

<b>Meeting</b>	<b>SPA Audit, Risk and Assurance Committee</b>
<b>Date</b>	<b>20 January 2022</b>
<b>Location</b>	<b>By video-conference</b>
<b>Title of Paper</b>	<b>SPA Audit and Improvement Recommendations Update</b>
<b>Presented By</b>	<b>John McNellis, Head of Finance, Audit &amp; Risk</b>
<b>Recommendation to Members</b>	<b>For discussion</b>
<b>Appendix Attached</b>	<b>Appendix A - SPA Business Plan – Interim progress  Appendix B - SPA audit and inspection recommendations</b>

**PURPOSE**

To provide the Audit, Risk and Assurance Committee (ARAC) with an update on the progress against the SPA corporate business plan (2021/22) and open recommendations from all SPA corporate audit and inspection activity.

*The paper is presented in line with the corporate governance framework of the Scottish Police Authority (SPA) and Audit, Risk and Assurance Committee (ARAC) terms of reference and is submitted for consultation.*

**1. BACKGROUND**

- 1.1 The SPA annual business plan (2021/22) was approved by the Board in May 2021. The plan outlines six strategic outcomes with 25 underlying priorities.
- 1.2 Progress against completion of the business plan objectives is reported to ARAC on a quarterly basis. Where reporting does not align an interim update will be provided, to give an exceptions based insight on any delayed milestones.
- 1.3 Progress against audit and inspection recommendations are routinely reported to ARAC, these are tracked through a single audit and improvement recommendations tracking document.
- 1.4 In addition, other committees may also consider specific updates on progress where relevant to their terms of reference.

Reporting to other committees

<b>Committee</b>	<b>Detail</b>	<b>Date / frequency</b>
Forensic services committee	Update on implementation of the improvements set out in HMICS Thematic Inspection of the SPA Forensic Service	Quarterly Ongoing
Complaints & conduct committee	<u>Review of Complaints Handling, Investigations and Misconduct Issues in Relation to Policing</u>  In November 2021, the CCC was provided with an update on actions being progressed by SPA officers in respect of recommendations arising from the Final Report and those outstanding from the Preliminary Report.  Of the 31 recommendations identified in the action plan, 20 were noted as complete	Ongoing

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

### **Part i) SPA business plan progress (Appendix A)**

- 2.1 The business plan has six strategic outcomes with 25 underlying priorities for 2021/22. Internally the SPA initially set a further 126 underpinning milestones. These milestones allow the SPA to track and evidence progress towards achieving each priority which is reported quarterly to ARAC.
- 2.2 Of the 126 milestones, 87% are on track. After revising deliver time 99% of milestone are still anticipated to be delivered in year.
- 2.3 At the end of quarter three, of the 126 milestones:
- o 60% (76) have been achieved;
  - o 27% (33) are on track; and
  - o 12% (17) have been delayed but will be completed in year.
  - o 1% (2) have been delayed and are not expected to be completed in year
- 2.4 Progress against achieving milestones is closely monitored and tracked by the SPA strategic business management team.

### **Part ii) Development of the Business Plan for 2022/23**

- 2.5 Work is progressing at pace on the development of the SPA Corporate Business Plan for 2022/23 which is on track for approval by the Board in March.
- 2.6 The following activities already complete or in train: -
- o Engagement with SPA leaders and staff team has taken place to inform a draft Business Plan for 2022/23.
  - o Draft plan was presented to the Board sponsor in December 21.
  - o Workshops are scheduled during January for teams to confirm activity during 2022/23. Milestones underpinning this activity will be identified to develop a performance framework to support reporting to ARAC and SMT.
  - o As shown in the updates on the 2021/22 priorities, consideration is being given to where there may be carry over activity.
  - o External stakeholders will be asked for their views on a draft plan in February 2022.

