





<b>Meeting</b>	<b>SPA Audit, Risk and Assurance Committee</b>
<b>Date and Time</b>	<b>20 January 2022</b>
<b>Location</b>	<b>By Video Conferencing</b>
<b>Title of Paper</b>	<b>Police Scotland Audit and Improvement Recommendations Tracker – Q3</b>
<b>Presented By</b>	<b>ACC Professionalism and Assurance</b>
<b>Recommendation to Members</b>	<b>For Discussion</b>
<b>Appendix Attached:</b>	<b>YES</b> Appendix A – Recommendations Tracker plus Dame Elish Angiolini Summary Appendix B – Summary of Achievements Appendix C – Summary of Delayed Recommendations

**PURPOSE**

The purpose of this paper is to provide the Audit, Risk and Assurance Committee with an update of current open recommendations from all audit and improvement activity.

## 1 BACKGROUND

- 1.1 The Tracker is provided at **Appendix A**. This provides a breakdown of all publications, risk and a summary of progress. We are now including an extract from the Dame Elish Angiolini recommendations at the end of the Tracker. This shows the recommendations being tracked that relate to Police Scotland only along with their current status.
- 1.2 All recommendations are assessed in terms of the risk they present to Police Scotland so that we can prioritise activity. Internal Audit use the following risk grading structure and this has been applied to all recommendations within Police Scotland, regardless of whether they have been made by Internal Audit. This ensures a consistent approach is taken, allows for prioritisation and enables comparisons to be made.

	Very high risk exposure - major concerns requiring immediate senior attention that create fundamental risks within the organisation
	High risk exposure - absence / failure of key controls that create significant risks within the organisation.
	Moderate risk exposure - controls are not working effectively and efficiently and may create moderate risk within the organisation
	Low risk exposure - controls are working effectively, but could be strengthened to prevent the creation of minor risks or address general house-keeping issues

## 2 FURTHER DETAIL ON THE REPORT

### 2.1 Completed Recommendations

**31 recommendations closed at this review** – 1 Very High, 3 High, 26 Medium and 1 Low Risk

The improvements are broadly categorised as follows:

- o Improved service delivery linking to Outcomes 1 and 2 of the Joint Strategy.
- o Improved working partnerships linking to Outcome 3.
- o Improvements to supporting our people linked to Outcome 4.
- o Improved governance, compliance and assurance processes linked to Outcome 5.

More detailed information on some highlights as a result of completing these recommendations is provided at **Appendix B**.

## 2.2 Open Recommendations Summary

There are **132 recommendations open**. The following provides a summary of progress.

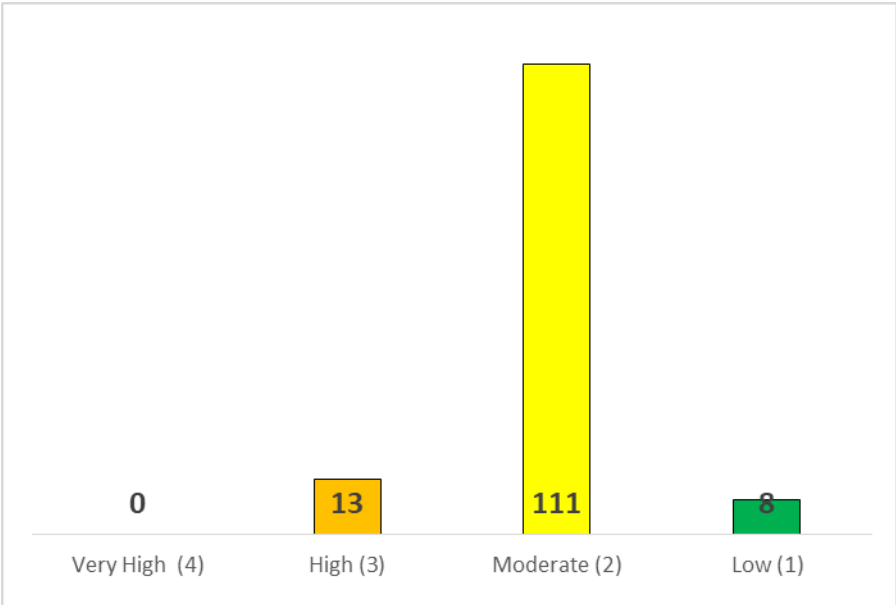
	Very High	High	Medium	Low	Total
On track	-	11	104	6	<b>121</b>
Delayed	-	-	5	1	<b>6</b>
Missed this Quarter	-	2	2	1	<b>5</b>
<b>Total Open</b>	-	<b>13</b>	<b>111</b>	<b>8</b>	<b>132</b>

- **90% of recommendations** due for closure by 31 December 2021 were achieved. 41 recommendations were due to close up to and including 31 December 2021. 31 are confirmed as closed, we are working on evidence packs for 5 recommendations to send to HMICS and 5 have not been achieved and are still in progress.
- In relation to the **5** not achieved, **2** of these relate to high risk recommendations. A detailed update and explanation is provided at Paragraph 2.4 below.
- **6** recommendations are delayed and have previously been reported. These are provided at Paragraph 2.5 below and Appendix C.
- **11%** of all open recommendations have a very high or high risk status.

## 2.3 Recommendations by Risk Status

Graph 2 shows the number of open recommendations according to risk. There are **13 recommendations** with a high risk rating. These represent 10% of all open recommendations.

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## 2.4 Recommendations Not Achieved by 31 December 2021

A total of 5 recommendations missed their date of completion this quarter.

REPORT / DATE	RECOMMENDATION	RISK	DATE	UPDATE
Benefits Realisation Internal Audit October 2020	<p><b>3.2 Performance Impact of Realised Benefits</b></p> <p>We have previously raised recommendations in our 2019/20 review Demand and Productivity that relate to the development of measures of demand and capacity and the implementation of the Resource Allocation Model, which we understand will provide a greater ability to view organisational performance from a productivity and efficiency perspective.</p>	High	<p>31 Dec</p> <p>June 2022</p>	<p>We are not able to demonstrate achievement of this recommendation. Work is progressing but is extremely complex.</p> <p>Continuous improvement in this area remains ongoing through the refresh of the performance framework and ongoing Strategic and Organisational Assessment processes. Planning for the Strategic Assessment and Organisational Assessment to support the 5 year business plan is underway. The organisational assessment will consider benefits realised to date, working with subject matter experts to assess impact on organisational performance where possible. This will provide an enhanced evidence base for effective reporting.</p>

