

Meeting	Audit, Risk and Assurance Committee
Date	28 January 2021
Location	Video conference
Title of Paper	Management Response to COVID-19 Internal Audit Report
Presented By	Gary Devlin, Partner, Azets
Recommendation to Members	For Discussion
Appendix Attached	Management Response to COVID-19 Internal Audit Report

PURPOSE

This paper presents our final report on the review of Management Response to Covid 19.

The paper is presented for the Audit Committee to consider the report, findings and management responses.

The paper is submitted for discussion.

1. BACKGROUND

- 1.1 All organisations have needed to act decisively in response to COVID-19 to enable core operations to continue with minimal disruption. Police Scotland has endeavoured to maintain key services and enable as many staff to continue to work as effectively as possible, whilst also responding to new policing response requirements. As at June 2020, Officers of Police Scotland had engaged with the public under the requirements of COVID-19 legislation approximately 51,000 times, and Police Scotland itself had committed over £11m of additional expenditure related to COVID-19, including £3.61m in relation to Personal Protective Equipment (PPE).
- 1.2 This review has considered the approach to the transition to this new operating environment and any lessons that may be learned in comparison to other organisations.
- 1.3 In a change to the 2020/21 audit plan, we have reviewed the approach taken by Police Scotland to undertake the initial response to COVID-19. The review considered the key COVID-19 response decisions made by Police Scotland including the impact of revised working practices, associated procurement spend, tendering arrangements and other staffing costs. It should be noted that this audit did not cover operational policing matters, the IAG, or Forensic Services.

2. FURTHER DETAIL ON THE REPORT TOPIC

- 2.1 The COVID-19 pandemic has required unprecedented changes to how Police Scotland manage and deliver its core services.
- 2.2 We have confirmed that Police Scotland acted quickly and effectively to ensure key areas of businesses could continue. Through Operation Talla, key business decisions have been monitored, critical risks arising from the pandemic identified and Scottish Government guidance adhered to. As well as responding to the pandemic, Operation Talla introduced a forum to investigate and collate areas of good practice and learning opportunities to ensure the organisation can respond dynamically to any future COVID-19 related changes.

- 2.3 We have identified three minor issues that Police Scotland should consider in responding to future pandemic scenarios.

3. FINANCIAL IMPLICATIONS

- 3.1 The Internal Audit Report considers the impact our review findings may have on organisational risk registers. Committee members should consider this section when considering the overall implications of our findings.

4. PERSONNEL IMPLICATIONS

- 4.1 The Internal Audit Report considers the impact our review findings may have on organisational risk registers. Committee members should consider this section when considering the overall implications of our findings.

5. LEGAL IMPLICATIONS

- 5.1 The Internal Audit Report considers the impact our review findings may have on organisational risk registers. Committee members should consider this section when considering the overall implications of our findings.

6. REPUTATIONAL IMPLICATIONS

- 6.1 The Internal Audit Report considers the impact our review findings may have on organisational risk registers. Committee members should consider this section when considering the overall implications of our findings.

7. SOCIAL IMPLICATIONS

- 7.1 The Internal Audit Report considers the impact our review findings may have on organisational risk registers. Committee members should consider this section when considering the overall implications of our findings.

8. COMMUNITY IMPACT

- 8.1 The Internal Audit Report considers the impact our review findings may have on organisational risk registers. Committee members should consider this section when considering the overall implications of our findings.

9. EQUALITIES IMPLICATIONS

9.1 The Internal Audit Report considers the impact our review findings may have on organisational risk registers. Committee members should consider this section when considering the overall implications of our findings.

10. ENVIRONMENT IMPLICATIONS

10.1 The Internal Audit Report considers the impact our review findings may have on organisational risk registers. Committee members should consider this section when considering the overall implications of our findings.

RECOMMENDATIONS

Members are requested to discuss the report.



Scottish Police Authority

Internal Audit Report 2020/21

Management response to COVID-19

October 2020



Scottish Police Authority

Internal Audit Report 2020/21

Management Response to COVID-19

Executive Summary	1
Key findings	3
Management Action Plan	6
Appendix A – Definitions	13
Appendix B – Summary of management actions	14

Audit Sponsor	Key Contacts	Audit team
<i>David Page, Deputy Chief Officer</i>	<i>James Gray, Chief Financial Officer Kirsty Stanners, Finance Business Partnering Lead Iain McKie, Head of Procurement Susan Beaton, Head of People Services Donna Adam, Audit Manager</i>	<i>Gary Devlin, Relationship Partner Elizabeth Young, Head of Internal Audit Sasha Sheppard, Lead Internal Auditor Matthew Robson, Internal Auditor</i>

Executive Summary

Conclusion

The COVID-19 pandemic has required unprecedented changes to how Police Scotland manage and deliver its core services.

