SCOTTISH POLICE AUTHORITY

	Agenda Item 4c

Meeting	Audit, Risk and Assurance Committee
Date and Time	16 July 2020
Location	Video Conference
Title of Paper	Police Scotland Audit and Improvement Recommendations Tracker – Q1 Update
Presented By	ACC Alan Speirs, Professionalism and Assurance
Recommendation to Members	**For Discussion**
Appendix Attached:	YES Appendix A – Recommendations Tracker Appendix B – New HMICS Recommendations (Action Plan)

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 content of this paper.

1.   BACKGROUND

The Audit and Improvement Tracker provides a methodology for recording, managing and updating all recommendations from external bodies.

The Tracker is provided at **Appendix A.** This provides a breakdown of all publications, risk and progress.

All recommendations are assessed in terms of the risk it presents 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 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 organisanisation
🟩	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

The following provides a summary of progress:

Closures
- **65 recommendations are proposed for closure**. Of those closed, 20 were High Risk, 23 Medium Risk and 22 Low Risk.

The following provides a brief summary of some achievements in the last quarter.

Custody
Greater Glasgow Inspection
- All ancillary centres now have a site specific risk assessment and fire evacuation plan in place. There are currently ongoing Joint Health and Safety inspections being carried out for all primary centres, which are timetabled and scheduled to be completed by end of December 2020. Once primary centres have been completed, ancillary centre visits will be arranged for 2021.

Custody Inspection 2014
- We have reviewed the single cell policy which now states that only one detainee will be placed in a cell and that multiple occupancy of a cell should only be considered when all other options have been exhausted.

- We have set out an Estate Strategy for custody.

- **Firearms Licensing**
  National standards have been rolled out including a new training programme. This provides an opportunity not only to refresh skills and knowledge, but to share information about the latest developments in firearms licensing and any learning arising from audits, complaints, investigations etc.

  Procedures have been updated in respect of the storage and transfer of firearms to ensure consistency across Scotland.

- **Financial Planning**
  A new benefits realisation framework has been approved and is now in use with all Benefits Realisation Plan following this framework. This ensures all identified benefits are sufficiently detailed, accurate and up to date to support financial planning.

- **Information Management – Data Security Management**
  We have provided additional details about security incidents and published this information within the FAQs section on the Intranet to ensure up to date information is

available on what constitutes a security incident. This contributes to improved reporting.

- **Efinancials Internal Audit**
  We have reviewed and updated all roles and responsibilities for using the Asset 4000 and eFinancials Systems. This ensures no single point of failure due to the over reliance of key individuals. A user access control matrix has been adopted to document and control permissions to protect segregation of duties. We have revised our auditing regime to provide assurance over appropriate use of the systems.

  There is a clear process in place to ensure that access to systems is only granted following receipt of a signed SyOps form confirming that users are aware of their roles and responsibilities. The SyOps form has also been revised for both eFinancials and Asset 4000 to reflect current practice and ensures that staff are not accessing systems without the necessary training.

- **Strategic Workforce Planning**
  We have made further progress with developing the project plan following PRINCE2 methodology.

- **Productions**
  The project plan for the productions project has been updated to record funding withdrawal and slippage. This has improved the financial and benefit assessments of progress with the project.

- **Complaints Handling Independent Review and Internal Assurance Review of Complaints Handling**
  We have reviewed the composition of staff dealing with complaints, developed and communicated consistent procedures, learning and ownership across Police Scotland and simplified the forms used.

Open Recommendations

There are 152 recommendations open on the tracker comprising Internal Audit, HMICS, External Auditors and Regulators along with Internal Assurance Reviews.

Open Recommendations by High Risk

- 29 have a High Risk rating. This represents 20% of all open recommendations.

- At this review, **5 High Risk recommendations** have been missed which has not changed from the last quarter. Further details are documented more fully at Table 1.

Table 1 - Very High and High Risk Recommendations that have missed their original date of completion

Date Published	Report Title + Recommendation	Update + Reason for Missing	Owner	Due
June 2017	**IT Service Delivery Internal Audit** *BCM/Disaster Recovery General* **Risk** **Due to the high volume of changes over critical systems, there is a risk that, if ICT recovery plans are not updated in light of changes to be made to the technology environment, they may not be capable of supporting the response to a business interruption. This could result in unforeseen delays in restoring the recovery of ICT services to users. This could also result in negative publicity if there was an impact on public services.**	The planned recovery test for SCOPE did not go ahead as planned on 20 April 2020. Further slippage projected until such time as the COVID-19 situation lessens, given the need to have constant access to HR / Duty Management systems, and the risk of causing interruption to service. **New date set for August.**	CDIO	~~20.04.2020~~ August 2020
March 2019	**IT Application Review SCOPE Internal Audit** BCM/Disaster Recovery General	Further slippage projected until such time as the COVID-19 situation is resolved, given the need to have constant access to HR / Duty Management systems, and the risk of causing interruption to service. **New date set for August.**	CDIO	~~March 2020~~ August 2020
April 2020	**Strategic Workforce Planning** **~ New ~** Communications Plan	The Communication Plan is in draft but has not been finalised due to availability of resource to finalise.	DoPD	~~June 2020~~ End of July 2020
August 2019	**Stock Management x 2** **~New~**	At an advanced stage but not ready for full discharge.	CFO	August 2020

Date Published	Report Title + Recommendation	Update + Reason for Missing	Owner	Due
	KPIs **Authority Structure**			

Graph 1 – Risk Breakdown

The following graph shows the breakdown of open recommendations according to risk. The percentage of Very High and High Risk recommendations is currently 20%.
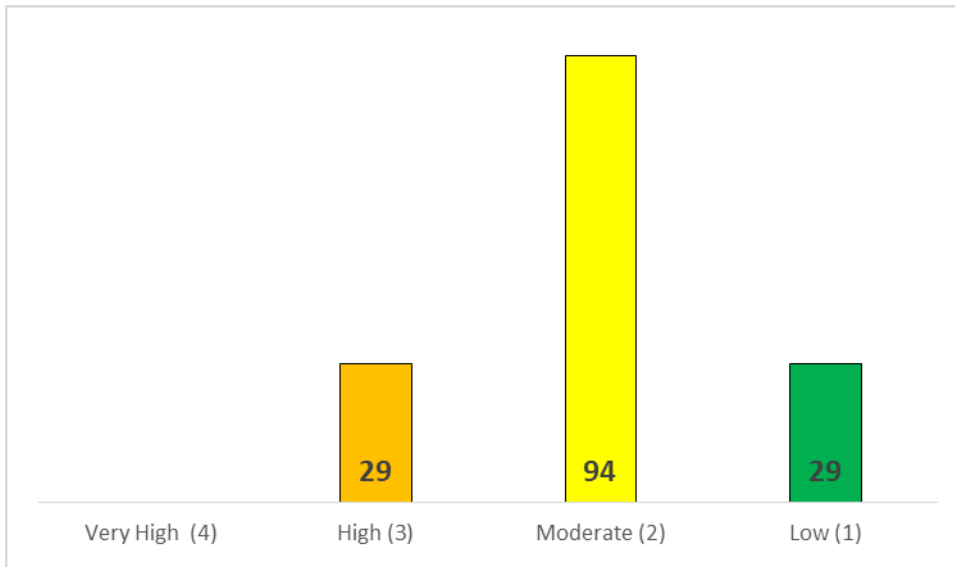
Graph 2 – Total Recommendations by Progress Status

The following graph provides a breakdown of recommendations by risk grading and shows progress with implementation – missed original timescale (RED), at risk of slippage (AMBER) or on track (GREEN). 64% of recommendations are currently on track for completion on time.

