SCOTTISH POLICE AUTHORITY

Agenda Item 6

Meeting	Audit, Risk and Assurance Committee
Date and Time	06 May 2020
Location	Tele-conference
Title of Paper	Police Scotland Audit and Improvement Recommendations Tracker Q4 Update
Presented By	ACC Alan Speirs, Professionalism and Assurance
Recommendation to Members	For Discussion
Appendix Attached:	YES Appendix A – Recommendations Tracker Appendix B – New HMICS Recommendations

PURPOSE

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

Members are invited to discuss the content of this paper.

1 BACKGROUND

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

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

All recommendations are assessed in terms of the risk it presents to Police Scotland so that we can prioritise activity. Internal Audit use the following risk grading structure and this has been applied to all recommendations within Police Scotland, regardless whether they have been made by Internal Audit. This ensures a consistent approach is taken, allows for prioritisation and enables comparisons to be made.

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

2 FURTHER DETAIL ON THE REPORT

The following provides a summary of progress:

Closures

- **32 recommendations are proposed for closure**. Of those closed, 4 were High Risk, 24 Medium Risk and 4 Low Risk. The following provides a brief summary of some achievements in the last quarter.

- **C3 Call Handling**
  A C3 procedures manual has been published internally replacing the old A-Z. This supports staff decision making.

- **Events**
  We have addressed inconsistencies in the way we use Duty Management systems for resourcing events to achieve greater efficiency and effectiveness.

  We have worked alongside the Scottish Police Federation to clarify guidance in respect of deployment. This has provided officers with clear guidance and addressed inconsistencies referring back to legacy arrangements and improving officer wellbeing.

  We have reviewed our approach to deployment of resources at events to widen the pool of available officers. This is reducing the impact on local officers repeatedly being used.

- **Custody**
  We have reviewed leadership within Criminal Justice Services to ensure continuity.

  We have reviewed the procedures and introduced safeguards within the SOP for strip searching children.

- **Firearms Licensing**
  We have introduced a performance framework and reporting process for the standards of service within the Firearms Licensing function.

- **Annual Review of Policing Plan**
  We have reviewed our approach to producing the Strategic Assessment.

- **Efinancials Internal Audit**
  We have reviewed and communicated the System Operating Procedures for the Efinancials and Asset 4000 systems to ensure there is appropriate awareness of roles and responsibilities.

- **Complaints Handling Review**
  We have reviewed the composition of staff dealing with complaints, developed and communicated consistent

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procedures across Police Scotland and simplified the forms used.

Open Recommendations

There are 191 recommendations open on the tracker comprising Internal Audit, HMICS, External Auditors and Regulators along with Internal Assurance Reviews.

Open Recommendations by High Risk

- **2 recommendations** have a Very High Risk rating and 42 have a High Risk rating. This represents 23% of all open recommendations.

- At this review, **5 High Risk recommendations** have been missed which is an increase of 3 from the last quarter. Further details are documented more fully at Table 1.

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

Date Published	Report Title + Recommendation	Update + Reason for Missing	Owner	Due
March 2019	**Information Management – Data Security Management – Internal Audit** *GSC non compliance added to SOP* Adding paragraph to existing SOP to confirm that non compliance with GSC classifications is an information security incident. **Risk** **There is a risk that data will be compromised due to being sent to unauthorised addresses. The Information Assurance Team not being aware of all instances by which information is insecurely transmitted.** **~ Previously reported ~**	The SOP has been updated but is being held up pending completion of the SOP review. We are producing SOPs in a revised format.	ACC Profession-alism and Assurance	~~31.10.2019~~ ~~30.04.2020~~ June 2020
March 2019	**Financial Planning – Internal Audit** *Development of Benefits Realisation Plans*	Previously reported as being at risk of delay. This is due to timing of Change Board to approve the updated Benefits Framework and allow for	Director of Change	~~31.10.2019~~ ~~31.12.2019~~ May 2020

Date Published	Report Title + Recommendation	Update + Reason for Missing	Owner	Due
	Risk **There is a risk that, unless the new processes are fully adopted and embedded, SPA and PS are not able to deliver all identified benefits due to the lack of detailed, accurate and up to date benefits realisation plans. This may result in failure to address the current budget deficit in the agreed timeframes.** **~ Previously reported ~**	communication thereafter. **Impact of Delay:** We are reinforcing and communicating the need for each project to produce and maintain benefits realisation plans but need to ensure the Framework is finalised and approved before this action can be closed.		
January 2020	**IT System Review – Efinancials and Asset 4000 - Internal Audit** *Creation of Access Control Matrix* **Risk** **There is a risk that by creating new roles on an ad-hoc basis and without an agreed access control matrix, users may be granted access which exceeds their role and responsibilities. This could result in segregation of duties designed into business processes being undermined.** **~ New ~**	User access matrix has been approved by the SMT, and roles have been created within the test system. There was a problem with the test system and therefore users have been unable to access this to test the revised roles. As a result, the implementation of the revised roles will not be completed until this can be resolved. Given the pressure on ICT as a result of COVID-19 it is anticipated that the resolution of this issue will take longer than would be the case in a BAU environment.	CFO	~~31.03.2020~~ 31.05.2020
June 2017	**IT Service Delivery Internal Audit** *BCM/Disaster Recovery General* **Risk** **Due to the high volume of changes over critical systems, there is a risk that, if ICT recovery plans are not updated in light of changes to made to the technology environment, they may not be capable of supporting the response to a business interruption. This could result in unforeseen delays in restoring the recovery of ICT services to users. This could also result in negative publicity if there was an impact on**	The planned recovery test for SCOPE did not go ahead as planned on 20 April 2020. Further slippage projected until such time as the COVID-19 situation resolved, given the need to have constant access to HR / Duty Management systems, and the risk of causing interruption to service.	CDIO	~~20.04.2020~~ July 2020*

| Date Published	Report Title + Recommendation	Update + Reason for Missing	Owner	Due
	public services. **~ New ~**			
March 2019	**IT Application Review SCOPE Internal Audit** BCM/Disaster Recovery General **~ New ~**	Further slippage projected until such time as the COVID-19 situation resolved, given the need to have constant access to HR / Duty Management systems, and the risk of causing interruption to service.	CDIO	~~March 2020~~ July 2020*

*exact dates to be determined and provided by business area but we are estimating to be in the next quarter.