We have confirmed that Police Scotland acted quickly and effectively to ensure key areas of businesses could continue. Through Operation Talla, key business decisions have been monitored, critical risks arising from the pandemic identified and Scottish Government guidance adhered to. As well as responding to the pandemic, Operation Talla introduced a forum to investigate and collate areas of good practice and learning opportunities to ensure the organisation can respond dynamically to any future COVID-19 related changes.

We have identified three minor issues that Police Scotland should consider in responding to future pandemic scenarios.

Background and scope

All organisations have needed to act decisively in response to COVID-19 to enable core operations to continue with minimal disruption. Police Scotland has endeavoured to maintain key services and enable as many staff to continue to work as effectively as possible, whilst also responding to new policing response requirements. As at June 2020, Officers of Police Scotland had engaged with the public under the requirements of COVID-19 legislation approximately 51,000 times, and Police Scotland itself had committed over £11m of additional expenditure related to COVID-19, including £3.61m in relation to Personal Protective Equipment (PPE).

This review has considered the approach to the transition to this new operating environment and any lessons that may be learned in comparison to other organisations.

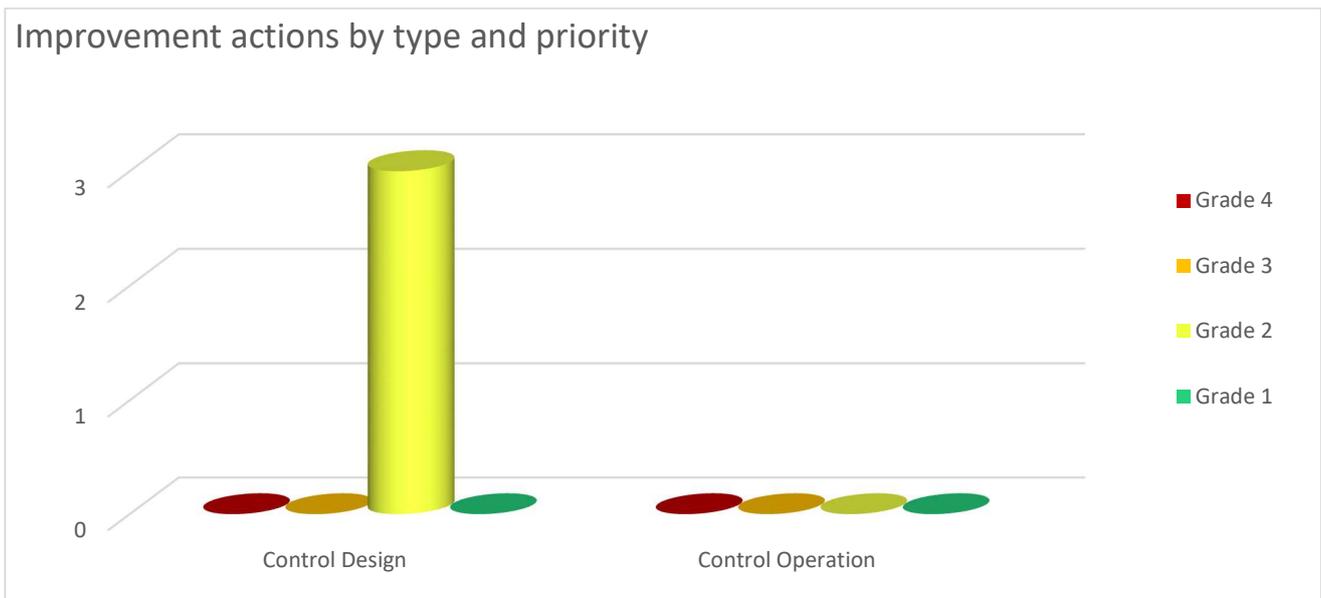
In a change to the 2020/21 audit plan, we have reviewed the approach taken by Police Scotland to undertake the initial response to COVID-19. The review considered the key COVID-19 response decisions made by Police Scotland including the impact of revised working practices, associated procurement spend, tendering arrangements and other staffing costs. It should be noted that this audit did not cover operational policing matters, the IAG, or Forensic Services.

