



Sussex Police & Crime Commissioner

To:	The Sussex Police & Crime Panel.
From:	The Sussex Police & Crime Commissioner.
Subject:	The role of the Sussex Police & Crime Commissioner in ensuring the effectiveness of vetting processes within Sussex Police.
Date:	3 July 2025.
Recommendation:	That the Sussex Police & Crime Panel note the report.

1.0 Introduction

- 1.1 This report sets out the role of the Sussex Police & Crime Commissioner (PCC) in holding Sussex Police to account for the effectiveness of the vetting standards and processes used within Sussex Police.
- 1.2 The report provides an outline of the purpose of vetting; guidance and procedures for vetting; types of vetting; decision-making for vetting; considerations around convictions and cautions; oversight and accountability for vetting and the role of the PCC in this process in terms of holding the Chief Constable to account.
- 1.3 The report also sets out some of the further reforms to the police dismissal system that were formally announced in April 2025.

2.0 The purpose of vetting

- 2.1 It is imperative that all individuals in the police service in England and Wales maintain the highest ethical and professional standards and act with the utmost integrity. This position is crucial in terms of ensuring that only those who are suitable can join, and remain in, policing and that trust and confidence in the service is maintained.
- 2.2 It is essential that members of the public are confident that police vetting standards and processes for all potential and serving police officers and staff are robust and effective in identifying those individuals who pose a potential risk to others and/or those who are otherwise unsuitable to work within the police service. It is also fundamental that those working in policing are also able to maintain the trust and confidence of their individual chief constable to perform their role and deliver policing services.
- 2.3 Police vetting is conducted across all police forces nationally to identify, assess and manage risk relating to the following areas:
 - corruption and coercion
 - integrity
 - leadership
 - national security
 - operational safety
 - protection of police and/or organisational assets
 - public safety
 - public trust and confidence

- 2.4 Undertaking consistent and effective vetting assists all police forces to identify those individuals who may be unsuitable to work in, and remain in, the police service and/or who have access to police or organisational assets. This can include individuals who:
- are unsuitable through criminal activity or association
 - pose a risk to members of the public and to those who are vulnerable
 - have a demonstrable lack of honesty
 - have previously behaved in a manner that is inconsistent with the standards of professional behaviour expected
 - are financially vulnerable
 - lack the necessary maturity and/or self-control, even if their integrity is not in question

3.0 Vetting Code of Practice and Vetting Authorised Professional Practice

- 3.1 The Vetting Code of Practice – developed by the College of Policing – sets out the expectations of chief officers in relation to vetting, which are to be applied by all police force areas in England and Wales.
- 3.2 This code was developed to help achieve, implement and maintain the national standards, as set out in the supporting authorised professional practice (APP) for vetting, and to ensure that those standards are consistently applied across the police service.
- 3.3 Vetting units in each police force must have a nominated Force Vetting Manager or equivalent who has the delegated authority of the chief constable to grant, decline and/or withdraw vetting clearances relevant to their force or area. The Force Vetting Manager must deliver the expectations set out in the Vetting Code of Practice on behalf of their chief constable and comply with the standards set out in the vetting APP.
- 3.4 These arrangements may also be delivered collaboratively with other police forces. This is the position for Sussex Police and Surrey Police, with a Joint Force Vetting Unit (JFVU) established in September 2016 to undertake these functions on behalf of both forces.
- 3.5 Further information about the Vetting Code of Practice and Vetting Authorised Professional Practice can be viewed through the following links:

3.5.1 Vetting Code of Practice

<https://www.college.police.uk/guidance/vetting-code-practice>

3.5.2 Vetting Authorised Professional Practice

<https://assets.college.police.uk/s3fs-public/2024-12/Vetting-authorised-professional-practice.pdf>

4.0 Types of vetting

4.1 There are currently three different types of vetting used by the police service in England and Wales: recruitment vetting; management vetting and non-police personnel vetting, as follows:

4.2 Recruitment Vetting

4.2.1 Recruitment vetting (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. This type of vetting allows unsupervised access to the police estate and any information required to perform these roles.

4.2.2 This level of vetting assesses whether individuals pose an unacceptable and/or identifiable threat to the trust and confidence of the public in, and reputation of, policing. If RV clearance is granted, this allows individuals to have regular access to police assets, materials and information up to 'official-sensitive' on the Government Classification Scheme (GCS).

