AUTHORITY

Item 6.2

Meeting	Scottish Police Authority –Complaints and Conduct Committee
Date and Time	25 November 2021
Location	Scottish Police Authority Headquarters
Title of Paper	Independent Review of Complaints Handling, Investigations and Misconduct Issues in Relation to Policing - Police Scotland Update
Presented By	ACC Alan Speirs, Professionalism and Assurance
Recommendation to Members	For noting

PURPOSE

The purpose of this paper is to provide the SPA Complaints and Conduct Committee with a summary of Police Scotland's progress on the recommendations from the final report of the Independent Review of Complaints Handling, Investigations and Misconduct Issues in Relation to Policing.

1 **BACKGROUND**

- 1.1 The final report of the Independent Review of Complaints Handling, Investigations and Misconduct Issues in Relation to Policing carried out by Dame Elish Angiolini (referred to hereafter as the Review) was published on 11 November 2020. Since this time, Police Scotland has been actively engaged with key partners, including Staff Associations, to assess and take action on the recommendations.
- The Dame Elish Strategic Oversight Group (DE SOG) chaired by ACC 1.2 Professionalism and Assurance has been established. This group is charged with progressing internal scrutiny in the management and discharge of Police Scotland recommendations in conjunction with Staff Associations, Professional Standards Department, People and Development and Risk, Assurance and Inspection team.

The DE SOG Terms of Reference is attached at **Appendix A**.

- 1.3 Police Scotland recommendations proposed for closure are submitted for consideration to the established DE Scottish Government Governance Framework - Practitioner Working Group; Strategic Oversight Board and Ministerial Group.
- In addition to the Scottish Government established governance 1.4 framework, Police Scotland have engaged with HMICS to provide an independent layer of assurance to ensure sufficiency of evidence for the closure of all recommendations.

2 **FURTHER DETAIL ON THE REPORT**

Summary of recommendations

2.1.1 The Review made 81 recommendations in total across a number of organisations. The table below summarises those that relate to Police Scotland.

Category	Total	Discharged*	Proposed Closed	Open
Police Scotland only	26	-	6	20

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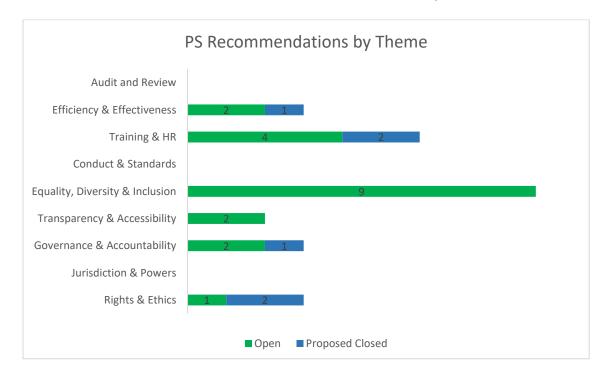
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Shared ownership (2) or Partner to Lead (8) - PS input	10	3	1	6
Requires Legislation	7	-	-	7

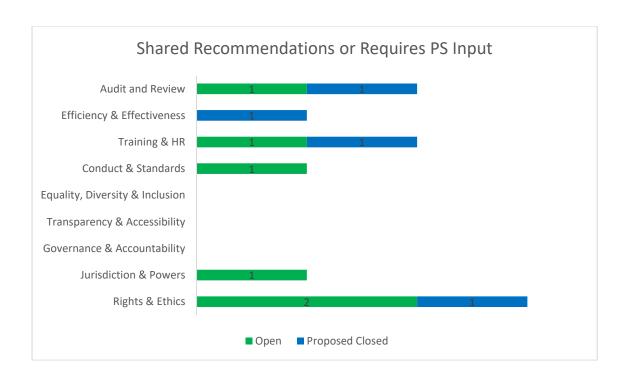
^{*}All recommendations are proposed closed and reported as such until a final decision on discharge is taken by the Ministerial Group.

Appendix B provides a summary of progress along with the current status. This refers to the 26 Police only recommendations and 2 recommendations where there is shared ownership.

2.1.2 Recommendations are tracked according to the 9 themes identified by Scottish Government. The following graph presents an overview of Police Scotland recommendations by theme.



2.1.3 The following graph shows recommendations where Police Scotland have a shared responsibility (2 recommendations – R65 & PR 27), have an input or will be impacted by delivery.