Control assessment

- 1. Police Scotland has considered the impact of home working on business operations and on staff, ensuring appropriate arrangements have been put in place to support all staff to work effectively
- 2. Appropriate procurement practices have been employed during COVID-19 that comply with Scottish Government guidance and the relevant Scottish Procurement Policy Notes issued to cover this period
- 3. Additional spending relating to COVID-19 response has been accurately captured and appropriate governance arrangements are in place to scrutinise this
- 4. Changes made to governance and internal control have been captured, reviewed and where appropriate, additional risks escalated
- 5. A lessons learned exercise has been carried out, with actions arising being documented, assigned owners and target dates for implementation set



Improvement actions by type and priority



Three improvement actions have been identified from this review, all of which relate to the design of controls. See Appendix A for definitions of colour coding.

Key findings

Our sample testing of procurement activity included instances of purchases and contract awards carried out prior to the development and implementation of specific purchasing processes and guidance applicable to the COVID-19 pandemic response. While these initial purchases were correctly presented for authorisation in line with delegated authority limits, the scrutiny and challenge of these purchases contributed to the development of revised procurement processes which provide for greater detail and justification of specific purchases. In some cases, purchases and contract awards have been subject to retrospective approval in line with those revised procurement processes and Scottish Government guidance to Accountable Officers. We have assessed these instances based on the information available at the time, and confirmed that any retrospective scrutiny has been applied, where applicable.

The unprecedented nature of the pandemic means that additional procurement was conducted at speed, in an environment in which supply of certain critical products was constrained and applicable guidance under constant revision. We have noted instances where operational officers and staff, procurement staff, and procurement authorisers were required to balance operational need with the ability to secure those supplies and the achievement of best value. For example, our sample included the procurement of 60,000 Medical Isolation Eye Masks (goggles) at a unit cost of £9.30. Our review of this purchase noted that it occurred in March prior to the introduction of Scottish Government Procurement Guidance or Police Scotland internal guidance relating to COVID-19 procurement. Review of Police Scotland's internal correspondence found that the operational area requesting this equipment indicated that this was a critical requirement, and that the procurement team were of the opinion that this equipment would shortly become unavailable and/or increase in price. We understand that the assessment of the quantity required was initially based on guidance stipulating that the goggles must be treated as single use as an infection control measure, however this was subsequently revised such that goggles could be reused, resulting in an overstock. In circumstances such as these we have considered whether sufficient and relevant information was made available to purchase authorisers and did not identify any issues.

We also noted that Police Scotland still has challenges around stock management, as explored more fully in our 2019/20 Stock Management audit. These include the absence of an overarching stock management system, and consequently reporting controls that are not adequate to allow for real time, or near real time monitoring of stock levels. Though the recommendations raised in our 2019/20 report have been addressed on an interim basis pending a programme of work implemented as a component of the Procurement Improvement Plan, the poor control environment has impacted on the management of COVID-19 related stock, as with other stock held by Police Scotland. Police Scotland continue to work towards the implementation of the Procurement Improvement Plan and so we have not replicated the work previously performed in this area.

Good practice

Police Scotland's procedures reflect good practice in a number of areas:

- Police Scotland acted quickly to identify the need for, and to introduce, working from home guidance. Each business area undertook a prioritisation exercise using centrally issued guidance to protect business critical processes, with risks monitored through the Operation Talla risk register. IT service requests were triaged to prioritise business critical job roles.

OFFICIAL

- The Procurement team created specific Operation Talla Procurement Guidance based on Scottish Government Accountable Officer Guidance and Scottish Procurement Policy Notes (SPPNs) 4 and 5 and issued to relevant staff early in the pandemic response. This set out the procurement routes and approvals that would be required during the pandemic. We confirmed full compliance with the procurement guidance in place at the time during our sample testing. The Scottish Government issued two further SPPNs and we confirmed that Police Scotland considered and acted upon these timeously, including extending the current Procurement Strategy the end of 2020/21.
- The Finance team have undertaken two key pieces of budgetary forecasting to estimate the overall impact of the COVID-19: a high-level review of material budget lines in May and the Q1 budget forecast carried out in June. These identified immediate actions and potential savings to offset against an expected loss of income and mitigate the overall budget deficit.
- Operation Talla established an Organisational Learning Group to assess the lessons learned and best practices that can be integrated into business as usual organisational processes. The group considered the input of a variety of internal and external stakeholders, and the management actions and governance changes implemented as part of the COVID-19 response.