5 high risk recommendations are reported with a red status meaning they have missed their original date of completion – they are detailed within Table 1 above.

In total 48 recommendations have missed their original date of completion across all risk categories. This is an increase of 6 since the last reporting period end of March 2020.

There are some recommendations categorised as amber where there is potential for some slippage. This is due to staff currently being redeployed. We are assessing any potential delays to seek opportunities to recover the position.
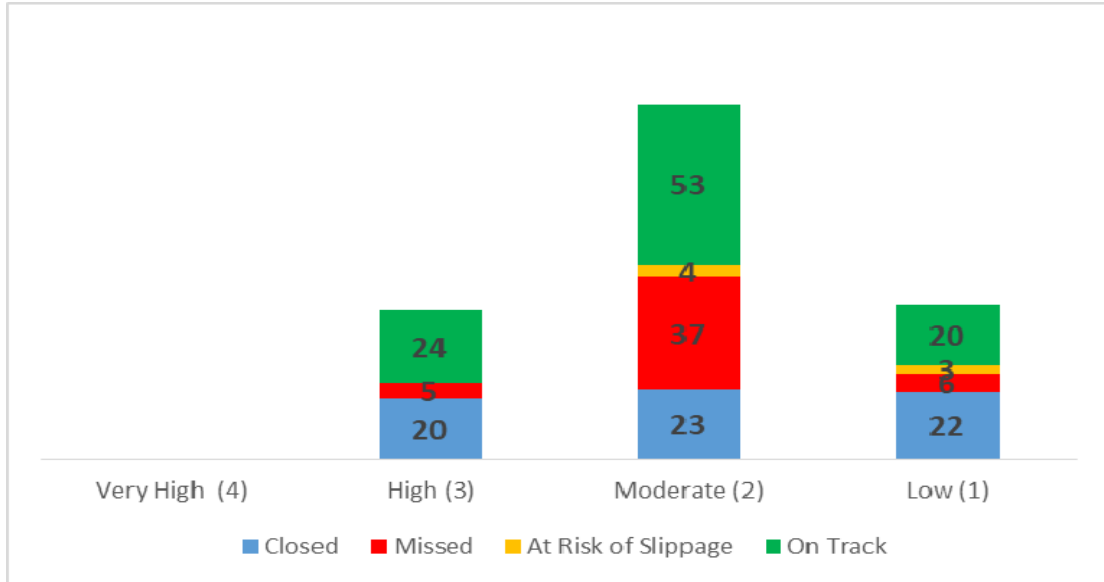
New Recommendations

As reported last quarter, HMICS published their Strategic Review of Police Scotland's Response to Online Child Sexual Abuse. The final action plan was returned to HMICS and a copy is attached at Appendix B for reference. This will also be shared with Policing Performance Committee on 26 August 2020.

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.

10. ENVIRONMENT IMPLICATIONS

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

RECOMMENDATIONS

Members are invited to discuss the content of this report.

Internal Audit Recommendations Progress Tracker - Q1 June 2020

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)	Covid-19 Impact
		Total Closed	Closed June	Missed	Slippage	On track			
IT Service Delivery **June 2017** **15 recommendations**	0	0					This was originally planned for April 2020 but due to Operation Talla work was not undertaken. A new date to test the business recovery of key systems is still under consideration.	**CDIO**	
	3	2		1					
	9	9							
	3	3							

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed June	Missed	Slippage	On track			
HR Workforce Management **July 2018** **10 recommendations**	0						WM 3.2 Monitoring of Rostering Requirements - this is being progressed by the Mobilisation Group A presentation was given to SLB in February focusing on Force Mobilisation, with a recommendation that Resource Deployment restructuring was considered a priority for the organisation. The outcome was that given this year's expected events and demands, the review/restructure would be put on hold/postponed until after Operation Urram, which was scheduled to take place in November 2020 but now postponed until 2021. A request was made to reconsider this decision in light of this delay.	**ACC Operational Support**	
	8	7				1			
	2	2							
	0								

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed June	Missed	Slippage	On track			
Staff Performance Management **December 2018** **5 recommendations**	0						The launch of My Career and the phased rollout scheduled for 1 April 2020 was paused due to Covid-19. This decision is under review and a revised date is awaited.	**DoPD**	
	1					1			
	3					3			
	1					1			

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed June	Missed	Slippage	On track			
Financial Planning **March 2019** **4 recommendations**	0						One High Risk recommendations has been closed relating to the Benefits Management Strategy which was approved by Change Board in May. ***Medium risk - Long Term Financial Plan - interim report provided on medium term planning scenarios with a full refresh of the longer term strategy was due March 2020 but due to delay in notification from Scottish Government re budget this has been further delayed to December 2020.	**CFO**	
	2	1	1						
	2	1				1			
	0								

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed June	Missed	Slippage	On track			
Information Management - Data Security Management **March 2019** **6 recommendations**	0						One High Risk recommendation relating to updating the Information Security SOP has been achieved. 2 Medium Risk recommendation - Consolidation of IM SOPs - This was drafted in Dec 2019 and external consultation with SPF has stalled the progress. Work is ongoing to resolve. There are currently excessive delays in the Policy Consultation process caused by Health and Safety representatives being unavailable. This is progressing with a dedicated IM resource assigned to this work. This will be complete by 1st August 2020. IAO handbook is being drafted in collaboration with NPCC. This work paused due to Covid-19 but is now being progressed.	**ACC Professionalism & Assurance**	
	3	2	1						
	3		1	2					
	0								

Internal Audit Recommendations Progress Tracker - Q1 June 2020

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)	Covid-19 Impact
		Total Closed	Closed June	Missed	Slippage	On track			
IT Application Review - SCOPE **March 2019** 5 recommendations	**0**						One remaining actions ongoing: * BCM/Disaster Recovery - Incremental approach preferred utilising recovery techniques (backup/restore). Unable to meet April 2020 timeline due to COVID-19 situation, given the need to have constant access to our HR / Duty Management systems, and the risk of causing interruption to service.	**CDIO**	
	3	2		1					
	2	2							
	0								

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed June	Missed	Slippage	On track			
Transformation Programme Assurance **June 2019** 6 recommendations (5 recs PS, 1 SPA)							The Benefits Management Strategy was approved by May Change Board, with caveats regarding the Agile Process. The final part of implementation requires a minor ICT change which is delaying completion.	**CDIO**	
	6	5		1					

