

<b>Meeting</b>	<b>SPA Audit Risk and Assurance Committee</b>
<b>Date</b>	<b>15 September 2020</b>
<b>Location</b>	<b>Video Conference</b>
<b>Title of Paper</b>	<b>SPA Audit and Improvement Recommendations Update (including ICO)</b>
<b>Presented By</b>	<b>Lynn Brown, Interim Chief Executive and Graham Stickle Risk Manager, SPA</b>
<b>Recommendation to Members</b>	<b>For discussion</b>
<b>Appendix Attached</b>	<b>Yes</b>  <b>Appendices Recommendations from:-</b> <b>A &amp; B ICO</b> <b>C HMICS Action Plan</b> <b>D Audit Scotland</b> <b>E SPA Business Plan</b>

**PURPOSE**

To provide the Audit Risk and Assurance Committee (ARAC) with an update on current open recommendations from all SPA audit and improvement activity.

## 1. BACKGROUND

- 1.1 SPA audit and improvement recommendations were previously reported to the Audit Risk and Assurance Committee (ARAC) on the 16 July 2020.
- 1.2 An update on implementation of the improvements set out in HMICS Thematic Inspection of the Scottish Police Authority Forensic Service is provided to the SPA Forensic Services Committee on a quarterly basis.
- 1.3 An update on the progress of the recommendations from Dame Elish Angiolini's Preliminary Report were provided to the Complaints and Conduct Committee on 27 August 2020.

## 2. FURTHER DETAIL ON THE REPORT TOPIC

- 2.1 An Update on progress against the delivery of the SPA Business Plan is reporting to the ARAC for the first time – details shown at Appendix E. Progress updates will be provided to future meetings of the ARAC.
- 2.2 Below is a summary of all SPA's outstanding Audit/Inspection recommendations: -

Body/Report	No of Open Actions	Comments
National Records of Scotland	14 No change since May	An update is due to be submitted to the Records Keeper in October to advise the current position. Working alongside Police Scotland, SPA are progressing a file mapping project to assist meeting SPA requirements of the plan.
ICO	22 Reduction of 5 since July	The breakdown of the classification of the outstanding recommendations is; Urgent        2 High         5 Medium      13 Low          2  Of those recommendations the following 17 classifications are partially complete;

Body/Report	No of Open Actions	Comments
		Urgent 2 High 3 Medium 11 Low 1
HMICS	13 No change since July	Appendix C shows the action plan and progress to address the recommendations from HMICS Thematic Inspection of the Scottish Police Authority Published Sept 19 this HMICS inspection.  One historic recommendation remains open relating to the governance and engagement around the strategic assessment
Audit Scotland	4 Reduction of 1 since July	Appendix D outlines the outstanding recommendations and the current status. Publication of the Robert Black report closing 1 recommendation
Internal Audit	9 Increase of 8 since July	One action relating to the Cyber Security Audit has been completed on time. The eight other actions relating to the Cyber Security and Data Protection & Retention Audits are not yet due  One outstanding action relates to SPA Corporate implementing a Corporate Services Board similar to that operated by Forensic Services
SPA Improvement Plan	4 Reduction of 1 since July	Three open actions relate to the implementation of the new corporate structure. The remaining open action relates to review/update of SPA Governance documentation Objective 3.5 Refresh SPA website content, navigation and accessibility - delivered 6th August 2020

**3. FINANCIAL IMPLICATIONS**

- 3.1 There are no financial implications associated with this paper.  
There are financial implications associated with addressing recommendations

**4. PERSONNEL IMPLICATIONS**

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

**5. LEGAL IMPLICATIONS**

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

**6. REPUTATIONAL IMPLICATIONS**

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

**7. SOCIAL IMPLICATIONS**

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

**8. COMMUNITY IMPACT**

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

**9. EQUALITIES IMPLICATIONS**

- 9.1 There are no equality implications associated with this paper.

**10. ENVIRONMENT IMPLICATIONS**

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

**RECOMMENDATIONS**

Members are requested to:

- I. Discuss the content of this paper and the appended improvement recommendations

## APPENDIX A

### SPA Information Management Report – ICO GDPR Audit SEPTEMBER 2020

#### Outstanding Actions – ICO Audit Report January 2019

There were 75 recommendations in the 2018/9 audit, the details of which can be found at <https://ico.org.uk/media/action-weve-taken/audits-and-advisory-visits/2614386/scottish-police-authority-follow-up-audit-executive-summary-v10.pdf>

There are currently **22** recommendations outstanding from this audit.

The breakdown of the classification of the outstanding recommendations is;

Urgent	2
High	5
Medium	13
Low	2

Of those recommendations the following 17 classifications are partially complete;

Urgent	2
High	3
Medium	11
Low	1

This represents an improvement of 5 actions completed since the previous report. The completed actions have been left on the spreadsheet for this meeting to allow Committee Members to view the actions.

#### Scott Moncrieff Data Audit

Of the nine improvement actions identified by Scott Moncrieff during their audit, none are currently at their target date, however, 2 have been closed.

APPENDIX B		ICO Audit Report Jan 2019 Outstanding Actions: September 2020							
Ref	Non-conformity	Recommendation	Priority	Accepted / Partially Accepted / Rejected	Agreed Action	Implementation Date	Owner	Update at 18 months	Action Status
A6	The Hardware Asset Register is currently maintained in a form which prevents SPA from having regular access, and from being able to gain assurance that the register is kept up to date and accurate.	It was identified during the audit that there is an ongoing project to improve the Hardware Asset Register used by Police Service of Scotland (PSOs) in relation to SPA. This project should continue as planned, and SPA should ensure that assets which they rely on are tracked sufficiently to give SPA assurance of their security.	Medium	Accept	Ongoing Liaison with ICT. Due date for completion April 2019. The Register will be read-only for all users and only the IT administrators will be able to update. SPA can be provided with scheduled reports that will contain all up to date SPA hardware assets.		ICT	13/01 No complete register provided by ICT to date. Some work has been done, but not yet complete. Raised with ICT Head of Service Management Jan 2020, who will come back with what they currently have for us to consider closing action. 04/20 IT have advised that the action has been completed. SPA to test remotely.	
A7	The Software Asset Register is currently maintained in a form which prevents SPA from having regular access, and from being able to gain assurance that the register is kept up to date and accurate.	It was identified during the audit that there is an ongoing project to improve the Software Asset Register used by PSOs in relation to SPA. This project should continue as planned, and SPA should ensure that assets which they rely on are tracked sufficiently to give SPA assurance of their security.	Medium	Accept	Work on the Software Register has commenced. The register will cover software in use but no details regards licensing to start with. As per the Hardware Register reports can be requested that will contain SPA associated software.	Aug-19	ICT	Update requested from ICT 8/8/19. 1 October, still no update. ICT head of Service Management asked for update by Feb 20. The update was not received. 04/20 IT have advised that the action has been completed.	
A10	No physical checks are carried out on the existing Hardware and Software Asset Registers.	As the new Asset Registers are developed, SPA should ensure that there is a process built in to carry out regular physical checks of their accuracy.	Medium	Accept	Develop a process to audit accuracy	Apr/Aug 19	IM Auditor	June 2019: first version of RAS register audited and issues raised. ICT to review. 11/11 New register delivered but returned as also contained out of date information. New register provided 25/11 now accurate, but still need rest of hardware. Resources will be required to audit actions A6, A7 and A10. Sept 20, Audit officer role in new structure, however unclear how much of this resource IM will have as it doesnt sit under IM. Counter proposal submitted for post to sit under IM	
A18	<p>a) Whilst Forensic Services have carried out a programme of physical access log reviews as part of their ISO 17025 management system, these have not been recorded.</p> <p>b) The SPA corporate office have not carried out any physical security reviews.</p>	<p>a) Where physical access log reviews are carried out, these should be recorded and any findings reported to the IMT.</p> <p>b) It was noted during the audit that the lack of physical security reviews carried out by the IMT is due to a lack of resources. This is in the process of being remedied, with the recruitment of an Internal Auditor. SPA should ensure that the Internal Auditor carries out a review of physical access logs as part of the Internal Audit Schedule.</p>	Medium	Accept	FS BS 0005 SOP provides Admin Supervisor with instruction for monthly checks. Provide SOP and examples of BS 0010 and 0043F of monthly checks as evidence.		IM	Logs had been reviewed by IM, just not regularly. IM does not currently have the additional resource it needs to undertake audit work. Sept 20, Audit officer role in new structure, however unclear how much of this resource IM will have as it doesnt sit under IM. Counter proposal submitted for post to sit under IM	
A20	<p>a) SPA has not conducted any review of the security of the PSoS file storage sites that are used for long term storage.</p> <p>b) The Complaints Office contains locked filing cabinets, the keys for which are insecurely stored out side of working hours.</p>	<p>a) SPA should build security reviews of storage areas run by 3rd parties into the proposed Internal Audit process.</p> <p>b) SPA should strongly consider including the keys for the locking cabinets in the Complaints Office in the general key management approach, and store them overnight in the locked box at security.</p>	High	Partially Accept	<p>a) SPA Records Manager to review storage, programme currently underway with PSoS to review storage &amp; try &amp; centralise</p> <p>b) The door of the complaints office is locked whilst unattended as such its felt that there is no need to further secure the keys</p>	Mar-19	RM	A review, consolidation and weeding exercise is currently underway with legacy files, when this is complete a new storage contract will be issued and relevant inspections undertaken. New date estimated as April 2020. 04/20 Project was on target but now delayed due to Covid as on-site visits required for tenders. Sept 20 - No further update.	