Graph 1 – Risk Breakdown

The following graph shows the breakdown of open recommendations according to risk. The percentage of Very High and High Risk recommendations is currently 23%.
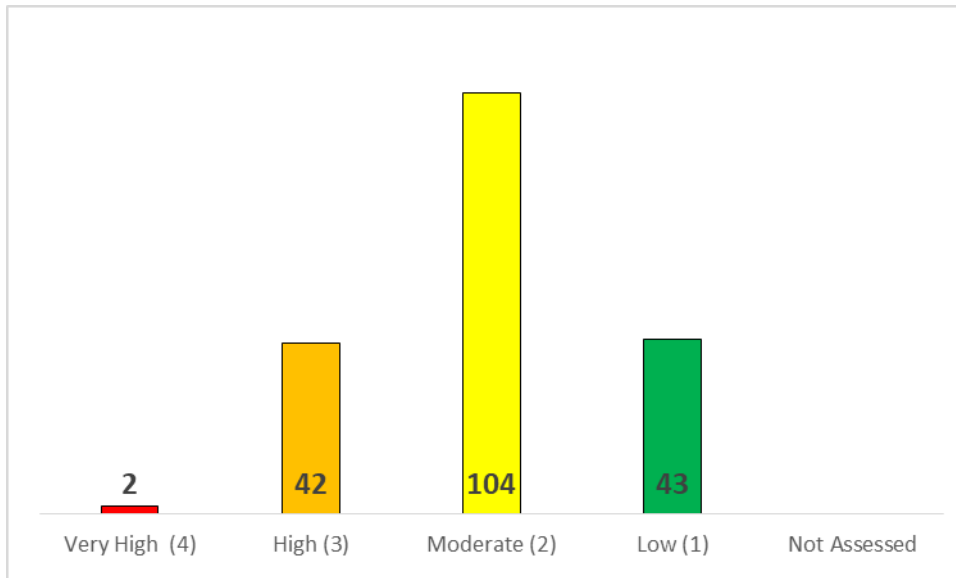
Graph 2 – Total Recommendations by Progress Status

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

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

In total 42 recommendations have missed their original date of completion across all risk categories. This is an increase of 18 since the last reporting period end of December 2019. 26 of these are currently showing slippage of between 1-3 months which means they will be addressed at the next quarterly update.

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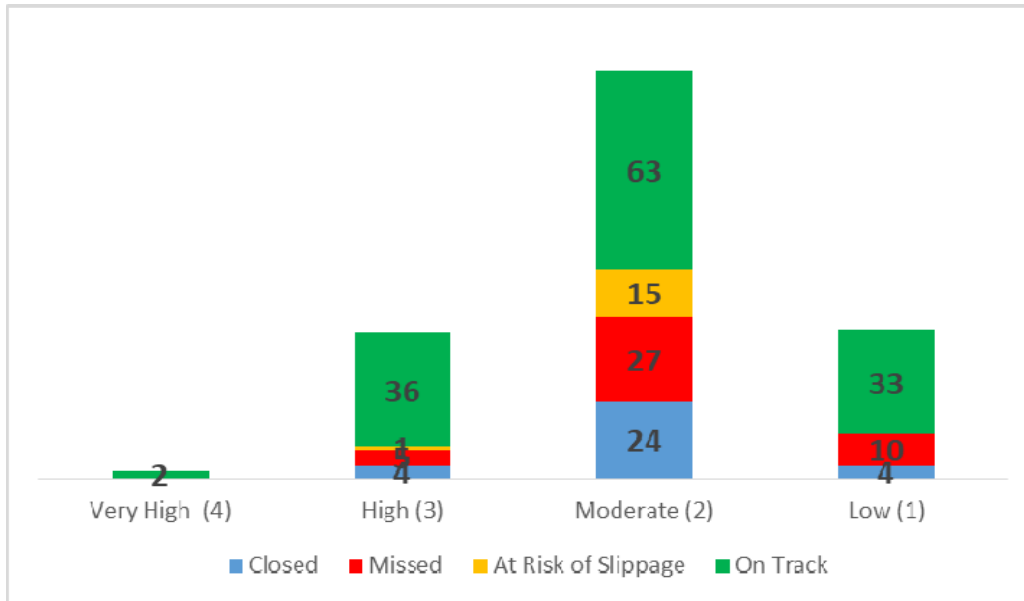
Trends

The following graphs illustrate the trend in dealing with recommendations since 2017. In summary

- There has been a gradual reduction in the number of recommendations made to Police Scotland despite us expanding the use of the tracker and monitoring a greater range of audit and inspection activity - as shown in **Graph 3**.
- There has been an overall reduction in the number of high risk recommendations made to Police Scotland in each year shown in **Graph 4**.
- We are consistently closing 200+ recommendations per year. Note that it is not always possible to close all recommendations made in a year within the same time period. **Graph 5** compares the number of recommendations closed across the three year period.
- There has been a gradual reduction in the number of recommendations open at end of March 2020 when compared to previous years as shown in **Graph 6**.
- The number and percentage of recommendations open at the end of March 2020 is less than that reported in previous years as shown in **Graphs 7 and 8**.
- In relation to those recommendations that have been missed, there has been a considerable effort to gradually reduce the number missed at each review with a particular focus on those in the High Risk category – this is shown in **Graph 9**.
- For perspective, **Graph 10** shows the percentage of High Risk recommendations missed when compared with the total number of open recommendations. For 2019/20 we were on

track to reduce this further from the 2018/19 total, however, some recommendations were not able to be finalised at year end due to abstractions relating to Covid-19.

- **Graph 11** shows the percentage of High Risk recommendations missed as a proportion to the total number of recommendations. Again, due to abstractions to deal with Covid-19, 3 recommendations were impacted and unable to be concluded. Had they been addressed, the % for end of March 2020 would have been 1% of the total number of recommendations.

Graph 3 Number of recommendations made – Closed Vs Open
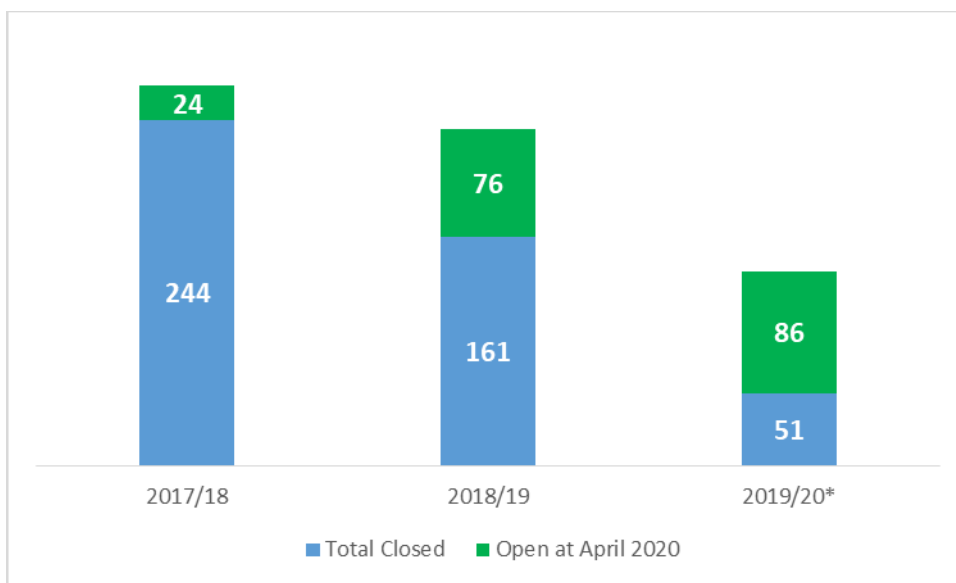
*more audits and inspections to be finalised and added to this amount.

