

HMICS Conduct & Discipline Review (March 2026): Evidential Relevance to Operation Talla and the Scottish Police Authority

The March 2026 HMICS Assurance Review of Conduct and Discipline constitutes a significant evidential development in the wider context of Operation Talla scrutiny.

While the report is framed publicly as a review of conduct, discipline and organisational culture within Police Scotland and the Scottish Police Authority (SPA), the underlying findings extend far beyond employment-process inefficiencies. Read carefully, the report raises profound concerns regarding:

- evidential recording integrity;
- escalation and referral pathways;
- auditability of allegations concerning senior officers;
- whistleblowing safeguards;
- transparency of internal decision-making;
- and governance oversight.

These are precisely the categories of concern repeatedly raised in relation to Operation Talla.

Importantly, the report is not an activist publication, campaign document or speculative commentary. It is an official statutory scrutiny document produced by HM Inspectorate of Constabulary in Scotland under powers conferred by the Police and Fire Reform (Scotland) Act 2012. That distinction materially changes the evidential landscape.

1. Institutional Confirmation of Recording and Auditability Concerns

Perhaps the most significant aspect of the report is the repeated concern expressed regarding deficient recording systems and incomplete audit trails.

HMICS states:

“Record keeping in several key areas - including whistleblowing, senior officer assessments, and conduct investigations - lacks transparency and consistency, undermining assurance and organisational and stakeholder confidence.”

This finding is highly relevant when considered alongside:

- the Speirs Directive of 25 January 2022;
- the documented “*guidance to not record*” material;

- and Operation Talla-related concerns regarding the treatment of Covid and vaccine-related allegations.

The central constitutional issue raised by critics of Operation Talla has never merely been whether allegations were “rejected”. Rather, it has concerned whether systems were structured in a manner capable of preventing allegations from entering ordinary evidential and investigative pathways in the first place.

The HMICS report now formally identifies systemic weaknesses in:

- record creation;
- retention;
- escalation;
- and governance auditability.

That overlap is evidentially significant.

2. “Blank” iBase Records

The most striking section of the report concerns the creation of “blank” iBase records.

HMICS states:

“We heard evidence that NGAU staff had been instructed to create ‘blank’ records on iBase for certain reports of alleged

wrongdoing received including those involving senior officers.”

The report continues:

“When reports against senior officers are received, staff bring these to the attention of NGAU management and, on some occasions, are directed to create a blank file containing no record of the allegation - solely to generate a unique iBase reference number.”

HMICS then concludes:

“We consider that this process undermines transparency, auditability and overall confidence in Police Scotland’s approach to allegations of wrongdoing concerning senior officers.”

This is an extraordinary institutional finding.

The relevance to Operation Talla is obvious.

A recurring concern within the Talla investigation has been whether mechanisms existed within policing systems capable of:

- suppressing auditability;
- redirecting allegations away from formal investigative pathways;

- or creating evidential discontinuity between receipt of allegations and their visible institutional handling.

HMICS has now formally identified the existence of practices which:

- separated allegations from ordinary recording structures;
- generated incomplete records;
- and diminished transparency.

Whether or not such practices were connected directly to Operation Talla matters is ultimately a question requiring further investigation. However, the existence of such mechanisms within Police Scotland materially strengthens the legitimacy of wider concerns regarding institutional recording integrity.

3. Failure to Share Allegations with the SPA

The report further states:

“Police Scotland has failed to report all allegations of senior officer wrongdoing to the SPA.”

HMICS additionally records:

“Interviews with senior officers within Police Scotland further indicated that not all reports of potential wrongdoing

relating to senior officers were being shared with the SPA, as required.”

This finding is constitutionally important.

The entire statutory architecture surrounding senior officer accountability depends upon the SPA functioning as an independent oversight body capable of receiving, assessing and scrutinising allegations concerning senior officers.

If allegations were not consistently transmitted to the SPA, the integrity of the oversight structure itself becomes questionable.

That issue becomes even more significant when viewed against:

- the national Gold/Silver/Bronze command structure of Operation Talla;
- the centralised coordination acknowledged publicly by former NPCC Chair Martin Hewitt;
- and the existence of directives affecting evidential pathways during the Covid period.

4. HMICS Findings Concerning the SPA Itself

The report does not merely criticise Police Scotland.

It raises direct concerns about the SPA.

HMICS states:

“We were not satisfied that the SPA’s arrangements for the initial assessment of senior officer wrongdoing provide adequate assurance.”

It further records:

“reports of senior officers’ alleged wrongdoing received by the SPA were bypassing the complaints team and the newly appointed conduct facilitators, contrary to the SPA’s documented procedures.”

The report additionally states:

“In some instances, reports received directly by senior SPA officials lacked any accompanying record of deliberation or action.”

These findings are highly material in the context of ongoing concerns regarding:

- SPA awareness of the Speirs Directive;
- SPA oversight of Operation Talla-era policing activity;
- and whether the SPA exercised meaningful independent scrutiny during the Covid policing period.

The issue is no longer merely whether the SPA was informed of certain matters.

The report raises concerns regarding whether the SPA's own systems were themselves sufficiently robust, transparent and auditable.

5. Whistleblowing and Protected Disclosure Concerns

The report also identifies substantial deficiencies in whistleblowing arrangements.

HMICS states:

“There is a general lack of awareness of whistleblowing within Police Scotland.”

“Police Scotland’s record keeping on whistleblowing assessments requires improvement.”

More significantly:

“Records did not consistently document the rationale for such decisions or identify the decision maker. This lack of transparency undermines confidence in the integrity of the process.”

This is directly relevant to any environment in which officers or staff may have wished to raise concerns regarding:

- operational directives;
- recording practices;
- evidential handling;

- or national command structures.

The absence of transparent protected disclosure pathways is particularly significant in highly centralised operational environments such as Operation Talla.

6. Institutional Pattern Rather Than Isolated Failure

One of the most important features of the report is that the identified deficiencies are not presented as isolated incidents.

Rather, the report repeatedly describes:

- systemic inconsistency;
- governance weakness;
- inadequate auditability;
- incomplete record keeping;
- bypassing of formal pathways;
- and deficient transparency.

The cumulative picture is therefore not one of accidental administrative imperfection alone.

It is one of institutional systems operating without sufficient evidential robustness in areas directly affecting accountability.

That is precisely why the report carries substantial relevance to Operation Talla scrutiny.

7. Conclusion

The HMICS March 2026 report does not prove every allegation made concerning Operation Talla.

However, it materially alters the evidential environment surrounding those allegations.

It does so because a statutory policing inspectorate has now formally identified:

- deficiencies in recording systems;
- failures in referral pathways;
- incomplete audit trails;
- bypassing of oversight mechanisms;
- weaknesses in whistleblowing safeguards;
- and transparency failures concerning allegations against senior officers.

Those findings overlap directly with core concerns repeatedly raised regarding:

- Operation Talla;
- the handling of Covid-era allegations;

- and the integrity of policing governance structures during the pandemic period.

The report therefore becomes highly relevant evidential material in any broader examination of:

- institutional accountability;
- public access to justice;
- evidential recording integrity;
- and the constitutional implications of nationally coordinated policing structures operating during periods of emergency governance.

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