

Meeting	SPA Complaints & Conduct Meeting
Date	21 November 2019
Location	Pacific Quay, Glasgow
Title of Paper	Review of Complaints Handling, Investigations and Misconduct Issues in Relation to Policing – Police Scotland Update
Presented By	ACC Alan Speirs, Professionalism and Assurance
Recommendation to Members	For Noting
Appendix Attached	Yes Appendix A Appendix B

PURPOSE

The purpose of this report is to provide SPA Complaints and Conduct Committee with an overview of the Independent Review of Complaint Handling, Interim Report produced by Dame Elish Angeloni and progress towards addressing the recommendations outlined within that report.

Members are requested to note the information contained within this report.

1. BACKGROUND

- 1.1 In June 2018, the then Cabinet Secretary for Justice, and the Lord Advocate invited Rt. Hon. Dame Elish Angiolini DBE QC to conduct an independent review on complaints against the police in Scotland.
- 1.2 The Review commenced in September 2018 with a mandate to examine the effectiveness of the systems and processes for dealing with complaints and to make recommendations that will help to strengthen public confidence in policing in Scotland.
- 1.3 Her Preliminary Report identified a total of 30 Recommendations (attached at Appendix A). 12 of these are specific to Police Scotland. The report reinforces the need for strong partnership working between the Police Investigation and Review Commission (PIRC), Crown Office and Procurator Fiscal Service (COPFS), Scottish Police Authority (SPA), Scottish Government (SG) and Police Scotland highlighting this collaborative work as key to success.
- 1.4 It is anticipated the full report; expected to be published in August 2020; will seek to address practice, policy, procedure, legislation and regulations relative to the entire Complaint Handling Process.
- 1.5 Police Scotland are committed to delivering not only those recommendations but addressing key observations contained within the report.

2. FURTHER DETAIL ON THE REPORT TOPIC

INTERIM REPORT

- 2.1 A consistent theme throughout the report is in and around the culture within Police Scotland. Clarification was sought from Scottish Government (SG) around their interpretation of 'Culture'. They explained that supervisors appeared reluctant to take personal responsibility for the resolution of complaints. Instead complaints were escalated beyond the level where resolution was most appropriate.
- 2.11 In response to the interim report, the SPA, PIRC, COPFS and Police Scotland have formed a Strategic Oversight Group supported by the Scottish Government to address the recommendations contained within the current interim report and forthcoming full

report. Police Scotland is represented by ACC Professionalism and Assurance and meets on a bi-monthly basis. The oversight group is further supported by a working group with representation from the foregoing organisations.

- 2.12 In addition, within Police Scotland, a Complaint Handling Review Working Group (CHRWG) has been established to address those recommendations specific to Police Scotland. This group is overseen by the Head of Professional Standards, reporting to ACC Professionalism & Assurance.
- 2.13 The CHRWH commissioned the internal Risk, Assurance & Inspection function to compile a comprehensive action plan which incorporates all 30 Recommendations, timescales, ownership and a defensible audit trail of activity being undertaken. This action plan will be managed and updated on a regular basis to reflect the current position of all Police Scotland recommendations.
- 2.14 The CHRWG have an agreed terms of reference, remit, structure, frequency of [fortnightly] meetings and a process for tackling the recommendations. The CHRWG will progress, deliver and discharge the recommendations working closely with partners to proactively identify and address areas for improvement and future development.
- 2.15 The recommendations have been categorised into key themes:
- People and Organisational Learning and
 - Technology.
- 2.16 Whilst not a key theme, partnerships is recognised as an integral part of successful delivery.

PEOPLE AND ORGANISATIONAL LEARNING

- 2.2 This includes all aspects of training, line manager capability and responsibility and wider staff awareness of force procedures available to them.
- 2.21 Central to this will include the development of preventative and awareness raising strategies by the newly established Policing Values and Professional Ethics Unit, to proactively protect, educate and support our people.

