

SCOTTISH POLICE  
AUTHORITY

<b>Meeting</b>	<b>Audit Committee</b>
<b>Date</b>	<b>11 September 2018</b>
<b>Location</b>	<b>Pacific Quay, Glasgow</b>
<b>Title of Paper</b>	<b>SPA Improvement Tracker Update</b>
<b>Item Number</b>	<b>6.1</b>
<b>Presented By</b>	<b>Lynne Clark, Programme Development Manager</b>
<b>Recommendation to Members</b>	<b>For Information</b>
<b>Appendix Attached</b>	<b>Yes</b>

**PURPOSE**

To provide SPA Audit Committee with an update on the process in place and the progress of improvement activity being undertaken within SPA in response to recommendations from reviews over 2017 and 2018.

## 1. BACKGROUND

A wide range of audits, inspections and improvement reviews of SPA have been undertaken and published throughout 2017 and 2018. Areas of concern requiring actions to be taken have also been noted by the Parliamentary Committees for Justice and for Public Audit and Post-Legislative Scrutiny. Taken together, the recommendations from each of these reviews underpin the improvement activity which is underway within SPA.

A summary of all recommendations and areas of concern contained within these reviews is listed in Appendix A. In total the sets of recommendations comprise over 134 open actions to be progressed. Some of the recommendations relate only to SPA, but others to actions that need to be taken jointly with Police Scotland and/or Forensic Services. Several recommendations are duplicated and appear in more than one review or report.

It was agreed at the April Audit Committee that the Forensic Services improvement recommendations would be included in summary in this report. These are also overseen by the Forensic Services Committee as per the terms of reference.

During the course of the last reporting period SPA has met with Audit Scotland (12<sup>th</sup> June), HMICS (26<sup>th</sup> June) and Internal Audit (28<sup>th</sup> June) to go through recommendations and to discuss evidence of delivery. This has led to some positive outcomes with a number of recommendations being discharged and some being considered for discharge.

A progress update was also provided on 14<sup>th</sup> August to the Forensic Services Committee which has the remit to:

*"Oversee the implementation of improvement recommendations made in relation to the Forensic Service by scrutiny/inspection bodies or the SPA"*

A progress update was also provided on 28<sup>th</sup> August to the Complaints & conduct Committee which has a remit to:

*"Critically examine reports from HMICS, PIRC, and any other information provided by Police Scotland in relation to complaints about the police, and ensure that appropriate improvement plans are implemented or remedial action is taken within agreed timescales."*

## 2. ADDITIONAL REVIEWS - LAST REPORTING PERIOD

Since the last Audit Committee, at which Improvement was reported, there have been 2 further reviews published which have made recommendations for SPA improvement. These are:

**HMICS Independent Assurance Review Police Scotland – Call Handling Update Report (May 2018)** – this is a joint recommendation with Police Scotland to adopt the C3 governance, programme management and quality assurance approaches as standard in implementing significant change programmes.

**National Records of Scotland** – Following a review of the SPA Records Management Plan the Deputy Keeper of the Records agreed that it set out the proper arrangements for the management of the SPA's public records. While the plan was agreed there were a number of improvement recommendations made, including keeping the Plan under regular review.

These new recommendations have been incorporated into the SPA Improvement Tracker.

### **3. KEY IMPROVEMENT THEMES**

As outlined previously to the Audit committee, the SPA is now managing the improvement activity through the SPA Improvement Plan (approved by the SPA Board in May 2018). The improvement priorities have been grouped into four key themes:

- Board and Committees
- Improving internal governance, policies and procedures
- Strengthening external engagement and relationships
- Building SPA executive team capacity and capability

A full update on the Improvement Programme activity is reported to the SPA Board on a quarterly basis through the Chief Officer's Report, the last being in June.

A summary update on the improvement activity over the last reporting period is as follows:

#### **3.1 BOARD AND COMMITTEES**

*Ensuring that the structure, composition and workings of our decision-making arrangements enable a strategic approach which focusses on the right issues at the right time and adds value to the development of policing in Scotland*

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**Board Development** - Development sessions, including Equality & Diversity awareness have been ongoing and are currently planned through to October 2018 and the sessions will continue with the SPA Vice Chair taking the lead on shaping and developing the overall programme from that point onwards.

