#)
  - [Police \(Conduct\) Regulations 2020.](#)
  - [Police \(Performance\) Regulations 2020.](#)
  - [Police \(Complaints and Misconduct\) Regulations 2020.](#)
  - [Police Appeals Tribunals Rules 2020.](#)
  - [Police Barred List and Police Advisory List Regulations 2017.](#)
  - [Police \(Vetting\) Regulations 2025.](#)

- 8.6.5.b The police barred list shows all officers, special constables and staff members who have been dismissed from policing following gross misconduct proceedings. If a vetting applicant is on the barred list, they are a barred person and they must not be employed or appointed into policing. This includes working for HMICFRS, the Independent Office for Police Conduct and offices of PCCs.
- 8.6.5.c The police advisory list is a register of all officers, special constables and staff members who have resigned or retired during a gross misconduct investigation. It also lists individuals who left the service and subsequently a gross misconduct allegation came to light and is being investigated. These may result in a misconduct hearing to provide an outcome determination as to whether the person would have been dismissed if they were still serving or employed by that force. If a vetting applicant is on the advisory list, the FVU must consider the information regarding the reasons why, as part of the vetting process.
- 8.6.5.d Further information is available on the [College of Policing barred list](#) website – see [3.2](#).

## 8.6.6 Standards of professional behaviour

The [standards of professional behaviour](#) set 10 standards of behaviour expected of those working in policing. An assessment that an individual has breached these standards may lead to misconduct proceedings for which sanctions can be given that can include dismissal.

## 8.6.7 Code of Ethics

- 8.6.7.a The [Code of Ethics](#) provides guidance on ethical and professional behaviour to support those working in policing to understand the expectations of them. It does not, and cannot, cover all circumstances but focuses on areas where experience suggests guidance is needed. The ethical policing principles support ethical decision making, helping those working in policing to do the right things for the right reasons and in the right way.

## 8.6.8 Counter corruption APP

8.6.8.a **Counter corruption APP** is security marked official-sensitive and is available to counter corruption professionals through the Knowledge Hub. It provides guidance to practitioners about the threat of corrupt activity by police officers, staff, partners and volunteers. It addresses how this corruption is a risk to security of information and operational activity in policing. It provides guidance to forces on developing local policies which should be considered during the vetting process. This includes:

- notifiable associations
- business and additional occupations
- social media use
- unmanageable debt
- gifts and gratuities

8.6.8.b FVUs should liaise directly with their CCUs to obtain relevant guidance and advice about this content.

## 8.6.9 Information management APP

8.6.9.a **Information management APP** provides up-to-date guidance on management of police information. This includes information that is useful to consider during the vetting process, particularly:

- **Freedom of Information Act 2000** – understanding how requests can be made to public sector organisations for all recorded information they have on any subject.
- **DPA 2018** – understanding that any individual has the right to request access to all the information held about them, that disclosure of third-party data is prohibited except in extreme cases – see **6.3** – and that appropriate security measures should be in place to protect any personal data held.
- **Computer Misuse Act 1990** – understanding risks relating to corruption vulnerabilities, such as financial or notifiable associations,

that could lead to accessing data unlawfully for personal interest or to take part in another crime.

## 8.6.10 UK Government Care Leaver Covenant for England

8.6.10.a The **Care Leaver Covenant** is intended to support care leavers' successful transition into adulthood. Its principles should be taken into consideration for vetting applicants who are care leavers. This is particularly relevant when assessing risks identified in relation to co-resident associates and family members.

## 8.6.11 Association of Chief Police Officers (ACPO) (2013) Guidelines on the safe use of the internet and social media by police officers and police staff

8.6.11.a This provides **guidelines on the safe use of the internet and social media**. It should be considered when reviewing open source enquiry results, along with any related professional standards matters and intelligence. There may also be local force guidance available on the use of internet and social media.

## 8.7 Identifying options and contingencies

8.7.1 Once all required vetting information has been gathered, risks and threats identified and assessed through working strategies, and related powers and policies acknowledged, options in managing the identified risks should be considered. Risk management options should take into account available risk mitigation strategies, if they could be effectively managed and whether the vetting applicant is trustworthy, with enough assurance that they will adhere to any conditions – see **assessing the criteria for trustworthiness**. See **9.7** for an additional option for MV or NPPV level 3 clearance holders.

### 8.7.2 Risk mitigation strategies

8.7.2.a Forces should have processes in place, supported by local policy, to assist with managing risks associated to personnel. However, options are not limited only to these processes. Case-specific risk mitigation

strategies should only be accepted where there is confidence they can mitigate or reduce risks, and be managed and monitored effectively. Risk mitigation strategies must be achievable, reasonable, proportionate and justifiable, with responsibilities of individuals or units clearly defined.

8.7.2.b **Clearance with conditions** or restrictions seeking to mitigate identified risks is an option available to vetting decision makers.

8.7.2.c Risk mitigation strategies should be case-specific and may include:

- Geographical posting restrictions.
- Additional reporting requirements.
- Regular focused vetting reviews.
- Restrictions on the type of role the personnel can undertake.
- System access restrictions and usage monitoring.
- Shorter clearance validation periods.
- Having a conversation with the vetting applicant to discuss specific concerns and provide tailored risk management guidance.
- Engagement with supervisors and welfare departments.
- Where applicants live in an HMO, restrictions on home working or storage of uniform could be used if necessary and proportionate – see **6.5.4.e**.

8.7.2.d Strategies should take into account local policies in relation to unmanageable debt and notifiable or reportable associations.

8.7.2.e FVUs, CCUs, PSDs and HR departments should work together where necessary to create and implement effective risk mitigation strategies. This includes consulting with the department to which the vetting applicant is being recruited if appropriate. Considerations of effective risk mitigation strategies should be recorded and include details such as:

- those consulted or participating in the discussion and their roles
- defined and agreed responsibilities for implementing, managing and maintaining the risk mitigation tasks in each case

- capacity and capability to support or undertake the risk mitigation tasks of those responsible
- how the tasks will be overseen and monitored

8.7.2.f There may be cases where risk mitigation strategies could be implemented, but the force does not have the capacity or capability to do so. The department responsible should provide the rationale for this decision to the FVU. This should be recorded on the vetting file and clearance declined. For existing internal vetting applicants, every effort should be made to facilitate available risk mitigation strategies. Declining on renewal or withdrawing clearance should only be considered in significant circumstances. Wherever possible, the vetting applicant should be made aware of the considerations and decision rationale.

8.7.2.g Where it is possible to discuss potential risks with the vetting applicant, it is advised that an exploratory vetting interview is carried out. This may help further understand the vetting applicant's knowledge of the identified potential risk areas. Staff associations, trade unions or DEI advisors may be consulted to aid understanding of relevant cultural issues or matters relevant to known protected characteristics. This is to assist understanding of any vulnerability, threat and potential impact on the force, the public and the vetting applicant.

8.7.2.h Risks may be identified that relate directly to the vetting applicant, but where their supervisor or other third party, is not required to manage that specific risk. Notification of such risks should only be made with consent from the applicant. This would only be possible where the applicant has previously been informed of the risk.

8.7.2.i Notifying supervisors or sponsors of potential risks they will need to manage as part of a risk mitigation plan does not require consent from the vetting applicant.

8.7.2.j Referral of these matters to PSDs or CCUs, in accordance with standard business practice and policies, does not require consent.

- 8.7.2.k The vetting applicant should be made aware of any risk mitigation, strategies or conditions. This is particularly important where it places a duty or obligation on the vetting applicant. However, there may be cases where there is a justifiable reason why this is not practicable, for example, where covert tactics are used – see [disclosure of information to the vetting applicant](#). It is advisable that the vetting applicant signs a written notification to confirm their awareness.
- 8.7.2.l Any risk management strategy should be subject of robust oversight, defined periodic [focused vetting reviews](#) and amendments, as appropriate. The timescales for focused vetting reviews will be case-specific.

## 8.8 Taking action and reviewing what happened

- 8.8.1 The 'take action' section of the NDM brings the vetting decision maker to the point of making a vetting decision. It outlines factors that support granting or declining police vetting clearance. A detailed rationale [must be recorded](#) by the decision maker when declining, suspending, withdrawing or granting clearance, including where restrictions or conditions are applied. This rationale should make clear the consideration of adverse information and identified risks. For further information regarding outcomes, see [vetting decision](#).
- 8.8.2 Vetting decision makers should assess information on a case-by-case basis. They should consider the specific circumstances of each case and nature of the information revealed.
- 8.8.3 The openness of the vetting applicant is considered a factor supporting clearance. It demonstrates honesty, can support further risk management activities and means that specific advice can be provided. However, honesty in itself does not mitigate the risks associated with the information disclosed. It should not be used as an overriding factor to grant police vetting clearance.

## 8.8.4 Reviewing what happened

8.8.4.a The NDM is a cyclical model. It complements the continual process of police vetting. It understands that when new information is available, the decision-making process starts again for a reassessment of the original decision. In most cases, new information will relate to a change in the vetting applicant's circumstances. However, it can also include changes in legislation and national policies or initiatives, following increased awareness of emerging threats that alter national risk acceptance levels. Local risk appetites may also evolve over time. These should be considered when analysing and reflecting on whether a previous vetting decision effectively addresses current understanding of risk.

8.8.4.b Police vetting is a continual process, as confirmation of clearance only provides assurances at a certain point in time. To maintain police vetting clearance:

- change of circumstances must be reported – see [3.8.4](#).
- [annual integrity and vetting reviews](#) must be carried out
- [vetting reviews](#) must be carried out throughout the clearance period where required
- for certain specified role moves, supervisor appraisals must be obtained
- vetting clearances must be renewed at the end of their validity period – see [renewing police vetting clearances](#)

## 9. The vetting decision

- 9.1 Vetting decisions should only be made at the appropriate level, usually by the FVM or nominated individual. Decisions should be made once the decision maker has gathered the necessary information and intelligence to enable an informed, balanced and proportionate decision. They must make their decision in accordance with the [Vetting Code of Practice](#), this APP and [The Police \(Vetting\) Regulations 2025](#).
- 9.2 In assessing information and intelligence revealed as part of the vetting process, the decision maker should apply a [two-stage test](#):
1. Are there reasonable grounds for suspecting that the vetting applicant, a family member or other relevant associate:
    - is or has been involved in criminal activity?
    - has financial vulnerabilities (vetting applicant only)?
    - is, or has been, subjected to any adverse information?
  2. If so, is it appropriate, in all the circumstances, to decline or withdraw vetting clearance?
- 9.3 In all cases the cogency, reliability and credibility of adverse information from intelligence, information or allegations, including the intelligence grading, should be considered. The balance of probabilities does not apply, however, adverse information should be considered within the context of all material factors. This includes where possible, any explanation by the vetting applicant. The decision to withdraw or decline on renewal vetting clearance for police personnel is particularly serious in the consequences for their professional career. The vetting decision should take account of this, and the decision maker be fully satisfied that the identified risks are so great, that withdrawing the vetting clearance is the only reasonable option.
- 9.4 The decision maker should consider the trustworthiness and integrity of the vetting applicant to be assured of their suitability to work in policing.

“Professional standards rightly impose on those who aspire to them a higher obligation to demonstrate integrity in all of their work.”

**Rhys Williams v Solicitors Regulation Authority  
[2017] EWHC 1478 (Admin).**

- 9.5 The police vetting process assists in promoting the public’s trust and confidence in the police service as a whole. Therefore, all vetting decisions must consider factors relating to protecting the public. The [guidelines on vulnerability-related risk](#) can be used to assist the vetting decision maker’s professional judgement.
- 9.6 The vetting decision maker should review the case and decide whether or not to grant clearance. In all cases, a clear rationale should be recorded, taking full account of all relevant factors contributing to the decision. For vetting reviews and renewals, [Appendix N](#) should be taken into consideration.
- 9.7 To grant MV or NPPV level 3 clearance, the force should ensure it has no reason to doubt the integrity of the vetting applicant or their susceptibility to improper external influences. There may be cases where an MV or NPPV level 3 clearance holder may no longer satisfy the requirements for the highest level of vetting. It may be possible to consider their suitability to hold RV or a lower level of NPPV clearance instead. For example, if the clearance holder experiences circumstances that create unsuitable financial vulnerabilities. See [8.6.4.a](#), [7.3.2](#) and [9.13.4](#).

## 9.8 Decisions do not establish a precedent

- 9.8.1 Where clearance has been granted with no identified risks, it is negligent to assume that this will always remain the case in the future. Full vetting reviews, focused vetting reviews and vetting renewals allow a reassessment of current clearance held. They support the identification of any new risks or vulnerabilities at the earliest opportunity.
- 9.8.2 If vetting clearance supported by a risk mitigation strategy is granted to a vetting applicant with associated risks or vulnerabilities, this does not

establish a precedent. Circumstances can change. Furthermore, the vulnerability may mean that the clearance is not suitable to be transferred to another post. An appropriate condition of clearance could be to require a vetting review for relevant internal moves, or to restrict clearance to the original post.

- 9.8.3 Declined vetting clearance does not set a precedent for any future vetting applications. Vetting clearance being declined previously cannot be the rationale for a subsequent vetting decision, where the vetting applicant's circumstances have changed or where any risk has been sufficiently reduced or can be mitigated. However, previous vetting decisions may be relevant and should be explored by the FVU.

## 9.9 Two-stage test considerations

- 9.9.1 The test detailed at [9.2](#) is the standard test to be applied to all vetting applications. However, the clearance level sought, or scope of available information, may require consideration of additional information or factors when applying stage two of the test.
- 9.9.2 Where MV or NPPV level 3 clearances are sought, vetting decision makers should apply a higher threshold in recognition of the additional access to sensitive assets that these clearance types enable. They should be satisfied that there is no reason to doubt the integrity of the vetting applicant or their susceptibility to improper external influences. See [management vetting \(MV\)](#) and [NPPV level 3](#).
- 9.9.3 For transferees and re-joiners, there are richer information sources available, including how they have conducted themselves while serving in a vetted post. These should be considered to ensure there is no reasonable basis to question the integrity of the vetting applicant. See [transferees](#) and [transfer or other movement between forces during, or after, professional standards investigations](#).
- 9.9.4 Proportionality must be considered in all assessments, therefore adverse information in isolation is unlikely to lead to declined clearance. All

relevant factors, including the age and reliability of the adverse information, and its relevance to the post applied for, should be assessed.

## 9.10 Clearance with conditions

- 9.10.1 Where threats have been identified and risk mitigation strategies are considered proportionate, achievable and maintainable, vetting decision makers may grant clearance with conditions, including any restrictions. See [identifying options and contingencies](#).
- 9.10.2 Where a clearance with conditions is considered, a full decision rationale, including risk management owner, review dates and any safeguards should be recorded and maintained. This should be completed by the FVM or nominated individual. There is a presumption of transparency. The applicant should be informed of the risk management plan and any conditions unless there is a justifiable reason not to do so. The applicant's written agreement to abide by the conditions should also be recorded.

## 9.11 Partially approved clearance

- 9.11.1 Some elements of the police vetting process may carry low risk but are dependent on third party checks. Police forces may have local policies allowing partially approved clearances to be granted temporarily for outstanding lower risk areas that may cause excessive disproportionate delays. Partially approved clearances require a detailed rationale including risk mitigations, details of the risk owner, review dates and any other safeguards. Such cases should be easily identifiable, reportable and regularly monitored or reviewed. Any local policy should be regularly reviewed and informed by the FVU's reporting and monitoring.
- 9.11.2 The acceptance of this risk should lie with the department to which the vetting applicant is being recruited. Partially approved clearances should only be used in exceptional circumstances where the force agrees there is a justifiable business need to accelerate the appointment.
- 9.11.3 The partially approved clearance may be withdrawn on receipt of adverse information from outstanding checks. There is therefore a risk of the

vetting applicant finding themselves without employment if they have resigned from, or refused other employment. This risk should be made clear to the vetting applicant.

## 9.12 Suspension

### 9.12.1 Suspension of police officers

9.12.1.a Where adverse information is revealed after clearance has been granted, under [The Police \(Vetting\) Regulations 2025](#), the vetting authority will conduct a severity assessment which may lead to a withdrawal assessment. Under Regulation 13 of [The Police \(Vetting\) Regulations 2025](#), a police officer may be suspended to mitigate any risk while any such assessment is conducted. Any suspension must be conducted in line with [The Police \(Vetting\) Regulations 2025](#) and accompanying guidance.

### 9.12.2 Suspension of clearance of police staff

9.12.2.a Where adverse information is revealed after clearance has been granted, it may be appropriate for forces to suspend vetting clearance while assessment of suitability for vetting clearance is ongoing. Police staff must be able to make representations against a decision of suspension and any such suspension must be regularly reviewed to ensure the reasons for the suspension are still satisfied. Vetting clearance should not be suspended for any longer than is necessary and reasonable.

### 9.12.3 Suspension of NPPV clearances

9.12.3.a Where adverse information is revealed after clearance has been granted, it may be appropriate for forces to suspend vetting clearance while assessment of suitability for vetting clearance is ongoing. The vetting sponsor must be informed of the requirement to suspend clearance and, where required, the vetting applicant's employer must be informed. The vetting applicant must not represent policing or have access to police assets or premises during their period of suspension. Following a decision to suspend clearance, an assessment of continued suitability must be

conducted expediently to prevent undue impact upon both the vetting applicant and the service provided. If clearance cannot be held, it will be withdrawn.

## 9.13 Declining and withdrawing clearance for existing internal police personnel

- 9.13.1 Granted vetting clearances can be declined or withdrawn at any level by the vetting authority at any time, where there is reasonable justification. Where clearance may be withdrawn, this process will differ dependent on the type of vetting applicant.
- 9.13.2 New risks can be identified or current risks can increase following a notification of change of circumstances, a vetting review or through other means such as receiving new intelligence. In these cases, [risk mitigation strategies](#) should be considered. Strategies may include setting clearance conditions and using close supervision. These should be explored with the CCU, PSD and HR as appropriate. Where risk mitigation strategies are not sufficient to effectively manage the identified risk(s), a higher level of clearance may not be granted or current clearance must be reassessed and may lead to withdrawal.
- 9.13.3 If the vetting clearance holder does not engage after reasonable steps are taken with the ongoing vetting process, their vetting clearance cannot be sufficiently maintained. This creates an unknown risk to the police service and to the public and clearance must be declined or withdrawn.

### 9.13.4 Declining clearance for existing internal police personnel

- 9.13.4.a A vetting applicant holding RV clearance may apply for MV clearance. In cases where they are unsuitable to hold MV, but remain suitable to hold RV, the MV clearance will be declined. The rationale for not granting the higher level of clearance should be discussed with the vetting applicant, unless the reasons cannot be disclosed – see [6.3.1](#). The vetting applicant

may appeal and make representations to a decision maker not involved in the original decision. The appeal decision is final.

9.13.4.b When an application for MV is declined, an assessment of the vetting applicant's continued suitability to hold RV should be completed. If the applicant may not be suitable to hold RV, a withdrawal assessment procedure should commence.

9.13.4.c In cases where clearance has expired and the new application is being declined on renewal, a withdrawal assessment procedure should commence.

### 9.13.5 Withdrawing clearance for existing internal police personnel

9.13.5.a Vetting clearance is required for all police personnel roles. As set out in this section, the vetting withdrawal process is different dependent on the type of vetting applicant. A decision to withdraw vetting clearance from existing internal police personnel has severe consequences. Due to the significant impact on employment or appointment status, the standards of procedural fairness are necessarily required to be elevated. If adverse information leads to a withdrawal assessment procedure where the outcome is vetting clearance is withdrawn, the individual will undergo dismissal – see [8.6.4.a](#) and [9.7](#).

9.13.5.b Police officers are subject to the withdrawal assessment and dismissal procedure under [The Police \(Vetting\) Regulations 2025](#).

9.13.5.c Police staff will be subject to a separate withdrawal assessment procedure and dismissed under the [Employment Rights Act 1996](#).

9.13.5.d Where vetting clearance is withdrawn for existing internal police personnel, they have a right to appeal against the decision – see [10.7](#).

9.13.5.e If the reason for withdrawal is so significant that it is unlikely the vetting applicant would ever gain clearance, an intelligence report should be created in the PND. This should record details of the department retaining

relevant information – see [Appendix C](#). This will enable the information to be assessed in future police vetting applications.

## 9.14 Declining and withdrawing clearance for other vetting applicants

- 9.14.1 Where a decision is made to decline vetting clearance, the vetting decision maker should ensure they have followed the requirements under [maintaining records](#).
- 9.14.2 The vetting sponsor must be notified of the outcome to allow them to manage their recruitment or operational needs.
- 9.14.3 The decision must be communicated directly with the vetting applicant by the FVU or the vetting sponsor, in line with [communicating the decision](#).
- 9.14.4 Where the vetting applicant is declined vetting clearance as a transferee, refer to [7.5.1.k](#), [7.5.1.l](#) and [7.5.1.m](#).
- 9.14.5 The right to appeal against the vetting decision is available to all vetting applicants. Where an appeal against the decision is submitted, the [conducting appeals – other vetting applicants](#) process should be followed.
- 9.14.6 Where an NPPV level 3 clearance holder does not return a signed annual NPPV level 3 annual vetting notice, they should be contacted either directly or through the sponsor. It should be checked that they received and understand the requirement. If the notice is still not returned, the NPPV level 3 vetting clearance should be assumed as no longer required and it should be terminated.
- 9.14.7 If the reason for decline or withdrawal is so significant that it is unlikely the vetting applicant would ever gain clearance, an intelligence report should be created in the PND. This should record details of the department retaining relevant information – see [Appendix C](#). This will enable the information to be assessed in future police vetting applications.

## 9.15 Communicating the decision

- 9.15.1 Vetting sponsors, including recruitment or procurement units, must be informed of the vetting decision to allow them to continue with their onboarding processes.
- 9.15.2 Dependent on local procedures, the FVU may also inform the vetting applicant of their vetting clearance details directly. Where **clearance with conditions** or **partially approved clearance** has been granted, the FVU should ensure the vetting applicant and, where required the vetting sponsor know about conditions and restrictions. This will allow them to accommodate these. This would be alongside any agreed **risk mitigation strategy** disclosures.
- 9.15.3 Vetting review and renewal outcomes are likely to be communicated directly by the vetting unit to the existing vetting clearance holder. Notifications should also be made to meet the requirements of local processes. These may include vetting sponsors, department administrators and business assurance teams.
- 9.15.4 If vetting clearance is declined or withdrawn, the vetting applicant must be informed of the reasons at the time of the decision or on request dependent on local procedure, unless there is valid reason not to do so. This supports the basic standards of procedural fairness. Where forces cannot provide the full rationale, they must give as much information as possible – see **disclosure of information to the vetting applicant**.
- 9.15.5 Correspondence with the vetting applicant should state that the decision has been made in accordance with this APP. It should include appropriate section or paragraph references. The vetting applicant must be informed of their right to appeal against the decision to withdraw or decline clearance.

## 10. Vetting appeals

- 10.1 An appeals process must be in place for any case where vetting clearance, at any level, is declined or withdrawn, with the exception of [10.2](#). As set out in this section, the vetting appeals process is different dependent on the type of vetting applicant. Template documents to support the appeal process are available as separate guidance from the College of Policing.
- 10.2 Transfers between forces are voluntary arrangements with no automatic right of appeal. However, where the decision to discontinue the transfer application is based on vetting concerns, it is good practice for an appeal process to be in place.
- 10.3 There are three grounds on which an appeal against the vetting decision can be submitted. These are:
- the decision was unreasonable
  - there is information that could not reasonably have been considered by the original decision maker or evidence that could not reasonably have been considered as part of the withdrawal assessment, which could have materially affected the decision, or
  - there was a breach of the procedures set out in [The Police \(Vetting\) Regulations 2025](#) or other vetting withdrawal or decline procedure, or any unfairness which could have materially affected the decision.
- 10.4 All vetting appeals must be dealt with as promptly as possible to support operational requirements. This allows the vetting applicant to understand their employment options as soon as possible.
- 10.5 Decisions that are made on appeal are final. The Police (Vetting) Regulations 2025 have two appeal stages – an appeal panel and a further potential appeal to a Police Appeals Tribunal.
- 10.6 The result of the appeal should be communicated to the vetting applicant by the appeal decision maker or their representative, not the original decision maker. The vetting applicant should be provided with as much

information as possible, as outlined in [communicating the decision](#) and as soon as practicable.

## 10.7 Conducting appeals – Existing internal police personnel

- 10.7.1 Vetting clearance is required for all police personnel roles. If adverse information leads to a withdrawal assessment procedure where the outcome is vetting clearance is withdrawn, there must be a process of appeal.
- 10.7.2 Vetting appeals of withdrawal of vetting clearance for police officers will be conducted as set out in [The Police \(Vetting\) Regulations 2025](#) and associated guidance.
- 10.7.3 Vetting appeals of withdrawal of vetting clearance for police staff will be subject to a separate appeals process.

## 10.8 Conducting appeals – other vetting applicants

- 10.8.1 There will be different appeal processes for other vetting applicants and [existing internal police personnel](#). In most cases, the vetting appeal process for other vetting applicants is normally carried out through written representations. Personal representation is allowed at the discretion of the individual or persons considering the appeal if they are satisfied it will add value to the process.
- 10.8.2 In these cases, forces must develop their own local policies for considering appeals with the option of:
- having a single vetting appeal decision maker who:
    - is independent of the original decision-making process
    - has not previously been involved in any aspect of the case
    - has a working knowledge of the Vetting Code of Practice and this APP
    - is independent from force recruitment activities
    - does not present a conflict of interest relating to the case

- always holding vetting appeal panels
- setting out clear criteria for when a vetting appeal would be considered by a single vetting appeal decision maker and when a vetting appeal would be considered by a vetting appeal panel

## 10.9 Vetting appeal panel for other applicants

10.9.1 Where forces choose to hold a vetting appeal panel for some or all other vetting applicant appeals, the vetting appeal panel chair must be an individual of suitable seniority who meets the criteria set out in [10.8.2](#).

10.9.2 The vetting appeal panel chair:

- Is the final vetting appeal decision maker. They will take into account the vetting applicant's appeal, their vetting file and the insights and views of vetting appeal panel members.
- Must provide a full, detailed decision rationale to be held on the vetting file, documenting and commenting on all points raised by the vetting appeal panel.
- Is responsible for communicating the vetting appeal decision to the vetting applicant, following the criteria set out in [communicating the decision](#) as soon as practicable.

10.9.3 Vetting appeal panel members must:

- Be independent of the original decision-making process.
- Not have previously been involved in any aspect of the case.
- Not have a conflict of interest relating to the case.
- Have working knowledge of the [Vetting Code of Practice](#) and this APP or have completed the [police vetting appeal panel workbook](#). This is available on [College Learn](#) to authorised users – login required.
- Be fully aware of and understand their obligations to notify the chair if they have a conflict of interest on the case to be discussed. This also applies to the case being discussed if it becomes apparent during the vetting appeal panel meeting.

10.9.4 When deciding to have a vetting appeal panel for other applicants, forces should:

- Have a written local policy detailing how the panels will be made up, expectations and responsibilities, data management processes and requirements around conflicts of interest.
- Ensure there are sufficient potential panel chairs and members who meet the criteria set out in [10.8.2](#) and [10.9.3](#). This is to ensure availability and resilience of resource demand to complement the intention of paragraph [10.4](#).
- Ensure panel members are aware of and understand their responsibilities as set out in paragraph [10.9.3](#).
- Inform the vetting applicant that their appeal will be heard at a vetting appeal panel meeting and provide an overview of how the process works.

10.9.5 Separate vetting appeal panel guidance for other vetting applicants is available from the College of Policing.

## 10.10 Appealing clearance with conditions

10.10.1 A vetting applicant may be granted police vetting clearance with conditions on recruitment, or following a change of circumstances, where clearance was only deemed suitable with risk management conditions. Vetting applicants should be offered the opportunity to appeal the original conditions if they feel these are no longer relevant to their circumstances. The appeal will be considered by the FVM.

10.10.2 Not all conditions can be disclosed to the vetting applicant. See [disclosure of information to the vetting applicant](#) for restrictions.

10.11 Where NSV clearance is declined or withdrawn, see [national security vetting appeals procedure](#).

## 11. National security vetting (NSV)

- 11.1 **UKSV** is the single government provider of NSV. This section gives an overview of the processes that should be followed by FVUs. However, forces should obtain detailed information on NSV levels and processes directly from UKSV.
- 11.2 NSV is required for access to government assets and is designed to counter threats to these. Therefore, NSV processes examine more limited information sources compared to police vetting. NSV also has a distinct decision-making process. Police vetting is designed to counter a wider threat profile, with a number of identified threats that are unique to law enforcement. NSV offers very limited assurance concerning risks to police assets, police information and public safety. It therefore does not enable any access to police assets, police information or give assurance that holders can safely work with the public.
- 11.3 Forces should be aware of the above when considering applying NSV clearance to posts.
- 11.4 Where the police service sponsors NSV clearance, the vetting applicant must hold or be applying for an associated level of police vetting clearance. A new vetting application for the associated level of police vetting will be required prior to applying for NSV clearance, unless the police vetting was granted in the previous 12 months and the vetting applicant's circumstances have not changed. Police sponsored NSV clearance becomes invalid if the holder no longer has or maintains valid police vetting clearance, and the NSV clearance is not transferred to another organisation. FVUs should maintain vetting applicants' NSV clearance status on the UKSV system.
- 11.5 There is a cost to the police service to obtain NSV clearances for police and non-police personnel. Therefore forces should be confident that police vetting clearance will be granted prior to sponsoring an NSV application. For practical reasons and operational timescales, the NSV application may be initiated before police vetting clearance is granted.

This is due to the length of time it takes for an application to be processed.

- 11.6 Police vetting clearance decisions must be completed before finalising police sponsored NSV clearances.
- 11.7 Details on role and access requirements associated to NSV levels can be found on the [national security vetting clearance levels](#) website. The [Cabinet Office security policy framework \(SPF\)](#) sets expectations of how government organisations apply protective security to ensure they can function effectively, efficiently and securely.
- 11.8 Police-sponsored vetting clearance holders must notify their force vetting authority of any change of circumstances. They are also required to notify the UKSV of any significant change to their personal circumstances. Information on this process can be found at [UKSV National Security Vetting: change of personal circumstances](#).

## 11.9 Renewing NSV clearances

- 11.9.1 UKSV use the term 'formal review' on expiry. For the purposes of this APP, the term 'renewal' is used instead to avoid confusion with police vetting reviews. NSV clearances are valid for limited periods and require renewal on expiry. The table below summarises the periods at which different NSV clearances should be renewed. For further information, [see the UKSV website](#).

Clearance level	Personnel type sponsored	Renewal period	Police vetting clearance required
<b>Accreditation check</b>	Police personnel	1-5 years	RV
	Non-police personnel	1-5 years	NPPV 2 full
<b>Counter terrorism check (CTC)</b>	Police personnel	10 years	RV
	Non-police personnel	5 years	NPPV 2 full

Clearance level	Personnel type sponsored	Renewal period	Police vetting clearance required
or level 1B			
Security check (SC)	Police personnel	10 years	MV
	Non-police personnel	7 years	NPPV 3
Developed vetting (DV)	Police personnel	7 years	MV
	Non-police personnel	7 years	NPPV 3

11.9.2 Where DV is held, and SC in specific instances, the NSV vetting clearance holder must complete a [UKSV annual security appraisal](#). They must ensure their line manager, supervisor or security controller completes their part. This is a separate, additional process to the police vetting annual integrity and vetting reviews.

## 11.10 Transferring and sharing NSV clearances

11.10.1 A vetting applicant may hold a current valid NSV clearance and seek employment or appointment with a police force where the role also requires NSV clearance. A request to transfer or share clearance should be submitted through the national security vetting solution (NSVS) portal. The owning organisation should then review, consider, approve or decline the transfer or share.

11.10.2 A vetting applicant may hold a current valid NSV clearance and be seconded to a role with a partner agency which requires NSV clearance. The organisations should arrange to share the clearance for the duration of the secondment. Any new information received by the police force or partner agency that the vetting applicant is seconded to, must be shared with the parent force.

11.10.3 Further sponsor actions may be required through the UKSV case management system.

## 11.11 NSV appeals procedure

11.11.1 In a policing context, all NSV clearances must be predicated on the relevant level of police vetting. Police-sponsored NSV clearance becomes invalid where personnel no longer hold or maintain required police vetting clearance and NSV clearance is not transferred to another organisation. In this situation, there is no appeals process available as the NSV clearance has been invalidated rather than withdrawn or declined – see [11.4](#).