Ref	Non-conformity	Recommendation	Priority	Accepted / Partially Accepted / Rejected	Agreed Action	Implementation Date	Owner	Update at 18 months	Action Status
A28	<p>a) Purchases of IT related services and supplies with values below the public procurement threshold are not subject to formal contracts.</p> <p>b) SPA has no contract in place with PSoS who provide all SPA IT and Procurement services.</p>	<p>a) Whilst the public procurement thresholds may serve as a guide for whether a contract (including information security requirements) is required, there must be a process of consideration. SPA may find that in some circumstances, low value purchases will still have high risk factors and thus should be protected by contracts.</p> <p>b) SPA must address the lack of contract with PSoS, as the lack of contract provides no assurances that the services provided will continue to take place or the quality they will be provided at.</p>	Urgent	Accept	Head of IM/SIRO to engage with PSoS Im and Procurement	Feb-19	SIRO/Procurement/Head of IM	Text updated by Dir of Governance and Assurance Sept 19: This has been subject to an internal audit report by Scott Moncrieff. Will require resource for ongoing audit. Head of IM now managing this action. Options paper to be prepared for consideration Jan 2020. Paper delivered Jan 2020. 04/20 Meeting has taken place between relevant stakeholders in SPA and PSoS and a 4 point action plan was agreed to move the recommendations forward. First review due end June 2020. Review not yet undertaken, however, there is evidence from reporting that the processes put in place are working, as such status changed to partially complete. There has been no further progress in terms of the S84 service back agreement	
A29	<p>a) Risk ID004 states that security clauses are not in place for all 3rd party contracts.</p> <p>b) SPA has no Service Level Agreements (SLA) in place with the PSoS IT Team.</p>	<p>a) The Risk Register shows that there is a plan in place to remedy this, with a scheduled completion by the end of the Calendar year. SPA should monitor this to ensure that completion is achieved.</p> <p>b) As the PSoS IT Team are the provider of all IT services for SPA, it is important that SPA obtain a SLA with regards to response times and communication levels.</p>	Urgent	Accept	A dual branded security aspects letter has been produced and has been issued with contracts, however, IM was advised to cease all other work on the risk of 'contracts' in June 2019	Mar-19	SIRO/Head of Legal/Head of IM	Security aspects letter in place. SLA's/S84 agreement not yet in place for IT services.	
A30	There is no review, monitoring, or auditing of existing contracts with regards to their security arrangements.	SPA have identified that this will be part of the role of new Auditor, and will take place after that role is filled. SPA should ensure that contract reviews and audits are built into the SPA Internal Audit Schedule.	Medium	Accept	IM advised to cease all work in this area June 19	Jun-19	Head of IM	See A28. It is the role of Contracts managers to monitor existing contracts. Where SPA has a contracts manager they will be trained in this respect. Evidence will be sought from PSoS contract managers in terms of compliance. 06/20 Evidence requested for one contract as a dip sample, however, this would be an audit role as per the request for additional resources in IM. Sept 20, Audit officer role in new structure, however unclear how much of this resource IM will have as it doesn't sit under IM. Counter proposal submitted for post to sit under IM. Sept 20, Audit officer role in new structure, however unclear how much of this resource IM will have as it doesn't sit under IM. Counter proposal submitted for post to sit under IM	
A31	The Forensic Services Incident Handling Process is centred on their ISO 17025 Management System, and treats the SPA Incident Management process as secondary.	SPA must ensure that they have a unified approach to incident management across the whole organisation which takes primacy over any processes used by individual teams or departments.	High	Accept	Staff will be reminded that IM process has primacy	Feb-19	SIRO/Head IM	FS reminded that SPA IM has primacy for security incidents, however, risk on non-compliance continues. June 2020 Update - There has been significant progress in reporting of incidents, however, there is still some late reporting. Sep 20; consistency in reporting gives assurance that this action can be closed.	
A34	<p>a) The Incident Management Policy only specifies the reporting of incidents, and does not mention Near Misses. Further to this, evidence was seen of a near miss/incident relating to a supplier data breach (Gilson) which is not listed on the Incident Log.</p> <p>b) The Forensic Services Incident Log is a blank template which shows its date of creation as the 21st of December 2018. There is no indication from the evidence seen that Forensic Services are tracking incidents as was described in interviews with members of staff.</p>	<p>a) SPA should ensure that the Incident Management Policy reflects the requirement to track Near Misses, and should further take steps to ensure staff are made aware of this fact.</p> <p>b) SPA should review to what extent Forensic Services are carrying out incident logging, and ensure that it matches the standard to which SPA operates their own Incident Log.</p>	Medium	Accept	SPA Corporate response: Policy will be updated to specify near misses should be recorded. The failure to record the Gilson incident was an oversight. Forensics Response: Forensics will ensure they record in line with corporate	Apr-20	Head IM	Processes updated, but reporting incomplete. Head of IM to consider the benefits of SPA Corporate taking Q Pulse, thus ensuring logging of policies and staff reading them is recorded and central recording of all incidents. Initial meeting with Q pulse undertaken. 04/20 Meeting was due March but cancelled due to Covid. As operational landscape needs to be reviewed in terms of IT its unlikely this action will progress until staff return to work. 06/20 No change. 09/20 no change	

Ref	Non-conformity	Recommendation	Priority	Accepted / Partially Accepted / Rejected	Agreed Action	Implementation Date	Owner	Update at 18 months	Action Status
A35	Whilst processes are in place to ensure that incidents are escalated internally, the current set up of Forensic Services relying on their ISO 17025 processes means that incidents initially reported to Forensic Services will be delayed in their internal escalation.	SPA should investigate ways to link the reporting chains for Forensic Services Incident Management and SPA Incident Management, so that incidents reported in Forensic Services are automatically forwarded to SPA.	High		Will investigate how we could automate this	Mar-19	Head IM	Consideration is being given to changing the FS system to trigger reporting to SPA Im and a change request has been raised. A manual process for notification and pwards reportinghas been agreed	
A38	SPA have not been carrying out a programme of internal audits of their information security.	SPA should ensure that, after filling their vacancy for an Auditor, their Internal Audit Plan includes reviews of the information security management system. This should include reviews of the IT Health Checks currently being carried out, and also of the Technical Audits done by PSoS IT.	Medium	Accept	Ensure resources are allocated for this			Sept 20, Audit officer role in new structure, however unclear how much of this resource IM will have as it doesnt sit under IM. Counter proposal submitted for post to sit under IM	
A39	Outside of the Forensic Services ISO 17025 requirements, there is no formalised approach to management led compliance reviews such as spot checks.	SPA should consider building into the Information Security Policy a requirement for management led compliance reviews, such as spot checks and staff surveys.	Medium	Accept	This would form part of the duties of an internal auditor post, although its not felt necessary to put info about spot checks in policy as this is covered in training			see above	
B1	SPA's Data Sharing Standard Operating Procedures (SOPs) state that sharing decisions should be recorded in an auditable format; however, it was not clear if this was being monitored.	SPA should implement monitoring processes to ensure that the Data Sharing SOPs are being adhered to in relation to audit trails being maintained.	Low	Accept	Audit plans should be put in place by auditor	Jun-19	Head of IM	Sept 20, Audit officer role in new structure, however unclear how much of this resource IM will have as it doesnt sit under IM. Counter proposal submitted for post to sit under IM	
B2	SPA do not undertake training needs analysis to identify roles that would benefit from specific training in relation to data sharing.	SPA should undertake a training needs analysis to identify roles that involve the sharing of data or involvement in ad hoc disclosures and consider what additional training may be required. Consideration should also be given to how regularly such training will need to be refreshed.	Medium	Accept	Already identified as an issue and an HR resource allocated to look at this after re-structure	Jul-19	HR	Re-structure on hold and as such action not progressed. Jan 2020, meeting with HR to plan progression of this action and incorporate in planning for SPA 2020.	
B14	The Forensic Services Quality Team has undertaken an audit of the Defence Access process; however there was no evidence of similar quality checks or monitoring of disclosures carried out in other areas.	Regular audits or spot checks should be undertaken to provide SPA with assurance that disclosures are being made appropriately and in line with agreed policies and procedures.	Medium	Accept	Audit process to be put in place for non Defence Access disclosures	Mar-18	Head of IM	Review process for image disclosure put in place. Do not have resources to cover a full audit programme. Sept 20, Audit officer role in new structure, however unclear how much of this resource IM will have as it doesnt sit under IM. Counter proposal submitted for post to sit under IM	
C2	The information security e-learning for staff working in forensics is out of date and refers to the DPA 1998. The IMT are currently updating the content to include GDPR/DPA18 requirements. It was also reported that forensics' staff required more detailed records management training and it had already been identified that the e-learning content was not sufficient.	The information security e-learning completed by forensics' staff should be updated to reflect current data protection legislative requirements. SPA should also review and improve the records management training for forensics' staff to ensure that they are aware of their records management responsibilities.	High	Accept	Work in hand	Mar-19	Head of IM	The training has been updated and awaits a launch date, reliant on PSoS. Jan 2020 raised with HR that PSoS Moodle unit has not provided a launch date. 04/20 Moodle advised that all work is currently on hold. Head of IM to explore alternatives (NPCC, NRS etc)	
C3	The forensics department have an existing Training Needs Analysis (TNA) process that includes IG training needs but it was reported that the TNA for SPA corporate staff is a work in progress. A new HR & Organisational Development Officer was appointed in October 2018 to develop the TNA.	a) SPA should ensure that training needs for all staff across the organisation are regularly assessed and identified. This will help them to identify any gaps in knowledge that can be addressed in their IG training programme. b) Staff responsibilities for the TNA process should be documented in relevant job descriptions.	High	Accept	Consider how to improve capture of requirements	Mar-19	HR	SPA does not have any employee with this responsibility in their Job Description. Requirement fed in to SPA 2020	