**Review of committee structures** – Draft terms of reference for new and revised committees will be developed over the coming weeks through the Transformation Working Group. In addition, revised Audit Committee terms of reference will be presented to the Board to align with the new Audit and Assurance Committee Handbook. This is now expected to be presented to the SPA Board in October.

The following recommendations are linked to the Board and Committees theme in the SPA Improvement Plan.

Report	Recommendations
HMICS Thematic Inspection of the SPA – Phase 1 Review of Openness and Transparency	R3, 5, 6, 7, 8, 9, 10
Information Commissioner’s Audit Report of SPA	Security R11, 12
Audit Scotland 2016/17 Annual Audit Report	R12
HMICS Local Policing + Inspection of Firearms licensing	R6
Scottish parliament’s Public Audit and Post Legislative Scrutiny Committee	R5
Review of the SPA Executive (‘Marchant-Burr report’)	R4, 5, 17
HMICS Independent Assurance Review PS – Call Handling Update Report	1

### **3.2 IMPROVING INTERNAL GOVERNANCE, POLICIES AND PROCEDURES**

*Streamlining and improving our governance documents, policies and ways of working to deliver a more professional standard of operation which is consistent with best practice and builds a culture of continuous improvement.*

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**GDPR** – As reported previously to the Board, a very significant amount of work has been undertaken during 2018 to work towards the SPA’s compliance with the General Data Protection Regulations (GDPR). Throughout this period the GDPR Project Senior Responsible Owner reported progress to the Audit Committee. One key activity was to ensure that Internal Audit recommendations published in December 2017 were implemented. The SPA executive team provided evidence in July 2018 to our Internal Auditors of the work completed to achieve this, and Internal Auditors subsequently reported in July to the Audit Committee that in their view the recommendations had been discharged.

**ICO Audit** – A status update on implementation of recommendations from the Information Commissioner’s Office (ICO) Report published October 2017 was reported to SPA Audit Committee in July 2018. The Committee agreed that the newly established SPA Information Governance Forum should oversee the implementation of outstanding recommendations. Internal Audit are currently carrying out an assurance check on progress, and they will report their conclusions to the Audit Committee. A follow up audit by the ICO is scheduled for December 2018.

**Complaints Audit** – Intensive work has been carried out to ensure that recommendations from an audit of the SPA’s complaints handling procedures published in December 2017 by the Police Investigations and Review Commissioner (PIRC) have been implemented. All actions have now been completed, and an update on progress given to PIRC. The PIRC is content that the SPA has discharged all the actions arising from that audit, and they will schedule a follow up audit in due course to confirm compliance. The Complaints & Conduct Committee noted the update on the PIRC Audit at its meeting of 28 August 2018.

The following recommendations are linked to the Improving Internal Governance, Policies and Procedures theme in the SPA Improvement Plan.

Report	Recommendations
Internal Audit Report 2016/17 - Business Continuity Planning	Control Objective 1 – 6 Corporate Control Objective 1 – 6

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	Forensic Services
HMICS Thematic Inspection of the SPA – Phase 1 Review of Openness and Transparency	2
Information Commissioner’s Audit Report of SPA	Security: 7,8,11,12,15,16,17,18,22,23,24,27,28,35,36,37,39,41,42,44,46,49,50,51,54,55,56,57,58,68,69,71,72,73,74,75,80,81,82,85,87,88,89,90,91,93,94,95,97,98,100,101,103,104,107,108 Training: 1,2,3,4,8,9,10,11,12,15,16,18,19,20,21,22,23,24,25,26,27,28,31,32,33,38,42,43 Data Sharing: 1,5,6,7,8,11,12,13,14,16,18,21,22,27,29
Audit Scotland 2016/17 Annual Audit Report	1, 2, 4, 6, 7
PIRC Audit of Complaints	R1 - 12
Audit Scotland 2016/17 Report under section 22	3
Internal Audit Report on GDPR readiness	Control Objective 1 - 6
Scottish parliament’s Public Audit and Post Legislative Scrutiny Committee - Dec	1, 2, 3, 4, 5
Scottish parliament’s Public Audit and Post Legislative Scrutiny Committee - Jan	1, 7, 8, 9, 10
Review of the SPA Executive (‘Marchant-Burr report’)	R1, 11, 14, 15, 16
Internal Audit of Police Scotland Governance	1
National Records of Scotland	R1 - 14

### **3.3 STENGTHENING EXTERNAL ENGAGEMENT AND RELATIONSHIPS**

*Embedding a collaborative, outward looking approach to everything that SPA does, so that we can better reflect public and communities’ views about policing in our actions, and build partnerships which help us work more effectively.*

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**Collaboration** – SPA continues to seek out opportunities for further collaboration and stakeholder engagement through the work of the SPA Chair and Board Members.