### Part iii) SPA audit and inspection recommendations (Appendix B)

- 2.7 The SPA continues to make progress, reducing the number of outstanding recommendations by 6 over the previous quarter.
- 2.8 In particular, the SPA is pleased that all recommendations from the HMICS Thematic Inspection of SPA, both fully or partially owned by SPA, have now been **fully discharged as complete by HMICS**.
- 2.9 Progress also continues to be made on closing outstanding ICO recommendations which reduced by 3 over the previous quarter. Whilst not able to close more recommendations, a majority of outstanding actions are now close to completion. The SPA information management strategy will shape the future direction of this function.

### 3. FINANCIAL IMPLICATIONS

- 3.1 There are specific financial implications associated with this paper.

### 4. PERSONNEL IMPLICATIONS

- 4.1 There are no personnel implications associated with this paper.

### 5. LEGAL IMPLICATIONS

- 5.1 There are no legal implications associated with this paper.

### 6. REPUTATIONAL IMPLICATIONS

- 6.1 There are no reputational implications associated with this paper, however there are potential reputational implications associated with the pace and effectiveness with which the recommendations are addressed.

### 7. SOCIAL IMPLICATIONS

- 7.1 There are no social implications associated with this paper.

### 8. COMMUNITY IMPACT

**OFFICIAL**

8.1 There are no community impact 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 update on progress of the SPA audit/improvement recommendations and progress of the business plan.