- 2.1.3 The Police Scotland Highlight Report for the reporting period May-September 2021 was completed and submitted to Scottish Government on 8th October 2021. As part of this submission, we have requested the closure of 7 recommendations:-6 Police Scotland only (3, 6, 9, 21, 33, 62) and 1 shared recommendation (65). As mentioned earlier, Police Scotland recommendations have been independently assured as complete by HMICS.
- 2.2 Summary of recommendations not for Police Scotland to lead.
- 2.2.1 Whilst not led by Police Scotland, the following recommendations are also being tracked in recognition of the Police Scotland footprint.

Rec No.	Summary Title	Owner	Target Date	Status	Theme
2	CAAP-D	Non PS Lead		Discharged	Audit & Review
13	PIRC access to Centurion database	Non PS Lead	n/a	Open	Jurisdiction & Powers
32	SPA Role in complaints	Non PS Lead	n/a	Open	Rights & Ethics
46	Direct Reporting to CAAP-D - Accountability and Publicity	Non PS Lead	n/a	Open	Training & HR
47	Police Assaults Referral to PIRC (Articles 3 &5)	PSD for impact assessment (not lead)	01.10.21	Open	Rights & Ethics
53	Recommendations based on Evidence from Other Jurisdictions	Non PS Lead	n/a	Open	Conduct & Standards
65	Training and Development Opportunities PIRC	Non PS Lead	n/a	Proposed Closed	Training & HR
70	Independent Custody Visitor Third Party Checks	Non PS Lead	n/a	Discharged	Rights & Ethics
80	Non statutory time limit for the submission of complaints by the public	Non PS Lead	n/a	Discharged	Efficiency & Effectiveness
PR27	Audit	Non PS Lead	n/a	Open	Audit & Review

3. FINANCIAL IMPLICATIONS

3.1 There are no direct financial implications associated with this paper. Costs associated with Police Scotland's response to the report are within current budget provision and additional funding is not requested at this stage.

4. PERSONNEL IMPLICATIONS

4.1 There are potential personnel implications associated with this paper in as much as the discharge of specific recommendations will on occasion

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impact on the Police Scotland workforce. This will be considered on a case by case basis and the appropriate and relevant assessments, consultation and communication completed.

5. LEGAL IMPLICATIONS

5.1 There are no legal implications associated with this paper.

6. REPUTATIONAL IMPLICATIONS

6.1 There are no direct reputation implications as a result of this paper. There are multiple reputational implications associated with our response to the recommendations in terms of complaint handling and equality and diversity. Such implications are not underestimated and Police Scotland is committed to working with key partners to deliver improvements to our complaint handling process and to maximise our organisational learning in respect of same as outlined in the main body of this report.

7. SOCIAL IMPLICATIONS

7.1 There are no social implications associated with this paper.

8. COMMUNITY IMPACT

8.1 There is no community impact associated with this paper.

9. EQUALITIES IMPLICATIONS

- 9.1 There are no direct equalities implications associated with this paper. There are multiple equality, diversity and inclusion implications associated with addressing the recommendations which are being assessed as part of the action planning process.
- 9.2. Police Scotland will engage with the Equality, Diversity, Inclusion & Human Rights (EDI & HR) Independent Review Group (IRG) to consider the IRG findings in respect of EDI activity.

10. ENVIRONMENT IMPLICATIONS

10.1 There are no environmental implications associated with this paper.

RECOMMENDATIONS

Members are invited to discuss the content of this report.

APPENDIX A - DE STRATEGIC OVERSIGHT GROUP TERMS OF REFERENCE



TITLE: DAME ELISH STRATEGIC OVERSIGHT GROUP TERMS OF

REFERENCE (ToR)

CHAIR: ACC PROFESSIONALISM AND ASSURANCE

VICE CHAIR: HEAD OF PROFESSIONAL STANDARDS DEPARTMENT

MEMBERS: SUPT COMPLAINTS NORTH – PSD

SUPT COMPLAINTS EAST – PSD CI POLICY COORDINATION – PSD

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STAFF ASSOCIATIONS – SPF and ASPS

SECRETARIAT - Professionalism and Assurance Staff Office

AUDIT MANAGER - Governance, Audit and Assurance

ATTENDING: Others attendees at discretion of Chair or as required by

specific agenda items.

QUORATE: The quorate for the Oversight Group is a simple majority of

Group members (including Chair / Vice-Chair) who must be present for the duration of the meeting. Representatives of core members who have been approved to attend will

contribute to quorate numbers.

PROCESS OWNER: TBC.

DECISION MAKER: Chair following member discussion.