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed June	Missed	Slippage	On track			
Stock Management **June 2019** 11 recommendations	**2**	2					The actions are at an advanced stage of completion.	**CFO**	
	5	3		2					
	4	2		2					

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed June	Missed	Slippage	On track			
IT Application Review - Efinancials and Asset 4000 **August 2019** 9 recommendations							4 actions proposed for closure. 1 action was not fully met at the end of March 2020 and delayed until July 2020 as follows: 6.1 Business Continuity Testing (M) - was planned but not appropriate at this time due to risk of testing and other pressures on ICT as a result of COVID-19 - now 31.7.2020	**CFO**	
	3		1			1			
	5	2	3						
	1								

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed June	Missed	Slippage	On track			
Payroll **December 2019** 6 recommendations							1 Medium Risk regarding Masterfile Checks was delayed from May to July due to Covid-19. 3 recommendations not yet due.	**CFO**	
	1		1						
	5		1	1		3			

Internal Audit Recommendations Progress Tracker - Q1 June 2020

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)	Covid-19 Impact
		Total Closed	Closed June	Missed	Slippage	On track			
Strategic Workforce Planning **April 2020** 5 recommendations	(red)						1High (SWP 3.1) linked to the Project Plan proposed for closure. 1 High (SWP 1.1) due 30 June 2020 linked to Communications Plan.	**DoPD**	(green)
	3		1	1		1			
	2					2			
	(green)								

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed June	Missed	Slippage	On track			
Productions **April 2020** 3 recommendations	(red)						Project deliverables and timescales and Project board actions and decisions both proposed for closure. Roles and responsibilities has slipped as was due by early June however not being presented to the Productions Project Group until 7th July, updated a new completion date for mid July.	**ACC Local Policing and CJSD**	(green)
	1		1						
	1			1					
	1		1						

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed June	Missed	Slippage	On track			
Transformation Change Programme **March 2020** 10 recommendations	(red)						**Not yet due**	**CDIO**	(green)
	5					5			
	5					5			
	(green)								

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed June	Missed	Slippage	On track			
SPA Relocation Costs **April 2020** 11 recommendations (1 for SPA)	(red)						9 recommendations have been addressed during the quarter. 4.1 Annual Reporting of Relocation Expenses. Process in place for reporting. Report to go to Succession Planning Committee in September and this will complete the action.	**CFO/ DoPD**	(green)
	8		7			1			
	2		2						
	(green)								

Audit Scotland Recommendations Progress Tracker - Q1 June 2020

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)	Covid-19 Impact
		Total Closed	Closed June	Missed	Slippage	On track			
SPA Annual Audit Report (Final) **2018/2019** **September 2019** 4 recommendations	(red)						**May 2020** 1 Medium Risk relating to Controls Environment is proposed for closure. * Medium / Long Term Financial Plans for Managing Finance Balances - timescale reset from end of March to December 2020. *Strategic Workforce Planning - due November 2020.	**CFO / DoPD**	(green)
	(orange)								
	4	1	1		1	1			
	(green)								

HMICS Recommendations Progress Tracker - Q1 June 2020

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)	Covid-19 Impact
		Total Closed	Closed June	Missed	Slippage	On track			
Custody 2014 REOPENED August 2014 15 recommendations	0						2 Proposed for closure: Estates Strategy (H) - Capital plan approved for implementation. HMICS discharged 23/06/2020. Single Cell Occupancy (L)	**ACC Local Policing + CJS**	
	5	4	1				Ongoing Health and Safety Audits (M)- Main centres complete but HMICS will not support closure until a plan is in place for all Ancillary Centres. Ancillary Centres remain on hold with Covid-19 and date moved to Dec 2020. Agreement to re-set date.		
	5	4		1					
	5	4	1						

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed June	Missed	Slippage	On track			
Forensic Services to Victims of Sexual Crime September 2017 4 recommendations							1 recommendation discharged by HMICS. R05 (Examinations carried out in healthcare facilities rather than police offices) remains a work in progress but dependent on NHS Partners. Anticipated all health boards will be compliant in the next few months. Request for discharge once fully compliant. R10 (treatment of child suspects) this is challenging and not entirely within the gift of Police Scotland to address. Meeting to be arranged with HMICS to discuss practicalities of this recommendation and relevance for Police Scotland to progress..	**ACC Crime & Public Protection**	
	2	1	1						
	2		2						

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed June	Missed	Slippage	On track			
Undercover Policing February 2018 19 recommendations							We are continuing to progress the open recommendations however at a slower pace. SOU will continue to progress these as far as possible in the interim however we will be unable to move towards a final product until after the COVID 19 restrictions. R1 - Strategy and Implementation Plan - ongoing. R13 - Substance Misuse Testing - decision taken, revised scoping work underway. R16 - Integrated Record Management System - ongoing - revised system provided by supplier for review.	**ACC OCCTI**	
	6	6							
	4	4							
	9	6		3					

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed June	Missed	Slippage	On track			
Firearms Licensing March 2018 24 recommendations							17 recommendations confirmed as discharged by HMICS, 2 remain proposed for closure and 5 ongoing: R8 relating to SOP, await policy support. R10 relating to legacy records, awaiting legal guidance R13 delay with COVID-19 as relates to GP Surgeries Further 2 propsed for closure on 18/06/2020 R14 transportation of firearms R21 refresher training R10 & R13 ESF being written up expected by end of month R8 remains ongoing with Policy Support but in a better position than previously.	**ACC Professionalism & Assurance**	
	10	1	6	3					
	14	9	5						

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed June	Missed	Slippage	On track			
Call Handling May 2018 8 recommendations	0						Recommendations at an advanced stage and waiting to discuss with C3 regarding completing closure reports to send to HMICS. Standards of Service (due to publish once approved by SLB). Vulnerability Assessment - accelerated roll out due to Covid-19. Performance Management - advanced stage.	ACC LP North + C3	
	8	5				3			
	0								
	0								

HMICS Recommendations Progress Tracker - Q1 June 2020

Risk Grading Key	**4**	Very High Risk Exposure		**3**	High Risk Exposure	**2**	Moderate Risk Exposure	**1**	Limited Risk Exposure

Adult Support Protection Joint Inspection

June 2018

16 recommendations

Risk Rating	Closed	Missed	Slippage
(red)			
1	1		
11	4	7	
4	2	2	

It should be highlighted these actions are areas for improvement and learning identified during the Joint Inspection **but are not** specific recommendations made by HMICS. Police Scotland are keen to progress these matters to demonstrate our commitment to organisational learning.

1 area for improvement is complete with the review of an Adult Protection Co-ordinator role to identify and share best practice in relation to performance and quality assurance nationally.