Ref	Non-conformity	Recommendation	Priority	Accepted / Partially Accepted / Rejected	Agreed Action	Implementation Date	Owner	Update at 18 months	Action Status
C4	SPA do not have an IG training strategy or plan in place at present but plan to introduce one once the TNA has been completed.	SPA should ensure that a training plan or strategy is in place to ensure that training needs identified in the TNA process are addressed. The plan should document agreed timescales for delivery and responsibilities should be documented in the ToR of relevant steering groups and job descriptions.	High	Accept		Ongoing	Line Managers /IGF	See above	
C7	The induction training programme for forensics staff includes the same Moodle modules as the overall training programme. As already mentioned, the information security e-learning Moodle is out of date and it was also reported that the records management training content for forensics is insufficient.	SPA should ensure that all elements of the induction training for forensics are up to date and contain sufficient guidance. The records management content of the induction programme for forensics should be improved.	Medium	Accept	Work in hand. All staff were given RM training in 2018, however, this identified a lack of basic IT skills which staff seem to have associated with RM. IM have committed to develop training in basics such as keyboard shortcuts etc. as many of the reasons given for poor records management were that staff did not know how to move files or hyperlink etc.	Jun-19	Head of IM	Induction training provided to all staff with separate records management element.	
C8	The induction training provided to SPA corporate staff does not include an assessment or test to provide assurance that the content has been understood. It is however delivered in face to face format with an opportunity for participants to ask questions before access to systems is granted. Forensics have a test as part of the information security Moodle that staff complete. It is recommended that this is completed within the first two weeks of employment but this is not a requirement before access is granted.	a) SPA should ensure that data protection/information security induction training includes an assessment or test with a minimum pass rate (e.g. 80%) to ensure new staff are aware of and understand their responsibilities with respect to the handling of personal data. b) It should be mandatory for all staff to complete their induction as soon as possible, ideally before access is granted to systems processing personal data.	Medium	Accept	Work in hand	Mar-19	Head of IM	Face to face induction is done for new starts before system access is permitted. Testing is on the Moodle training and the new version that has been developed also has testing. Updated training module sent to PSoS Moodle team, awaiting a launch date. 04/20 Moodle advised that all work is currently on hold. Head of IM to explore alternatives post lockdown (NPCC, NRS etc).	
C9	Induction training is mandatory for all staff including temporary and individual contractors. This is not the case for staff providing security and cleaning services via a third party provider. Procurement of contracts for these services is done by PSoS in SPA's name as PSoS cannot legally enter into contracts. There is no requirement for the staff of these providers to undergo any induction training with respect to their responsibilities when handling personal data.	SPA should review contracts to ensure that they include the requirement for all staff employed by third parties to undergo data protection training appropriate to their role. Alternatively they may wish to include the staff who deliver these services at SPA buildings in their training needs analysis and provide them with induction training.	High	Partially Accept	This would be relevant where they had access to personal data and contractors are treated in an identical manner to staff in this respect. However the cleaning and security staff do not have access to any SPA data beyond knowing the names of staff.			SPA does not have oversight of the contracts process to ensure the relevant training is specified where appropriate. As such this action cannot be completed other than gaining an assurance from PSoS. We would need to audit to verify. head of IM to provide an options paper re all procurement issues Jan 2020, however, it should be re-iterated that this action was primarily re cleaning and security staff and they have no system access so this part of the recommendation was not accepted. Any contractor coming into use SPA computers will be inducted. 04/20 Meeting with relevant stakeholders has taken place and consideration will be given to a) how to remind the business owners that this is their responsibility and b) audit to ensure its happening. Review date end June 2020. 06/20 work underway to ensure relevant training has been undertaken. 09/20 PSoS chased up as no response received re training of contractors	
C12	SPA plan to deliver refresher training to all staff on an annual basis. However the lack of a training strategy/plan and formal TNA means that ICO auditors were unable to gain assurance of how appropriate refresher training would be delivered to all grades. Additionally, there is currently no requirement for staff employed by third party providers to undergo refresher data protection training appropriate to their role.	SPA should complete their TNA and training strategy/plan for next year to ensure that all staff including senior managers, forensics and those employed by third party providers receive appropriate refresher training.	Medium	Accept	Only where third party providers have data access	Aug-18	HR	TNA not yet complete as re-structure put on hold and no resources with this function in job description. Meeting with HR Jan 2020, work will begin to factor this in to SPA 2020	

Ref	Non-conformity	Recommendation	Priority	Accepted / Partially Accepted / Rejected	Agreed Action	Implementation Date	Owner	Update at 18 months	Action Status
C17	Although informal follow up processes are in place these are not documented in any policy, procedure or relevant job description. Additionally, the IMT do not have the access rights to update all staff training records on SCOPE which causes problems with recording/monitoring training completion.	SPA should ensure that follow up responsibilities are documented in relevant policies, procedures and job descriptions, including those of the IMS/DPO, Line Managers and Operations Managers. To simplify the follow up process, the IMT should have appropriate access to staff training records.	High					Responsibilities documented in policy/procedures. Scope is not set up in a way that allows for this access at this time, so consideration is being given to how this could be met. New job descriptions will be produced for new structure as part of SPA 2020	
C19	It was reported that the target for training completion was 100% allowing for long term absence however email evidence has been provided suggesting this is 90%.	SPA should consider setting KPIs or targets for training completion and documenting this in their training strategy or plan. This will assist in ensuring the effective monitoring of completion of training by staff across all departments.	Low	Accept	As above	Aug-19	Head of IM	Current rate is 95.6, balance due to staff absence. Do not have a training plan or kpi's, will be factored in for SPA 2020	
C21	The monitoring of training completion as part of SPA's appraisal process was reported to be inconsistent, mainly due to changes of role and lack of resources.	SPA should integrate individual's data protection related training objectives into the annual appraisal process and appraisal forms used should record completion of IG/data protection training to provide assurance of completion.	Medium	Partially Accept	SPA does not have an 'appraisal process'. SPA has a 'personal development programme'. SPA is very clear about the purpose of PDP's - they are all about staff and their development - looking forward. Managers should not wait until this meeting to highlight issues. However, the training can form part of the list of annual requirements and give staff the opportunity to discuss the training and provide feedback. Will need to go through agreement process	Aug-19	Head of IM	Needs to be agreed by HR going forward, HR considering how this may be achieved Jan 2020. 06/20 Will form part of OD	
C23	Q pulse is used in the forensics department to monitor the fact that staff have read and understood policies and other documents. There are plans to introduce Q Pulse for SPA corporate staff but at the time of the audit this was not yet in place.	SPA should implement a process to provide assurance that all staff have read and understood the IG policies in place, including any updates.	Medium	Accept	Looking at options to manage this	May-19	Head of IM	Still looking at a process to manage this in SPA corporate, however, as the vast majority of staff handling personal data are in FS, the Q pulse system ensures this requirement is delivered in their business area. Head of IM met with Q pulse Dec 19 and consideration will be given to implementing new version of Q pulse in SPA corporate in April 2020 to address this and other recommendations. 04/20 meeting delayed due to Covid. 06/20 No further update	

Ref	Non-conformity	Recommendation	Priority	Accepted / Partially Accepted / Rejected	Agreed Action	Implementation Date	Owner	Update at 18 months	Action Status
-----	----------------	----------------	----------	--	---------------	---------------------	-------	---------------------	---------------

Not complete

Partially complete

Complete

**Urgent Priority Recommendations -**  
 These recommendations are intended to address risks which represent clear and immediate risks to the data controller's ability to comply with the requirements of data protection legislation.

**High Priority Recommendations -**  
 These recommendations address risks which should be tackled at the earliest opportunity to mitigate the chances of a breach of data protection legislation.

**Medium Priority Recommendations -**  
 These recommendations address medium level risks which can be tackled over a longer timeframe or where some mitigating controls are already in place, but could be enhanced.

**Low Priority Recommendations -**  
 These recommendations represent enhancements to existing controls to ensure low level risks are fully mitigated or where we are recommending that the data controller sees existing plans through to completion.

APPENDIX C

Update on Progress to Address Recommendations from HMICS Thematic Inspection of the Scottish Police Authority Published Sept 19

No	Recommendation and Action	Progress Against Action – Jan 20	Progress Against Action – April 20	Progress Against Action – June 20	Progress Against Action- Aug 20	Owner/ Lead	Target date
1	<p><b>Recommendation</b> The Scottish Police Authority Chief Executive should lead and expedite the implementation of a new Scottish Police Authority corporate structure and ensure an appropriate focus on existing staff wellbeing.</p> <p><b>Action</b> SPA will produce a revised structure and Reorganisation Plan, Corporate Strategy which will include a strategic narrative and an Annual Business Plan supporting the Strategic Plan facilitating alignment of team and individual performance objectives.</p>	<p>SPA are currently undergoing a review of the structure for SPA Corporate taking cognisance of the requirements to support the Board and Committees, the responsibilities of SPA under the act, statutory responsibilities as a public body and resources required to support the role of Accountable Officer. Development includes significant engagement with staff on an individual, team and organisational level. Many of the staff are inputting to the review.</p> <p>An SPA Corporate Strategy is currently under development (Jan 20) covering the period 2020 to 2023. It will be presented to the SPA Board for approval Feb 2020.</p> <p>An Annual Business Plan for 2020/21 will be developed to include both improvement and business as usual activities.</p> <p>Staff engagement sessions on the development of the organisation structure have taken place on 14/8/19, 17/9/19, 3/12/19, 12/12/19, and are scheduled for 14/1/20, 11/2/20, 18/3/20, 21/4/20,26/5/20</p>	<p>Review of structure continues to be progressed despite staff working remotely from home.</p> <p>An update on the proposed organisational design will be given to Members at the seminar on 30 April. This will also include a proposed structure diagram. The intention is that further more detailed information in the form of a business case will be presented to the 20 May Board meeting for approval.</p> <p>SPA Corporate Plan 2020-23 was approved by the SPA Board</p> <p>SPA Annual Business Plan scheduled to be presented to the SPA Board May 20</p> <p>Regular staff engagement ongoing including updates from Interim CEO on weekly staff conference call</p>	<p>Organisational Development progressing:- Full structure agreed by Board in May 2020. Implementation of high level structure endorsed by the trade unions and formal consultation with affected staff underway. Ongoing informal engagement with all staff, prior to planned formal engagement. Ongoing informal engagement of full structure proposals with trade unions - to be presented to JNCC on 9 July</p> <p>See above</p>	<p>Full organisational re-design and new structure received full support from the JNCC on 9 July and triggered the start of formal consultation with staff. Group consultation was held on 14 July followed by individual consultations completed by 3 August. As part of group and individual consultation, staff can submit counter proposals on the full structure and/or individual circumstances. Any counter proposals will be fully considered as part of the consultation process and feedback provided. A progress update will be provided to the JNCC in September 2020.</p>	<p>CEO and Directors</p> <p>CEO and Directors</p>	<p>Oct 2020</p> <p>Complete</p> <p>Complete</p> <p>Ongoing</p>

**OFFICIAL**

No	Recommendation and Action	Progress Against Action – Jan 20	Progress Against Action – April 20	Progress Against Action – June 20	Progress Against Action- Aug 20	Owner/ Lead	Target date
2	<p><b>Recommendation</b> The Scottish Government should clarify in what respects the Scottish Police Authority differs from other public bodies and specify the implications for the system of governance for policing.</p> <p><b>Action</b> SPA CEO and Vice Chair will liaise with SG colleagues to inform revised SG Governance and Accountability Framework and ensure SPA Corporate Strategy and SPA Governance Framework are aligned to SG Framework.</p>	<p>SG have indicated intention to discuss with the relevant bodies roles and responsibilities within governance of policing</p>	<p>Vice Chair participated in round table event on 11<sup>th</sup> March chaired by the Cab Sec for Justice. Details of further engagement to be confirmed.</p> <p>Extract from Vice Chair’s report to March Authority Meeting: - <i>In summary, the Authority will welcome a system-wide review and contribute to it positively and openly. But its scope, intent and method must be well defined and must not prevent the Authority and its partners in the system from meeting their current responsibilities.</i></p>	<p>Internal work within SPA to assess options for strengthening and clarifying role of SPA and others within overall system to be developed. Once concluded, this will provide contribution to future roundtable work</p>	<p>No change since June update</p>	<p>Vice Chair and CEO</p>	<p>SG to confirm</p>
3	<p><b>Recommendation</b> The Scottish Government and the Scottish Police Authority should undertake an immediate review of the roles of the Chair and Board members in executive work, in line with principles of good governance, empowering the Scottish Police Authority executive team to assume operational management of the organisation.</p> <p><b>Action</b> SPA CEO and Vice Chair will lead work to ensure SPA Corporate Strategy and SPA Governance Framework are aligned to the 2012 Act and On Board best practice.</p>	<p>SG proposing to seek light-touch independent advice to provide Scottish Government with independent assurance/advice around the legitimate scope/time commitment on the part of the Chair and Board members (as part of the process of addressing HMICS Recommendation 3, along with the review of the Governance and Accountability Framework) and help inform preparation for appointment of the new Chair and Board members</p> <p>Organisation development includes consideration of the capacity/capability of the SPA to deliver all the functions of the authority while providing the necessary support to the Chair and Board members in their non-executive capacity</p>	<p>The Scottish Government has commissioned former Auditor General, Robert Black, to undertake a review SPA Members’ role, responsibilities and time commitment. This review is currently in progress with Mr Black having had telephone interviews with all Members, Vice Chair, a number of SPA officers and other key stakeholders.</p> <p>Work to ensure sufficient capacity and capability is central to the ongoing work on organisational development.</p>	<p>Publication of report by Robert Black awaited.</p>	<p>Robert Black report published 7<sup>th</sup> of August</p> <p>See update for recommendation 1</p>	<p>Vice Chair and CEO</p> <p>Vice Chair and CEO</p>	<p>Complete</p> <p>Oct 20</p>