4.3 Management Vetting

4.3.1 The purpose of management vetting (MV) is to provide additional assurance when assessing the integrity, reliability and potential for financial vulnerability of vetting applicants. This level of vetting is required for those police officers and staff in posts that require access to sensitive police premises, information, intelligence, financial or operational assets, where:

- the risk of potential compromise of those assets is high, and/or
- the risk of serious damage to the force is substantial

4.3.2 All police personnel with long-term, frequent and uncontrolled access to 'secret' police assets, and occasional access to 'top secret' police assets, as defined by the Government Classification Scheme, should hold MV clearance.

4.3.3 MV is a prerequisite level of clearance for police personnel who require Security Check (SC) vetting [for access to classified information] or Developed Vetting (DV) which is the most comprehensive level of security clearance in the United Kingdom. If MV clearance cannot be obtained, National Security Vetting (NSV) clearance cannot be granted.

4.4 Non-Police Personnel Vetting

4.4.1 Non-police personnel vetting (NPPV) is applied to anyone other than police officers, police staff and special constables who require a level of police vetting clearance.

4.4.2 NPPV vetting has four separate levels: NPPV 1; NPPV 2 [Abbreviated]; NPPV 2 [Full] and NPPV 3, as follows:

- NPPV 1 – This clearance allows unescorted access to non-sensitive police premises, but no access to classified information. For example, this level of vetting would be granted for plumbers, vehicle recovery operators and removal personnel.

- NPPV 2 [Abbreviated] – This clearance allows regular, unescorted access to non-sensitive police premises. It allows routine access to police materials and information up to 'official-sensitive' on the GCS, either on police premises or by remote access. This level of clearance is not sufficient to allow access to police systems.
- NPPV 2 [Full] – This clearance allows regular, unescorted access to non-sensitive police premises and unsupervised access to police systems required as part of the role. This level of clearance allows routine access to police materials and information classified up to 'official-sensitive' on the GCS, with occasional access to documents classified as 'secret'.
- NPPV 3 – This clearance allows regular unescorted access to sensitive police premises and unsupervised access to police systems required as part of the role. This level of clearance allows access to police materials and information classified up to 'secret' on the GCS, with occasional access to documents classified as 'top secret'.

5.0 Decision-making for vetting

- 5.1 All police vetting decisions in England and Wales are made in accordance with the following:
- ✓ National Decision Model [used for making all decisions in policing]
 - ✓ Vetting Code of Practice
 - ✓ Vetting Authorised Professional Practice
 - ✓ Standards of Professional Behaviour [set out in Schedule 2 of the Police (Conduct) Regulations 2020]
 - ✓ Code of Ethics [supported by the Code of Practice for Ethical Policing]
- 5.2 There are several mandatory basic checks that are undertaken for all police officers, staff and volunteers before they commence employment with the Force. These consist of extensive checks on application including crime system and crime report allegation checks; credit reference checks [to consider any potential vulnerability from a financial perspective]; open-source enquiries [on search engines and social media sites]; review of voting registers; checks with the Ministry of Defence and Criminal Records Office; checks into other professional standards and vetting databases, and employment checks [with previous police force areas, where appropriate].
- 5.3 Further checks are also undertaken on the Police National Computer, Police National Database and by the Counter Terrorism Unit in respect of the partners, family, associates and co-habitants [aged 10 years old and over] of all individual applicants.
- 5.4 Many of these checks are repeated and/or additional vetting is undertaken should any changes be made to a role an individual is performing as part of any internal movement in respect of access to vulnerable individuals, systems and/or sensitive information. The level of vetting should remain proportionate to the role that an individual is performing and the information that they have access to.

- 5.5 Police vetting decisions are made once all the necessary information and intelligence has been gathered and considered to enable informed, balanced and proportionate decisions to be taken in a consistent manner.
- 5.6 In assessing risk and vulnerability, decision makers must consider all possible threats, their likelihood and potential impact. Where potential threats are identified, these are, typically, associated vulnerabilities. The level of vulnerability will be case-specific and will depend on the individual circumstances of the applicant.
- 5.7 There is a three-tier system for decision-making responsibility within the JFVU, as follows:
- Tier 1 – Vetting caseworkers make decisions for low-risk cases
 - Tier 2 – Vetting supervisors make decisions for medium- and high-risk cases
 - Tier 3 – Force Vetting Manager makes decisions for all vetting appeals
- 5.8 All vetting decisions are formally recorded on a standard decision template and saved within the vetting file. This activity should be continuously appraised on a regular basis to ensure that it remains current and accurate.