Areas for improvement

We have identified three minor areas for improvement that would strengthen Police Scotland's control framework. These include:

- Reviewing the supplemental HR guidance issued and ensuring that it is either incorporated into updated HR policies or that there is a clear review date set to consider its removal;
- Tracking the completion of locally owned COVID-19 response action plans; and
- Ensuring that queries issued to critical suppliers in order to assess the risk of interruption of supply require a response and are recorded.

These are further discussed in the Management Action Plan below.

Impact on risk register

Police Scotland's corporate risk register (dated September 2020) included the following risks relevant to this review:

- ORR080 – Health and Safety Non-Compliance (Score 12)
- ORR122 – Pandemic Illness (Score 20)
- ORR128 - Organisational Spend - Procurement Oversight and Control (Score 9)

We considered the procurement arrangements in place within Police Scotland specifically within the context of the COVID-19 pandemic and the associated guidance issued by the Scottish Government. We did not identify any issues that suggest this guidance has not been complied with. We note, however that the scoring of these risks remains out of appetite as at the last meeting of the SPA Audit, Risk and Assurance Committee.

Acknowledgements

We would like to thank all staff consulted during this review for their assistance and co-operation.

Management Action Plan

Control Objective 1: Police Scotland has considered the impact of home working on business operations and on staff, ensuring appropriate arrangements have been put in place to support all staff to work effectively.



Yellow

1.1 HR policies

Prior to the national lockdown in March, homeworking was not standard practice within Police Scotland and was discouraged due to perceived security risks. When the Scottish Government issued guidance that all those that could work from home should, Police Scotland developed and issued organisational guidance in response. Business areas then identified posts suitable for home working.

A Smarter Working Short Life Working Group was convened, which produced and made available a Smarter Working Toolkit pending the development of a formal policy. This provides guidance for people managers introducing and managing home working arrangements, outlines approaches to flexibility that can be implemented informally, and sets out a process for formal flexible working applications where there are contractual or business limitations. A new Homeworking Policy is currently under development, and at time of the audit was undergoing impact assessment ahead of formal consultation starting by the end of September.

Police Scotland has issued guidance in several key areas impacted by home working, and in some areas these supersede the content of existing HR policies. As an example, the current Absence Management policy requires staff to supply a fit note if their absence lasts longer than seven days but this policy is not currently applied in relation to staff that are required to self-isolate. Similarly, the practical application of entitlements around special leave have also changed to take into account provisions such as child-care and the requirement by the government to isolate through the Test and Protect procedure. These scenarios are captured in specific COVID-19 guidance issued to staff but conflict with HR Policies as written.

HR policies are subject to a programme of planned review, and we understand that at present there is no intention to revise existing policies out of cycle. However, there is a lack of clarity as to whether guidance that has been issued in response to COVID-19 are intended as permanent adaptations to the HR policies, or whether it is intended to be applied only for the duration of the pandemic.

Risk

There is a risk that staff are unable to determine when and if COVID-19 related guidance applies, where this conflicts with existing HR policies. This could be particularly true in the event of local lockdowns or other restrictions across Scotland. This could result in staff being unaware of their rights and responsibilities or not complying with the relevant HR policy.

Recommendation

We recommend that Police Scotland carry out a review of HR policies to identify instances where the approved policies may not be applied as written due to decisions that have been made in response to the COVID-19

pandemic. Police Scotland should then consider whether any of the adjustments may be considered useful for future scenarios and therefore should be incorporated into an updated policy, or will expire within the short term and therefore be removed.

Where guidance is considered short-term, this should be recorded and a date of review established for the guidance to ensure that it is removed as soon as appropriate. Where additional guidance is considered useful for the longer-term, HR should ensure that any policy updates should go through the usual approval process including appropriate consultation with employee representatives and trade unions.

Finally, it is important that HR clearly communicate both scenarios to both people managers and their direct reports so that everyone understands the HR provisions that are currently in place.

Management Action

Grade 2
(Design)

On the point of communicating changes, the Line Management brief does this regularly. We have had feedback from staff on its effectiveness and this will continue to be used to communicate short term changes to policy.

We have put in place a robust process to comprehend and understand local lockdown implications. Clear and consistent messaging has been provided that the first point of call for manager advice and guidance is People Direct – this allows us to guide managers in local situations through the right process for their circumstances at that particular time.