**OFFICIAL**

No	Recommendation and Action	Progress Against Action – Jan 20	Progress Against Action – April 20	Progress Against Action – June 20	Progress Against Action- Aug 20	Owner/ Lead	Target date
4	<p><b>Recommendation</b> The Scottish Government, the Scottish Police Authority and Police Scotland should develop a clear system of engagement and governance for reserved policing matters</p> <p><b>Action</b> SPA CEO and Vice Chair will liaise with SG colleagues to inform revised SG Governance and Accountability Framework and ensure SPA Corporate Strategy and SPA Governance Framework are aligned to SG Framework.</p>	<p>The review and refresh of the Governance and Accountability Framework and the strategic narrative included within the Corporate Strategy will support addressing this recommendation. Clarification of roles and responsibilities in relation to policing oversight led by Scottish Government would inform a strategic direction for options available to discharge the recommendation.</p>	<p>Ownership of the Governance and Accountability Framework rests with Scottish Government. SPA have and are continuing to provide input to the revisions and monitoring this through the Governance Development and Improvement Group which includes a representative from SG Sponsorship Team.</p>	<p>Engagement continues between SPA and Scottish Government to develop the Governance and Accountability Framework</p>	<p>No change since June update</p>	<p>CEO and Directors</p>	<p>SG to confirm</p>
5	<p><b>Recommendation</b> The Scottish Police Authority should proceed to formally co-opt COSLA to their Board and appropriate Sub-Committees in order to enhance the link between local and national policing.</p> <p><b>Action</b> SPA CEO will liaise with COSLA colleagues to take forward the option of COSLA representation on the SPA Policing Performance Committee.</p>	<p>SPA Vice Chair engaging with COSLA. COSLA would welcome cop-option of a representative of COSLA to the Policing Performance Committee.</p> <p>Legislation does not facilitate co-opting onto the SPA Board</p>	<p>A CoSLA representative was invited to participate in meetings of the Policing Performance Committee. This is not a co-option, as such, given the nature of our relationship with CoSLA. The role and expectations were, however, clearly documented and agreed between the Vice Chair and CoSLA's President, Cllr Evison in January 2020. The Vice Chair also advised HMICS who supported this approach. Cllr Parry has since been nominated to represent CoSLA on the PPC.</p>	<p>Arrangement in place whereby Cllr Kelly Parry has been nominated by CoSLA to participate in Policing Performance Committee meetings.</p> <p>Further consideration required and engagement with HMICS on fully discharging the recommendation</p>	<p>No change since June update</p>	<p>Vice Chair</p>	<p>Complete</p>

**OFFICIAL**

No	Recommendation and Action	Progress Against Action – Jan 20	Progress Against Action – April 20	Progress Against Action – June 20	Progress Against Action- Aug 20	Owner/ Lead	Target date
6	<p><b>Recommendation</b> The Scottish Government, the Scottish Police Authority and Police Scotland should review the designation of Accountable Officer(s) within policing.</p> <p><b>Action</b> SPA CEO and Vice Chair will liaise with SG colleagues to consider options to review the role and designation of the Accountable Officer.</p>	<p>The role of accountable officer is outlined in legislation. SPA are fully supportive of reviewing the role and designation of the Accountable Officer and will engage with SG to ascertain parameters for options to be considered.</p> <p>Organisation Development includes consideration of the requirements to support the role of Accountable Officer as CEO for SPA</p>	<p>The role of accountable officer is outlined in legislation. SPA are fully supportive of reviewing the role and designation of the Accountable Officer and will engage with SG to ascertain parameters for options to be considered.</p> <p>Organisation Development includes consideration of the requirements to support the role of Accountable Officer as CEO for SPA</p>	No change since April update	<p>Robert Black report published 7<sup>th</sup> of August includes consideration of the role of accountable officer</p> <p>See update for recommendation 1</p>	<p>Vice Chair and CEO</p> <p>CEO and Directors</p>	<p><del>SG to confirm</del> Complete</p> <p>Oct 20</p>
7	<p><b>Recommendation</b> The Scottish Police Authority should implement effective engagement and feedback mechanisms with staff associations and unions as part of a wider stakeholder engagement and consultation approach.</p> <p><b>Action</b> SPA will produce an Annual Business Plan, which will include amongst its objectives effective communication and engagement across a wide range of internal and external stakeholders.</p>	<p>A paper is being developed with options in order facilitate improvements to workforce governance through effective communication, consultation and engagement mechanisms with trade unions and statutory staff associations.</p> <p>This proposal is in development and requires engagement with Board Members, however focuses on recognising current stakeholder views, On-Board Guidance responsibilities and principles outlined in the Working Together Review: Progressive Workforce Policies in Scotland (Scottish Government Commissioned independent review). Early benchmarking has included consideration of the NHS Staff Governance approach.</p>	<p>This proposal will benefit from the creation of a new committee that focuses on workforce governance and work is progressing to ensure that both the development of the committee and the stakeholder engagement proposal are fully aligned to ensure effective implementation and oversight.</p>	<p>A terms of reference was drafted and presented at the February meeting of the Partnership Forum. Participants were invited to provide comments with a view to confirming the terms of reference at the next meeting - due to take place shortly.</p> <p>In addition, draft terms of reference are being developed for a new Workforce Governance committee which will improve the oversight and scrutiny of strategic workforce related matters. This will be the SPA's formal forum for engagement and consultation with staff associations as distinct from the Partnership Forum.</p>	<p>A discussion paper with draft proposals has been shared with the Interim Chair and Chief Executive with this being discussed on 7 September 2020. The aim is for a rounded discussion to take place at the SPA Member's Seminar on 7 October with a focus on proposed approaches to future engagement with unions and staff associations. This will include consideration of the Partnership Forum (already in place) and the newly proposed Workforce Governance Committee.</p>	<p>CEO and Directors</p>	<p><del>June 20</del> (TBC)</p>

**OFFICIAL**

No	Recommendation and Action	Progress Against Action – Jan 20	Progress Against Action – April 20	Progress Against Action – June 20	Progress Against Action- Aug 20	Owner/ Lead	Target date
8	<p><b>Recommendation</b> The Scottish Police Authority executive team should develop proposals for effective governance of change and transformation, bringing forward proposals as a matter of urgency.</p> <p><b>Action</b> A comprehensive review of the SPA approach to the system wide oversight of change will inform a proposal to the SPA Board in February 2020.</p>	<p>Proposal to the SPA Board in February 2020.</p>	<p>Methodology for oversight of change approved at the February Authority meeting</p>	<p>HIMCS confirmed recommendation closed</p>		<p>Vice Chair</p>	<p>Closed</p>
9	<p><b>Recommendation</b> The Scottish Police Authority executive team should develop and secure approval from the Board for a new corporate plan.</p> <p><b>Action</b> See action 1. SPA will produce a revised structure and Reorganisation Plan, Corporate Strategy which will include a strategic narrative and an Annual Business Plan supporting the Corporate Strategy facilitating alignment of team and individual performance objectives.</p>	<p>An SPA Corporate Strategy is currently under development (Jan 20) covering the period 2020 to 2023. It will be presented to the SPA Board for approval Feb 2020.</p> <p>An Annual Business Plan for 2020/21 will be developed to include both improvement and business as usual activities.</p> <p>Staff engagement sessions on the development of the organisation structure have taken place on 14/8/19, 17/9/19, 3/12/19, 12/12/19, and are scheduled for 14/1/20, 11/2/20, 18/3/20, 21/4/20,26/5/20</p>	<p>SPA Corporate Plan 2020-23 was approved by the SPA Board</p> <p>SPA Annual Business Plan scheduled to be presented to the SPA Board May 20</p> <p>Regular staff engagement ongoing including updates from Interim CEO on weekly staff conference call</p>	<p>HMICS confirmed recommendation closed</p>		<p>CEO and Directors</p> <p>CEO and Directors</p>	<p>Closed</p>



**OFFICIAL**

No	Recommendation and Action	Progress Against Action – Jan 20	Progress Against Action – April 20	Progress Against Action – June 20	Progress Against Action- Aug 20	Owner/ Lead	Target date
10	<p><b>Recommendation</b> The Scottish Police Authority should further develop its self-assessment and performance monitoring approach to include examples and measures of the Scottish Police Authority's own impact on continuous improvement.</p> <p><b>Action</b> SPA will produce a revised structure and Reorganisation Plan, Corporate Strategy which will include a strategic narrative and an Annual Business Plan supporting the Corporate Strategy facilitating alignment of team and individual performance objectives.</p>	<p>SPA will develop an Annual Business Plan including both improvements and business as usual objectives. A performance framework will be developed to facilitate tracking and reporting against the objectives within the Annual Business Plan.</p> <p>SPA will implement a self-assessment methodology with the first iteration to be completed by April 21. Thereafter regular re-assessment scheduled and plans to address identified improvements.</p>	<p>SPA Annual Business Plan scheduled to be presented to the SPA Board May 20</p> <p>Self-assessment will be completed after implementation of organisational development</p>	<p>Annual Business Plan approved by SPA Board May 20</p> <p>No change since April update</p>	<p>No change</p>	<p>CEO and Directors</p> <p>CEO and Directors</p>	<p>Complete</p> <p>April 21</p>