6.0 Considerations around convictions and cautions

- 6.1 The vetting APP has a rebuttable presumption that individuals with convictions and cautions are likely to have their vetting applications declined.
- 6.2 Each case must be considered on its individual merits in relation to the role being undertaken and/or the police assets or information being accessed. This process will include the consideration of factors such as the type of offence, outcome, length of time that has passed and the age of the applicant at the time the offence occurred.
- 6.3 The JFVU uses standard national guidance to assist in their decision-making around convictions and cautions. Offences where any of the following practices or characteristics are present will also, most likely, result in the vetting application being declined:
- dishonest or corrupt practices
 - relates to violence
 - involves a contact or non-contact sexual offence
 - demonstrates targeting of persons due to their vulnerabilities and/or protected characteristics
 - evidence of violence, intimidation, harassment, discrimination, racism, homophobia and/or disablism
 - evidence of violence against women and girls
 - evidence of sexual impropriety, sexism, misogyny, domestic abuse, stalking, harassment and/or controlling or coercive behaviour
 - patterns of adverse behaviours
- 6.4 All convictions that result in a custodial prison sentence and/or where individuals are included within the sex offenders register or have mandatory sex offender notification requirements must result in vetting being declined.

7.0 Oversight and accountability for vetting

- 7.1 The Force Vetting Manager is responsible for ensuring that robust quality assurance processes are in place and remains accountable for all decisions made in respect of police vetting. The purpose of this quality assurance is to ensure that all decision-making remains appropriate and proportionate for the individual circumstances of each application and to provide effective oversight that the vetting arrangements are compliant with the Vetting Code of Practice and vetting APP.
- 7.2 Quality assurance checks are currently undertaken on a bi-weekly basis across all levels of the JFVU. This activity is carried out by dip checking a sample of vetting cases to look for any errors in recording and ensure that all decisions taken are suitable and appropriate. These decisions are made by the following individuals within the team:
- Vetting caseworker decisions are checked by the vetting supervisors
 - Vetting supervisor decisions are checked by the Force Vetting Manager
 - Force Vetting Manager decisions are checked by the Chief Inspector within the Professional Standards Department.
- 7.3 Feedback is provided about the individual cases that have been reviewed to identify any organisational learning and to support any training requirements that may be required. These checks are conducted on a bi-weekly basis to ensure that retrospective action can be taken before any individual commences in post or starts a new role, should an incorrect decision about the vetting clearance be made.

8.0 Data Wash Exercise

- 8.1 In January 2023, the Government announced that all police officers, staff and volunteers in England and Wales would be checked against the Police National Database to identify any intelligence and/or allegations that required further investigation.
- 8.2 The outcome of the data wash exercise was positive for Sussex Police, with further action required for only two of the 6,116 police officers, staff and volunteers within the Force who were checked against the database. Both were recognised to be vetting-related issues, with a notifiable association retrospectively added to the personal record for one member of police staff and no further action is required for the police volunteer who has concluded their role with Sussex Police. It was also acknowledged that no criminal investigation was required for either of these two individuals in Sussex.
- 8.3 Further to the data wash exercise, Sussex Police now run daily searches for all existing police officers, staff and volunteers on a 24-hour basis against any new information, incidents and reports that may have been recorded by the Force using Microsoft Power BI – an interactive data visualisation software tool. This process has been further expanded to ensure that any information generated through these searches is subject to consistent assessment and proportionate action taken by the most appropriate unit.

- 8.4 There has been no direction from the College of Policing that another data wash exercise will be required for police forces in England and Wales. The implementation of an annual integrity review for all police officers, staff and volunteers captures the same information and is now completed by line managers each year.
- 8.5 The purpose of the reviews is to capture any changes in personal circumstances that require disclosure to vetting and, if changes are identified, a further vetting review will be carried out if required. This addresses the same purpose as the data wash exercise undertaken previously, with the JFVU recognised to have received increased numbers of vetting reviews immediately after annual integrity reviews are submitted which provides further assurances that the revised process is effective.