Graph 4 Number of recommendations made per year with a Very High or High Risk status
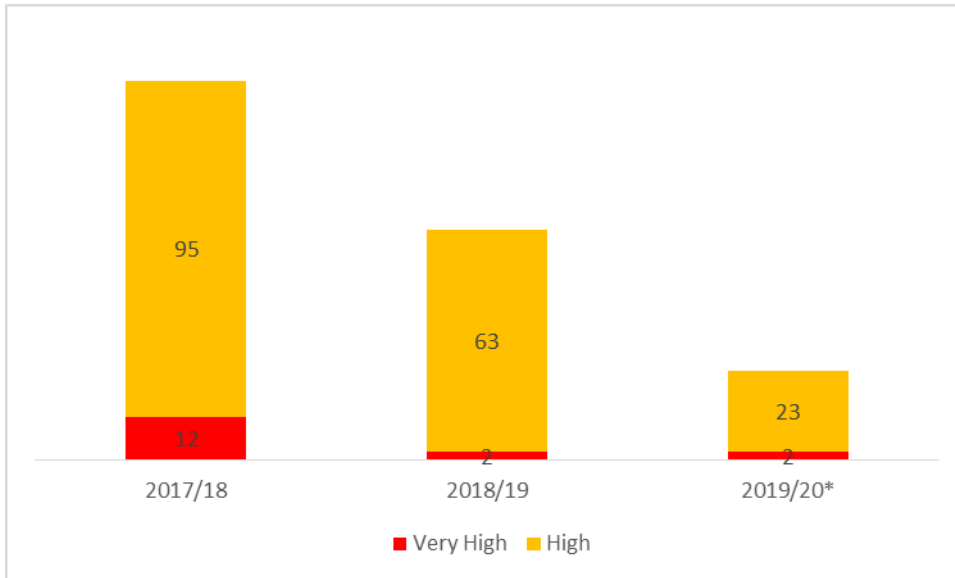
*more audits and inspections to be finalised and added to this amount.

Graph 5 Number of recommendations closed per year
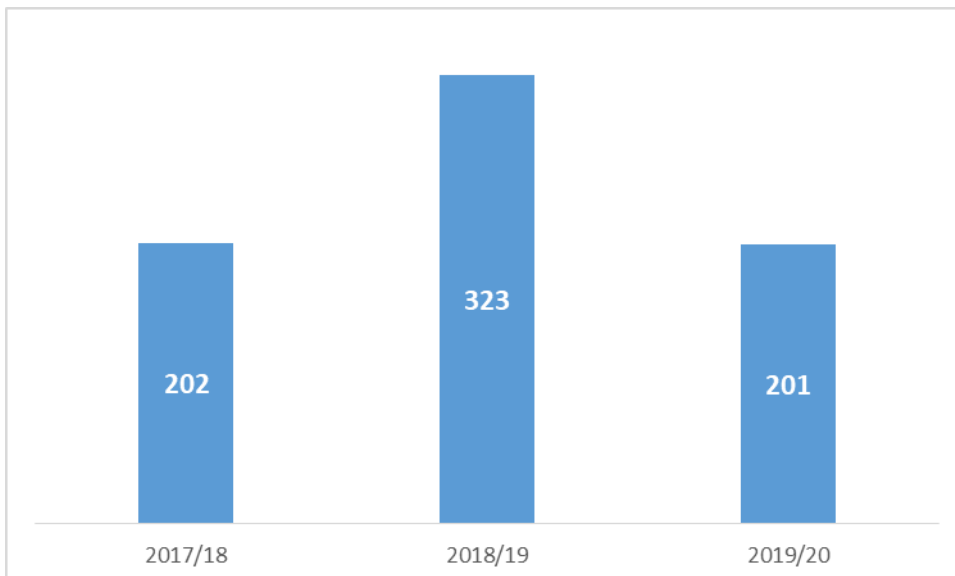
Graph 6 Number of recommendations open at end of March each year
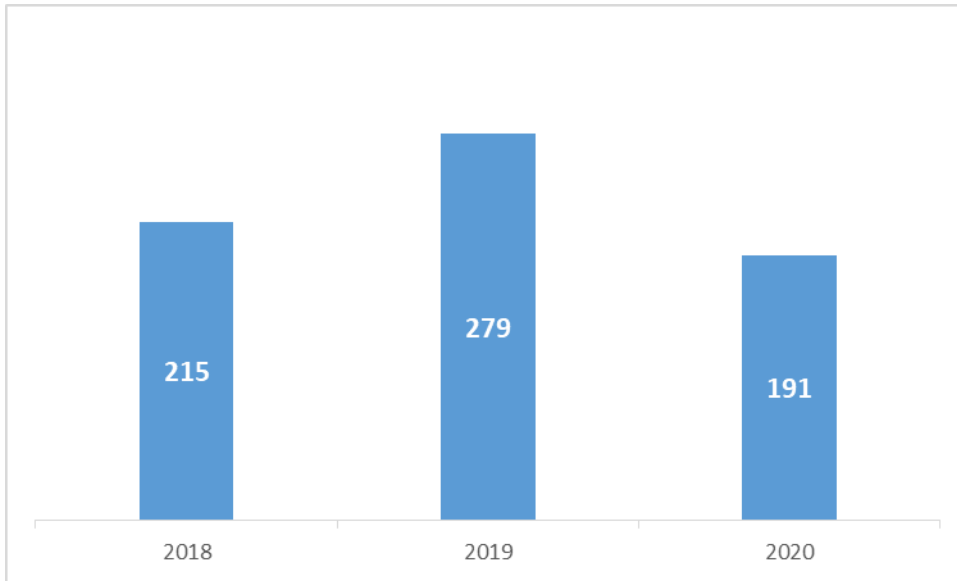
*number open per year will include recommendations made in previous years.