PURPOSE:

To ensure that the Senior Executive have appropriate strategic oversight and direction surrounding the monitoring and coordination of progress and prioritisation of recommendations and to provide momentum to the Scottish Government Ministerial Group (MG) and Strategic Oversight Group (SOG).

The Oversight Group will provide a mechanism to facilitate key discussions, co-ordinate communications and will ensure full implementation of any organisational learning and improvement including consideration of any proposals for changes to current force policies, procedures and processes.

The formation of the oversight group reflects the scale and importance of the learning and commitment to improvement, which will focus on Serving the Public, Supporting Our People and Informing and Shaping Process, to enhance overall organisational efficiency and effectiveness and maintain public and partner trust and confidence in Police Scotland.

Other governance and engagement structures or meetings will be considered and convened as necessary to support the progression of the various work streams. This may include key partners to include, but not limited to, SG, COPFS and PIRC.

REMIT AND LEVELS OF APPROVAL: The role of the Oversight Group is to

provide overall PSOS accountability and governance over the implementation of recommendations, to set policy direction and overarching objectives, to seek assurance on progress and risks to the achievement of the improvement

recommendations and to approve PSOS publications about progress across all recommendations. The Oversight Group will also support decision making in relation to Human Rights, Values,

Ethical, Political, Financial or

Reputational Impact / Risk associated

matters relevant to the recommendations.

SECRETARIAT: Staff Office, ACC Professionalism and

Assurance

FREQUENCY: Monthly

REPORTING RESPONSIBILITIES: DCC Professionalism Board / COPFS / PIRC.

DELEGATES TO: Professional Standards Department

APPENDIX B - SUMMARY OF POLICE SCOTLAND RECOMMENDATIONS WITH CURRENT STATUS

Recommendation	Current Position / Achievements	Status	Theme
Prevention of post incident conferral other than for pressing operational reasons	Post Incident Procedures Professional Reference Group (PRG) continues to provide Police Scotland Senior Executive appropriate strategic oversight and direction to ensure effective PIP management and deployment. Post Incident Procedures (PIP) guidance and toolkit revised. Force-wide and additional communications issued to Contact, Command & Control Division (C3) in respect of PIP. PIP Professional Reference Group and Police Scotland internal Practitioner Working Group established and Terms of Reference agreed.	Proposed Closed	Rights and Ethics
Police Scotland performance report to identify 5 year trends.	The Quarter 1 Report for 2021 submitted to the SPA Complaints & Conduct Committee included 5 year trend analysis which will be developed incrementally as the relevant data is available. It is anticipated that reports to the end of this financial year will ensure finalisation of this recommendation.	In Progress	Governance and Accountability
Police Scotland and SPA to consider expanding collection and publication of diversity data	Analysis and Insights report produced for newly appointed staff and promotion process. Working group has also been established to progress data analysis and insights going forward. At strategic level, work is ongoing in respect of developing EDI measures and insights data which align to performance reporting, and also to identify any gaps/additional EDI measures and insights required to	In Progress	Equality, Diversity and Inclusion

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Recommendation	Current Position / Achievements	Status	Theme
	evidence the impact of the work that is under way at a national, regional and local level. SPA is currently undertaking a review of online forms (including equality and diversity) as part of a wider review of SPA digital presence. PIRC has also introduced a process to collect diversity data which will form part of the information collected in relation to allegations of criminality that are investigated by PIRC. Work is also ongoing to include diversity monitoring as part of PIRC's recruitment process.		
All officers and support staff in Police Scotland's Professional Standards Department (PSD) to receive comprehensive induction training and regular refresher development.	A comprehensive 5-day induction training package was carried out and one-day course has been developed to provide training for new staff members. A refresher training programme has also been established, with Continued Professional Development events taking place on a regular basis. Professional Standards department Training Working Group and Training cadre has also been established, comprising PSD staff, providing development and enhancing training programmes. All training is supported with significant ongoing input from both PIRC & CAAPD.	Proposed Closed	Training and HR
9	New revised Frontline resolution (FLR) process	Proposed	Efficiency and
All frontline resolution should be	commenced on 3rd May 2021, in order to broaden the opportunities where FLR can be used. FLR has been	Closed	Effectiveness

