SCOTTISH POLICE AUTHORITY
ÙGHDARRAS POILIS NA H-ALBA

Meeting	Audit, Risk and Assurance Committee
Date	20 November 2024
Location	Video Conference
Title of Paper	Police Scotland Audit and Improvement Recommendation Tracker – Q2 September 2024
Presented By	Assistant Chief Constable Professionalism and Assurance
Recommendation to Members	**For Discussion**
Appendix Attached	Yes **Appendix A Audit and Inspection Dashboard** **Appendix B Summary of High Risk 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.

Members are invited to discuss the progress detailed within the report.

1   BACKGROUND

1.1   A report on Police Scotland's management of recommendations made by external scrutiny bodies. The report is produced on a quarterly basis for Members review. A copy of the Dashboard is available at **Appendix A**.

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 organisanation
🟩	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   Refer to Appendix A – Audit and Inspection Recommendations Dashboard.

3.   FINANCIAL IMPLICATIONS

3.1   There <u>are no</u> financial implications in this report.

4.   PERSONNEL IMPLICATIONS

4.1   There <u>are no</u> personnel implications in this report.

5.   LEGAL IMPLICATIONS

5.1   There <u>are no</u> legal implications in this report.

6.   REPUTATIONAL IMPLICATIONS

6.1   There <u>are no</u> reputational implications in this report.

7.   SOCIAL IMPLICATIONS

7.1   There <u>are no</u> social implications in this report.

8.   COMMUNITY IMPACT

8.1   There <u>are no</u> community implications in this report.

9.   EQUALITIES IMPLICATIONS

9.1   There <u>are no</u> equality implications in this report.

10.   ENVIRONMENT IMPLICATIONS

10.1   There <u>are no</u> environmental implications in this report.

RECOMMENDATIONS

Members are invited to discuss the progress detailed within the report.

Audit and Inspection Recommendations Dashboard

Reporting Period: Q2 July – September 2024

# Police Scotland Recommendations Dashboard

Total	On Track	Change of Date	Very High Risk	Closed to date
304	167	137	3	70

Recommendations Management – Overview

- **304** recommendations open across 50 separate publications.

- **36** new recommendations were added since the last meeting. 10 Internal Audit, 15 HMICS and 11 Independent Reviews. Progress over the last year shows a slow down in the number of recommendations added with an increasing number closed.

- **11%** of recommendations have a Very/High Risk status. 3 recommendations are classified as Very High Risk. They relate to PAVA compliance and have been delayed. A summary of all High Risk Recommendations is provided at **Appendix B**.

- **70** recommendations have been closed in the quarter. This includes 41 with timescales due this quarter and a further 29 from the previous periods or closed early.

- **137** recommendations have incurred delays. 45% of the total.
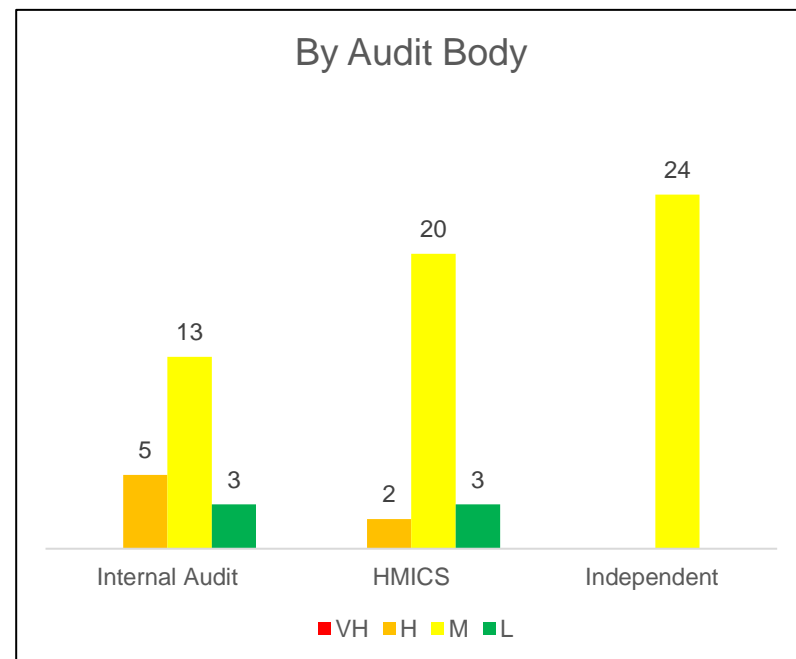
Open by Auditor/Inspectorate and Risk