On the matter of policy reviews, we have a priority list for policy changes based on the criticality of some of the work we are doing round promotions that needs to be prioritised first. We will review the point about undertaking wider reviews as soon as we have other critical time dependent work out of the way.

Action owner: Director of People & Development

Due date: April 2021

1.2 Locally owned action plans

In the initial stages of the COVID-19 response, the Operation Talla People and Development Lead provided local business areas with guidance which required the development of local action plans to address specific risks. This included requiring management to identify and prioritise business critical roles for the issue of equipment to enable home working, and to identify adaptations to premises required to support infection control and physical distancing.

We have not been able to evidence that all business areas expected to develop such plans did so in a timely manner.

Risk

There is a risk that actions intended to address the early issues identified during the COVID-19 response were not implemented in all business areas, potentially leading to localised instances of failure to address COVID-19 specific risks to operational resilience or business continuity. This may result in localised disruption to the delivery of Police Scotland's services in those areas.

Recommendation

Police Scotland should ensure that policies and procedures require that where local areas are required to develop action plans, a process is put in place to ensure that all areas complete such plans on a timely basis. This should include the provision of a nil return where no required actions are identified.

Management Action

Grade 2
(Design)

The HR Business Partners, who acted as liaison from P&D with local areas, do have a process in place for collating nil returns. We will highlight the continued requirement for this as part of reporting to ensure that any future similar requests have a means of demonstrating clearly that the activities were complete.

Action owner: Director of People & Development

Due date: Complete

Control Objective 2: Appropriate procurement practices have been employed during COVID-19 that comply with Scottish Government guidance and the relevant Scottish Procurement Policy Notes issued to cover this period.



2.1 Contacting Critical Suppliers

The Police Scotland Procurement Team carried out a risk analysis to identify those suppliers critical to continued operations. The Chief Financial Officer sent a letter to all suppliers identified as a medium or high risk asking them to contact Police Scotland if their *'ability to continue to service Police Scotland during this time is going to be affected, interrupted, or indeed completely prevented'*.

The letter did not include a requirement to confirm receipt or provide a nil response. However, the Procurement Team had a process in place which required the procurement lead for each critical supplier to contact their allocated critical suppliers on a weekly basis to confirm that the supplier had no issues servicing Police Scotland, confirm that contact had been made, and escalate any issues identified to management.

We reviewed the records of contact for a sample of 24 suppliers assessed as medium or high risk. In two cases, the suppliers had been recategorized as low risk, and so had been taken out of the scope of critical supplier monitoring arrangements. However, we were unable to obtain evidence of how this decision was made, or the rationale applied.

Risk

There is a risk that decisions to remove suppliers from the critical list may not be subject to appropriate scrutiny, where the rationale for the decision is not documented and reported. This could lead to discontinuities in supply, impacting Police Scotland's ability to deliver key services.

Recommendation

Where suppliers assessed as critical are subsequently downgraded, Procurement should record the rationale and ensure that this decision is appropriately escalated.

Management Action

Grade 2
(Design)

Management accept the recommendation.

Going forward, where the decision is made not to contact critical suppliers, the rationale will be recorded through the existing arrangements for recording supplier updates, in order to maintain a suitable audit trail.

Action owner: Head of Procurement

Due date: Immediate

Control Objective 3: Additional spending relating to COVID-19 response has been accurately captured and appropriate governance arrangements are in place to scrutinise this.



No Reportable Weaknesses Identified

Operation Talla developed Procurement Guidance that required all COVID-19 spend to be recorded against specific job codes. This was needed to comply with Scottish Government Stewardship requirements, which requires all actions and associated costs of COVID-19 to be captured and reported to relevant Scottish Government contacts. In addition to this financial information, the Finance Business Partner responsible for Operation Talla Financial Reporting maintained an Actions and Costs Log which recorded additional contextual information in relation to expenditure decisions. We reviewed this log and confirmed that the information captured was adequate to fulfil reporting requirements set out within the COVID-19 Accountable Officer Guidance issued by the Scottish Government in March 2020. This information has been used to create a report that was issued to Scottish Government weekly from 2 April 2020 until 25 May 2020, at which time reporting became monthly.

In assessing the effects of COVID-19 on the overall budget, Finance undertook three key pieces of work. While most of the work on the 2020/21 budget had been finalised before COVID-19 restrictions came into place, Finance carried out an initial assessment of budgetary effects that identified an anticipated loss of income of £8m in relation to the cancellation of public events. The Chief Financial Officer reported this to the March 2020 SPA Board meeting.