The outstanding areas of work require health checks undertaken in all hubs to ensure best practice around staffing, guidance, performance/demand management and quality assurance processes are in place and working well. This has been achieved for the Hubs in the East and North but work on completing health checks in the West Hubs has been put on hold meantime. This is replanned for completion end of May 2020.

Owner(s): ACC Crime & Public Protection

Title & Date of Publication	Risk Rating	No. Open & RAG				Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed June	Missed	Slippage	On track		

Review of Custody Centres 2018

August 2018

7 recommendations

Risk Rating	Total Closed	Closed June	Missed	Slippage	On track
(red)					
(amber)					
4	2		1		1
3	1		1		1

Comments:
R01 Estate strategy - Capital plan approved for implementation, subject to social distancing for contractors. Awaiting a copy to attach to closure report, SPOC for custody now on annual leave.

R02 System Improvement, workshop postponed due to COVID-19 and not suitable for teleconference. Approval to reset date.

R05 Guidance & training on RA, linked to a pilot ran in the West of the country regarding constant observations and risk assessment. Ongoing to collate information and training material being delivered as a result.

R07 UoF data, chair of the UOFMG, has now confirmed that Police Scotland will publish UOF data. Once the correct format has been agreed it will be published, probably quarterly on the PS website.

Owner(s): ACC Local Policing + CJS

Title & Date of Publication	Risk Rating	No. Open & RAG				Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed June	Missed	Slippage	On track		

Review of Delivery of the Policing Plan

March 2019

12 recommendations

Risk Rating	Total Closed	Closed June	Missed	Slippage	On track
(red)					
(amber)					
11		3			8
(green)					

Comments:
Following discussion with HMICS early June, agreement was reached to discharge 3. Subject to further evidence being provided they will also discharge a further 5 recommendations (1,2,4,5 and 10).
There is an option to discharge recommendation 8 which is linked to APU redesign and this is being considered.

Owner(s): DoBI

Title & Date of Publication	Risk Rating	No. Open & RAG				Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed June	Missed	Slippage	On track		

LP+ Greater Glasgow Inspection

March 2019

11 recommendations

Risk Rating	Total Closed	Closed June	Missed	Slippage	On track
(red)					
(amber)					
11					11
(green)					

Comments:
Action plan in place.

Owner(s): ACC Local Policing West / DoBI

Title & Date of Publication	Risk Rating	No. Open & RAG				Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed June	Missed	Slippage	On track		

Greater Glasgow Custody Inspection

June 2019

5 recommendations

Risk Rating	Total Closed	Closed June	Missed	Slippage	On track
(red)					
(amber)					
5	1	1			3
(green)					

Comments:
R01 Custody Queues, no further roll out due to staff moving to C3 during COVID-19

R03 Consistency of RA, Evidence gathering stage with this recommendation and in due course a closure report will be compiled with what has been achieved to present to SMT and query whether this will be accepted with the caveat that HMICS re-inspect at a future date.

R05 Quality Assurance, Ongoing - weekly/monthly checks/ cross cluster audits quality assurance Sgt currently in place during COVID situation. Training material to review

Owner(s): ACC Local Policing + CJS

HMICS Recommendations Progress Tracker - Q1 June 2020

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)	Covid-19 Impact
		Total Closed	Closed June	Missed	Slippage	On track		

Title & Date of Publication	Risk Rating	Total Closed	Closed June	Missed	Slippage	On track	Comments	Owner(s)	Covid-19 Impact
LP+ Events Inspection **May 2019** **15 recommendations**	(red)						**Work on hold** - Staff working full time on Op Talla so no action taken since March 2020.	**ACC Operational Support**	(orange)
	(orange)								
	15	**3**		**12**					
	(green)								

Title & Date of Publication	Risk Rating	Total Closed	Closed June	Missed	Slippage	On track	Comments	Owner(s)	Covid-19 Impact
Strategic Review of Custody **May 2019** **12 recommendations**	(red)						R07, training and support ongoing however slipping. R08, appropriate supervision ongoing however slipping. R10, constable led custody centres ongoing however slipping. Remaining 6 not yet due and remain in progress.	**ACC Local Policing + CJS** **ACC Professionalism & Assurance**	(green)
	3	**3**							
	2				**2**				
	7				**1**	**6**			

Title & Date of Publication	Risk Rating	Total Closed	Closed June	Missed	Slippage	On track	Comments	Owner(s)	Covid-19 Impact
Online Child Sexual Abuse **February 2020** **11 recommendations**	(red)						Action Plan finalised and returned to HMICS. SLWG established to progress recommendations and reports to TOCSA Tactical and Gold. First set of milestone dates set for end of July 2020.	**ACC Crime & Public Protection / ACC OCCTI**	(green)
	5					**5**			
	5					**5**			
	(green)								

Information Commissioners Office Recommendations Progress Tracker - Q1 June 2020

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)	Covid-19 Impact
		Total Closed	Closed June	Missed	Slippage	On track		
Information Commissioners Office 136 recommendations - 3 reports June 2016, September 2016 & December 2017						The last remaining action relates to maintaining staff permission levels and access which will require significant investment of time and effort to implement and maintain. ICT are developing an options appraisal for internal (ICT) consideration due end April 2020. Propose to amend target milestone date to July 2020 due to other priorities.	**CDIO / ACC Professionalism & Assurance**	
	59	59						
	26	25		1				
	51	51						

Other Recommendations Progress Tracker - Q1 June 2020

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)	Covid-19 Impact
		Total Closed	Closed June	Missed	Slippage	On track		
Mental Health Welfare Commission September 2018 1 recommendation							R05 - Significant variations of use of place of safety SharePoint site is now rolled out and it is showing variations real-time. There is still an issue with variations but we now have the capability to monitor and identify where these are. 6 monthly review of the MWC action plan is due soon so we will consider taking these figures to the Divisions when asking for their updates as to what they are doing locally to ensure accurate reporting and reducing the use of these emergency powers.	**Safer Communities**	
	1					1		

Title & Date of Publication	Risk Rating	No. Open & RAG				Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed June	Missed	Slippage	On track		
Independent Football Review March 2019 18 recommendations	1	1					There has been no further progress in relation to these actions due to staff prioritising work on Op Talla.	**ACC Local Policing West**	
	11	11						
	6	1		3	1	1		

Title & Date of Publication	Risk Rating	No. Open & RAG				Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed June	Missed	Slippage	On track		
Independent Review of Complaint Handling - Interim Report June 2019 12 recommendations							10 recommendations (2H, 5M, 3L) fully discharegd following review by Chief Superintendent on 16/06/20. 2 recs remain open-1 high (linked to organisational culture) and 1 Medium (linked to PIRC access to Centurion) which require more work and evidence before closure.	**ACC Professionalism & Assurance** **DoPD**	
	3		2			1		
	6		5			1		
	3		3					