Int Gov	Very High	High	Medium	Low	Advisory	Total
Internal Audit	3	7	45	17	0	**72**
HMICS		17	97	6	9	**129**
Independent		5	94	3	1	**103**
TOTAL	**3**	**29**	**236**	**26**	**10**	**304**

Trend - New v Closed

New (Q3): 107, Q4: 53, Q1: 69, Q2: 36
Closed: 17, 31, 61, 70
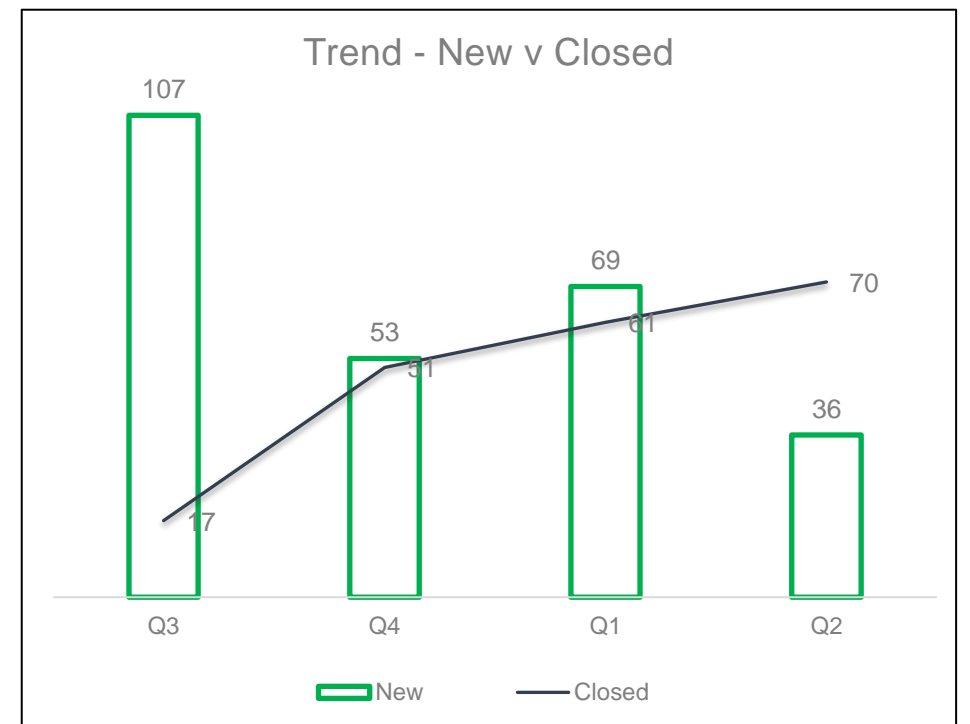
Closures – Overview

- **116** recommendations were due for closure up to the end of September 2024. 41 of these were achieved on time.

- **70** recommendations achieved in total across 17 different publications. Made up of 41 due in the quarter and 29 from previous periods or closed earlier than planned.

Risk Profile of Closures

By Audit Body

Category	VH	H	M	L
Internal Audit		5	13	3
HMICS		2	20	3
Independent			24	

Legend: ■ VH ■ H ■ M ■ L

Publications with Closures

- **All closures are independently assessed by the audit body. Recommendations do not get discharged unless they show (through supporting evidence) the changes made and their impact.**

- We've evidenced **positive changes and impact** in relation to
  - Introduced spot checks and reconciliations of grievance systems to strengthen quality control and improve accessibility of templates.
  - Delivered budget holder training to staff involved in making investment decisions.
  - Improved reporting and scrutiny of Ill Health Retirals.
  - Improved capacity around Best Value readiness and documented plans and introduced governance.
  - Enhancing training capacity through reviewing structures where training will be centralised.
  - Delivered more efficient working practices for staff at Custody centres through redesign of processes, workspaces and technology
  - Strengthened vetting processes through clarifying reporting of changes to circumstances. Designed a training programme for staff involved in Vetting Appeals to strengthen decision making.
  - Improved strategic workforce planning through the design of our Op Evolve programme and revised model of policing focusing on a prioritised roadmap
  - Improved the consistency through reviewing local policing appointments processes and improved service delivery by training Resolution Teams.
  - Consolidated guidance in relation to Hate Crime to improve accessibility and provide clarity around national v local priorities and evidenced delivery.
  - Introduce new contract for provision of anti-ligature suits to reduce risks in Custody centres.

Date Changes – Overview

Overview

- 137 recommendations have had date changes. This is an increase since the last report and has been increasing over the last year.

- 12% of all date changes have a Very High/High Risk status.