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<p>Benefits Realisation Internal Audit October 2020</p>	<p><b>5.1 Organisational Performance Reporting</b></p> <p>Performance reporting should be revised to reflect realised benefits in terms of their impact on organisational performance. This may be contingent on the implementation of actions to address MAP 3.1 and 4.1, which would provide for the availability of relevant data to carry out this analysis.</p>	<p>High</p>	<p>31 Dec <del>Dec</del> June 2022</p>	<p>The Police Scotland Performance Framework and Performance Reporting takes account of productivity/capacity gains where this information is available, working with the DPU, PMO and taking account of Workforce Planning. This is an area where we will continue to improve upon and mature.</p>
<p>Legal Claims Internal Audit August 2021</p>	<p><b>3.3 Version Control</b></p> <p>As a matter of best practice, we recommend that both teams review their existing documentation, and record:</p> <ul style="list-style-type: none"> <li>• The document owner;</li> <li>• The date of last review;</li> <li>• The date of approval by the Head of Legal Services; and</li> <li>• The timescale for the documents to be re-reviewed, updated and approved.</li> </ul>	<p>Low</p>	<p>31 Dec <del>Dec</del> March 2022</p>	<p>Once all guidance has been updated this will be reviewed as a matter of good housekeeping.</p>
<p>Legal Claims Internal Audit August 2021</p>	<p><b>4.2 Reporting Criteria</b></p> <p>Police Scotland should agree a set of principles for identifying claims of interest to the SPA Legal Committee and PPMB, notwithstanding their potential financial value.</p> <p>These principle should be documented and periodically reviewed. The purpose of the principles should be to provide guidance as to the information needs and expectations of the committees, and not to inhibit the Head of Legal Services from bringing issues to the attention of these groups should they feel it is warranted for other reasons.</p>	<p>Med</p>	<p>31 Dec <del>Dec</del> March 2022</p>	<p>Partially complete pending updating documentary guidance</p> <p>The agreed set of principles have been determined and align with those set out in the SPA/Police Scotland Joint Memorandum of Understanding (published 30th June 2021).</p> <p>We still need to confirm the update to our internal procedures to reflect this.</p>

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Legal Claims Internal Audit August 2021	<b>5.1 Review of Claims Outcomes</b> We recommend that Police Scotland adopt a process which documents any retrospective review of Legal Claims which is performed, and any outcome or action. The review process should be based on a defined and documented set of principles, agreed with stakeholder groups.	Med	31 Dec Sept 2022	Dependency with Organisational Learning structure  We will await the formal development of an organisational learning structure and we will feed in learning to that process. Any immediate learning in the meantime will be shared appropriately and raised through our governance structure for recording purposes.
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### 2.5 Delayed Recommendations

A full list of recommendations that have incurred delays as previously reported is provided at **Appendix C**. There are no high risk recommendations to report here.

### 2.6 Dame Elish – Complaint Handling Recommendations

Included within the tracker (Appendix A) is further detail in relation to the recommendations being monitored from the Dame Elish Angiolini Complaint Handling report. This list only includes oversight of those recommendations where Police Scotland are directly responsible or have a role to play in partnership with another organisation.

A Police Scotland Strategic Oversight Group exists to ensure Senior Executive oversight over directing, monitoring and co-ordinating any change to policy and practice as a result of implementing the recommendations. It enables key discussions and communication with our internal partners on the full implementation, learning and improvement and the wider impact this may have. This approach reflects the scale and importance of the learning and our commitment to improvement.

We have sought support from HMICS to provide an independent layer of assessment over the recommendations we proposed for closure and the impact of our changes. This assessment is included within our highlight reports to Scottish Government.

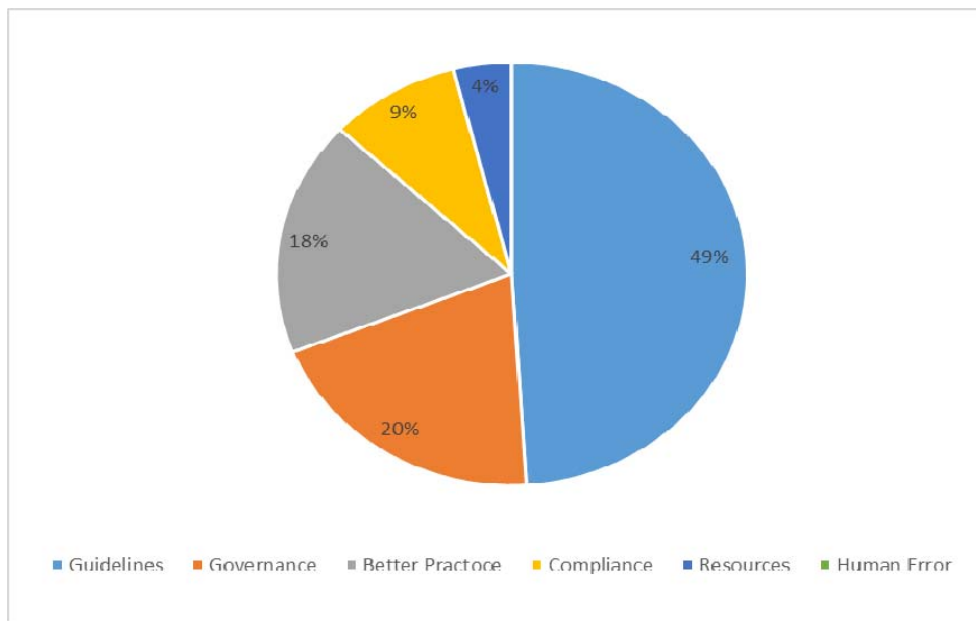
The second Thematic Progress Report was published on 16 December 2021 by Scottish Government following approval by the Ministerial Group at their meeting on 2 December 2021. This progress report approved the discharge of 6 Police Scotland recommendations and 1 joint

recommendation where Police Scotland had an input. A summary of those closed is provided within Appendix B to this report.

## 2.7 Themes and Dependencies

All of our recommendations are assigned a theme. This allows us to draw out learning about our organisational performance in respect of our Corporate Governance responsibilities. These are based on the following and they are derived from standard audit terminology.

- Compliance – to deal with non-compliance of prescribed procedures, rules and standards.
- Guidelines – need for improvement to written procedures, strategies, policies and guides to staff.
- Governance – need for better accountability, supervision or management oversight to prevent errors and wrongdoing.
- Human Error – where mistakes have occurred.
- Better Practice – Opportunities to improve in order to reach recommended best practice.



In the last year the largest proportion of recommendations have related to Guidelines meaning there was a lack of or insufficient documented approaches, strategies or operating procedures to govern what, why and how activities are progressed. Approximately a third of these were rated as High Risk meaning there was nothing in place.

There was a slight increase in the number of compliance related recommendations when compared to previous years. A key theme emerging related to the absence of quality assurance frameworks at the first line of defence. In order to address these areas we have worked with business areas to guide and support them in addressing these



points.