**OFFICIAL**

No	Recommendation and Action	Progress Against Action – Jan 20	Progress Against Action – April 20	Progress Against Action – June 20	Progress Against Action- Aug 20	Owner/ Lead	Target date
11	<p><b>Recommendation</b> The Scottish Police Authority requires to set out in detail how it will exercise its duty to hold the Chief Constable to account through its system of governance.</p> <p><b>Action</b> SPA will produce a Corporate Strategy which will include a strategic narrative</p> <p>Feedback received from HMICS on evidence required to discharge recommendation taking cognisance of a number of inputs. Further consideration on structure to discharge action required</p>	<p>SPA have developed an Excellence Framework (to be presented to the Audit Committee on 30<sup>th</sup> January for approval ) which provides a conceptual structure intended to serve as a guide for the building, and ongoing development, of a Scrutiny and Assurance Programme to deliver excellence within SPA, and derive assurance around excellence within Scottish policing.</p> <p>SPA approach to the system wide oversight of change to the SPA Board in February 2020.</p>	<p>SPA Excellence Framework approved at February Authority Meeting</p> <p>Methodology for oversight of change approved at the February Authority meeting</p>	<p>The PS performance framework has been revised under direction and support from Members of the SPP and SPA officers (to be approved at Board 30/6) and now includes an agreed regular suite of measures of progress that will provide evidence to enable the Board to hold the Chief Constable to account for the policing of Scotland. Collaborative development of the framework is an objective in the SPA Business Plan for 2020/21, derived from strategic outcomes within the SPA Corporate Plan. Central to this objective is a clear path for improvement of data and reporting as quarterly public performance reporting continues during 20/21. There will also be additional 6-monthly reporting by Police Scotland on all commitments and priorities within the Annual Police Plan</p>	<p>The revised performance framework was approved by the Board in June 2020. It includes a suite of fixed measures of progress towards each of the five strategic outcomes, agreed through collaboration between SPA and Police Scotland. These measures form the basis of Police Scotland's quarterly performance reports and are supplemented by additional information and context where appropriate. Having a fixed set of measures of progress, reported on every quarter will provide a consistent picture of performance to facilitate more meaningful trend analysis and benchmarking opportunities for Committee members to scrutinise. The first quarterly report for Q1 20/21 will be scrutinised by the Policing Performance Committee on 26 August.</p>	<p>CEO and Directors</p> <p>Vice Chair</p>	<p>Complete</p> <p>Complete</p>

**OFFICIAL**

No	Recommendation and Action	Progress Against Action – Jan 20	Progress Against Action – April 20	Progress Against Action – June 20	Progress Against Action- Aug 20	Owner/ Lead	Target date
12	<p><b>Recommendation</b> The Scottish Police Authority and Police Scotland should develop a forward planning system of proactive risk awareness and post-implementation scrutiny for policing policy changes which are likely to have an impact on public confidence.</p> <p><b>Action</b> SPA will produce an Annual Business Plan, which will include amongst its objectives effective horizon scanning of the public sector, public interest, political and legislative environment, to provide early indication of issues of importance and relevance to the SPA's role</p>		<p>An Annual Business Plan for 2020/21 will be developed to include both improvement and business as usual activities.</p> <p>SPA approach to the system wide oversight of change to the SPA Board in February 2020.</p> <p>Excellence Framework to be presented to the Audit Committee on 30<sup>th</sup> January for approval</p> <p>Policing Performance Committee extract of terms of Reference :- <i>Consider significant proposed changes, in consultation with The Chair or at the request of The Board, to operational policing and ensure that the associated risks and opportunities have been fully assessed</i></p> <p>Strategic Risk Register in development – to be presented to the Audit Committee Jan 20 and Board Feb 20</p> <p>Biometrics Commissioner code of practice – future developments to be implemented in line with code of practice</p>	<p>SPA Annual Business Plan scheduled to be presented to the SPA Board May 20</p> <p>Methodology for oversight of change approved at the February Authority meeting</p> <p>SPA Excellence Framework approved at February Authority Meeting</p> <p>Strategic Risk Register approved by SPA Board Feb 20</p> <p>Strategic Co-ordination Unit, prior to coronavirus, had opened engagement with PS colleagues to consider the options for SPA to utilise the scanning work completed by PS to support the discharge of this recommendation. This requires further consideration.</p>	<p>No change</p> <p>No change</p> <p>No change</p>	<p>CEO and Directors</p> <p>Vice Chair</p> <p>CEO and Directors</p> <p>CEO and Directors</p> <p>CEO and Directors</p> <p>CEO &amp; SCU</p>	<p>Complete</p> <p>Complete</p> <p>Complete</p> <p>Ongoing</p> <p>Complete</p> <p>Ongoing</p> <p>TBC</p>

No	Recommendation and Action	Progress Against Action – Jan 20	Progress Against Action – April 20	Progress Against Action – June 20	Progress Against Action- Aug 20	Owner/ Lead	Target date
13	<p><b>Recommendation</b> The Scottish Police Authority should review the role of the Forensics Committee to work effectively with other Scottish Police Authority Committees and review the optimum governance and delivery options for Forensic Services.</p> <p><b>Action</b> SPA will produce a Corporate Strategy which will include a strategic narrative, and revised Corporate Governance Framework which will include a review of all committees and other governance and oversight mechanisms.</p>	<p>The SPA Corporate Organisational Development work includes consideration of how SPA Corporate staff will supports F/S. In parallel the FS Operating Model work is also ongoing. These pieces of work will bring clarity on roles/responsibilities between SPA Corporate and SPA F/S in respect to input at SPA Committees. Currently F/S do not have sufficient resources to input and present at all committees.</p> <p>Review and update of the SPA Corporate Governance Framework aligned to the review/update of the Governance and Accountability Framework</p>	<p>The organisational development work has considered how the interconnectivity between FS and SPA Corporate could develop in future. The output of this will be reflected in the roles that are developed within SPA Corporate.</p> <p>The Vice Chair has reinstated the Governance Development and Improvement Group as the key vehicle for overseeing the development and continuous improvement of the SPA Corporate Governance Framework. The Group includes representation from SG and PS to ensure input, alignment and complementarity with other aspects of governance and accountability. The Interim Chief Executive also reviewed the previous workplan with lead officers to ensure appropriate prioritisation and resource to progress the work as quickly as possible. The current aim is to present a fully reviewed and updated version of the SPA Corporate Governance Framework to the Board in September 2020.</p>	No change since April update	<p>No change</p> <p>No change</p>	<p>CEO and Directors</p> <p>CEO and Directors</p>	<p>Oct 20</p> <p>TBC</p>

No	Recommendation and Action	Progress Against Action – Jan 20	Progress Against Action – April 20	Progress Against Action – June 20	Progress Against Action- Aug 20	Owner/ Lead	Target date
14	<p><b>Recommendation</b> The Scottish Police Authority should improve visibility of the work of the Independent Custody Visiting Scheme, direct scrutiny of custody arrangements and outcomes for detainees. It should also review the optimum governance and delivery options for the Independent Custody Visiting Scheme.</p> <p><b>Action</b> SPA will produce a Corporate Strategy which will include a strategic narrative and revised Corporate Governance Framework.</p>	<p>A paper is being drafted providing information on the delivery of Independent Custody Visiting, including where SPA has an oversight and scrutiny role of Police Scotland Custody. The report will highlight for Committee consideration where improvement to delivery of the scheme is required. To be presented to the Policing Performance Committee</p> <p>SPA, via the Planning and Performance Committee, will consider the recommendation and options to discharge</p>	<p>ICVS Suspended custody visiting in Scotland on 18 March 2020 the decision was made in the best interest of the health of visitors, detainee's, custody officers and staff. A report to the Policing Performance Committee will be drafted and submitted when there is a better understanding of the timeframe for resuming custody visiting.</p>	<p>Paper was presented to the Policing Performance Committee on 28 May providing summary information on the delivery of Independent Custody Visiting, including where SPA has an oversight and scrutiny role of Police Scotland Custody. The report also highlighted ICVS monitoring and oversight during the pandemic.</p> <p>Enhanced frequency of public facing ICVS updates via the SPA website</p> <p>Consideration of more frequent reporting into the full Board via the Chief Executives report</p> <p>Creating a key public platform for custody issues with the development and publication of the ICVS 2019-20 annual review, including its consideration through SPA governance channels.</p>	<p>As part of the CE update to the SPA Board on 19 August 2020 a paper was presented providing information on ICVS and monitoring in place during COVID 19.</p> <p>The ICVS draft annual review was presented to the Policing and Performance Committee 26 August 2020 in private for members to comment and provide feedback before publication.</p>	<p>National Custody Manager</p> <p>CE and Directors</p>	<p>TBC</p> <p>TBC</p>