Graph 7 Number of High Risk recommendations at end of March each year
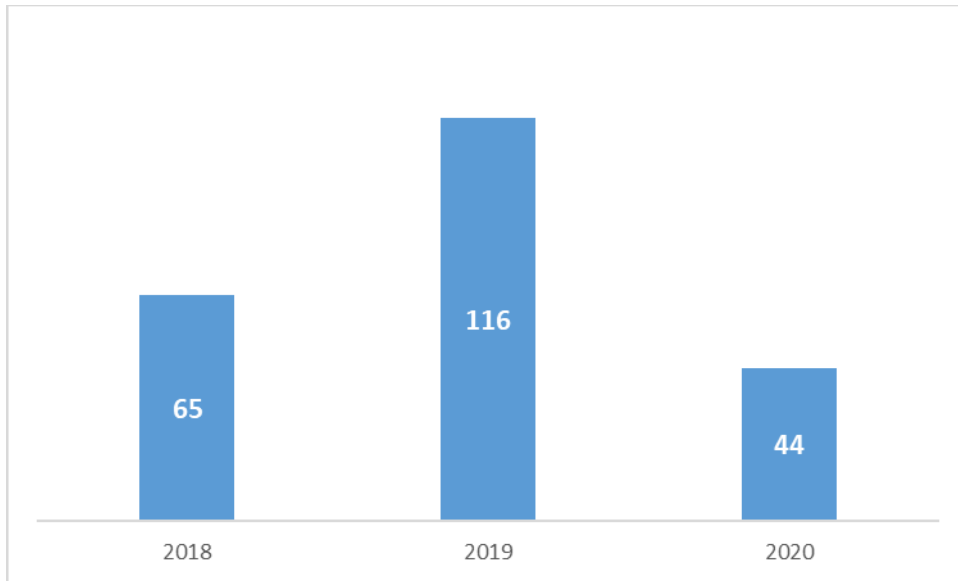
Graph 8 Percentage of High Risk recommendations at end of March in each year (shown in Red)
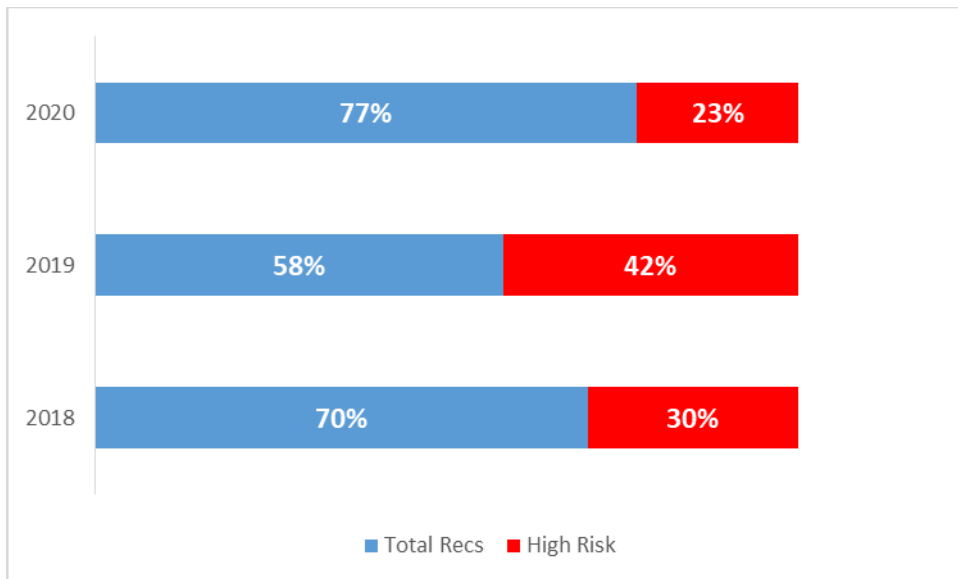
Graph 9 Number of missed recommendations - High Risk Missed shown in BLACK and Medium/Low Missed shown as RED
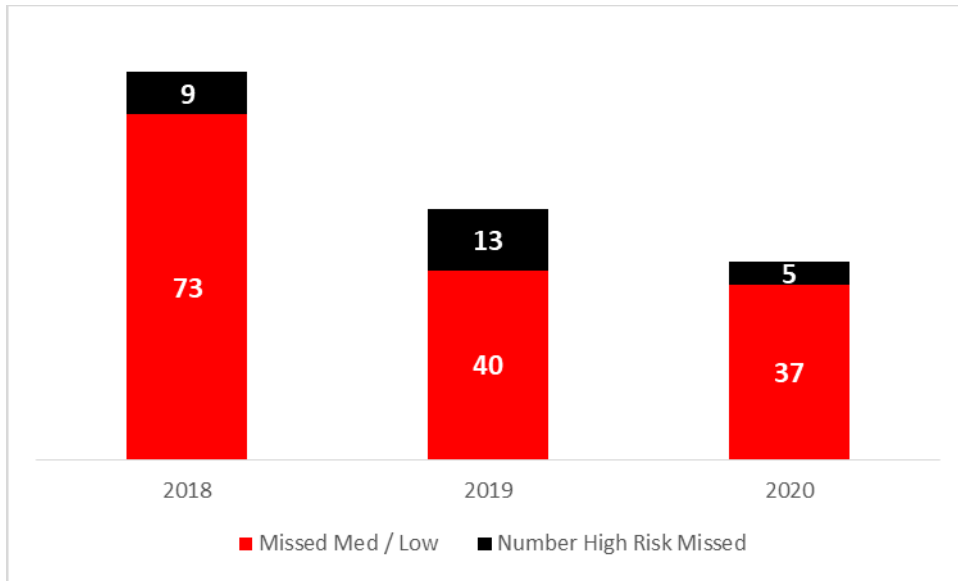
Graph 10 Percentage of all missed recommendations to total open recommendations at end of March per year
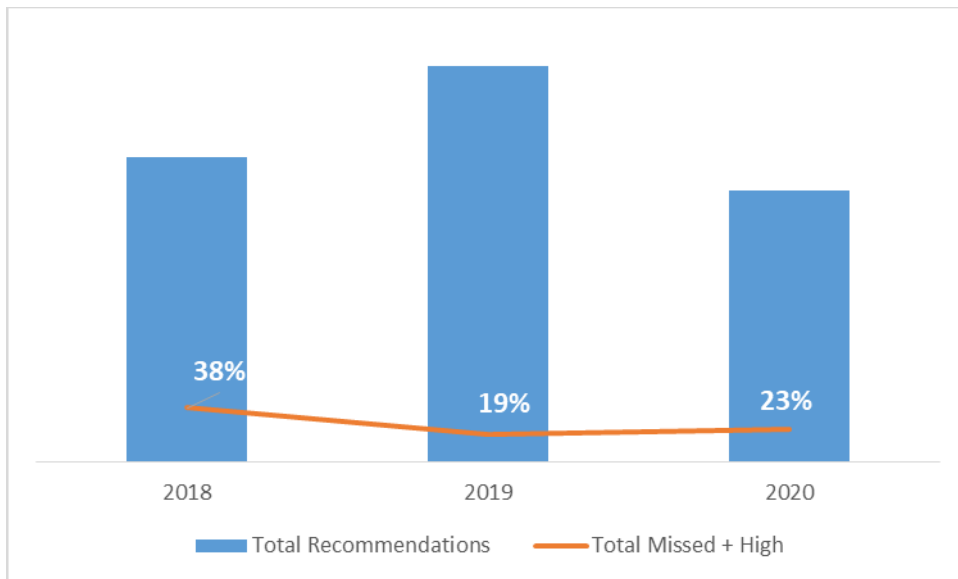
Graph 11 Percentage of High Risk missed recommendations to total number of open recommendations
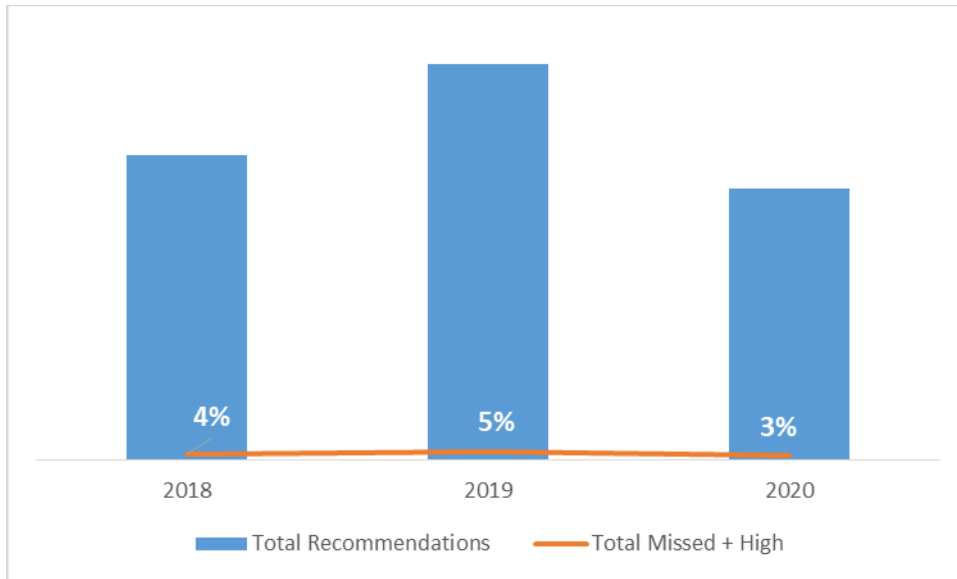
New Recommendations