11.11.2 NSV clearance may be declined or withdrawn by the police vetting authority for existing police personnel and those working for the police service under contract. In these cases, an internal appeals process must be made available as determined by the force. It is good practice to follow the existing appeal process available for police vetting.

11.11.3 If the internal appeal of the NSV clearance decision is unsuccessful and the vetting applicant is dissatisfied with the result and rationale, they can appeal to the independent [security vetting appeals panel](#) (SVAP). Applications to appeal the decision to SVAP must be submitted in writing within 28 days of receiving the internal appeal outcome. Appeal decisions by the SVAP are final. SVAP does not consider declined police vetting clearances.

11.11.4 There is no mandated appeals process for external vetting applicants where NSV clearance has been refused and no job offer has been made. Any correspondence with an external applicant entering the appeals process should state clearly that the appeal relates to the police vetting decision only. There is no appeal against the decision to refuse NSV clearance to external applicants. Therefore SVAP cannot be used as an avenue of challenge.

11.11.5 There may be cases where an external applicant for a post which requires police vetting and NSV successfully obtains police vetting, but the NSV

clearance is refused. In such cases there is no avenue of internal appeal, and the applicant does not have the right to approach SVAP.

11.11.6 Further information on the NSV appeal process can be found on the [United Kingdom Security Vetting: Applicant](#) website.

## 11.12 NSV quick links

- [NSV clearance levels](#), including review and renewal periods.
- [Information for existing NSV clearance holders](#). This covers responsibilities as a clearance holder, how to maintain clearance, how to report a change of circumstances and line manager responsibilities.
- [Annual security appraisal form](#), with guidance on how to complete this on the NSVS portal.

## Appendices

### Appendix A – National vetting data framework

Information in vetting will be recorded in line with the national vetting data framework to enable consistency and comparison through a national data dashboard.

#### Risk categories for disproportionality monitoring

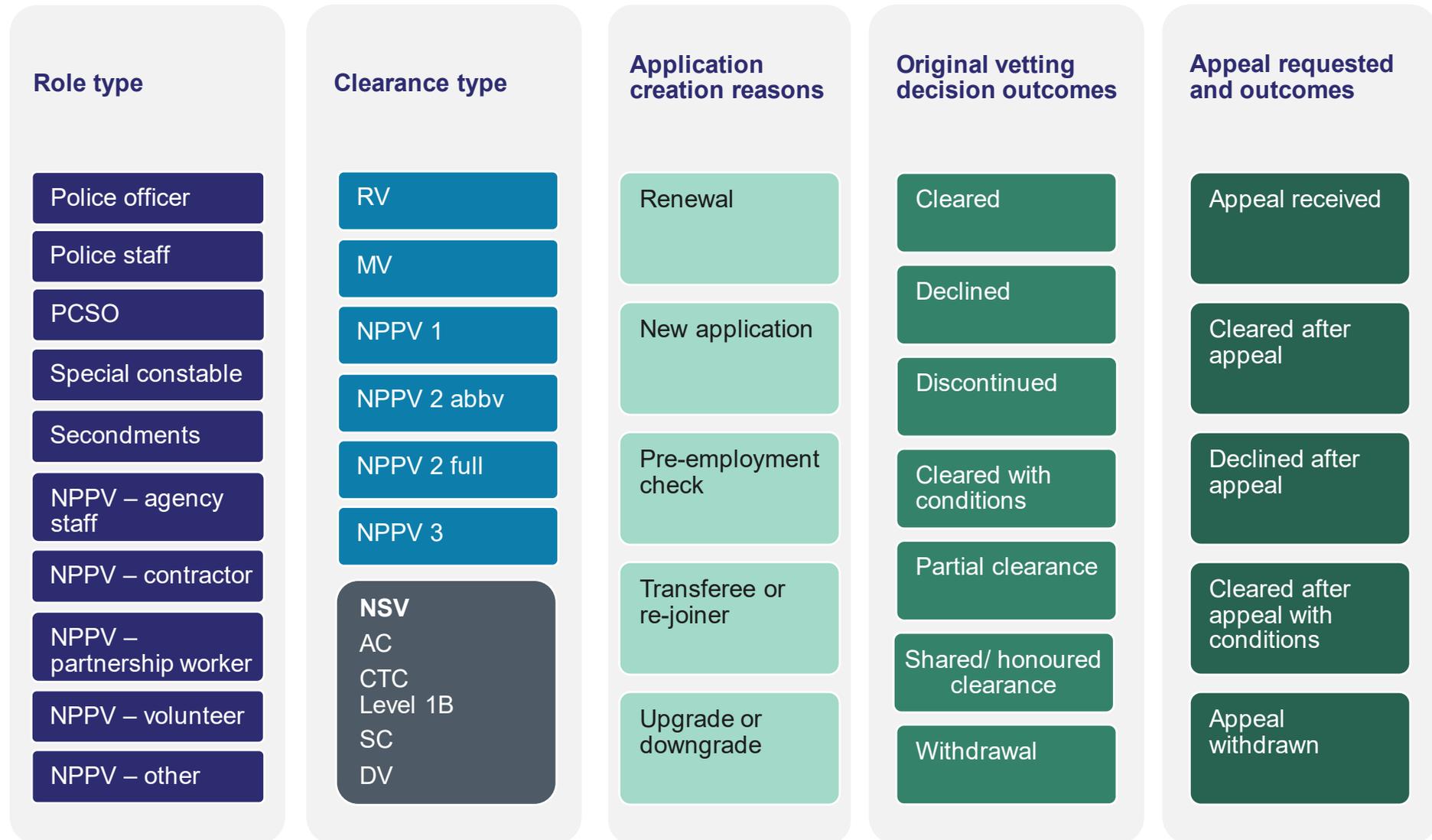
Risk reason	APP section references	Covers
<b>Essential criteria</b>	<ul style="list-style-type: none"> <li>▪ 3.3.1, 3.3.2, 3.3.3, 3.3.4, 5.3, 5.6.8, 6.4, 6.5.16</li> </ul>	Residency, full information not provided, identity verification, consent, non-surrendered business interests that cause a conflict of interest.
<b>Professional standards department</b>	<ul style="list-style-type: none"> <li>▪ 3.4.6, 6.5.8, 6.5.9, 6.5.11, 7.4.6.e-f, 7.5.1.d, 7.5.2, 8.5.3, 8.6.5.b-d, 8.6.6, 8.6.7, 8.6.8, 8.7.2, 9.8, 9.11, 9.12, Appendix N</li> </ul>	History or live complaint, MoD, anti-or counter corruption information, flagstone marker.

Risk reason	APP section references	Covers
<b>Convictions, cautions and impending cases</b>	<ul style="list-style-type: none"> <li>▪ 3.3.5, 6.5.1, 6.5.2, 6.5.10, 6.5.19, 6.5.20, 8.6.2, 8.6.3, Appendix N</li> </ul>	Includes biometric vetting hits that lead to an investigation or conviction.
<b>Taint</b>	<ul style="list-style-type: none"> <li>▪ 7.3, 8.6.3</li> </ul>	Where conviction or caution would be accepted by vetting but taint impact too great on force. Decision often made by head of PSD.
<b>Intelligence</b>	<ul style="list-style-type: none"> <li>▪ 3.2.2, 3.3.3, 3.3.6, 3.4.5, 3.4.6, 5.10, 6.5.1, 6.5.2, 6.5.3, 6.5.4, 6.5.5, 6.5.14, 6.5.15, 6.5.18, 6.5.19, 8.5.3, 8.5.4, Appendix N</li> </ul>	References, reported behaviours, non-conviction data, substance misuse information, untested allegations, other force information, adverse information, intelligence, inappropriate behaviour recorded or through recruitment or vetting process, DBS check.
<b>Open source</b>	<ul style="list-style-type: none"> <li>▪ 6.5.7, Appendix N</li> </ul>	Social media, websites, news articles.

Risk reason	APP section references	Covers
<b>Associations</b>	<ul style="list-style-type: none"> <li>▪ 8.5.3, 8.6.8, 8.6.9, 8.6.10, Appendix N</li> </ul>	Location, severity, unmanageable risk in force or organisation, conflict of interest, potential involvement or implicated.
<b>Financial vulnerability</b>	<ul style="list-style-type: none"> <li>▪ 6.5.6, 6.5.12, 6.5.13, 8.5.3, 8.5.4, 8.6.5, Appendix N</li> </ul>	Financial history, current financial information, compulsive or excessive gambling.
<b>Integrity</b>	<ul style="list-style-type: none"> <li>▪ 3.8, 3.9, 3.10, 6, 8.5.3, 8.5.4, 8.6.6, 8.6.7, Appendix N</li> </ul>	Non-disclosure, omitting information, providing false or misleading information, lack of trustworthiness, not meeting standards of professional behaviour.
<b>National security vetting (NSV) and counter terrorism</b>	<ul style="list-style-type: none"> <li>▪ 6.5.5, 11, Appendix N</li> </ul>	NSV clearance refusal or counter terrorism trace of concern.

<b>Risk reason</b>	<b>APP section references</b>	<b>Covers</b>
<b>Abuse of position for sexual purpose or emotional gain</b>	<ul style="list-style-type: none"><li>▪ 6.5.14, 8.5.2, 8.5.3, 8.5.4</li></ul>	To assist monitoring following the PEEL spotlight report – ‘Shining a light on betrayal’.

## Application terminology for disproportionality monitoring



## Data dictionary

### Role types

<b>Term</b>	<b>Description</b>
Police officer	For any police officer application
Police staff	For any police staff application, excluding police community support officers. Directly employed on a contract of employment – temporary, fixed or permanent
PCSO	While considered members of staff, these roles have designated powers so are often monitored separately
Special constable	For any special constable application
Secondments	Applicants seconded from other police forces or agencies, including short-term secondments outside of the parent force, as well as regional organised crime units and other joint working arrangements
NPPV – agency staff	<p>Non-police personnel – applicants provided under a third-party agency agreement not directly employed by the force, usually fulfilling an establishment role temporarily or on a long-term basis.</p> <p>Note – This could include the Office of the Police and Crime Commissioner, the Mayor’s Office for Policing and Crime, union or Police Federation recruited resources</p>
NPPV – contractors	Non-police personnel – applicants engaged on a contract for or of service, via direct appointment, procurement or through a managed service company. Includes consultants (off-payroll working)

<b>Term</b>	<b>Description</b>
NPPV – partnership workers	Non-police personnel – applicants working with police via reciprocal agreement, not contract. Examples include council, NHS or third sector agency staff, researchers
NPPV – volunteers	Non-police personnel – applicants who provide assistance to forces without salaries, including cadet leaders
NPPV – other	<p>Non-police personnel – applicants who require vetting for access to police assets as part of their role, but not directly for a policing purpose. Examples include the following.</p> <ul style="list-style-type: none"> <li>▪ Probation staff (no access to police buildings but require vetting for access to a police-owned system)</li> <li>▪ Staff working in joint premises (not directly with police) who may require vetting for access</li> <li>▪ Search and Rescue volunteers</li> <li>▪ Individuals working within council CCTV units</li> </ul>

## Clearance types

<b>Term</b>	<b>Description</b>
RV	Police vetting clearance level – recruitment vetting
MV	Police vetting clearance level – management vetting
NPPV 1	Police vetting clearance level – non-police personnel vetting level 1
NPPV 2 abbv	Police vetting clearance level – non-police personnel vetting level 2 abbreviated
NPPV 2 full	Police vetting clearance level – non-police personnel vetting level 2 full
NPPV 3	Police vetting clearance level – non-police personnel vetting level 3
NSV – AC, CTC, Level 1B, SC, DV	National security vetting levels – accreditation check, counter terrorism check, level 1B, security check, developed vetting

## Application creation reasons

Term	Description
Renewal	This is when a previously issued clearance is due to or has expired and the same vetting level is required for the current role. This would also cover those returning from a career break whose previously issued clearance has expired prior to their return.
New application	This is to be used for any new application role type that has not been issued before.
Transferee or re-joiner	This is to be used for individuals who have previously held vetting clearance for the same role type, whether internally or with another force. This would include staff who have left and re-joined the police service.
Pre-employment check	This would be used when undertaking preliminary checks by vetting on receipt of information from the applicant or HR regarding the applicant's criminal record or financial situation.
Upgrade or downgrade	This would be used to cover any internal moves, in-post enhancement requirements or secondment requirements where a new application needs to be created to reflect the change in their vetting clearance level requirement.

## Original vetting decision outcome

Term	Description
Cleared	Full clearance has been granted with no conditions or outstanding information.
Declined	Clearance has not been granted.
Discontinued	Clearance has been discontinued but not as a result of a vetting decision.

<b>Term</b>	<b>Description</b>
	This could be the applicant withdrawing from or failure in any other part of the recruitment process.
Cleared with conditions	<p>Where full clearance has been granted, but risks have been identified and accepted that either:</p> <ul style="list-style-type: none"> <li>▪ do not meet the full requirements (such as not meeting required residency criteria yet)</li> <li>▪ require ongoing management (such as financial or system audits)</li> <li>▪ require restrictions to be put in place (such as posting conditions)</li> </ul>
Partial clearance	<p>Where sufficient checks have been satisfied to allow a start date/access while some elements of the vetting process are outstanding, which local risk practices allow.</p> <p>Having this as a cleared status rather than a pending status can provide a better picture of those who have been authorised to access police sites/systems/assets, even if full checks have not been finalised.</p>
Shared/honoured clearance	Police vetting clearance owned by the Police National Vetting Service (PNVS) or another force, recorded for information purposes only.
Withdrawal	Following a change of circumstance or adverse information, a decision has been made that the vetting clearance can no longer be held, as a result of risk that cannot be reasonably managed or mitigated, prior to the normal renewal period or on renewal.

## Appeal requested/outcomes

Term	Description
Appeal received	Clearance has not been granted but the applicant has appealed the decision, which is awaiting independent review. This would also include anywhere additional checks are being undertaken as part of the appeal.
Cleared after appeal	An application that was initially rejected but the decision has been appealed and they have now been granted full clearance with no conditions or outstanding information.
Declined after appeal	An application that was initially rejected and the applicant appealed the decision, but the original rejection still stands after the independent review.
Cleared after appeal with conditions	<p>Where full clearance has been granted but risks have been identified and accepted that either:</p> <ul style="list-style-type: none"> <li>▪ don't meet the full requirements (such as not meeting required residency criteria yet)</li> <li>▪ require ongoing management (such as financial or system audits)</li> <li>▪ require restrictions to be put in place (such as posting conditions)</li> </ul>
Appeal withdrawn	Where an appeal has been requested but does not meet the criteria threshold for an appeal review OR where an appeal has been requested but the individual subsequently withdrew their request.

## Appendix B – Annual integrity and vetting review

Public trust and confidence in the police depend on police officers and staff demonstrating and maintaining the highest level of personal and professional behaviour. Policies exist to safeguard the public, officers, staff and the police service. It is important that supervisors ensure their staff are aware of these and adhere to them.

Performing any role in the police service places restrictions on an individual that can affect their personal life. This annual integrity and vetting review is designed to ensure that every member of the police service understands and is regularly reminded of these obligations and the support available, particularly as policies and guidance change over time, as do personal circumstances.

The annual integrity and vetting review should be conducted on a one-to-one basis in a suitably private location, to allow staff to speak openly about personal matters without fear of being overheard.

You should contact the appropriate unit, in confidence, if you think any of these reminders might affect your wellbeing or integrity. Any concerns arising from this check should be submitted to the counter corruption unit via email to [insert email]. In all other cases a record should be held centrally that this review has taken place.

For further information and links to the relevant policies and procedures, please refer to the [insert intranet site].

### Code of Ethics

The **Code of Ethics** includes the ethical policing principles to support ethical decision making and guidance for everyone in policing on ethical and professional behaviour. As professionals in policing, everyone will strive to follow this guidance and meet the higher expectations placed on the policing profession.

### Standards of professional behaviour

The standards of professional behaviour are set by the conduct regulations or terms of employment for **police officers** and **police staff** respectively. These standards, if breached, may amount to misconduct and therefore may lead to

misconduct proceedings. Matters that do not meet the threshold for misconduct might be suitable to be dealt with through reflective practice.

## Reporting corruption and misconduct concerns

Anonymous reporting systems can be used to report concerns about possible corruption, misconduct or unprofessional behaviour [insert local options].

The counter corruption unit can also be contacted by email [insert email].

## Social media

The use of social media, both for professional and personal use, continues to grow. However, it is an area of significant risk for the police, both for the individual and the organisation.

- Social media must not be used to convey any operational or sensitive information.
- Your use of social media must remain professional and not bring policing into disrepute.
- Conversations on message groups such as WhatsApp, Telegram or Snapchat may be looked at as part of an investigation. Banter is not an excuse for offensive and discriminatory behaviour.
- You have a duty to immediately challenge any content published by your colleagues that is inconsistent with the standards of professional behaviour and/or to report it appropriately, for example to your line manager or counter corruption unit. Improper use, or failure to respond to it, could lead to misconduct proceedings. Criminal offences may also be committed. Please read the [insert local social media policy].

## Financial advice

If you are experiencing financial difficulties, help and support is available from [insert local options here]. Please seek advice as soon as possible, ideally before the debt becomes unmanageable.

You are required to declare bankruptcy, individual voluntary arrangements (IVA) and other financial difficulties to vetting.

You are encouraged to enlist organisational support at the earliest possible stage if experiencing financial difficulties. This is so you can be supported and any potential risk is mitigated and managed by you making such disclosures.

Any declaration will be treated sensitively and in confidence, in line with the local policy. The force vetting unit (FVU) will provide you with guidance and support.

## Gifts and gratuities

Gifts must not be accepted where they would compromise your integrity. All gifts to police officers and staff must be recorded, even if declined. This is to ensure that police officers, police staff and volunteers act and are seen to act with integrity in the conduct of their duties and responsibilities. This transparent approach will ensure decisions made are open to public scrutiny, which should enhance trust and confidence in the police service.

If you have been offered or given any gifts, discounts or hospitality during your work (excluding light refreshments), you must inform your supervisor and report it [link to local policy].

The [insert local gifts and gratuities procedure] provides more information on the process that needs to be followed. The 'GIFT' acronym should be considered whenever you are offered a gift.

- **Genuine?** Is this offer made for reasons of genuine appreciation for something I have done? Why is the offer being made? What are the circumstances? Have I solicited this offer in any way or does the donor feel obliged to make the offer?
- **Independent?** Would the offer or acceptance be seen as reasonable in the eyes of the public? Would a reasonable bystander be confident I could remain impartial and independent in all the circumstances?
- **Free?** Could I always feel free of any obligation to do something in return? How do I feel about the propriety of the offer? What are the donor's expectations of me should I accept?

- **Transparent?** Would I be comfortable if my acceptance of this offer was transparent to my force, colleagues and to the public or was reported publicly? What would be the outcome for the force if this offer was accepted or declined?

## Business interests and additional occupations

Officers and staff can hold business interests outside of the organisation. However, the public's confidence in the integrity and impartiality of the police service must not be adversely affected. Officers and staff must seek authorisation before embarking on a new business interest.

If you have any business interests or external activity, paid or unpaid, that you propose to conduct in addition to your primary role with the police service, you are required to notify your professional standards department (PSD).

Supervisors should confirm these activities have been declared in accordance with [insert local options here] and include any changes to authorised business interests previously approved. This includes staff where a member of their household is involved in running a licensed premise.

## Notifiable associations

All notifiable associations must be declared in accordance with the [insert local options here].

If you know, consider or suspect that you may have a personal association with an individual, group or organisation, which is or may be notifiable due to the relationship creating a potential conflict of interest, you must report the matter to the counter corruption unit. They will be responsible for recording the association and conducting an appropriate risk assessment to safeguard you and your family. This includes associates with previous arrests or criminal convictions, those involved in tendering or bidding for police contracts, journalists, solicitors, private investigators and officers or staff members previously dismissed from the police service. This list is not exhaustive, and you should discuss with PSD if you are unsure whether a relationship may create a conflict of interest.

The onus is on you to report any change of circumstances about the association so the matter can be reviewed.

Membership of organisations whose aims and objectives may contradict the duty of the force to promote racial, religious and social equality is incompatible with holding police vetting clearance. This includes active engagement to casual association via social media, such as 'following' or subscribing to an individual or group, or commenting, sharing and 'liking' online posts.

Examples of such organisations include National Action, Britain First, DAESH, Al Muhajiroun (ALM). This is not an exhaustive list and if you are unsure, please contact [insert force Counter Terrorism Security Advisor (CTSA)] in the first instance.

Refer to local policies in relation to:

- **notifiable associations** [insert local options here]
- **service confidence** [insert local options here]
- **proscribed terrorist groups or organisations** [insert local options here]

## Maintaining professional boundaries

You should maintain professional boundaries at all times.

You should ensure that your rank or position is not used to start sexual or improper emotional relationships with members of the public you have met through police-related work.

One of the biggest threats to policing is officers and staff who abuse their position for a sexual purpose. The abuse of position for a sexual purpose (APSP) is a form of serious corruption, defined as any behaviour by a police officer, whether on duty or off duty, that takes advantage of their position as a member of the police service to misuse their position, authority or powers to pursue a sexual or improper emotional relationship with any member of the public. This includes committing a sexual act, initiating sexual contact with, or responding to any perceived sexually motivated behaviour from another person, entering into any communication that could be perceived as sexually motivated or lewd or for any other sexual purpose.

Supervisors must discuss with their staff the need to always maintain professional boundaries.

This is an opportunity to confirm that officers and staff have a clear understanding of the [Guidance on professional boundaries](#) produced by the College of Policing. It is also an opportunity to ensure they are not using their position to start sexual or improper emotional relationships with members of the public they have met through police-related work.

## Workplace relationships

Relationships can and do exist in the workplace. However, they must remain professional at all times and not negatively impact on colleagues, service delivery or public confidence.

A power imbalance must not be used to initiate, control or maintain the personal relationship and lines of reporting must not be abused or compromised.

Where a conflict of interest exists or could be perceived to exist, it should be declared and appropriate control measures agreed with both parties' line management. This would include relationships between tutor and student, line manager and staff.

The [Guidance on appropriate personal relationships and behaviours in the workplace](#) sets out the expectations for both staff and line managers in more detail.

The potential for relationships to create an actual or apparent conflict of interest at work must be considered by the individuals involved.

Relationships or former relationships must not be allowed to impact adversely on conduct at work and thus on the ability of the service to achieve its legitimate aims.

If you think you have a relationship in the workplace that may create a conflict of interest or be perceived to create a conflict of interest, then you should consider whether you need to manage that conflict and/or declare this to your line manager.

## Harassment and bullying in the workplace

**Bullying** and harassment is behaviour that makes someone feel offended or intimidated, creating a hostile work environment whether intended or not.

Harassment is unlawful under the Equality Act 2010 and includes behaviour that is racist, misogynistic, sexist, sexualised or based on any other protected characteristic of a person.

Bullying or harassment will not be tolerated in the police service. We all have a duty to treat colleagues with respect and courtesy and to challenge and report wrongdoing.

If you are the target of bullying or harassment, or become aware that another person may be a victim of such behaviour, you should raise this at the earliest opportunity with a supervisor or PSD.

If you are a witness to harassment or bullying, you have a positive obligation to challenge or report behaviour that is unprofessional.

## Sexual harassment in the workplace

Everyone deserves to feel safe and protected in the workplace and harassment such as bullying and sexual discrimination will not be tolerated. All cases will be thoroughly investigated and dealt with robustly when identified.

Sexual harassment is defined as 'any unwelcome sexual advance, request for sexual favour, verbal or physical conduct or gesture of a sexual nature or any other behaviours of a sexual nature that might reasonably be expected to be perceived to cause offence or humiliation to another' and is a form of discrimination.

**Refer to local sexual harassment in the workplace policy** [insert local options here].

## Misuse of force systems and disclosure of information

The police service expects all use of electronic communications and information systems to conform to the highest professional standards. Information should only

be accessed or shared for a lawful policing purpose and in accordance with relevant policies and procedures. Respecting confidentiality is essential to maintain public trust and confidence. You must be able to justify why you have accessed information that is stored either manually or on any computer system.

A policing purpose is as follows:

“The prevention and detection of crime; apprehension and prosecution of offenders; protection of life and property; maintenance of law and order; also rendering assistance to the public in accordance with force policies and procedures.”

Going beyond this may lead to misconduct or criminal offences.

A non-policing purpose would be anything that falls outside of this definition, such as activities that are unlawful, designed for personal financial gain or business interest, expressly prohibited under any other force policy, casual browsing, acts of misconduct or anything that detracts from routine business.

You must not share information from the course of your work with friends and family. Your [insert local data protection policy] provides more information.

## Drugs and alcohol misuse

Misuse of alcohol or of legal or illegal drugs is a concern for policing. We recognise that this could affect anyone and those who do so are at risk of harm.

We expect all staff to be fit for duty and not do anything that could affect their safety or the safety of others. Use of drugs or misuse of alcohol can reduce your judgement and make you unfit for duty.

Officers and staff are encouraged to seek help and support from occupational health if they are aware that drugs or alcohol are affecting their wellbeing.

Refer to [insert local alcohol and drugs misuse policy] and [local alcohol and drugs testing force policy].

## Overtime and expenses

Officers and staff are encouraged to claim any overtime and expenses which they are entitled to in an accurate and timely manner. Further guidance on pay, conditions and other benefits is available from [add local details here].

## Notification of criminal offences

If you have been arrested, summonsed, convicted or received a fixed penalty notice for any offence, you need to report this to the PSD and the FVU. This includes fixed penalty points for road traffic offences.

## Change of circumstances

The Vetting Code of Practice and APP requires everyone working in a police environment to be vetted to the requisite level for the role they undertake and must maintain clearance throughout their service. Once vetting clearance is granted, it is **your** responsibility to notify the vetting unit of any relevant changes in your personal circumstances. This includes:

- change of partner, marital status or civil partnership
- change of name or address
- change of co-resident(s)
- significant changes affecting a vetting applicant or vetting clearance holder's financial status, such as a county court judgement, participation in a debt management plan or being in receipt of unexpected funds not normally received through daily activities
- being the subject of, or a person of interest in, a criminal investigation
- involvement with police, except in your policing-related role, or as a victim or witness of crime
- changes in notifiable associations
- any new associations with any individual involved in criminal activity or any person who associates with others involved in criminal activity

- involvement in or approaches by any political, religious or protest group whose aims and objectives may contradict the duty to promote racial, religious and social equality
- being the subject of civil proceedings or protective measures (see Vetting APP 3.8.4)

Failure to report relevant changes may affect your continued suitability to maintain your police vetting clearance.

### Police personnel declaration

- I confirm that I have completed and understood the elements of the annual integrity and vetting review with my supervisor.
- I know where I can find relevant guidance on the intranet with regard to the elements of the annual integrity and vetting review.
- I am aware of what is required of me by the above policies, guidance and the Code of Ethics.
- I have declared any notifiable associations or business interests.
- I understand and will update vetting on any changes in my personal circumstances at the earliest opportunity.
- I understand my obligations as a member of the police service and that I must act in accordance with the standards of professional behaviour at all times, both on and off duty.
- I am aware that I have a duty to challenge and/or report inappropriate behaviour by my colleagues.

Name

Employee number

Signature

Date

## Supervisor declaration

- I confirm that I have completed the annual integrity and vetting review with the above member of staff.
- I have reminded them of their obligations as a member of the police service and I have ensured that they fully understand what is required of them.
- I have confirmed with the member of staff that they are aware of the intranet page they can go to at any point to find information with regard to the elements of the annual integrity and vetting review.
- I am aware that I have a duty to challenge and/or report inappropriate behaviour by my staff and colleagues.

Name

Employee number

Signature

Date

## Appendix C – PND intelligence report text template for adverse recruitment or vetting information

**[Force/constabulary]** holds information relating to **[full name] [(date of birth)]**, **[previously known as [full name]]**, of last known address **[full address]**. If you are conducting checks for employment purposes, please contact **[force/constabulary] [unit holding information]** quoting reference: **[reference number]** via email to **[unit mailbox address]**.

### Example

Westershire Constabulary holds information relating to Joe Bloggs (01/01/1901), previously known as Joe Doe, of last known address Hollywood House, High Street, Chesterville, CH22 3ZZ. If you are conducting checks for employment purposes, please contact Westershire Constabulary human resources department quoting reference: LM140686 via email to [HR@westershire.police.uk](mailto:HR@westershire.police.uk).

## Appendix D – Supervisor appraisal

Office use only	
Date of issue	
Issued by	
Date returned	

A supervisor appraisal is required from you, regarding a vetting application received from a member of your staff, detailed below.

The purpose of requesting an appraisal from you is to support the wider protective security regime that supports minimising risks to policing and protects the public, in relation to those working in policing and with access to police assets and information. Your appraisal will be an assessment of the reliability and integrity of the member of staff.

It is critical that you provide an honest and accurate assessment of your member of staff's character, conduct and reliability, as well as appropriate background information to be considered during the vetting process.

We may need to make follow-up enquiries concerning information that you provide.

Please contact the force vetting manager (FVM) if you have questions relating to aspects of this form or any part of the supervisor appraisal process.

If we do not receive a response or any contact from you **within 14 days**, we will contact you and your supervisor, in case you are unavailable. This is to ensure the vetting process for the vetting applicant is not delayed unnecessarily.

### Vetting applicant details

[To be completed by the FVU]

a.	Surname	
b.	Forename(s) or personal name(s)	

c.	Date of birth	
d.	Staff number	
e.	Current role	
f.	Role to be vetted for	
g.	Current police clearance held:	
	RV <input type="checkbox"/>	NPPV 1 <input type="checkbox"/> NPPV 2 abbreviated <input type="checkbox"/>
	MV <input type="checkbox"/>	NPPV 2 full <input type="checkbox"/> NPPV 3 <input type="checkbox"/>
h.	Current police vetting application:	
	Transferee <input type="checkbox"/>	MV <input type="checkbox"/> NPPV 3 <input type="checkbox"/>
	RV – Role working closely with vulnerable individuals <input type="checkbox"/>	

## Part 1 – Contact

1.1	For what period has the vetting applicant worked under your supervision/management?	From:	To:
1.2	Please provide the date of your most recent annual integrity and vetting review with the vetting applicant.		
1.3	When is the vetting applicant's next annual integrity and vetting review due to take place?		
1.4	How much contact do you have with the vetting applicant at work?	Daily <input type="checkbox"/> Weekly <input type="checkbox"/>	

		Less frequently than weekly <input type="checkbox"/>
1.5	How well do you know the vetting applicant socially?	Well <input type="checkbox"/> Slightly <input type="checkbox"/> Not at all <input type="checkbox"/>

## Part 2 – Personal qualities

2.1	Do you have any reservations about supervising the vetting applicant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
2.2	Do you have any concerns regarding the vetting applicant's personality traits?  For example: prejudicial attitudes or discriminatory behaviours, interpersonal skills, career satisfaction, unreliability, dishonesty, indiscretion, untrustworthiness, inability to cope with pressure, recklessness.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
2.3	Do you have any concerns regarding the vetting applicant's security awareness?  For example: their attitude towards personal, physical and IT security procedures; concerns over who the vetting applicant associates with.	Yes <input type="checkbox"/>	No <input type="checkbox"/>

## Part 3 – Behaviours

3.1	Have you noticed any changes in the vetting applicant's behaviour?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
3.2	As far as you are aware, has the vetting applicant been responsible for any serious or repeated breaches of security?	Yes <input type="checkbox"/>	No <input type="checkbox"/>

3.3	Has the vetting applicant shown any evidence of association with or having unauthorised contact with any individuals, groups or organisations of criminal interest, of British or foreign origin?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
3.4	Has the vetting applicant shown any evidence of misuse of controlled or prescribed drugs?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
3.5	Has the vetting applicant shown any evidence of misuse of alcohol?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
3.6	Has the vetting applicant shown any evidence of compulsive or excessive gambling?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
3.7	Has the vetting applicant shown any evidence of unreliability, dishonesty, untrustworthiness or indiscretion?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
3.8	Has the vetting applicant shown any evidence of significant financial difficulties or unexplained affluence?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
3.9	Has the vetting applicant shown any evidence of conduct liable to lead to vulnerability or blackmail?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
3.10	Has the vetting applicant shown any evidence of health concerns, including mental health, which might cause impaired judgement?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
3.11	Do you have any concerns over the individual's attitudes, behaviours, respect and courtesy towards colleagues or members of the public?	Yes <input type="checkbox"/>	No <input type="checkbox"/>

## Part 4 – Clearance requirement

4.1	Excluding your previous answers, are you aware of any other grounds that might cast doubt on the vetting applicant's continued suitability for vetting clearance for the role they are being vetted for?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
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## Part 5 – Other enquiries

5.1	Do you have any reservations regarding the vetting applicant working with vulnerable individuals?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
5.2	Is there anything else about the vetting applicant that worries you or that could indicate a potential security concern?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
5.3	Is input from another supervisor needed to give a full and accurate appraisal?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
5.4	Is there anything that you wish to discuss personally with the vetting officer?	Yes <input type="checkbox"/>	No <input type="checkbox"/>

## Part 6 – Additional information

Where you have answered yes to any of the above questions, please provide details below, indicating the question number the details refer to.