As well as these high level themes we also monitor topical themes. That is issues that are repeatedly made across a number of publications or recommendations relating to a business area or a process. During the course of our review the following themes have emerged:

### **Diversity, Equality, Inclusion and Ethics and Values**

- Improve understanding of both workforce and complainants diversity data to drive service delivery.
- Improve understanding of diversity demographics and demonstrate a more inclusive approach both internally and externally.

### **Demand**

- Better use of demand and analysis to drive service delivery and organisational/ functional design.
- More consistent use of demand data at local levels to determine capacity and resourcing requirements.

### **Data**

- Quality and overall use.
- Performance and trends – building data sets to understand performance and use this together with benchmarking to compare.
- Improve use of trend data to inform decision-making for resourcing, tackling priority areas and tasking.
- Quality Assurance and compliance in a number of areas.
- Improvements in public reporting for greater transparency.

### **Development**

- Organisational alignment, working more holistically and removing silo working.
- Training – equipping our staff in respect of core leadership training, mental health and more specialist training in respect of crime recording, hate crime/incidents, equality and key aspects of service delivery.

It is important to remember that audit and inspection programmes are risk based and therefore the emergence of these as themes is influenced by the topics selected for audit and inspection.

In order to address these comprehensive work plans, programmes and project were already underway or have been put in place as a result:

- Independent Review Group for EDI, governance structures refreshed and strengthened with supporting work plans and EDI well embedded in leadership training.
- Data Drives Digital project.
- Ongoing work to resource and implement our Demand and Productivity ambitions.
- Development of an Organisational Learning Framework

### **3 FINANCIAL IMPLICATIONS**

- 3.1 There may be financial implications associated with implementing recommendations from Audits/Inspections and these are detailed where relevant within Appendix A – Recommendations Tracker.

### **4 PERSONNEL IMPLICATIONS**

- 4.1 There may be personnel implications associated with implementing recommendations from Audits/Inspections and these are detailed where relevant within Appendix A – Recommendations Tracker.

### **5 LEGAL IMPLICATIONS**

- 5.1 There may be legal implications associated with implementing recommendations from Audits/Inspections and these are detailed where relevant within Appendix A – Recommendations Tracker.

### **6 REPUTATIONAL IMPLICATIONS**

- 6.1 There may be reputational implications associated with implementing recommendations from Audits/Inspections and these are detailed where relevant within Appendix A – Recommendations Tracker.

### **7 SOCIAL IMPLICATIONS**

- 7.1 There may be social implications associated with implementing recommendations from Audits/Inspections and these are detailed where relevant within Appendix A – Recommendations Tracker.

### **8 COMMUNITY IMPACT**

- 8.1 There may be a community impact associated with implementing recommendations from Audits/Inspections and these are detailed where relevant within Appendix A – Recommendations Tracker.

### **9 EQUALITIES IMPLICATIONS**

- 9.1 There may be equality implications associated with implementing recommendations from Audits/Inspections and these are detailed where relevant within Appendix A – Recommendations Tracker.

**RECOMMENDATIONS**

Members are requested to note the report.

**APPENDIX B – SUMMARY OF ACHIEVEMENTS**

**Events (HMICS)**

<b>Area for improvement</b>	<b>What we did and the impact</b>	<b>Impact Factor</b>
<p>R001 - Simplify Resourcing Events</p> <p>Police Scotland should simplify the resourcing of events across Scotland by creating consistent national processes, structures and roles.</p>	<p>We put in place a single reporting structure for Events that allows for a more consistent operating model across the country along with equity of service.</p> <p>We established a short life working group to review processes for resourcing, demand and deployment. Following agreement we documented these updated procedures within national guidance and process maps.</p> <p>This brings consistency across the country and provides clarity and guidance to staff on standards of service.</p> <p>The Resource Deployment Unit restructure is further enhancing the resourcing of events.</p>	<p>Improved service delivery</p>
<p>R005 - Update SOPs</p> <p>Police Scotland should update the Standard Operating Procedures relating to Event Notification and Classification and Cost Recovery.</p>	<p>We have clarified our position in relation to the classification of events and cost recovery processes. We have produced updated divisional guidance which is available to staff which provides up to date information of processes.</p>	<p>Improved service delivery</p>
<p>R010 - Holistic assessment of risk and demand</p> <p>Police Scotland should devise an approach to identify resources from divisions based on a holistic assessment of risk and demand on divisions at the material time.</p>	<p>An Events Daily Co-ordination Meeting has been established to improve our understanding of risks and demands to allow more effective resource planning for events.</p> <p>This single method of bringing interested parties together for the purposes of determining resourcing is helping inform decision making based on a collective view of demands and issues affecting geographical areas. This approach is helping to provide decisions that are fair, consistent and with a focus on officer wellbeing and other divisional commitments.</p>	<p>Improved service delivery</p> <p>Improved support to our people</p>

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<b>Area for improvement</b>	<b>What we did and the impact</b>	<b>Impact Factor</b>
<p>R011 - Review Resourcing Model</p> <p>Police Scotland should review the regional resourcing model to find a more effective way to identify resources and rationalise the varying processes to ensure the most appropriate resource is allocated to the event.</p>	<p>We have reviewed the structure of resourcing and put in place a single national model that supports more effective use of resources.</p> <p>We have reviewed processes and rationalised these within updated process maps.</p> <p>We have documented approaches for effectively and consistently resourcing events and this is providing greater efficiency, flexibility and equity as well as being more considerate of officer wellbeing.</p>	<p>Improved service delivery</p> <p>Improved support to our people</p>
<p>R014 - CPD for event commanders and planners</p> <p>Police Scotland should review whether event commanders and event planners would benefit from continuous professional development or refresher training to maintain up to date skills and knowledge and promote a consistent approach across Scotland to the resourcing of events.</p>	<p>A review was undertaken which did establish a need for continuous professional development and refresher training for Event Commanders. A new approach has been proposed that professionalises this discipline in line with other specialisms and provides a consistent approach to managing risk across Scotland. Staff will maintain their skills and develop knowledge and competence through a combination of formal training and shared learning.</p>	<p>Improved service delivery</p> <p>Improved support to our people</p>