In particular SPA is building in stakeholder perspectives within the SPA Annual Review of Policing 2018-19. An encouraging 21 submissions from local authorities to inform the Annual Review have been received, and these are currently being analysed. The Annual Review is due to be laid in Parliament in November this year.

**Developing relationships** – Progress is being made on a joint programme of work to strengthen local policing and local scrutiny. In particular a workshop was held for group members, in July, on the engagement processes supporting service development and change. A performance-focused workshop took place on 13th August, with contributions from SPA/ COSLA/ Police Scotland, and local authority officers who support local scrutiny arrangements and partnerships with policing. This is intended to further inform the group's understanding of local priorities, current good practice, and opportunities for improvement. Outputs will inform the group's recommendations re options for improvement and a joint draft engagement protocol.

The following recommendations are linked to Strengthening External Engagement and Relationships theme in the SPA Improvement Plan.

Report	Recommendations
HMICS Thematic Inspection of the SPA – Phase 1 Review of Openness and Transparency	R1
Information Commissioner's Audit Report of SPA	Training R32
Scottish parliament's Public Audit and Post Legislative Scrutiny Committee - Jan	2
Scottish Parliament's Justice Sub- committee on Policing - Letter on the draft budget for 2018-19	4
Review of the SPA Executive ('Marchant-Burr report')	6, 7, 8, 9, 10, 11

### 3.4 BUILDING SPA EXECUTIVE TEAM CAPACILTY AND CAPABILITY

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*Building essential additional capacity and skills in order to deliver a professional and consistent standard of service in delivering SPA's core functions.*

**SPA executive team capacity and capability** – all SPA staff have been consulted on proposed changes to the SPA executive team's structure, and several very constructive suggestions have been received. Once the final structure has been agreed following consideration of those suggestions the CO will respond individually to all respondents and will provide a further update in early September to the Joint National Consultative Committee (JNCC).

The following recommendations are linked to the Building SPA Executive Team Capacity and Capability theme in the SPA Improvement Plan.

Report	Recommendations
HMICS Thematic Inspection of the SPA – Phase 1 Review of Openness and Transparency	R11
Information Commissioner's Audit Report of SPA	Security R7, 12, 18, 23, 24, 35, 41, 54, 85, 87, 88, 89, 90, 91, 93, 104, 107 Training R1, 3, 10, 11, 18, 23 Data Sharing R27
Audit Scotland 2016/17 Report under section 22	2
Scottish Parliament's Justice Sub- committee on Policing - Letter on the draft budget for 2018-19	3
Review of the SPA Executive ('Marchant-Burr report')	2, 3, 12, 13

### **3.5 FORENSIC SERVICES IMPROVEMENT**

An update on the Forensic Services HMICS recommendations was presented in full to the Forensic Services Committee on 14 August.

Forensic Services also met with the HMICS Lead and Associate Inspectors as part of the regular engagement around the progress of the recommendations. Each recommendation and the evidence of delivery was discussed and it was agreed that a significant amount of progress had been made. All the evidence to date has been issued to HMICS to allow an assessment of status.



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It was reported to the Forensic Services Committee that of the 23 recommendations FS were proposing to close 9 with 1 closed in the previous reporting period. A verbal update from HMICS was given at the HMICS Short Life Working Group (SLWG), 20<sup>th</sup> August, and HMICS indicated they are content to close 6 of the 9 with some further evidence required on the remaining 3.

Report	Recommendations
HMICS Inspection of SPA Forensics Services	R1 - 23

**4. FINANCIAL IMPLICATIONS**

4.1 There are no direct financial implications associated with this paper.

**5. PERSONNEL IMPLICATIONS**

5.1 There are no direct personnel implications associated with this paper.

**6. LEGAL IMPLICATIONS**

6.1 There are no direct legal implications associated with this paper.

**7. REPUTATIONAL IMPLICATIONS**

7.1 There are no direct reputational implications associated with this paper.

7.2 While no direct implications exist within this paper it is important that SPA continues to demonstrate a commitment to continuous improvement across all its functions and support to the SPA Board.