Question number	Details

## Declaration

- I declare that the information I have given is true and complete to the best of my knowledge and belief.
- I understand that any information deliberately withheld or provided dishonestly could be investigated as a misconduct matter.

Name		Employee number	
Job title		Contact number	
Signature		Date	

Once you have completed and signed your appraisal form, please return it to the vetting department: insert [vetting@force.police.uk](mailto:vetting@force.police.uk)

## Appendix E – Transferee recruitment checklist

This checklist should be used to record that relevant information has been requested and received for transferees and those who have previously served with other forces. This information should be requested, received and reviewed prior to the confirmation of an appointment or employment.

Each force should adopt a transferee recruitment process that fits their own local procedures. A multidisciplinary approach should be taken with departments and units responsible for securing the information relevant to their particular business area. Human resources and recruitment functions should have oversight and coordination responsibility to ensure that all the necessary information is received, recorded and reviewed. Responsibility for completion of this checklist does not fall solely within the vetting function.

### Data request record

<b>HR information</b>	<b>Date requested</b>	<b>Date received</b>
Confirmation of service dates		
In-service report		
Sickness history		
Salary details		
Pensions information		
Training history		
Promotion details		

<b>Vetting information</b>	<b>Date requested</b>	<b>Date received</b>
Confirmation of vetting clearance		

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<b>Vetting information</b>	<b>Date requested</b>	<b>Date received</b>
Vetting file (if requested)		
Supervisor appraisal		

<b>Professional standards department (PSD) information*</b>	<b>Date requested</b>	<b>Date received</b>
Complaint and misconduct history		
Counter corruption intelligence		
Business interests report		
Reports on declared and managed notifiable associations		

\* Obtained through the vetting process, but should be shared with and recorded on receiving PSD system.

## Appendix F – Sensitive intelligence – good practice advice for forces

The officer responsible for agreeing the disclosure of sensitive intelligence, its format and handling instructions, should be the head of counter corruption.

When considering vetting for transferees, this advice should be used together with the standards set out in [information sharing for transferees](#).

### 1. Information held by counter corruption units

There is a presumption of transparency and full disclosure from the counter corruption unit of the parent force to the force vetting unit (FVU) of the receiving force during the entire service of the transferee applicant, unless:

- the matter has been disproved and finalised with a robust rationale to that effect
- the matter was transferred to an overt investigation on Centurion
- the officer responsible considers the intelligence to carry such risk that the intelligence cannot be disclosed\*

\*Consideration should be given to notifying the receiving force vetting manager (FVM) that 'other material is held that cannot be disclosed at this time. Please contact the officer responsible for further details'. This would allow further dialogue around any measures that could be considered to mitigate the risks of disclosure.

However, it is recognised nationally that counter corruption units record and retain material differently and on different systems and databases. It is also understood that some material may have sensitivities and/or significant risk attached so disclosure may not be possible or requires very careful management and handling.

There is a presumption in favour of disclosure of the following material:

- intelligence recorded under any of the 12 intelligence collection categories as per the Counter Corruption APP (official-sensitive) is only available to counter corruption professionals via the Knowledge Hub
- notifiable/notified associations

All disclosed material should be provided with handling instructions and provenance as per the [3-5-2 intelligence assessment matrix](#).

## 2. Decision making

When deciding whether to grant a vetting clearance on the basis of intelligence, it is worth noting the two tests used in the case of Coulson J in [2014] EWHC 216 (Admin).

1. Are there reasonable grounds for suspecting that the applicant is or has been involved in criminal activity? (Or in this case, any other activity that suggests involvement in matters that would make an individual unsuitable to hold a vetting clearance).
2. If so, is it appropriate in all the circumstances to decline or withdraw vetting clearance? For example, proportionality is the key.

In making a decision involving the disclosure of intelligence, consider the following points.

- The gravity of the allegations (more serious = greater cogency required).
- The reliability and credibility of the intelligence.
- Previous vetting decisions which may be relevant but do not set a precedent.
- If a vetting decision is based purely on untested allegations recorded in police intelligence, fairness probably requires that the allegations are put to the applicant, so they are given a chance to respond. However, this is subject to consideration of the sensitivity of the allegations and their source.
- If putting the allegations to the vetting subject would reveal a source, or threaten the privacy or wellbeing of a third party, disclosing the concerns to the applicant would probably be inappropriate.
- If necessary, the decision – and the confidentiality of the reasons for the decision – can be defended in judicial review proceedings or any other claim brought by the applicant. Forces must not be afraid to defend good quality decisions.
- In cases which involve sensitive information, decision makers should prepare a closed decision and open decision record to keep on file.

Decision makers are entitled to be risk averse as long as there are reasonable grounds for suspicion. If a vetting decision has a particularly severe consequence for the applicant, the standards of procedural fairness are elevated.

### 3. Recording a decision

When making a record of a vetting decision, the decision maker can choose to have an open and closed record. Both accounts will reflect the same decision and should be an accurate and coherent explanation of the decision made. The difference lies in protecting sensitive information as set out below.

The decision maker should be aware that a blanket refusal to disclose any reasons for the outcome will not meet basic **standards of procedural fairness and indicates a failure to engage in proportionality analysis**. While non-disclosure may be justified in particular cases because of the nature of the information or the source, it is a high threshold to refuse to provide any reasons, even in redacted or gist form.

#### 3.1. Closed decisions

A closed decision is a full explanation of the reasons for the outcome, including any sensitive information that was taken into account. This should be kept on file and made available only to people with reason to have access and cleared to the appropriate level of vetting. In this way, if the decision is challenged in court there will be a clear record of the rationale. The force can consider whether to make a public interest immunity application to protect the information.

#### 3.2. Open decisions

An open decision is a rationale given to the applicant explaining the decision taken, to the extent possible, without disclosing sensitive information. It may be a redacted version of the closed decision record or a re-statement of the decision in a gist form.

## Appendix G – NPPV level 3 annual vetting notice template

This routine but important process is required for all individuals who have been granted NPPV level 3 police vetting clearance, to maintain continued access to highly classified information and assets.

The annual vetting notice provides a formal procedural reminder for acknowledgement of your expectations as a clearance holder, to allow your NPPV level 3 vetting clearance status to be maintained.

**Failure to return this notification and signed declaration within [14 days] of receipt will be taken to mean that you no longer require NPPV level 3 police vetting clearance and your clearance will be withdrawn, revoking any previous access to police information and assets you may have had.**

Where a change of circumstances has not yet been reported, you should contact the [force] vetting unit via email [email] or phone [phone number], as soon as possible. Follow-up enquiries may take place following notification of a personal change of circumstances.

The NPPV level 3 annual vetting notice relies on your integrity. Where matters are identified that bring your integrity or behaviours into question, your suitability to maintain NPPV level 3 police vetting clearance will be reviewed.

Please contact the force vetting manager (FVM) [email/phone number] if you have any questions relating to your vetting clearance requirements or this annual vetting notice process.

### NPPV level 3 clearance holder details

[To be completed by the FVU]

a.	Surname	
b.	Forename(s) or personal name(s)	
c.	Date of birth	
d.	Vetting reference number	

e.	Occupation	
f.	Organisation	
g.	Police vetting clearance sponsor	

## Change of circumstances

The Vetting Code of Practice and Vetting APP require everyone working in a police environment to be vetted to the necessary level for the role they undertake and maintain this clearance throughout their service or contract. Once vetting clearance is granted, it is **your** responsibility to notify the [force] vetting unit of any relevant changes in your personal circumstances. This includes:

- change of partner, marital status or civil partnership
- change of name or address
- change of co-resident(s)
- significant changes affecting a vetting applicant or vetting clearance holder's financial status, such as a county court judgement, participation in a debt management plan or being in receipt of unexpected funds not normally received through daily activities
- being the subject of, or a person of interest in, a criminal investigation
- involvement with police, except in your policing-related role, or as a victim or witness of crime
- changes in notifiable associations
- any new associations with any individual involved in criminal activity or any person who associates with others involved in criminal activity
- involvement in or approaches by any political, religious or protest group whose aims and objectives may contradict the duty to promote racial, religious and social equality
- being the subject of civil proceedings or protective measures (See Vetting APP 3.8.4)

Failure to report relevant changes may affect your continued suitability to maintain your NPPV level 3 police vetting clearance.

## Declaration

- I declare my receipt and acknowledgement of this NPPV level 3 annual vetting notice.
- I confirm I have read and understood the change of circumstances requirements above.
- I confirm that I have or will make a declaration to [force] vetting unit regarding any change of circumstance I have throughout my NPPV level 3 vetting clearance period at the earliest opportunity.
- I am aware that I can contact the [force] vetting unit should I have any queries regarding matters relating to my NPPV level 3 police vetting clearance.

Name

Organisation

Signature\*

Date

\* An electronic signature can be accepted, as long as the signed electronic document is returned directly from the email account it was originally sent to by the [force] vetting unit.

## Appendix H – National digital vetting form section catalogue

This table indicates the sections required to be completed from [Appendix I – police vetting form questions and guidance](#) for the corresponding police vetting level clearance application.

	NPPV 1	NPPV 2 abbv	NPPV 2 full	RV	NPPV 3	MV
Introduction	✓	✓	✓	✓	✓	✓
1.0 Your details	✓	✓	✓	✓	✓	✓
2.0 Current partner(s)		✓*	✓	✓	✓	✓
3.0 Former partner(s)			✓	✓	✓	✓
4.0 Children			✓	✓	✓	✓
5.0 Parents			✓	✓	✓	✓
6.0 Siblings			✓	✓	✓	✓
7.0 Co-residents		✓	✓	✓	✓	✓
8.0 Security information	✓*	✓	✓	✓	✓	✓
9.0 Finances			✓	✓	✓	✓
10.0 Additional financial information					✓	✓
11.0 Contacting you	✓	✓	✓	✓	✓	✓
12.0 Declaration	✓	✓	✓	✓	✓	✓
13.0 Protected characteristics monitoring	✓	✓	✓	✓	✓	✓

\*Only part of the section requires completion.

## Appendix I – Police vetting form questions and guidance

You have been asked to complete and submit this form as you require police vetting clearance.

Police vetting clearances must be granted before an individual is appointed, employed or otherwise authorised to access police premises or information that is not in the public domain.

Police vetting clearances are valid for a limited period, require renewal after that period has elapsed and require a new vetting application form to be completed.

Your vetting application will be conducted in accordance with the College of Policing [Vetting Code of Practice](#) and vetting [authorised professional practice](#).

The information being requested allows the chief constable to fulfil a statutory obligation to run an efficient and effective force. To meet this obligation, we must ensure that individuals with access to police premises or sensitive data are trustworthy and unlikely to breach confidences. When your vetting application is processed, you may be asked to provide additional information, to help understand your particular personal circumstances.

If you do not comply with the police vetting process, clearance will be withheld and your application for appointment to the relevant role or work will be discontinued.

Should you have any questions when completing your vetting form, please contact the relevant force vetting unit (FVU) as soon as possible.

### Information and guidance

Additional information and guidance is available by clicking on [i](#). Please read all of the additional guidance to ensure your responses are as complete and accurate as possible.

### Expectations of you

You are expected to provide honest, complete and accurate information in response to all vetting enquiries. If you fail to tell us about requested information, or purposely withhold this information, this is likely to be regarded as evidence of unreliability and may reflect negatively on your honesty and integrity. This will be taken into account

when assessing your suitability to hold police vetting clearance. It may mean that your application is declined or may make you liable to disciplinary action. Where you freely disclose such material during the vetting process, potential vulnerabilities may be mitigated.

If you are unable to answer a question, as the information is unknown to you or is unobtainable, you must provide an explanation. Please note that any questions left unanswered will delay your clearance decision or could result in your application being discontinued.

If you wish to disclose sensitive information via a different communication method or you realise you have made a mistake, you should contact the relevant FVU as a matter of urgency, so that it can be considered as part of your application.

Vetting clearances can be withdrawn if it is shown that incomplete or inaccurate information was provided during the vetting process and, as a result, an investigation might ensue. For police personnel, this may involve the misconduct process.

## Changes in your circumstances after you submit this form

You must notify the relevant FVU, at the earliest opportunity, of any change of circumstances or additions to the information provided. This includes the period between submitting this form and the time you start to work for or with the police service, as well as throughout the duration of your employment, appointment or contract.

Failing to disclose the information could result in the vetting clearance being declined or reviewed, and any clearance granted could be withdrawn.

## Code of Ethics

The [Code of Ethics](#) includes guidance for everyone in policing on ethical and professional behaviour in policing and how to put ethical policing principles into day-to-day practice. As professionals in policing, everyone will strive to follow this guidance and meet the higher expectations placed on the policing profession.

## Standards of professional behaviour

The [standards of professional behaviour for police officers and special constables](#) are set by the Police (Conduct) Regulations 2020 and the [Police Staff](#)

**Standards of Professional Behaviour** are set by terms of employment and as provided in the police staff handbook. These standards, if breached, may amount to misconduct and may lead to misconduct proceedings.

## European Convention on Human Rights (ECHR)

Any interference with an individual's right to respect for private and family life under Article 8 of the European Convention on Human Rights (ECHR) and discrimination (Article 14) will only be that which is proscribed by law, necessary in a democratic society and a proportionate means of achieving a legitimate aim. Such action will include the protection of the rights and freedoms of others, safeguarding public safety, the prevention of disorder and crime and, in some cases, national security.

## Equality Act 2010 and the Gender Recognition Act 2004

You will be requested to provide information that is protected under the **Equality Act 2010** and the **Gender Recognition Act (GRA) 2004**. The police service recognises its legal obligations under the Equality Act 2010 and the GRA 2004, with particular attention paid to section 22 of the GRA 2004 regarding the sharing of 'protected information'.

The police service acknowledges the government guidelines and requirements to secure 'protected information' (section 22 of the GRA 2004) whether it is communicated verbally, materially or held electronically as required under UK law. The police service acknowledges its legitimate aim for requesting this information and its legal obligations under these requirements.

Please be assured that all information is treated in the strictest confidence and will only be used for the purposes of vetting. The disclosure of this information will be restricted to police personnel involved in the vetting process who will be required to honour that confidentiality under section 22 of the GRA 2004. Any disclosed information cannot be disclosed to any other parties without explicit written permission from the owner of the protected information.

Where you are providing details of another individual (such as partner or family members) and this discloses their gender history or trans identity, the same protections apply.

Where the applicant or other subject mentioned on this form has changed their name as part of a gender transition, the two identities will be treated as separate individuals. For example, if it is necessary to make enquiries outside of the vetting unit, the two identities will be listed separately, rather than as a previous name.

Should you have any concerns specifically regarding sharing information in relation to gender history, please contact your FVU, who can advise you further.

## General Data Protection Regulation (GDPR) and Data Protection Act (DPA) 2018

The data controller for the information collected by completion of this form is the chief constable of the police force processing your vetting application.

The personal data supplied will be managed confidentially, securely and in accordance with the GDPR and DPA 2018. It will only be accessed by those with a legitimate reason to do so.

Your personal details will not be released without your approval to any other individuals or company, except other appropriate departments in this force, other police forces and relevant government, security or foreign agencies, where required for vetting purposes.

The information you provide will be treated in confidence. However, it is not immune from disclosure and consideration in respect of relevant disciplinary or criminal matters. Where this is the case, information provided in this application may be disclosed in any subsequent investigations.

It is your responsibility to inform the individuals listed on your vetting form that their details have been provided for the purpose of your vetting application (where practical to do so).

Personal data will be retained in accordance with retention period guidance provided in the GDPR and DPA 2018, whereafter it will be disposed of securely.

Under data protection legislation, individuals have a general right of access to their personal data held by police forces, subject to certain exemptions. **For further information about how we will process your personal data, please refer to our privacy notice, which is available on the force website.**

Further information in relation to your rights and on how organisations can use your data is available from the [Information Commissioner's Office](#).

## Declined vetting clearance

You will be advised if your police vetting clearance has been declined.

Details will be provided to you, where possible, regarding the risks identified that led to this outcome, as well as your right to appeal the decision and how to initiate that process.

## National security vetting (NSV)

Police vetting is carried out by all forces and agencies of the UK police community.

NSV is a government facilitated vetting process, separate to the police vetting process. It is designed to counter different risks but complements some areas of policing risks.

Depending on your role requirements, you may be required to obtain NSV clearance from [United Kingdom Security Vetting](#) prior to appointment.

There is a degree of unavoidable duplication concerning the information you will be requested to provide. This is necessary to ensure that personal information is adequately protected and is only accessed to the extent necessary by the relevant staff in the respective FVUs and government organisations.

By continuing with this vetting application, you are confirming your acknowledgement of the general information guidance provided above.

### **The following questions are to be completed by you, the applicant.**

It is your responsibility to ensure that you complete the form honestly and accurately.

Each page must be completed before you click save and continue. It is possible to return to a previously saved page at any time.

I confirm I have read and understood the introduction and information and guidance section above

## 1. Your details

You will find that some questions provide drop-down values to choose from. These have been pre-set to assist with data uploading and reporting. However, we appreciate that you may find some lists do not contain options that are relatable to your circumstances.

Where this may be the case, we have included a free text 'Prefer to self-describe' option.

We value and wish to promote inclusiveness.

1.1	Title*	<Dr, Master, Miss, Mr, Mrs, Ms, Mx, Prefer to self-describe>
1.2	Surname/family name*	
1.3	Full forename(s)/personal name and middle name(s)*	Ensure all forenames and middle names are provided
1.4	Date of birth*	DD/MM/YYYY
1.5	Place of birth*	Town/city, county and country of birth
1.6	Sex*	<Female, male, intersex, Prefer to self-describe>
1.7	Preferred pronouns	
1.8	Any aliases, nickname(s) or abbreviated names	Including any alternative or abbreviated names you use or are known by, for example, Rob for Robert

1.9	Former or other name(s) previously known as or used	<input type="checkbox"/>
1.9.1	Surname/family name*	
1.9.2	Forename(s)/personal name and middle name(s)*	
1.9.3	Reason for former/other name*	<Adoption, alias/name known by, civil partnership, deed poll, marriage/religious marriage, name given at birth, Other>
1.9.4	Change of name from*	DD/MM/YYYY
1.9.5	Change of name to*	DD/MM/YYYY
1.10	Nationality*	
1.11	Dual nationality (if applicable)	
1.12	Driving licence number	
1.13	National insurance (NI) number	
1.14	Current occupation*	Current job role/occupation
1.15	Current employer	
1.16	Job role/position being vetted for*	Where possible, include the department, location, rank
<b>Contact details</b>		
1.17	Mobile number	
1.18	Home telephone number	

1.19	Work telephone number	
1.20	Email address*	Provide a personal email address where we can contact you with any queries regarding the information provided on your form
1.21	Please select your preferred method(s) of contact*	<Email, home, mobile, work> <b>*multi-select</b>

[UK residency pop-up guidance]

The need for UK residency periods arises from the requirement to vet all applicants in an equitable manner. At present, the UK police service does not have any means of routinely facilitating meaningful vetting enquiries overseas to the extent required for those who are resident in the UK. Meeting the minimum periods of residence in the UK allows a reasonable checkable history to account for this area of risk.

The residency requirements refer to the period immediately before an application is made.

The UK residency requirement for recruitment vetting (RV) is **three years**.

### Exceptions

If you have been living outside the UK while serving with the armed forces or on government service (this includes spouses and dependents), you are classed as being resident in the UK.

If you have been travelling overseas on a gap year, it is considered to be an extended holiday and you have therefore maintained residency in the UK.

UK residency ⓘ		
1.22	Have you continually resided in the UK within the immediate last three years?*	<No, Yes>
1.22.1	[No] Please provide details of the countries you have resided in within the last three years, including the dates from and to*	

[1.22.2 pop-up guidance]

**I do not meet the minimum residency period. What should I do?**

If your circumstances are not related to any of the exceptions, you are advised to contact your local recruitment team or vetting sponsor as soon as possible before you progress your vetting application further.

If you do not meet the minimum eligibility criteria and this has not been discussed with you personally, your vetting application will not be progressed.

1.22.2	Do any of the following reasons for not having lived in the UK for the last three years apply to you?* ⓘ	<p><b>*multi-select*</b></p> <p>&lt;I have served abroad with the British armed forces or on UK Government Service (this includes spouses and dependents)&gt;</p> <p>&lt;I have spent a year abroad as part of my UK undergraduate degree&gt;</p> <p>&lt;I have spent less than six months abroad&gt;</p>
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		<p>&lt;I have spent up to a year abroad on (extended) holiday(s)&gt;</p> <p>&lt;No&gt;</p>
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[1.23 pop-up guidance]

Even if you meet the residency criteria stated, we still need to know about any significant periods of time you have spent living abroad.

1.23	<p>Since age 10, have you spent more than 12 months continuously living outside of the UK?*</p> <p>①</p>	<No, Yes>
1.23.1	<p>[Yes] Please provide details of dates, country(ies) of residence and reason for foreign residency*</p>	

## Place(s) of residence

**Please include all addresses, including temporary or secondary addresses that you have lived at in the past five years ①**

If you do not have the postcode, you can look up any UK addresses via [Royal Mail](#).

[Place(s) of residence pop-up guidance]

This includes, but is not limited to:

- university residences
- weekday or weekend addresses
- holiday homes

- anywhere you regularly reside away from your permanent home address, in the UK or abroad

Please ensure there are no gaps in your address history.

1.24	<b>Current permanent address</b>	
	<b>Address since*</b>	MM/YYYY
	<b>Line 1*</b>	House number/house name/apartment/flat number
	<b>Line 2</b>	Street
	<b>Line 3</b>	Village/district
	<b>Town/city</b>	
	<b>County/region</b>	
	<b>Postcode*</b>	
	<b>Country</b>	

1.24.1	<b>Previous permanent address(es)</b>	
	<b>Current temporary/secondary address</b>	
	<b>Previous temporary/secondary address(es)</b>	
	<b>Address from*</b>	MM/YYYY
	<b>Address to*</b>	MM/YYYY
		If this is a secondary current address, please put today's date
	<b>Line 1*</b>	House number/house name/apartment/flat number

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	<b>Line 2</b>	Street
	<b>Line 3</b>	Village/district
	<b>Town/city</b>	
	<b>County/region</b>	
	<b>Postcode*</b>	
	<b>Country</b>	

## 2. Details about your current partner(s)

Please provide details of your current partner(s). You will also need to provide details of their parents 

[Details about your current partner(s) pop-up guidance]

### What do you mean by ‘current partner’?

Current partner(s) includes any person(s), even if you do not live together:

- whom you have a regular significant relationship with
- and/or
- whom you are intending to marry

### Why are you requesting this information?

You are being asked for your current partner(s) details due to **the potential influence and level of loyalty** you may have within your relationship. Checks are required to understand if there may be any areas that could **compromise** your or the police service’s security and reputation.

Further guidance is available on the College of Policing website, in regards to [appropriate personal relationships and behaviours](#).

### What if my relationship changes after I have submitted my vetting application?

You are expected to update the vetting unit if your relationship status changes following your vetting form submission.

### Examples of current partners that would also be expected to be provided

Relationships come in all forms and it would be difficult to provide a list to accommodate all potential circumstances. Considering **why** this information is being requested, we expect applicants to self-identify their current partner(s).

Below are examples of common undisclosed relationships that should be disclosed in this section.

- **Long distance relationships** – where a majority of communication may be electronic or via phone or video calls, but personal information is regularly shared with the other person.
- **Non-cohabiting relationships** – where individuals are in a regular, significant relationship, but do not permanently reside at the same location.
- **Private relationships** – where a relationship may not be publicly disclosed due to its nature and impact on others, professional reputation or other compromising factors.
- **Recurring physically intimate/sexual relationships** – where individuals maintain a physically intimate or sexual relationship but may not consider themselves in a serious or committed relationship. The time period of the relationship and frequency of interactions are not defined, but consideration over the potential influence or level of loyalty in the relationship should be considered for disclosure. Terms that may be used for such a relationship could be, but are not limited to: seeing someone, friends with benefits, casual sexual partner.
- **Close emotionally intimate relationships** – where individuals may have a significant emotional connection without physical intimacy. These could include life companions who may or may not reside together. This is in the context of who you would consider to be a partner, not more general friendships.
- **Common law relationships** – a common law partner is not a legally recognised term in the UK. On occasion, this term is used to describe individuals who are in a long-term relationship and cohabiting at the same address on a permanent basis but are not in a civil partnership or legal marriage in the UK.
- **Religious marriage or commitment** – where individuals are married or committed through a religious ceremony, even though it may not be legally recognised as a civil marriage in the UK, unless registered as one.

**Question:** I'm in a new relationship. Do I need to declare my new partner? ⓘ

[**Question:** I'm in a new relationship pop-up guidance]

Police vetting asks for information to help identify areas of risk relating to the clearance you are applying for or currently hold. The process does not make any judgement of you as an individual or your life.

Police vetting looks to understand how you manage family connections, associations and friendships, including who might have a significant influence on you, but only to understand if there is a risk of this influence being inappropriate.

It is acknowledged that each relationship is different and can evolve at different paces in different forms. New relationships may cease in a short time period and there may be no level of loyalty or potential influence on you as an individual during that period.

Rather than specifying a set time period of when a new partner would be expected to be disclosed, below are some potential key indicators for making a declaration to the vetting unit. These may include, but **are not limited to or exclusively**:

- recurring physically intimate/sexual relationship
- close emotionally intimate connection
- regularly residing together
- an exclusive committed relationship
- shared responsibilities (for example, financial, guardianship and/or property)
- arranged marriage or arranged to be married to
- financial dependencies in the relationship

If your relationship status changes following your initial or last vetting application, please notify your vetting unit of a change of circumstances.

2.1	Do you have a current partner or current partners?*	<No, Yes>  <b>*Does not present questions if no is selected*</b>
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2.2	Relationship to you*	<Boyfriend, civil partner, fiancé, fiancée, girlfriend, husband, partner, Prefer to self-describe, spouse, wife, other>
2.3	Relationship start date*	MM/YYYY
2.4	Partner job/occupation*	
2.5	Title*	<Dr, Master, Miss, Mr, Mrs, Ms, Mx, Prefer to self-describe>
2.6	Surname/family name*	
2.7	Full forename(s)/personal name and middle name(s)*	Ensure all forenames and middle names are provided
2.8	Date of birth*	DD/MM/YYYY
2.9	Place of birth*	Town/city, county and country of birth
2.10	Sex*	<Female, male, intersex, Prefer to self-describe>
2.11	Any aliases, nickname(s) or abbreviated names	(Including any alternative or abbreviated names you use or are known by, for example, Rob for Robert)
2.12	Former or other name(s) previously known as or used	<input type="checkbox"/>
2.12.1	Surname/family name*	
2.12.2	Forename(s)/personal name and middle name(s)*	

2.12.3	Reason for former/other name*	<Adoption, alias/name known by, civil partnership, deed poll, marriage/religious marriage, name given at birth, Other>
2.12.4	Change of name from*	DD/MM/YYYY
2.12.5	Change of name to*	DD/MM/YYYY

## Partner's place(s) of residence

**Please include all addresses, including temporary or secondary addresses, that your partner has lived at in the past five years** ⓘ

If you do not have the postcode, you can look up any UK addresses via [Royal Mail](#).

[Partner's place(s) of residence pop-up guidance]

This includes, but is not limited to:

- university residences
- weekday or weekend addresses
- holiday homes
- anywhere they regularly reside away from your permanent home address, in the UK or abroad

If the provided address history is not complete for the last five years or contains any gaps, please provide an explanation

2.13	<b>Current permanent address</b>	
	<b>Address since*</b>	MM/YYYY
	<b>Line 1*</b>	House number/house name/apartment/flat number
	<b>Line 2</b>	Street
	<b>Line 3</b>	Village/district

	<b>Town/city</b>	
	<b>County/region</b>	
	<b>Postcode*</b>	
	<b>Country</b>	
2.13.1	<b>Previous permanent address(es)</b>	
	<b>Current temporary/secondary address</b>	
	<b>Previous temporary/secondary address(es)</b>	
	<b>Address from*</b>	MM/YYYY
	<b>Address to*</b>	MM/YYYY – If this is a secondary current address, please put today's date
	<b>Line 1*</b>	House number/house name/apartment/flat number
	<b>Line 2</b>	Street
	<b>Line 3</b>	Village/district
	<b>Town/city</b>	
	<b>County/region</b>	
	<b>Postcode*</b>	
	<b>Country</b>	

## Partner's parents

**Please provide details of your partner's parents and any current partners with whom they reside**

2.14	I cannot provide the full details of a/any parent(s)	<input type="checkbox"/>
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[2.15 pop-up guidance]

If you do not know the full details, please provide as much information as you can to the best of your knowledge.

2.15	Please tick this box if they are deceased ⓘ	<input type="checkbox"/>
2.15.1	Surname/family name	
2.15.2	Full forename(s)/personal name and middle name(s)	
2.15.3	Date of birth	
2.15.4	Date of death	

2.16	Title*	<Dr, Master, Miss, Mr, Mrs, Ms, Mx, Prefer to self-describe>
2.17	Surname/family name*	
2.18	Full forename(s)/personal name and middle name(s)*	Ensure all forenames and middle names are provided
2.19	Date of birth*	DD/MM/YYYY

2.20	Place of birth*	Town/city, county and country of birth
2.21	Sex*	<Female, male, intersex, Prefer to self-describe>
2.22	Any aliases, nickname(s) or abbreviated names	Including any alternative or abbreviated names used or known by, for example, Rob for Robert
2.23	Former or other name(s) previously known as or used	<input type="checkbox"/>
2.23.1	Former surname/family name*	
2.23.2	Former forename(s)/personal name and middle name(s)*	
2.23.3	Reason for former name*	<Adoption, alias/name known by, civil partnership, deed poll, marriage/religious marriage, name given at birth, Other>
2.23.4	Change of name from*	DD/MM/YYYY
2.23.5	Change of name to*	DD/MM/YYYY

## Partner's parent(s) place of residence

### Please provide current address

If you do not have the postcode, you can look up any UK addresses via [Royal Mail](#).

2.24	<b>Current address</b>	
	<b>Address since*</b>	MM/YYYY
	<b>Line 1*</b>	House number/house name/apartment/flat number
	<b>Line 2</b>	Street

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	<b>Line 3</b>	Village/district
	<b>Town/city</b>	
	<b>County/region</b>	
	<b>Postcode*</b>	
	<b>Country</b>	

### 3. Details about your former or ex-partner(s)

Please provide the details of all other partners, covering the past three years or with whom you share children or have ongoing shared legal responsibilities



[Details about your former or ex-partner(s) pop-up guidance]

#### **What do you mean by former or ex-partner(s)?**

'All other partners' includes any person(s), even if you did not live together, whom you have had a regular significant relationship with.

You should include details of any former or ex-partner(s), covering the past three years from whom you have:

- separated
- divorced/pursuing divorce proceedings
- dissolved/in the process of dissolving a civil partnership
- legally separated or pursuing a legal separation
- ceased your religious commitment
- ceased your relationship
- ceased a close emotionally intimate relationship

Limited details will be requested if your partner has died in the last three years.

You do not have to include previous casual relationships, but you are expected to update the vetting unit if your relationship status changes.

**You also need to tell us about any person with whom you have had a child, regardless of whether you or they have legal responsibility for the child.**

#### **What are ongoing shared legal responsibilities?**

Ongoing legal responsibilities may include, but are not limited to:

- ongoing financial connections
- financial or maintenance support
- child maintenance, access or living arrangements

- mortgage, rent or household bill commitments
- joint asset ownership

### **Why are you requesting this information?**

You are being asked to provide details of any former or ex-partners covering the last three years to allow an assessment to be conducted over **the potential influence and level of loyalty** that may still exist, particularly where ongoing contact and personal involvement has continued beyond the romantic relationship due to joint responsibilities.