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<b>Area for improvement</b>	<b>What we did and the impact</b>	<b>Impact Factor</b>
R015 - Cost Recovery  Police Scotland should develop a central point for cost recovery, including review, application and audit, which would provide consistency across Scotland.	<p>Event Cost Recovery is now managed centrally under the direct leadership of a Superintendent.</p> <p>An Events Cost Recovery Short Life Working Group was established.</p> <p>A full analysis of events and financial impact has been undertaken by EERP and Finance and documented within the full review.</p> <p>An Events Cost Recovery Protocol and Governance process was presented at SLB in November 2020 and approved.</p> <p>However, a decision was taken not to implement due to the impact on the sector arising from the pandemic. This decision is being reviewed on a 3 monthly basis to establish the most appropriate time, in consultation with partners, to implement the protocol.</p> <p>The detailed review has identified and incorporated best practice in respect of event charging with a view to ensuring greater levels of consistency, application, fairness and improved governance and oversight.</p>	Improved service delivery

**Leadership, Training and Development (HMICS)**

<b>Area for improvement</b>	<b>What we did and the impact</b>	<b>Impact Factor</b>
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<p>R03 - Review of Leadership and Talent Function</p> <p>Police Scotland should review the Leadership and Talent function, and consider if it has adequate resources and sits in the correct place in the organisation's structure, to allow it to fulfil its important responsibilities</p>	<p>The separation of Leadership and Talent from the wider LTD function along with the appointment of a dedicated Head of Leadership &amp; Talent raises the profile of the function and ensures equal status against all other People &amp; Development priorities.</p> <p>Additional resources were appointed to deliver against the transformation priorities which demonstrates our commitment to delivering transformation in this important area without compromising business as usual service delivery.</p>	<p>Improved support to our people</p>
<p>R04 - Leadership Training - Senior Police Officers and Staff</p> <p>Police Scotland should ensure senior police officers and support staff are provided with Leadership Training beyond technical training for specific roles, as a matter of urgency.</p>	<p>We have significantly invested in leadership training by industry experts that brings up-to-date thinking and concepts to more adequately equip our leaders in strategic thinking, self-awareness and emotional intelligence.</p> <p>This leadership programme has been delivered virtually in bite-size segments, in order that it is not too onerous on individuals' time. It covers core elements before providing a self-service type development opportunity, along with group coaching so the effects of this style of training are longer lasting.</p>	<p>Improved support to our people</p>



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<p>R05 - Leadership Training - Officers and Staff</p> <p>Police Scotland should ensure that all police officers and support staff are provided with appropriate leadership training prior to undertaking a supervisory role.</p>	<p>In Feb 2021 build of the refreshed First Line Managers course was completed, moving it to a blended learning model, namely:</p> <ul style="list-style-type: none"> <li>• 2 day Online Distance Learning programme (self-serve via Moodle to be completed within 12 weeks)</li> <li>• 2 day face-to-face Consolidation Workshop (locally delivered subject to Covid-19 restrictions)</li> </ul> <p>Learning content has been revised to bring in modern leadership concepts to the course. The aims and outcomes of the refreshed course have not changed from the original, with the overall ethos remaining - to provide delegates with the skills, knowledge and behaviours required to effectively carry out a supervisory role within Police Scotland.</p> <p>As a result of the blended delivery model, we are able to provide training to a larger number of staff within a shorter timeframe to allow staff to access this valuable training at a time that is most beneficial to them.</p> <p>The delivery method together with more detailed demand planning/projections will allow us to deal with demand more efficiently and effectively.</p> <p>The distance learning approach is more accessible and flexible:</p> <ul style="list-style-type: none"> <li>• Staff participate at a time that suits them. They can spread the commitment over a longer period of time.</li> <li>• Supports staff flexible working patterns and more conducive for staff with caring responsibilities. It opens up the course to staff who may have found the time away from home prohibitive to completion.</li> <li>• It supports staff wellbeing.</li> <li>• It reduces abstractions for Divisions and Departments.</li> <li>• It provides a modern approach to training.</li> </ul>	<p>Improved support to our people</p>
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<p>R10 - Diversity Training - Leadership Courses</p> <p>Police Scotland should ensure that diversity training is provided and mainstreamed into leadership courses at all levels as a matter of urgency.</p>	<p>Providing ED&amp;I content through all of our Leadership programmes demonstrates our commitment to embed ED&amp;I within policing and provides consistency of approach. It ensures colleagues who may not have experienced this in previous versions of First Line Management training will be provided with this support throughout their development and progression.</p>	<p>Improving service delivery Improved support to our people</p>
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**Complaints Handling (Dame Elish Angiolini)**

<b>Area for improvement</b>	<b>What we did and the impact</b>	<b>Impact Factor</b>
<p>R3 Post Incident Procedures (PIP)</p> <p>Other than for pressing operational reasons, police officers involved in a death in custody or serious incident, whether as principal officers or witnesses to the incident should not confer or speak to each other following that incident and prior to producing their initial accounts and statements on any matter concerning their individual recollections of the incident, even about seemingly minor details.</p>	<p>Post Incident Procedures Professional Reference Group (PRG) continues to provide Police Scotland Senior Executive appropriate strategic oversight and direction to ensure effective PIP management and deployment. Post Incident Procedures (PIP) guidance and toolkit revised. Force-wide and additional communications issued to Contact, Command &amp; Control Division (C3) in respect of PIP. PIP Professional Reference Group and Police Scotland internal Practitioner Working Group established and Terms of Reference agreed. Post Incident Procedures have been put in place.</p> <p>The promotion and force-wide communication of PIP has increased awareness and understanding of each officer's responsibilities and decreased the risk of conferring and the legal implications of this, as well as enhanced focus on staff welfare after a traumatic incident.</p>	<p>Improved governance, compliance and assurance processes</p>

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Area for improvement	What we did and the impact	Impact Factor
<p>R6 PSD Induction Training</p> <p>All officers and support staff in Police Scotland's Professional Standards Department (PSD) should receive comprehensive induction training on taking up post and regular refresher development opportunities thereafter.</p>	<p>A comprehensive 5-day induction training package was carried out and one-day course has been developed to provide training for new staff members. A refresher training programme has also been established, with Continued Professional Development events taking place on a regular basis. Professional Standards Department (PSD) Training Working Group and Training cadre has also been established, comprising PSD staff, providing development and enhancing training programmes. All training is supported with significant ongoing input from both PIRC &amp; CAAPD.</p>	<p>Improved support to our people</p> <p>Improved service delivery</p> <p>Improved partnership working</p>
<p>R9 First Line Resolution (FLR)</p> <p>It is inappropriate to involve local officers in the frontline complaints process and therefore all frontline resolution should be carried out by Professional Standards Department.</p>	<p>New revised frontline resolution (FLR) process commenced on 3rd May 2021, in order to broaden the opportunities where FLR can be used. FLR has been revised in conjunction with the new complaint handling process, including the creation of the National complaint and Resolution Unit (NCARU) which facilitates the requirement for all FLR to be dealt with by Professional Standards department.</p> <p>The impact of which is staff are experienced and more consistency in achieved in resolution. Statistics are monitored closely to identify geographical trends and measures can be taken to address. The focus is on service delivery and to increase use of FLR to the satisfaction of those complaining.</p>	<p>Improved service delivery</p>