The Finance team created a top down Financial Forecast of the impact of COVID-19. This covered key areas such as police officer and staff costs, PPE, ICT and office supplies, estates, transport and other areas. The Strategic Financial Planning & Budgeting Lead presented this work to the Corporate Finance and People Board (CFPB) on 2 June 2020 which was attended by representatives from Scottish Government. The Strategic Financial Planning & Budgeting Lead subsequently presented to the SPA Resources Committee on 16 June 2020

Finance undertook the Q1 Budget review in July, which included forecasting the full outturn to 31 March 2021. As with the May forecast, the report not only considered costs but also the impact of savings made in this time - such as BP offering free fuel for emergency services and the reduction in non-essential travel. The Strategic Financial Planning & Budgeting Lead presented this to the CFPB on 29 July 2020, and the SPA resources Committee on the 6 August 2020. Ultimately, it was presented to the SPA Board on the 19 August 2020 by the Chief Financial Officer.

To mitigate against the additional spend, the Senior Leadership Board and the CFPB agreed immediate actions for budget stewardship. These included balancing police officer probationer intakes against the number of leavers and reducing non-essential travel wherever possible. These actions have been added to the CFPB action log for monitoring and updates will also be given to the SPA Resources Committee. While original forecasting highlighted a potential £8m overspend versus budget, the immediate actions are forecast to restrict this to a £1m overspend against budget.

Control Objective 4: Changes made to governance and internal control have been captured, reviewed and where appropriate, additional risks escalated

Green

No Reportable Weaknesses Identified

Police Scotland set up Operation Talla to manage the force's response to the pandemic, including an executive command structure led by a Gold Commander with overall strategic responsibility and a Silver Commander in charge of the tactical response.

The Operation was overseen by a Strategic Oversight Board convened for the purpose, chaired by the Chief Constable. This Board delegates to the Gold Commander, and reports to the Police Scotland Strategic Leadership Board and directly to the SPA Board. The Gold Commander or the Chief Constable reported to each meeting of the SPA Board on COVID-19 response from March to June.

The Operation used the Central Logging of Intelligence Operations (CLIO) management system as a single data source for tracking and co-ordinating management decisions and changes to governance and control. CLIO tracked the decisions of each operational cell, creating a repository of information that is clearly time stamped and auditable, and which supported the identification of organisational learnings.

The information captured within the CLIO system was converted into weekly reporting provided to the Gold Commander against each of the operation's strategic priorities as set out in the Gold Strategy. We reviewed the reporting created from the CLIO system and confirmed that this captured changes in governance and control as well as providing updates on the progress of the activity of operational cells.

Silver Command developed, updated, and monitored two Operation Talla risk registers: a Master Risk Register; and a Renewal and Continuous Improvement Risk Register, the latter of which was used by the Operation Talla Renewal and Continuous Improvement Group.

Silver Command provided Gold Command with weekly updates on each of the risk registers. We reviewed both risk registers and found they contained all expected information, including a clear articulation of risks within and outwith tolerance, a description of controls required and implemented to mitigate the risks, risk owners, and an audit trail of updates arising from risk review. Out of tolerance risks requiring escalation, and the organisational risk register to which they have been escalated, are clearly identified.

Each business area has developed escalation and de-escalation plans that set out how revised processes and procedures will revert back to business as usual. They also include criteria for de- or re-activation of the operational cells of Operation Talla. We confirmed that the Gold Commander approved the plans.

Control Objective 5: A lessons learned exercise has been carried out, with actions arising being documented, assigned owners and target dates for implementation set



No Reportable Weaknesses Identified

In April, Operation Talla established the Renewal and Continuous Improvement Group with a focus on three areas: Recovery, Learning and Operational Response.

The Renewal and Continuous Improvement Group then established an Organisational Learning Group with a remit to identify organisational learning opportunities and areas of best practice. This included considering business continuity, partnership working and corporate governance structures. The group's work culminated in a Scoping Report that identifies:

- 28 potential best practices;
- 37 opportunities to improve; and
- 27 recommendations for consideration.

The report drew on the information collated in the CLIO management system, as well as issues and suggestions raised by staff, partners and National Policing networks through liaison with the National Police Chiefs' Council. Once the scoping exercise was complete, the work of the Organisational Learning Group was subsumed within the wider Renewal and Continuous Improvement Framework and is now being taken forward via that structure.