- 2.22 This includes audit of complaint handling and conduct processes, providing the opportunity for continuous improvement and embedding individual/organisational learning whilst refining processes.
- 2.23 Police Scotland require to consider specific aspects of training for all stages of complaint handling. PSD is committed to promoting a culture of organisational learning, actively identifying opportunities to influence individual, group and wider organisational learning by cascading good practice and communicating areas for development/learning in collaboration with partner agencies.
- 2.24 A short life working group dedicated to training has been established in order to progress as a priority and involve key business areas including People and Development.
- 2.25 The scope for training will go wider than the Dame Elish report and will include training for all officers who have responsibility at any stage of the complaint process.

TECHNOLOGY

- 2.3 Acceleration of plans around delivery to the force of body worn video technology. Facilitate the provision of access to PSD systems/databases to partners.

PARTNERSHIPS

- 2.4 Collaboration with key partners (PIRC, SPA, SG, COPFS) to consider wider legislative provisions and promote a culture of engagement and cooperation.

AREAS FOR FURTHER DEVELOPMENT

- 2.5 The report provides Police Scotland with a baseline to focus and deliver upon specific recommendations, however it will also be used as a springboard to prioritise and maximise the effective delivery of PSD going forward essentially maintaining, promoting and improving professional and ethical standards across all aspects of complaint handling.
- 2.51 Continued financial constraints and future resource intensive Operations including EU Exit and Operation Urram will continue to place additional demands on the complaints handling process.

It is therefore important that work continues in consultation with relevant business areas and partners to ensure that complaint handling is sustainable and ultimately remains fit for purpose. Full action plan is attached at Appendix B.

PSD STRUCTURE

2.6 One consideration will be efficiencies and effectiveness of the current three tier complaint handling structure, including:

- Notification of complaint and frontline resolution (NCARU and Divisional)
- Divisional Investigation and Resolution
- PSD Investigation and Resolution

2.61 In consideration of the additional demands placed upon Divisions and in an effort to ensure National consistency in complaint handling the CHRWG will explore the potential options for PSD to take ownership of 1 or all of the following:

- Complaints, misconduct matters (not gross), gross misconduct (discipline) policestaff.

2.62 Engagement will continue with internal Risk, Audit and Assurance functions to support and manage the ongoing work generated from the Complaint Handling Review.

2.63 As mentioned previously, a new training programme spanning all stages of complaint handling for a range of officers and staff will be progressed.

2.64 A communication and engagement plan will ensure all police officers and members of staff are informed about any improvements/changes being made and what is expected of them. This will extend to incorporate relevant partners.

GOVERNANCE

2.7 The complaint handling work is governed on a multi-agency basis by The Strategic Complaint Handling Oversight Group and reporting mechanisms are in place. This group has Executive representation from Police Scotland, COPFS, SPA and SG who work together to ensure consistent practice in relation to

complaints handling and investigations across the policing / justice sector, increase public confidence and satisfaction with service across all relevant bodies and provide strategic governance around cross organisational recommendations contained in the report.

2.71 Both the Strategic Oversight Group and the tactical Complaint Handling Working Group meet regularly with the Scottish Government Complaint Handling Review Group Secretariat to scope recommendations, seek points of clarification, consult on proposed legislative changes and preparation for final report.

2.72 A National Complaint Handling Development Group with representation at practitioner level from PIRC, SPA and Police has been established to support partnership engagement and contribute towards the successful delivery of the recommendations and beyond.

PERFORMANCE

2.8 It is assessed that the recommendations detailed in the Dame Elish interim report, once implemented will provide Police Scotland with a more comprehensive, consistent and streamlined process across all aspects of complaint handling. This will be more efficient and effective in maintaining a quality of service and meeting strategic priorities.

Timing

2.81 It is essential that the recommendations in the interim report are progressed, delivered and discharged timeously in advance of the full report anticipated in August 2020.

CONCLUSION

2.9 Managing public satisfaction is paramount and Police Scotland will demonstrate our commitment to efficiently and effectively managing, investigating and resolving complaints whilst fully contributing to the learning, development and education of our staff.