APPENDIX D AUDIT SCOTLAND

Source	Report Name	Date of Report	Source Ref. No.	Recommendation	Completion Date	Context	Progress (Jan 20)	Progress (April 20)	Progress (June 20)	Progress (Aug 20)	SPA Executive Lead	RAG STATUS
Audit Scotland	2018/19 Annual Audit Report	Oct 19	5	The committee structure should be kept under review to ensure that the volume of information doesn't impact on the robustness of the scrutiny undertaken.	31/03/2020	Agreed. The Authority has already established a Governance Development and Improvement Group. The Governance Development and Improvement Group is meeting on a regular basis. It is acting as a vehicle to identify and accelerate progress on key areas for improvement. By bringing together a range of views and inputs from the Scottish Police Authority, Police Scotland and the Scottish Government, it is facilitating a 'joined up' approach to thinking and development both within the Scottish Police Authority and across the wider policing system. The group will facilitate and support further reviews of the committee structure, the scope of respective terms of reference, and also work on a revised scheme of delegation.  Implementation date: 31 March 2020	November 2019 - Corporate Governance Framework updated to reflect the new Policing Performance Committee to replace the Strategy, Policy and Performance Committee  A full review of the Corporate Governance Framework, including committee terms of reference, will be completed to ensure consistency and thereafter make changes/improvement on an ongoing basis.	The first phase has been completed with the revision of the terms of reference for the Audit, Risk and Assurance Committee (previously the Audit Committee) and implementation of the Policing Performance Committee. The second phase of committee review, including the Succession Planning and Resources committee, will be completed by Sept 20	No further update	No further update	CEO Supported by Head of Business Services	Ongoing - Timescale Revised to Sept 20
Audit Scotland	2018/19 Annual Audit Report	Oct 19	6	The Chair should engage with the Scottish Government on the time required to fulfil the role and ensure that there is no risk of the Chair and other board members operating in an executive capacity.  <i>Aligned with HMICS Rec 3. The Scottish Government and the Scottish Police Authority should undertake an immediate review of the roles of the Chair and Board members in executive work, in line with principles of good governance, empowering the Scottish Police Authority executive team to assume operational management of the organisation.</i>	31/03/2020	Partly agreed. The Scottish Police Authority has an unusually demanding and complex range of roles, responsibilities and accountabilities which are vested in the Chair and Members of the Authority. In addition, the 2018/19 year saw an exceptional and significant programme of improvement and change to the leadership and governance of both the Scottish Police Authority and Police Scotland, which was led by the Chair. The Chair and Vice Chair have already examined issues of Members' time commitments and this matter is currently under active consideration by the Scottish Police Authority's Governance Development and Improvement Group. The Scottish Police Authority would welcome further consideration with Scottish Government regarding the time commitment required for the Chair and Members to perform their roles effectively together with a review of the method of remuneration to better reflect the nature of the roles.  Implementation date: 31 December 2020	Organisation development includes consideration of the capacity/capability of the SPA to deliver all the functions of the authority while providing the necessary support to the Chair and Board members in their non-executive capacity  SG proposing to seek light-touch independent advice to provide Scottish Government with independent assurance/advice around the legitimate scope/time commitment on the part of the Chair and Board members (as part of the process of addressing HMICS Recommendation 3, along with the review of the Governance and Accountability Framework) and help inform preparation for appointment of the new Chair and Board members	The Scottish Government has commissioned former Auditor General, Robert Black, to undertake a review SPA Members' role, responsibilities and time commitment. This review is currently in progress with Mr Black having had telephone interviews with all Members, Vice Chair, a number of SPA officers and other key stakeholders.	Publication of report by Robert Black awaited.	Robert Black report published 7 <sup>th</sup> of August	CEO	Complete Aug 20
Audit Scotland	2018/19 Annual Audit Report	Oct 19	7	Detailed plans to build the capacity and capability of the Scottish Police Authority corporate function are urgently required to enable it to operate as envisaged by the legislation.  <i>Aligned with HMICS Rec 1. The Scottish Police Authority Chief Executive should lead and expedite the implementation of a new Scottish Police Authority corporate structure and ensure an appropriate focus on existing staff wellbeing.</i>	31/12/2019	Agreed. Work is being taken forward to ensure that the Scottish Police Authority has the capacity, capability, culture and structure it requires to perform effectively in future. The aim being to develop a Scottish Police Authority that is strategic, assertive, front facing and trusted by the public. This is taking a 'whole system' approach to ensure there is greater clarity going forward on the roles, responsibilities, relationships and boundaries between the various parts of the policing system. Work has begun to develop a structured process of organisational design and development, including engagement with Board members and staff to shape and inform this work with the aim of developing proposals for a refreshed organisational structure by the end of calendar year 2019.  Implementation date: 31 December 2019	SPA are currently undergoing a review of the structure for SPA Corporate taking cognisance of the requirements to support the Board and Committees, the responsibilities of SPA under the act, statutory responsibilities as a public body and resources required to support the role of Accountable Officer. Development includes significant engagement with staff on an individual, team and organisational level. Many of the staff are inputting to the review.	An update on the proposed organisational design will be given to Members at the seminar on 30 April. This will also include a proposed structure diagram. The intention is that further more detailed information in the form of a business case will be presented to the 20 May Board meeting for approval.	Organisational Development progressing:- Full structure agreed by Board in May 2020. Implementation of high level structure endorsed by the trade unions and formal consultation with affected staff underway. Ongoing informal engagement with all staff, prior to planned formal engagement. Ongoing informal engagement of full structure proposals with trade unions - to be presented to JNCC on 9 July	Full organisational re-design and new structure received full support from the JNCC on 9 July and triggered the start of formal consultation with staff. Group consultation was held on 14 July followed by individual consultations completed by 3 August. As part of group and individual consultation, staff can submit counter proposals on the full structure and/or individual circumstances. Any counter proposals will be fully considered as part of the consultation process and feedback provided. A progress update will be provided to the JNCC in September 2020.	CEO	Ongoing
Audit Scotland	2018/19 Annual Audit Report	Oct 19	Follow Up	The creation and approval of a workforce strategy is now critical. The further work required to fully develop the Data, Digital and ICT strategy should continue to enable funding to be identified and plans to be implemented.	No date	Partly actioned The Outline Business Case for DDICT was approved by the Board in September 2018 however funding has been lower than expected. The Estates Strategy was approved by the Board in May 2019. A framework for strategic workforce planning was approved in May 2019, <i>but the strategic workforce plan is still in development.</i>	Strategic Workforce plan scheduled for delivery November 2020 - as advised to the SPA Board Nov 2019	SPA representation on newly established SWP Project Board Internal Audit report of SWP to be reported to May meeting of ARAC	Internal Audit report on SWP reported to May meeting of ARAC SWP to be presented to the Board November 20	SWP to be presented to the Board November 20		Follow - up Ongoing
Audit Scotland	2018/19 Annual Audit Report	Oct 19	Follow Up	The newly implemented performance management framework must be reviewed and developed to support the identification and reporting of key performance areas.	No date	Partly actioned The new performance framework was approved by the Board in March 2019 and the first reporting against this framework is due in Q2 of 2019/20. <i>However, this has not been subject to audit review.</i>	Review of Police Scotland's Performance Management is included in the Strategic Internal Audit plan scheduled to be completed during 2021/22	No further update	Performance Management Internal Audit drafted and approved by SPA/PS. Approval required from ARAC	ARAC approved performance Management Internal Audit. Fieldwork scheduled to commence Nov 20		Follow - up Ongoing

**SPA AUDIT, RISK AND ASSURANCE COMMITTEE: SPA BUSINESS PLAN 20/21 - QUARTER TWO UPDATE**

<b>COMPLETE</b>
<b>ON TRACK</b>
<b>NOT DUE</b>
<b>AT RISK/DELAYED</b>

<b>STRATEGIC OUTCOME 1: Communities and partners have an informed understanding of crime and safety issues and the responsibilities and effectiveness of the police and forensic services in addressing them.</b>				
ACTIVITY	UPDATE AT Q2	OWNER	IMPLEMENTATION DATE	ACTION STATUS
<p><b>1.1</b> Work collaboratively with Police Scotland to agree a revised performance framework which provides evidence to enable the Chief Constable to account to the Authority for the performance of policing, including progress towards the outcomes of the Strategic Police Plan 2020-23 and the delivery of the Annual Police Plan 2020-21; and agree a plan to support continuous improvement of the framework.</p>	<p>Collaborative work culminated in revised framework and ongoing development plan approved by SPA Board in June 2020. <a href="https://www.spa.police.uk/spa-media/pdxbb12p/rep-b-20200618-item-6b-revised-policing-performance-framework.pdf">https://www.spa.police.uk/spa-media/pdxbb12p/rep-b-20200618-item-6b-revised-policing-performance-framework.pdf</a></p> <p>First quarter's reporting for 20/21 reported to Policing Performance Committee in August 2020 <a href="https://www.spa.police.uk/spa-media/3ocn2o0j/item-2-1-q1-performance-graphics-version.pdf">https://www.spa.police.uk/spa-media/3ocn2o0j/item-2-1-q1-performance-graphics-version.pdf</a></p>	<p><b>SPA Strategy Director &amp; Team</b></p>	<p><b>End Q2</b></p> <p><i>BAU to support PS colleagues on framework development throughout quarterly reporting during 20/21</i></p>	<p><b>COMPLETE</b></p>
<p><b>1.2</b> Put in place a robust mechanism to ensure that the impact on operational policing performance of exceptional issues (e.g. COVID-19, COP 26) is monitored, assessed and publicly communicated by the Authority</p>	<p>The SPA set out its overall strategic approach to the oversight of policing of COVID-19 on its website in March 2020, detailing strategic outcomes and key priorities for SPA's oversight during this period. <a href="https://www.spa.police.uk/_\$link-ref:'616701'">https://www.spa.police.uk/_\$link-ref:'616701'</a></p> <p>Formal monitoring was undertaken, including establishment of an Exceptional Circumstances Committee, and assessment through governance meetings covering issues such as workforce health and safety. Independent polling was commissioned to assess public attitudes to the policing of lockdown.</p> <p>The Board has regularly reported publicly and communicated to key external stakeholders on its work over the lockdown period and its assessment of the service's response to the impact of the pandemic.</p>	<p><b>SPA Board/ Interim Chief Executive</b></p>	<p><b>End Q2</b></p> <p><i>SPA Corporate team will provide a summary of key learning/good practice of the mechanism that can be applied to future exceptional issues for 21/22 and beyond.</i></p>	<p><b>COMPLETE</b></p>

**OFFICIAL**

<b>STRATEGIC OUTCOME 1: Communities and partners have an informed understanding of crime and safety issues and the responsibilities and effectiveness of the police and forensic services in addressing them.</b>				
<b>ACTIVITY</b>	<b>UPDATE AT Q2</b>	<b>OWNER</b>	<b>IMPLEMENTATION DATE</b>	<b>ACTION STATUS</b>
	The SPA Corporate team contributed ongoing briefing, knowledge capture, secretariat and membership to key groups e.g. Independent Advisory Group. SPA submitted evidence of its approach and contribution to Policing in the Pandemic to the Justice Sub-Committee on 27 August <a href="https://www.parliament.scot/S5_JusticeSubCommitteeOnPolicing/Inquiries/SPA_submission.pdf">https://www.parliament.scot/S5_JusticeSubCommitteeOnPolicing/Inquiries/SPA_submission.pdf</a>			
<b>1.3</b> Assess SPA, PS and FS performance information to inform content to be included in the Annual Report and Accounts (ARA)	Summary performance information from SPA Corporate, Forensic Services and Police Scotland, assessed by SPA, was presented to the Policing Performance Committee in May, informing the final June submission to Audit Scotland in line with ARA reporting timetable.	<b>SPA Strategy Director &amp; Team</b>	<b>End Q1</b> <i>Final ARA draft will be presented to SPA Board in September and published in October 2020</i>	<b>COMPLETE</b>
<b>1.4</b> Conduct analysis of the Scottish Crime and Justice Survey to determine how the results can be taken forward in relation to performance improvement	Two papers summarising key findings and variations from the Scottish Crime and Justice Survey were discussed at the Policing Performance Committee in May 2020 - <a href="https://www.spa.police.uk/spa-media/ugpdpeiu/rep-c-20200521-item-9-1-1-spa-analysis-of-data.pdf">https://www.spa.police.uk/spa-media/ugpdpeiu/rep-c-20200521-item-9-1-1-spa-analysis-of-data.pdf</a> The updated survey published in summer 2020 was analysed and considered as part of the work of the Authority through its own commissioned survey and Police Scotland's "Your Police" surveying and reporting. Public Confidence assessed through SPA, PS and SG surveying has been reported to the SPA Board and IAG during the reponse to the COVID-19 Pandemic. PS has now indicated the establishment of a Public Confidence Governance Board. SPA have proposed that membership is opened up to SPA and SG Justice Analytical Services in order to provide a forum for coordinating public confidence assessment and how this is taken forward within the performance framework.	<b>SPA Strategy Director &amp; Team</b>	<b>End Q2</b>	<b>COMPLETE</b>