Academic research has identified a link between security breaches and an individual's associated loyalty or conflict of interest to family members, as well as current and former partners.

Police vetting seeks to understand if there may be any areas that could compromise your or the police service's security and reputation. Risk management activities can be explored if any concerns are identified.

Further guidance is available on the College of Policing website, in regards to [appropriate personal relationships and behaviours](#).

### **I no longer have any contact with my former/ex-partner(s). What should I do?**

If you cannot provide full details for an individual, please provide as much information as possible, including dates of birth, places of birth, known addresses and ages where possible and a reason this information may be missing.

If you have concerns over your personal safety due to domestic abuse or other concerns, please specify this. The vetting process will take this into account and consider your safeguarding needs. Many local and national charitable organisations are available to provide support. More information about domestic abuse support can be found at [Domestic abuse: how to get help – GOV.UK](#).

You are not expected to compromise yours or your family's safety to obtain information personally unknown to you.

**Please note: this section relates to a significant relationship and not your sexual history, which may include casual encounters**

3.1	Do you have any former or ex-partner(s) meeting the above criteria?*	<No, Yes>  <b>*Does not present questions if no is selected*</b>
3.2	I cannot provide the full details of a former or ex-partner	<input type="checkbox"/>
3.3	Do you have any children with this former or ex-partner?	<No, Yes>  <b>*Does not present questions if no is selected*</b>
3.3.1	Please provide the name and date of birth of the child	

## [3.4 pop-up guidance]

If your former or ex-partner has died in the last three years, you will be asked to provide basic details to assist with the vetting enquiries.

If you do not know the full details, please provide as much information as you can to the best of your knowledge.

3.4	Please tick this box if they are deceased 	<input type="checkbox"/>
3.4.1	Surname/family name	
3.4.2	Full forename(s)/personal name and middle name(s)	
3.4.3	Date of birth	DD/MM/YYYY
3.4.4	Date of death	MM/YYYY

3.4.5	Relationship to you	
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3.5	Relationship to you*	<Ex-boyfriend, ex-civil partner, ex-fiancé, ex-fiancée, ex-girlfriend, ex-husband, ex-partner, Prefer to self-describe, ex-spouse, ex-wife>
3.6	Current contact*	Please provide frequency and methods of contact, if any (for example, in regular contact via phone and meet once a week for child care arrangements)
3.7	Relationship start and end date*	MM/YYYY → MM/YYYY
3.8	Title*	<Dr, Master, Miss, Mr, Mrs, Ms, Mx, Prefer to self-describe>
3.9	Surname/family name*	
3.10	Full forename(s)/personal name and middle name(s)*	Ensure all forenames and middle names are provided
3.11	Date of birth*	DD/MM/YYYY
3.12	Place of birth*	Town/city, county and country of birth
3.13	Sex*	<Female, male, intersex, Prefer to self-describe>
3.14	Any aliases, nickname(s) or abbreviated names	Including any alternative or abbreviated names you use or are known by, for example, Rob for Robert

3.15	Former or other name(s) previously known as or used	<input type="checkbox"/>
3.15.1	Former surname/family name*	
3.15.2	Former forename(s)/personal name and middle name(s)*	
3.15.3	Reason for former name*	<Adoption, alias, civil partnership, deed poll, marriage, name given at birth, Other>
3.15.4	Date from*	DD/MM/YYYY
3.15.5	Date to*	DD/MM/YYYY

### Former/ex-partners' current or last known address

Please provide current or last known address

3.16	<b>Current or last known address</b>	
	<b>Address since*</b>	MM/YYYY
	<b>Line 1*</b>	House number/house name/apartment/flat number
	<b>Line 2</b>	Street
	<b>Line 3</b>	Village/district
	<b>Town/city</b>	
	<b>County/region</b>	
	<b>Postcode*</b>	
	<b>Country</b>	

## 4. Details about your children

Please provide details of your children and those children for whom you act as a guardian. You should include all children, regardless of age. [i](#)

[Details about your children pop-up guidance]

Please include your:

- biological children
- adopted children
- current foster children
- stepchildren
- partner’s children
- legal children/dependents
- children subject to special guardian court orders
- any other children to whom you act as legal guardian, whether or not they reside with you

If you cannot provide full details for an individual, please provide as much information as possible, including dates of birth, places of birth, known addresses and ages where possible and a reason this information may be missing.

4.1	Do you have any children meeting the above criteria?*	<No, Yes>  <b>*Does not present questions if no is selected*</b>
4.2	I cannot provide full details of my children	<input type="checkbox"/>

[4.3 pop-up guidance]

If you do not know the full details, please provide as much information as you can to the best of your knowledge.

4.3	Please tick this box if they are deceased ⓘ	<input type="checkbox"/>
4.3.1	Surname/family name	
4.3.2	Full forename(s)/personal name and middle name(s)	
4.3.4	Date of birth	
3.4.4	Date of death	
3.4.5	Relationship to you	

4.4	Relationship to you*	<Child, child of court/legal guardianship, daughter, foster child, partner's child, Prefer to self-describe, son, step-child>
4.5	Title*	<Dr, Master, Miss, Mr, Mrs, Ms, Mx, Prefer to self-describe>
4.6	Surname/family name*	
4.7	Full forename(s)/personal name and middle name(s)*	Ensure all forenames and middle names are provided
4.8	Date of birth*	DD/MM/YYYY
4.9	Place of birth*	Town/city, county and country of birth
4.10	Sex*	<Female, male, intersex, Prefer to self-describe>

4.11	Any aliases, nickname(s) or abbreviated names	Including any alternative or abbreviated names used or known by, for example, Rob for Robert
4.12	Former or other name(s) previously known as or used	<input type="checkbox"/>
4.12.1	Former surname/family name*	
4.12.2	Former forename(s)/personal name and middle name(s)*	
4.12.3	Reason for former name*	<Adoption, alias/name known by, civil partnership, deed poll, marriage/religious marriage, name given at birth, Other>
4.12.4	Change of name from*	DD/MM/YYYY
4.12.5	Change of name to*	DD/MM/YYYY

## Child's place of residence

### Please provide current address

If you do not have the postcode, you can look up any UK addresses via [Royal Mail](#).

4.13	<b>Current address</b>	
	<b>Address since*</b>	MM/YYYY
	<b>Line 1*</b>	House number/house name/apartment/flat number
	<b>Line 2</b>	Street
	<b>Line 3</b>	Village/district
	<b>Town/city</b>	

	<b>County/region</b>	
	<b>Postcode*</b>	
	<b>Country</b>	

## 5. Details about your parents

Please provide details of your parents and any current partners they have 

[Details about your parents pop-up guidance]

In the parents section, you should include details of your biological parents and any:

- adoptive parents
- step-parents
- legal parents/guardians
- individuals responsible for your upbringing
- current partners of your biological parents

If you cannot provide full details for an individual, please provide as much information as possible, including dates of birth, places of birth, known addresses and ages where possible and a reason this information may be missing.

5.1	I cannot provide the full details of a/any parent(s)	<input type="checkbox"/>
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[5.2 pop-up guidance]

If you do not know the full details, please provide as much information as you can to the best of your knowledge.

5.2	Please tick this box if they are deceased 	<input type="checkbox"/>
5.2.1	Surname/family name	
5.2.2	Full forename(s)/personal name and middle name(s)	

5.2.3	Date of birth	
5.2.4	Date of death	
5.2.5	Relationship to you	

5.3	Relationship to you*	<Father, mother, parent, parents' partner, Prefer to self-describe, step-parent>
5.4	Title*	<Dr, Master, Miss, Mr, Mrs, Ms, Mx, Prefer to self-describe>
5.5	Surname/family name*	
5.6	Full forename(s)/personal name and middle name(s)*	Ensure all forenames and middle names are provided
5.7	Date of birth*	DD/MM/YYYY
5.8	Place of birth*	Town/city, county and country of birth
5.9	Sex*	<Female, male, intersex, Prefer to self-describe>
5.10	Any aliases, nickname(s) or abbreviated names	Including any alternative or abbreviated names used or known by, for example, Rob for Robert
5.11	Former or other name(s) previously known as or used	<input type="checkbox"/>
5.11.1	Former surname/family name*	
5.11.2	Former forename(s)/personal name and middle name(s)*	

5.11.3	Reason for former name*	<Adoption, alias/name known by, civil partnership, deed poll, marriage/religious marriage, name given at birth, Other>
5.11.4	Change of name from*	DD/MM/YYYY
5.11.5	Change of name to*	DD/MM/YYYY

## Parent's place of residence

### Please provide current address

If you do not have the postcode, you can look up any UK addresses via [Royal Mail](#).

5.12	<b>Current address</b>	
	<b>Address since*</b>	MM/YYYY
	<b>Line 1*</b>	House number/house name/apartment/flat number
	<b>Line 2</b>	Street
	<b>Line 3</b>	Village/district
	<b>Town/city</b>	
	<b>County/region</b>	
	<b>Postcode*</b>	
	<b>Country</b>	

## 6. Details about your siblings

Please provide details of your siblings. ⓘ

[Details about your siblings pop-up guidance]

Please include your full, half-, step- or adopted siblings.

If you cannot provide full details for an individual, please provide as much information as possible, including dates of birth, places of birth, known addresses and ages where possible and a reason this information may be missing.

6.1	Do you have any siblings meeting the above criteria?*	<No, Yes>  <b>*Does not present questions if no is selected*</b>
6.2	I cannot provide full details of my siblings	<input type="checkbox"/>

[6.3 pop-up guidance]

If you do not know the full details, please provide as much information as you can to the best of your knowledge.

6.3	Please tick this box if they are deceased ⓘ	<input type="checkbox"/>
6.3.1	Surname/family name	
6.3.2	Full forename(s)/personal name and middle name(s)	
6.3.3	Date of birth	
6.3.4	Date of death	

6.3.5	Relationship to you	
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6.4	Relationship to you*	<Sibling, Half-sibling, Step-sibling, Adopted sibling, Foster sibling, Other, Prefer to self-describe>
6.5	Title*	<Dr, Master, Miss, Mr, Mrs, Ms, Mx, Prefer to self-describe>
6.6	Surname/family name*	
6.7	Full forename(s)/personal name and middle name(s)*	Ensure all forenames and middle names are provided
6.8	Date of birth*	DD/MM/YYYY
6.9	Place of birth*	Town/city, county and country of birth
6.10	Sex*	<Female, male, intersex, Prefer to self-describe>
6.11	Any aliases, nickname(s) or abbreviated names	Including any alternative or abbreviated names used or known by, for example, Rob for Robert
6.12	Former or other name(s) previously known as or used	<input type="checkbox"/>
6.12.1	Former surname/family name*	
6.12.2	Former forename(s)/personal name and middle name(s)*	

6.12.3	Reason for former name*	<Adoption, alias/name known by, civil partnership, deed poll, marriage/religious marriage, name given at birth, Other>
6.12.4	Change of name from*	DD/MM/YYYY
6.12.5	Change of name to*	DD/MM/YYYY

## Sibling's place of residence

### Please provide current address

If you do not have the postcode, you can look up any UK addresses via [Royal Mail](#).

6.13	<b>Current address</b>	
	<b>Address since*</b>	MM/YYYY
	<b>Line 1*</b>	House number/house name/apartment/flat number
	<b>Line 2</b>	Street
	<b>Line 3</b>	Village/district
	<b>Town/city</b>	
	<b>County/region</b>	
	<b>Postcode*</b>	
	<b>Country</b>	

## 7. Details about your co-residents

Please provide details of any individuals living at your current address, unless you have already provided their details on this form. [i](#)

[Details about your co-residents pop-up guidance]

Co-residents are individuals who reside at your current main residential address(es). This includes, but is not limited to:

- lodgers
- housemates
- property owners
- children
- other family members

**You do not need to provide details of those who live in the same hostel or section house.**

If you cannot provide full details for an individual, please provide as much information as possible, including dates of birth, places of birth, known addresses and ages where possible and a reason this information may be missing.

If you live in a house in multiple occupation (HMO), you should answer 'no' to this question and provide details in the next question.

7.1	Do you have any other co-residents meeting the above criteria?*	<No, Yes>  <b>*Does not present questions if no is selected*</b>
7.2	I cannot provide full details of my co-residents	<input type="checkbox"/>
7.3	Relationship to you*	<Fostered child, friend, housemate, lodger, Other, other relative, property owner>

7.4	Title*	<Dr, Master, Miss, Mr, Mrs, Ms, Mx, Prefer to self-describe>
7.5	Surname/family name*	
7.6	Full forename(s)/personal name and middle name(s)*	Ensure all forenames and middle names are provided
7.7	Date of birth*	DD/MM/YYYY
7.8	Place of birth*	Town/city, county and country of birth
7.9	Sex*	<Female, male, intersex, Prefer to self-describe>
7.10	Any aliases, nickname(s) or abbreviated names	Including any alternative or abbreviated names used or known by, for example, Rob for Robert
7.11	Former or other name(s) previously known as or used	<input type="checkbox"/>
7.11.1	Former surname/family name*	
7.11.2	Former forename(s)/personal name and middle name(s)*	
7.11.3	Reason for former name*	<Adoption, alias/name known by, civil partnership, deed poll, marriage/religious marriage, name given at birth, Other>
7.11.4	Change of name from*	DD/MM/YYYY
7.11.5	Change of name to*	DD/MM/YYYY

[7.12 HMO pop-up guidance]

**Houses in multiple occupation (HMO):** you will live in an HMO if at least three different tenants live there, forming more than one household, and you share toilet, bathroom or kitchen facilities with other tenants. An HMO can create multiple variations of relationships with the other tenants. Due to this, we are unable to specify in which circumstances you would be required to include them as co-residents. Please answer the below questions as fully as you can. The information you provide will be assessed by the relevant force vetting unit and, if necessary, you may be contacted to provide further details.

7.12	Do you live in a house in multiple occupation (HMO?)* 	<No, Yes> <b>*Does not present questions if no is selected*</b>
7.12.1	If yes, how many people live in the house with you?*	
7.13	What spaces do you share (for example, kitchen, bathroom, lounge/sitting area)?*	
7.14	Do you have a locked door to your personal space that no other occupants have a key to?*	<No, Yes>
7.15	Does this door remain locked at all times when you are not at home, no matter the length of time you are away?*	<No, Yes>

7.16	Please provide the details you know about each of the other occupants	
7.16.1	Occupant number*	<Occupant 1, Occupant 2, Occupant 3, Occupant 4, Occupant 5, Occupant 6, Occupant 7, Occupant 8, Occupant 9, Occupant 10, Occupant 11, Occupant 12>
7.16.2	Name*	
7.16.3	Date of birth	
7.16.4	Address since	MM/YYYY
7.16.5	How would you describe your relationship with the other occupants?*	<We are friends and socialise together, We interact within the house (for instance sharing a meal) but do not spend any other time together, We have little interaction except for basic greetings and necessary communication>
7.17	Do you have any concerns about other occupants knowing that you are working for or with police?*	<No, Yes> <b>*Does not present questions if no is selected*</b>
7.17.1	If yes, please provide details*	

## 8. Security information

### Please read this section very carefully

It is **your responsibility** to ensure that you complete this form honestly and accurately.

This section will ask a range of questions relating to your own personal security.

Questions will cover the following areas:

- employment matters
  - previous vetting
  - misconduct or disciplinary proceedings
  - previous/current government employment
- police history
  - investigations
  - arrests
  - convictions, cautions and other disposals
- notifiable associations
- internet and social media usage
- politics and extremism
- any other circumstances

Pop-up guidance is available where you see this symbol 

If you are unsure whether you should include something, you can either contact the relevant FVU for advice or include the information. Disclosing information will not necessarily have a negative impact on your application, but failure to disclose something relevant may bring into question your honesty and integrity, which could lead to vetting clearance being declined.

I confirm I have read and understood the security information section above

## Employment matters

### Previous vetting

[Previous vetting pop-up guidance]

There are different types of government vetting procedures that are designed to assess risks specific to their area of concern.

**BPSS (baseline personnel security standard) checks** are pre-employment controls undertaken by an employer to verify the identity of the individual and ensure they have a right to work. BPSS underpins other vetting processes, providing the reassurance that the checks being undertaken are on the correct details.

A **DBS (Disclosure and Barring Service) check** allows employers to check the criminal record of someone applying for a role. The criteria can be more detailed for certain roles, for example in healthcare or childcare.

**National security vetting (NSV)** is intended to assure government bodies that the individual has not been involved in espionage, terrorism, sabotage or actions intended to overthrow or undermine parliamentary democracy by political, industrial or violent means.

Different levels of NSV include:

- CTC (counter terrorism check)
- SC (security check)
- DV (developed vetting)
- AC (accreditation check)
- Level 1A
- Level 1B

The level required is determined by the nature of the role you are undertaking.

Clearances are granted through [United Kingdom Security Vetting](#).

**Police vetting** has been developed to allow the police service to identify, assess and manage risks relating, but not limited to:

- protection of police assets
- national security
- public safety
- public confidence
- protection of organisational assets
- operational safety
- leadership
- corruption and coercion
- integrity

Different levels of police vetting include:

- RV (recruitment vetting)
- MV (management vetting)
- NPPV 1 (non-police personnel vetting level 1)
- NPPV 2 abbreviated (non-police personnel vetting level 2 abbreviated)
- NPPV 2 full (non-police personnel vetting level 2 full)
- NPPV 3 (non-police personnel vetting level 3)

8.1	Have you been the subject of a vetting procedure before?*	<No, Yes>
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[8.1.1 pop-up guidance]

Please provide details of the type of vetting, dates of validity, the organisation this was carried out for and the reason for the vetting

8.1.1	[Yes] Please provide details of any other vetting process(es) you have been the subject of*	
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8.1.2	Have you ever had any vetting clearance declined/refused/withdrawn or revoked?*	<No, Yes>
8.1.2.1	[Yes] Please provide details including the organisation, date and reason (if known)	

## Misconduct or disciplinary proceedings and dismissal

[8.2 pop-up guidance]

Any previous misconduct or disciplinary processes in the workplace require an assessment of your suitability to hold a level of police vetting.

Misconduct is unacceptable or improper behaviour by an employee or professional person.

Disciplinary proceedings are a formal process for dealing with perceived misconduct. Proceedings include letters from your employer, investigations, meetings or hearings.

You should include any misconduct or disciplinary processes you are or have been subject to, even if:

- it was resolved in your favour
- you did not receive a sanction
- you resigned/retired prior to the conclusion of the proceedings
- you were dismissed from your employment
- you were dismissed during a probationary period, for example under Regulation 13 of the Police Regulations 2003

8.2	Whether as a paid employee or as a volunteer in any employment or organisation, have you ever been subject to or are you currently subject to	<No, Yes>
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	a misconduct or disciplinary process, or have been dismissed?* ⓘ	
8.2.1	[Yes] Please include the organisation, date and reason	

[8.3 pop-up guidance]

Some professions require qualified individuals to register with a regulator once they have fully qualified. This allows the public to verify their professional status. For example:

- a doctor’s professional registration is regulated by the General Medical Council (GMC)
- a school teacher’s professional registration is regulated by the Teaching Regulation Agency (TRA)
- a paramedic’s professional registration is regulated by the Health and Care Professional Council (HCPC)

Following a disciplinary hearing:

- the GMC may suspend a doctor from practising medicine for 12 months
- a teacher may be prohibited from teaching indefinitely following a misconduct panel meeting
- the HCPC may strike off a paramedic from their register

8.3	Have you ever been removed, suspended or ‘struck off’ a professional register following a disciplinary?* ⓘ	<No, Yes>
8.3.1	[Yes] Please provide details including incident or offence, sentencing authority and dates	

## Previous/current government employment

[Previous/current government employment pop-up guidance]

Government employment refers to any work for any UK or foreign service, force or agency.

The term 'work' means paid, unpaid, voluntary, temporary, agency, cadets, part time, full time, reservist, member of, or similar

8.4	Are you currently working or have you previously worked for the Prison Service or a government agency?*	<No, Yes>
8.4.1	[Yes] Please provide details, including name of the organisation, job title/rank, dates served, employee/service number for each instance – including any current role or reason for leaving	
8.5	Are you currently working or have you previously worked for a police service?*	<No, Yes>
8.5.1	[Yes] Please provide details, including name of the organisation, job title/rank, dates served, employee/service number for each instance – including any current role or reason for leaving	

8.5.2	Are you currently on the police barred list?	<No, Yes>
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[8.6 pop-up guidance]

Armed forces includes any country's navy, army or air force – or similar in other countries.

8.6	Are you currently working or have you previously worked for the armed forces?* 	<No, Yes>
8.6.1	[Yes] Please provide details, including name of the organisation, job title/rank, dates served, employee/service number for each instance – including any current role or reason for leaving	
8.6.2	Have you ever been convicted by a court martial, or sentenced to detention or dismissal or fined while serving in the armed service of the UK or any Commonwealth or foreign country?	<No, Yes>
8.6.2.1	[Yes] Please provide details, including incident or offence, sentence or punishment, sentencing authority and dates	

## Police history

When we ask 'have you ever', this refers to:

- any situations related to you as an adult or juvenile/youth – during your lifetime
- by any UK or non-UK police force, law enforcement agency or any other statutory prosecuting authority or agency – in any country
- including involvement with military authorities

In addition to cautions and convictions, you are required to disclose matters such as being arrested or subject to voluntary interview, even if no further action was taken.

Disclosing information will not necessarily have a negative impact on your application, but failure to disclose something relevant may bring into question your honesty and integrity, which could lead to vetting clearance being declined.

Should you have any questions when completing your vetting form, please contact the relevant force vetting unit as soon as possible.

You **should not** conduct or request any checks on police systems to verify or obtain information held in relation to your vetting form. You can ask for information held about yourself from both the ACRO Criminal Records Office (ACRO) and a local police force depending on what information you're looking for.

This is referred to as a subject access request and your local force website contains details on how to initiate this. Both services are free.

- You can ask ACRO for information held on the Police National Computer (PNC) which includes details of arrests, cautions and convictions.
- You can ask police forces for any other information they hold on you.

**Note:** To request information about an incident, you must apply to the police force where the incident took place. This might mean that you have to apply to more than one police force.

## Investigations ⓘ

[Investigations pop-up guidance]

This information is being asked for to ensure the police service can effectively identify and assess any risks associated to your application. It is an opportunity for you to demonstrate your honesty and integrity.

This section also covers investigations regarding financial matters (HM Revenue & Customs (HMRC)) or Department for Work and Pensions (DWP) immigration matters, and whether you have been summonsed to attend court for an offence.

It is not expected that you include details of any investigations that you were involved in within your normal course of work duties.

### **What does it mean to be a subject of an investigation?**

Where it has been alleged or you have been accused/suspected to have undertaken activities or behaviours that could result in a criminal or agency investigation.

For example:

- it was alleged to the police that you have committed a domestic assault
- someone may have accused you of stealing their vehicle
- you could be a suspect in an Environment Agency investigation for having breached an aspect of environmental law, such as fly tipping

Civil investigations may include:

- being issued with a non-molestation order by a family court
- HMRC launching an investigation into your potential tax evasion

If you are currently under investigation for an offence, including being on police bail, your vetting application will be discontinued. You may submit a new vetting application once the matter is finalised.

8.7	Are you currently, or have you ever been, the subject of any arrest, voluntary interview, criminal or civil investigation, regardless of the outcome?*	<No, Yes>
8.7.1	[Yes] Please provide details, including dates, the incident or offence, the court or police station and the outcome	

### Charges, orders, court action and harassment warnings

8.8	Have you ever been charged with an offence?*	<No, Yes>
8.8.1	[Yes] Please provide details including the offence(s), date and outcome	

#### [8.9 pop-up guidance]

This could include, but is not limited to the following.

- Domestic violence protection notice (DVPN) or order
- Female genital mutilation (FGM) protection order
- Forced marriage protection order
- Non-molestation order
- Restraining order
- Occupation order
- Sexual harm prevention order or sexual risk order
- Stalking protection order
- Slavery and trafficking prevention and risk order

- Violent offender order
- Anti-social behaviour order or contract
- Football spectator banning order

8.9	Have you ever been served with a civil injunction or protection order?* 	<No, Yes>
8.9.1	[Yes] Please provide details including the type, dates and reason	

## Convictions and cautions

Having convictions and cautions does not necessarily mean your vetting will be declined. But if you fail to declare any of these matters, it may bring into question your honesty and integrity, which could lead to vetting clearance being declined.

If you are applying for a **police staff** role or **NPPV** clearance, you may not need to provide previous conviction or caution details.

Please review this pop-up guidance to see whether, under the [Rehabilitation of Offenders Act 1974 \(Exceptions\) Order 1975 \(2013 and 2020\)](#), you are not required to provide details for any previous offences you may have committed. 

[Convictions and cautions pop-up guidance]

### **Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (2013 and 2020)**

The above Exceptions Order introduced **protected convictions and cautions** and distinguishes between the treatment of the roles of police officers and police staff.

**Police officer and special constable applicants** are exempt from the Rehabilitation of Offenders Act 1974 and are required to disclose **all** convictions and cautions, **with no exceptions**.

**Police staff and non-police personnel applicants:** The table below provides the criteria for protected convictions and cautions. If you have any previous convictions or cautions which are protected, you **do not have to disclose them on this vetting form**.

You do still have to declare previous convictions and cautions which, under the Rehabilitation of Offenders Act 1974, would ordinarily be considered as 'spent' but are not protected.

The government website provides guidance on [rehabilitation periods](#), but if you are unsure whether or not to declare any matters, please contact the relevant FVU for guidance or include the details for an assessment to be made at the point of vetting.

Protected convictions		Protected cautions	
These <b>do not</b> have to be declared by police staff applicants and non-police personnel applicants			
A conviction is considered to be 'protected' if <b>all</b> the following criteria apply:		A caution is considered to be 'protected' if <b>all</b> the following criteria apply:	
It is not for a listed offence* under section 2A(5) of the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975			<b>Aged under 18 at the time</b>  Immediately protected
No custodial sentence was imposed		<b>Aged 18 or older at the time</b>  Six years or more have passed since the caution	
<b>Aged 18 or older at the time</b>  11 years or more have passed since the conviction	<b>Aged under 18 at the time</b>  Five years and six months or more have passed since the conviction		

\***Listed offences** include serious, violent and sexual offences, and offences that are of specific relevance to the safeguarding of children and vulnerable adults. These can be found at [List of offences that will never be filtered from a DBS certificate \(GOV.UK\)](#)

[8.10 pop-up guidance]

### Community resolution

Community resolutions provide an opportunity for the police to deal with appropriate low-level offences and offenders without recourse to formal criminal justice sanctions. This could include a simple apology, an offer of compensation or a promise to clear up any graffiti or criminal damage as examples.

Community resolutions do not form part of your criminal record, but a record will have been made on local systems.

Different types of community resolution include:

- restorative justice meeting or conference
- reparation
- victim awareness session

### **Youth or adult restorative disposal (YRD/ARD)**

A restorative disposal may be used to repair the damage the crime has done to the victim and community.

Restorative disposals do not form part of your criminal record, but a record will have been made on local systems.

**Formal warning** by police (for example, cannabis possession, harassment or verbal)

Police warnings have previously been used as non-statutory disposals for first-time offences as part of a three-stage escalation procedure. The warning may have only been given to you verbally.

Formal warnings do not form part of your criminal record, but a record will have been made on local systems.

### **Penalty notice for disorder (PND)**

PNDs are issued with payment penalties and are given for offences such as:

- shoplifting
- possessing cannabis
- being drunk and disorderly in public

PNDs do not form part of your criminal record, but recordable offences will be added to the PNC.

**Youth caution (including reprimands and final warnings)**

A youth caution is a formal out-of-court disposal, intended to provide a proportionate and effective response to youth offending behaviour.

This would be considered a criminal record, although under the Rehabilitation of Offenders Act 1974, it will become immediately 'spent'.

These replaced reprimands and final warnings disposals in 2013.

**Simple caution**

A simple caution is a formal out-of-court disposal, designed to provide a means of dealing with low-level, mainly first-time, offending without a prosecution.

This would be considered a criminal record, although under the Rehabilitation of Offenders Act 1974, it will become immediately 'spent'.

**Conditional caution**

A conditional caution is a formal out-of-court disposal, with certain rules or restrictions.

This would be considered a criminal record, although under the Rehabilitation of Offenders Act 1974, it will become 'spent' three months after the date it was given.

Examples of conditions include:

- attending treatment for drug abuse
- fixing damage to a property

8.10	<p>Have you ever been issued any of the following crime/out-of-court disposals?* <a href="#">i</a></p> <ul style="list-style-type: none"> <li>▪ Community resolution</li> <li>▪ Youth or adult restorative disposal (YRD/ARD)</li> </ul>	<No, Yes>
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	<ul style="list-style-type: none"> <li>▪ Formal warning, for example, cannabis possession, harassment or verbal</li> <li>▪ Penalty notice for disorder (PND)</li> <li>▪ Youth caution (including reprimands and final warnings)</li> <li>▪ Simple caution</li> <li>▪ Conditional caution</li> </ul>	
8.10.1	[Yes] Please provide details, including the offence, date and outcome	

## [8.11 pop-up guidance]

This includes crimes related to benefit fraud, any discharge convictions or bind over orders, for example:

- an absolute discharge (becomes 'spent' straight away)
- a conditional discharge, where you could still get a sentence if you break the conditions (becomes 'spent' either on the date it ends or two years after it was given)
- a bind over order, where you could get a fine if you break the conditions (becomes 'spent' either on the date it ends or two years after it was given)

8.11	Have you ever been convicted of any offence?* 	<No, Yes>
8.11.1	[Yes] Please provide details, including the offence, date and outcome	

[8.12 pop-up guidance]

This does not include parking notices or where you have completed a speed or driver awareness course as an outcome of an offence

8.12	Have you ever committed traffic offences, including any that you received a fixed penalty notice (FPN) for?* <a href="#">i</a>	<No, Yes>
8.12.1	[Yes] Please provide details, including the offence, date and outcome	

### Notifiable associations [i](#)

In this context, associating with another person is:

- having an acquaintance, friendship, relationship, intimacy or connection (this would include simply knowing another person even if you have no contact with them)
- meeting or uniting for a common purpose
- keeping company or being familiar
- being an ally, confederate, partner or colleague
- being a member of a group, organisation or society that is formed for the promotion of a common object or objects

An association would include communicating via phone, social media and other forms of communication, not just in person.

If you answer 'Yes' to any of the following questions, please provide as much information as you can, even if you have provided some details on your form already.

Information for each person should include:

- their name, address and date of birth
- the reason you are declaring them and what you know
- your relationship to them
- your frequency and type of contact with them

[Notifiable associations pop-up guidance]

### **Notifiable association policy**

Every police force has a local notifiable association policy. The purpose of this policy is to support individuals disclosing relationships that could compromise their work, safety or reputation, as well as that of the police service.

The notifiable association policy allows individuals to demonstrate their openness and integrity. A disclosure will allow any potential risks to be assessed, ensuring relevant advice and support can be provided to an individual, where risks can be effectively managed.

### **Why do I have to provide this information on my vetting form?**

This information is being requested as part of the vetting process, allowing the vetting unit to assess your circumstances as a whole.

They may seek further clarification over your relationship, ensuring they have the right information to make an assessment. They may also provide you with advice on how to manage any notifiable associations, should you ever feel compromised at work.

The vetting process must assess any potential risk factors of your associations that could lead to potential compromise, corruption, coercion, vulnerability, adverse pressure or influence, conflict of interest or reputational damage.

### **What do you mean by compromise?**

Being compromised can come in many forms, such as the following.

- You ignore the criminal behaviour of your association to protect them, to maintain your relationship with them or to benefit from their criminal behaviour
- You access police information out of personal interest

- You share police information, breaching the Data Protection Act (DPA) 2018
- You accept cash, benefits, gifts or bribes to look up or share police information
- You fail to provide a truthful and accurate account, in favour of your associate
- You discuss police tactics, whether intentionally or unintentionally, which could affect the safety and service to the public
- Your association could damage the reputation or reduce public confidence in the police service

Due to the DPA 2018, we are unable to discuss any information regarding your associations that you are not already aware of, or that is not in the public domain.