Title & Date of Publication	Risk Rating	No. Open & RAG				Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed June	Missed	Slippage	On track		
Independent Advisory Group for Stop & Search May 2017 2 recommendations							IAGSS have made a number of recommendations within their 12 month review report however although PS will contribute to the execution, the recommendations are owned by Scottish Government. ACC Johnson attended the SPA Policing Performance Committee on 28 May and presented a paper updating them on the 2 outstanding actions from the IAGSS to the Scottish Government.	**ACC Local Policing West**	
	2					2		

Internal Recommendations Progress Tracker - Q1 June 2020

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)	Covid-19 Impact
		Total Closed	Closed June	Missed	Slippage	On track			
Cybercrime committed against Children (PS Audit) **July 2019** 2 recommendations	2		2				Discharged both these recommendations as they duplicate recommendations made in the 2020 Online Child Sexual Abuse review carried out by HMICS, note recommendations will be tracked through this channel instead.	**ACC OCCTI**	

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed June	Missed	Slippage	On track			
SWDF - Adoption, Maternity and Paternity Action Plan **July 2019** 4 recommendations	4	1				3	Actions progressing and partially complete. Report to be compiled for Chair of SWDF on outcomes to seek agreement to close.	**DoPD**	

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed June	Missed	Slippage	On track			
Freedom of Information November 2019 6 recommendations	4	4					Remaining Improvement action related to FOI awareness delivered to all divisions (geographical and specialist) is proposed for closure.	**ACC Professionalism & Assurance**	
	2	1	1						

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed June	Missed	Slippage	On track			
SCQF February 2020 5 Recommendations	3	1				2	Outstanding actions to be presented to Quality Assurance Committee on 16th June for approval-on track for completion by June.	**DoPD**	
	2	2							

Internal Recommendations Progress Tracker - Q1 June 2020

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)	Covid-19 Impact
		Total Closed	Closed June	Missed	Slippage	On track			

Title & Date of Publication	Risk Rating	Total Closed	Closed June	Missed	Slippage	On track	Comments	Owner(s)	Covid-19 Impact
Review of Armoury, Jackton November 2019 6 recommendations							Actions progressing. Minor slippage relating to SOPs.	**ACC Operational Support**	
	1					**1**			
	5				**2**	**3**			

Title & Date of Publication	Risk Rating	Total Closed	Closed June	Missed	Slippage	On track	Comments	Owner(s)	Covid-19 Impact
EqHRIA February 2020 6 recommendations							Contact made with business area to provide details of their action plan including SPOC and timescales along with any relevant updates. Planned meeting for 26th June 2020 to complete the above.	**ACC Safer Communities**	
	3					**3**			
	3					**3**			

Title & Date of Publication	Risk Rating	Total Closed	Closed June	Missed	Slippage	On track	Comments	Owner(s)	Covid-19 Impact
Complaints six stage process November 2019 17 recommendations							Discharge of 11 recommendations approved on 16/06/20 by Chief Superintendent PSD.	**ACC Professionalism & Assurance**	
	17	**3**	**11**			**3**			

Title & Date of Publication	Risk Rating	Total Closed	Closed June	Missed	Slippage	On track	Comments	Owner(s)	Covid-19 Impact
Scottish Crime Recording Standard Annual Audit **~NEW~** **March 2020** **4 recommendations**							Working Group established with a view to publish review findings in mid September.	**ACC Crime**	
	4					**4**			