**OFFICIAL**

<b>STRATEGIC OUTCOME 2:</b> The public are confident in policing with issues of public interest being addressed transparently, and the voices of communities taken into account in decision-making.				
<b>ACTIVITY</b>	<b>UPDATE AT Q2</b>	<b>OWNER</b>	<b>IMPLEMENTATION DATE</b>	<b>ACTION STATUS</b>
<b>2.1</b> Lead and influence thinking on the development of a more robust approach to measuring and improving public confidence in policing, especially including in exceptional circumstances, that impact on policing and forensic service delivery providing a strong focus on human rights, ethics and equalities, and ensuring these considerations are mainstreamed	Links to 1.4 above. A paper was submitted to the August Policing Performance Committee recommending that a multi-partner forum takes place to discuss recent developments in this space. <a href="https://www.spa.police.uk/spa-media/gtph0nik/item-9-public-confidence-in-policing-v0.pdf">https://www.spa.police.uk/spa-media/gtph0nik/item-9-public-confidence-in-policing-v0.pdf</a> Ongoing consideration will be given to the establishment of working or oversight groups into specific operational issues in accordance with the SPA Excellence Framework and Change Oversight Approach and the ability of the Authority to commission bespoke academic research or public opinion survey work	SPA Director of Strategy and Team	End Q2	COMPLETE
<b>2.2</b> Develop and implement the SPA 2020 Organisational Design programme	Update provided to August SPA Board by SPA Interim Chief Executive on recent progress made in relation to formal consultation with JNCC and staff and transitional arrangements. <a href="https://www.spa.police.uk/spa-media/oktoc2nb/rep-b-20200812-item-4-ceo-board-report-august-2020-vfinal.pdf">https://www.spa.police.uk/spa-media/oktoc2nb/rep-b-20200812-item-4-ceo-board-report-august-2020-vfinal.pdf</a>	SPA Interim Chief Executive	End Q3	ON TRACK
<b>2.3</b> Implement interim Angiolini Review recommendations and review SPA's statutory duty on publication of full Review, carrying forward any Review recommendations to 2021-22 if required	Update provided to Complaints and Conduct Committee on 27 August 2020 on progress towards implementation of recommendations from the Preliminary Report on the 'Review of Complaints Handling, Investigations and Misconduct Issues in Relation to Policing' <a href="https://www.spa.police.uk/spa-media/vhwp2kqt/rep-c-20200818-item-9-review-of-complaints-handling-etc-spa-update.pdf">https://www.spa.police.uk/spa-media/vhwp2kqt/rep-c-20200818-item-9-review-of-complaints-handling-etc-spa-update.pdf</a>	SPA Complaint & Conduct Manager	Ongoing	ON TRACK
<b>2.4</b> Deliver a SPA public engagement strategy and implementation plan, including a review of the SPA's digital, social media and other public engagement mechanisms	Dependent on role recruitment via SPA 2020 Organisational Design programme	Head of Strategic Business Mgt.	End Q4	NOT DUE
<b>2.5</b> Monitor and manage the short and longer term impact of COVID-19 on the Independent Custody Visiting Scheme and publish the ICVS Annual Review including an assessment on Human Rights/OPCAT compliance	As part of the Chief Executive update to the SPA Board on 19 August 2020 a paper was presented providing information on the SPA Independent Custody Visiting Scheme including specific monitoring put in place during COVID 19. <a href="https://www.spa.police.uk/spa-media/oktoc2nb/rep-b-20200812-item-4-ceo-board-report-august-2020-vfinal.pdf">https://www.spa.police.uk/spa-media/oktoc2nb/rep-b-20200812-item-4-ceo-board-report-august-2020-vfinal.pdf</a> . The ICVS draft annual review was presented to the Policing and Performance Committee on 26 August 2020 for members to comment and provide feedback on proposed content before laying in Parliament and publication.	SPA ICVS National Manager	End Q4	ON TRACK

**OFFICIAL**

<b>STRATEGIC OUTCOME 3: Effective collaboration with partners improves services and outcomes for individuals and communities</b>				
<b>ACTIVITY</b>	<b>UPDATE AT Q2</b>	<b>OWNER</b>	<b>IMPLEMENTATION DATE</b>	<b>ACTION STATUS</b>
<b>3.1</b> Seek assurance through regular, planned engagement with Police Scotland and local authorities that local police plans appropriately reflect the needs of communities	Dependent on role recruitment via SPA 2020 Organisational Design programme Discussion of scrutiny of police performance at local level Policing Performance Committee 26 August 2020, with a commitment for report to Committee late 2020/early 2021 on the future development of the local and national liaison model, as in partnership between the SPA, COSLA and local government partners <a href="https://www.spa.police.uk/spa-media/Ovkfhh4/item-5-la-scrutiny-arrangements.pdf">https://www.spa.police.uk/spa-media/Ovkfhh4/item-5-la-scrutiny-arrangements.pdf</a>	<b>Head of Strategic Business Mgt.</b>	End Q4	<b>NOT DUE</b>
<b>3.2</b> Work collaboratively with strategic partners in recognition of the expanded public health role by Police Scotland as a result of COVID-19 and take into account the advice and findings of the Independent Advisory Group in order to monitor and assess consent for policing service delivery	Linked to 1.4 and 2.1 with regard to public confidence and policing by consent. The outputs of and learning from the IAG will be incorporated into the design of future oversight working and assurance groups and will also shape the approach being taken by the COP26 Oversight Group and CAM Oversight Group currently in place.	<b>SPA Director of Strategy and Team</b>	End Q2	<b>COMPLETE</b>
<b>3.3</b> Develop existing collaboration with British Transport Police through the work of the Scottish Railways Policing Committee	Update on collaboration between Police Scotland and BTP in Scotland is a standing agenda item at meetings of the Scottish Railways Policing Committee	<b>Risk and Policy Specialist</b>	End Q4	<b>ON TRACK</b>
<b>3.4</b> Through oversight of strategy implementation, support policing to engage in collaborative and innovative service design which reduces harm and related demand, including the delivery of relevant aspects of the Scottish Government's Mental Health Strategy	Developing work in a number of areas including through the oversight and support of the delivery of Annual Police Plan commitments and reporting through the Performance Framework and Change Oversight. Work coordinated through the Health and Justice Collaborative and Joint Drugs Task Force and through SPA input to a collaboration strategy refresh sponsored by the Reform Collaboration Group.	<b>SPA Director of Strategy and Team</b>	End Q4	<b>ON TRACK</b>

**OFFICIAL**

<b>STRATEGIC OUTCOME 4: Resourcing requirements are based on evidence of demand, the needs of communities and securing Best Value</b>				
<b>ACTIVITY</b>	<b>UPDATE AT Q2</b>	<b>OWNER</b>	<b>IMPLEMENTATION DATE</b>	<b>ACTION STATUS</b>
<b>4.1</b> Work with Police Scotland to establish an evidence-based and sustainable budget for 2021-22 and beyond that delivers best value, making a robust case to Scottish Government for funding	Business as Usual – Interim Chair’s report and key messages at SPA Board in August provides relevant context and references partnership-working taking place to support the case for future funding <a href="https://www.spa.police.uk/spa-media/onvfomnq/rep-b-20200812-item-2-interim-chair-s-report.pdf">https://www.spa.police.uk/spa-media/onvfomnq/rep-b-20200812-item-2-interim-chair-s-report.pdf</a>	AO/PS Finance Team	End Q4	ON TRACK
<b>4.2</b> Monitor SPA, Forensic Services and Police Scotland budget and expenditure on a monthly basis during 2020-21 and provide oversight and scrutiny of the use of reform funding, so that there is evidence and assurance that it has been used as intended	Business as Usual – latest expenditure report from August SPA Board including use of reform funding <a href="https://www.spa.police.uk/spa-media/j2zbj0cp/rep-b-20200807-item-8-financial-performance-report.pdf">https://www.spa.police.uk/spa-media/j2zbj0cp/rep-b-20200807-item-8-financial-performance-report.pdf</a>	AO/PS Finance Team	End Q4	ON TRACK
<b>4.3</b> Conduct oversight and evaluation of the planning and resourcing of policing required for one-off, costly operations such as COP26 and COVID-19 response	SPA has established a COP26 Oversight Group that meets at six weekly intervals, with HMICS and Scottish Government in attendance. Recent meetings were held in July and August, with progress reported through Committee Chairs reports to the SPA Board. Page 3 - <a href="https://www.spa.police.uk/spa-media/qa3ae040/rep-b-20200814-item-13-committee-and-oversight-group-chairs-reports.pdf">https://www.spa.police.uk/spa-media/qa3ae040/rep-b-20200814-item-13-committee-and-oversight-group-chairs-reports.pdf</a> Detailed COP26 resourcing and costs are included in published financial monitoring reports – see 4.2. above Links also to 1.2 re the SPA strategic approach to oversight of policing during the pandemic. In March 2020 SPA established an Exceptional Circumstances Committee to provide oversight of COVID-related matters. <a href="https://www.spa.police.uk/news/spa-approves-establishing-exceptional-circumstances-committee/">https://www.spa.police.uk/news/spa-approves-establishing-exceptional-circumstances-committee/</a> Latest reports COVID cost implications - <a href="https://www.spa.police.uk/spa-media/30jmaieb/item-2-1-combined.pdf">https://www.spa.police.uk/spa-media/30jmaieb/item-2-1-combined.pdf</a>	AO/PS Finance Team	End Q4	ON TRACK
<b>4.4.</b> Review business cases presented to the SPA, enabling constructive scrutiny to support the achievement of best value	Business as Usual conducted through Resources Committee – recent cases scrutinised – Full Business Case - FBC Video Conferencing; Initial Business Case - GDPR Digital Drives and force Wide Analytics; Initial Business Case - Age of Criminal Responsibility.	Director of Strategy/ Change Lead	Ongoing	ON TRACK
<b>4.5</b> Develop a benefits baseline approach that will provide sufficient evidence and	The first of the 6-monthly reports on transformational change was presented to the SPA Board on 19th August.	Director of Strategy/	End Q2	ON TRACK