- Complexity, re-prioritisation linked to budget, dependencies with other work and the movement of staff are some of the main reasons why recommendations are delayed.

- We have carried out deep dives to establish
  - If the recommendation remains relevant and achievable
  - The dependencies with other work and if repeated or superseded by recommendations from other bodies
  - The barriers to delivery
  - The steps that can be taken to accelerate
  - There is planned and ongoing activity to achieve the outcome
  - If the work has stalled without valid reason
  - The evidence needed to show a change.

- The Audit Management Team have reviewed some processes and practices and are drafting a re-set plan to make improvements along with aligning recommendations to the Business Plan milestones to support prioritisation.

Risk Profile of Date Changes by Audit Body
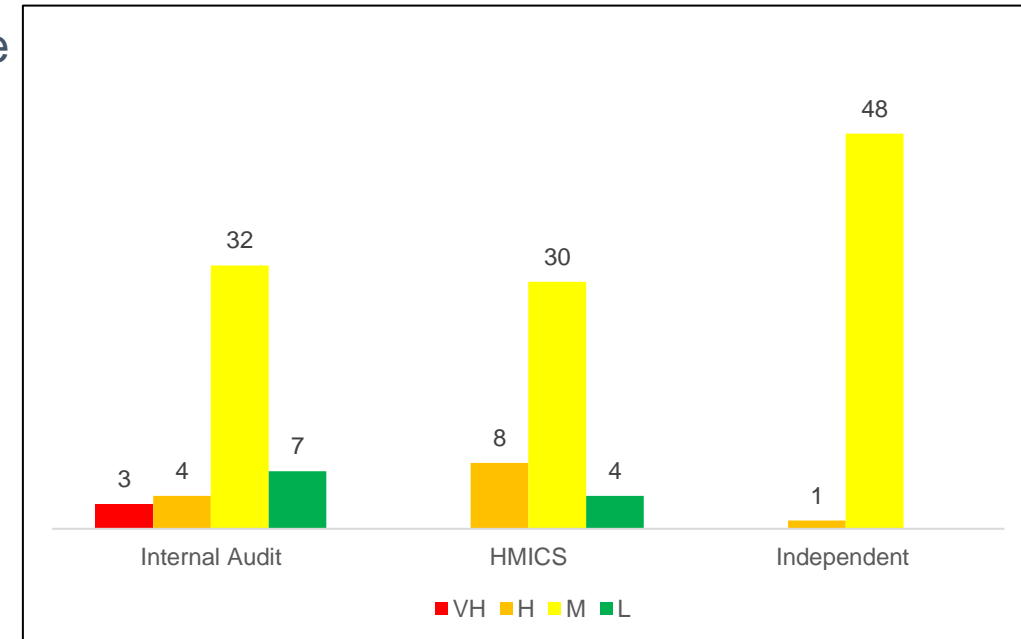
Delays – Trend
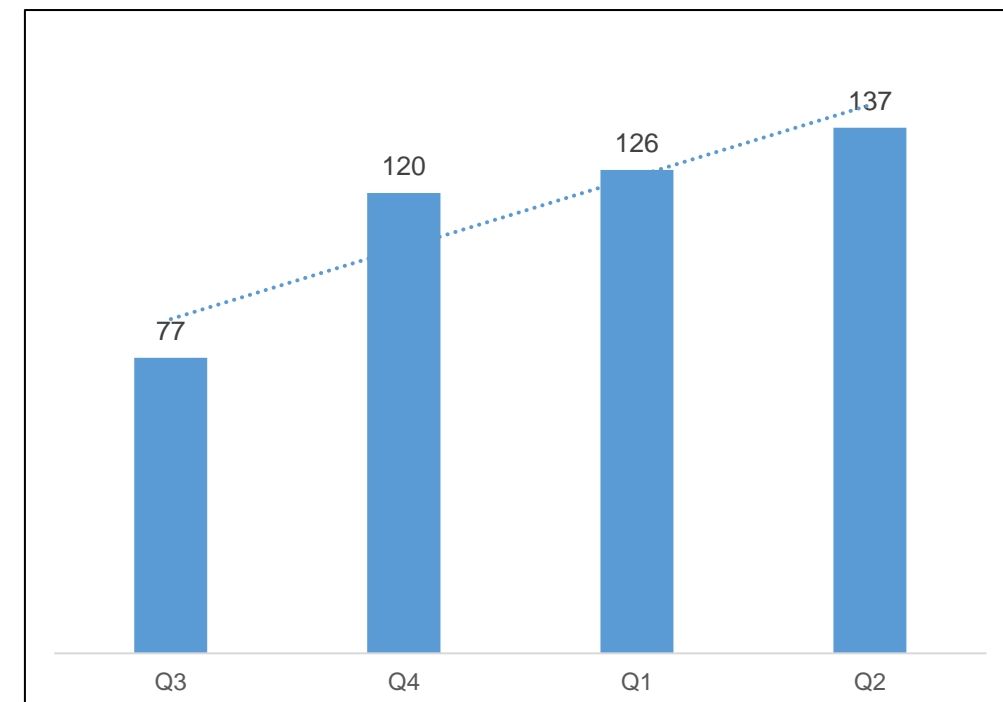
Delays to highlight