Declaring an association and your knowledge of their criminal activities is likely to reduce risks, as it allows open conversations and tailored advice to be given to you. If you do not inform us of your associates' criminal activities, the level of risk may be increased, as we will be unable to provide specific advice to help you manage any identified risks.

Failure to disclose knowledge of associates' criminal activities, where it is reasonably believed you are aware of their offending, may cause your integrity to be questioned and could result in your vetting clearance being declined.

**Do not carry out checks or request any checks to be carried out on police systems to obtain this information for your vetting form.**

8.13	<p>Do you know or associate with any person(s), including any relatives, who you know or have reason to believe is:*</p> <ul style="list-style-type: none"> <li>▪ a person with criminal convictions</li> <li>▪ a person engaged in criminal activities</li> <li>▪ a person who has engaged in criminal activities</li> </ul>	<No, Yes>
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	<ul style="list-style-type: none"> <li>▪ a person who has previously or does associate regularly with criminals ⓘ</li> </ul>	
8.13.1	[Yes] Please provide all details known such as: their name, address, date of birth, the reason you are declaring them and what you know, your relationship to them and your frequency and type of contact with them	
8.14	Do you know or associate with any person(s), including any relatives, who you know or have reason to believe has ever been a member of, had any contact with or supported any groups or actions that could be described as politically, religiously, racially or environmentally extreme?*	<No, Yes>
8.14.1	[Yes] Please provide all details known such as: their name, address, date of birth, the reason you are declaring them and what you know, your relationship to them and your frequency and type of contact with them	
8.15	Do you know or associate with any person(s), including any relatives, where the relationship could cause a conflict of interest or reputational damage if not disclosed? (for example, private investigators,	<No, Yes>

	journalists, defence legal teams or those involved in tendering or bidding for police contracts)	
8.15.1	[Yes] Please provide all details known such as: their name, address, date of birth, the reason you are declaring them, employment details, your relationship to them and your frequency and type of contact with them	

[8.16 pop-up guidance]

This could include private investigators or associates who work with legal firms

8.16	Do you know or associate with any person(s), including any relatives, who have previously worked for the police service or other law enforcement agency, but now work in an investigative role? ⓘ	<No, Yes>
8.16.1	[Yes] Please provide all details known such as: their name, address, date of birth, the reason you are declaring them, employment details, your relationship to them and your frequency and type of contact with them	
8.17	Do you know or associate with any person(s), including any relatives, who have been dismissed from the	<No, Yes>

	police service or other law enforcement agency?*	
8.17.1	[Yes] Please provide all details known such as: their name, address, date of birth, the reason you are declaring them and what you know, your relationship to them and your frequency and type of contact with them	

## Your internet and social media usage

[Your internet and social media usage pop-up guidance]

Open source information is information that is freely and publicly accessible across the internet.

Open source enquiries assist with risk identification, particularly those that would indicate a vetting applicant is unsuitable to work in policing. It additionally can protect the vetting applicant's personal details and highlight potential vulnerabilities, such as poor security awareness or inappropriate self-representation.

When carrying out open source research, we do so from the point of view of a member of the public or a journalist and only look at information that is publicly available. Therefore, it is in your interest to declare this information so we can assist with identifying any potential risk to you or the police service.

We will check content on publicly available social media sites.

You must provide full details for ALL social media accounts, whether you actively use them or not.

Social media accounts include, but are not limited to:

- Facebook
- Instagram

- X (formerly known as Twitter)
- LinkedIn
- OnlyFans
- TikTok
- YouTube
- online forums

We expect the following statements to be true. Any conflicting content found will raise concerns over your suitability to hold police vetting clearance.

- I use social media responsibly and safely
- I have not published anything that could reasonably be perceived by the public or by policing colleagues to be discriminatory, abusive, oppressive, harassing, bullying, victimising, offensive or otherwise incompatible with policing principles
- I have not published, or offered to publish, any material that might undermine my reputation or that of the policing profession or might run the risk of damaging public confidence in the police service

Most people use the internet and social media regularly and routinely for all sorts of reasons, including: recreation, shopping, education, professional and personal development, and communicating with family, friends and sometimes much wider communities of interest.

The vetting process therefore needs to take proper and appropriate account of online activities to be assured that you:

- use social media responsibly and safely
- have not published anything that could reasonably be perceived by the public or by policing colleagues to be discriminatory, abusive, oppressive, harassing, bullying, victimising, offensive or otherwise incompatible with policing principles
- have not published, or offered to publish, any material that might undermine your reputation or that of the policing profession or might run the risk of damaging public confidence in the police service

8.18	Please provide all email addresses associated to you*	
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[8.19 pop-up guidance]

### What if I do not provide my social media account details?

If you do not provide us with your social media account details, the police vetting process is still required to undertake open source and social media site checks. Your refusal to provide details of social media accounts associated to you may cause your integrity to be questioned.

8.19	Do you have any social media accounts?* <a href="#">i</a>	<No, Yes>
8.19.1	[Yes] Please provide the web address of your profile page (URL), your username, handle, unique ID or identifier and the name displayed <b>for each site or application</b>	
8.20	Do you have a blog or website, either personal or business related?*	<No, Yes>
8.20.1	[Yes] Please provide details, including the web address (URL) and the nature of the content	
8.21	Do you administer any websites for personal or business use?*(For groups, clubs, forums, businesses)	<No, Yes>

8.21.1	[Yes] Please provide details, including the web address (URL) and the nature of the content	
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[8.22 pop-up guidance]

This may include material that might reasonably be considered discriminatory, abusive, oppressive, harassing, bullying, victimising, offensive or otherwise incompatible with policing principles

8.22	Have you ever posted online or elsewhere, or offered for publication, any material that might undermine your own reputation or that of the policing profession or might run the risk of damaging public trust and confidence in the police service?*	<No, Yes>
8.22.1	[Yes] Please provide details, including the web address (URL) and the nature of the content	

[8.23 pop-up guidance]

An assessment needs to be undertaken to determine whether there is any online content directly associated to you that could damage your personal reputation, the reputation of the police service, reduce the trust and confidence the public has in the police service or compromise your or the police service's security.

8.23	<p>Are you aware of any other information, photos, web content or other media on the internet about you that could be compromising?*</p> <p>Either something you have posted yourself or that has been posted by anyone else <a href="#">i</a></p>	<No, Yes>
8.23.1	<p>[Yes] Please provide details, including the web address (URL) and the nature of the content</p>	

## Politics and extremism [i](#)

[Politics and extremism pop-up guidance]

Police officers should abstain from any activity which is likely to interfere with the impartial discharge of their duties or which is likely to give rise to the impression among members of the public that it may so interfere.

If you currently participate in any political campaigning, you will need to stop your participation upon appointment. Political campaigning includes:

- persuading others how to vote
- actively working for a party or candidate
- attending political meetings or rallies
- contributing money to a party or candidate
- participating in a political club

The police service strictly prohibits any officers or staff from being or becoming members of organisations whose aims and objectives may contradict the duty to promote racial, religious and social equality. If you are, or have been, a member of such an organisation you are not eligible for vetting clearance.

Membership of a proscribed organisation, or other group or association that has aims and objectives that are contrary to the standards of professional behaviour, will ordinarily result in vetting clearance being declined.

This includes active engagement to casual association via social media, such as 'following' or subscribing to an individual or group, or commenting, sharing and 'liking' online posts.

[8.24 pop-up guidance]

Details of [proscribed terrorist groups or organisations](#) can be found on the government website.

8.24	Are you a member of or have you ever been involved with a proscribed terrorist organisation or group?* ⓘ	<No, Yes>
8.24.1	[Yes] Please provide details	
8.25	Have you ever been involved in any groups or actions that could be described as politically, religiously, racially or environmentally extreme?*	<No, Yes>
8.25.1	[Yes] Please provide details	

### Any other circumstances ⓘ

[Any other circumstances pop-up guidance]

The security questions provide you with an opportunity to disclose any commonly known risk factors on your vetting submission.

We understand individuals may have unique circumstances that may not be covered by your previous answers. This question allows you to bring to our attention anything else that may affect your vetting clearance.

This includes circumstances or characteristics that may:

- concern your past, your integrity or your associations
- affect your performance in your role
- make you vulnerable to pressure or improper influence

Examples could include, but are not limited to:

- use of controlled drugs, non-prescribed steroids or misuse of prescription drugs
- serious financial difficulties
- compulsive or excessive gambling
- addictions or dependencies
- conduct that could make you susceptible to pressure or improper influence by anyone
- use of sex workers
- relevant medical issues\*

\*Vetting staff are not qualified to assess medical conditions. Any medical information, such as serious medical or psychological concerns or welfare matters, revealed as part of the vetting process, must be passed to the force medical officer.

If a medical issue is relevant, detailed medical information is not required for the vetting process. You are encouraged to provide this information directly to the force medical officer or occupational health unit, so they can undertake a full professional assessment.

**If in doubt, please include the information.**

8.26	Is there anything else that you should bring to the attention of the vetting unit, which may impact negatively on your vetting clearance?*	<No, Yes>
8.26.1	[Yes] Please provide details	

## 9. Your financial circumstances

Members of the police service are in a privileged position with regards access to information and could be considered potentially vulnerable to corruption. You should therefore not be under pressure from undischarged debts or liabilities and should be able to manage loans and debts sensibly.

Most applicants have debts, such as mortgages, undischarged student or other loans and credit/store card debts. Debts that are within your means and manageable are not a barrier to police vetting clearance.

**You may wish to carry out your own credit check prior to completing this section, so you are fully aware of your current and recent financial history registered to your details.**

Depending on your specific circumstances, it is unlikely that police vetting clearance will be granted if you have:

- an outstanding county court judgment (CCJ)
- been registered bankrupt and three years have not passed since the date your bankruptcy was discharged
- been granted a debt relief order (DRO) and three years have not passed since the date it was finalised

All questions relate to you, as the applicant only. The questions do not just relate to your presence in the UK; they equally apply to your presence worldwide. For example, through residency, as a visitor, or through another association overseas.

A check will be conducted with an external credit reference agency and the results will be compared with the information you provide.

If you have declared a financial matter, please ensure you provide any supporting documentation as evidence.

Failure to disclose honest and accurate information may result in your application being declined.

Pop-up guidance is available where you see this symbol 

It is your responsibility to ensure that you complete the questions honestly and accurately.

If you are unsure whether you should include something, you can either contact the relevant FVU for advice or include the information. Disclosing information will not necessarily have a negative impact on your application, but failure to disclose something relevant may bring into question your honesty and integrity, which could lead to vetting clearance being declined.

I confirm I have read and understood the 'Your financial circumstances' section above

## Your financial circumstances

**Unless otherwise stated, complete these questions in respect of the last six years**

9.1	Have you ever been listed as the director of a company?*	<No, Yes>
(Whether or not this is existing or has been dissolved)		
9.1.1	[Yes] Please provide details	

[9.2 pop-up guidance]

We are asking this question as we are aware private informal lending can often take place for a number of reasons.

This information will assist in understanding your financial circumstances and arrangements better. Where necessary, supportive advice can be given to help manage your financial situation or any undue pressure you might experience relating to your financial security and vulnerability.

9.2	Do you owe any family members, friends and/or associates any sum of money over £1,000? ⓘ	<No, Yes>
9.2.1	[Yes] Please provide details, including details of who has lent you the money, the amount, the reason(s) and plans to repay the funds	

[9.3 pop-up guidance]

Being unable to meet your financial commitments could include the following.

- **Default on a credit account or loan agreement:** A default recorded against your credit file is the lender's way of saying 'due to missed repayments, you have now broken the agreement and we can now request the amount in full'. A default can be recorded after three missed payments.

If you are still making payments, but the payment is less than the minimum agreed payment, this may also show as a default and should be declared.

This may result in the lender closing your account to avoid additional outstanding debt.

- **Having arrears on any credit or loan arrangements:** This occurs when you have not made a repayment by its due date (made a late payment) or you have missed one or more regular payments that you contractually agreed to
- **Having a credit, store or charge card withdrawn:** Lenders may choose this action as a way of stopping you from making any more purchases. This may occur if you have:
  - stopped making payments
  - made too many late payments
  - breached the terms of the card agreement
  - consistently exceeded your credit limit

Financial commitments include, but are not limited to:

- credit, debit, store, cheque or charge cards
- any credit or bank accounts
- loans
- mortgages
- hire purchase agreements
- payday loans
- any other credit facility

9.3	Have you been unable to meet any financial commitments?* ⓘ	<No, Yes>
9.3.1	[Yes] Please provide details, including date and reason	

## [9.4 pop-up guidance]

Payday loans are designed to be short-term financial solutions to unplanned situations carrying high interest rates. Due to high interest rates, patterns of reliance on short-term loans could be an undesirable consequence and difficult to resolve.

Payday loans will appear on your credit report and the vetting officer will look to see if there are any indicators of recent or long-term dependencies, signifying potential financial difficulties.

9.4	Have you applied for, or entered into, a payday loan agreement?* ⓘ	<No, Yes>
9.4.1	[Yes] Please provide details, including date, provider, amount and reason for taking out the loan	

## [9.5 pop-up guidance]

Such as:

- a county court judgement (CCJ)
- a Sheriff's Court or Court of Session Decree
- possession or repossession proceedings or orders
- an attachment of earnings or benefits order

9.5	Have you had any court action taken against you for any debts?* ⓘ	<No, Yes>
9.5.1	[Yes] Please provide details, including date, amount of debt involved, reason for debt and whether it is outstanding or satisfied	

[9.6 pop-up guidance]

Any lender includes:

- a bank
- a building society
- a finance house
- a phone contract provider
- a utility company
- another type of financial institution
- any other lender of money

9.6	Have you had any account, credit or loan arrangement refused or terminated by any lender?* ⓘ	<No, Yes>
9.6.1	[Yes] Please provide full details, including number of occurrences and the most recent year	

[9.7 pop-up guidance]

Debt relief orders (DROs) are an indicator of previous financial difficulties, which increase potential vulnerabilities of those who have access to sensitive assets.

It is unlikely that vetting clearance will be granted if you have a DRO that has not yet ended.

If your DRO has finished in the last three years, it is unlikely that you will be granted vetting clearance.

If you finished your DRO three or more years ago, you will need to provide a copy of the DRO, which should:

- show the amounts owed
- show which debts have been taken into the agreement
- include the date of the DRO

9.7	Have you applied for or been granted a debt relief order (DRO)?* <a href="#">i</a>	<No, Yes>
9.7.1	[Yes] Please provide details, including date, amount of debt involved and reason for debt	
9.7.2	Has your DRO finished?	<No, Yes>
9.7.2.1	[Yes] Please provide the date that it ended.	
9.8	Have you arranged a payment plan with any of your creditors, when you have not been able to afford the originally agreed repayments?*	<No, Yes>
9.8.1	[Yes] Please provide details, including date, amount of debt involved and reason	

[9.9 pop-up guidance]

A debt management plan (DMP) is an agreement between you and your creditors to pay all of your debts.

If you are currently in or completed within the last three years, a DMP, you will need to provide a copy of the DMP or agreement. This documentation should:

- show the amounts owed
- show the list of the accounts that have been brought into the plan, including both the initial amount of debt and the remaining balances
- contain details of any repayment schedule
- be dated within the last six months or, if applicable, show proof that the debt has been satisfied

9.9	Have you entered into a debt management plan?* ⓘ	<No, Yes>
9.9.1	[Yes] Please provide details including date, amount of debt involved and reason	

[9.10 pop-up guidance]

If you have a current individual voluntary agreement (IVA), please provide details, including date, amount of debt involved and reason for the debt.

You will be required to provide documentation that you have an IVA repayment plan in place and that you have maintained regular payments over a number of months. The documentation you provide should:

- show the amounts owed
- show the terms of the agreement, including a repayment schedule
- include a list of creditors and accounts

- be dated within the last 12 months or, if applicable, show proof that the debt has been satisfied

A Scottish Trust Deed is a voluntary but formal arrangement where a person grants a 'trust deed' in favour of the trustee which transfers their estate to the trustee for the benefit of the creditors.

9.10	Have you applied for or entered into an individual voluntary arrangement (IVA) or trust deed?* ⓘ	<No, Yes>
9.10.1	[Yes] Please provide details, including date, amount of debt involved and reason for debt	

[9.11 pop-up guidance]

Bankruptcy is an indicator of previous financial difficulties, which increases potential vulnerabilities of those who have access to sensitive assets.

It is unlikely that vetting clearance will be granted if you have been registered bankrupt and have not discharged your bankruptcy.

If your bankruptcy debts have not been discharged for at least three years, it is unlikely that you will be granted vetting clearance.

9.11	Have you applied for or received a bankruptcy order?* ⓘ	<No, Yes>
9.11.1	[Yes] Please provide details	

## [9.12 pop-up guidance]

Bankruptcy is an indicator of previous financial difficulties, which increases potential vulnerabilities of those who have access to sensitive assets.

It is unlikely that vetting clearance will be granted if you have been registered bankrupt and have not discharged your bankruptcy.

If your bankruptcy debts have not been discharged for at least three years, it is unlikely that you will be granted vetting clearance.

If your bankruptcy has been discharged for at least three years, you will need to provide a copy of your certificate of discharge and the bankruptcy order, which should:

- show the amounts owed
- show which debts have been taken into the agreement
- include the date of the bankruptcy

9.12	Have you ever been registered bankrupt?*	<No, Yes>
9.12.1	[Yes] Please provide details, including date, court, amount of debt involved and reason for debt	
9.12.2	Have your bankruptcy debts been discharged?	<No, Yes>
9.12.2.1	[Yes] Please provide date of discharge	
9.13	Have you (or anyone with whom you share financial responsibility) received any large financial gifts or funds totalling more than £9,000, such as inheritance, family gifts,	<No, Yes>

	winnings, pension lump sum, investment fund withdrawal or cryptocurrency earnings?	
9.13.1	[Yes] Please provide details	

[9.14 pop-up guidance]

Financial vulnerability has been a recognised contributor of risk for government organisations and is one of the key factors leading to corruption in policing. This question allows you to provide any additional details about your financial circumstances that have not been directly asked in the previous questions. The information you provide here will assist in a full assessment of your financial security or vulnerability.

Consider including information such as:

- personal savings to cover credit arrangements
- impending property sale or sale of assets
- supporting fees of education (your own or a family member)
- household financial arrangements or dependencies
- other financial dependents/being a guarantor for others
- financial contributors to your bills or debts
- other financial connections you may have
- financial plans for significant previous/current/planned expenditure

9.14	Are there any other details or explanations that would help to clarify your current financial status not already covered in the answers provided above?* ⓘ	<No, Yes>
9.14.1	[Yes] Please provide details	

## Business interests or additional occupations

[Business interests or additional occupations pop-up guidance]

It is essential that the public has confidence in the integrity and impartiality of the police service.

Due to the nature of the work undertaken by the police service, there will be some restrictions on the type of work that will be allowed in addition to your police service role. Although certain restrictions have to be imposed on the private lives of all members of staff, these restrictions will be applied sensibly and flexibly in all cases.

Aspects that will be reviewed can include the following.

- Is there a conflict of interest with the work of the police service?
- Could it have an adverse effect on the trust and confidence of the individual or the police service?
- Could it conflict with the standards of professional behaviour?
- Could it affect your ability to undertake your police service duties, considering both performance and impartiality?
- Could it have an impact on your health, safety and welfare and will it allow compliance with the Working Time Regulations 1998?

You must provide details of any business in which you have a vested interest or via which you have a separate source of income of any form, including self-employed work. This can include:

- any activity that involves financial gain (including secondary employment, property rental, financial or other business interest)
- directorships and/or company secretarial positions, paid or otherwise
- voluntary positions
- generating any income from social media, blogs, gaming sites, websites or any other online activity

Authorisation will be required for you to continue any additional employment, financial or business interest if employed.

## [9.15 pop-up guidance]

The police force or constabulary to which you are submitting your vetting application will have a list of occupations that are unsuitable to pursue while being appointed for certain roles in the police service.

Each set of circumstances will be assessed by the relevant FVU with the information provided. You may be required to submit additional information in adherence to local policies.

9.15	Do you have any business interest or additional employment, not related to your primary duties with the police service, which you plan to continue?* 	<No, Yes>
9.15.1	[Yes] Please provide details of the nature of the employment/interest, name of the business and the extent of your involvement.	
9.16	Do you, your partner or any co-resident living with you, own or run a shop or business which requires a licence or permit granted in pursuance of the law relating to liquor licensing, refreshment houses or betting and gaming or regulated place of entertainment?*	<No, Yes>
9.16.1	[Yes] Please provide details	

## 10. Additional financial information

The following information should be submitted for applicants requiring management vetting (MV) or non-police personnel vetting level 3 (NPPV 3) clearance to provide additional assurance in relation to the integrity, reliability and potential for financial vulnerability of individuals serving in posts with access to sensitive police premises, information, intelligence, financial or operational assets, where:

- the risk of potential compromise of those assets is high
- the risk of serious damage to the force is substantial

For the following questions, you are being asked to provide a clear, complete and accurate picture of your current and recent financial situation.

All responses in this section must reflect the situation of **anyone** who shares financial responsibility with you.

When we look at your finances, our aim is to build up assurance that your situation is manageable and does not present a vulnerability that could be exploited. To do this, we need to understand both the total monthly outgoings and the total amount of money coming into your household.

Should vetting clearance not be granted for financial reasons, you will be advised.

I confirm I have read and understood the 'Additional financial information' section above

## Your overall financial situation

10.1	How would you describe your overall financial situation?*	<Comfortable, manageable, difficult to cope, do not know>
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### [10.2 pop-up guidance]

This may be someone you are paying for or supporting with their costs of living on a regular basis, such as:

- your partner
- your children
- your parent(s)

#### Details required

If you have already provided the details of anyone you have financial responsibility for on your vetting form, you only need to mention them by name here rather than providing their full details. Include your level of financial responsibility for them.

Where an individual has not yet been provided on this vetting application, please provide, where possible, their full name, date of birth, your relationship to them and your shared financial responsibility arrangements.

10.2	Do you have financial responsibility for someone other than yourself?* 	<No, Yes>
10.2.1	[Yes] Please provide their details, including your relationship to them and level of financial responsibility	

## [10.3 pop-up guidance]

Examples of someone who may make a contribution to your financial situation:

- your parent(s)
- your partner
- other family members

...who may contribute to your financial situation by:

- helping meet the costs of running your car
- pay your mobile phone contract
- regularly give you money (whether with the intention to be paid back or not)
- gift or loan lump sums of money for holidays or home improvements

If you do, it may be necessary to explore the impact of their contribution on your financial situation.

10.3	Does anyone make a contribution to your financial situation?* 	<No, Yes>
10.3.1	[Yes] Please provide their details, including your relationship to them and level of financial contributions to your situation	
10.4	Taking into consideration any likely changes to your income and key commitments in the next year, do you expect to be:*	<Much better off, slightly better off, about the same, slightly worse off, much more worse off>

## Property

10.5	Please select the following option that best describes your current accommodation arrangement.*	<Own your home outright, own your home with a mortgage, pay rent, receive accommodation free of charge>
10.6	Do you own any other properties?*	<No, Yes>

### [10.6.1 pop-up guidance]

If you do not have a recent valuation, you may be able to obtain estimates from online property sites, such as Zoopla, Property Checker or Mouseprice.

10.6.1	What is your estimate of the total current market value of all properties owned?	£
10.6.2	Have you extended the term of your mortgage to make it easier to pay, in the past five years?	<No, Not applicable, Yes>
10.6.3	Have you taken out a second mortgage or enlarged your current mortgage, for reasons other than to finance home improvements, in the past five years?	<No, Not applicable, Yes>

## Monthly income and expenditure

The following questions are looking for your monthly income and expenditure, of you and anyone you share financial responsibilities with. This information will support an assessment on your monthly disposable income.

Where you may receive or pay at alternative intervals (such as quarterly or annually), please provide the average monthly figure.

You do not need to include details about any loans or credit cards until you reach the **'What you save and borrow'** section.

[10.7 pop-up guidance]

Enter the salary or salaries received per month, including average bonus and any allowances after tax deduction

10.7	What is the combined take home <b>monthly pay</b> of you and those with shared financial responsibility (mentioned in 10.2.1)?* <a href="#">i</a>	£
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[10.8 pop-up guidance]

Examples of state benefits include, but are not limited to:

- universal credit
- child benefit
- housing benefit
- carer's allowance
- personal independence payment

10.8	What value of state benefits do you receive on a monthly basis?* <a href="#">i</a>	£
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[10.9 pop-up guidance]

Other monthly income may include, but is not limited to:

- pensions and annuities
- savings and investments
- shares
- income from rented properties
- maintenance payments

10.9	What value of any other income do you receive on a monthly basis? * ⓘ	£
10.10	<b>Total monthly income value from 10.7 + 10.8 + 10.9*</b>	£
10.11	If 10.7 and 10.9 include overtime or bonus payments, please provide that value	£
10.12	What are your monthly payments for your rent/board and lodgings/mortgage?*	£

[10.13 pop-up guidance]

Monthly utility payments can include, but are not limited to:

- council tax
- water and fuel
- telephone or mobile phone contract
- internet and TV/streaming services

10.13	What are your monthly utility payments?*	£
	<a href="#">i</a>	

[10.14 pop-up guidance]

Other long-term substantial payments can include, but are not limited to:

- housekeeping
- commuting costs
- maintenance or alimony payments
- nursery or school fees
- subscription payments
- insurance

10.14	Please provide the total cost of any other long-term substantial payments.* <a href="#">i</a>	£
10.15	<b>Total monthly expenditures value from 10.12 + 10.13 + 10.14*</b>	£

## What you save and borrow

This information will support an assessment of your financial stability and flexibility.

Debts that are within your means and manageable are not a barrier to police vetting clearance.

Remember: All responses in this section must reflect the situation of **anyone** who shares financial responsibility with you.

10.16	How often do you save?*	<Regularly, occasionally, hardly ever>
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10.17	How much do you have in savings accounts, ISAs, bonds, premium bonds, invested in shares, funds etc.??*	<£0-£250, £250-£2,500, £2,500-£10,000, £10,000-£25,000, £25,000-£50,000, £50,000+>
10.18	During the last five years, have you received or acquired money or assets worth more than £9,000, other than salary?*	<No, Yes>
10.18.1	[Yes] Please provide the amount and an explanation	

[10.19 pop-up guidance]

Mortgages do not need to be included for this section.

Loan agreements can include, but are not limited to:

- cash loans (whether formal through a financial lender or informal through family members or associates)
- hire purchase agreements
- mail order accounts

10.19	Do you have any outstanding loan agreements?*	<No, Yes>
10.19.1	[Yes] Please provide the number of loan agreements you currently have.	
10.19.2	Please provide the total value left to repay across all of your outstanding loan agreements.	£

10.19.3	Please provide the total <b>monthly repayment</b> value for all of your outstanding loan agreements.	£
10.19.4	Are any of these loans secured against property?	<No, Yes>
10.19.5	Have any of these loans been extended for a period of five years or more?	<No, Yes>
10.19.6	Please indicate the purposes of these loans	*Multi-select* <Home improvements, holidays, debt repayment, stocks and shares, cars, consumer durables, bridging finance, student loan, general expenses, other>

[10.19.7 pop-up guidance]

To allow an accurate and quick assessment of your financial situation, it will be helpful to provide the following for each loan agreement with the summary details:

- bank or financial institution lending the money
- initial value of money received and current remaining balance
- start date of the agreement
- how long you are borrowing the money for
- agreed repayment sums and frequencies
- any changes in the original agreement (for example, change in repayment values, loan term, if you have missed any repayments)

If insufficient or ambiguous information is provided, you will be contacted for further details when your application is being progressed. This could cause unnecessary delays to your vetting application process.

10.19.7	Please provide summary details of your loan agreements ⓘ	
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## [10.20 pop-up guidance]

Credit arrangements can include, but are not limited to:

- credit cards
- store cards
- charge cards
- any other credit facility

10.20	Do you have any credit arrangements?*	<No, Yes>
	ⓘ	
10.20.1	[Yes] Please provide the number of credit arrangements you currently have	
10.20.2	Please provide your total combined credit limit	£
10.20.3	Please provide the total credit outstanding after your last monthly payments	£
10.20.4	Do you normally pay the balance on your cards each month?	<No, Yes>

## [10.21 pop-up guidance]

This should include any joint current accounts you are listed under.

This information is verified through the credit reference check.

10.21	Please provide the number of current accounts you currently have* <a href="#">i</a>	
10.22	Do you regularly use an overdraft facility?*	<No, Yes>

## [10.22.1 pop-up guidance]

Exceeding your overdraft is when you go over the agreed overdraft limit. This will usually result in a fee.

Regularly would be considered as three or more months, in the last six months for example.

10.22.1	[Yes] Do you regularly exceed your agreed overdraft limit?	<No, Yes>
10.23	If you have a negative balance on any of your accounts, please provide details of the accounts and amounts outstanding	
10.24	In the past year, have you been unable to meet any major financial commitments?*	<No, Yes>
10.24.1	[Yes] Please provide details of accounts and amounts outstanding	
10.25	Compared to a year ago, do you owe more or less on your loans, cards and overdrafts?*	<Much more, slightly more, about the same, slightly less, much less>

## Financial circumstances of those with shared financial responsibilities

In the '**Your financial circumstances**' section we requested details about your financial circumstances only.

The role or contract you will be undertaking – and the police and national assets that you require access to – requires you to obtain management vetting (MV) or non-police personnel vetting level 3 (NPPV 3). These vetting levels require you to disclose additional financial circumstances about those you have a shared financial responsibility with.

**Please answer the following questions about the individuals you have shared financial responsibility with – referred to as 'they' in the questions below.**

**Unless otherwise stated, complete these questions in respect of the last six years.**

[10.26 pop-up guidance]

### **Examples may include the following.**

- If you are married or linked to someone through, for example, joint loans, accounts or mortgages, they share financial responsibility with you.
- If you are cohabiting and are jointly responsible for bills, you have shared financial responsibility and would need to include their financial information on the application form as well as yours.
- If you have children and share financial responsibilities with others, you will need to provide their details. If this is the only shared financial responsibility you share with these individuals, you do not need to include their financial information on the application form, but this must be clearly stated in the free text box.
- If you are living with your parents, you do not need to include their details unless you are named on the mortgage or share financial responsibility for the household with them.

### Living in shared accommodation

It would be considered you have shared financial responsibility with co-residents if one person was to leave the household and you would be responsible for their share of the bills.

If each occupant is only responsible for their own lease terms and bills, without being liable for costs where there are vacancies, it would not be considered a shared financial responsibility.

#### Details required

Where an individual has already been entered onto the vetting form, you can mention them by name rather than providing their full details.

Where an individual has not yet been provided on this vetting application, please provide, where possible, their full name, date of birth, your relationship to them and your shared financial responsibility arrangements.