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# Appendix A

## SPA Business plan interim progress

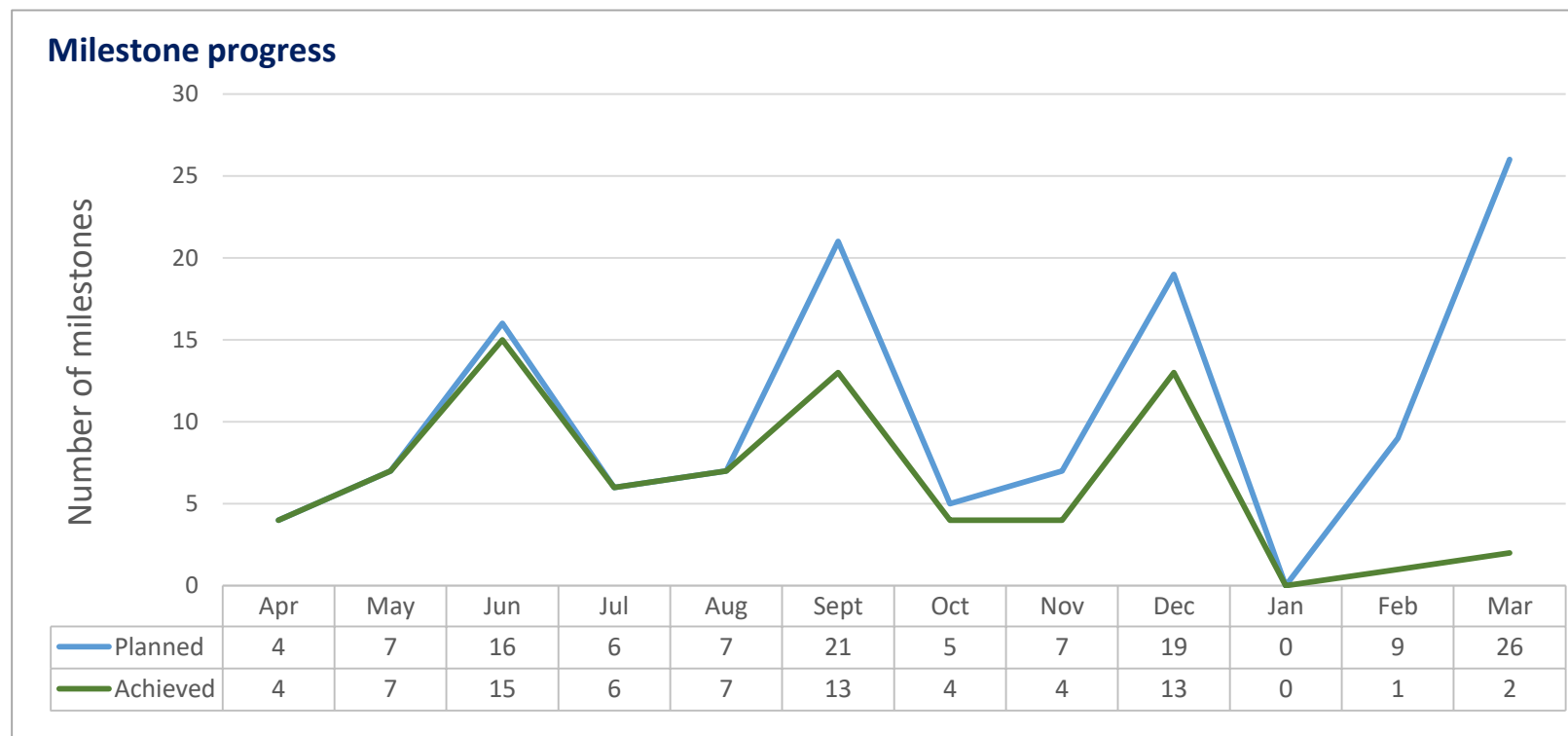
### January 2022

# SPA business plan – progress summary

SPA Strategic Outcomes	No. of Priorities	No. of Milestones	Current status at December 2021			
			Complete	On track	Delayed	
					Achieved in year	Achieved next year
1. Communities and partners	4	20	13	6	1	-
2. Public interest and confidence	8	53	39	10	4	-
3. Partner collaboration	3	11	5	9	-	-
4. Resourcing requirements	5	17	9	7	2	-
5. Workforce	3	11	3	3	3	2
6. Decision making, scrutiny and reporting	2	13	7	1	5	-
<b>Total</b>	<b>25</b>	<b>126</b>	<b>76</b>	<b>33</b>	<b>15</b>	<b>2</b>
<b>%</b>			<b>60%</b>	<b>27%</b>	<b>12%</b>	<b>1%</b>

**87% on track / 13% delayed**  
**99% to be achieved in year**

- SPA set an ambitious business plan for 2021/22. Business plan priorities are organised under the most appropriate corporate plan outcome and a number of milestones underpin each priority in order to evidence progress throughout the year.
- Each milestone has an agreed measure of success using the SMART approach (specific, measurable, achievable, realistic and time bound).
- This update reflects **progress** against the **quarter three** reporting period. The underlying detail is monitored by SPA officials and the SPA SMT
- The SPA has achieved or is on track for the majority of milestones (87%). Further detail on priorities with missed milestones and revised target dates are shown on the following pages.
- Of those delayed milestones the majority are still expected to be **delivered within the current financial year**.
- Set against a challenging list of milestones and with ongoing COVID issues this represents excellent progress .



# Delayed milestones (1 of 3)

There are 17 delayed milestones - 7 reported to ARAC in September and a further 10 reported as delayed at December 2021. Crucially this page shows two priorities that after the delay will not be fully achieved within the business plan year.

BP priority	Summary of business plan milestone	Original Date	Revised Date	Update
2.6	Working with Police Scotland develop and implement a robust <b>approach to the assessment of human rights, ethics, data privacy, and equalities impact</b>	Dec 21	Mar 22	<p><u>Expect partial delivery in-year.</u></p> <p>The planned work to address this priority stretched the overall target date from Dec 21 to Mar 22.</p> <p>Milestones to develop an Impact Assessment Framework, to incorporate related processes in to the Authorities oversight of change and to test processes are on track. However, the scope of this work and interdependencies may impact on actual implementation of the combined Framework and therefore may carry over to 2022/23.</p>
5.1	Influence development of the new <b>People Strategy</b> and ensure it is informed by an effective needs assessment, is aligned to the Strategic Workforce Plan, and that there are clear outcomes measures identified	Sep 21	Nov 21	<p><u>Expect partial delivery in-year.</u></p> <p>Delay in the new People Strategy being presented to the People Committee has impacted two milestones.</p> <p>The Annual Delivery Plan is now scheduled to be presented to the People Committee in May and therefore work to influence and oversee this will carry over to 2022/23.</p>