By Risk

Compliance PAVA Internal Audit – 5 recommendations remain open relating to controls around PAVA and are estimated to be delivered 1 year after the original timescale.

An opportunity to deliver a more robust process through the introduction of an automated tracking system extended the timeframe for delivery. Interim controls have been introduced as we roll out at pace across the organisation. Ownership has been subject to detailed consideration and has delayed the finalisation of the SOP to ensure buy in and new controls can be managed. Although controls were in place we have taken the opportunity to review these comprehensively to ensure they are proportionate and effective.

Vetting Internal Audit – 1 recommendation remains open and is highlighted both in relation to risk and age. This recommendation was repeated in the more recent HMICS Assurance Review of Vetting. Both recommendations remain open on our recording system as they have been made by 2 different bodies. We have linked the records on our recording system.

Due to the volume of work and increase in vetting applications associated with new officer recruitment, this work has been paused. Interim measures have been put in place to manage the risk and a full assessment of achievability and prioritisation will be made at the next review in March 2025.

By Age

Events – 3 out of the 15 recommendations originally made in 2018 by HMICS remain outstanding. There has been a substantial improvement in this area through addressing the other 12 recommendations but fully addressing the final 3 and evidencing the impact of the improvement is challenging. All three have strong links to using resources more efficiently, risk assessing resourcing decisions and evidencing learning from events around resourcing which remains our priority. The resourcing being referred to is not the resourcing for the event itself but rather the impact on resourcing in local policing areas where abstractions have occurred. This remains a priority and we are moving in the right direction aligned to our Business Plan.
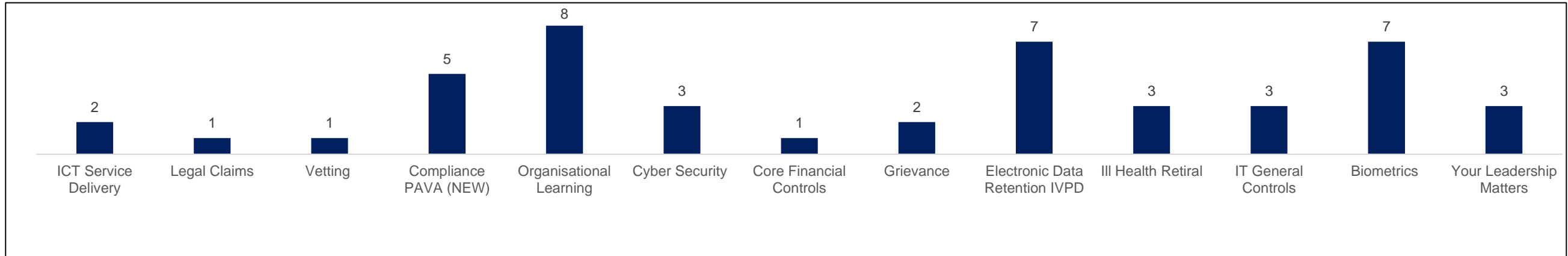
Organisational Learning – 8 recommendations from this Internal Audit published in September 2022 remain open. This area was self-identified by Police Scotland due to there being no framework in place or co-ordinated structure. Since the audit, we have spent time researching, designing and identifying a structure that would best suit requirements. This is at the stage of identifying how this growth area can be resourced. Whilst we are very close to achieving this the recommendations will not be discharged until we can evidence the process working in practice.