During the quarter, 7 new reports were added for tracking containing 51 recommendations. This included: 1 Audit Scotland report, 1 Internal Audit report, 1 HMICS report and 4 Internal Assurance Reviews. The reports from both Audit Scotland and Internal Audit are submitted to the Audit, Risk and Assurance Committee separately.

The HMICS publication relates to the Strategic Review of Police Scotland's Response to Online Child Sexual Abuse and was published on 26 February 2020. The report makes 10 recommendations for Police Scotland to address. An action plan is currently in draft under the leadership of ACC Crime and Prevention. Once finalised this will be returned to HMICS by the agree deadline of 3 months following publication.

A summary of the Key Findings and Recommendations from the report is attached at **Appendix B** and a full version of the report can be found online at
https://www.hmics.scot/publications/strategic-review-police-scotlands-response-online-child-sexual-abuse

3   FINANCIAL IMPLICATIONS

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

4   PERSONNEL IMPLICATIONS

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

5   LEGAL IMPLICATIONS

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

6   REPUTATIONAL IMPLICATIONS

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

7   SOCIAL IMPLICATIONS

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

8   COMMUNITY IMPACT

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

9   EQUALITIES IMPLICATIONS

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

10. ENVIRONMENT IMPLICATIONS

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

RECOMMENDATIONS

Members are invited to discuss the content of this report.

Internal Audit Recommendations Progress Tracker - Q4 March 2020

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

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed Mar	Missed	Slippage	On track			
IT Service Delivery June 2017 15 recommendations	0	0					This outstanding recommendation relates to developing a plan for ICT Recovery of key systems. This was expected to be achieved by mid April for the SCOPE system but will experience some slippage. This work will be delayed until such time as the COVID-19 situation is under control given the need to have constant access to our HR / Duty Management systems, and the risk of causing interruption to service.	**CDIO**	
	3	2		1					
	9	9							
	3	3							

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

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed Mar	Missed	Slippage	On track			
Staff Performance Management December 2018 5 recommendations	0						These actions are dependent on the roll out of the new staff appraisal process. The launch of My Career and the phased rollout scheduled for 1 April 2020 has been paused by a least a month due to Covid-19. The work is complete and is ready to be implemented as and when a decision is taken. This will be reviewed on a monthly basis.	**DoPD**	
	1					1			
	3					3			
	1					1			

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed Mar	Missed	Slippage	On track			
Financial Planning March 2019 4 recommendations	0						*** High risk - Development of benefit realisation plans - Work is progressing but an extension has been requested to allow for the presentation of evidence to the Auditors. Benefits Framework developed, originally scheduled for approval at March/April Change Board but now planned for Change Board on 05/05/20. ***Medium risk - Long Term Financial Plan - interim report provided on medium term planning scenarios with a full refresh of the longer term strategy was due March 2020 but due to delay in notification from Scottish Government re budget this has been further delayed to December 2020.	**CFO**	
	2	1		1					
	2	1			1				
	0								

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed Mar	Missed	Slippage	On track			
Information Management - Data Security Management March 2019 6 recommendations	0						2 recommendations (1medium; 1 high) have started and made significant progress and are running 3 months behind schedule, with 1 high risk running 6 months behind schedule. The recommendations have been impacted by the SOP review and Policy support BAU priorities. One recommendation regarding implementing an Email security classification solution has been is being rolled out incrementally across POlice Scotland and is therefore proposed for closure.	**ACC Professionalism & Assurance**	
	3	2		1					
	3	1	1	1					
	0								