Date Published	U R N	Summary Title	Recommendation	Risk / Outcome / Background	Risk Exposure	Action to be taken	Date of Completion	Update	Executive Owner
2020-02	OCSA-R1	Improve assessment of recorded data - Use of Markers	Police Scotland should improve the means by which recorded data can accurately inform assessment of the scale and nature of online child sexual abuse.	There has been some activity to try to establish the scope and nature of online child sexual abuse across Scotland, however **inhibitors have included challenges in relation to the use of 'markers' and incompatible data systems.** That said, most of the analytical work conducted relates to the broader disciplines with a limited focus on the online child sexual abuse aspect of child abuse. There is an ongoing drive to improve the use of intelligence markers as they relate to cybercrime. The instruction to apply such a marker was first issued in a force memo in April 2016, and was reinforced by a further memo in October 2018. The Cybercrime Strategic Assessment January – December 2018 highlighted the inaccurate use of the cybercrime marker. The introduction of a marketing strategy, 'Tag It, Mark It, Log It' is aimed at achieving improvements in this area. In the absence of integrated data systems, it is an essential requirement to ensure the appropriate use of such intelligence markers to assess accurately the scope of online child sexual abuse across Scotland. **It is of note that the absence of quality data has been of concern to business leads for some time and some localised efforts have been made to address this issue.**	Medium	1. Review of markers relating to Child Sexual Abuse to ensure they are captured in a single place. 2. Depending on the outcome of the review above, determine communications for Local Policing Divisions to ensure compliance. 3. Continue to work nationally to feed in requirements in respect of markers to the Core Operational Policing Solution. (Action to link in with Callum Young to identify evidence of this being in place within plans).	Final date is dependent on COS roll out.	The Cyber and Technical Surveillance Programme (CTSP) continues to work with all concerned in relation to the proper identification of Incidents and Crimes which have a cyber relevance, not restricted to CSAE, in terms of being either Cyber enabled or Cyber dependent. There has been a considerable amount of work carried out in relation to this however recognising the starting point, there remains a considerable amount of work to be done in the future. The evidence is supported via the Force memos, Intranet pages, PowerPoint and obviously the PC Taggit initiative. The following Force Memo PS 045/16 and 144/18 have been distributed as well as the a PowerPoint presentation all of which is available on the Force intranet and referenced in the Cybercrime and OCCTU Cybercrime pages. Cyber Investigations review all these tagged incidents and crimes on a daily basis to ensure that we have an awareness of and are able to take ownership or support when appropriate. In the absence of a single application in terms of incidents and crimes, Cybercrime CTSP is working with the project teams to ensure that the new Crime Management application and COS has the capability to adequately record Cyber enabled or dependent crime to assist early identification.	ACC Major Crime and Public Protection & ACC OCCTI
2020-02	OCSA-R2	Analytical Resource	Police Scotland should review the level of analytical support provided to the Public Protection business area and consider the appointment of a dedicated analytical resource.	Scottish Government Project Funding has recently been secured to employ three additional dedicated analysts to Cybercrime Intelligence and Digital Forensics. However, none of these posts has a specific remit to analyse the scope and impact of child abuse, including that committed online. Further, there is no dedicated analyst assigned to the various business areas that are the strategic responsibility of SCD Public Protection. As a result, any analytical work requires to be outsourced and therefore compete against other business areas. The subject of online child sexual abuse, and indeed SCD Public Protection business area, would benefit from dedicated analytical support in what is undoubtedly a growing area of business. In 2018 we conducted a Thematic Review of Police Scotland's approach to the development and operational delivery of the Annual Police Plan 2018-19. At that time we found an imbalance between intelligence analysis and performance analysis and asked Police Scotland to consider a more direct alignment of intelligence analysts and SCD. The structure however remains as it was and we are of the view that the absence of meaningful analytical products to fully inform the scale, nature and future threat of online child sexual abuse symptomatic of the flaws in the current structure.	High	1. Establish position regarding the agreement for the recruitment of 3 dedicated PPU Analysts. (COMPLETE) 2. Carry out end to end process Continuous Improvement Review of Online Child Abuse processes along and produce report along with workforce planning requirement for consideration. 3. Develop Request to re-submit through the Tasking Process via ACC. (COMPLETE) *This recommendation cross-references with an action from Thematic Review of the Annual Policing Plan.*	31/07/2020 Milestone Date	Tasking request resubmitted and resulted in the allocation of 5 analysts from APU being dedicated to PPU work and now tasked with the production of the Strategic Threat Assessment. An internal review within SCD has established the current allocation of APU analysts and the work requirements identified. This internal review will be used to inform the current proposals in relation to APU redesign. ACC Sloan, ACC McLaren and Tom McMahon, Director of Business Integration, met to discuss the most recent proposals which include an option to realign dedicated APU resources under SCD. A Short Life Working Group has been established to take forward an overarching review of resourcing along with an end to end process review. This review will be advised by Police Scotland's Continuous Improvement Team. Both resource and process reviews will be complete by end of June 2020 where further actions will be identified and this action plan updated.	ACC Major Crime and Public Protection, ACC OCCTI, Director of Business Integration
2020-02	OCSA-R3	Strategic Governance Framework	Police Scotland should ensure a strategic governance framework is in place, which provides support, direction, scrutiny and quality assurance to the force's response to online child sexual abuse.	Our review confirmed that staff we spoke to in local policing and other areas responsible for delivering a front line response were unclear about the existence of a force strategic direction in relation to online child sexual abuse. Police Scotland is an active member of important national (UK) strategic network arrangements including the jointly chaired National Crime Agency/UK Government Pursue and Prevent Boards and the National Police Chiefs' Council (NPCC). online child sexual abuse features prominently in both forums. These forums meet to progress strategic actions at a UK level and we found that this provides Police Scotland with the appropriate platform and interface from which to both contribute and benefit. The Police Scotland Tackling Online Child Sexual Abuse (TOSCA) Strategic Group was established to provide appropriate governance and strategic direction in relation to online sexual offending against children. Membership includes ACC OCCTU and Intelligence, Detective Chief Superintendents from Public Protection, Intelligence, OCCTU and local policing. It is chaired by ACC Major Crime and Public Protection and includes additional representation from the Analysis and Performance Unit and COPFS. The group was scheduled to meet on a quarterly basis but this had fallen away over recent years. While all of the relevant constituent functions had a clear understanding of the organisational risk as well as the individual and collective risk to children presented by online child sexual abuse, we found that distinct departmental priorities created a "silo based" approach. HMICS found the TOSCA Strategic Group has recently been reinstated in the strategic diary, however this group had not met for some considerable time. As a result, there was previously no structure in which to hold the respective Detective Chief Superintendents to account. It is reasonable to assume that the absence of this strategic structure has contributed to the disconnect between the constituent elements of the end-to-end response.	High	1. Reinstate TOSCA Group. 2. Develop a schedule of meetings. 3. Terms of Reference of the group to be reviewed and updated to include outcomes and delivery, scrutiny arrangements and quality assurance processes. 4. Update membership at Tactical Group to include representation from NCA and CEOP.	31/07/2020	The Gold Group has been re-established and met on 29 May 2020. The terms of reference were discussed and are out for consultation with members. It was further agreed that an invitation would be extended to include representation from NCA and CEOP at the Tactical Group. This cross references with Recommendation 7 below to improve multi-agency working.	ACC Major Crime and Public Protection
2020-02	OCSA-R4	Strategic Threat Assessment	Police Scotland should undertake an Online Child Sexual Abuse Strategic Threat Assessment to accurately identify the scale, nature and threat to children from online child sexual abuse.	Police Scotland has in place individual Strategic Assessments for thematic business areas (including cybercrime and online grooming) in addition to the overarching organisational Strategic Assessment that features online child sexual abuse. Separately the NCA, as a critical partner to tackle online child sexual abuse, has its own Strategic Assessment. These products were developed in isolation and whilst they do not appear to be in conflict with each other, it would be good practice for Police Scotland and the NCA to collaborate more on future assessments. Despite this being a rapidly increasing area of police business, Police Scotland has no specific Strategic Threat Assessment that addresses the issue of online child sexual abuse. Rather online child sexual abuse is a cursory feature contained within a broader perspective. A Strategic Threat Assessment is an essential product in identifying the scale, nature and threat of any issue and in informing strategic planning. Its absence is impeding a coherent strategy for dealing with online child sexual abuse.	High	1. This action is dependent on securing the resources identified at Recommendation 2 above. Update on progress with recruitment to be ascertained. (COMPLETE) 2. Produce Strategic Threat Assessment for Online Child Sexual Abuse.	30/09/2020 Phase 1	A Strategic Threat Assessment was completed last year specifically in relation to online grooming and was not broad enough to include the wider aspects of Child Sexual Abuse. Now that the additional analytical resources have been secured as per the update at Recommendation 2, work on undertaking the Strategic Threat Assessment for Online Child Sexual Abuse is underway. Due to the scale of work required this will be undertaken on a phased approach with phase 1 due for completion by end of August - taking into consideration how Covid-19 is impacting on operations and resources. APU staff have engaged with SMT from SCD PPU and have been provided links and contact details/introductions to the authors of the NCA Strategic Assessment to ensure a cohesive approach.	ACC Major Crime and Public Protection, ACC OCCTI, Director of Business Integration

Date	Ref	Title	Recommendation	Finding	Risk	Actions	Milestone	Response	Owner
2020-02	OCSA-R5	Allocation of Specialist Support	Police Scotland should review the current arrangements for allocation of specialist support in relation to online child sexual abuse to ensure the allocation is fair, equitable and meet the needs across the country.	A weekly inter-departmental meeting convenes each Monday, attended by the Internet Investigations Unit (IIU), Cybercrime Unit and NCAIU. This is effectively a tasking forum that facilitates discussion around the NOCAP packages that are actionable and deals with prioritisation and grading of risk. This forum is chaired by IIU and, using the KIRAT2 (Kent Internet Risk Assessment Tool), actionable packages are graded according to risk. This meeting provides an opportunity for overview of the current risk and the anticipated immediate specialist resource requirement across the force.

HMICS found that the process for assessment of the requirement for specialist resources is not reliable as packages that are distributed to overt resources require some additional local enquiry including warrant applications, and the relevant timescales in relation to this activity cannot be accurately determined. As a result, on a regular basis, specialist support such as onsite preview examination and equipment triage is requested in the form of a telephone call direct from divisions to the local Cybercrime Unit hub.

It was notable that territorial policing resources were more familiar with the weekly NOCAP Strategy Group meeting than the SCD tactical tasking meeting, which is a reflection of the current value of the SCD tactical tasking process in relation to online child sexual abuse.