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<b>Area for improvement</b>	<b>What we did and the impact</b>	<b>Impact Factor</b>
<p>R21 Whistleblowing</p> <p>Whistleblowing can be an indicator of what is happening within an organisation and therefore Police Scotland should review and audit its whistleblowing arrangements and data on a regular basis.</p>	<p>Whistleblowing Guidance has been revised and significant training and awareness sessions provided on various platforms. Self-assessment process established to effectively manage and audit processes, with benchmark undertaken in June 2021 to identify areas of improvement and presented to the SPA Audit, Risk and Assurance Committee (ARAC). Guidance will be reviewed annually, with enhanced engagement in terms of Whistleblowing awareness to be included in established supervisory and leadership training and the feedback process established to ensure improvement opportunities captured. Bi-annual reports will be submitted to SPA. Although this recommendation is aimed primarily at Police Scotland, the SPA has also made arrangements for annual reporting on its whistleblowing policy to the Audit Risk and Assurance Committee, with the first report submitted in July 2021.</p> <p>The completion of this development activity will allow for the PSD Auditor to maintain these processes as BAU and provide audit assurance, ensuring organisational risks are effectively managed and will be responsible for making recommendations to improve the overall internal control environment and to improve operational performance across the Professional Standards Department.</p>	<p>Improved governance, compliance and assurance processes</p>

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<b>Area for improvement</b>	<b>What we did and the impact</b>	<b>Impact Factor</b>
<p>R33 Local Scrutiny Committees Local scrutiny committees should consider, in consultation with Police Scotland's local divisional commanders and the COSLA Police Scrutiny Convenors Forum, what further complaints information or discussion would assist their scrutiny of the police.</p>	<p>The Professional Standards Department monthly Divisional Commanders' Report has been redesigned to be more reflective of the SPA Complaint &amp; Conduct Committee quarterly report. All Local Commanders have provided confirmation that the redesigned report meets the needs of their local scrutiny committees at divisional level.</p> <p>The impact of this type of performance reporting has increased data sharing with key partners. Allows enhanced scrutiny of each Division's performance and increased accountability.</p> <p>The monthly report allows commanders to assess their division's performance in respect of complaints regularly and can address any emerging issues or trends at an early opportunity.</p> <p>This will be raised at COSLA to add additional layer of reassurance that the information is fit for purpose and provides suitable, relevant and useful information for local scrutiny boards.</p>	<p>Improved governance, compliance and assurance processes</p>

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<b>Area for improvement</b>	<b>What we did and the impact</b>	<b>Impact Factor</b>
<p>R62 Police Scotland should appoint a PSD training officer to maintain the momentum in training and development arising from its internal Risk, Assurance and Inspection (RAI) team audit, and to liaise with the SPSO, the PIRC and the SPA on joint training, best practice and other relevant development opportunities.</p>	<p>Training officer appointed in National Support, Partnerships and Prevention Unit (NSPPU) with responsibility for coordination of all training across PSD business areas. Joint training now takes place on a regular basis.</p> <p>The Training Coordinator post has a positive impact in coordinating and delivering training departmentally and nationally across the organisation. This strengthens our partnership approach with key stakeholders and allows for joint training opportunities. This post provides a single point of contact for key partners to discuss and arrange joint training events and opportunities. It also provides a platform for partners e.g. Scottish Government, PIRC, SPSO, COPFS &amp; SPA to attend internal training events to enhance their own understanding of police processes.</p> <p>Feedback received through various forums about the positive impact the joint training has had and reflects the value of the training/learning co-ordinator role. Such feedback has been obtained from new PSD recruits following their induction training and is regularly referenced at multi-agency groups, for example, the National Complaint Handling Development Group where regular discussion is made and joint training opportunities arranged.</p>	<p>Supporting our people</p>

## **APPENDIX C – DELAYED RECOMMENDATIONS**

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REPORT / DATE	RECOMMENDATION	RISK	DATE	UPDATE
Undercover Policing HMICS Thematic	<p><b>R16 - Integrated Records Management System</b> Police Scotland should introduce an integrated record management solution for the management and supervision of undercover policing.</p> <p><i>Risk - During our fieldwork, we accessed a range of individual source documents and found that the information contained therein was inconsistent. There was also no simple means to read across the various systems to establish an accurate picture of activity. Police Scotland has recognised that the current processes are neither efficient nor effective and have produced a business case to update the existing source management ICT system to include undercover operations.</i></p>	Low	<p><del>Aug 2021</del> Mar 2022</p>	<p>Procurement for an undercover module from SMAN has been procured. Roll out was planned for completion August 2021 but there has been a delay due to ISO concerns which have now been fully investigated and a compromise solution has been identified.</p> <p>ICT are working on getting a testing/training version of Pegasus 5.1 in and around December which we can be used to fully test the system and every layer of the process from applicant to authorisation and everything in between as well as reviews and renewals. CAB anticipate 8–12 weeks testing (based on previous version upgrades) with a view of getting the live version and full data migration by March 2022.</p> <p>All of this is based on ICT keeping up their end of the bargain and they are fully aware of our need to meet the requirements of HMICS/IPCO. ACC Campbell has also been updated with the progress made and CAB are due to have another meeting with ICT at the end of the month to make sure they're still on target.</p> <p>The initial risks identified have been mitigated through a review and consolidation of paper record keeping and establishment of audit procedures.</p>
Events HMICS Thematic 2019	<p><b>R4 - Baseline and Risks</b> Police Scotland should develop a framework or means of guidance to event commanders regarding a baseline for the level of resource required and a means of considering the risks to the wider policing environment.</p> <p><i>Risk - Police Scotland should provide clear guidance regarding baseline officer levels for events in the form of a framework or matrix to guide commanders. This should include a means of considering the impact of that event on the wider community, so that account can be taken of the risks associated with the event balanced with the risks in the wider policing environment. This would assist commanders to demonstrate the rationale of their decision-making regarding the level of resource deployed and achieve greater consistency.</i></p>	Medium	Mar-22	<p><b>HMICS Assessment - Further Evidence Required</b></p> <p>We have reviewed our approach to determining resources for events and strengthened our governance around decision making. We have documented guiding principles so that there is greater clarity and consistency over application. We are working in partnership with other Divisions and Departments to arrive at decisions that support the delivery of events whilst also protecting service delivery.</p> <p><b>NEXT STEPS - We have reviewed with the business area to identify other sources of evidence from DPU that may assist with discharging this recommendation.</b></p>