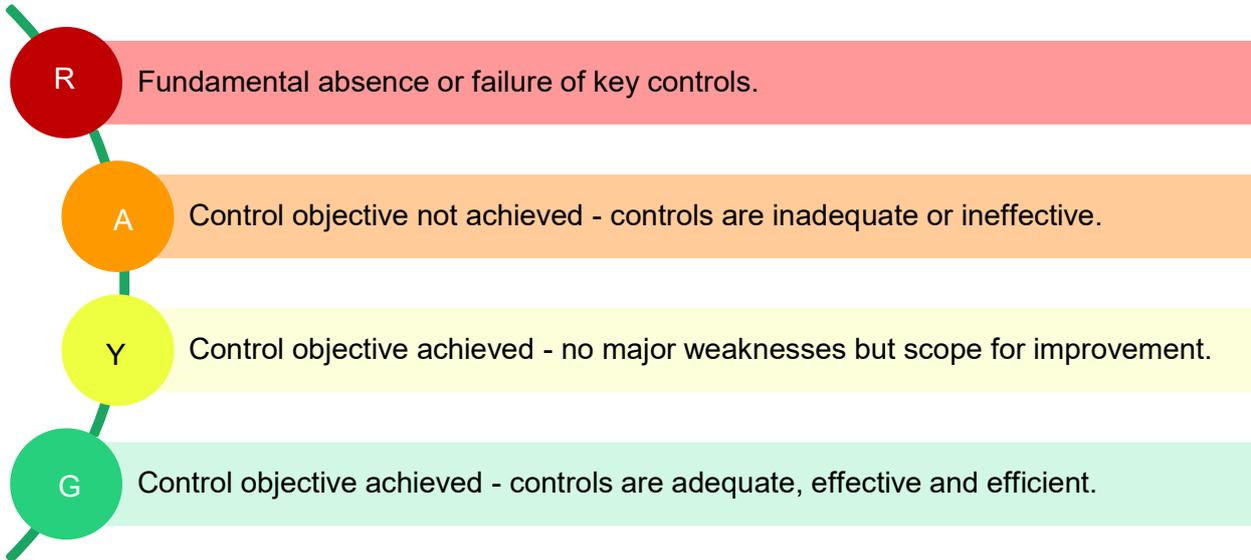
The Renewal and Continuous Improvement Framework is a wider piece of work that has been developed using the outcomes of all three focus areas. The Framework sets out five key themes and ten priorities - these include the establishment of a permanent organisation-wide learning function and a review of mass mobilisation and business continuity to better protect the organisation against future incidents. The identified activities set out against each priority have been assigned executive owners and delivery leads, with fortnightly updates on the progress of the development and implementation of action plans provided to the Strategic Oversight Board.

A key organisational learning arising from the work of the Renewal and Continuous Improvement Group is the requirement to develop a clear pathway for the organisation to return to business as usual, while maintaining the capacity to reactivate Operation Talla functions in the event of further COVID-19 waves or other future pandemic scenarios. This requires identifying areas where revised practice implemented in the course of Operation Talla should become routine practice. A paper titled *Flexible Command and Operational Readiness for Future Covid 19 Pandemic Waves* was approved by the Operation Talla Gold Commander on 14 August 2020. At the time of audit, this paper was due to progress to the Strategic Oversight Board.

