

**MINUTES OF THE SCOTTISH PRISON SERVICE RISK MONITORING AND  
AUDIT COMMITTEE (RMAC) MEETING HELD IN SPS HQ, G09, ON 28 May 2025**

**Present:** Ian Harley, RMAC Chair and Non-Executive Director  
Teresa Medhurst, Chief Executive, SPS  
Linda Pollock, Deputy Chief Executive, SPS  
Lynne Clow, Non-Executive Director  
Rebecca Murray, Head of Improvement, SPS  
Gerry O'Donnell, Director of Finance, SPS  
Michael Oliphant, Audit Scotland  
Dougie Shepherd, Senior Internal Audit Manager, Scottish Government  
William Wilkie, Internal Audit Manager, Scottish Government  
Monica Habo, Scottish Government  
Lisa Taylor, Head of OCE Branch & Acting Head of Strategy and Planning, SPS  
Stephen Uphill, Non-Executive Director  
Tommy Yule, Audit Scotland  
Nigel Ironside, Head of Digital Services, SPS  
Deborah Whitecombe, Head of Information Management, SPS  
Adam Jobson, Director of Organisation Development, SPS  
Mark Grady, HR Business Partner, SPS

**Introduction and Welcome**

1. The Chair welcomed all present to the meeting.

**Declarations of Interest**

2. There were no new declarations of interest.

**Apologies for Absence**

3. Apologies for absence were received from Michael Beardmore and Alison Malone.

**Draft Minutes of the last RMAC Meeting Held on 27 March 2025**

4. The draft minutes of the meeting held on 27 March 2025 were agreed as a true record.

**Action Log following Last RMAC Meeting**

5. The Chair and members reviewed the Action Log and agreed the current position/update against each action.

**Action: Mrs Blackburn**

**RMAC (MAY)01 / 25: RMAC Chairs Annual Report**

6. This report provided an overview on RMAC for 2024-25,

- RMAC met on 5 occasions during the year. 4 of those meetings were the purpose of usual RMAC business and 1 meeting was dedicated to reviewing the Annual Report and Accounts.
- A comprehensive effectiveness self-assessment was carried out this year and tabled at the September 2024 meeting. Overall, this review noted an improvement in the perceived effectiveness of RMAC compared to the previous full self-assessment (2022/23).

7. Members noted this paper with thanks.

8. Mr Harley highlighted that during discussions at Advisory Board, he raised the progress and improvements that have been made so far. Mr Harley added that it has been suggested RMAC take place in the morning with Advisory Board to follow in the afternoon.

**Action: Rachael Blackburn / Sharon Lawson**

### **External Audit Update – Review of Internal Controls of the previous year (verbal update)**

9. Mr Yule advised members that the annual accounts have been received ahead of schedule. Mr Yule highlighted the following;

- Ex-gratia materiality is slight higher than expected at planning,
- Overspend – this has been discussed with Gerry O'Donnell, linking this time HMP Glasgow and HMP Highland
- MyCSP – following issues last year, amendments were made which has now been removed. CSP have brought forward the timetables which could potentially be an issue. Members were made aware that the formal deadline is August 2025, however information should be provided for 27th June which they will keep an eye on.

10. They expect the accounts to be provided on time for July meeting however will follow up in June to confirm they are still on target

11. Members noted this paper with thanks.

### **RMAC(MAY)02/25: Risk Management Progress Report**

12. Members were provided an overview of the current position of the SPS Corporate Risk Register (CRR), and details of work undertaken since the last RMAC meeting of March, to support the operation of effective Risk Management processes across SPS.

The following risks have been rescored since the last RMAC:

- **Cyber Security** – This move reflects the 'limited' assurance assessment made in a recent Internal Audit report and identification of areas for improvement.
- **Information Governance** – Weaknesses in a number of core processes have been identified. Plans are in place, with a new Head of Information Management in post.

- **Operational Workforce Capacity** –Overall, we are currently running at complement, although sickness and other absence continues to have an impact.

13. A new risk is currently under development, to be proposed to EMG and is a revision of the current climate risk in light of the more aware position of SPS. It is anticipated that the current climate risk SPS would move to be 'Tolerated' and its contents absorbed into a new risk that focusses more explicitly on the threats of infrastructure damage and operational disruption due to climate-related events.