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REPORT / DATE	RECOMMENDATION	RISK	DATE	UPDATE
Events HMICS Thematic 2019	<p><b>R8 - Demand Analysis Products for Events</b></p> <p>Police Scotland should progress demand analysis products to ensure that there is a consistent understanding of demand to inform the resourcing of events.</p> <p>Risk - If Police Scotland continues to use OBLs as a means of identifying available resource it is crucial that they are accurate and that the same principles are being used across Scotland.</p> <p>Police Scotland must understand demand to ensure that officers and staff are in the right place, and then agreement must be made regarding OBLs, including which officers and staff are included and what the exceptions are. OBLs will still not exclusively provide a true picture and must be combined with assessment of demand and risk in relation to the event and the wider policing environment.</p>	Medium	Mar-22	<p><b>HMICS Assessment - Further Evidence Required</b></p> <p>We have reviewed our approach to determining resources and strengthened our governance around decision making. We have documented guiding principles so that there is greater clarity and consistency over application. We are working in partnership with other Divisions and Departments to arrive at decisions that support the delivery of events whilst also protecting service delivery. Demand products to be expanded to National Divisions.</p> <p><b>NEXT STEPS - We have reviewed with the business area to identify other sources of evidence from DPU that may assist with discharging this recommendation.</b></p>
Greater Glasgow Custody 2019 HMICS	<p><b>Management of Queues at Custody</b></p> <p>Police Scotland should reconsider how it can better manage custody queue levels and provide radios to large custody centres to improve communication inside the centre and with local policing.</p> <p><i>Risk - Police Officers are non-productive whilst waiting to book in prisoners.</i></p>	Medium	<p><del>May 2020</del></p> <p><del>October 2021</del></p> <p>January 2022</p>	<p><b>PENDING CLOSURE</b></p> <p>A pilot of the Custody Co-ordinator has been ongoing for several months which was anecdotally making improvements to waiting times. A formal evaluation was hampered due to Covid restrictions so the pilot was extended in order to gather more data.</p> <p>The evaluation is now complete and there is a better understanding of the things that work as a result of the pilot. Some changes are being made as a result.</p> <p><b>NEXT STEPS - we are updating our evidence submission to re-submit to HMICS where it is expected this will now achieve closure. This will be submitted to CJSJ SMT on 12 January 2022.</b></p>

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REPORT / DATE	RECOMMENDATION	RISK	DATE	UPDATE
Review of Custody Centres 2018 HMICS	<p><b>R1 Custody Estate</b> Police Scotland should develop its custody estate strategy as a matter of urgency in order to address variations in provisions across the country and better meet demand.</p> <p><i>Risk - While Police Scotland has invested in its custody estate and closed centres it deemed unnecessary, challenges posed by the estate remain and cannot be easily fixed without significant further investment. In 2014, we noted that Police Scotland intended to develop a custody estate strategy. We recommended that it be finalised as a matter of urgency and that Police Scotland should work with the SPA and Scottish Government to prioritise investment in the custody estate.</i></p>	Medium	Mar-22	<p>Strategy provided along with Custody Investment Plan. What is lacking to finalise this recommendation is a supporting implementation plan outlining how the strategy will be measured, achieved, resourced and delivered.</p> <p><b>NEXT STEPS - Agreement reached between CJSD and Estates Change Manager to completely refresh this with a 5yr strategy. This will include timeline and plans in order to meet HMICS requirements for completion. Will be reported to SPA Policing Performance Committee on 17 March 2022.</b></p>
COP 26 Budget and Cost Allocation Internal Audit	<p><b>R1 Officer Numbers</b> Police Scotland should agree with the Cabinet Office a mechanism for resolving budget/funding variances which may emerge as the COP26 operational plan develops over time.</p> <p><i>Risk - there is a risk of challenge to operational plans should differences emerge between the Police Scotland and Metropolitan Police approach, although good working arrangements are in place to manage and mitigate this risk.</i></p>	Medium	Oct-21 Mar 22	<p>In hindsight the officer numbers and the budget completeness should have similar due dates. No significant update for officer numbers other than it is ongoing. All work has been completed to date based on the information we have but we will not have a final position until after the event itself.</p> <p>An extension up to 31/03/22, to reflect this was requested and approved by the Chief Financial Officer.</p>



















Internal Audit Recommendations Progress Tracker - December 2021											
Risk Grading Key	4	Very High Risk Exposure			3	High Risk Exposure		2	Moderate Risk Exposure	1	Limited Risk Exposure
Title & Date of Publication	Risk Rating	No. Open & RAG						Comments	Owner(s)		
		Total Closed	Pending	Closed Dec	Overdue	Delayed	On track				
Benefits Realisation October 2020 11 recommendations	1 4 3 3		1	1	2					We are not able to demonstrate achievement of all recommendation to date due to a number of factors. The ability to demonstrate efficiency savings and the impact on operational performance is a complex area that we continue to work on to improve.	Change / Strategy & Analysis
Performance Management January 2021 7 recommendations	2 5						2		5	Not yet due (target date set as 31/05/22). We have received updates for some recommendations and there is a milestone checkpoint at 31 December 2021 for R1.2 and R2.1	DoSA
Home Working Security March 2021 4 recommendations	4		3						1	R2.1 Mobile Device Management - this is a long term action and will be delivered as part of a wider project to deliver Office 365 - target date is March 2023.	CDIO
Environmental Impact August 2021 3 recommendations	2 1			1			1			2 due at end of December. Final closing statement provided for the 2 closures but one will depend on SLB approval.	CFO
Legal Claims Handling August 2021 8 recommendations	2 5 1			1	2		1		2	There are 2 recommendations that have not been fully met during the review period due to other competing demands. They are in progress and will be achieved in the next review period with the exception of the action with a dependency on organisational learning.	Head of Legal Services
COP26 Budget and Cost Allocation Model May 2021 3 recommendations	2 1							1	1	R01 completion date - 31 October 2021. NOW DELAYED - Date provided in error. Cannot be achieved until year end (March 2022). R02 and R03 completion date - 31 March 2022.	ACC COP26 / CFO
Data Quality and Integrity Sept 2021 6 recommendations										New actions added for tracking	ACC COP26 / CFO