# Delayed milestones (2 of 3)

There are 17 delayed milestones - 7 reported to ARAC in September and a further 10 reported as delayed at December 2021. However, this shows delayed milestones that **will still be achieved within the business plan year**.

BP priority	Summary of business plan milestone	Original Date	Revised Date	Update
1.1	Work with Police Scotland to continuously <b>improve the completeness and accessibility of public performance reporting on policing performance</b>	Mar 22	Mar 22	The final PS product will be reported to Policing Performance Committee in March 2022. This is later than anticipated by the Authority and therefore delayed one milestone around drafting benchmarking indicators. <i>One milestone missed.</i>
1.3	Undertake SPA commissioned <b>public confidence polling</b> .	Sep 21	Mar 22	A new programme of longer term polling impacted this priority and stretched the overall target date from September 2021 to March 2022. <i>Revised target date.</i>
1.4	<b>Further strengthen links between the SPA and COSLA, SOLACE</b> and Local Authority Scrutiny Panels in order to enable local matters to be fully reflected in SPA priorities and public reporting.	Sep 21	Mar 22	It was recognised that engagement on this priority would be ongoing throughout the year stretching the overall target date from September 2021 to March 2022. <i>Revised target date.</i>
2.2	Procure external supplier to support review and improve accessibility and navigation of <b>SPA website</b> .	Jul 21	Mar 22	This priority was delayed due to two unsuccessful procurement exercises stretching the overall target date from September 2021 to March 2022. A supplier has now been appointed and work to review the existing website and engage with external stakeholders is scheduled to complete by end January 2022. <i>Two milestones missed.</i>
2.3	Working with Police Scotland, develop a <b>memorandum of understanding</b> that requires early engagement on new strategies, practice etc.	Jul 21	Mar 22	Planned work to review the implementation of the memorandum of understanding stretched the overall target date from July 2021 to March 22. Delayed review work will be completed by March 22 to align with the new oversight of change approach agreed. <i>One milestones missed.</i>
2.7	Further develop and implement an <b>approach to engaging with citizens and groups</b> to promote an understanding of public views on topics of public interest in policing and to measure	Dec 21	Feb 22	A roundtable on the use of technology for policing has been deferred from December 2021 to February 2022 by the Joint Research and Evidence Forum to reflect reduced capacity to plan during COP26. <i>One milestone missed.</i>

# Delayed milestones (3 of 3 )

There are 17 delayed milestones - 7 reported to ARAC in September and a further 10 reported as delayed at December 2021. However, this shows delayed milestones that **will still be achieved within the business plan year**.