**8. SOCIAL IMPLICATIONS**

8.1 There are no social implications associated with this paper.

**9. COMMUNITY IMPACT**

9.1 There are no community implications associated with this paper.

**10. EQUALITIES IMPLICATIONS**

10.1 There are no equality implications associated with this paper.

## 11. ENVIRONMENT IMPLICATIONS

11.1 There are no environmental implications associated with this paper.

### **RECOMMENDATION:**

Members are requested to:

Note the improvement activity which is underway in SPA and which will address recommendations resulting from a number of audits, inspections and reviews.

Appendix A - Summary Table of Recommendations

			Number and Status of Recommendations Scottish Police Authority					
Source	Report Name	Date	Breakdown of Recommendations	Total	Closed	Pending Discharge	Open	Notes
SPA	The Chairs Review of Governance in Policing	Mar-16	SPA/SG/PS	30	30		0	5 recommendations were superseded by more recent publications
Internal Audit	Internal Audit - Business Continuity Planning (FS)	Mar-17	FS	9	8		1	
Internal Audit	Internal Audit - Business Continuity Planning (SPA)	Mar-17	SPA/FS	8	2		6	the policy has now been approved by SMG and remaining work will be progressed together with Police Scotland
SPA	The Chair's Recommendations - May 2016 Board Meeting	May-17	SPA	4	4		0	
HMICS	HMICS Thematic Inspection - Phase 1 Openness and Transparency	Jun-17	SPA	11	0	11	0	Awaiting formal communication from HMICS on discharge of recommendations
HMICS	HMICS Review of Scottish Police Authority Forensic Services	Jun '17	SPA/FS/PS	23	1	6	16	Awaiting formal communication from HMICS on discharge of recommendations
ICO	Information Commissioner's Audit	Oct-17	SPA/FS/PS	117	45		72	Cross-over between these recommendations and those of the GDPR Project
Audit Scotland	Annual Audit Report 16/17	Nov-17	SPA/PS	8	0	3	5	inc. 1 for Forensic Services
PIRC	SPA Complaints Audit	Dec-17	SPA	12	12		0	Update reported to PIRC
Internal Audit	Internal Audit Report 2017/18 - GDPR Readiness	Dec-17	SPA/FS	6	6		0	Confirmation at July Audit Committee
HMICS	Local Policing + Inspection of Firearms Licensing	Mar '18	PS/SPA	1	0		1	This recommendation is mapped within the SPA Improvement Plan
SPA	Review of the Scottish Police Authority (SPA) Executive	Mar '18	SPA	17	0		17	These recommendations are all mapped within the SPA Improvement Plan and will be delivered in line with the timescales
Internal Audit	Scott Moncrieff Report on Police Scotland Governance	Apr-18	SPA/PS	1	0		1	
HMICS	Independent Assurance Review Police Scotland - Call Handling Update Report	May-18	SPA/PS	1	0		1	Timescales to be defined - NEW
National Records of Scotland	Records Management Plan	Jul-18	SPA	14	0		14	Timescales to be defined - NEW
<b>TOTAL</b>				<b>262</b>	<b>108</b>	<b>20</b>	<b>134</b>	

Number and Status of Areas of concern/Action Scottish Police Authority							
Source	Report Name	Date	Breakdown	Total	Closed	Pending Discharge	Open
PAPLS	Scottish Parliament's Public Audit and Post Legislative Scrutiny Committee session	Dec-17	SPA	5	0	1	5
Audit Scotland	Audit Scotland Report 2016/17 (section 22)	Dec-17	SPA	2	0		2
Justice Sub-Committee (Policing)	Scottish Parliament's Justice Sub-committee on Policing Letter on the draft budget for 2018-19	Jan-18	SPA/SG/PS	7	0		7
PAPLS	Scottish parliament's Public Audit and Post Legislative Scrutiny Committee session	Jan-18	SPA	10	0		10
<b>TOTAL</b>				<b>24</b>	<b>0</b>	<b>1</b>	<b>23</b>

  

Notes
A letter is to be issued to the Convenor of PAPLS from SPA CO
A letter is to be issued to the Convenor of Justice Sub Committee on Policing from SPA CO
A letter is to be issued to the Convenor of PAPLS from SPA CO