Audit Scotland Recommendations Progress Tracker - December 2021														
Risk Grading Key	4	Very High Risk Exposure				3	High Risk Exposure		2	Moderate Risk Exposure		1	Limited Risk Exposure	
Title & Date of Publication	Risk Rating	No. Open & RAG						Comments	Owner(s)					
		Total Closed	Pending	Closed Dec	Overdue	Delayed	On track							
SPA Annual Audit Report 2019/2020	4							Recommendation previously closed but not fully discharged due to further work/evidence requested by Audit Scotland. Strategic Workforce Planning	DoPD					
10 recommendations (4 SPA, 6 PS)	3	3												
	2	1					1							
	1	1												
Title & Date of Publication	Risk Rating	No. Open & RAG						Comments	Owner(s)					
Total Closed	Pending	Closed Dec	Overdue	Delayed	On track									
SPA Annual Audit Report 2020/21 Interim Report ~ NEW	4							Employee validation checks (ghost employees) ongoing	CFO DoPD					
6 recommendations	6	3		2			1	Complete pending check of evidence Processing Payroll Checks Approval of Expense Claims						
Title & Date of Publication	Risk Rating	No. Open & RAG						Comments	Owner(s)					
Total Closed	Pending	Closed Dec	Overdue	Delayed	On track									
SPA Annual Audit Report 2020/21	4							On track	CFO DoPD Legal PPCW CDIO					
7 recommendations	7			3			4							

HMICS Recommendations Progress Tracker - December 2021														
Risk Grading Key	4	Very High Risk Exposure				3	High Risk Exposure		2	Moderate Risk Exposure		1	Limited Risk Exposure	
Title & Date of Publication	Risk Rating	No. Open & RAG						Comments	Owner(s)					
		Total Closed	Pending	Closed Dec	Overdue	Delayed	On track							
Undercover Policing February 2018 19 recommendations								R16 - Integrated Record Management System - PS requires to purchase an upgrade of the SMAN system v5.1, this is being set up on the cloud to allow testing to ensure it is fit for purpose first. A full timeline for implementation has been produced. Update and evidence (project timeline) that this has now been met provided and submitted to HMICS who will not discharge until the system has been tested and rolled out (Mid-2021). Pending. <b>NOW DELAYED</b>  R1 - Strategy and Implementation Plan - awaiting final sign off by ACC. Updated following HMICS review.	ACC OCCTI					
	6	6												
	4	4												
	9	7			1	1								
Review of Custody Centres 2018 August 2018 7 recommendations								For closure - R05 risk assessments recently returned from HMICS for further work they have requested clarification on the term of the QA role and a copy of QA framework in order to close. This is complete but needs evidence submission form.  Ongoing R01 estate strategy requires the Custody Improvement Plan (MED). All actions have been completed but not discharged until evidence of implementation plan which is still awaited. Decision made to refresh on a 5 year basis - <b>DELAYED</b>  R02 Inconsistent Practice - final pieces of evidence being gathered for closure. (LOW)	ACC Local Policing & CJS					
	4	2	1		1									
	3	2				1								
Review of Delivery of the Policing Plan March 2019 12 recommendations								One recommendation removed from report regarding Scottish Policing Model. All action complete and HMICS to maintain a watching brief on impact/progress.	Director of Strategy & Analysis/ CDIO  ACC OCCTI					
	12	11	1											
LP+ Greater Glasgow Inspection March 2019 11 recommendations								1 recommendation complete re Special Constables - evidence presented to HMICS re how PS has developed a strategy for Specials. This was reviewed during the Training and Development Phase 2 inspection activity and confirmed as complete.  1 recommendation is ongoing relating a review of Campus Officers - we are awaiting confirmation of a post implementation review.	ACC Local Policing West (1) / Director of P&D (1)					
	6	5	1											
	5	4				1								
Greater Glasgow Custody Inspection June 2019 5 recommendations								R03 analysis of risk assessments linked to R05 2018 - evidence form submitted and some evidence reviewed by HMICS at most recent inspections. Sufficient to close meantime.  Ongoing R01 custody queues - ORIGINAL TIMESCALE DELAYED DUE TO PANDEMIC. NOW COMPLETE AND EVIDENCE BEING GATHERED FOR HMICS REVIEW. Will be submitted for approval to SMT January 2022.  R05 improving quality of information - This has reliance upon QA Framework and QAI role. Development of a Strategic and Operational Self-assessment template and QA Universe document. (75% complete)	ACC Local Policing & CJS					
	1	1												
	4	1	1		1	1								
LP+ Events Inspection May 2019 15 recommendations								6 actions addressed and discharged. 1 recommendation relating to a briefing and learning process is in place but 1 final evidence request will complete the recommendation. This is being gathered.  2 recommendations remain open as evidence submitted only partially addresses the recommendations: Resourcing Framework or Matrix for Event Commanders Demand Products  We have reviewed these areas in discussion with DPU and there are some products available that will support the closure of the recommendations. Further discussions and testing required before submitting for closure.	ACC Operational Support					
	15	6	6		2	1								

HMICS Recommendations Progress Tracker - December 2021														
Risk Grading Key	4	Very High Risk Exposure				3	High Risk Exposure		2	Moderate Risk Exposure		1	Limited Risk Exposure	
Title & Date of Publication	Risk Rating	No. Open & RAG						Comments	Owner(s)					
		Total Closed	Pending	Closed Dec	Overdue	Delayed	On track							
Strategic Review of Custody May 2019 12 recommendations	3 2 7	3 1 5		1 1			1 1	<p>ONGOING</p> <p>R3 – Analytical assistance - There is a dependency here with the force-wide analytical review. An interim measure for a temporary post was not approved so other options to be considered and with HMICS agreement will be resubmitted to CJSD SMT for closure in January 2022.</p> <p>2 Proposed For closure</p> <p>R12 Strategic – ICT roadmap for custody – Complete</p> <p>R7 Use of Force Data - Now published - evidence submission prepared following QA of evidence.</p>	ACC Local Policing & CJS ACC Operational Support					
Online Child Sexual Abuse February 2020 & August 2021 11 recommendations	5 6	2 1					3 5	<p>The HMICS Assurance Review published and 3 recommendations discharged relating to governance, working relationships with the National Crime Agency and Undercover Capacity.</p> <p>All other recommendations recognised as partially complete. Assessment of residual action to be undertaken and action dates reset.</p> <p>Additional recommendation regarding wellbeing of officers (R11) added.</p>	ACC Crime and Public Protection / ACC OCCTI					
Training and Development-Phase 1 December 2020 17 recommendations	17	8		4			5	<p>A further 3 were submitted for closure in September (HMICS Approved to discharge) relating to Review of the Leadership and Talent Function Review of First Line Managers Training Review of Leadership Training</p> <p>One was submitted for closure in October (pending HMICS approval) relating to Diversity Training (Leadership) roles</p> <p>There are a further 3 recommendations which are at an advanced stage but will take many more months to evidence a change or outcome and dependent on project activity.</p>	DoPD ACC Partnerships and Prevention					
Scottish Crime Recording Audit March 2021 6 recommendations	6						6	<p>On track. Major dependency with new Crime Application</p>	ACC Major Crime and Public Protection					
Hate Crime June 2021 15 recommendations	15						15	<p>Action Plan finalised and submitted to HMICS.</p>	ACC Preventions, Partnerships and Community Wellbeing					
COP26 Assurance Review June 2021 1 recommendation	1			1				<p>Action Plan in place and managed by Op Urram Team. HMICS confirmed as complete. Any residual action will be picked up in post event debriefs/ post implementation reviews.</p>	ACC COP 26					
Demand, Analysis and Management July 2021 12 recommendation	1 11						1 11	<p>Action plan approved. Some early actions being prepared for closure.</p>	DoSA					