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed Mar	Missed	Slippage	On track			
IT Application Review - SCOPE March 2019 5 recommendations	0						One remaining actions ongoing: * BCM/Disaster Recovery - Incremental approach preferred utilising recovery techniques (backup/restore). This is linked to the recommendation under the ICT Service Delivery Audit. This work was planned to take place w/c 20 April 2020, but further slippage projected as expectation that this work will be delayed until such time as the COVID-19 situation is resolved, given the need to have constant access to our HR / Duty Management systems, and the risk of causing interruption to service.	**CDIO**	
	3	2		1					
	2	2							
	0								

Internal Audit Recommendations Progress Tracker - Q4 March 2020

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

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed Mar	Missed	Slippage	On track			
Transformation Programme Assurance **June 2019** 6 recommendations (5 recs PS, 1 SPA)							1 high risk recommendation linked to PMO Agile Working. This forms part of the Benefits Management Strategy scheduled for the next PMG on 22/04/20, following approval it will proceed to Change Board on 05/05/20.	**Director of Change**	
	6	5			**1**				

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed Mar	Missed	Slippage	On track			
Stock Management **June 2019** 11 recommendations	**2**					2	Interim milestones achieved. Awaiting any impact on target dates in connection with Forensics. In progress part actions completed, for discussion with Internal Audit during Q4 Follow up. Slippage of rec 2.3 (KPI's) to May 2020.	**CFO**	
	5					5			
	4				1	3			
	0								

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed Mar	Missed	Slippage	On track			
IT Application Review - Efinancials and Asset 4000 **August 2019** 9 recommendations							2 actionspropo sed for closure regarding the development of the System Security Operating Procedures and improving Account Maintenance. 4 actions were not fully met at the end of March 2020 as follows: 1.1 Roles and Responsibilities (M) - partially met - now 30.4.2020 3.1 Creation of Roles **(H)** - complete pending implementation on the system - now 31.5.2020 3.4 User Access Reviews (M) - audit approach drafted but not implemented - now 30.4.2020 6.1 Business Continuity Testing (M) - was planned but not appropriate at this time due to risk of testing and other pressures on ICT as a result of COVID-19 - now 31.7.2020 1 recommendation planned for completion in December 2020 is at risk of delay. 4.1 Systems Authorisation (H) - dependent on P2P - at risk of further delay due to dependency on P2P which has paused.	**CFO**	
	3			1	1	1			
	5		2	3					
	1	1							

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed Mar	Missed	Slippage	On track			
Payroll ~NEW~ **December 2019** 4 recommendations							**~Not yet due~.**	**CFO**	
	4					4			

Audit Scotland Recommendations Progress Tracker - Q4 March 2020

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

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed Mar	Missed	Slippage	On track			
SPA Annual Audit Report (Interim) 2018/2019 July 2019 6 recommendations	0						Both recommendations relate to Payroll. Controls are in place for budget holders to validate headcount; one set of forms in use for both officers and staff. PB advised that he has confirmed with his team and Cathie McCauley's team that this action is not accurate and does not reflect the practice already in place. It is proposed to close the action 'no further action.	CFO DoPD	
	5								
	3	4	2						
	0								

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed Mar	Missed	Slippage	On track			
SPA Annual Audit Report (Final) 2018/2019 ~ NEW~ September 2019 4 recommendations							Section 22 report. P&D action relates to Strategic Workforce Planning.	CFO DoPD	
	4					4			

HMICS Recommendations Progress Tracker - Q4 March 2020

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

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed Mar	Missed	Slippage	On track			
Custody 2014 REOPENED **August 2014** **15 recommendations**	0						**March 2020** 3 recommendations open, closure forms all sent to HMICS previously however reopened on tracker as further information/evidence requested. Briefing paper regarding single cell policy (R02) submit Care & Welfare of Persons in Police Custody SOP to be sent which was reviewed and updated as a result of the briefing paper. Awaiting plan for ancillary centre inspections (R05), primary are ongoing then evidence can be sent in a closure form. Copy of estate strategy to be located and sent (R14). All hoping to be sent to HMICS in April 2020.	**ACC Local Policing + CJS**	
	5	4				1			
	5	4				1			
	5	4				1			

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed Mar	Missed	Slippage	On track			
Forensic Services to Victims of Sexual Crime **September 2017** **4 recommendations**							2 recommendations have been closed: R02 (Archway Service) confirmed as discharged by HMICS R09 (Cleaning of Police Premises) SOP signed off and line manager briefing sent out in January. 2 recommendations remain ongoing: R05 (healthcare facilities) remains a work in progress, anticipated all health boards will be compliant in the next few months, most of them are now fully functioning. Request for discharge once fully compliant. R10 (treatment of child suspects) this is challenging and not going to have a solution in the short term. This is to be discussed with HMICS at the next review opportunity.	**ACC Crime & Prevention**	
	2	1	1						
	2			2					

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed Mar	Missed	Slippage	On track			
Undercover Policing **February 2018** **19 recommendations**							Remaining three recommendations (01, 13 & 16) require further work in the next 3 months. R1 - Strategy and Implementation Plan - ongoing pending decision by SMT on direction. R13 - Substance Misuse Testing - ongoing pending decision by SMT on future policy. R16 - Integrated Record Management System - ongoing. System delivered did not fully meet requirements. Returned to supplier for further work.	**ACC Crime & Intel**	
	6	6							
	4	4							
	9	6		3					

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed Mar	Missed	Slippage	On track			
Firearms Licensing **March 2018** **24 recommendations**							3 Recommendations proposed for closure: R01 and R02 sent to HMICS for closure regarding the introduction of a performance framework and standards of service. 14 outstanding recommendations 7 are fully achieved but require sign off by the Head of Firearms Licensing. A further 3 are at an advanced stage of completion and will be submitted for closure shortly. 4 have dependencies with other Departments/Project and are currently impacted by Covid-19 redeployments/abstractions.	**ACC Professionalism and Assurance**	
	10		1	9					
	14	7	2	5					

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed Mar	Missed	Slippage	On track			
Call Handling **May 2018** **8 recommendations**	0						R02 (C3 procedures manual) sent to HMICS for closure. Remaining three recommendations discussed with HMICS w/c 2 March awaiting update on progress but likely that these can be closed at the next review based on the work understaken. Standards of Service (due to publish May/June 2020) Vulnerability Assessment - accelerated roll out due to Covid-19. Performance Management - advanced stage	**ACC LP North + C3**	
	0	4	1			3			
	0								
	0								

