



Forensic Science Regulator

Regulator's Notification: No. 01-2026

Issue:

Changes to Compliance requirements for FSA- INC 100 Incident Scene Examination.

Section 3.1.2 of The Forensic Science Regulator's Code of Practice version 2 states that the Regulator may suspend the compliance requirements set, including any requirement for accreditation and may reinstate any suspended requirements; the Regulator will notify forensic units that undertake the Forensic Science Activity (FSA) and the Criminal Justice System (CJS) through a report issued under s9 of the Act.

This notification informs forensic units and the CJS of a change to the compliance requirements set for FSA -INC 100 Incident Scene Examination in version 2 of the Code. The requirement for ISO/IEC 17020 accreditation by 6th April 2027 has been suspended.

Background:

Version 2 of the Code introduced FSA specific requirements for Incident Scene Examination (FSA- INC 100) which are set out in section 90. These revisions introduce a pragmatic, risk-based approach to incident scene examination practices. During review of the original 6th April 2027 deadline for the achievement of accreditation to ISO/IEC 17020, it became clear that many organisations would require additional flexibility to adapt their operational processes, competency frameworks and quality systems to meet the updated Code requirements. To ensure proportionality and maintain regulatory assurance while supporting organisational capability development, the Forensic Science Regulator has developed a milestone-based pathway to achieving compliance with the Code.

Description of Notification Changes:

The Forensic Science Regulator has approved a milestone-based pathway toward full compliance with version 2 of the Code for FSA-INC 100 Incident Scene Examination. This suspends the requirement ISO/IEC 17020 accreditation by 6th April 2027 and replaces it with a structured series of mandatory stages. These milestones prioritise areas the Regulator considers poses the highest risk to the CJS and supports organisations in achieving compliance in manageable segments.

The deadline of 6th April 2027 has been repurposed as a deadline for meeting the requirements in Milestone 1. This requires organisations to establish and implement a corporate competency framework that is applicable to a minimum scope of activities as defined by the Regulator and undertaken across all organisational sites and for all crime types. The minimum scope encompasses the following sub activities:

- forensic scene management.
- the recovery of material intended for DNA analysis.
- the recovery of friction ridge detail; and
- the recovery of footwear marks.

This obligation applies consistently across all locations and operational contexts in which the activities are performed.

Milestone 2 requires organisations to have adopted a risk-based approach to anti-contamination and proportionate note taking. This milestone is required to be achieved by 2nd October 2027.

The sub-activities of forensic scene management, recovery of friction ridge detail, recovery of footwear marks, and the recovery of material intended for DNA analysis are considered as core activities that fall within the minimum scope of competency applicable to all organisations undertaking Incident Scene Examination. These sub-activities are therefore not to be treated as 'infrequently used' for the purposes of the Code but instead constitute essential operational

functions for which organisations must demonstrate competency across all operational environments, as required under milestone 1.

For the avoidance of doubt, while these sub-activities fall unequivocally within the defined scope of FSA-INC 100, some methods employed in carrying out these sub-activities comprising specific techniques, tools, procedures may be considered 'infrequently used' where their utilisation meets the criteria set out within the Code section 24.2.9. In such cases, organisations must ensure that appropriate controls, risk-based assurance measures and method-specific competency arrangements are in place, consistent with the expectations of the Code, section 24 governing the application of infrequently used methods.

Although the requirement in the Code for ISO/IEC 17020 accreditation to meet compliance for FSA - INC 100 has been suspended, the requirement for organisations to achieve full compliance with the Code remains unchanged. The Regulator has permitted a milestone-based approach to support organisations in progressing toward compliance; however, meeting the requirements of any milestone does not constitute compliance with the Code. Compliance may only be declared when an organisation has fulfilled all requirements of the Code that apply to the functions and activities it carries out, including those falling within the Code's defined minimum scope. Meeting interim milestones does not constitute compliance but the Regulator considers that it provides appropriate mitigation of the risk presented by the non-compliance. Until all applicable requirements have been satisfied in full, organisations must continue to declare non-compliance.

Process and Date of Implementation

With immediate effect from the date of this Regulatory Notice.



Dr Marc Bailey
June 2026