14. Members noted this paper with thanks.

15. An update on internal audit actions was requested for next RMAC

**Action: Michael Beardmore**

16. Members discussed the current population pressures, which is increasing in complexity. It was noted that while numbers have stabilised this has not provided the needed respite to allow for internal operational changes to be made. Mrs Medhurst stated that there needs to be a reduction in numbers to around 7800 for this to be feasible.

17. Members were made aware that following recommendations from the Chief Inspectorate, Scottish Government would be leading on the Escort Contract going forward. Mrs Medhurst noted that there has been a lot of work carried out to get to this stage, noting a recalibration of the contract itself.

### **RMAC(MAY)03/25: "In-Depth" Review of One Corporate Risk - HR Transformative project / Payroll**

18. This presentation provided an update on the HR Transformative Project. In March 2022, MPMG approved the Strategic Business Case that set out Corporate Services commitment to operate HR in a 'fit for purpose' way.

19. Corporate Services undertook a scoping exercise to inform the end-to-end design and implementation of a future state, digitally enabled, high impact HR function that empowers leaders and employees and is aligned to strategic outcomes.

20. Extensive engagement highlighted common themes and issues, including:
- Lack of HR strategy, governance, and clear lines of responsibility
  - Disconnected data sources that make it difficult to compile accurate and meaningful insights to inform decision making
  - Lack of support, coaching and collaboration for managers on people practices
  - Employees lack access to their data, impacting their ability to make choices and access services

21. Original go-live was scheduled for August 2024. A decision was made by the Programme Board to extend go-live by two months to October 2024. In September 2024 a further decision was made to further extend the go-live in response to errors

in the second parallel pay run that required further systems development. Go-Live was achieved in February 2025.

22. Members noted this paper with thanks.

23. Members were made aware that one of the key risks was the ability ensure staff were paid on time and accurately at 'go live'. It was noted that 99% were paid on time and accurately, while 44 employees were not, however advances to salaries were paid to rectify this.

**RMAC(MAY)04/25: Internal Audit Annual Assurance Opinion to Accountable Officer**

24. The report provided an update on Directorate for Internal Audit and Assurance (DIAA) work during the year and provides an overall assurance opinion on risk management, control and governance arrangements in place within SPS. It's primary aim is to provide the Accountable Officer and the RMAC with the internal audit team's professional opinion.

25. Over the course of the 2024-25 year, SPS has faced a number of challenges in delivering its remit. This includes around prison population levels, establishment capacity, early release schemes, issues with the Ex-Gratia process and a recent Fatal Accident Inquiry determination. It is to the credit of SPS that it has positively responded to these challenges, including utilising internal audit where appropriate, during the year and into 25-26 to provide advice and support in dealing with these issues.

26. During 2023-24 IA carried out five reviews, two of which attained reasonable assurance ratings with two limited and the other substantial. The team had generally strong engagement from SPS staff. IA carried out six follow up reviews, however only 26% of recommendations had been fully implemented, with the rest either partially implemented or outstanding and two superseded. This has been highlighted with the RMAC during the year. IA acknowledge that RMAC is maintaining a watching brief on this.

27. Members noted this paper with thanks.

**RMAC(MAY)05a&b/25: Internal Audit Progress Update**

28. This report provided an update on key progress highlights, internal audit strategic matters, integrated assurances and Internal Audit Plan and Progress 2024.

29. Since the last Risk Monitoring & Audit Committee (RMAC), the final reports on the Health and Safety and Counter-Fraud and Awareness and reviews have been issued. This concludes all main assurance reviews in the 2024-25 plan. Fieldwork work is continuing on the Governance advisory with the report anticipated end May 2025. The final report on the Ex-Gratia advisory has been issued. The Public Sector Reform/Transformation Advisory is continuing into the 2025-25 year. Both the Organisational L&D and Stakeholder and Communications follow-ups have been issued. All follow-ups scheduled for 2024-25 have now been completed.

30. Members noted this paper with thanks.

31. It was noted that in areas where there has been limited traction, it may be beneficial to speak with Mrs Pollock or Mrs Medhurst to look at ways to encourage engagement.