- 2.91 The interim report and other work being undertaken provides an excellent opportunity for Police Scotland to work in collaboration with PIRC, SPA, COPFS and SG to deliver a transparent, accountable and proportionate complaint handling process.

3. FINANCIAL IMPLICATIONS

- 3.1 The financial impact of providing body worn cameras to officers is a matter currently being progressed through a submission to force executive for consideration.

An options paper will be submitted in relation to provision of mediation training for complaint handlers to ascertain the most relevant and cost effective option whilst maintaining a quality of service to the public.

4. PERSONNEL IMPLICATIONS

- 4.1 There will be no personnel implications as the staff associated with the described work will complete this as part of their PSD business as usual.

5. LEGAL IMPLICATIONS

- 5.1 In an officer's pursuance of their general duties; Section 20, Police & Fire Reform (Scotland) Act 2012; it is accepted that on occasions things may go wrong and mistakes will be made. The PSD is committed to maintaining public confidence in our response to complaints made about the police and to promoting a culture of organisational learning. This commitment by PSD is underpinned by Section 32(a) of this same Act which states Police Scotland's main purpose is '*to improve the safety and wellbeing of people, places and communities in Scotland.*' Working together with our partners: PIRC, SPA and CAAPD; in responding to this Review also fulfils the policing principles set out in Section 32(b) the Act in as much as it accords with the main purpose of policing.

6. REPUTATIONAL IMPLICATIONS

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- 6.1 If Police Scotland does not address the recommendations our ability to improve and enhance complaint handling will be affected and could have a detrimental impact on public confidence in policing in Scotland.

7. SOCIAL IMPLICATIONS

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

8. COMMUNITY IMPACT

- 8.1 There are no known community impact associated with this paper.

9. EQUALITIES IMPLICATIONS

- 9.1 Upon progression of relevant recommendations, a fuller review and assessment of any impact, including the completion of an Equality and Human Rights Impact Assessment (EqHRIA) where necessary.

10. ENVIRONMENT IMPLICATIONS

- 10.1 There are no known environmental implications associated with this paper.

RECOMMENDATIONS

Members are requested to:

This paper is submitted to SPA Complaints and Conduct Committee for noting the current activity ongoing to effectively progress and discharge the recommendations as published in Dame Elish Complaint Handling Review.

Independent Review of Complaints Handling - OVERVIEW 30 RECOMMENDATIONS - Interim Report, June 2019

U R N	Summary Title	Recommendation	Risk / Outcome / Background	Action Owner
1	Excessive force allegations	Recommendation 1 Given the importance and sensitivity of such allegations it is recommended that all such allegations of excessive force should continue to be reported immediately by PSD to CAAP-D for instruction and investigation by the independent Procurator Fiscal or by PIRC on the directions of the Procurator Fiscal of CAAP-D.	<ul style="list-style-type: none"> • CAAP-D conduct a retrospective review of a representative sample of complaint cases characterised by Police Scotland as 'excessive force' and/or 'unlawful detention'. • Police Scotland expected to report all cases to CAAP-D where they categorise the complaint as one of 'excessive force'. 	CI Briony Daye
2	Capability of Line Management - Training and Support	Recommendation 2 Police Scotland should review the service-wide capability of its line managers to line manage effectively, including the adequacy of training and mechanisms of support for line managers.	<ul style="list-style-type: none"> • A need to re-empower first and second line managers. • Consider an approach based on learning and improvement rather than punishment. • Better use of Performance Regulations and less reliance on Conduct Regulations. 	CI Briony Daye
3	Skilled complaints handling staff	Recommendation 3 Police Scotland should consider the scope for employing more non-police officer support staff in PSD with appropriate seniority, skills and level of knowledge of complaints handling. This is an option that Police Scotland may wish to ask HMICS to review.	<ul style="list-style-type: none"> • Consider employing more non-police officers within PSD with appropriate skills and level of knowledge of complaints handling. • Consider requesting HMICS to review this matter. 	PI Deborah Barton
4	Grievance matters	Recommendation 4 Police Scotland should scrutinise complaints thoroughly on receipt so as to ensure that grievance matters that would in any other walk of life be treated in an HR context are not artificially elevated and dealt with as conduct matters.	<ul style="list-style-type: none"> • Flexibility and careful consideration to be taken when accessing complaints at the initial stages. 	CI Briony Daye
5	Frontline resolution of complaints	Recommendation 5 Frontline resolution of complaints should be subject to close and regular monitoring through regular, meaningful internal and external audits, and monitoring of decision-making.	<ul style="list-style-type: none"> • SPA and PIRC conducting a regular audit of the FLR process. • Consider allowing PIRC remote access to Centurion for the purpose of monitoring decision making and ensuring appropriate action is being taken. • Support the SPA in their business case for access to Centurion. 	Angela Wood, Audit and Assurance