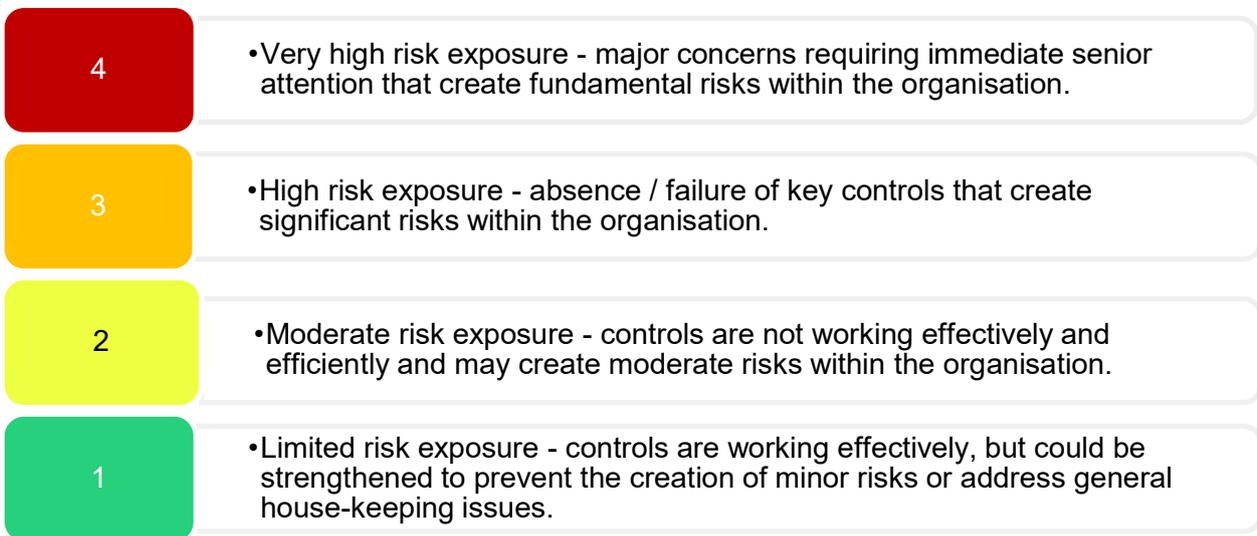
The paper sets out de-escalation and re-escalation criteria, and the associated actions required to reinstate the Operation Talla governance and command structures and operational cells. The key triggers for re-escalation include: absence rates increasing, with a tipping point at 7.5%; and the Scotland R Rate raising above 1.5. We have reviewed the draft plans for escalation and de-escalation, and confirmed that they are consistent with the Scottish Government Route Map.

Appendix A – Definitions

Control assessments



Management action grades



Appendix B – Summary of management actions

Action No.	Recommendation	Management Response	Grade	Action Owner	Due Date
1.1	<p>We recommend that Police Scotland carry out a review of HR policies to identify instances where the approved policies may not be applied as written due to decisions that have been made in response to the COVID-19 pandemic. Police Scotland should then consider whether any of the adjustments may be considered useful for future scenarios and therefore should be incorporated into an updated policy, or will expire within the short term and therefore be removed.</p> <p>Where guidance is considered short-term, this should be recorded and a date of review established for the guidance to ensure that it is removed as soon as appropriate. Where additional guidance is considered useful for the longer-term, HR should ensure that any policy updates should go through the usual approval process including appropriate consultation with employee representatives and trade unions.</p> <p>Finally, it is important that HR clearly communicate both scenarios to both people managers and their direct reports so that everyone understands the HR provisions that are currently in place.</p>	<p>On the point of communicating changes, the Line Management brief does this regularly. We have had feedback from staff on its effectiveness and this will continue to be used to communicate short term changes to policy.</p> <p>We have put in place a robust process to comprehend and understand local lockdown implications. Clear and consistent messaging has been provided that the first point of call for manager advice and guidance is People Direct – this allows us to guide managers in local situations through the right process for their circumstances at that particular time.</p> <p>On the matter of policy reviews, we have a priority list for policy changes based on the criticality of some of the work we are doing round promotions that needs to be prioritised first. We will review the point about undertaking wider reviews as soon as we have other critical time dependent work out of the way.</p>	2	Director of People & Development	April 2021

1.2	Police Scotland should ensure that policies and procedures require that where local areas are required to develop action plans, a process is put in place to ensure that all areas complete such plans on a timely basis. This should include the provision of a nil return where no required actions are identified.	The HR Business Partners, who acted as liaison from P&D with local areas, do have a process in place for collating nil returns. We will highlight the continued requirement for this as part of reporting to ensure that any future similar requests have a means of demonstrating clearly that the activities were complete.	2	Director of People & Development	Complete
2.1	Where suppliers assessed as critical are subsequently downgraded, Procurement should record the rationale and ensure that this decision is appropriately escalated.	Going forward, where the decision is made not to contact critical suppliers, the rationale will be recorded through the existing arrangements for recording supplier updates, in order to maintain a suitable audit trail.	2	Head of Procurement	Immediate

OFFICIAL

© Azets 2020. All rights reserved. Azets refers to Azets Audit Services Limited. Registered in England & Wales
Registered No. 09652677. VAT Registration No. 219 0608 22.

Registered to carry on audit work in the UK and regulated for a range of investment business activities by the Institute
of Chartered Accountants in England and Wales.

OFFICIAL