BP priority	Summary of business plan milestone	Original Date	Revised Date	Update
3.3	Work with key stakeholders and partners to provide enhanced oversight and scrutiny of the Policing of <b>COP-26</b>	Dec 21	Mar 22	Work planned to assess lessons learned from the policing and oversight activity stretched the overall target date from December 2021 to March 22. <i>Revised target date.</i>
4.1	Develop and implement SPA's approach to securing and demonstrating <b>Best Value</b> .	Mar 22	Mar 22	PS provided a verbal update on a planned approach to demonstrating Best Value responsibilities at an ARAC Development Day in November 21. An approach is on track to be agreed by March 22 (to be presented at ARAC in May 22). <i>One milestone missed.</i>
4.4	Mature the approach to the Authority's <b>strategic oversight of transformational change</b> .	Mar 22	Mar 22	Mapping the transformation portfolio is still to complete due to a delay in the availability of information from PS. <i>One milestone missed.</i>
5.2	Ensure effective completion of 2020/21 <b>pay negotiations</b> .	-	Mar 22	Delayed work on a formal framework for staff pay is progressing and due to be established by January 2022. Delayed work to develop an officer reward plan is progressing but may be impacted by the delayed People Strategy. <i>Two milestones missed</i>
5.3	Develop and implement an SPA Corporate <b>People and Organisational Development Plan</b>	Mar 22	Mar 22	Delayed work on agreeing the final SPA Corporate People and OD Plan is anticipated to be complete by January 2022 with implementation to follow. <i>One milestone missed</i>
6.1	<b>Share Point</b> user specifications	Sep 21	Mar 22	The extent of the work to review the existing file structure stretched the overall target date from September 2021 to March 22. Implementation of the SharePoint platform has been impacted by the file structure review work but is expected by end January 2022. <i>Four milestones missed</i>
6.2	Develop and implement an approach to <b>horizon and environmental scanning</b>	Sep 21	Mar 22	The extent of engagement required stretched the overall target date from September 2021 to March 2022. Work on a communication package is delayed but anticipated to complete by March 2022. <i>One milestone missed</i>

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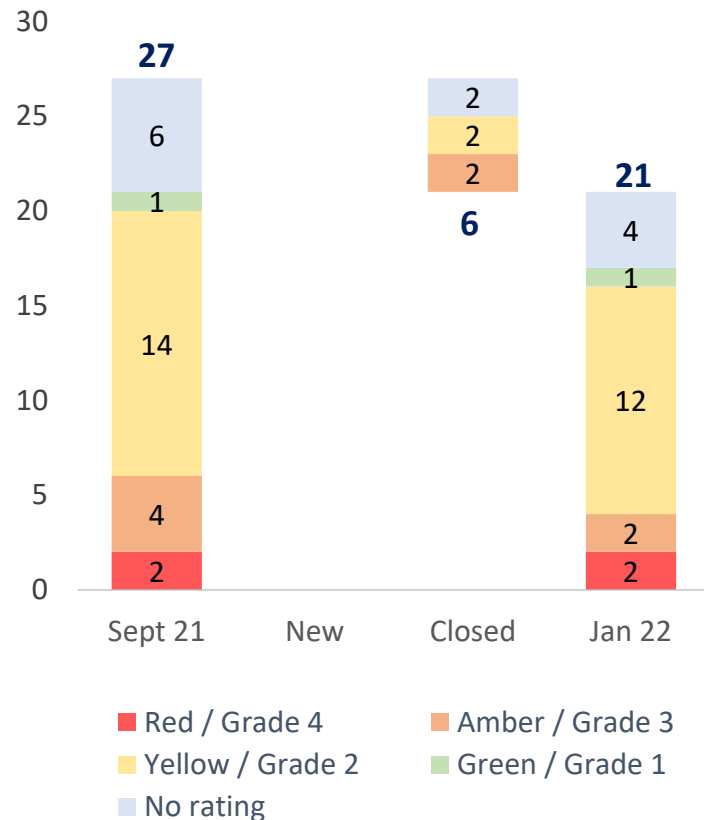
# **Appendix B**