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U R N	Summary Title	Recommendation	Risk / Outcome / Background	Action Owner
6	Early intervention	Recommendation 6 Police Scotland should adjust its practice in respect of "Early intervention". Officers should be made aware that they are the subject of a complaint against them at the earliest practicable point, provided that such early disclosure would not prejudice any investigation of a complaint.	<ul style="list-style-type: none"> Consider applying "Early Intervention" where appropriate at an initial stages of the conduct process. Where possible inform officers who are subject to a complaint aware at the earliest opportunity to allow any issues or behaviours to be addressed. 	CI Briony Daye
7	Access to Centurion system	Recommendation 7 PIRC should be given appropriate access to the Police Scotland Centurion system for the purposes of contemporaneous audit of complaints and to help facilitate early PIRC awareness of criminal allegations.	<ul style="list-style-type: none"> It is proposed that PIRC are given access to Centurion for monitoring purposes. It is recommended regular meetings are held between Police Scotland and PIRC to ensure consistency. 	Superintendent Conway
8	Simplifying online complaints form	Recommendation 8 Police Scotland should simplify and streamline systems to make it as straightforward as possible for members of the public to navigate this rather opaque landscape and as easy as possible for them to access and understand information on how to make a complaint. In particular the online complaints form on the Police Scotland website should be made more prominent.	<ul style="list-style-type: none"> Improve Police Scotland website in order to make it more user friendly. Ensure the complaints form is prominent and easy for the user to access. It is recommended that changes are communicated to the public to increase awareness. 	PI Jamie Harrison
9	Raise awareness of procedures	Recommendation 9 To encourage appropriate use of mediation and grievance procedures Police Scotland should raise awareness and understanding amongst all members of the service of their own internal systems and which matters belong where in order to ensure a proportionate response.	<ul style="list-style-type: none"> Improve police and support staff understanding of their own internal complaints system. Encourage discussion, mediation and management intervention as a resolution to minor complaints. Flexibility and careful consideration to be taken when accessing complaints at the initial stages. 	CI Briony Daye
10	Training in mediation and customer handling	Recommendation 10 Police Scotland should consider the importance of providing all officers involved in frontline resolution with training in mediation and customer handling.	Training options being explored for training materials, provider and associated costs. Findings will be presented to PSD CS for information and consideration of progression.	PI Deborah Barton

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U R N	Summary Title	Recommendation	Risk / Outcome / Background	Action Owner
11	Video technology	Recommendation 11 Police Scotland should accelerate its plans to expand the use of body-worn video technology.	BP compiled by Supt Stevie Dolan and submitted to the Force Executive on 31 August 2019 for consideration.	Superintendent Stevie Dolan
12	Addressing long-standing issues - Culture	Recommendation 12 Police Scotland is a young but now established national organisation with a stable leadership team. This is a good opportunity to reflect on the culture of the new service, address any long-standing issues and consider how everyone in the organisation can help to change that culture for the better.	<ul style="list-style-type: none"> • Encourage a learning culture rather than a blame culture. • Ensure systems and the way in which they are operated reflect a learning culture. 	CI Briony Daye / CI Heather Boyle
13	Vexatious complainers	Recommendation 13 The Scottish Government should consider the case for amending the legislation to include a provision to deal with vexatious complainers.	<ul style="list-style-type: none"> • Vexatious Complainers Policies should be consistent and there should be the ability to share the details of vexatious complainers within the organisation. 	Scottish Government
14	Assumption of co-operation	Recommendation 14 Subject to the fundamental right to silence or privilege against self-incrimination of a suspect under Article 6 of Convention Rights, police officers should give every assistance after a serious incident. That assumption of co-operation should be put beyond doubt in the primary legislation, including in the wording of the constable's declaration.	<ul style="list-style-type: none"> • During PIP prioritise the separation of officers in order to preserve evidence. 	Scottish Government