HMICS Recommendations Progress Tracker - Q4 March 2020

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

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed Mar	Missed	Slippage	On track			
Adult Support Protection Joint Inspection **June 2018** **16 recommendations**							It should be highlighted these actions are areas for improvement and learning identified during the Joint Inspection **but are not** specific recommendations made by HMICS. Police Scotland are keen to progress these matters to demonstrate our commitment to organisational learning. 1 area for improvement is complete with the reivew of an Adult Protection Co-ordinator role to identify and share best practice in relation to performance and quality assurance nationally. The outstanding areas of work require health checks undertaken in all hubs to ensure best practice around staffing, guidance, performance/demand management and quality assurance processes are in place and working well. This has been achieved for the Hubs in the East and North but work on completing health checks in the West Hubs has been put on hold meantime. This is replanned for completion end of May 2020.	**ACC Crime & Prevention**	
	1		1						
	11	4		7					
	4	2		2					

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed Mar	Missed	Slippage	On track			
Review of Custody Centres 2018 **August 2018** **7 recommendations**							4 recommendations remain open and 1 proposed for closure (R06-safeguarding children strip searches). 2 will be proposed for closure to custody SMT in March (R07 - publishing use of force data) and (R01 - custody estate strategy) provided a copy can be found. 2 remain open need revised completion dates (R02 system improvements) in liaison with Continuous Improvement Group working on progressing findings of reviews of custody centres to ensure consistency and (R05 guidance on training and risk assessments).	**ACC Local Policing + CJS**	
	4	1	1			2			
	3	1				2			

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed Mar	Missed	Slippage	On track			
Review of Delivery of the Policing Plan **March 2019** **12 recommendations**							A number of recommendations are proposed for completion. They were dependent on the revision of the Strategic Assessment and Annual Policing Plan. Other recommendations ongoing.	**Director of Business Integration**	
	11		8			3			

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed Mar	Missed	Slippage	On track			
LP+ Greater Glasgow Inspection **March 2019** **11 recommendations**							Actions ongoing	**ACC Local Policing West / Director of Business Integration**	
	11					11			

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed Mar	Missed	Slippage	On track			
Greater Glasgow Custody Inspection **June 2019** **5 recommendations**							4 recommendations remain open. 1 recommendation is proposed for closure (R04 Ancillary Centre Visits) a small cluster in the North need completed then evidence can be sent that Dec visits completed and June planned. Advised to push for this to happen in time for SMT. 3 remain open R01 custody queues - SLWG to be set up with support from Assurance and Improvement Group R03 approach to risk assessments work ongoing R05 quality assurance - partially complete - need confirmation on training then closure form can be sent.	**ACC Local Policing + CJS**	
	5		1			4			

HMICS Recommendations Progress Tracker - Q4 March 2020

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

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed Mar	Missed	Slippage	On track			
LP+ Events Inspection May 2019 15 recommendations	(red) (amber) **15** (green)		**3**		**12**		HMICS confirmed R02, 12 & 13 are all now discharged. R1, 8, 10 & 11 all relate to resourcing, workshops have taken place which has proposed a national process which requires a review by SLWG. R3 relates to impact of events, processes have been put in place and now need formalised into policy prior to sign off. R4 relates to event guidance for Commanders this has been sent out to Divisional Planners and Commanders for consultation and comment prior to sign off. R5, 6, 7 & 9 all relate to classification of events, SOPS relating have underwent an extensive review, guidance document published in April 2019. An amended document has gone through publication and awaits final sign off and publication. R14 relates to continuous professional training and development, a briefing paper has been collated and will be discussed at the next SMT. R15 relates to cost recovery, a full analysis of events and financial impact is underway and will be reported to SOSMR on 1st April 2020.	**ACC Operational Support**	(amber)

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
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Strategic Review of Custody May 2019 12 recommendations	(red) **12** (yellow) (green)	**2**	**1**			**9**	9 recommendations remain open. All recommendations are ongoing with achievable completion dates to be identified.	**ACC Local Policing + CJS**	(green)

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed Mar	Missed	Slippage	On track			
Online Child Sexual Abuse ~NEW~ February 2020 11 recommendations	(red) (amber) **10** (green)					**10**	New report added in quarter, meeting to develop action plan scheduled for 26 March 2020.	**ACC Crime and Prevention**	(green)

Information Commissioners Office Recommendations Progress Tracker - Q4 March 2020

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

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed Mar	Missed	Slippage	On track			
Information Commissioners Office 136 recommendations - 3 reports June 2016, September 2016 & December 2017	(red) **59** **26** **51**	**59** **25** **51**		**1**			The last remaining action relates to maintaining staff permission levels and access which will require significant investment of time and effort to implement and maintain. ICT are developing an options appraisal for internal (ICT) consideration by end April 2020. Propose to amend target milestone date to April 2020, paper to DMG.	**ACC Professionalism & Assurance**	(green)

Other Recommendations Progress Tracker - Q4 March 2020

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

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed Mar	Missed	Slippage	On track			
Mental Health Welfare Commission **September 2018** 1 recommendation	1 (red)						PS to examine the reasons for the significant variations is use of Place of Safety across Scotland. Action is being taken to ensure greater consistency and appropriate use of legislation. SharePoint site now rolled out and likely to result in closure of this recommendation.	**ACC Crime & Prevention**	(green)
	1 (amber)					1			
	(yellow)								
	(green)								

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed Mar	Missed	Slippage	On track			
Independent Football Review **March 2019** 18 recommendations	1 (red)	1					HM Chief Inspector of Constabulary in Scotland, was present at the Scottish Police Consultative Forum and spoke in complimentary terms of how she'd seen progress to meet the football review recommendations during their assurance inspection but had also seen subsequent progress in the months since then. 1 missed: R09 relating to the DFO model, NFIP Engagement and Assurance teams have begun proactively contacting and organising meetings with charity trusts and community projects across all Divisions in Police Scotland in conjunction with local DFOs. PS, NFIP-Scotland, met with the Supporters Direct Scotland SLO forum on 20 October to provide an overview of Police Scotland's structure and processes related to football. The presentation was provided to this group to explain the important police roles of DFO, Evidence Gathering Team, Event Policing Lead and Operational Planning teams. 2 slippage: R03 (media plan) marked for consideration at the next Football and Events Working Group (scheduled for 24 Mar 2020) with a view to having it discharged; & R05 (Counter-terrorism reviews and security) EERP Divisional Commander signed off the following as Police Scotland policy on 4 December 2019. 2 on track R04 (TTRO Management) & R07 (Training and Accreditation)	**ACC Local Policing West**	(amber)
	11 (amber)	11							
	6 (yellow)	1		3	1	1			
	(green)								