**OFFICIAL**

STRATEGIC OUTCOME 4: Resourcing requirements are based on evidence of demand, the needs of communities and securing Best Value				
ACTIVITY	UPDATE AT Q2	OWNER	IMPLEMENTATION DATE	ACTION STATUS
information from Police Scotland to enable SPA to oversee change robustly, and facilitates an assessment from Police Scotland of both use of resources and evidence of benefits of transformational change across policing, reporting publicly every 6 months	<a href="https://www.spa.police.uk/spa-media/5nxffnfs/rep-b-20200819-item-6a-spa-oversight-of-change-in-policing.pdf">https://www.spa.police.uk/spa-media/5nxffnfs/rep-b-20200819-item-6a-spa-oversight-of-change-in-policing.pdf</a> The next formal SPA Board routine report will be in February 2021 with committee and Board scrutiny focused on embedding the change culture and improvement in policing as SPA business as usual as agreed in February 2020.	Change Lead		
<b>4.6</b> Establish and agree SPA roles and responsibilities in respect of Best Value and conduct a gap analysis to identify action areas, including those relating to equality, diversity and human rights considerations taken into account in financial and other decision-making responsibilities, to inform an SPA-wide Best Value assessment	A workshop was held in July to identify key areas of focus and a comparison of BV methodology and external guidance is currently being conducted. Proposal on the approach and planned actions in relation to this work will be presented to ARAC in September 2020.	AO/SPA Corporate team	End Q2	ON TRACK

STRATEGIC OUTCOME 5: A valued and engaged workforce that represents the communities it serves, and has the confidence and skills to deliver excellent services and adapt to changing demands				
ACTIVITY	UPDATE AT Q2	OWNER	IMPLEMENTATION DATE	ACTION STATUS
<b>5.1</b> Clarify the role of the SPA regarding workforce governance and other statutory responsibilities/legal employer liabilities within a revised SPA Governance & Accountability Framework Document and SPA Corporate Governance Framework, and develop and implement an SPA Workforce Governance Framework which sets measurable standards against fulfilment of this role	Ongoing contributions to both revision of the SPA Corporate Governance Framework and development of a Think Piece around potential legislative changes – completed in Jan & April 2020 respectively. Progress has been made on establishment of a Workforce Governance Committee (additionally serving to support clarity of SPA role) with an initial draft reviewed by SPA Governance Development and Improvement Group in May 2020, and a further draft due in Sep 2020. Work ongoing to finalise draft Workforce Governance Framework with a review of framework document ongoing	Head of HR Governance & team	End Q2  <i>Original timescales were impacted by other priorities – e.g. COVID-19, BaU HR Governance and SPA 2020 work). A revised timescale now in place to present draft Framework to Workforce Governance Committee upon establishment.</i>	ON TRACK

**OFFICIAL**

<b>STRATEGIC OUTCOME 5: A valued and engaged workforce that represents the communities it serves, and has the confidence and skills to deliver excellent services and adapt to changing demands</b>				
<b>ACTIVITY</b>	<b>UPDATE AT Q2</b>	<b>OWNER</b>	<b>IMPLEMENTATION DATE</b>	<b>ACTION STATUS</b>
<b>5.2</b> Seek assurance around the development and effective implementation of the 2020-21 Police Scotland People Strategy Implementation Plan, ensuring clear reporting against planned timescales for completion of agreed deliverables, and demonstrating evidence of impact of completed actions against strategic outcomes	Scrutiny of the Draft People Strategy Year 3 Annual Delivery Plan 2020/21 was carried out by Resources Committee in August 2020. Importance emphasised of ensuring that effective arrangements are in place for tracking progress and measuring impact. Mid-year review scrutiny planned for November Committee	Head of HR Governance & team	End Q4	NOT DUE
<b>5.3</b> Ensure the development of effective mechanisms for the SPA to engage with staff associations and trade unions, recognising their role as key organisational stakeholders and more specifically in representing the views of the wider workforce	Development of revised Partnership Forum Terms of Reference were agreed in Aug 2020. Progress has been made towards the establishment of a new Workforce Governance Committee with membership drawn from staff associations and trade unions - discussed at August 2020 Partnership Forum. The forum will be formally consulted on draft Committee Terms of Reference prior to presentation to SPA Board. Scoping carried out of further options for engagement mechanisms – informally with Members and formally via Committee with a draft Board options paper developed.	Head of HR Governance & team	End Q2 <i>Awaiting further discussion with Members</i>	ON TRACK
<b>5.4</b> Influence and seek assurance on the development of Police Scotland’s evidence-based approach to workforce planning, informed by demand and underpinned by best value	In August 2020 Resources Committee considered progress reported by Police Scotland on the Strategic Workforce Plan and interdependencies with current and future demand, productivity gains and new ways of working. Committee concluded that “the report did not provide the evidence base requested and therefore at this stage the committee can give no assurance to the Board that the SWP will be supported by a robust evidence base in respect of these interdependencies” p.13 of Committee Chairs report; <a href="https://www.spa.police.uk/spa-media/qa3ae040/rep-b-20200814-item-13-committee-and-oversight-group-chairs-reports.pdf">https://www.spa.police.uk/spa-media/qa3ae040/rep-b-20200814-item-13-committee-and-oversight-group-chairs-reports.pdf</a>	Head of HR Governance & team	End Q3	NOT DUE

**OFFICIAL**

<b>STRATEGIC OUTCOME 5: A valued and engaged workforce that represents the communities it serves, and has the confidence and skills to deliver excellent services and adapt to changing demands</b>				
<b>ACTIVITY</b>	<b>UPDATE AT Q2</b>	<b>OWNER</b>	<b>IMPLEMENTATION DATE</b>	<b>ACTION STATUS</b>
	Police Scotland also reported to Policing Performance Committee in August to enable scrutiny on the work of the Demand and Productivity Unit to support workforce planning. The report outlined the history, intended function and outputs of the Demand and Productivity Unit however Committee concluded that it still does not allow a clear assessment of demand across the policing system, although learning and progress were being made.			
<b>5.5</b> Ensure timely and effective advance employer-side planning in order to facilitate early agreement of reasonable and affordable workforce pay and reward settlements for 2021-22.	Business as Usual – Preparation and Planning for Police Officer and Staff Pay awards was recommended to the Authority for approval at August 2020 Resources Committee.	<b>Head of HR Governance &amp; team</b>	<b>End Q3</b>	<b>ON TRACK</b>
<b>5.6</b> Oversee the management of a robust recruitment and selection process in respect of Police Scotland Chief Officer vacancies	Business as Usual – Completion in May 2020 of SPA-led management of ACC Senior Officer Recruitment process. Planned revision of Senior Officer Recruitment procedure in light of lessons learned in advance of future process.	<b>Head of HR Governance &amp; team</b>	<b>End Q2</b>  <i>Lessons learned exercise to commence following Succession Planning &amp; Appointments Committee meeting Aug 2020 and for completion by end Q4. No further recruitment activity planned this financial year.</i>	<b>COMPLETE</b>

**OFFICIAL**

**STRATEGIC OUTCOME 6:** Decision making, scrutiny and reporting is based on robust evidence and analysis of current and emerging policing issues

ACTIVITY	UPDATE AT Q2	OWNER	IMPLEMENTATION DATE	ACTION STATUS
<p><b>6.1</b> Implement a consistent new approach to SPA business coordination across all Board and Committee communications, briefings, evidence and research to contribute to development of a robust evidence-base to support the Authority's decision-making role in relation to its statutory responsibilities and continuous improvement including external recommendations</p>	<p>Although final delivery of this objective is dependent on implementation of the new SPA 2020 structure beginning in Q3, from April 2020 a monthly SPA Business Coordination meeting has been held, covering the following related areas of business;</p> <ul style="list-style-type: none"> <li>- Managing the cross-team information flow to support Board and Committees;</li> <li>- Providing updates and input on specialist/overlapping areas to improve forward planning and member briefing;</li> <li>- Feedback and assessment of previous events to help improve process/procedures</li> <li>- Sharing of COVID-related information and knowledge to enhance the existing evidence base, including input from officers involved in different areas of scrutiny – e.g. IAG, OptICAL</li> <li>- Enabling discussion and progress on key business priority activities – e.g. Business Plan delivery; improvement recommendations.</li> </ul>	<p>SPA Head Of Corporate Management</p>	<p>End Q3</p>	<p>ON TRACK</p>
<p><b>6.2</b> Scrutinise and support the development of Police Scotland's evidence base on demand, seeking assurance that it provides robust information to assess and analyse demand on police services, support innovation and the future development of services and evidence of the impact of service redesign in reducing harm and related demand.</p>	<p>Resources and Policing Performance Committees are being supported by SPA staff in their support and challenge to the Demand and Productivity Unit and wider data and analytical capability in PS. ARAC commissioned independent audit activity to provide further insight and guidance to improve demand analysis. Coordination and collaboration ongoing with HMICS who are also focusing on demand analysis through their own inspection activity.</p>	<p>SPA Strategy Director &amp; Team</p>	<p>End Q4</p>	<p>ON TRACK</p>
<p><b>6.3</b> In collaboration with Police Scotland develop an approach to horizon and environmental scanning to identify relevant information and enable strategic assessment that will support the SPA advice and assurance function, taking into account wider societal changes</p>	<p>Initial discussions and high-level proposals are being considered on the future form and function of a Strategic Coordination function within the SPA as part of the wider SPA 2020 Organisational Design programme</p>	<p>SPA Strategy Director &amp; Team</p>	<p>End Q3</p>	<p>ON TRACK</p>

**OFFICIAL**

ACTIVITY	UPDATE AT Q2	OWNER	IMPLEMENTATION DATE	ACTION STATUS
<b>6.4</b> Develop a high-level mandate for the SPA and Police Scotland Joint Research Forum that will enable the forum to improve and extend its influence and reach across policing and academia	The Joint Research Forum continues to enhance both its standing and expansion of areas of interest. The next event is a webinar on Artificial Intelligence and Policing taking place in September 2020. The Forum's work to date has been summarised for SIPR's forthcoming Annual Report and Accounts, which will help raise awareness.	SPA Strategy Director & Team	End Q2	COMPLETE
<b>6.5</b> Deliver a suite of seminars and events including: SPA/PS Benchmarking Seminar; Joint Re-search Forums; Knowledge Exchange events	A number of highly regarded and valued events have been delivered so far in-year and events continue remotely through teleconferencing during the current restrictions.	SPA Strategy Director & Team	End Q4	ON TRACK