The use of less formal arrangements for securing specialist and/or additional resources is not in keeping with a balanced and impartial allocation of such resources and is not conducive to effective planning. | Medium | 1. Review / revise tasking process as part of the end to end process review. In particular review the decision making process and ownership of risk. The review will seek to understand the resources required from the initial triage and assessment (IIU), development and investigations (NCAIU and Local Policing) and evidential recovery and court preparation (Cyber Investigations and DF(CIDF).

2. Implement actions identified from process improvement review and in particular improve communication and governance, to ensure compliance and delivery of revised processes.

3. Clarify with HMICS understanding regarding the NOCAP process with respect to multi agency tasking. | 31/07/2020

Milestone Date | The ongoing review will seek to identify and establish a comprehensive understanding of the resources required from the initial triage and assessment (IIU), Development and Investigations (NCAIU and Local Policing), Evidential Recovery and Court Preparation (Cyber Investigations & DF(CIDF)). This will provide clarity across a complex area which involves a number of interdependencies. A review has already resulted in a realignment of a number of resources to increase capacity within IIU to address risk, and realignment of existing posts within NCAIU to increase capacity to respond to online investigations. The allocation of specialist resources remains under review as part of the end to end process review. | ACC Major Crime and Public Protection, ACC OCCTI |
| 2020-02 | OCSA-R6 | Resource & Structure of Specialist Units | Police Scotland should review the resources and structure of the Internet Investigation Unit and Telecommunications Investigation Unit to ensure that the force is able to meet current and future demand in relation to initial risk assessment, triage and intelligence development. | At 25 November 2019, IIU was in receipt of 1600 referrals for the year which is a 40% increase on the same period in 2018. This intelligence resulted in 750 NOCAP packages. Police Scotland has since confirmed that the total number of referrals for the 2019 calendar year is 1961, which generated 913 packages.

As a result of this increase in referrals, NOCAP has significantly affected the ability of the IIU and TIU to service other areas of business.

Previously NCA carried out all research into NOCAP packages prior to onward transmission, however Police Scotland took over this responsibility in order to reduce time delays thereby maximising the chances of the intelligence leading to a successful warrant application. Police Scotland has succeeded in reducing delays, but this has come at the cost of increasing the volume of work undertaken by the IIU and TIU.

Further, additional funding to Regional Organised Crime Units across England and Wales, and in particular to NCA, is likely to result in an increase in their capacity and with it an increase in referrals. The NCA is not responsible for the operational enforcement activity in Scotland, consequently the burden of triage, tasking and enforcement rests with Police Scotland.

Currently in Police Scotland, volumes in the context of resource levels are such that there is a backlog within IIU that varies but, as an example, was sitting at 450 in November 2019. All of the intelligence packages under development are subject of an initial triage process and risk assessment using an accredited risk assessment tool.

The levels of referrals have continued to increase and are anticipated to continue to increase at a significant rate. As such, the resource levels committed by Police Scotland to deal with the initial risk assessment, triage and intelligence development in respect of NOCAP requires urgent review. | High | 1. Develop proposals for revised staffing/operating model and conduct review in 12 months time to identify impact.

2. The action at R4 re Strategic Assessment will support the future understanding of current and future demand.

3. End to end process review to support understanding of workflow, relationships and demands. | 31/07/2020

Milestone Date | Discussions are ongoing to identify future resourcing requirements alongside an end to end process review. We will seek to create additional capacity within the teams to improve our approach, at the same time recognising that any increase in one area will need to be replicated in others to avoid any negative impact downstream. | ACC Major Crime and Public Protection, ACC OCCTI |
| 2020-02 | OCSA-R7 | Police Scotland and NCA working | Police Scotland and National Crime Agency should work together to ensure that all capabilities are being exploited to their full potential and intelligence is shared effectively. | Police Scotland's principal law enforcement partner in respect of online child sexual abuse is NCA. They are the conduit for Scotland-related intelligence referrals from across the world, however, they do not provide investigative resources for online child sexual abuse and they do not carry the risk associated with any referrals they pass to Police Scotland.

HMICS found that this has presented challenges in the past in terms of time taken to carry out research (para 94), and this has resulted in revised processes. Similarly, NCA leads the UK online Pursue response to 'dark web' offending. Our review identified differing views on the **part of NCA and Police Scotland about how to use intelligence.** Once Police Scotland has received the intelligence from the NCA, it carries the risk caused by any delay.

At the time of our review this delay had been acknowledged by both Police Scotland and the NCA and steps were underway to address this situation. Given that some of the most prolific and concerning activity takes place within "dark net" space, HMICS considers this requires an urgent solution.

NCA reports that there are rich opportunities to identify offenders and inform prevention activity that are available to all law enforcement, however, they are not being utilised to their full capacity by Police Scotland.

Police Scotland contributes £5.2m annually to be part of the UK Organised Crime Partnership and should benefit from the assets and expertise held by the NCA.

While Police Scotland has access to the Child Abuse Image Database (CAID) and NCMEC portals, each of these systems requires to be independently accessed during the IIU triage phase. This is a time consuming and cumbersome process. A business case has been submitted to introduce a management system that automatically links to both databases simultaneously. The introduction of such a system would significantly improve turnaround timescales for referrals. | High | 1. Further review with HMICS to update on revised NCA arrangements.

2. NCA and CEOP invited to attend Tactical level meetings to improve joint working relationships and to be represented at TOCSA Strategic Meeting.

3. Clarify with HMICS regarding outcome of this recommendation. | 31/07/2020

Milestone Date | Since the review took place there has been changes within NCA which may negate the need for this recommendation. A VPN is now in place which is speeding up turnaround timescales for referrals.

In order to improve multi-agency working, we have extended an invitation to NCA and CEOP to attend our Tactical level meetings which will seek to review ongoing operations as well as highlight problems and resolve at an early stage. NCA and CEOP have further been invited to attend our Strategic Meeting. | ACC Major Crime and Public Protection |