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
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Independent Review of Complaint Handling - Interim Report **June 2019** 12 recommendations	(red)						Proposal to close 3 recommendations:- linked to staffing composition (R3), consistent process (R6) and form simplification (R8).	**ACC Professionalism and Assurance** **DoPD**	(green)
	3 (amber)					3			
	6 (yellow)		1			5			
	6 (green)		2			4			

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed Mar	Missed	Slippage	On track			
Independent Advisory Group for Stop & Search **May 2017** 2 recommendations	(red)						IAGSS have made a number of recommendations within their 12 month review report however although PS will contribute to the execution, the recommendations are owned by Scottish Government.	**ACC Local Policing West**	(green)
	(amber)								
	(yellow)								
	2 (green)					2			

Internal Recommendations Progress Tracker - Q4 March 2020

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

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed Mar	Missed	Slippage	On track			
Cybercrime committed against Children (PS Audit) **July 2019** **2 recommendations**						2	Not yet due.	**ACC Professionalism and Assurance**	
	2								

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed Mar	Missed	Slippage	On track			
SWDF - Adoption, Maternity and Paternity Action Plan **July 2019** **4 recommendations**							Actions progressing and partially complete. For further discussion with Head of ER & Reward.	**DoPD**	
	4	1				3			

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
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Freedom of Information **November 2019** **6 recommendations**							4 improvement actions proposed for closure. They relate to improving the consistency of response times, recording clear audit trails, improving governance over follow up activity, and publishing responses in line requirements with the SOP. The last remaining action is due for completion by end of May 2020 and relates to considering developing a training module for FOI.	**ACC Professionalism & Assurance**	
	4		4						
	2	1				1			

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed Mar	Missed	Slippage	On track			
SCQF ~ NEW~ **February 2020** **5 Recommendations**							Actions not yet due but on track.	**DoPD**	
	3					3			
	2	2							

Internal Recommendations Progress Tracker - Q4 March 2020

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

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed Mar	Missed	Slippage	On track			
Employment Tribunal and Complaints Review ~ NEW ~ Date 7 Recommendations	(red)						Action Plan approved by P&D SMT (30/01/20) Steering Group to be established to progress actions (P&D; PSD and Legal Services). Plan and TOR presented and approved to PPMB (24/02/20).	**DoPD ACC Professionalism and Assurance**	(green)
	5					5			
	2					2			
	(green)								

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed Mar	Missed	Slippage	On track			
Review of Armoury, Jackton November 2019 6 recommendations	(red)						Actions not yet due.	**ACC Operational Support**	(green)
	1					1			
	(yellow)								
	5					5			

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed Mar	Missed	Slippage	On track			
EqHRIA ~ NEW~ February 2020 6 recommendations	(red)						Actions not yet due.	**ACC Crime and Prevention**	(green)
	3					3			
	3					3			
	(green)								

Title & Date of Publication	Risk Rating	No. Open & RAG					Comments	Owner(s)	Covid-19 Impact
		Total Closed	Closed Mar	Missed	Slippage	On track			
Complaints Six Stage Process ~NEW~ Novmber 2019 17 recommendations	(red)						New report added in quarter, links with Dame Elish Complaints Handling Report.	**ACC Professionalism and Assurance**	(green)
	(orange)								
	(yellow)								
	17					17			

Key Findings

- There is a risk that online child sexual abuse both as a form of child abuse and exploitation and cyber-enabled offending, may be lost within broader crime classifications
- The strategic direction of the force is unclear therefore staff are unable to link their operational activity to the overall aim
- There has been no overall strategic governance of the different parts of the force responsible for delivering different aspects of the response to online child sexual abuse
- There is an acknowledgement by Police Scotland that online child sexual abuse has not been given sufficient prioritisation
- Demand management, prioritisation and tasking weaknesses are symptomatic of governance and organisational structures that would benefit from a comprehensive review
- Specialist support functions need to refocus on those that are most in need of protection rather than their traditional focus on drugs and firearms
- Police Scotland can learn more from the experiences elsewhere through its strategic network
- Police Scotland has introduced effective processes to deal with National Online Child Abuse Prevention packages
- Police Scotland's response is generally reactive with very limited evidence of proactivity
- Local multi-agency child protection arrangements are robustly observed, including those occasions when national police resources are dealing with cases
- Police Scotland has different service delivery models in place to deliver overt operational activity in different areas of the country
- For Police Scotland to deliver on the transformational Cybercrime, Technical Surveillance
Programme of change, prioritisation and investment are required
- Police Scotland has taken no action towards achieving accreditation for digital forensics, nor has the issue of where the function is best located (Police Scotland or SPA Forensic Services) been resolved
- Prevention strategies are not being informed by organisational learning due to the absence of analytical products and the lack of evaluation means their effectiveness and impact are unclear
- Different funding arrangements are compounding silo working and having an adverse impact on the delivery of integrated, cohesive prevention work
- The absence of online covert activity by Police Scotland has created a proactive void that undermines any challenge to the legitimacy of Online Child Abuse Activist Groups (OCAG)

Recommendations

Recommendation 1

Police Scotland should improve the means by which recorded data can accurately inform assessment of the scale and nature of online child sexual abuse.

Recommendation 2
Police Scotland should review the level of analytical support provided to the Public Protection business area and consider the appointment of a dedicated analytical resource.

Recommendation 3
Police Scotland should ensure a strategic governance framework is in place, which provides support, direction, scrutiny and quality assurance to the force's response to online child sexual abuse.

Recommendation 4
Police Scotland should undertake an Online Child Sexual Abuse Strategic Threat Assessment to accurately identify the scale, nature and threat to children from online child sexual abuse.

Recommendation 5
Police Scotland should review the current arrangements for allocation of specialist support in relation to online child sexual abuse to ensure the allocation is fair, equitable and meets the needs across the country.

Recommendation 6
Police Scotland should review the resources and structure of the Internet Investigation Unit and Communications Investigation Unit to ensure that the force is able to meet current and future demand in relation to initial risk assessment, triage and intelligence development.

Recommendation 7
Police Scotland and the National Crime Agency should work together to ensure that all capabilities are being exploited to their full potential and intelligence is shared effectively.

Recommendation 8
Police Scotland should work with the Crown Office and Procurator Fiscal Service to establish a pragmatic and realistic approach to digital forensic examination requests.

Recommendation 9
Police Scotland should review its capacity and capability to conduct undercover online covert
operations in support of its policing priorities and ensure that undercover online operatives are sufficiently equipped and supported to identify and adequately assess the risk to children as a result of online offending.

Recommendation 10
Police Scotland should ensure that arrangements for deploying undercover online specialist resources are directed by formal tasking arrangements aligned to risk, priority and demand.