Other Recommendations Progress Tracker - December 2021										
Title & Date of Publication	Risk Rating	No. Open & RAG						Comments	Owner(s)	
		Total Closed	Pending	Closed Dec	Overdue	Delayed	On track			
Digital Forensics Working Group (DFWG)  April 2020  5 recommendations (1 SPA, 4 PS)	   							Actions due December 2022	ACC OCCTI	
			2					3		
Independent Complaints Handling Review  November 2020  26 Police Scotland only recommendations (+10 recommendations where we work in partnership with other organisations but do not have the lead)	   							Work ongoing. Separate Dashboard at the end of the Appendix to show progress.	ACC Professionalism and Assurance	
				6				20		
Civil Aviation Authority (CAA) Oversight Report 2019  September 2019 2 recommendations	   							Ongoing	ACC Operational Support	
								1		
								1		
ICO Mobile Phone Data Extraction by Police in Scotland  June 2021  6 recommendations	   							Ongoing	SCD	
								6		



**DAME ELISH COMPLAINTS HANDLING RECOMMENDATIONS - Summary of Progress Table**

	Total	Discharged	Proposed	Out for consultation	Open
Police Scotland PSD	18	6		1	11
Police Scotland P&D	6			3	3
Police Scotland Other Div/Dept	2				2
<b>Police Scotland Only Total</b>	<b>26</b>				<b>16</b>
Other Organisations + Police Scotland	10	5			5
<b>Total with partners</b>	<b>36</b>				<b>21</b>
Requires Legislation	7				7

**DAME ELISH COMPLAINTS HANDLING RECOMMENDATIONS - POLICE ONLY**

Due up to and including December 2021							
Count	Rec No.	Summary Title	Owner	Target Date	Status	Comment	Progress
1	77	Officer and Support Staff Welfare	PSD	Dec-21	Proposed for Closure	Complete - to be uploaded to Egress once approved by PSD	100%
Due up to and including end of March 2022							
2	4	Performance Reporting Trends	PSD	Mar-22	On track	On track - Evidence Pack to be collated for February meeting.	20%
3	14	Promotion Competencies	P&D	Mar-22	Proposed for Closure	Evidence collated and uploaded to Egress 30 November 2021	100%
4	16	Diversity of Disciplinary Hearings	PSD	Mar-22	On track	On track - Evidence Pack to be collated for February meeting.	40%
5	48	Publicise Right to Complain	PSD	Mar-22	On track	On track - Evidence Pack to be collated for February meeting.	20%
6	49	"Know Your Rights" - Website Development	PSD	Mar-22	On track	On track - Evidence Pack to be collated for February meeting.	40%
7	50	Third Party Reporting	PPCW	Mar-22	On track	On track - Evidence Pack to be collated for February meeting.	50%
8	61	Audit Arrangements - using Audit Scotland	PSD	Mar-22	On track		25%
9	78	Publish - Performance in dealing with complaints	PSD	Mar-22	On track		40%
10	67	Officer Mental Ill-Health Training	P&D	Mar-22	On track	Proposal developed - awaiting implementation	90%
11	PR 11	Body Worn Video	CJS	Mar-22	On track	On track - Evidence Pack to be collated for February meeting.	50%
Due up to and including end of June 2022							
12	15	Staff Survey – Under-represented Group Experience	P&D	Jun-22	Proposed for Closure	Evidence collated and awaiting approval to upload to Egress for consultation.	100%
13	66	Equality & Diversity Legislation and Unconscious Bias Training	P&D	Jun-22	On track		65%
14	PR 3	Skilled Complaints Handling Staff (Civilianisation)	PSD	Jun-22	On track		20%
Due up to and including end of December 2022							
15	17	Support for Internal Discrimination	PSD	Sep-22	On track		20%
16	5	Diversity Data Public Reporting – Expansion and Reporting	PSD	Dec-22	On track		20%
17	11	Sergeant Workload and Supervisory Ratios	P&D	Dec-22	On track		20%
18	18	Independent review of equality matters within Police Scotland	P&D	Dec-22	Proposed for Closure	Evidence collated and uploaded to Egress for consultation.	100%
19	19	Diversity Data Collection and Analysis (staffing)	PSD	Dec-22	On track		20%
20	60	Complaints - Demographic Analysis	PSD	Dec-22	On track		20%
COMPLETE							
21	3	Post-Incident Conferral	PSD	Complete	Discharged		100%
22	6	PSD Induction Training	PSD	Complete	Discharged		100%
23	9	FLR by PSD Staff	PSD	Complete	Discharged		100%
24	21	Whistleblowing	PSD	Complete	Discharged		100%
25	33	Local Scrutiny Committees	PSD	Complete	Discharged		100%
26	62	PSD Training Officer	PSD	Complete	Discharged		100%

**DAME ELISH COMPLAINT HANDLING RECOMMENDATIONS**  
**NOT FOR POLICE SCOTLAND TO LEAD**

Count	Rec No.	Summary Title	Owner	Theme	Status	Comment
1	2	CAAP-D	Non PS Lead	Audit & Review	Discharged	
2	13	PIRC access to Centurion database	Non PS Lead	Jurisdiction & Powers	Open	
3	32	SPA Role in complaints	Non PS Lead	Rights & Ethics	Open	
4	46	Direct Reporting to CAAP-D - Accountability and Publicity	Non PS Lead	Training & HR	Open	
5	47	Police Assaults Referral to PIRC (Articles 3 & 5)	Non PS Lead	Rights & Ethics	Discharged	
6	53	Recommendations based on Evidence from Other Jurisdictions	Non PS Lead	Conduct & Standards	Open	
7	65	Training and Development Opportunities PIRC	Non PS Lead	Training & HR	Discharged	
8	70	Independent Custody Visitor Third Party Checks	Non PS Lead	Rights & Ethics	Discharged	
9	80	Non statutory time limit for the submission of complaints by the public	Non PS Lead	Efficiency & Effectiveness	Discharged	
10	PR27	Audit	Non PS Lead	Audit & Review	Open	