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U R N	Summary Title	Recommendation	Risk / Outcome / Background	Action Owner
15	Additional powers for investigators	Recommendation 15 Where a serious incident is being investigated by the PIRC , the investigators should also have a power, where it is necessary and proportionate, to compel police officers to attend within a reasonable timescale for interview.	<ul style="list-style-type: none"> PIRC should have the power to compel police officers where appropriate to provide interviews during the course of an investigation. 	Scottish Government
16	Prioritising complaints	Recommendation 16 Complaints against senior officers should be prioritised and dealt with, by both the PIRC and the SPA, as speedily as is reasonable, because of the destabilising impact a prolonged investigation can have.		PIRC / PIRC
17	Further training in complaint handling	Recommendation 17 Further training for complaints and conduct officers in SPA should be consolidated and broadened in order to ensure the right skillset and up-to-date knowledge of complaint handling best practice in other sectors.		SPA
18	Alternatives to suspension	Recommendation 18 The range of options available to the SPA when a senior police officer is under investigation under the conduct regulations should be clarified and expanded, to provide alternatives to suspension.	<ul style="list-style-type: none"> Clarification and expansion of options available to SPA when investigating senior officers. Options available should be assessed and tailored to the investigation of a senior officer. 	Scottish Government
19	Amendment of conduct regulations	Recommendation 19 Any process for preliminary assessment of senior officer misconduct should require the relevant authority both to take into account whether the allegation is made anonymously, is specific in time and location, or whether it appears, on the face of the allegation, to be either vexatious or malicious. Scottish Government should consider amending the conduct regulations to reflect this process.		Scottish Government
20	Creating a regional presence	Recommendation 20 The PIRC should consider the case for creating some measure of regional presence to enhance its capacity to respond immediately to the most serious incidents wherever they occur.		PIRC

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U R N	Summary Title	Recommendation	Risk / Outcome / Background	Action Owner
21	New statutory board	Recommendation 21 The PIRC should have the support of a new statutory Board of members appointed through the Scottish public appointments process whose role would be to scrutinise the work of the organisation, review the performance of the Commissioner and offer supportive advice and expertise.	<ul style="list-style-type: none"> • The accountability and support arrangements for PIRC should be clarified and strengthened. • Increase PIRC accountability. 	Scottish Government / PIRC
22	Statutory power for reconsidering complaints	Recommendation 22 The Commissioner, or potentially a Deputy Commissioner, should be vested with a statutory power to make recommendations in addition to the existing powers to direct reconsideration of complaints. The corollary to that is that there should be a statutory duty, subject to a public interest test, on the Chief Constable to comply with recommendations unless there are sound overriding operational or practical reasons for not complying with a PIRC recommendation and an obligation on PSD to report progress back to the PIRC. Those statutory arrangements should be supported by agreement between the PIRC and Police Scotland on how the PIRC will be kept advised of progress.	<ul style="list-style-type: none"> • Amend and clarify Section 35(3) of the 2006 Act with actions proposed in the review report. 	Scottish Government
23	Legal support and advice capacity	Recommendation 23 The PIRC should consider the case for building into its structure legal support and advice capacity.		PIRC
24	recruiting non police officers	Recommendation 24 Following the retirement of former police officers PIRC policy should be to replace them with non-police officers. The PIRC should also adopt a similar policy to the IOPC's in England and Wales by recruiting non-police officers when recruiting to the most senior posts		PIRC
25	management review	Recommendation 25 There should be a management review by an independent expert to ensure that the PIRC has appropriate leadership, skills and culture to carry out its functions in the future, and to examine interactions with other stakeholders and how they can be improved.		PIRC