SPA audit and inspection  
recommendations update

**January 2022**

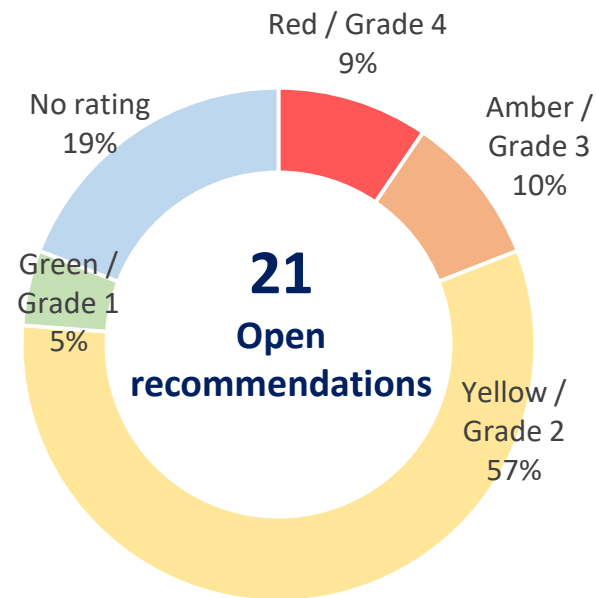
# SPA audit and inspection dashboard

## Progress update (number of SPA recommendations)



- A total of six recommendations have been closed.
  - two HMICS,
  - one internal Audit and
  - three ICO.
- The next page provides further detail of the SPA's tracking of actions against their agreed completion date.

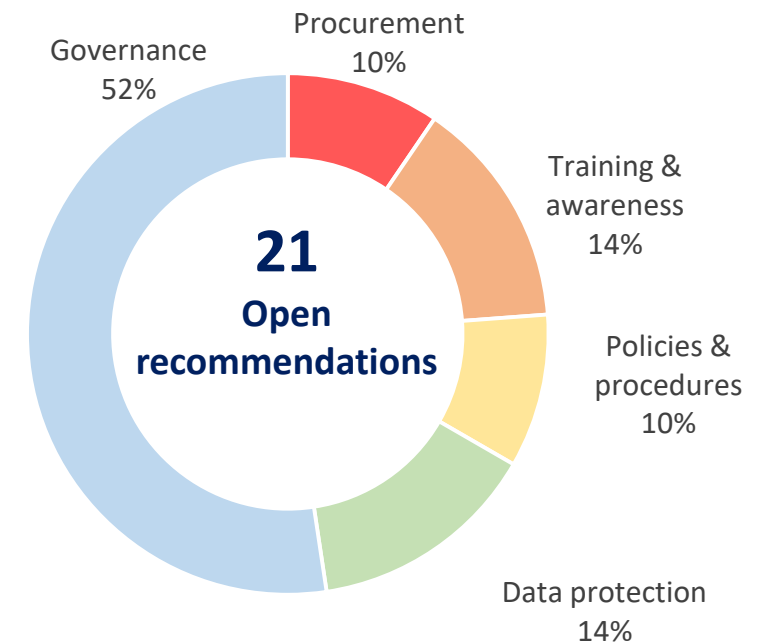
## RAG analysis



*Note: the recommendations without a rating are predominantly HMICS. HMICS do not rate their recommendations and the SPA is considering self-assessing the priority of future HMICS recommendations.*

- The largest proportion of actions fall into the yellow (grade 2) category, which indicates moderate risk exposure.
- There are two outstanding red (grade four) recommendations, indicative of very high risk exposure. These relate to the ICO audit of the SPA and will be discharged by the completion of a s83 data sharing agreement between the SPA and Police Scotland.
- This exercise has now been subsumed within the governance review project and further work is required dependant any changes agreed from this review.

## Identified theme



- All audit and inspection recommendations are recorded on a central SPA tracking document. This allows SPA to review and identify themes across reports and inspection bodies which may help our analysis and continuous improvement.
- Governance accounts for the largest proportion of improvement actions (52%). Recommendations have primarily arisen from HMICS reports and ICO. This highlights a continued need for SPA to ensure public scrutiny and accountability which is a theme of the SPA business plan.