Recommendation	Current Position / Achievements	Status	Theme
carried out by Professional Standards Department	revised in conjunction with the new complaint handling process, including the creation of the National Complaint and Resolution Unit (NCARU) which facilitates the requirement for all FLR to be dealt with by Professional Standards department.		
Police Scotland to consider front line sergeant workload at and supervisory ratio of sergeants to constables	Rank ratios have been analysed across Police Scotland with findings presented at Corporate Finance and Performance Board where it was identified that there were significant differences across the Force. Divisional Commanders were tasked with reviewing their rank ratios in line with DEA recommendations using Strategic Workforce Planning methodologies and present their findings back to Strategic Workforce Planning team. Findings from this exercise are still being collated and once this is achieved an options paper will be presented November/December 2021 for decision.	In Progress	Training and HR
Police Scotland Executive team should consider in depth and review the criteria and competencies that it uses to assess police officers' readiness for promotion.	Awaiting Sign Off - The new promotion process has been implemented across all ranks and the framework underpinned by the Competency and Values Framework (CVF). This will be subject to both internal review and review by HMICS. Evidence of impact is now awaited.	In Progress	Training and HR

Recommendation	Current Position / Achievements	Status	Theme
Police Scotland to use staff surveys, meetings and focus groups to understand the experience and impacts of discrimination, prejudice and unconscious bias on all minority groups in the workforce	Your Voice Matters (YVM) results have been shared with the Survey Steering Group and the Diversity Network Chairs to ensure that any reflections or areas of concern are included within the organisational Improvement Plan. A draft Improvement Plan has been developed and will be circulated to Survey Steering Group and Diversity Staff Associations for their review and input prior to being presented through normal governance channels. Work is ongoing through the EDI & HR SOB to engage internal and external stakeholders in shaping positive, effective, sustainable change; providing opportunities for feedback whilst identifying and sharing best practice across the organisation.	In Progress	Equality, Diversity and Inclusion
16 More diverse panels for disciplinary hearings	Police Scotland are currently reviewing the existing cadre of chairs and assessors for misconduct proceedings and analysis is being undertaken to establish the diversity of this cadre to ensure diverse panels can be put in place. SPA will ensure, as far as possible, the diversity of Police Appeals Tribunals.	In Progress	Equality, Diversity and Inclusion
Appropriate support for anyone who is subject to internal or external discrimination	Work continues to be progressed and discussion has taken place with Independent Office for Police Conduct (IOPC) in respect of discrimination training for use by Police Scotland. At a strategic level, work is also ongoing through EDI &HR SOB to engage internal and external stakeholders	In Progress	Equality, Diversity and Inclusion

Recommendation	Current Position / Achievements	Status	Theme
	in shaping positive, effective, sustainable change; providing opportunities for feedback whilst identifying and sharing best practice across the organisation.		
Independent review of equality matters within Police Scotland	Equality, Diversity, Inclusion & Human Rights (EDI & HR) Independent Reference Group (IRG) established to provide critical oversight, challenge, review and assurance. IRG have reported to the SPA Board in February 2021, and in September. The IRG is anticipated to be in place between 12-18 months with a final report to the SPA Board anticipated in September 2022 and will provide informed scrutiny of Police Scotland's EDI activity by offering expertise, guidance, critical oversight, challenge, review and assurance with a focus on the 3 key areas of Cultural Change; Strategic Direction and Training and Development. The IRG will engage with members of the EDI &HR SOB and Police Scotland to enhance the identification of risk and provide insight on effective mitigation measures. Police Scotland will develop an improvement plan in response to the recommendations identified in HMICS Inspection Report into Police Scotland's Training and Development - Phase 2 Equality and Diversity.	In Progress	Equality, Diversity and Inclusion

Recommendation	Current Position / Achievements	Status	Theme
Police Scotland should develop its diversity data collection and analysis to inform a proper understanding of issues related to discrimination	Arrangements for the gathering and storage of diversity complaints data being explored, to include data governance arrangements and system development needs for the storage of PSD diversity data on Police Scotland SCoPE system. At a strategic level, this links into the work is also ongoing through EDI &HR SOB to identify any gaps/additional EDI measures and insights and also the engagement with internal and external stakeholders in shaping positive, effective, sustainable change; providing opportunities for feedback whilst identifying and sharing best practice across the organisation engagement with Diversity Staff Associations.	In Progress	Equality, Diversity and Inclusion
Police Scotland to review and audit whistleblowing arrangements and data	Whistleblowing Guidance has been revised and significant training and awareness sessions provided on various platforms. Self-assessment process established to effectively manage and audit processes, with benchmark undertaken in June 2021 to identify areas of improvement and presented to the SPA Audit, Risk and Assurance Committee (ARAC). Guidance will be reviewed annually, with enhanced engagement in terms of Whistleblowing awareness to be included in established supervisory and leadership training and the feedback process established to ensure improvement opportunities captured. Bi-annual reports will be submitted to SPA. Although this recommendation is aimed primarily at Police Scotland, the SPA has also	Proposed Closed	Rights and Ethics