Independent Review of Complaints Handling – 4 recommendations remain from the original 26 police only recommendations. 1 recommendation relating to reviewing rank ratios and a wider review of the role of the Sergeant is one of the most complex recommendations being progressed. Others relate to expanding, collating and reporting on EDI data which are coming towards a conclusion.
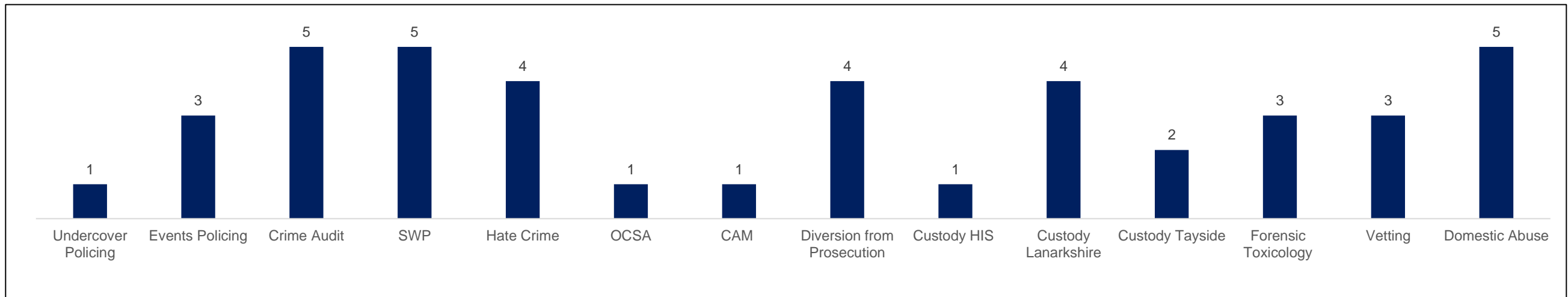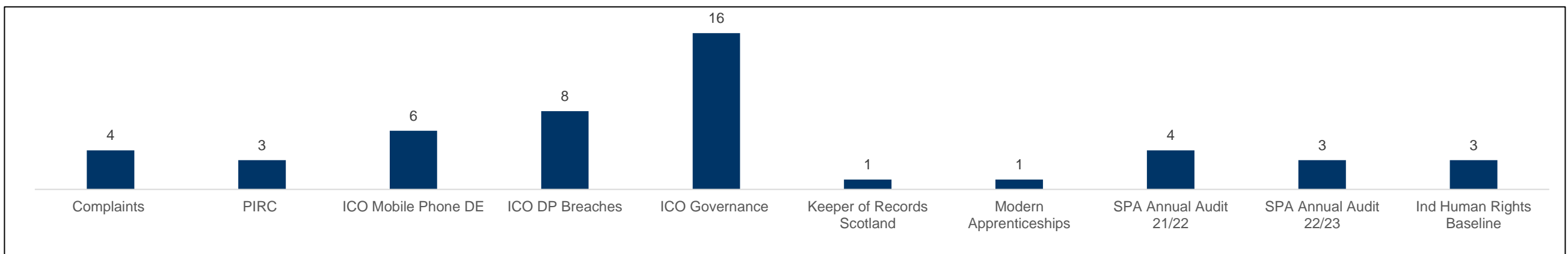
Date Changes – By Audit Body

Internal Audit

Internal Audit bar chart:
- ICT Service Delivery: 2
- Legal Claims: 1
- Vetting: 1
- Compliance PAVA (NEW): 5
- Organisational Learning: 8
- Cyber Security: 3
- Core Financial Controls: 1
- Grievance: 2
- Electronic Data Retention IVPD: 7
- Ill Health Retiral: 3
- IT General Controls: 3
- Biometrics: 7
- Your Leadership Matters: 3

HMICS

HMICS bar chart:
- Undercover Policing: 1
- Events Policing: 3
- Crime Audit: 5
- SWP: 5
- Hate Crime: 4
- OCSA: 1
- CAM: 1
- Diversion from Prosecution: 4
- Custody HIS: 1
- Custody Lanarkshire: 4
- Custody Tayside: 2
- Forensic Toxicology: 3
- Vetting: 3
- Domestic Abuse: 5