32. It was noted that due to competing projects, such as ERS/SCP40, progress has been slowed in closing action points. However, the professionalism and persistence of the audit team has been greatly beneficial and while it is disappointing to see the completed percentages, good progress has been made. Mrs Medhurst advised that they intend to apply more vigour in the coming year and continue to make progress.

**33. RMAC(MAY)0625: Draft Governance Statement**

34. This paper provided an overview of SPS' overarching governance and accountability framework, in addition to their scope of responsibilities, risk management, review of effectiveness and significant governance and risk issues.

35. Members noted this paper with thanks.

**RMAC(MAY)07/25: Annual Report on Information Security**

36. The Information Management team has a compliment of seven full time staff plus two temporary staff assigned from SMG. The recruitment of a Head of Information Management took place in early 2025 and Deborah Whitcombe was successful at interview. A business case has been approved for a Data Protection Manager plus two Information Management Officers to support the team and has been included in the Digital Services complement.

37. Progress is being made in upgrading and properly supporting core IT systems which is addressing risks in the Digital Services Risk register, which informs the corporate risk register. However, these rely on consistent and sustained capital and resource funding. RMAC should note SPS achieved Cyber Essential accreditation in May 2025.

38. Between April 2024 and March 2025, a total of 2050 Subject Requests were processed at a rate of 170 per month, an increase of 37% on last year.

39. SPS currently does not have a corporate Information Asset Register (IAR). The Head of Information Management has been working to align SPS with Scottish Governments Information Asset structure. This will allow SPS to take advantage of comprehensive training and guidance as well as established asset management and risk assessment processes.

40. The Information Management Team continues to deliver Protecting Information training to all new operational recruits at the SPSC. The EMG also recently agreed to mandatory training for cyber security awareness as part of the cyber security audit.

41. The Case Management Platform (PR2) requires to be remodelled to support improvement of the SPS's use of data. The Strategy and Improvement Team have commenced the development of a Data Strategy which is currently assessing the costs and benefits of Data Warehousing as a storage option.

42. The SPS Information Management Strategy, approved by EMG in January 2021, builds on the Scottish Government Digital Transformation Service (DTS) recommendations that SPS should establish properly resourced Information Management and Business Intelligence functions as well as building modern digital information systems.

43. Members noted this paper with thanks.

44. Members had a lengthy discussion on perceived under reporting of information security incidents, it was noted that this is likely due to a misunderstanding of what is expected to be reported.

45. It was clarified that FOIs are not managed by the same team, however, there is engagement with the FOI Manager and compliance has overall improved.

46. Ms Whitecombe advised that she was not involved in setting the objectives for 2024-25, and that some of the actions set have not been achievable. Ms Whitecombe added that she feels this has been due to a lack of understanding of the complexities and underestimating the reality of realising these actions.

47. It was noted that Information Security colleagues would likely be invited back to a future RMAC to provide an update of their review.

### **RMAC(MAY)07/25: Operational Audit Update**

48. This report provided an update on the Operational Audits conducted during the first quarter of 2025/26 financial year.

49. Of the 9 audits scheduled in quarter 1 of 2025/26 financial year, 4 have been completed. There are 2 outstanding audits of Searching and 3 outstanding audits of the Prevention of Suicide in Prisons Strategy (PSIPS). The Searching audits and one of the PSIPS audits should be completed in June, the 2 remaining PSIPS audits have been rescheduled for quarter 2. This was to allow time for a new risk assessment process for Young Offenders at Polmont to become embedded and to avoid a clash with an HMIPS Inspection at Kilmarnock.

50. One Operational auditor continues to work with the short life working group implementing the new Ex -gratia products.

51. Members noted this paper with thanks.

### **Any Other Business**

52. Recruitment - Mr Uphill noted that Advisory Board had discussed the pressures facing new recruits and the challenges that they may come across for the first time,

e.g. substance misuse. He queried whether it would be possible to consider the length of service for those resigning from SPS. Members agreed that this may provide a fuller picture to the challenges they are facing in terms of recruitment and staff retention.

**Date of Next Meeting**

53. The next RMAC meeting will be held on 30 July 2025 from **13:00** in **SPS HQ, G09**

**RMAC Secretariat**  
**28 May 2025**