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U R N	Summary Title	Recommendation	Risk / Outcome / Background	Action Owner
26	Senior cross-agency joint working group	Recommendation 26 There should be the immediate establishment of a senior cross-agency joint Working Group involving the SPA, Police Scotland and the PIRC to develop appropriate and up-to-date guidance.	<ul style="list-style-type: none"> Review the language used in correspondence to complainers, make this simpler and clearer. Review the guidance on categorisation of complaints, particularly incivility, excessive force and unlawful detention. Consider a multi-agency MOU between PS, SPA, PIRC and COPFS to improve communication and ability to share information. 	ALL
27	Prioritise and co-ordinate audit arrangements	Recommendation 27 All the audit arrangements, including regular dip-sampling, designed to identify poor practice, good practice and emerging trends should be prioritised and co-ordinated to support the common objective of improving standards and service to the public.	<ul style="list-style-type: none"> PIRC should prioritise the audit of complaints and identification of trends. Highlighting the importance of internal audit within SPA/PS. 	PIRC / SPA / PSoS
28	Barred and Advisory lists	Recommendation 28 The Scottish Government should introduce Barred and Advisory lists and should engage with the UK Government to ensure compatibility and learn from their experience.		Scottish Government
29	Amend relevant provisions	Recommendation 29 The Scottish Government should amend the relevant provisions at the earliest opportunity to put beyond doubt the definition of a “person serving with the police”.	<ul style="list-style-type: none"> Remove ambiguity in legislation surrounding the investigation of retired police officers. 	Scottish Government
30	Amending legislation	Recommendation 30 The Scottish Government should consider the case for amending the legislation to put beyond doubt the definition of a member of the public who may make a relevant complaint.		Scottish Government

Independent Review of Complaints Handling - OVERVIEW 30 RECOMMENDATIONS - Interim Report, June 2019

U R N	Summary Title	Recommendation	Risk / Outcome / Background	Action Owner

RECOMMENDATION STATUS

URN	Summary	Action To Be Taken	Updates	Lead	Timescales	Professionalism and Corporate Management Board (Updates)	Status	
B	1	Excessive force allegations	Seek confirmation from CAAP-D about what they want to receive from Police Scotland with regards excessive force allegations.	September 2019 - Situational Update Meeting scheduled for 26.10.19 with CAAP-D to clarify and agree position thereafter advise SG accordingly. Thereafter communication clarifying process will be circulated across partner agencies.	CI Briony Daye	31.10.19	26.09.19	Ongoing
				October 2019 - Situational Update Awaiting Mr Les Brown's (CAAP-D) confirmation (or otherwise) of position he had previously agreed with Police Scotland in a final Police Scotland/CAAP-D excessive force referral agreement letter he issued on 13.11.18. Once confirmed, communication clarifying process will be circulated across partner agencies.			Ongoing	
				November 2019 - Situational Update Contrary to the instruction contained in the referral agreement letter, Mr Brown confirmed he expects CAAP-D to receive all excessive force allegations. Police Scotland continues to operate as per the referral agreement. A meeting between Mr Brown, PSD and the Scottish Government's Review Team is scheduled for 03.12.19 to discuss the Review Team's understanding of the referral process/requirements and agree a process going forward.			Ongoing	
B	2	Capability of Line Management - Training and Support	Scoping exercise to determine existing PSD training: includes training packages, frequency and location of inputs, experience of staff delivery and identification of gaps in service provision.	September 2019 - Situational Update Training Short Life Working Group (SLWG) established to lead on scoping exercise. SLWG is due to meet week beginning 7 October 2019.	PI Deborah Barton	31.03.20	26.09.19	Ongoing
				October 2019 - Situational Update Scoping exercise is underway. Preparatory meeting for the Training SLWG will take place on 24.10.19 with first full members meeting on 05.11.19.			Ongoing	
				November 2019 - Situational Update The first meeting of the Training SLWG took place on 05.11.19. New training inputs for Probationers, Continuous Professional Development (CPD) events for local policing Sergeants and Inspectors, Complaint Handling and Mediation training for NCARU staff and making better use of the online 'How To' platform were discussed and will be progressed.			Ongoing	
B	3	Skilled complaints handling staff	Scope employment of non-police staff in PSD. Consider request to HMIC(S).	September 2019 - Situational Update Correspondence being compiled and will be forwarded to Quad Group for consideration of submission to HMIC(S).	PI Deborah Barton	31.10.19	26.09.19	Ongoing
				October 2019 - Situational Update This action will not be taken to the Quad Group at this time. ACC Speirs asks the CHRWG focus on the other recommendations going forward.			On Hold	
				November 2019 - Situational Update As per October 2019 update - position remains unchanged.			On Hold	
B	4	Grievance matters	Prepare a brief comparative analysis with like English forces. Paper is for the information of ACC Speirs (and Review Team) and should include reference to numbers of officers, complaints etc.	September 2019 - Situational Update Work has commenced.	CI Colin Robson	30.11.19	26.09.19	Ongoing
				October 2019 - Situational Update Initial approach has been made to a number of English Forces. Work is ongoing to establish a suitable benchmark in order to ensure consistency when conducting a comparison.			Ongoing	