Independent Reviews

Independent Reviews bar chart:
- Complaints: 4
- PIRC: 3
- ICO Mobile Phone DE: 6
- ICO DP Breaches: 8
- ICO Governance: 16
- Keeper of Records Scotland: 1
- Modern Apprenticeships: 1
- SPA Annual Audit 21/22: 4
- SPA Annual Audit 22/23: 3
- Ind Human Rights Baseline: 3
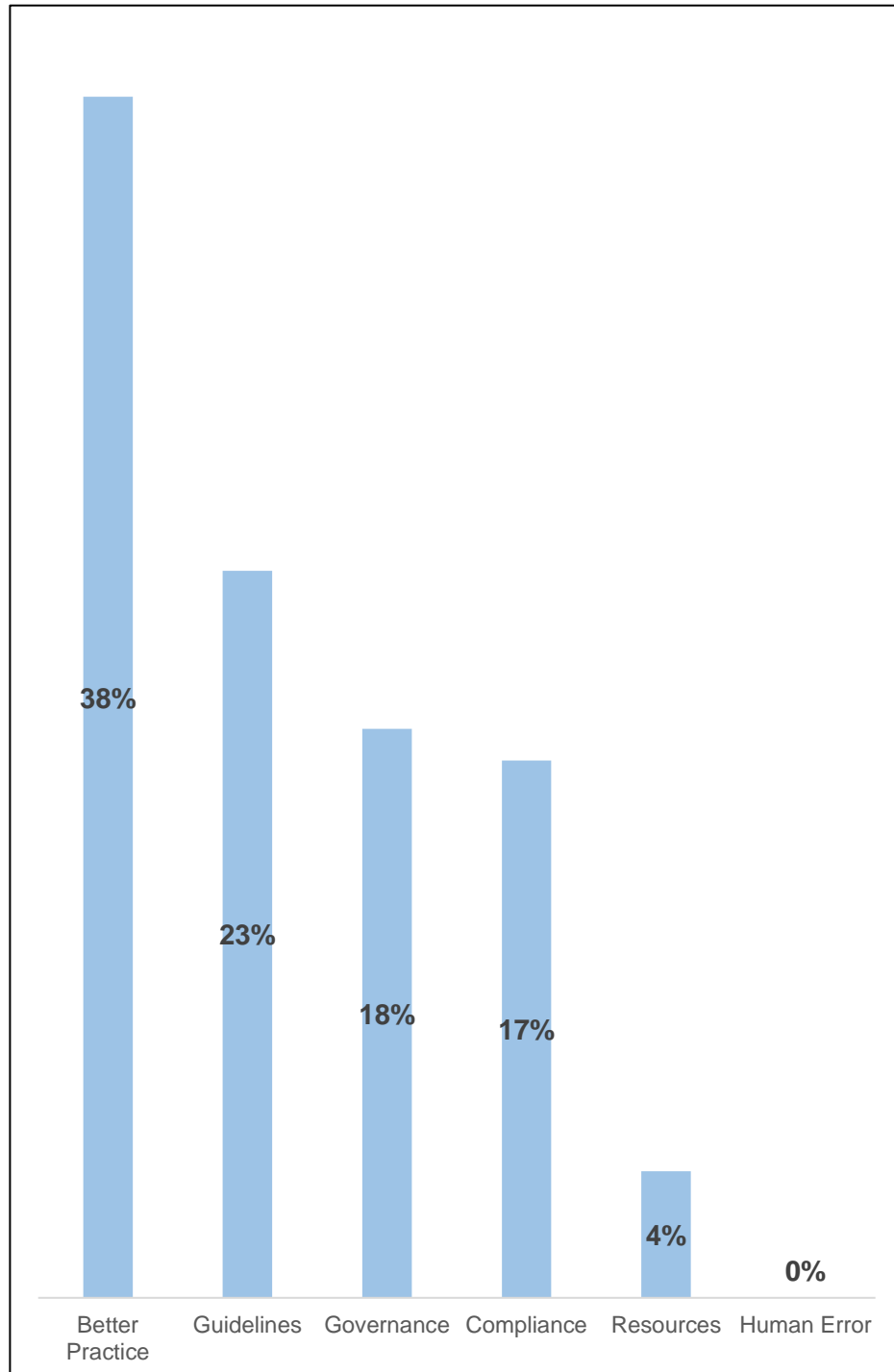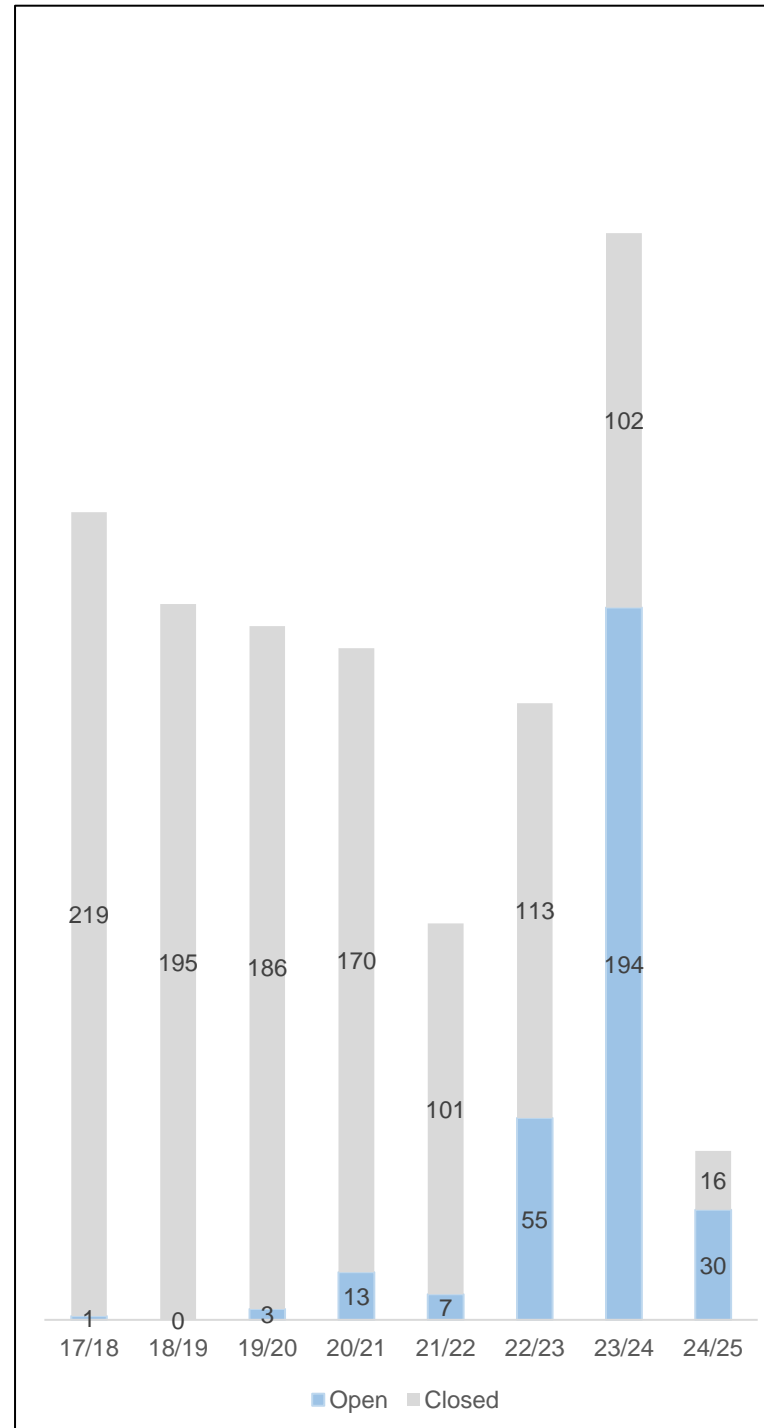
Police Scotland Recommendations Trends