Recommendation	Current Position / Achievements	Status	Theme
	made arrangements for annual reporting on its whistleblowing policy to the ARAC, with the report submitted in July 2021.		
Local scrutiny committees to consider what further complaints information or discussion would assist their scrutiny of the police	The Professional Standards Department monthly Divisional Commanders' Report has been redesigned to be more reflective of the SPA Complaint & Conduct Committee quarterly report. All Commanders have provided confirmation that the redesigned report meets the needs of their local scrutiny committees at divisional level.	Proposed Closed	Governance and Accountability
48 Police Scotland to publicise right to complain	Work continues to ensure that the system is fair, accountable, transparent and accessible for a complainer to effectively navigate the complaints process. This work included the establishment on 11 October 2021 of a QR Code which will provide the public with enhanced accessibility to the Police Scotland Complaint Section on the website. The QR Code will be widely available to the public, officers and staff to facilitate immediate access to the complaint section on the Police Scotland website. Extensive consultation with SPA, PIRC, HMICS, CAAPD, Scottish Youth Parliament, ASPS & SPF has all been fully supportive. Professional Standards web pages have also been revised in support of this.	In Progress	Transparency and Accessibility

Recommendation	Current Position / Achievements	Status	Theme
49 Know your Rights section of the Police Scotland website to be improved	Review of Police Scotland's website is ongoing. Consultation has now taken place with Youth Parliament and, as noted at recommendation 48, a QR Code was established in October, providing the public with enhanced accessibility to the Police Scotland Complaint Section on the website.	In Progress	Transparency and Accessibility
Third-party reporting centres for hate crime, including those representing minority groups, to offer support to complainers.	Work is being progressed by Police Scotland's Partnerships, Preventions & Community Wellbeing Division. The action links to wider improvements for third party reporting as per recommendation 6 of HMICS Hate Crime Inspection. At a strategic level, this also links into the work is also ongoing through EDI &HR SOB and the EDI Service Delivery Sub Group in relation to Hate Crime. The EDI & HR SOB were provided in September, with a Hate Crime Overview of priority activities being undertaken to minimise risk to our vulnerable groups and enhance public reassurance.	In Progress	Equality, Diversity and Inclusion
Police Scotland to analyse complaints data to gain a better understanding of different groups and communities'	Enhancements required to demographic data recording currently being explored by Police Scotland, working closely with PIRC and SPA. This work is being taken forward jointly by Police Scotland's Professional Standards and People and Development departments.	In Progress	Equality, Diversity and Inclusion

Recommendation	Current Position / Achievements	Status	Theme
experience of the			
police			
61	A self-assessment process has been established within	In Progress	Audit and
Police Scotland and	Police Scotland's Professional Standards department.		Review
the PIRC to consider	PIRC has also had meetings with Audit Scotland and		
drawing on expertise	SPSO who are content to assist PIRC with methodology		
of Audit Scotland and	guidance. Audit Scotland has agreed to provide an		
SPSO in re-designing	input to Review staff and regular meetings are now		
the audit	scheduled.		
arrangements for			
police complaints.			
62	Training officer appointed in National Support,	Proposed	Training and HR
Police Scotland to	Partnerships and Prevention Unit (NSPPU) with	Closed	
appoint a PSD	responsibility for coordination of all training across PSD		
training officer to	business areas. Joint training now takes place on a		
liaise with the SPSO,	regular basis.		
the PIRC and the			
SPA on joint training,			
best practice.	T 1100 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		-
65	In addition to joint training already delivered by PIRC	Proposed	Training and HR
PIRC and Police	and Police Scotland, further training has been delivered	Closed	
Scotland to develop	at the Scottish Police College, SPA and Police Scotland		
training and	Professional Standards department. The delivery of the		
development	'Learning Point' publication also provides a medium for		
opportunities to	capturing and sharing learning that has been identified		
embed learning from	through PIRC investigations and complaint handling reviews. This has been embedded in 'business as usual'		
	reviews. This has been embedded in business as usual		