				<p>November 2019 - Situational Update Visit will be made to the Metropolitan Police's Directorate of Professional Standards on 14.11.19. Ahead of visit, the PSD analyst will assist in establishing a suitable statistical benchmark. Avon and Somerset Police have also expressed willingness to assist in a comparison.</p>				Ongoing
B	5	Frontline resolution of complaints	Audit of frontline resolution of complaints with regular internal/external audit of FLR process.	<p>September 2019 - Situational Update Universal audit being carried out by Audit & Assurance with report and recommendations to follow. FLR process under review and BP out for consultation.</p>	Angela Wood Audit and Assurance	31.12.19	26.09.19	Ongoing
				<p>October 2019 - Situational Update Universal audit being carried out by Audit & Assurance with report and recommendations to follow. FLR process under review and BP out for consultation. Proposed that amended FLR process be piloted by NCARU East.</p>			Ongoing	
				<p>November 2019 - Situational Update Universal audit complete. Results will be shared at meeting on 11.11.19. FLR review complete and guidance is being amended. 6 stage form has been updated to reflect changes in FLR process. FLR process is currently being piloted by NCARU East.</p>			Ongoing	
B	6	Early intervention	Early notification when officers are subject to a complaint and adopt a consistency of practice.	<p>September 2019 - Situational Update PSD is reviewing current processes for officer notification with a view to introducing a streamlined consistent practice, communicated to all staff.</p>	CI Briony Daye	30.11.19	26.09.19	Ongoing
				<p>October 2019 - Situational Update PSD is reviewing current processes for officer notification with a view to introducing a streamlined consistent practice, communicated to all staff. Work remains ongoing.</p>			Ongoing	
				<p>November 2019 - Situational Update Ongoing engagement with PIRC to establish notification date based on case assessment time scales. National Consistency will be rolled-out thereafter.</p>			Ongoing	
B	7	Access to Centurion system	Provide PIRC appropriate access to Centurion.	<p>September 2019 - Situational Update Discussions ongoing with Information Management regarding security implications and managing expectations.</p>	Supt Norrie Conway	31.12.19	26.09.19	Ongoing
				<p>October 2019 - Situational Update Information Management concerned PIRC access to [the whole of] Centurion would be disproportionate to their requirements and in breach of the Data Protection Act 2018. Ongoing engagement with PIRC to determine their specific [Centurion] information requirements.</p>			Ongoing	
				<p>November 2019 - Situational Update Ongoing engagement with PIRC to obtain comprehensive understanding of what they require access to, the purpose of the access and further details on their information management processes.</p>			Ongoing	
	8	Simplifying online complaints form	Simplify access to both the online complaints form and the accompanying information on how to make a complaint for members of the public.	<p>September 2019 - Situational Update Changes made to internet and simplified for easier reporting.</p>	PI Jamie Harrison	N/A	26.09.19	Complete
	9	Raise awareness of procedures	Improve police and support staff understanding of their own internal complaints system.	<p>November 2019 - Situational Update It has been agreed at CHRWG that this recommendation is a vein running through most other Police Scotland recommendations. It will be considered and duly incorporated in any new process, practice, procedure and training developed by the CHRWG.</p>				Ongoing
				<p>September 2019 - Situational Update Training options are currently being explored for training materials, provider and associated costs. Findings will be presented to PSD CS for information and consideration of progression.</p>			26.09.19	Ongoing