10.26	Do you share financial responsibility with anyone?* 	<No, Yes>  <b>*Does not present questions up to 10.37 if no is selected*</b>
10.26.1	[Yes] Please provide their details, including your relationship to them and level of shared financial responsibility	

[10.27 pop-up guidance]

Such as:

- a county court judgement (CCJ)
- a Sheriff’s Court or Court of Session Decree
- possession or repossession proceedings or orders
- an attachment of earnings or benefits order

- having any account, credit or loan arrangement refused or terminated by any lender
- a debt relief order (DRO)
- a debt management plan (DMP)
- an individual voluntary arrangement (IVA)
- a Scottish Deed Trust
- bankruptcy

10.27	Are you aware of any financial difficulties of anyone whom you have shared financial responsibilities with, may have experienced in the last six years?* 	<No, Yes>
10.27.1	[Yes] Please provide details	
10.28	Do you have any reason to believe that the financial circumstances of anyone with whom you share financial responsibility will change significantly in the next 12 months?*	<No, Yes>
10.28.1	[Yes] Please provide an explanation	

### Final financial declaration

10.29	Are there any additional details or explanations that would help to clarify your current financial position that have not already been provided?*	<No, Yes>
10.29.1	[Yes] Please provide details	

## 11. Contacting you

11.1	During the vetting process, it is sometimes necessary to contact applicants via email, phone or video call, or to hold a face-to-face interview. If it is necessary to contact you, do you require any reasonable adjustments?*	<No, Yes>
11.1.1	[Yes] Please provide details	

## 12. Declaration

### **This is very important**

#### **Please ensure that you read each of the following statements before signing**

1. I understand the information provided on this form will be used by the police service for the purposes of vetting
2. I declare that all the information I have provided in this application is honest and complete to the best of my knowledge and belief and that no relevant information has been withheld
3. I understand that the details contained in this application are being submitted for checking against the information known by the police service, credit reference agencies (where required), relevant security agencies, government departments, third parties and data available in the public domain
4. I understand that open source research and social media checks will be conducted in accordance with the national Vetting Code of Practice and associated authorised professional practice
5. I understand information for the purposes of vetting may be shared with other police forces and relevant government, security or foreign agencies. I understand those forces and agencies may share relevant information for the purposes of vetting with a force or policing body to which I am applying
6. I understand financial checks will be completed (where required) to verify my financial status and I understand that all such information will be treated in confidence
7. I understand it is my responsibility to inform those named on the form that their details have been provided for the purpose of my vetting application (where practical to do so)
8. I understand that I must inform the force vetting unit (FVU), at the earliest opportunity, of any change of circumstances or additions to the information provided. This includes the period between submitting this form and the time you start to work for or with the police service

9. I understand that if I have knowingly made a false statement or deliberate omission, my application may be declined or may make me liable to disciplinary action. I may be denied access to police premises, systems, information or from carrying out any consultancy or contract work in the future
10. I acknowledge that my vetting will be subject to ongoing review and renewal during my police employment, appointment or contract
11. I understand that the information provided as part of the vetting process will be treated in confidence. It is not immune from disclosure and consideration in respect of relevant disciplinary or criminal matters. Where this is the case, information provided in this application may be disclosed in any subsequent investigations
12. I declare that I am not a current or previous member of a [proscribed terrorist organisation or group](#)
13. I declare that I do not know any reason that I may be susceptible to undue influence and therefore unsuitable for vetting clearance

**By submitting this application, I am confirming that I have read, understood and agree to the declaration above**

### 13. Protected characteristic monitoring

The information in this section is for monitoring purposes only. The information supplied will be treated in confidence and will not affect the vetting outcome in any way. Data will be recorded and processed on our database in accordance with the General Data Protection Regulation (GDPR) principles.

Completion of this section is voluntary. However, by completing this form it will greatly improve our information gathering, help us to monitor disproportionality in vetting and shape future policies. The information supplied will be used to form statistics and reports that are high level and will not identify you or any other individuals. If different success rates are evident, it will enable action to be taken to ensure no protected characteristic group is treated unfairly.

**You** can help us build data to improve our awareness and understanding in relation to equality and inclusiveness in the vetting process by sharing information about yourself.

The options provided are aligned with the College of Policing's National Standard for Recording Workforce Data Information criteria, but the limited options are not intended to exclude anyone. If you feel you do not identify with options provided in any of the categories, you are welcome to write in your own description.

The police service is committed to promoting equality of opportunity in line with our responsibilities under the Equality Act 2010 and the public sector equality duty. We endeavour to ensure the following.

- The workforce reflects the diverse society which it serves and that the working environment is free from any form of harassment, intimidation, bullying and victimisation.
- No vetting applicant is treated more or less favourably on the grounds of age, sexual orientation, sex, gender, disability, pregnancy and/or maternity/paternity, gender reassignment, marriage/civil partnership, race or ethnicity and religion or belief.
- No vetting applicant is disadvantaged by conditions or requirements, which cannot be justified by the requirements of the role.

The following categories, questions and guidance have been aligned to the College of Policing National Standard for Recording Workforce Data Information, version 4.6 (September 2022). This is to provide consistency in the police workforce protected characteristic monitoring.

[13.1 pop-up guidance]

This information helps monitor equality between different groups of people of different age groups. Your answer can help to identify disproportionality and discrimination or social exclusion based on age in the police vetting process and work to stop it from happening.

You can also prefer not to say.

13.1	<p><b>Age</b> ⓘ</p> <p>What is your age group?*</p>	<p><input type="checkbox"/> Under 26</p> <p><input type="checkbox"/> 26-40</p> <p><input type="checkbox"/> 41-55</p> <p><input type="checkbox"/> Over 55</p> <p><input type="checkbox"/> Prefer not to say</p>
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[13.2 pop-up guidance]

Disability is a physical or mental impairment, which has a substantial and long-term adverse effect on a person’s ability to carry out normal day-to-day activities. This includes progressive and long-term conditions from the point of diagnosis, such as HIV, multiple sclerosis, cancer, mental illness or mental health problems, learning disabilities, dyslexia, diabetes and epilepsy. This also includes ‘disabled’ as per the definition set out in the Equality Act 2010 and neurodiversity.

Your answer can help develop and monitor policies to make sure that everyone is treated fairly in the police vetting process. These policies affect the way that forces provide services and aim to reduce health inequalities.

It is up to you how you answer this question. If you believe you have a physical or mental health condition or illness as defined by the definition, select 'Yes'.

Remember to include physical or mental health conditions:

- that are not curable, even if medication or treatment can control symptoms
- that you're likely to have for the rest of your life
- that flare up from time to time, even if the flare-up isn't long lasting, for example, eczema
- that may not be perceived as serious and don't affect day-to-day activities, but are still long lasting
- that are managed by treatment and lifestyle adjustments and don't affect day-to-day activities, but are still long lasting

Please do not include temporary illnesses, however serious they might be.

If you do not have any health conditions, or if any you do have do not have a substantial and long-term adverse effect on your ability to carry out normal day-to-day activities, select 'No'.

You can also prefer not to say.

13.2	<p><b>Disability</b> ⓘ</p> <p>Do you consider yourself to have a disability?*</p>	<p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> Prefer not to say</p>
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[13.3 pop-up guidance]

This information can help to:

- treat everyone fairly, in line with legal duties about equality
- develop and monitor policies to improve the lives of disadvantaged groups, including many ethnic minority groups

- measure and understand differences in the lives and opportunities of people from different ethnic groups

**Your answer can help to make changes where there are inequalities in the police vetting process, by gathering information about the experiences of people from different ethnic backgrounds.**

It is up to you how you answer this question. Your ethnic group could be your cultural or family background.

First, choose one option that reflects your identity from the main categories (White, Mixed/multiple ethnic groups, Asian/Asian British, Black/African/Caribbean/Black British or Other ethnic group).

Once you have chosen the category you most closely identify with, select a sub-option in that category. If your ethnic group is not listed, you can select the 'Any other' option in that category and write in your identity.

If you feel you belong to more than one ethnic background from the categories, select 'Mixed or multiple ethnic group'.

You can also prefer not to say.

If your ethnic background doesn't fall within one of the first four listed categories, select 'Other ethnic group' and select an option, then enter your ethnic group if appropriate.

<p>13.3</p>	<p><b>Ethnicity (race)</b> ⓘ</p> <p>What is your ethnic group?*</p> <p>Choose one category, then choose one sub-option that best describes your ethnic group or background</p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> White – United Kingdom/British</li> <li><input type="checkbox"/> White – Irish</li> <li><input type="checkbox"/> White – Gypsy or Irish Traveller</li> <li><input type="checkbox"/> White – Roma</li> <li><input type="checkbox"/> White – Any other White background</li> <li><input type="checkbox"/> Mixed – White and Black Caribbean</li> <li><input type="checkbox"/> Mixed – White and Black African</li> </ul>
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	<ul style="list-style-type: none"><li><input type="checkbox"/> Mixed – White and Asian</li><li><input type="checkbox"/> Mixed – Any other mixed ethnic background</li><li><input type="checkbox"/> Asian/Asian British – United Kingdom/British</li><li><input type="checkbox"/> Asian/Asian British – Indian</li><li><input type="checkbox"/> Asian/Asian British – Pakistani</li><li><input type="checkbox"/> Asian/Asian British – Bangladeshi</li><li><input type="checkbox"/> Asian/Asian British – Chinese</li><li><input type="checkbox"/> Asian/Asian British – Any other Asian background</li><li><input type="checkbox"/> Black/Black British – United Kingdom/British</li><li><input type="checkbox"/> Black/Black British – African</li><li><input type="checkbox"/> Black/Black British – Caribbean</li><li><input type="checkbox"/> Black/Black British – Any other Black background</li><li><input type="checkbox"/> Other ethnic group – Arab</li><li><input type="checkbox"/> Other ethnic group – Any other ethnic group</li><li><input type="checkbox"/> Prefer not to say</li></ul>
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[13.4 pop-up guidance]

This information helps forces monitor equality and potential adverse impact due to someone being pregnant or who has recently given birth or adopted.

Your answer can help to identify disproportionality, discrimination or exclusion based on this and work to stop it from happening in the police vetting process.

Provide an answer that describes your circumstances at the point of being asked.

You can also prefer not to say.

13.4	<p><b>Pregnancy, maternity and adoption</b> ⓘ</p> <p>Which of the following best describes your current circumstances?*</p>	<p><input type="checkbox"/> Currently pregnant</p> <p><input type="checkbox"/> Given birth/adopted within 26 weeks</p> <p><input type="checkbox"/> Not pregnant/given birth/baby adopted within 26 weeks</p> <p><input type="checkbox"/> Prefer not to say</p>
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[13.5 pop-up guidance]

**This information helps forces monitor equality between groups of people of different legal marital or registered civil partnership status. Your answer can help to identify discrimination or exclusion based on this and work to stop it from happening in the police vetting process.**

Please answer about **your legal status**, not your relationship status and select one answer.

**Single:** The status 'Single' is not included. This is because it is a relationship status. This question is asking about your specific legal status.

**Long-term partnerships:** If you're living with your partner, select your current legal status only.

**Legally registered:** This includes marriages and civil partnerships between opposite-sex and same-sex couples. In the UK, marriages and civil partnerships need to be officially registered to be legal.

If you were married or civil-partnered abroad, your answer should be based on the legal status of your relationship in the UK.

You can also prefer not to say.

13.5	<b>Marriage and civil partnership</b> ⓘ  What is your marital or civil partnership status?*	<input type="checkbox"/> Never married and never registered a civil partnership <input type="checkbox"/> Married <input type="checkbox"/> In a registered civil partnership <input type="checkbox"/> Separated, but still legally married <input type="checkbox"/> Separated, but still legally in a civil partnership <input type="checkbox"/> Divorced <input type="checkbox"/> Formerly civil partnered, now legally dissolved <input type="checkbox"/> Widowed <input type="checkbox"/> Surviving partner from a civil partnership <input type="checkbox"/> Prefer not to say
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[13.6 pop-up guidance]

Your answer can help to identify disproportionality, discrimination or social exclusion based on religion and work to stop it from happening in the police vetting process.

It's up to you how you answer this question. If you don't have a religion, please select 'No religion'.

If you want to provide a religion, denomination, branch or caste that isn't listed separately, select the 'Any other religion' option and give its name in the space provided.

You can also prefer not to say.

13.6	<b>Religion or belief</b> ⓘ  What is your religion?*	<input type="checkbox"/> No religion  <input type="checkbox"/> Christian (all Christian denominations)  <input type="checkbox"/> Buddhist  <input type="checkbox"/> Hindu  <input type="checkbox"/> Jewish  <input type="checkbox"/> Muslim  <input type="checkbox"/> Pagan  <input type="checkbox"/> Sikh  <input type="checkbox"/> Any other religion, write in (Free text option)  <input type="checkbox"/> Prefer not to say
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[13.7 pop-up guidance]

**This information helps monitor equality between groups of people of different sexes. Your answer can help to identify disproportionality, discrimination or exclusion based on sex and work to stop it from happening in the police vetting process.**

If you are considering how to answer, use the sex recorded on your birth certificate or gender recognition certificate.

There is a later question on gender identity. This asks if the gender you identify with is different from your sex registered at birth. If it is different, you can then record your gender identity.

You can also prefer not to say.

13.7	<p><b>Sex</b> ⓘ</p> <p>What is your sex?*</p> <p>A question about gender identity will follow</p>	<p><input type="checkbox"/> Female</p> <p><input type="checkbox"/> Male</p> <p><input type="checkbox"/> Intersex</p> <p><input type="checkbox"/> Prefer not to say</p>
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[13.8 pop-up guidance]

This information helps monitor equality between groups of people of different gender identities. Your answer can help identify disproportionality, discrimination or social exclusion based on gender identity and work to stop it from happening in the police vetting process.

It is up to you how you answer this question.

Select 'Yes' if:

- you identify as female and your sex registered at birth was female
- you identify as male and your sex registered at birth was male

Select 'No' if:

- your gender identity is different to the sex recorded on your birth certificate when you were born, for example if you are transgender and/or non-binary

If you answered 'No', please give the term you use to describe your gender in part two of the question.

You can also prefer not to say.

13.8	<p><b>Gender identity</b> ⓘ</p> <p>Is the gender you identify with the same as your sex registered at birth?*</p>	<p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No*</p> <p><input type="checkbox"/> Prefer not to say</p>
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13.8.1	If not, what is your gender identity?*	<input type="checkbox"/> Man <input type="checkbox"/> Woman <input type="checkbox"/> Non-binary <input type="checkbox"/> Prefer to self-describe (free text) <input type="checkbox"/> Prefer not to say
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## [13.9 pop-up guidance]

This information helps monitor equality between groups of people of different sexual orientation. Your answer can help identify disproportionality, discrimination or social exclusion based on sexual orientation and work to stop it from happening in the police vetting process.

It is up to you how you answer this question. Select only one option from the following.

- **Straight/heterosexual** means that you're only attracted to people of the opposite sex
- **Gay or lesbian** means that you're attracted to people of the same sex
- **Bisexual** means that you're attracted to more than one sex
- **Other sexual orientation** lets you give your own answer, for example, pansexual or asexual. This is also voluntary, so you can leave it blank if you prefer.

You can also prefer not to say.

13.9	<b>Sexual orientation</b> ⓘ Which of the following options best describes your sexual orientation?*	<input type="checkbox"/> Straight/heterosexual <input type="checkbox"/> Gay or lesbian <input type="checkbox"/> Bisexual
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		<input type="checkbox"/> Other sexual orientation, write in (free text) <input type="checkbox"/> Prefer not to say
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[13.10 pop-up guidance]

Your answer to this question can help identify whether being born in the UK or not creates any disadvantage in the police vetting process, so work can take place to stop it from happening.

You can also prefer not to say.

13.10	Were you born in the UK?*	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Prefer not to say
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## Appendix J – Police barred and advisory lists information

When a police officer, special constable, member of police staff or designated volunteer is dismissed from a Home Office force or resigns or retires during the course of or prior to gross misconduct proceedings, the police barred and advisory lists must be updated in accordance with the [Police Barred List and Police Advisory List Regulations 2017](#). A flagstone record must be created on the force intelligence system or Police National Database (PND), usually by the professional standards department (PSD).

Former officers subject to gross misconduct investigation or proceedings must similarly have their details added to the barred and advisory lists in line with the legislation and must have flagstone records created in accordance with the [Police National Database \(PND\) Guidance for Submission of Flagstone Records](#).

All updates should be completed within five days of the relevant event. This ensures that the information and intelligence will be detected as a result of a PND check and that forces can comply with the legislation.

On occasion, flagstone records may require deleting, for example following a Police Appeals Tribunal decision that reinstates or a decision not to continue an investigation for a former officer or staff member. This deletion must also be conducted in accordance with the technical guidance.

### Barred and advisory list flagstone records

A particular risk to the police service is the re-employment or appointment of individuals who have resigned or retired while the subject of a gross misconduct investigation or individuals dismissed following gross misconduct proceedings. The requirements of the barred and advisory list legislation must be adhered to. This legislation bars a force or relevant body from appointing or employing anyone on the barred list and requires them to consider the circumstances around any entry on the advisory list. PND flagstone records must be created on local intelligence systems or the PND, in line with the [PND Guidance for Submission of Flagstone Records](#). Further procedural guidance on policing barred and advisory lists is available to force vetting officers via the [Knowledge Hub](#) (login required).

Any questions or advice concerning the police barred or police advisory list can be submitted to: [\*\*Barred.Advisory@college.police.uk\*\*](mailto:Barred.Advisory@college.police.uk)

## Appendix K – Vetting decision record form

[FVU]

A. Vetting applicant information and vetting requirements	
Vetting applicant full name:	
Application ID/Vetting reference:	
Application reason:	Choose an item.
Role clearance required for: [Role title/department/area]	
Role type:	Choose an item.
Police vetting clearance level application:	Choose an item.
National security clearance level application:	Choose an item.
Is subject serving member of the force?	Choose an item.
Current role (if applicable):	
Current clearance level(s) (if applicable):	

B. Application processing summary	
Date application processing	Choose an item.
Vetting researcher:	Choose an item.
Risk reason(s) identified:	Choose an item. Choose an item. Choose an item.
Vetting decision maker:	Choose an item.

Vetting decision:	Choose an item.
Date of decision:	Choose an item.

### C. Gathering of information and intelligence

Include details such as applicant overview, information disclosed on vetting application, research findings from minimum vetting checks on all parties and addresses.

**D. Assess threat, risk and develop strategy**

Identify risk categories and threats related to information/intelligence gathered.

Consider associated vulnerabilities and impact for each threat and risk identified.

Indicate the associated level of risk with an accompanying assessment rationale, referencing relevant APP on vetting sections.

Highlight any matters relating to the standards of professional behaviour or Code of Ethics.

**Select overall current risk rating:** Choose an item.

**E. Powers and policy – select relevant policies and legislation considered for case**

College of Policing Vetting APP

College of Policing Vetting Code of Practice

The Police (Vetting) Regulations 2025

Standards of professional behaviour for police officers and special constables / Police Staff Council standards of professional behaviour for police staff

College of Policing Code of Ethics

Police barred and advisory list

Rehabilitation of Offenders Act 1974 and Exceptions Order 1975

The Police Act 1996

<input type="checkbox"/> <u><a href="#">The Data Protection Act (DPA) 2018</a></u>
<input type="checkbox"/> <u><a href="#">General Data Protection Regulation (GDPR) 2018</a></u>
<input type="checkbox"/> <u><a href="#">Official Secrets Act 1989</a></u>
<input type="checkbox"/> <u><a href="#">Chapter 18 of the Crown Prosecution Service (CPS) Disclosure Manual</a></u>
<input type="checkbox"/> <u><a href="#">The Police Regulations 2003</a></u>
<input type="checkbox"/> Other
<input type="checkbox"/> Other

**F. Risk mitigation strategy and potential restrictions – Options and contingencies**

<b>Mitigation activity</b>	<b>Additional details</b> Related risk, owner, review period, activity details
<p><b>People intelligence meeting summary</b> Date, attendees, comments regarding activity capacity and capability for risk mitigation strategy</p>	

**Exploratory vetting interview meeting minutes with vetting applicant**

Date, type (for example, phone, in person), attendees, questions to and answers from the applicant

**G. Full decision rationale (vetting decision maker)**

Using the [national decision model](#), I have assessed all relevant information/intelligence concerning this vetting applicant to ascertain any potential threat or risk to the public or police assets; be that information, intelligence, financial or other operational assets as well as our staff, the vetting applicant or police premises.

**Vetting decision** – Choose an item.

**Rationale:** Ensure all identified risks and risk mitigation strategies are referred to and commented on, including reference to any consultation meetings, comments and outcomes or exploratory vetting interviews.

**Conditions:**

<input type="checkbox"/> No conditions	<input type="checkbox"/> Clearance requiring additional scrutiny may be affected	<input type="checkbox"/> Unmanageable debt reviews
<input type="checkbox"/> Posting conditions	<input type="checkbox"/> Notifiable association reviews	<input type="checkbox"/> Disclosure to line management
<input type="checkbox"/> System audits	<input type="checkbox"/> Vetting is non-transferable	<input type="checkbox"/> Disclosure to head of department
<input type="checkbox"/> Applicant reviews	<input type="checkbox"/> Social media monitoring	<input type="checkbox"/> Valid until visa expiry
Any other conditions:		

**Date of decision:** Choose an item.

**H. Vetting system record markers**

**Decline reason(s) to add to vetting records management system**

Choose an item.

Choose an item.

Choose an item.

**I. Disclosure**

Can the rationale be provided to the vetting applicant in full or is any redaction required?

Choose an item.

Click or tap here to enter text.

**J. Decision disclosure sheet**

To be used where there is sensitive information within the full vetting decision rationale that may be in a redacted or summarised form, so the vetting applicant can understand the decision taken to the extent possible without disclosing the sensitive information.

## Appendix L – Conducting exploratory vetting interviews

### Exploratory vetting interview preparation

There are two types of interview that can take place as part of vetting procedures: exploratory vetting interviews and withdrawal assessment interviews. This appendix provides guidance on conducting exploratory vetting interviews.

If an exploratory vetting interview is required, forces should conduct it after the completion of all vetting checks. Prior to the exploratory vetting interview, the interviewer should review all relevant information and establish an appropriate professional rapport with the vetting applicant. Appropriate pre-interview communication, from either the interviewer or person arranging the interview, sets the tone for all subsequent contact. It may be necessary to conduct a second exploratory vetting interview if all relevant information is not available or there are unresolved concerns.

Prior to the exploratory vetting interview, the following should be considered:

- a suitable venue where the vetting applicant will speak freely to answer the questions posed to them
- accessibility needs
- any reasonable adjustments required

Where the vetting applicant (either internal or external) is known to be from an underrepresented protected characteristic group, advice should be sought from the force diversity and equality advisor and relevant staff association(s) or trade union(s) prior to the exploratory vetting interview, to identify any equality issues that may affect the vetting decision.

### Support

The vetting applicant can be accompanied to the exploratory vetting interview for support, if they feel they require this. For internal vetting applicants, this person should be a serving member of a police force who is independent of the vetting process or a representative from a staff association or trade union. External vetting applicants may be accompanied by a friend or other person who is not police personnel. Consideration should be given to [data protection](#) if third-party information is being disclosed during the exploratory vetting interview.

Where sensitive information needs to be discussed with the vetting applicant, the support may be asked to step out for a short period. At any point during the exploratory vetting interview, the vetting applicant can request their support to leave.

The details of the individual providing support should be noted in the interview notes, as well as any time they were asked to leave and return to the interview.

## Conducting the exploratory vetting interview

### Building rapport and cooperation

To obtain and retain a vetting applicant's full cooperation and establish a rapport, exploratory vetting interviews should be handled sensitively. The manner and style of communication used by the interviewer may have a greater impact on the cooperation of the vetting applicant than any verbal assurances of confidentiality. The interviewer should remember that the vetting applicant is being asked to speak about matters they might not discuss with close family and friends.

Interviewers should emphasise that information revealed during an exploratory vetting interview is confidential. However, where there is any disclosure of criminal activity for other applicants, this will be referred to the appropriate investigating authority. For existing internal police personnel, there may be cases of disclosure of criminal activity, misconduct or other information so concerning that it could reasonably lead to vetting clearance being withdrawn. The exploratory vetting interview must be stopped and referred to the vetting authority to consider a vetting severity assessment, or in the case of criminal activity or misconduct, the investigative authority or appropriate authority.

The way in which interviewers deal with sensitive information may dictate the extent to which the vetting applicant entrusts them with it. Those conducting the exploratory vetting interview should never make assumptions or display a judgemental stance. They should display neutrality, while appreciating the sensitivity and importance of the interview.

If the vetting applicant finds it difficult to discuss a matter, efforts should be made to establish whether the process could be made easier by using a different interviewer, for example, one of the same sex as the vetting applicant. The interviewer should document these requests and accommodate them when possible.

## Honesty

The success of the exploratory vetting interview, as with other aspects of vetting, depends largely on the honesty of the vetting applicant. Interviewers must make clear to the vetting applicant that absolute honesty is required and that lying, concealing the truth or deliberately withholding information at any stage of the vetting process is a serious matter which may affect their application or maintenance of an existing clearance.

The interviewer should also explain that if the vetting applicant provides information that may cause security concerns, this does not necessarily mean that their application will be declined. Each case will be considered on its own merits.

## Commencing the exploratory vetting interview

At the start of the exploratory vetting interview, the interviewer should:

- explain the [vetting process](#)
- explain that this is an exploratory vetting interview and the reasons for it
- explain the areas which will be covered and the necessity for these enquiries
- explain the sensitive nature of some of the questions
- seek consent to proceed from the applicant

The vetting applicant should then be taken through the forms they have completed. They should be asked whether there are any inaccuracies they wish to correct or if there have been any change of circumstances since completing the forms.

## Questioning

During the exploratory vetting interview, the interviewer will focus their questioning on specific areas relating to the vetting application or vetting information that requires clarity. The rationale for discussing sensitive matters should be fully explained at an exploratory vetting interview so the vetting applicant understands that these issues would not preclude a successful vetting process.

The focus of the questions must be on areas linked to the decision-making process. The interviewer should avoid seeking unnecessary detail on irrelevant issues. The

interviewer should make sure the vetting applicant has understood all the questions asked. Areas covered by the interviewer may include one or more of the following:

- career to date, including satisfaction or dissatisfaction with the employer
- relationships (for example, marriage or cohabitation, family, friends and associates)
- personal circumstances (for example, domestic arrangements)
- lifestyle (for example, foreign travel and contacts, drug and alcohol use, hobbies, sports, study)
- criminal activity
- personal beliefs (for example, political extremism)
- actual or potential conflicts of interest
- financial circumstances

However, interviewers should take a flexible approach to questioning, allowing the vetting applicant to express their views, which can be a useful source of information. It may be beneficial for the vetting applicant to take a break, particularly if they become emotional.

If a vetting applicant declines to discuss a relevant matter, the interviewer should point out that the force will have to take this into account when reaching a decision and that this will likely lead to the clearance being declined.

## Equality, diversity and inclusion

The interviewer should approach questions relating to disability, religion or belief, race or another protected characteristic with caution. Interviewers must be aware of the potential for direct and indirect discrimination and unconscious bias. They should only ask questions about these matters if necessary to facilitate the vetting process.

Any issues relating to the vetting applicant's health should be referred to occupational health for assessment.

## Concluding the exploratory vetting interview

Interviewers should conclude the exploratory vetting interview by establishing whether the vetting applicant is content with the way it has been conducted. This

provides an opportunity to clear up misunderstanding, give feedback about the performance of the interviewer and reduces the likelihood of a subsequent complaint.

The vetting applicant should be given reasonable expectations of the next steps, including a time they should expect any follow-up contact or a decision and any actions that need to be taken following the interview.

Vetting applicants should be told that if the decision is to decline vetting clearance, a rationale for the decision will be provided, on request. This will give, where possible, sufficient detail to understand how the decision was arrived at. Where the decision has been made reliant on information provided at the interview, this will be indicated in the rationale.

## Notetaking and reports

Subsequent reports or interview notes should be factual and accurately reflect the interview content. Where possible, the vetting applicant should be asked to sign a copy of the notes to confirm the accuracy of what was discussed, and may be provided a copy on request. Reports should include the rationale and evidence for making or reaching a particular decision or conclusion.

## Virtual interviews

If an exploratory vetting interview is being conducted on a virtual platform, requesting consent to record the conversation and transcription could assist with note-taking requirements. Transcriptions are not always accurate, and they should be reviewed and amended accordingly after the interview for the file.

## Telephone interviews

Informal exploratory vetting interviews can be conducted over the phone. However, as they are likely to be one-to-one conversations, interviewers should be aware of the risks associated with this and that recordings may not be available.

To ensure an accurate record is made following a phone call, an email should be sent to the vetting applicant detailing the information discussed. This will allow the vetting applicant to clarify any misunderstandings or confirm the accuracy of the details they provided.

## Appendix M – Aide-memoire for vetting decision making

### General considerations

#### Vetting decisions

[8] Vetting decisions should be made in accordance with the national decision model (NDM).

[9.1] Vetting decisions should only be made at the appropriate level, usually by the FVM or nominated individual. Decisions should be made once the decision maker has gathered the necessary information and intelligence to enable an informed, balanced and proportionate decision. They must make their decision in accordance with the Vetting Code of Practice, this APP and [The Police \(Vetting\) Regulations 2025](#).

[8.5.2.d] Where potential threats are identified, there will be associated vulnerabilities. The level of vulnerability is case-specific and depends on the vetting applicant's circumstances. In assessing risk and vulnerability, forces should consider all possible threats, and their likelihood and impact.

## Two-stage test

[9.2] In assessing information and intelligence revealed as part of the vetting process, forces should apply a two-stage test.

1. Are there reasonable grounds for suspecting that the applicant, a family member or other relevant associate:
  - is or has been involved in criminal activity?
  - has financial vulnerabilities (vetting applicant only)?
  - is, or has been, subjected to any adverse information?
2. If so, is it appropriate, in all the circumstances, to decline or withdraw vetting clearance?

[8.8.2] Vetting decision makers should assess information on a case-by-case basis. They should consider the specific circumstances of each case and nature of the information revealed.

[Appendix N 2.4] The more serious the allegation, the greater the need for scrutiny.

### [8.5.4.a] Circumstances that may impair judgement or result in vulnerability to pressure or inducements

[8.5.4.b] The following factors can impair a vetting applicant's judgement, which may lead to them being vulnerable to pressures, inducements or bribes:

- financial difficulties or unmanageable debts
- misuse of alcohol
- compulsive or excessive gambling
- misuse of controlled or prescribed drugs

[8.5.4.c] Assessments should be made on circumstances that present risk factors. Poor judgement or vulnerability to pressure or inducements could affect the confidentiality, integrity or availability of criminal, financial or operational police intelligence assets.

#### [8.5.4.d] Assessing the criteria for trustworthiness

[8.5.4.e] Before forces grant clearances, particularly with those requiring risk mitigation strategies, the following factors should be taken into account:

- Security implications of any adverse information obtained during the vetting process. For example, it may be necessary to give greater weight to some factors than others.
- Significance of any past conduct or circumstances.
- The maturity and character of the vetting applicant.
- Distinctions between isolated or minor blemishes on the vetting applicant's record and information pointing to habitual or significant vulnerabilities.
- Openness, honesty and integrity through the whole recruitment process and vetting process.

### [8.5.3] Factors requiring particular scrutiny

[8.5.3.a] Each case needs to be considered on its own merits, bearing in mind the role, public contact and assets to be accessed. A case should receive particular scrutiny if any of the following factors are present:

- Adverse recruitment intelligence through previous police service recruitment processes.
- Previous decline or withdrawal of police vetting clearance.
- Providing false or deliberately misleading information or omitting significant information from the vetting application form.
- Failure to disclose a change of circumstance.
- Association with people who have previous convictions or who are reasonably suspected of being involved in crime, which could not be managed by any risk mitigation and notifiable association policy, or where these are not being complied with.
- Financial vulnerability.
- Improper or inappropriate online activities.
- Dismissal from a previous role for conduct concerns.
- Probationary constables discharged from the police service under [Regulation 13 of the Police Regulations 2003](#).
- Evidence of violence, intimidation, harassment, discrimination, racism, homophobia or disablism.
- Evidence of violence against women and girls (VAWG).
- Evidence of sexual impropriety, sexism, misogyny, domestic abuse, stalking/harassment or controlling or coercive behaviour.
- Abuse of position, including APSP.
- Evidence of unsatisfactory professional behaviour not in keeping with the behavioural expectations and principles in the [Code of Ethics](#).
- Adverse counter corruption intelligence.
- Significant adverse complaint or conduct history.

- Significant or repeated performance matters.
- Previous breaches of the **standards of professional behaviour.**
- Past infringement of security or vetting policy or procedures.
- Drug and alcohol misuse.
- Identified conflict of interest.
- Patterns of adverse behaviours.
- Other inappropriate behaviour that impinges on a person's suitability to serve in the role.
- Other identified areas of concern, such as an individual's character, maturity and integrity.

This list is not hierarchical or exhaustive.

**[8.5.3.b] The presence of one or a combination of these factors can lead to vetting being declined or withdrawn. Where any of these factors are present, but clearance is being granted, the full rationale must be recorded. The decision must be approved by the FVM or nominated individual.**

[8.5.3.c] In assessing threat and risk, the assessment of risk to vulnerable individuals [6.5.14] should always be considered for all police vetting levels.

## Rationale

[6.2.2] Forces must record:

- Information provided by the vetting applicant.
- The results of vetting enquiries.
- A detailed rationale for declining, suspending, withdrawing or granting clearance, including details of any restrictions or conditions.
- Granted vetting clearance levels and renewal dates for each vetting applicant.
- Details of any vetting reviews throughout the clearance period.
- Details of vetting appeals received, the appeal considerations and outcome, both in a manner to provide management information and a full account.
- A detailed rationale where adverse information has been revealed and considered. This must note all identified risks and take account of all relevant factors in the vetting decision. It must reference relevant sections of this APP or any relevant policy or legislation considered when recording the decision.
- A record of withdrawal assessments, including the decision on the outcome and the finding in any appeal.
- A record of police personnel who have resigned or retired prior to the conclusion of any withdrawal assessment procedure.

