

SCOTTISH POLICE  
AUTHORITY

Meeting	SPA Board Meeting Public Session
Date	27 October 2016
Location	Murrayfield Stadium, Edinburgh
Title of Paper	HMICS Review of CCU – Implementation of Recommendations
Item Number	6
Presented By	DCC Johnny Gwynne
Recommendation to Members	For Noting
Appendix Attached:	NO

**PURPOSE**

The purpose of this paper is to update the Scottish Police Authority on the progress made towards the implementation of the recommendations contained within the HMICS Assurance Review of Police Scotland's Counter Corruption Unit.

**1. BACKGROUND**

- 1.1 On Monday 27 June 2016 HM Inspector of Constabulary in Scotland published its Assurance Review into the state, effectiveness and efficiency of the Police Scotland’s Counter Corruption Unit (CCU).
- 1.2 The intention behind the review was to independently determine the facts and to identify practical lessons that will assist in improving police counter corruption practices in Scotland.
- 1.3 As a result of this review 39 recommendations covering various aspects of CCU activity and governance were presented.
- 1.4 Implementation of the review recommendations is being overseen by the Police Scotland Assurance Review Steering Group Chaired by the DCC Crime & Operational Support.

**2. FURTHER DETAIL ON THE REPORT TOPIC**

- 2.1 Work remains ongoing in response to all 39 of the recommendations contained within the review.
- 2.2 It should be noted that Recommendations 2 and 3 do not fall within the remit of the Steering Group and work in relation to these recommendations is being overseen directly by the DCC (Designate).
- 2.3 The following is a synopsis regarding progress of the recommendations overseen by the Assurance Review Steering Group.

**Risk / Exposure**

The 37 Recommendations have been risk assessed as follows -

<b>3- High</b>	High or very high risk exposure – absence / failure of significant controls, procedures and/or policies which puts services at high risk.	<b>29</b>
<b>2- Medium</b>	Medium risk exposure – not all key controls, procedures or policies are working effectively which may expose Police Scotland to a moderate amount of risk.	<b>5</b>
<b>1 - Low</b>	Low risk exposure – minor controls, processes, policies and/or procedures are not in place, they are not working effectively or efficiently. An area for improvement or general housekeeping point.	<b>3</b>

## Progress

The progress status of the recommendations are as follows –

BLUE	Discharged by HMICS or proposed for closure by Police Scotland	5
RED	Not started. Not on track or within agreed timescales	1
AMBER	Progressing. On track but minor slippage	1
GREEN	Progressing. On track	30

- 2.4 5 recommendations have been proposed for closure and 30 recommendations are currently in progress and developing on track.
- 2.5 This represents an approximate completion rate of 13% of the overall recommendations made by HMICS.
- 2.6 The following recommendations have been proposed for closure:

### Recommendation 1

Review of CCU intelligence processes - An enhanced process for evaluation, validation and risk assessment has been implemented which mirrors the process already in place throughout the rest of Police Scotland.

### Recommendation 6

Development of CCU Strategy and Vision for tackling corruption - A vision statement for Police Scotland's CCU has been developed in conjunction with the revised Counter Corruption Unit Policy Document. The Counter Corruption Unit Vision Statement and Policy Document were developed in consultation with key stakeholders via the CCU Assurance Review Reference Group with the final versions of the documents being amended to incorporate their suggestions.

Both the vision statement and the policy document have been designed to support the core values of the organisation.

Following appropriate consultation, the final Counter Corruption Unit Policy and Vision Statement was presented to, and endorsed by the Police Scotland Senior Leadership Board on 29 September 2016.

**Recommendation 14**

Consider adopting Anti-corruption Authorised Professional Practice - All CCU staff have received a personal copy of the Anti-Corruption APP (Prevention, Intelligence and Enforcement) via the online CCU SharePoint Team Site which is accessible to all CCU staff.

The CCU will refer to Anti-Corruption APP when reviewing or developing key CCU policies and procedures, taking cognisance of potential differences within UK Law Enforcement.

**Recommendation 15**

Production and publication of Strategic Assessment and Control Strategy.

The Strategic Assessment, Control Strategy and Intelligence Requirements has been created and approved at the Police Scotland Senior Leadership Board on 29 September 2016.

Although tailored to the unique work of the CCU, the priorities support a number of the very high or high risk elements within the wider Police Scotland Control Strategy 2016/17.

**Recommendation 24**

Review of Police Scotland personnel on restricted duties – A review of all personnel on restricted duties has been completed and to ensure that enhanced strategic oversight is placed upon the application of duty restrictions, weekly briefings are provided to the DCC (Designate) via the Head of PSD in order to ensure the application of duty restrictions are necessary and proportionate with cognisance being taken of welfare and risk to officers.

**2.7 Remaining Recommendations**

There is 1 recommendation progressing and on track however, it has emerging risks which may impact on delivery. This relates to Recommendation 27 and Workforce monitoring Software. Development work in respect of a business case to support this action is ongoing however initial estimated costs for potential delivery are significant at this stage.

There is 1 recommendation marked as not started or not on track or within agreed timescales and relates to Recommendation 22 – ‘Police Scotland should engage with the Police Investigations and Review Commissioner to consider establishing a confidential reporting system’.

Recommendation 22 remains at Red at this time until further development and consultation is undertaken in respect of the Police Scotland 'Whistleblowing' Guidance. Once this has progressed engagement with Police Investigations and Review Commissioner (PIRC) will be undertaken.

### **3. FINANCIAL IMPLICATIONS**

3.1 There are no financial implications in this report.

### **4. PERSONNEL IMPLICATIONS**

4.1 There are no personnel implications associated with this paper.

### **5. LEGAL IMPLICATIONS**

5.1 There are no legal implications in this paper.

### **6. REPUTATIONAL IMPLICATIONS**

6.1 There are no reputational implications associated with this paper.

### **7. SOCIAL IMPLICATIONS**

7.1 There are no social implications associated with this paper.

### **8. COMMUNITY IMPACT**

8.1 There are no community implications associated with this paper.

### **9. EQUALITIES IMPLICATIONS**

9.1 There are no equality implications associated with this paper.

### **10. ENVIRONMENT IMPLICATIONS**

10.1 There are no environmental implications associated with this paper.

## **RECOMMENDATIONS**

Members are requested to: Note the content of this paper