B	10	Training in mediation and customer handling	Training in mediation and customer handling for NCARU officers.	October 2019 - Situational Update Scoping exercise is complete. Options paper is being prepared for the information and consideration of the PSD CS.	PI Deborah Barton	31.12.19				Ongoing
				November 2019 - Situational Update Options paper is complete and has been submitted to the PSD CS for his information and consideration.						Ongoing
	11	Video technology	Accelerate plans to expand use of body worn cameras.	September 2019 - Situational Update BP compiled by Supt Stevie Dolan and submitted to the Force Executive on 31 August 2019 for consideration.	Supt Stevie Dolan	TBC	26.09.19			Complete (Meantime)
B	12	Addressing long-standing issues - Culture	Examine all Policing Values and Professional Ethics work streams to determine any short, medium and long term attainable goals that could be 'linked' to the recommendations within the Independent Review.	September 2019 - Situational Update Communications strategy focusing on Positive Professionalism is being developed with a planned release date across the Force week commencing 30.09.19. Discussions at the CHRWG meeting on 01.10.19 will focus on short, medium and long term delivery of the Preventions strategy.	CI Briony Daye CI Heather Boyle	31.12.19	26.09.19			Ongoing
				October 2019 - Situational Update Discussions at the CHRWG meeting on 15.10.19 will focus on short, medium and long term delivery of the Preventions strategy.						Ongoing
				November 2019 - Situational Update This subject will be discussed as a standing agenda item for forthcoming CHRWG meetings. meantime, meeting to identify priorities and develop a suitable delivery plan will take place over the coming days.						Ongoing
B	27	Prioritise and co-ordinate audit arrangements	Audit Universe of PSD being carried out by Assurance Manager to assist in the introduction of a robust audit process.	September 2019 - Situational Update A series of interviews between assurance team and PSD staff is complete and final walk through is due to take place 25.09.19 to inform final recommendations.	Angela Wood Audit and Assurance	30 November 2019	26.09.19			Ongoing
				October 2019 - Situational Update Ms Wood confirms work is expected to be complete by the end of November 2019.						Ongoing
				November 2019 - Situational Update Universal audit complete. Results will be shared at meeting on 11.11.19.						Ongoing
B	Learning and Development	National Consistency	Taking account of additional demands placed upon Divisions a review around National consistency will take place.	September 2019 - Situational Update A paper will be compiled and submitted for consideration to CS. Included in the paper will be potential options for PSD to take ownership of 1 or all of the following: Complaints, misconduct matters (not gross), gross misconduct (discipline) police staff.	CI Briony Daye	30 November 2019	26.09.19			Ongoing
				October 2019 - Situational Update A paper will be compiled and submitted for consideration to CS. Included in the paper will be potential options for PSD to take ownership of 1 or all of the following: Complaints, misconduct matters (not gross), gross misconduct (discipline) police staff. Work remains ongoing.						Ongoing
				November 2019 - Situational Update Work has commenced on examining potential options for PSD to take ownership of 1 or all of the following: Complaints, misconduct matters (not gross), gross misconduct (discipline) police staff.						Ongoing