[3.5.2] FVMs should ensure that a full decision rationale is recorded, detailing all risks identified and relevant factors assessed in any vetting decision.

[Appendix N 3.4] A full rationale should be recorded where the vetting applicant has been the subject of a criminal investigation which has resulted in no further action and clearance has been granted.

## [8.7] Common risk categories

Convictions/cautions		
<p>[Appendix N 2.1] Convictions and cautions that are revealed by the applicant or through the vetting process should be subjected to a proportionate risk-based assessment that considers the circumstances.</p> <p>[Appendix N 2.1]</p> <ul style="list-style-type: none"> <li>▪ Forces should not identify a prescriptive list of convictions and cautions that would lead to a vetting clearance being declined.</li> <li>▪ Each case must be considered on its own individual merits</li> </ul> <p>[8.6.2.b] Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 applies to <b>all</b> police officer and special constable posts</p>	<p>[Appendix N 2] <b>Clearance declined for</b></p> <ul style="list-style-type: none"> <li>× Prison sentence</li> <li>× Registered sex offender/sex offender requirement</li> </ul> <p>[Appendix N 2] <b>Should result in clearance declined:</b></p> <ul style="list-style-type: none"> <li>× Dishonest or corrupt practices</li> <li>× Relates to violence</li> <li>× Is a contact or non-contact sexual offence</li> <li>× Demonstrates targeting of persons due to their vulnerabilities or protected characteristics (including offences motivated by hate or discrimination, domestic abuse or where vulnerable people were targeted)</li> </ul>	<p>[Appendix N 2]</p> <ul style="list-style-type: none"> <li>▪ Particular care must be taken – convictions/cautions</li> <li>▪ Rebuttable presumption = decline clearance</li> <li>▪ [Appendix N 2.4] Take into account exact circumstances. The more serious the allegation, the greater the need for thorough scrutiny</li> <li>▪ [Appendix N 2.1] Examples where this may be <b>disproportionate and clearance may be justified</b> <ul style="list-style-type: none"> <li>✓ Juvenile</li> <li>✓ Length of time passed</li> <li>✓ Not serious</li> </ul> </li> </ul> <p>and</p> <ul style="list-style-type: none"> <li>✓ Commitment to helping individuals/communities in subsequent years</li> </ul>

[Appendix N 2.1] What should be considered when making the assessment:

- whether the criminal investigation is ongoing
- the nature and seriousness of the offence, such as evidence of violence, intimidation, harassment, discrimination, domestic abuse or contact or non-contact sexual offences
- age of the vetting applicant at the time of the offence and length of time passed since the conviction or caution was obtained, and whether they have demonstrated a commitment to help individuals or communities in the subsequent years
- level of involvement of the vetting applicant in the criminal behaviour
- forthcoming nature and openness of the vetting applicant
- the vetting applicant's motivation to commit the offence
- evidence of repeat offending
- impact on public confidence in the force or police service
- nature of the role, including working with vulnerable individuals and involvement in the evidence chain
- level of clearance required
- relevance of the information to the post for which clearance is required, including unsupervised and unrestricted access to assets and premises
- the vetting applicant's behaviour in the period since the conviction or caution
- other associated factors listed under 8.5.3.a

[Appendix N 2.4] 'In the unlikely event where a youth disposal is the sole factor or a significant factor in declining vetting clearance, a clear rationale should be recorded on the vetting file to document the decision.'

## Untested allegations

[Appendix N 3] (recorded in the form of intelligence)

[Appendix N 3.1] Some considerations include:

- the reliability and credibility of the intelligence, information or allegation, including the intelligence grading
- the number and severity of allegation(s)
- the reason for the matters not being progressed
- any potential conflict of interest that could compromise an operation, investigation or may impair the vetting applicant's judgement
- the threat, vulnerability and impact it could have on the public, the vetting applicant and the police service

## Other non-conviction data

[Appendix N 3] A case-by-case assessment must be made where the vetting applicant has previously come to adverse police attention that did not result in a conviction or caution.

[Appendix N 3.1] Some considerations include:

- the number and severity of allegation(s)
- the age of the vetting applicant at the time and amount of time passed since the report
- forthcoming nature and openness of the vetting applicant
- the reason for the matters not being progressed
- evidence of violence, intimidation, harassment, discrimination or drug misuse
- evidence of violence against women and girls (VAWG)
- evidence of sexual impropriety, sexism, misogyny, domestic abuse, stalking/harassment or controlling or coercive behaviour
- the threat to the safety and wellbeing of a third party

- any unauthorised association with people who have previous convictions or are reasonably suspected of being involved in crime
- the threat, vulnerability and impact it could have on the public, the vetting applicant and the police service
- [Appendix N 3.1] where the applicant is subject of civil proceedings or protective measures

[Appendix N 3] Membership of a proscribed terrorist organisation or group is a criminal offence, therefore current membership or any previous membership of such organisations has a rebuttable presumption that vetting clearance will be declined.

[Appendix N 3] Membership of any extremist group or association that has aims and objectives that are contrary to the Code of Ethics and standards of professional behaviour will ordinarily result in vetting clearance being declined.

## Open source

[Appendix N 5] Open source enquiries should provide a reassurance that the vetting applicant's online behaviour is compatible with the [standards of professional behaviour](#).

[Appendix N 5.1] When assessing threat and risk regarding the results of open source enquiries, the following can be included to assist the assessment depending on the context of the information.

- What public information is available regarding the vetting applicant?
- Have the open source enquiries shown the vetting applicant uses social media responsibly and safely?
- If the vetting applicant is shown as a director on Companies House, have they declared their business interest, or advised of plans to cease this activity on recruitment?

- Is there any adverse information regarding the vetting applicant on any professional registers, such as any of the healthcare regulators or legal professional registers?
- Are there any adverse news reports relating to the vetting applicant?
- Is there any evidence of improper or inappropriate online activities, such as discriminatory, abusive, misogynistic, oppressive, harassing, bullying, victimising, offensive publications by the vetting applicant, or evidence of their support or sharing of such materials published by others?
- What was the age of the vetting applicant and how much time has passed since the activity took place?
- What sites did the activity take place on?
- Was the vetting applicant personally identifiable?
- Is a pattern of concerning behaviour evident through the open source enquiries?
- Are there any personal security concerns associated with the vetting applicant's online activity?
- Has the vetting applicant published any material that might undermine their reputation or that of the policing profession, or might run the risk of damaging public confidence in the police service?
- Have the open sources checked revealed any undisclosed information, required to be provided as part of the vetting process?

### Information relating to third parties (partners/family/associates or any other third party)

[Appendix N 6.1] Where adverse information relating to a third party is revealed, consideration must be given to the risk that this information poses to the force, the vetting applicant and the public. If there is potential risk from third parties, forces must consider these cases on their individual merits.

[Appendix N 6.1] The following should be considered:

- the nature of the relationship
- the openness of the vetting applicant or likelihood of awareness
- how recent the police interest was
- any evidence of distance between the vetting applicant and the associate
- any financial relationship
- the likelihood of the vetting applicant coming across the third party or requiring them to handle their information in their job role
- the likelihood that the vetting applicant's performance of duty may be adversely affected, for example, through adverse pressure or a conflict of interest
- the nature, location, number and seriousness of the offences or involvement in criminal activity, as well as the time period over which these took place
- the likelihood of damage to the force's operational capability
- the potential for information leakage
- whether the circumstances are likely to bring discredit to, or embarrass, the police service or police force
- whether there are any impending prosecutions or ongoing investigations that may require monitoring
- any other factors relating to the vetting file that could increase the susceptibility to corruption or coercion

## Financial checks

[6.5.12.a] Credit checks are used to assess whether vetting applicants:

- have been, are currently, or are likely to be in financial difficulty
- show signs of financial irresponsibility, to the extent that they could become vulnerable to financial inducement

[Appendix N 4.1] The vetting process requires assessment of the vetting applicant's financial vulnerabilities, as to whether they have been, are currently or are likely to be in financial difficulty, or if they show signs of financial irresponsibility to the extent that they could become vulnerable to financial inducement.

[Appendix N 4.1] Vetting decision makers should be cognisant to the economic climate and cultural factors that may provide additional context to a vetting applicant's financial circumstances, which can be clarified with them.

[Appendix N 4] Debts only become a problem when they are substantial and vetting applicants fail to take remedial action, where they are caused by compulsive behaviour such as compulsive or excessive gambling, or are as a result of criminal activity.

[Appendix N 4.1] Each application should be assessed using all available information and should consider:

- the degree of risk presented by the amount and the ability to meet payment commitments
- the force's appetite for risk
- the force counter corruption strategy

[6.5.12.d] Circumstances associated with high financial vulnerability that are unlikely to lead to a level of police vetting clearance being granted include vetting applicants who have:

- an outstanding county court judgment (CCJ)
- been registered bankrupt and three years have not passed since the date their bankruptcy was discharged
- been granted a debt relief order (DRO) and three years have not passed since the date it was finalised

[Appendix N 4.2] Where an IVA repayment plan is in place, the vetting decision maker should satisfy themselves that the vetting applicant has maintained regular payments over a number of months before considering granting clearance.

[Appendix N 4.2] Vetting applicants who can show they have adhered, and are adhering to, debt management arrangements may be considered. Documentary evidence should be provided to demonstrate their commitment and adherence to any such debt management arrangements.

[Appendix N 4.1] The financial scoring template can be used to assist forces in assessing potential financial vulnerability for MV and NPPV level 3 financial assessments, where required.

## Appendix N – Common vetting risk categories

This appendix gives information on common risk categories identified through the police vetting process to support vetting decision makers in [constructing a decision rationale](#) and to reflect the relevant section of APP in that rationale. The risk categories provided are not exhaustive or hierarchical.

### 1. Integrity

Acting with integrity at all times is one of the [standards of professional behaviour](#) and is integral to vetting risk considerations.

Demonstrating integrity is not just a matter of disclosing information when requested as part of the vetting process, but being forthcoming with accurate and relevant information, taking responsibility for one's own actions and demonstrating the [standards of professional behaviour](#) and the [Code of Ethics](#), both in and out of work.

An identified lack of integrity can increase the risk of a vetting applicant where any other risk factors are present, as it contributes to the assessment of trustworthiness when considering risk mitigation or management options.

Under the [Rehabilitation of Offenders Act 1974 \(Exceptions\) Order 1975 \(ROA\)](#), police staff and non-police personnel vetting applicants **are not required** to disclose protected convictions or cautions when answering questions relating to their conviction history.

All vetting applicants are expected to disclose accurate information on their vetting submission and for any subsequent vetting enquiries.

#### 1.1. Assessing threat and risk

Detail on factors requiring particular scrutiny that could raise integrity concerns is included in section [8.5](#) of the Vetting APP.

Where information has been uncovered through vetting enquiries, but not disclosed as expected by the vetting applicant, considerations such as the following should be made.

- Was this due to an oversight or misunderstanding?

- Is the vetting applicant legally exempt from having to make such disclosure under the [ROA](#)?
- Has the vetting applicant made the declaration on a previous application?
- How long ago was the incident?
- Is there evidence to prove the vetting applicant would have been aware?
- What is the risk of the applicant coming across or obtaining this uncovered information through their job role?

## 1.2. Developing a working strategy

Where information is revealed during the police vetting process but has not previously been declared by the vetting applicant, strategies should be considered to address and assess the integrity concern, in line with factors mentioned under [disclosure of information to the vetting applicant](#). Wherever possible, the vetting applicant should be given time to reflect on and recall previous incidents, following further vetting enquiries.

Where the vetting applicant has omitted to declare an individual whose details are required on vetting forms (such as a sibling) and adverse information is held about that individual, the assumption should be that the details have been deliberately omitted. This should be treated as a potential integrity issue in the first instance, following the principles set out in section [8.5.5.a](#) of the Vetting APP.

The risk may potentially be accepted if the vetting applicant makes a declaration following a prompt. The vetting decision maker should consider working strategies to further assess their integrity, including:

- requesting further information from the vetting applicant via email, phone, [exploratory vetting interview](#) or requesting evidence relating to matters, as well as seeking an explanation for the initial lack of disclosure
- review HR reference responses or verify data submitted on the job application
- request a supervisor appraisal to be completed where appropriate

## 1.3. Powers and policy

Details of powers and policies are set out in section [8.6](#) of the Vetting APP.

## 1.4. Identifying options and contingencies

Details of options and contingencies are set out in section [8.7](#) of the Vetting APP.

The vetting decision maker will need to determine whether there are still doubts over the vetting applicant's honesty, openness and integrity. Where integrity concerns remain, there is an impact on the trustworthiness of the vetting applicant. As a consequence, this will reduce the effectiveness of and confidence in any [risk mitigation strategies](#) available. This brings into question whether the vetting applicant meets the standards of professional behaviour required.

In cases where there is still doubt, vetting clearance should be declined at this stage on the grounds of integrity concerns. The vetting applicant will have the opportunity to appeal against this decision (see [vetting appeals](#)), during which representations can be made in relation to the non-disclosure.

## 2. Convictions, cautions and impending cases

Convictions and cautions must be assessed to consider any previous unlawful behaviour the vetting applicant has been convicted or cautioned for, that could affect the public's trust and confidence in the police service. All convictions, cautions and impending cases present a risk to the police service.

The existence of a criminal record would clearly indicate reasonable grounds for concluding that the vetting applicant is, or has been, involved in criminal activity.

Vetting clearance for a police officer, special constable or member of police staff is to be declined in all cases where:

- offences were committed as an adult or juvenile that resulted in a prison sentence (including custodial, suspended or deferred sentences and sentences served at a young offenders' institution or community home)
- the vetting applicant is, or has been, a registered sex offender or is subject to a registration requirement in respect of any other conviction

For all other convictions or cautions there is a rebuttable presumption, subject to the conditions of the ROA (see section [8.6.2](#) of the Vetting APP), that vetting clearance will be declined, especially where the criminal offence:

- relates to dishonest or corrupt practices

- relates to violence
- is a contact or non-contact sexual offence
- demonstrates a targeting of persons due to their vulnerabilities or protected characteristics (including offences motivated by hate or discrimination, domestic abuse or where vulnerable people were targeted)

## 2.1. Assessing threat and risk

Convictions and cautions that are revealed by the vetting applicant or through the vetting process should be subjected to a proportionate risk-based assessment that considers the circumstances of:

- convictions
- cautions
- reprimands
- formal warnings
- final warnings
- fixed penalty notices
- out of court disposals, including community resolution
- restorative justice disposals

Forces should not identify a prescriptive list of convictions and cautions that would lead to vetting clearance being declined. Each case must be considered on its own individual merits in relation to the role being undertaken and the assets being accessed, subject to the criteria highlighted in [section 2](#).

The assessment of convictions and cautions should consider both the circumstances of the offence and the potential effect that those circumstances may have on the vetting applicant's role in the police service, including their suitability to have access to police assets and vulnerable people. The following are examples of considerations when making the assessment:

- whether the criminal investigation is ongoing
- the nature and seriousness of the offence, such as evidence of violence, intimidation, harassment, discrimination, domestic abuse or contact or non-contact sexual offences

- age of the vetting applicant at the time of the offence and length of time that has passed since the conviction or caution was obtained and whether they have demonstrated a commitment to help individuals or communities in the subsequent years
- level of involvement of the vetting applicant in the criminal behaviour
- forthcoming nature and openness of the vetting applicant
- the vetting applicant's motivation to commit the offence
- evidence of repeat offending
- impact on public confidence in the force or police service
- nature of the role, including working with vulnerable individuals and involvement in the evidence chain
- level of clearance required
- relevance of the information to the post for which clearance is required, including unsupervised and unrestricted access to assets and premises
- the vetting applicant's behaviour in the period since the conviction or caution
- other associated factors listed under **factors requiring particular scrutiny**

This list is not hierarchical or exhaustive.

## 2.2. Developing a working strategy

A number of working strategies could be taken depending on the factors presented which could include:

- requesting further information from the vetting applicant by email, phone call or **exploratory vetting interview** (as appropriate)
- viewing job application employment references
- requesting a supervisor appraisal
- conducting a case file review of the incident or liaison with the officer in charge of the case

Where **biometric vetting results produce a positive trace**, appropriate action should be taken to ensure it is investigated appropriately to satisfactorily resolve the positive trace prior to a vetting decision. This could include:

- reviewing police system check results
- reviewing the case file of the associated crime
- liaising with the officer in the case, if possible
- conducting an [exploratory vetting interview](#) to identify if there is a legitimate reason for the trace

Where there is a positive biometric vetting result for serving police personnel (for example, a member of police staff applying to become a regular police officer or a special constable), a referral must be made to the relevant professional standards department (PSD) for appropriate action.

### 2.3. Powers and policy

Details of powers and policies are set out in section [8.6](#) of the Vetting APP.

The assessment of threat and risk regarding a vetting applicant's convictions and cautions should be considered alongside associated powers and policies, in particular:

- [Rehabilitation of Offenders Act 1974 \(ROA\)](#)
- Chapter 18 of the [CPS disclosure manual](#)
- [Criminal Procedure and Investigations Act 1996 \(CPIA\)](#)

Other closely related powers and policies include:

- [Code of Ethics](#)
- Standards of professional behaviour for [police officers and special constables](#) and [police staff](#)
- [Counter corruption](#) APP (official-sensitive) which is only available to counter corruption professionals via the Knowledge Hub

### 2.4. Identifying options and contingencies

Details of options and contingencies are set out in section [8.7](#) of the Vetting APP.

The rebuttable presumption is that cautions and convictions should lead to vetting clearance being declined. However, there will be cases where this may be disproportionate in the circumstances.

Vetting decision makers should assess such information on a case-by-case basis, taking into account the exact circumstances of the case and nature of the information revealed. The more serious the allegation, the greater the need for thorough scrutiny.

Where cautions, reprimands and warnings have been issued to juveniles or youths, it is fully accepted that the offence will have been admitted for the caution, reprimand or warning to be issued. However, the intended purpose of these crimes should not be dismissed. Youth disposals of this nature are designed as a form of early intervention and intended to be preventative, curative and rehabilitative, as well as promoting welfare. At the time of issue, the recipient is considered to still be forming their moral bearings and this should be taken into account when considering suitability for clearance. The potential impact of youth matters on suitability for vetting clearance will diminish with the passage of time.

In the unlikely event the youth disposal is the sole factor or a significant factor in declining vetting clearance, a clear rationale should be recorded on the vetting file to document the decision. However, there is still the potential integrity element to consider should any such matter not be declared. Where vetting enquiries detect youth cautions, reprimands or warnings that have not been declared, an interview should be conducted to ascertain the reasons for this (see section [8.5.5.a](#) of the Vetting APP).

The following should be taken into account for existing internal police personnel:

- who have previously had and declared a conviction or caution on appointment or commencement of employment, and
- which was accepted by the force under a previous police vetting regime that applied a different standard to a conviction or caution, where they are exempt from the ROA (see section [8.6.2](#) of the Vetting APP)

During any vetting reviews or when renewing clearance to the same vetting level, the presence of the previously assessed conviction or caution should not result in clearance automatically being withdrawn or declined on renewal. In such circumstances, careful consideration should be given to the factors that weigh against the rebuttable presumptions (see [section 2](#)), taking account of good service and conduct demonstrated by the vetting applicant while serving with the police.

Where the vetting applicant is applying for a vetting clearance level that requires more scrutiny than the one they currently hold, the appropriateness of the vetting applicant's criminal record must be considered as it would for other applicants.

Where the force vetting unit (FVU) is in a position to accept a vetting applicant with a previous conviction or caution, who will be required to disclose their criminal record under the Chapter 18 requirements of the [CPS disclosure manual](#), the decision to grant clearance remains the responsibility of the FVM or nominated individual.

However, before granting clearance to an applicant who has a previous conviction or caution, the vetting file must be passed to the head of professional standards or nominated authority. They must determine if the risk is acceptable and liaise with the head of criminal justice.

Where an applicant is granted vetting clearance but they have a protected caution or conviction, there is still a requirement for disclosure under Chapter 18. Local processes should allow such details to be recorded in a manner that ensures compliance with the [Criminal Procedure and Investigations Act 1996](#) and [Chapter 18 of the Crown Prosecution Service Disclosure Manual](#). Where the decision is made to accept the vetting applicant with a previous conviction or caution, the PSD will provide advice regarding the vetting applicant's obligation to reveal their criminal history when submitting evidence to the CPS. Where an applicant is granted vetting clearance but they have a protected caution or conviction, there is still a requirement for disclosure under Chapter 18.

[Risk mitigation strategies](#) should be considered where the [ROA](#) allows a vetting applicant's convictions and cautions to be considered. Vetting decision makers should provide a full rationale on their vetting decision record form. See [Appendix K](#).

For police officers and special constables, where vetting applicants have convictions, cautions or other disposals (such as reprimands, warnings, fixed penalty notices for disorder and arrests), details should be recorded in the full decision rationale.

In respect of police staff and non-police personnel, only criminal convictions or cautions that are not protected under the ROA can be considered and should be recorded in the full decision rationale.

### 3. Intelligence and other non-conviction data

Intelligence and other non-conviction data relates to information received or discovered in relation to the vetting applicant or vetting clearance holder, which requires an assessment of suitability to hold or maintain vetting clearance.

Intelligence and other non-conviction information may lead to reasonable grounds for suspecting involvement in criminal activity.

A case-by-case assessment must be made where the vetting applicant has previously come to adverse police attention that did not result in a conviction or caution, such as:

- where the vetting applicant has been arrested
- where the vetting applicant was the subject of a criminal allegation that resulted in no further action
- where the vetting applicant was the subject of an investigation that resulted in no further action

The legal restrictions of the ROA do not apply to cases where the vetting applicant did not receive a conviction or caution, therefore the circumstances of such cases must be considered for all vetting applicants, regardless of the role they are applying for.

Membership of a **proscribed terrorist organisation or group** is a criminal offence, therefore current membership or any previous membership of such organisations has a rebuttable presumption that vetting clearance will be declined.

Membership of any extremist group or association that has aims and objectives that are contrary to the **Code of Ethics** and **standards of professional behaviour** will ordinarily result in vetting clearance being declined.

#### 3.1. Assessing threat and risk

Intelligence or non-conviction data, that is revealed by the vetting applicant or through the vetting process, should be subjected to a proportionate risk-based assessment that considers:

- the reliability and credibility of the intelligence, information or allegation, including the intelligence grading, where applicable

- 
- intelligence gathered through previous police service recruitment processes
  - the number and severity of allegation(s)
  - the age of the vetting applicant at the time and amount of time that has passed since the report
  - forthcoming nature and openness of the vetting applicant
  - the reason for the matters not being progressed
  - improper or inappropriate online activities
  - evidence of violence, intimidation, harassment, discrimination or drug misuse
  - evidence of violence against woman and girls (VAWG)
  - evidence of sexual impropriety, sexism, misogyny, domestic abuse, stalking/harassment or controlling or coercive behaviour
  - the threat to the safety and wellbeing of a third party
  - any unauthorised association with people with previous convictions or who are reasonably suspected of being involved in crime
  - any potential conflict of interest that could compromise an operation, investigation or may impair the vetting applicant's judgement
  - the threat, vulnerability and impact it could have on the public, the vetting applicant and the police service

Assessments must be made on a case-by-case basis where the applicant is the subject of civil proceedings or protective measures, including but not limited to:

- domestic violence protection notice or order
- female genital mutilation protection order
- forced marriage protection order
- non-molestation order
- restraining order
- occupation order
- sexual harm prevention order
- sexual risk order
- stalking protection order

- slavery and trafficking prevention and risk order
- violent offender order
- anti-social behaviour order
- football spectator banning order

### 3.2. Developing a working strategy

Details of developing a working strategy are set out in section [8.5.5](#) of the Vetting APP.

Consideration should be given to conducting an [exploratory vetting interview](#) to address any concerns following the assessment of intelligence and non-conviction data, unless the enquiry can be proportionately resolved via an email exchange.

Untested allegations recorded in the form of intelligence can be put to a vetting applicant during an [exploratory vetting interview](#) where appropriate, so they are given a chance to respond, to support procedural fairness. However, careful consideration must be taken if revealing the allegation could reveal a source, threaten the safety or wellbeing of a third party or compromise an operation or investigation. In such circumstances, the vetting decision maker would need to make a proportionate vetting decision on the information available, without giving the vetting applicant the chance to respond.

Further enquiries that could also take place include:

- a review of the full case file
- liaising with the officer in charge of the case
- requesting further information from the force owning the data
- ensuring any available information regarding the reason not to progress with an investigation has been identified
- identifying any irrefutable evidence to show the allegations were false or malicious
- requesting a supervisor appraisal

Risk mitigation strategies should be explored with other departments (see section [8.7.2](#) of the Vetting APP) who may be able to assist with risk management activities, such as periodic system auditing, proportionately restricting systems access,

facilitating geographical or departmental restrictions, making a disclosure to the head of department, providing specific risk management and welfare advice or exploring options openly with the vetting applicant.

### 3.3. Powers and policy

Details of powers and policies are set out in section [8.6](#) of the Vetting APP.

Powers and policies that might be considered include, but are not limited to, the following.

- [Code of Ethics](#)
- [Standards of professional behaviour](#)
- [APP on counter corruption](#)
- [APP on information management](#)
- [Freedom of Information Act 2000 \(FOIA\)](#)
- [Data Protection Act 2018 \(DPA\)](#)
- [Computer Misuse Act 1990](#)

### 3.4. Identifying options and contingencies

Details of options and contingencies are set out in section [8.7](#) of the Vetting APP.

Where forces decide it would be inappropriate to put untested allegations to the vetting applicant, they should record the rationale for doing this on the vetting file.

[Risk mitigation strategies](#) should be explored, considering how any identified risks could be effectively mitigated or managed. This could include:

- providing tailored advice to the vetting applicant and agreeing a risk management plan
- scheduled focused vetting reviews, as part of ongoing risk management
- conducting regular police system use audits
- geographical or department restrictions
- making a disclosure to the head of department (obtaining consent where required)

A full rationale should be recorded where the vetting applicant has been the subject of a criminal investigation which has resulted in no further action and clearance has been granted.

Where the vetting applicant has been the subject of a criminal investigation which has resulted in no further action, vetting decision makers are entitled to be risk averse, as long as there are reasonable grounds for suspicion and the rationale is fully documented.

If vetting clearance is declined based on an untested allegation or intelligence that has not been discussed with the vetting applicant, the rationale for this should be recorded in the vetting decision record form. See [Appendix K](#).

The following should be taken into account for existing internal police personnel who had adverse information on appointment or commencement of employment, which was accepted by the force under a previous police vetting regime that applied a different standard of risk acceptance.

During any vetting reviews or when renewing clearance to the same vetting level, the presence of the previously assessed adverse information should not automatically result in clearance being withdrawn or declined on renewal. In such circumstances, careful consideration should be given to any risk mitigation, taking account of good service and conduct demonstrated by the vetting applicant while serving with the police.

Where the vetting applicant is applying for a vetting clearance level that requires more scrutiny than the one they currently hold, the appropriateness of the vetting applicant's adverse information must be considered as it would for other applicants.

#### 4. Financial vulnerabilities

Where financial information has been provided in confidence as part of the vetting process, the risk of compromise is significantly reduced. Vetting applicants should be reassured that there is no need to be concerned about mortgage and credit card commitments that are in line with their income, providing they meet these commitments. Debts only become a problem when they are substantial and vetting applicants fail to take remedial action, where they are caused by compulsive behaviour such as gambling or are as a result of criminal activity.

## 4.1. Assessing threat and risk

The vetting process requires assessment of the vetting applicant's financial vulnerabilities, as to whether they have been, are currently or are likely to be in financial difficulty or if they show signs of financial irresponsibility to the extent that they could become vulnerable to financial inducement.

Vetting decision makers should be cognisant of the economic climate and cultural factors that may provide additional context to a vetting applicant's financial circumstances, which can be clarified with them.

Financial vulnerabilities are assessed to differing degrees, depending on the job role and level of vetting clearance required to undertake the roles.

Each application should be assessed using all available information and this should consider:

- the degree of risk presented by the amount and the ability to meet payment commitments
- the force's appetite for risk
- the force counter corruption strategy

When considering the financial vulnerability of vetting applicants, force vetting managers (FVMs) should consider relevant issues, including the following.

- The vetting applicant's openness and/or awareness of their financial situation.
- Whether the role applied for deals with financial matters, such as access to budgets, funds, authorisation of payments, receipts of income or working closely with economic crime units.
- Level of vetting clearance required.
- Whether their financial vulnerability could make them susceptible to financial coercion.
- Whether there are any indications of previous financial unreliability.
- Whether the vetting applicant has problems meeting current financial commitments.
- Whether there are indications of poor financial judgement.
- Whether any potential future financial difficulties have been identified.

- Whether the vetting applicant's spending is inconsistent with their income.
- Whether there is evidence of unexplained affluence.
- Whether the vetting applicant is currently seeking credit. If so, the FVM should look at the number of searches.
- How many new credit accounts the vetting applicant has opened in the last six months and whether these new accounts are already at their limits.
- Whether all credit cards are at or near to their limit. If so, whether the vetting applicant is making minimum payments only and managing on a month-to-month basis, or living off credit and using it for everyday commitments.
- Whether the vetting applicant is overdrawn on their current account or beyond their agreed overdraft limit. If so, whether this is regular (for example, they rely on it to manage).
- Whether there are multiple or repeated arrangements showing on their credit file.
- Whether the credit reference report shows any defaulted accounts or regular late payments on accounts.
- Whether there is any evidence of multiple short-term/payday loans.
- Whether there are any Gone Away Information Network (GAIN) markers on their credit file.
- Whether the vetting applicant is generally meeting commitments but with a poor payment history of missed and late payments.
- Whether the vetting applicant has declared a business interest and whether there are any conflicts of interest.

For MV and NPPV level 3 vetting applications, attention should be paid to the answers given in the additional financial information section. The vetting decision maker should assess the potential for future financial vulnerability, which may make the vetting applicant susceptible to financial coercion. While the vetting applicant may be able to meet credit commitments at the present time, consideration should be given to their ability to continue to meet commitments in the future. The additional scrutiny of a vetting applicant's financial situation is to provide assurance in relation to potential for financial vulnerability when serving in posts with access to sensitive police premises, information, intelligence, financial or operational assets, where:

- the risk of potential compromise of those assets is high
- the risk of serious damage to the force is substantial

The [financial scoring template](#) can be used to assist forces in assessing potential financial vulnerability for MV and NPPV level 3 financial assessments, where required.

## 4.2. Developing a working strategy

Details of developing a working strategy are set out in section [8.5.5](#) of the Vetting APP.

Vetting decision makers should give careful consideration if the vetting applicant has a current individual voluntary arrangement (IVA), whether declared by the vetting applicant or revealed through the credit reference check. Where an IVA repayment plan is in place, the vetting decision maker should satisfy themselves that the vetting applicant has maintained regular payments over a number of months before considering granting clearance. Checks can be made on the [individual insolvency register](#) to obtain details on insolvency cases in the UK, including bankruptcies, debt relief orders and IVAs.

Vetting decision makers should give careful consideration if the vetting applicant declares, or a credit reference check reveals, that they have defaulted on an account. Further information regarding the vetting applicant's financial situation should be requested, to gain greater understanding of the related factors.

Vetting applicants who can show they have adhered, and are adhering to, debt management arrangements may be considered. Documentary evidence should be provided to demonstrate their commitment and adherence to any such debt management arrangements.

Where anomalies are noted between the vetting applicant's declarations and the information provided by the credit reference check, or where there is a need to clarify a particular issue, an [exploratory vetting interview](#) should take place. Areas that could be explored further during the exploratory vetting interview include the following.

- What the debts relate to

- How the unmanageable debts have arisen
- What steps have been put in place to address the current financial situation
- Whether regular repayment agreements have been maintained over a number of months (IVA, debt management plan, direct agreement)
- How the vetting applicant feels about their current financial management (monthly payments versus monthly income)
- With the new role, whether their financial situation will be better or worse
- How substantial the debts are in proportion to affordability
- Whether the applicant has taken remedial action
- Whether the debt was caused by compulsive behaviour, such as gambling
- How they received unexpected funds not normally received through daily activities
- Obtain any reliable documentation for fact checks and future monitoring

Where potential vulnerability is identified in relation to debt, vetting decision makers should assess the affordability of the debt against income. Potential vulnerabilities could also be present where the vetting applicant has unexplained affluence. Advice can be obtained from subject matter experts (such as counter corruption and financial investigation units) where the circumstances provided by the vetting applicant are unfamiliar to the vetting decision maker.