# Further detail on progress

## Movement since previous ARAC report

	Sept 2021	New	Complete	Jan 2022
Internal Audit	4	-	1	3
Audit Scotland	-	-	-	0
HMICS	6	-	2	4
ICO	16	-	3	13
National Records of Scotland	1	-	-	1
<b>Total</b>	<b>27</b>	<b>-</b>	<b>6</b>	<b>21</b>

## Actions completed in current financial year and outstanding

	Actions completed (since Sept 21)	Actions outstanding (Jan 22)	Actions outstanding:		
			On target: with HMICS for closure	On target	Overdue
Internal Audit	1	3	-	-	3
Audit Scotland	-	-	-	-	-
HMICS	2	4	-	4	-
ICO	3	13	-	10	3
National Records of Scotland	-	-	-	-	1
<b>Total</b>	<b>6</b>	<b>21</b>	<b>-</b>	<b>14</b>	<b>7</b>

## Complete actions

- Internal audit: one recommendation from the Legal Claims Handling Audit has been closed.
- The final two remaining recommendations from the Thematic Inspection of SPA have been formally discharged by HMICS. There are no remaining open recommendations from this report which represents a significant milestone for the SPA and demonstrates the significant progress made in recent years.
- Three ICO recommendations have been closed in relation to training plans and hardware/ software asset registers.

## New actions

- No new actions have been allocated to SPA since the ARAC in September 2021.

## Overdue actions

- ICO: further detail on the ICO actions is included in the following page.
- Internal audit: there are three overdue actions from the Data Protection Internal Audit relating to compliance monitoring, training and clarification of retention periods on the retention schedule. All actions are expected to be completed by April 2022.
- National Records of Scotland: To enable SPA to discharge the single outstanding recommendation input is required from National Archives to develop an MOU. To date National Archives have not been in a position to support this work, however, they are expected to be in a position to support in the coming months.

# Further detail on progress: *ICO actions update*

There were 75 recommendations arising from the original 2018 ICO audit of the SPA plus one recent finding relating to mobile phone data extraction.

Both SPA official and ARAC have been focused on progress of these actions. Of the original 75 recommendations made, 12 (16%) remain outstanding in addition to one recent new finding. Whilst progress to fully close recommendations has been slow, there has been significant progress made in recent months such that we are now close to discharging the majority of remaining actions.

The SPA has also developed an information management strategy which takes on board the findings from this audit and focuses on continuous improvement in the service.

## Progress on outstanding ICO recommendation by theme:

### Training

	Sep 21	Jan 22
Actions outstanding	4	3

- The recommendations relate to the updating, releasing and completion of information security elearning training.
- There have been ongoing challenges with the SPA receiving central training staff time to update the elearning packing particularly given recent competing operational policing training priorities.
- Alternative arrangements have now been agreed and the training has been updated and is expected to launch by March 2022. This will allow these actions to be closed.

### Asset registers

	Sep 21	Jan 22
Actions outstanding	5	3

- These recommendations relate to SPA access to up to date and accurate hardware and software asset registers.
- Police Scotland ICT has had ongoing projects to develop asset registers.
- SPA now has access to updated registers allowing two actions to be closed. The remaining actions relate to SPA performing checks over the completeness and accuracy of the asset registers. An annual audit plan will be developed for 2022/23 which will incorporate these audits and will allow these recommendations to be fully discharged.

### Auditing

	Sep 21	Jan 22
Actions outstanding	4	4

- These recommendations related to conducting information security audit / compliance testing.
- This includes the auditing of: security contracts, compliance with security controls (ISO 20001, clear desk policy, etc) and disclosure to third parties.
- SPA did not have the staff capacity to conduct this work, however, as part of the SPA 2020 restructure a new information assurance officer post has been recruited and joined in December 2021. Their role will include undertaking information security audit work.
- In addition, a key feature of the new information management strategy is the development and delivery of a formal audit plan.

### SLA - section 83 agreement

	Sep 21	Jan 22
Actions outstanding	2	2

- There are two recommendations related to the lack of a contract / SLA for the services provided to SPA from Police Scotland's IT team.
- A broader section 83 agreement has been prepared and approved by SPA that includes all services provided by Police Scotland.
- This exercise has now been subsumed within the governance review project and further work is required dependant on any changes agreed from this review.