9.0 Role of the Sussex Police & Crime Commissioner

- 9.1 It is a statutory responsibility for the PCC to hold the Chief Constable to account for delivering efficient and effective policing in Sussex that is responsive to the needs of the public. This has included holding the Force to account for improving the efficiency and effectiveness of the vetting standards and processes used within Sussex Police.
- 9.2 The PCC has continued to use her monthly webcast Performance & Accountability Meetings (PAMs) to scrutinise and challenge the Chief Constable about the effectiveness of the vetting arrangements used within Sussex Police on behalf of members of the public.
- 9.3 The authorised professional practice for vetting was raised as a theme at the most recent PAM held on 23 April 2025. This area of performance has also been raised at the PAMs held on 17 February 2023 [Police Officer and Staff Data Wash Exercise and Vetting Arrangements] and 18 November 2022 [His Majesty's Inspectorate of Constabulary and Fire & Rescue Service (HMICFRS) – An inspection of vetting, misconduct and misogyny in the police service]. Each of these sessions is archived and can be viewed through the following link: <https://www.sussex-pcc.gov.uk/about/how-we-work/watch-live/>
- 9.4 The PCC has sought to make additional funding available to the Chief Constable through precept investment to increase the capacity and capability of the Professional Standards Department within Sussex Police, including strengthening the JFVU and Anti-Corruption Unit. This investment has enhanced the resources available to process, review and consider any information and intelligence received to support vetting applications, alongside the delivery of a robust response where any further investigations are required.
- 9.5 Following a recommendation made within the HMICFRS inspection report into vetting, misconduct and misogyny in the police service, the Office of the Sussex Police & Crime Commissioner (OSPCC) established an auditable quality assurance process around the vetting decisions made by Sussex Police which resulted in the vetting either having been rejected and/or conditionally approved. The OSPCC also considers whether any disproportionality exists in this process based on any of the nine protected characteristics defined under the Equality Act 2010.

- 9.6 This process was established by the OSPCC in May 2024 and is undertaken on a quarterly basis by the Assurance & Complaints Manager [within the OSPCC] and comprises a dip-check of approximately 10% of all vetting rejections recorded in the previous three-month period.
- 9.7 The office has undertaken 20 dip-checks of rejected vetting decisions to date. This comprised six applications reviewed in May 2024, eight applications reviewed in August 2024 and a further six applications reviewed in February 2025, with the outcomes of these reviews discussed at an oversight meeting between the Assurance & Complaints Manager and the Head of JFVU. None of the vetting decisions considered so far have been found to be incorrect nor has any feedback or organisational learning been identified, although this process is recognised to be another effective tool in terms of holding Sussex Police to account for performance in this important area.

10.0 HMICFRS – Effectiveness of integrity arrangements in Sussex Police

- 10.1 On 30 May 2025, HMICFRS published the findings from their inspection report into how well Sussex Police manage the vetting of its police officers and staff, uphold the standards of professional behaviour addressing potential breaches, and tackle potential corruption and protecting the information it holds, as part of its police integrity inspection programme.
- 10.2 The report found that Sussex Police 'requires improvement' in each of the three different areas assessed within the inspection, including detailed findings about the things the Force is doing well at and the specific areas where it should improve. The HMICFRS report can be viewed through the following link:
<https://hmicfrs.justiceinspectrates.gov.uk/publications/effectiveness-of-integrity-arrangements-in-sussex-police/>
- 10.3 The PCC will discuss the content of the inspection report with the Chief Constable at her PAM on 17 July 2025. This session will be webcast live at 13:00 through the following link:
<https://www.sussex-pcc.gov.uk/about/how-we-work/watch-live/>

11.0 Further reforms to the police dismissal system

- 11.1 Following a High Court ruling in February 2025 that police forces could not dismiss officers by removing their vetting clearance after failing a check, the Government have introduced new legislation that will now make it a legal requirement for all serving police officers to hold and maintain vetting clearance, together with establishing a procedure for withdrawing this clearance where there is evidence that an officer may no longer be suitable to hold it.
- 11.2 The reformed police dismissal system came into force on 14 May 2025 and means that any police officer who does not have the requisite level of vetting clearance required to undertake their role or an ability to maintain that level of vetting will no longer be able to serve as an officer. These new measures are also attached to the Police [Performance] Regulations 2020 which concern unsatisfactory performance, unacceptable attendance and gross incompetence.

11.3 The Professional Standards Department have reviewed, assessed and interpreted the content of the new legislation to ensure that this is fully understood and has created fair, transparent and supporting processes and procedures that will enable these measures to be delivered locally. The PCC will monitor and scrutinise the introduction of these changes as part of her existing performance and accountability processes.

Mark Streater
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Office of the Sussex Police & Crime Commissioner