### 4.3. Powers and policy

At the point of entry into the police service, financial checks identify potential vulnerabilities, such as financial difficulties among recruits. [Paragraph 4 of Schedule 1 to the Police Regulations 2003](#) states that a member of a police force shall not wilfully refuse or neglect to discharge any lawful debt. This only applies to police officers, not police staff, special constables or non-police personnel.

Every force should have a policy on unmanageable debt, to further encourage existing police personnel to report their financial difficulties. This is usually owned by the PSD. Forces should have welfare assistance in place to support personnel who are facing debt-related issues.

#### 4.4. Identifying options and contingencies

Depending on the specific circumstances of the case, it is unlikely that clearance will be granted at RV, MV, NPPV level 2 full or NPPV level 3, if the vetting applicant:

- has an outstanding county court judgment
- has been registered bankrupt and three years have not passed since the date from when the bankruptcy was discharged
- has been granted a debt relief order and three years have not passed since the date it was finalised

Former directors of insolvent limited companies who apply for police vetting clearance should be treated as if they were bankrupt even though the debts are in the company name.

Non-police personnel potentially present a greater level of risk. This is due to the fact that non-police personnel, by definition, are not appointed to or employed by the force, so it may not be possible to undertake a more holistic risk management approach involving welfare support and line management. As such, forces should ensure they are satisfied that potential risks are robustly mitigated in their approach to non-police personnel vetting applicants.

If possible, and with the vetting applicant's agreement, the FVM should refer the management of financial vulnerabilities within the workplace through the relevant line manager and welfare support, in accordance with local debt management policies, as opposed to a decision to decline vetting clearance. If the vetting applicant does not consent to such a management process, the FVM should consider declining vetting clearance.

FVMs should not consider a vetting applicant's financial position for existing internal police personnel in isolation. They should take a shared approach involving line managers and welfare, where necessary and where consent is provided, and with appropriate [focused vetting reviews](#) agreed and in place.

When undertaking vetting reviews or renewals, risk is reduced where the vetting applicant openly declares debt-related issues and takes steps to address them. FVMs should clearly document all decisions, including their rationale.

Forces should recognise that a different approach should be taken in regard to financial risk level acceptance with those applying at the point of entry into the police service, compared with those vetting applicants already in the organisation. This is because forces are better placed to risk manage those currently holding vetting clearance, owing to the pre-existing relationship and their history being known to the police service. Where vetting applicants can demonstrate a history of managing their finances with responsibility, integrity and honesty, even if they have experienced debt problems, the final vetting decision can be made proportionately with regard to the vulnerability posed by any debt issue.

Risk mitigation strategies should be explored, to confirm capacity to grant clearance with conditions where financial vulnerabilities have been identified. This should be conducted along with an assessment of trustworthiness of the vetting applicant to provide reassurances of engagement of conditions and reduction of susceptibility to financial coercion.

For vetting applicants requiring national security vetting (NSV) clearance to undertake their role, particular consideration should be made regarding any financial vulnerability and suitability to be awarded or be able to maintain NSV clearance.

Where the vetting process highlights evidence of unexplained affluence for existing internal police personnel and all working strategies have been exhausted but the vetting decision maker's concerns have not been satisfied, a referral to counter corruption should be made.

## 5. Open source

Vetting applicants using social media, or publishing materials in the public domain, will be held to the same standards of behaviour and conduct as would be expected of them offline. This includes acting with integrity and impartiality while upholding fundamental human rights and according equal respect to all persons. Open source enquiries should provide reassurance that the vetting applicant's online behaviour is compatible with the [standards of professional behaviour](#).

While police vetting open source enquiries only entail checks on publicly available materials, where evidence is submitted to the FVU regarding information published on a private forum or on social media with privacy restrictions, it will be considered

intelligence. For existing police personnel, any evidence of concern that may amount to misconduct must be passed to the PSD.

## 5.1. Assessing threat and risk

When assessing threat and risk regarding the results of open source enquiries, the following can be included to assist the assessment, depending on the context of the information.

- What public information is available in regard to the vetting applicant?
- Have the open source enquiries shown the vetting applicant uses social media responsibly and safely?
- If the vetting applicant is shown as a director on [Companies House](#), have they declared their business interest, or advised of plans to cease this activity on recruitment?
- Is there any adverse information regarding the vetting applicant on any professional registers, where they have revealed a current or previous relevant profession, such as any of the [healthcare regulators](#) or [legal professional registers](#)?
- Are there any adverse news reports relating to the vetting applicant?
- Is there any evidence of improper or inappropriate online activities, such as discriminatory, abusive, misogynistic, oppressive, harassing, bullying, victimising, offensive publications by the vetting applicant, or evidence of their support or sharing of such materials published by others?
- What was the age of the vetting applicant and how much time has passed since the activity took place?
- What sites did the activity take place on?
- Was the vetting applicant personally identifiable?
- Is a pattern of concerning behaviour evident through the open-source enquiries?
- Are there any personal security concerns associated with the vetting applicant's online activity?

- Has the vetting applicant published any material that might undermine their reputation or that of the policing profession, or might run the risk of damaging public confidence in the police service?
- Have the open source checks revealed any undisclosed information, required to be provided as part of the vetting process?

## 5.2. Developing a working strategy

Details of developing a working strategy are set out in section [8.5.5](#) of the Vetting APP.

Information of concern identified through open source enquiries should be recorded as evidence to present to the vetting applicant at an [exploratory vetting interview](#).

The FVM should seek advice from subject matter experts (such as digital investigators and analysts, counter corruption unit and PSD) where there are ambiguities relating to the context or content of certain materials identified, ensuring they have a good understanding of the information.

In cases where concerning information has been found, relating to existing police personnel, the information discovered should be passed to the PSD.

## 5.3. Powers and policy

Details of powers and policies are set out in section [8.6](#) of the Vetting APP.

## 5.4. Identifying options and contingencies

Open source enquiries should provide a reassurance that the vetting applicant's online behaviour is compatible with the [standards of professional behaviour](#).

The vetting decision maker should consider the severity of the behaviour uncovered through open source enquiries, the vetting applicant's understanding and acceptance of their own personal security responsibility, alongside any reasonable [risk mitigation strategies](#) that can effectively manage the risks identified, such as continual monitoring of their open source activities.

Any evidence of racist, sexist, homophobic or other discriminatory language, behaviour, harassment or bullying would be incompatible with the expected [standards of professional behaviour](#).

The vetting decision maker should consider whether there are any other compounding factors that could increase the vetting applicant's vulnerability to harassment, corruption or blackmail.

## 6. Associations

When information about an individual associated with the vetting applicant has been supplied or identified during the vetting process, they are known as a third party. This can include:

- parents
- partners
- former or ex-partners
- siblings
- children
- extended family
- partner's extended family
- co-residents
- friends
- an associate known to police, including individuals with whom they have significant financial arrangements, such as business partners or those who make child support payments
- associates in professions which could create a conflict of interest, for example, private investigators, journalists, defence legal teams or those involved in tendering or bidding for police contracts.

### 6.1. Assessing threat and risk

Where adverse information relating to a third party is revealed, consideration must be given to the risk this information poses to the force, the vetting applicant and the public. If there is potential risk from third parties, forces must consider these cases on their individual merits.

The vetting applicant's associated third parties will need to be assessed for threat and risk if they have convictions or cautions for recordable offences, or there is

intelligence suggesting involvement in criminal activity. The following should be considered:

- the nature of the relationship
- the openness of the vetting applicant or likelihood of awareness
- how recent the police interest was
- any evidence of distance between the vetting applicant and the associate
- any financial relationship
- the likelihood of the vetting applicant coming across the third party or requiring them to handle their information in their job role
- the likelihood that the vetting applicant's performance of duty may be adversely affected, for example through adverse pressure or a conflict of interest
- the nature, location, number and seriousness of the offences or involvement in criminal activity, as well as the time period over which these took place
- the likelihood of damage to the force's operational capability
- the potential for information leakage
- whether the circumstances are likely to bring discredit to, or embarrass, the police service or police force
- whether there are any impending prosecutions or ongoing investigations that may require monitoring
- any other factors relating to the vetting file that could increase the susceptibility of corruption or coercion

## 6.2. Developing a working strategy

Details of developing a working strategy are set out in section [8.5.5](#) of the Vetting APP.

Risk mitigation strategies should be explored with other appropriate departments (see section [8.7.2](#) of the Vetting APP) who may be able to assist with risk management activities, such as periodic system auditing, proportionately restricting systems access, facilitating geographical or departmental restrictions, making a disclosure to the head of department, providing specific risk management and welfare advice or exploring options openly with the vetting applicant.

Where further information is required to ensure the relevant considerations have been sufficiently explored, an [exploratory vetting interview](#) should be arranged to obtain as much information as the vetting applicant can or is willing to provide.

### 6.3. Powers and policy

Details of powers and policies are set out in section [8.6](#) of the Vetting APP.

Powers and policies that might be considered include, but are not limited to, the following.

- [Freedom of Information Act 2000 \(FOIA\)](#)
- [Data Protection Act 2018 \(DPA\)](#)
- [Computer Misuse Act 1990](#)
- Local notifiable associations policy (see next section)

### 6.4. Identifying options and contingencies

Details of options and contingencies are set out in section [8.7](#) of the Vetting APP.

Where vetting clearance is granted with known potential risks relating to third parties, forces should act in accordance with their local notifiable associations policy and consider the requirement for a notifiable associate report to be submitted.

Each case must be decided on its own merits, taking all relevant information into account. The following factors should be considered when deciding to grant or decline vetting clearance.

#### 6.4.1. Factors against granting clearance

- There is evidence of joint enterprise.
- The third party's convictions or cautions are of a serious nature, recent, operationally significant, committed closely to, or within the force area, and/or associated to wider criminality.
- Intelligence regarding the third party is reliable, significant, recent and/or could compromise operational policing, the vetting applicant or police assets.
- The nature of the relationship between the vetting applicant and the third party is close through an emotional or social connection and/or they reside in close proximity.

- There is a financial relationship between the vetting applicant and the third party.
- Due to the vetting applicant's lack of awareness or non-disclosure, and the [Data Protection Act 2018](#), there is an inability to openly discuss risk factors to support [risk mitigation strategies](#).
- The vetting applicant has not engaged with their duty to notify the FVU of a change of circumstance or other information that would impact on their vetting clearance, or any subsequent efforts to progress with any vetting review(s) or renewal processes.

#### 6.4.2. Factors supporting granting clearance

- There is evidence of distance between the vetting applicant and the third party.
- The third party's convictions or cautions were minor offences, they were not recent, they were not within the force area, they were not operationally significant and/or there are mitigating circumstances.
- The intelligence relating to the third party has low reliability, was not recent, was not related to criminality and/or would not compromise operational policing, the vetting applicant or police assets.
- The vetting applicant has been open throughout the vetting process, and/or there is a high likelihood the vetting applicant would be unaware of the third party's activity.
- The force has a reassuring service history of the vetting applicant through their previous service, and has demonstrated commitment to report their duty-bound notifiable matters.

A decision that the vetting applicant should be declined clearance on the basis of a family member's convictions, intelligence material or the vetting applicant's criminal associations must be made by the FVM or their nominated representative(s). The results of checks on family members and associates must not be disclosed to the vetting applicant. However, when considering what information about a third party may be disclosed, the FVU should assess the information available in the public domain to allow as full disclosure as possible. See [6.3.2](#) and [Appendix F](#).

## 7. National security or terrorism concerns

National security or terrorism concerns should not be addressed independently through the police vetting process. Where such concerns have been identified, the relevant department or agency must be notified immediately.

In some cases, it may be that such data is not openly shared with the FVU, but expert guidance may be given regarding the appropriateness of granting clearance to the vetting applicant.

It is highly unlikely a disclosure will be made to the vetting applicant, unless it is deemed that an association presents an immediate risk to them by the expert authority. Such disclosures would be facilitated either by the relevant authority or collaboratively with the FVM.

Cases presenting current national security or terrorism concerns are unlikely to be afforded any risk mitigation strategies that could support a level of police vetting clearance. The sensitivity of these cases must be considered extremely carefully, seeking support from suitable subject matter experts.

For existing police personnel and anyone working for the police service under contract, if the FVU becomes aware of adverse information relating to national security vetting, a [vetting review](#) will take place to determine the current vetting clearance holder's suitability to maintain their clearance and consideration will be given to withdrawing the NSV clearance (see [national security vetting appeals procedure](#)).

## 8. Professional standards history

Previous serving police personnel who are currently on the police barred list cannot be employed or appointed by the police service and are not eligible for RV or MV clearance. They are also unable to become a police volunteer, or be employed as a contractor where their role will involve the exercise of relevant public functions. Suitability for vetting clearance for all other non-police personnel applicants should be assessed on a case-by-case basis, considering the nature of the misconduct which led to the dismissal, the level of vetting, and the role being applied for.

In recognition of additional information sources for those with current or previous police service history, it is appropriate for the vetting decision maker to be satisfied

that there is no reasonable basis to question the integrity of the vetting applicant and that there are no outstanding complaints or matters under investigation (see [transferees](#) and [those with previous police service](#) and [transfer or other movement between forces during, or after, professional standards investigations](#)).

Similar assessments can be made on a vetting applicant's military conduct history, where required.

## 8.1. Assessing threat and risk

Where applicable, the vetting applicant's previous complaints and discipline history and any counter corruption intelligence received should be reviewed.

The following should be considered:

- live investigations
- the role vetting is being conducted for
- outcomes or determinations of complaint and misconduct investigations
- nature of the misconduct or complaints
- period of time passed
- patterns of behaviour
- abuse of position or sexual harassment indicators
- integrity concerns

Factors requiring particular scrutiny may include:

- significant adverse complaint or conduct history
- probationary constables discharged from the police service under Regulation 13
- previous breaches of the [standards of professional behaviour](#)
- adverse counter corruption intelligence
- past infringement of security or vetting policy or procedures
- inability to demonstrate the ethical principles or evidence of unsatisfactory professional or ethical behaviour as described in the [Code of Ethics](#)
- evidence of police-perpetrated domestic abuse

- significant or repeated performance matters
- other inappropriate behaviour that impinges on a person's suitability to serve in the role

## 8.2. Developing a working strategy

Details of developing a working strategy are set out in section [8.5.5](#) of the Vetting APP.

In cases where the professional standards history is being provided to the receiving force and limited information has been provided, the FVU must request further details to assist with the assessment.

If the nature of the information held by the parent force requires specific handling conditions, this should be arranged as soon as possible through suitable channels. Where information is held by the parent force, but not shared with the receiving force, a statement should be provided with the context and rationale, keeping in mind the policing purpose of the vetting process to protect the public, as well as police assets. For further information, see [Appendix F](#).

In the case of a live misconduct investigation, the parent force should share the severity assessment with the receiving force. This will allow the PSD in the receiving force to review it and understand any risks.

Where a vetting applicant is shown on the police advisory list, further information should be requested from the reporting force's PSD.

For further information, see [risk mitigation strategies](#).

Other working strategies could include:

- discussing investigations of concern with the vetting applicant
- requesting a supervisor appraisal
- discussing the case with the head of professional standards or other appropriate authority
- requesting a copy of the severity assessment for live misconduct investigations, to be reviewed by appropriate professional standards personnel for guidance to understand the risk

- exploring potential risk mitigation strategies (see section [8.7.2.c](#) of the Vetting APP)

### 8.3. Powers and policy

Details of powers and policies are set out in section [8.6](#) of the Vetting APP.

Powers and policies that might be considered include, but are not limited to:

- [Criminal Procedure and Investigations Act 1996 \(CPIA\)](#)
- [NPPC and College of Policing – Guidance on professional boundaries](#)

### 8.4. Identifying options and contingencies

Details of options and contingencies are set out in section [8.7](#) of the Vetting APP.

When making assessments on a vetting applicant's professional standards history, proportionality must be considered, taking into account all relevant factors and the reliability of the information alongside the appropriateness of the vetting applicant holding a level of police vetting clearance.

Where the vetting applicant is subject to a live investigation, the receiving force should carefully consider the implications should the vetting applicant receive a sanction, as well as the requirements to be available for a hearing. It is recognised, however, there are cases that have a significantly extended investigation period and the serving police personnel may be subject to the investigation due to minor involvement. In such cases, a pragmatic and proportionate assessment should be made.

Options that could be considered as risk mitigation strategies for adverse professional standards history (if not already proscribed by professional standards) could include:

- role restrictions
- regular focused reviews
- regular reporting requirement to the FVU
- other methods of monitoring through professional standards that are available and reasonable to implement

The decision maker should consider factors and requirements previously mentioned under:

- **return following dismissal**
- **transferees** and **those with previous police service**
- **transfer or other movement between forces during, or after, professional standards investigations**
- **renewing police vetting clearances**
- **reviewing vetting clearance following misconduct**

## Appendix O – Rehabilitation of Offenders Act guidance for decision makers

### **Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (2013 and 2020)**

The above Exceptions Order introduced protected convictions and cautions. It distinguishes between the treatment of the roles of police officers and police staff.

Police officer and special constable vetting applicants are exempt from the Rehabilitation of Offenders Act 1974 and are required to disclose all convictions and cautions with no exceptions. All such offences can be taken into consideration in police vetting decision making.

### **Police staff and non-police personnel vetting applicants**

The table below provides the criteria for protected convictions and cautions. These do not have to be declared by police staff and non-police personnel vetting applicants and they cannot be taken into consideration in police vetting decision making.

Under the **Rehabilitation of Offenders Act 1974 (ROA)**, eligible convictions or cautions become spent after a specified period of time, known as the rehabilitation period. Police staff and non-police personnel vetting applicants do still have to declare previous convictions and cautions which, under the Rehabilitation of Offenders Act 1974, would ordinarily be considered as spent but are not protected.

**Note:** When a conviction or caution is ‘spent’, it will no longer appear on basic barred and disclosure and criminal record checks.

The government website provides guidance on **rehabilitation periods**.

<b>Protected convictions</b>		<b>Protected cautions</b>	
A conviction is considered to be protected if all the following criteria apply:		A caution is considered to be protected if all the following criteria apply:	
It is not for a listed offence* under section 2A(5) of the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975		<b>Aged under 18 at the time</b>  Immediately protected	
No custodial sentence was imposed			
<b>Aged 18 or older at the time</b>  11 years or more have passed since the conviction	<b>Aged under 18 at the time</b>  Five years and six months or more have passed since the conviction		

**\*Listed offences include serious, violent and sexual offences, and offences that are of specific relevance to the safeguarding of children and vulnerable adults.**

## Appendix P – Sample financial scoring sheet

Review and assessment of personal finances

**Note:** this scoresheet should be used as a guide only. Decisions still have to be reached on a case-by-case basis, taking all relevant information into consideration.

**Name:**

**Force no:**

### Area 1

	Column 1A			Column 1B			Column 11	
	Question 10.24			If 10.24 = Y (YES) then show 5				
	Problem (question)	Show number of occurrences in each of the categories below		Date of occurrence				
				Occurrences in the last five years scores 5 for each occurrence	More than five years ago scores 2 for each occurrence			
9.3	Cards withdrawn		×	5	2	=		+
9.5	County court judgement		×	5	2	=		+
9.5	Attachment of earnings		×	5	2	=		+
9.5	Repossession proceedings		×	5	2	=		+

9.6	Loans terminated		×	5	2	=		+
9.9	Debt management plan		×	5	2	=		+
9.10	Individual voluntary agreement		×	5	2	=		+
					Total area 1			

## Area 2

	Qu.	Column 1		Column 1B	
Commitments	10.15		(Divide 10.15 by 10.10)		
Income	10.10				
Sub-total	=		×10	=	+
			If 10.6.4 = Y, score 1		+
			If 10.25 = Y= 'much more', score 1		+
			If 10.22 = Y, score 1		+

	Qu.	Column 1			Column 1B	
			If 10.22.1 = Y, score 1			-
			If 10.17 is greater than or equal to £2,500, deduct 3			
			Sub-total	=		
			Total area 2			

### Area 3

		Column 1				Column 1B	
Loan debt	10.19.2		+		(show outstanding totals)		
Credit outstanding	10.20.3		+				
Overdraft	10.23		+				
Outstanding bills	10.24.1		+				
Total debt	=		+		(divide total debt by income to obtain the debt/income ratio)		
Income	10.10						

		Column 1				Column 1B	
Debt/income ratio (R)		(R)			If R is less than 5, then score 0; if R is between 5 and 10, then score 1; if R is 10 or more, then score 3.		
					If 10.6.3 = Y, score 1		
					If 10.19.5 = Y, score 1		
					If 10.19.6 is 'holidays', score 1		
					If 10.19.6 is 'debt repayment', score 1		
					If 10.19.6 is 'stocks and shares', score 1		
					If 10.19.6 is 'bridging finance', score 1		
					If 10.19.6 is 'general expenses', score 1		
					Sub-total		

		Column 1				Column 1B	
Number of loans	10.19.1		+				
Number of credit arrangements	10.20.1		+				
Number of accounts	10.21		+				
Total accounts (T)		(T)			If T is greater than 10, score 1		+
					Total area 2		
Area 1		Area 2			Sum of area 1 + area 2 + area 3		

Summary name:

Force number:

A) Where total is below 12, proceed to Area 5.

B) Where total is between 12 and 15, proceed to Area 4.

C) Where total is over 15, one of the areas already reviewed will have indicated the need for an interview with the individual. Before conducting an interview, the assessor should proceed to analyse Areas 5 and 6 to highlight any other financial problems.

## Area 4 – Potential for future financial difficulties

Further consideration is required for any of the following:

- 10.11 is yes (overtime or bonus payments) (the household is dependent on temporary payments)

- 10.4 (shows the **vetting applicant** is likely to be **slightly** or **much more worse off** in the future)

## Area 5 – Assets possibly inconsistent with income

Further consideration is required for any of the following:

- 10.17 (savings and investment) is more than £50,000
- 10.17 is greater than £25,000 and 10.16 is occasionally or hardly ever
- 10.17 is greater than £25,000 and 10.18 is no

## Area 6 – Potential conflicts of interest

Conflicts of interest will need to be dealt with on a case-by-case basis.

## Appendix Q – Glossary

**ACRO** – ACRO Criminal Records Office. The [national office](#) which manages criminal record information and the exchange of records with other countries. One of the services it provides is to check whether a suspect in the UK has criminal convictions in other countries.

**Adverse information** – any information that, if assessed, would clearly lead to the requirement for a vetting review as there is an identified risk that requires managing or mitigating. Examples include, but are not limited to:

- information that suggests a compromise to the protection of the public
- police contact as a suspect
- poor or deteriorating personal financial management
- misconduct investigation as the subject
- close associate having negative police contact
- unsatisfactory supervisor statement
- intelligence suggesting wrongdoing
- concerns over standards of behaviour or attitudes

**[Annual integrity and vetting review](#)** – the Counter Corruption APP (official-sensitive) is only available to counter corruption professionals via the Knowledge Hub – it requires annual integrity checks to be undertaken. This APP requires annual checks to be taken in relation to any change of circumstances that may affect vetting clearance. These requirements have some overlap as part of the wider security regime and have been combined into a single process, whereby the individual and their supervisor must have an annual conversation to identify any risks or potential change of circumstances that may pose a security risk or impact on a vetting clearance. These may require escalation to consider any risk management that may be required. This process does not negate the ongoing personal responsibility of everyone holding police vetting to proactively report any risk or change of circumstances.

**Annual security appraisal** – this is a requirement set for certain [national security vetting clearances](#).

**Association** – in the context of police vetting, associating with another person is:

- meeting or uniting for a common purpose
- keeping company or being familiar
- being an ally, confederate, partner or colleague
- having an acquaintance, friendship, relationship, intimacy or connection

and/or

- being a member of a group, organisation or society that is formed for the promotion of a common object or objects

An association would include communicating via phone, social media and other forms of communication, not just in person.

**Baseline personnel security standards (BPSS)** – this document provides guidance on the pre-employment screening of civil servants, members of the armed forces, temporary staff and government contractors. It describes the controls required to address the problems of identity fraud, illegal working and deception generally. As well as posing serious risks to reputation, integrity and financial assets, these issues may also be indicators of more serious national security concerns. Failure to address these problems could lead to reputational or more serious damage to the police service or business of government. It should be remembered that without adequate confirmation of identity, any subsequent vetting clearance offers no assurance.

The standards relating to pre-employment are detailed on [GOV.UK](https://www.gov.uk).

**Chief officer rank** – for UK police forces, this includes ranks of assistant chief constable and above. For the Metropolitan Police and City of London Police, this includes ranks of commander and above.

**Conflict of interest** – an individual's personal interest(s) or relationship(s) that could compromise their professional judgement, decisions or actions.

**Deputy chief constable (DCC)** – the equivalent ranks in the Metropolitan Police and the City of London Police are accepted and are defined as 'deputy assistant commissioner' and 'assistant commissioner' respectively.

**Focused vetting review** – the focused vetting review allows vetting units to undertake reviews throughout the clearance validation period, reacting to any change of circumstances or as part of risk management activities. Focused vetting reviews allow vetting units to ensure they have up-to-date and accurate information relating to the vetting applicant, maintaining the validity and monitoring any potential risks as a continual process. Any focused vetting review will be in proportion to the nature of the information received and is not a prescribed set of checks like the full vetting review. Where the information provided does not impact an individual's vetting clearance, the focused vetting review may consist only of a record of the information being received and the decision that no further review is required.

**Focused vetting reviews as part of risk mitigation strategies** – where risks have been identified and ongoing risk management activities have been agreed to be undertaken within set periods.

**Full vetting review** – this is a review of an individual's vetting clearance that should take place for specific events within a clearance period. The minimum checks that should be undertaken are prescribed, regardless of the information received (previously referred to as vetting health checks).

**Gone Away Information Network (GAIN)** – a marker that is shared across financial networks that an individual has moved and left behind a credit agreement that is in arrears without giving the company a forwarding address.

**Individual who is independent** – this relates to appeal panel members who are described to be individuals who are independent of policing, referring to those who are not employed or appointed by the police service. The intention is to bring a differing perspective to challenge, scrutinise and/or endorse the local police process, such as a committee representative or an individual from another agency or industry.

**Information leakage** – a common term for police information being passed on to individuals to whom it shouldn't be passed on.

**Joint enterprise** – an English common law term which sets out that if you are seen to be involved in the commission of a crime, you could be seen to be equally as guilty as the person who has committed it. If your knowledge, your presence or your actions indicate that you have played a part in a crime under '[joint enterprise](#)', you could be convicted of the same crime as the principal offender.

**Knowledge Hub** – a national platform created by the Police Digital Service for UK policing to facilitate information sharing and encourage greater collaboration. This site is not publicly accessible.

**Material change** – an event, occurrence, change in conditions or circumstances or other change that results in or could reasonably be foreseen to have an effect on a vetting clearance or risk assessment.

**Parent force** – the force where the officer or staff member is currently serving (or previously served).

**Police assets** – this term covers a wide scope of assets owned by or the responsibility of the police such as premises, information, intelligence, financial or operational assets, corporate databases and data networks or hard-copy material.

**Police personnel** – individuals appointed to or employed by police forces, for example police officers, police staff and members of the Special Constabulary.

**Procedural fairness** – the theory of procedural justice which highlights the importance of helping people to feel they are treated in a procedurally fair and just way.

**Protected characteristics** – under the Equality Act 2010, all employers are under a statutory duty not to directly or indirectly discriminate against anyone who possesses a protected characteristic. The Act provides a legal framework to protect the rights of individuals and advance equality for all. There are nine characteristics that are protected under the Act:

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation

**Rebuttable presumption** – this term is used where there is an expectation that vetting clearance will be declined based on the criteria explained. However, if there are factors that legally override that expectation or there are circumstances presented that strongly support vetting clearance, it may be granted.

**Receiving force** – the force that the officer or staff member has applied to for vetting clearance.

**Secondment** – For the purposes of this APP, secondment refers to police officers or police staff being seconded to another force or agency outside of their parent force. It does not refer to any in-force arrangements (more often referred to as an attachment), which may be referred to as secondments locally.

**Service confidence procedure** – the purpose of this procedure is to provide forces with an ethical framework for dealing with staff who present a significant risk of compromise to the organisation. The risk must be based on lawfully obtained intelligence or information, and in circumstances where other procedures to address the risk are not available to the force.

**Underrepresented** – police forces have captured, measured and reviewed their workforce for several decades. This activity provides the service with vast amounts of information about the people it employs across the service, including the demographics. This can indicate the further work needed – for example, to make sure the service reflects the local communities it serves – and can also increase diversity of experiences and thought that can improve service delivery and workplace culture.

Analysis of Home Office police workforce data can illustrate that certain groups have disproportionately lower participation and are more likely to be insufficiently represented in certain ranks, bands and roles in policing. We categorise these groups as being underrepresented.

In all circumstances, data must be used to explain underrepresentation, different needs and disadvantage, and to justify any positive action to address these areas of concern. Certain people or groups must not be treated more favourably than others in the name of positive action. Positive action should be delivered on a case-by-case basis. Taking positive action must be a proportionate means of enabling or encouraging people to overcome the disadvantage or to take part in the activity.

Lastly, forces must ensure that every person in their workforce is made aware of positive action and why this exists. This will help to promote positive action across teams and departments, including allyship or buddy schemes for any positive action initiative, and will also challenge any misconceptions about it.

**Vetting applicant** – the individual who requires police vetting clearance and is the subject of relevant enquiries. Vetting applicants can be external to the organisation, either as new vetting applicants to the police force, transferees or non-police personnel. They can be internal in the organisation, such as existing clearance holders, either requiring a vetting review, renewal or an alternative level of clearance. In addition, the vetting applicant can be ‘posted’ police personnel covered by a regional 22a agreement, where the ‘posted’ individual would be under the direction and control of the chief constable of the hosting force during the period of their posting.

**Vetting renewal** – the process of a new vetting application form being completed for the current level of vetting the vetting applicant requires at the end of the clearance validation period.

**Vetting review** – reviews undertaken throughout an individual’s clearance period to assess newly identified risks that may be present following a change of circumstances. This process will determine an individual’s ability to maintain vetting clearance. Activities undertaken in a vetting review should be adapted to the requirements of the notification received. (Previously known as aftercare, this is terminology that has been discontinued in the APP on vetting. Aftercare is instead referred to as vetting reviews, such as full vetting reviews or focused vetting reviews, depending on the circumstances).

**Vetting clearance** – the decision to award a vetting clearance level applied for. The vetting applicant now holds vetting clearance for the specified period, subject to continuous integrity and vetting reviews.

**Vetting declined** – the decision not to award a vetting clearance level applied for, as a result of information identifying a risk that cannot be reasonably managed or mitigated.

**Vetting suspended** – the decision that a vetting clearance is temporarily suspended and the individual does not hold a valid vetting clearance during this period. This is

applied in circumstances where a risk is being assessed that is so significant that the only effective risk management or mitigation is to suspend the vetting clearance until the outcome of the assessment is known.

**Vetting terminated** – a vetting clearance must be terminated once it is no longer required, expires or is withdrawn. This may be at any point during the lifetime of the clearance or on expiry.

**Vetting withdrawn** – following a change of circumstance or adverse information, a decision has been made that the vetting clearance can no longer be held, as a result of risk that cannot be reasonably managed or mitigated, prior to the normal renewal period or upon renewal.

**Violence against women and girls (VAWG)** – acts of violence or abuse that are known to disproportionately affect women and girls. VAWG encompasses offences including domestic abuse, rape and serious sexual offences, child sexual abuse and exploitation – for female victims aged 10 years and over (in line with the NPCC VAWG definition which incorporates victims aged 10+), modern slavery and human trafficking, honour-based abuse, stalking and harassment, adult sexual exploitation and sex work, tech-enabled VAWG including online harassment, spiking and VAWG in different spaces: public, private and in places of education.

**Vulnerable** – **a person is vulnerable if, as a result of their situation or circumstances, they are unable to take care or protect themselves or others from harm or exploitation.**

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## About the College

We're the professional body for the police service in England and Wales.

Working together with everyone in policing, we share the skills and knowledge officers and staff need to prevent crime and keep people safe.

We set the standards in policing to build and preserve public trust and we help those in policing develop the expertise needed to meet the demands of today and prepare for the challenges of the future.

**[college.police.uk](https://college.police.uk)**