Recommendations by Theme (%)

Recommendations by Age

Summary

- **Themes** – The largest proportion of recommendations relate to Better Practice meaning these are opportunities for continuous improvement rather than relating to non-compliance. There remain high numbers of recommendations in the Guidelines category which relates to policies, procedures to govern what, why and how activities are progressed. In the next quarter we will add Business Plan themes to our HMICS recommendations as a means of showing priority actions.

- **Age** – There has been positive movement with closures in the 23/24 age category. There has been no change to recommendations open 2022 and older. We continue to focus on reducing the number of recommendations in the oldest age category and we are working on bringing these to a close.

Appendix B

Summary of Very High and High Risk
Recommendations

AMT High Level Status for ARAC Reporting

Risk Rating (AMT)	Very High, High

HMICS Recommendations

Publication Title	Publication Date	Summary of Recommendation	Risk Rating	Timing	Status	SPA Governance
Custody D&G (Joint)	07 Nov 2023	R09 Maintenance of Emergency Equipment…	High	Late	In Progress	Policing Performance Committee
Custody D&G (Joint)	07 Nov 2023	R13 Training for Administering Medication…	High	Late	In Progress	Policing Performance Committee
Custody Lanarkshire (Joint HIS)	20 Apr 2023	R7 - Record Patient Transfers…	High	Late	In Progress	Policing Performance Committee
Custody Lanarkshire (Joint HIS)	20 Apr 2023	R8 - Compliance with Environmental Cleaning Standards…	High	Late	In Progress	Policing Performance Committee
Custody Lanarkshire (Joint HIS)	20 Apr 2023	R9 - Availability of Cleaning Products…	High	Late	In Progress	Policing Performance Committee
Custody Lanarkshire (Joint HIS)	20 Apr 2023	R13 - Safe/Lockable Storage for Drugs…	High	Late	In Progress	Policing Performance Committee
Frontline Focus Wellbeing (Strategic)	11 Apr 2024	R01 Wellbeing Plan…	High	On-Track	Not Started	People Committee
Vetting AAR	03 Oct 2023	R02 Review of Recruitment Vetting for All Staff…	High	On-Track	In Progress	Complaints and Conduct Committee
Vetting AAR	03 Oct 2023	R03 Vetting - 10 Year Checks…	High	Behind	In Progress	Complaints and Conduct Committee
Vetting AAR	03 Oct 2023	R04 Policy and Process for Granting Conditional Vetting Clearance…	High	On-Track	In Progress	Complaints and Conduct Committee
Vetting AAR	03 Oct 2023	R05 Designated Post List Review…	High	Late	In Progress	Complaints and Conduct Committee
Vetting AAR	03 Oct 2023	R08 Policy - Reviewing Vetting Following Misconduct…	High	Behind	In Progress	Complaints and Conduct Committee
Vetting AAR	03 Oct 2023	R09 Policy - Enhanced Vetting Checks Refused/Withdraw…	High	Behind	Not Started	Complaints and Conduct Committee
Vetting AAR	03 Oct 2023	R11 Policy for Maintenance of Vetting Clearance…	High	On-Track	In Progress	Complaints and Conduct Committee
Missing Persons (AAR)	03 Oct 2024	R2 Consistent National Leadership…	High	Draft	Draft	Policing Performance Committee
Missing Persons (AAR)	03 Oct 2024	R11 Evaluate Quality of Police Response…	High	Draft	Draft	Policing Performance Committee
Custody Ayrshire (Joint HIS)	30 May 2024	R4 Sharps Bins - Compliance NHS Ayrshire and Arran and Police Scotland should ensure that sharps bins are managed in line with current guidance	High	Draft	Draft	Policing Performance Committee

AMT High Level Status for ARAC Reporting

POLICE SCOTLAND
Keeping people safe
POILEAS ALBA

Risk Rating (AMT)	Very High, High

Independent Review Recommendations

Publication Title	Publication Date	Summary	Risk Rating	Timing	Status	SPA Governance
Records Management 2022 - Keeper of Records Scotland Assessment	09 Aug 2022	Element 3-Policy	High	On-Track	In Progress	Audit Risk and Assurance Committee
Records Management 2022 - Keeper of Records Scotland Assessment	09 Aug 2022	Element 6: Destruction Arrangements	High	On-Track	In Progress	Audit Risk and Assurance Committee
Records Management 2022 - Keeper of Records Scotland Assessment	09 Aug 2022	Element 8: Information Security	High	On-Track	In Progress	Audit Risk and Assurance Committee
Independent Human Rights Assessment	01 Jul 2023	8. OST Training...	High	Draft	Draft	Policing Performance Committee
Independent Human Rights Assessment	01 Jul 2023	19. Use of Force Policy...	High	Draft	Draft	Policing Performance Committee

Internal Audit Recommendations

Publication Title	Publication Date	Summary	Risk Rating	Timing	Status	SPA Governance
Cyber Security	11 Jan 2023	2.2 Policy Weaknesses...	High	Behind	Not Started	Audit Risk and Assurance Committee
Compliance PAVA Airwave	17 Mar 2023	1.2 PAVA - Storage Lockers...	High	On-Track	In Progress	Audit Risk and Assurance Committee
Compliance PAVA Airwave	17 Mar 2023	2.1 PAVA - Oversight Arrangements...	Very High	Behind	In Progress	Audit Risk and Assurance Committee
Compliance PAVA Airwave	17 Mar 2023	3.1 PAVA - Tracking of Stock...	Very High	On-Track	In Progress	Audit Risk and Assurance Committee
Compliance PAVA Airwave	17 Mar 2023	4.1 PAVA Compliance Monitoring...	Very High	Behind	In Progress	Audit Risk and Assurance Committee
Vetting	11 Jul 2022	1.1 Designated Posts...	High	Behind	In Progress	Complaints and Conduct Committee
Investment Prioritisation & Budget Setting	14 Mar 2024	2.1 Impact Analysis Framework...	High	On-Track	In Progress	Audit Risk and Assurance Committee
Grievance Process	30 Apr 2024	1.1 Grievance Governance Reporting...	High	On-Track	Not Started	Audit Risk and Assurance Committee
New Legislation	29 Jan 2024	1.2 Reporting to the Resources Committee (Financial Breakdown Template)...	High	On-Track	Not Started	Audit Risk and Assurance Committee
New Legislation	29 Jan 2024	1.3 Reporting to the Resources Committee (Detailed Figures)...	High	On-Track	Not Started	Audit Risk and Assurance Committee

Further detail can be provided if more detail is required. Internal Audit provide further detail within their reports in respect of high risks and delayed recommendations. HMICS recommendations are reported in more detail at the relevant SPA Committee. Further detail can be found in the papers if required.