Recommendation	Current Position / Achievements	Status	Theme
thematic analysis of	processes and will provide a foundation for theoretical		
complaints	learning to be shared and embedded in practical		
(Shared Ownership)	Policing operations.		
66	Unconscious Bias continues to feature throughout Police	In Progress	Equality,
All Police Scotland	Scotland Training. Insert for Operational Safety Training		Diversity and
officers and staff to	on Unconscious Bias in the tactical environment is		Inclusion
receive training on	currently out for consultation with staff associations.		
unconscious bias,	PIRC also continues to undertake work to identify any		
equality legislation	further appropriate training in this regard. The Senior		
and diversity with	Management Team have taken part in Unconscious Bias		
refresher courses	training with PSD and have rolled out an online module		
	to staff.		
67	Awaiting Sign Off - National mental health aide	In Progress	Training and HR
Police Scotland to	memoire under consultation. Training currently online		
provide training on	and officer safety training to be reviewed. Input has		
engaging with	been designed and is presently being finalised with		
individuals displaying	Mental Health leads for Operational Command Training		
mental ill-health	(newly promoted sergeants) on Leading Mental Health		
symptoms or related	Incident, including best practice on leading incidents,		
behaviours.	detention, warrants, risk assessment and accessing		
	treatment. PIRC staff have also completed mandatory		
	training in relation to engaging with those who have		
	experienced trauma and we have received training		
	inputs from Mental Health First Aiders. The Senior		
	Management Team have taken part in Unconscious Bias		
	training with Professional Standards department and we		
	have rolled out an online module to staff. Further		

Recommendation	Current Position / Achievements	Status	Theme
	appropriate training is being identified. Operationally, PIRC also record the vulnerabilities of complainers to inform our work.		
Any restricted duties or transfers imposed for the duration of an investigation should take into account, where appropriate, the individual's family circumstances, and subject officers or staff should be offered the opportunity to access appropriate support services provided by Police Scotland.	Awaiting Sign Off - Additional internal consultation delayed approval of the Investigative Wellbeing guidance. The Investigations Wellbeing and Employee Safeguarding Process and Guidance has now been approved by People and Professionalism Board and received final sign off at Senior Leadership Board on 20th October 2021.	In Progress	Rights and Ethics
78 Chief Constable to publish annually Police Scotland's performance in handling complaints	Annual reporting on Police Scotland's complaints handling performance will be available at the end of financial year 2021/22.	In Progress	Governance and Accountability

Recommendation	Current Position / Achievements	Status	Theme	
against timescales in				
statutory guidance				
The fo	The following recommendations remain open from the Preliminary Report			
PR3 Police Scotland to consider for employing more non-police officer support staff in PSD. This is an option that Police Scotland may wish to ask HMICS to review.	Professional Standards department (PSD) are engaged in a Force wide strategic workforce planning exercise directly examining the composition of the workforce on a needs analysis basis. Resourcing of PSD in the area of complaint handling will form part of that analysis. Commitment and progress to Organisational Design, Resources and Demand and Organisational Resilience as Organisational priorities will be included in reporting on Annual Policing Plan 2021-22.	In Progress	Training & HR	
PR11 Police Scotland to accelerate plans to expand use of Body Worn Video	Police Scotland has completed the rollout of BWV to armed officers for the COP 26 conference. A document set including Standard Operating Procedure and Code of Practice have been compiled and published on the PS intranet pages in line with the recommendations of the Justice Sub-Committee on Policing on the use of remote piloted aircraft systems and body worn video cameras.	In Progress	Efficiency and Effectiveness	

Recommendation	Current Position / Achievements	Status	Theme
	Further public engagement activity and focus groups is currently being carried out involving interviews with a cross section of society from all age groups, people with disabilities, minority ethnic groups and representatives from communities across Scotland to inform the development of a national code of practice for the future use of body cameras by Police Scotland.		
	The BWV Project Team have carried out initial work in respect of roles which could be considered for body worn cameras and the associated costs for a national rollout. The full costs will be developed as part of the standard business case process, inclusive of a full tender exercise.		
PR27 (x-ref with R42) All audit arrangements, including regular dip-sampling, to be prioritised and co-ordinated to	This links to work undertaken for recommendation 42. The National Complaint Handling Development Group continues to progress arrangements for an annual multi-agency audit of Police Scotland's complaint handling involving the SPA, Police Scotland and the PIRC.	In Progress	Audit and Review
improve standards and service to the public (Shared ownership)	Police Scotland has also developed an internal Quality Assurance process and methodology which are now in place. It is anticipated that the first audit will be completed during 2021/22.		