2020-02	OCSA-R8	Police Scotland and Crown Office approach to Digital Forensic Examination Requests	Police Scotland should work with the Crown Office and Procurator Fiscal Service to establish a pragmatic and realistic approach to digital forensic examination requests.	The preliminary examination of devices at the site of the enforcement activity eliminates the unnecessary seizure of devices and other digital equipment that would subsequently require a full forensic examination. Cybercrime case management data for the three month period September, October and November 2019 confirms that 86% of devices submitted for digital examination were mobile phones, sexual crime was the most prominent crime type and of that, rape was the most frequent crime followed closely by IIOC. The Digital Forensic Gateway is the receiving facility for all Examination Request Forms where triage and quality control functions are conducted. Gateway staff are co-located with the digital forensic teams to provide a robust and consistent process. We found that there remains a tendency for front line officers, due to a lack of experience or knowledge, to seize devices unnecessarily for subsequent examination. The deployment of digital forensic examiners to provide on-site advice and expertise reduces this demand. Police Scotland operates with a significant backlog of devices awaiting forensic examination, however they have successfully reduced this from a typical number of around 1200 outstanding devices to 500 in December 2019. This is as a result of a review and revision of internal processes. HMICS acknowledges the considerable effort that has been made to reduce this backlog and would urge Police Scotland to ensure this is sustained. HMICS believes that the roll out of cyber kiosks will enhance Police Scotland's capability in digital forensic case management. HMICS also acknowledge that the demand for digital forensics, and in particular the backlog, is influenced by COPFS who regularly make requests to conduct initial or supplementary forensic examinations. Advances in technology and the vast amount of data being held on devices are such that blanket requests to 'examine everything', made as a matter of routine, are increasingly unrealistic and have a substantial subsequent impact on Police Scotland's digital forensic capability. A radical rethink regarding the practicalities of sustaining the current approach is required.	Medium	1. An end to end process review of Digital Forensic process including everything within the current backlog has been actioned. 2. Delivery of the Case Management application (Agreed via Procurement and now with ICT) 3. Development of NUIX application within Police Scotland and with COPFS will assist as interim finding are very positive with application having the potential to meet the requirements of both the investigating/reporting officer and COPFS. 4. Extension of Cyber Gateway support (Gateway about to extend working to Day/Late shift.) 5. delivery of Cyber Kiosks throughout Police Scotland fully networked to enable MI should longer term support DF backlog and demand. 6. TOSCA Gold to engage with Crown regarding issues.	31 December 2020 Milestone Date	COPFS and CIDF liaison - there have been a number of discussions around the forensic examination requests for COPFS as outlined in their SFI (Standard Forensic Instruction) received by the Reporting officers and DF examiners. The challenge of Covid 19 has delayed progress although there is recognition on both PSoS and COPFS that this needs to be developed. At the CIDF CPD event in January 2020, COPFS provided a well received training input and agreed actions to continue this development. Iain Logan at COPFS is leading from their perspective. Digital Forensic Backlog - current DF backlog has been outlined within a briefing paper and submitted for consideration. Under the CTSP - An end to end process review of Digital Forensic process including everything within the current backlog has been actioned. - Delivery of the Case Management application (Agreed via Procurement and now with ICT) - Development of NUIX application within Police Scotland and with COPFS will assist as interim finding are very positive with application having the potential to meet the requirements of both the investigating/reporting officer and COPFS. - Extension of Cyber Gateway support (Gateway about to extend working to Day/Late shift.) - Delivery of Cyber Kiosks throughout Police Scotland fully networked to enable MI should longer term support DF backlog and demand. In addition, a commitment was made by TOCSA Gold to engage with Crown to address any issues.	ACC Major Crime and Public Protection
2020-02	OCSA-R9	Undercover Operatives	Police Scotland should review its capacity and capability to conduct undercover online covert operations in support of its policing priorities and ensure that undercover online operatives are sufficiently equipped and supported to identify and equitably assess the risk to children as a result of online offending.	Less than 16% of the SOU undercover cadre are trained in UCOL. The team's capability is exclusively undercover deployment and they are required to rely on assistance for case development and intelligence support from other departments. Notwithstanding the increase in UCOL operations, our 2018 report noted that, "we believe that undercover advanced officers and undercover online officers has been underutilised. This is a position that has been accepted by Police Scotland." As part of the regular inspection of Police Scotland's use of statutory investigatory powers, the Investigatory Powers Commissioner's Office (IPCO) report of 2018 highlighted surprise at a lack of intelligence, analytical and investigatory support for UCO.42 In particular the IPCO noted that; "once an opportunity is identified by the undercover operatives, a request for overt resources has to be made to senior officers within the relevant division. In a number of cases evidenced during the inspection, there has been a delay in attracting the appropriate resources and therefore evidential opportunities have been missed." While IPCO has highlighted the impact on evidential opportunities, of greater significance in the context of online child sexual abuse is the continued harm being caused to children. HMICS is aware of evidence of a previous long-running UCOL operation in relation to online child sexual abuse that was successful, detecting 26 online offenders. However, the case did feature a lack of appropriate intelligence support (the issue highlighted by IPCO) that impacted on the ability to adequately manage risk and develop investigations. A key finding in our 2018 report was: Two of the key elements within the Policing 2026 strategy relate to online safety and the response to serious organised crime. The capacity and capability within Police Scotland to conduct undercover policing in support of these is currently limited and needs to be further developed. Despite being advised in 2018 that the deployment of UCOL operatives was an underused tactic, Police Scotland has made little progress, and indeed there has been a regression in this area of business against a backdrop of increased demand.	Medium	1. Carry out end to end Continuous Improvement Review of Online Child Abuse processes along with a review of all specialist support resourcing with a view to producing an interim report for consideration by end of June.	31/07/2020 Milestone Date	**May 2020** This will form part of the end to end Continuous Improvement Review and a wider review of specialist resources. Proposals will be submitted end of June for consideration. There is currently ongoing work between the different business areas to address this recommendation, utilising relevant authorities.	ACC Major Crime and Public Protection
2020-02	OCSA-R10	Deploying Undercover Resources	Police Scotland should ensure that arrangements for deploying undercover online specialist resources are directed by formal tasking arrangements aligned to risk, priority and demand.	HMICS found evidence of the SOU self-generating UCOL operations, which were then approved at Detective Chief Superintendent level without going through formal tasking and co-ordinating process. This approach to the allocation of scarce specialist covert assets is inappropriate. It does not take account of the demand for covert support from across the organisation, nor of the prioritisation arrangements aligned to prescribed risk assessment processes. Given the commitment to its own, self-selected operations, the SOU was unable to meet requests for undercover support for any other work. To ensure that the operational activity of the SOU, in common with all other aspects of Police Scotland, is informed by risk, priority and demand, it should be directed by robust and effective tasking and co-ordination processes. Although the sensitivity of covert options and assets require protection, this is not a standalone area of business and should not be allowed to operate as such.	Medium	1. Carry out end to end Continuous Improvement Review of Online Child Abuse processes along with all tasking processes. 2. This recommendation cross references to Recommendation 1 within the Undercover Policing Review.	31/07/2020 Milestone Date Link to R1 UCP Review	As part of our response to Recommendation 1 - Undercover Policing Review, we are setting out our commitment to deploying Undercover resources in the most effective way to deliver against our Force Strategy - Policing 2026. From 2020, the SOU have an allocated budget which will allow support to be provided to the most appropriate investigations. This is a significant change from previous years when costs were cross charged to specialist departments or territorial divisions. In 2019 SOU delivered the first SIO awareness seminar. This seminar was well received and plans are in place to continue with these seminars throughout 2020. In addition SOU are commencing a series of visits to territorial divisions to raise awareness and highlight the support that is available in respect of investigation of serious organised or complex crime, including child sexual abuse (CSA), not withstanding the impact of COVID-19.	ACC Major Crime and Public Protection & ACC OCCTI