



HM INSPECTORATE OF CONSTABULARY IN SCOTLAND

Strategic Review of Undercover Policing in Scotland - Terms of Reference

January 2017



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HM Inspectorate of Constabulary in Scotland

HM Inspectorate for Constabulary in Scotland (HMICS) is established under the Police and Fire Reform (Scotland) Act 2012 and has wide ranging powers to look into the 'state, effectiveness and efficiency' of both the Police Service of Scotland (Police Scotland) and the Scottish Police Authority (SPA).¹

We have a statutory duty to inquire into the arrangements made by the Chief Constable and the SPA to meet their obligations in terms of best value and continuous improvement. If necessary, we can be directed by Scottish Ministers to look into anything relating to the SPA or Police Scotland as they consider appropriate. We also have an established role in providing professional advice and guidance on policing in Scotland.

- Our powers allow us to do anything we consider necessary or expedient for the purposes of, or in connection with, the carrying out of our functions.
- The SPA and the Chief Constable must provide us with such assistance and co-operation as we may require to enable us to carry out our functions.
- When we publish a report, the SPA and the Chief Constable must also consider what we have found and take such measures, if any, as they think fit.
- Where our report identifies that the SPA or Police Scotland is not efficient or effective (or best value not secured), or will, unless remedial measures are taken, cease to be efficient or effective, Scottish Ministers may direct the SPA to take such measures as may be required. The SPA must comply with any direction given.
- Where we make recommendations, we will follow them up and report publicly on progress.
- We will identify good practice that can be applied across Scotland.
- We work with other inspectorates and agencies across the public sector and co-ordinate our activities to reduce the burden of inspection and avoid unnecessary duplication.
- We aim to add value and strengthen public confidence in Scottish policing and will do this through independent scrutiny and objective, evidence-led reporting about what we find.

Our approach is to support Police Scotland and the SPA to deliver services that are high quality, continually improving, effective and responsive to local needs.²

This strategic review will be undertaken by HMICS in terms of Section 74(1) of the Police and Fire Reform (Scotland) Act 2012 and will be provided to Scottish Ministers and published in terms of Sections 78 (1) and (2) of the Act.

¹ Chapter 11, Police and Fire Reform (Scotland) Act 2012.

² HMICS, [Corporate Strategy 2014-17](#) (2014).

Our review

Introduction

1. This strategic review of undercover policing in Scotland has been directed by the Cabinet Secretary for Justice and will be undertaken by HMICS in terms of Section 74(1) of the Police and Fire Reform (Scotland) Act 2012. Our report will be provided to Scottish Ministers and published in terms of Sections 78 (1) and (2) of the Act.

Aim of our review

2. The Cabinet Secretary for Justice wrote to HMICS on 22 September 2016 and set out the following expectations of the review:
 - provide an independent view of the operation, procedures and safeguards in place by Police Scotland in relation to undercover policing, with the objective of providing assurance to Scottish Ministers, the Scottish Parliament and the public. Where relevant, this should include recommendations to address any gaps in the current operation, processes and safeguards or where opportunities to drive improvement are identified.
 - examine the extent and scale of undercover policing in Scotland by Scottish policing since introduction of the Regulation of Investigatory Powers (Scotland) Act 2000 and the Regulation of Investigatory Powers Act 2000.
 - examine the extent and scale of undercover policing operations carried out in Scotland by the National Public Order Intelligence Unit (NPOIU)³ and the Special Demonstration Squad (SDS)⁴ in the same period.
 - comment on the contribution made by undercover policing operations towards public safety in Scotland.
3. To meet these expectations, HMICS will examine the effectiveness and efficiency of the arrangements currently in place by Police Scotland to authorise, deploy, supervise, manage and scrutinise undercover policing operations in Scotland. We will assess compliance with the relevant law and codes of practice and include a review of all undercover policing activity by Police Scotland since its establishment on 1 April 2013.
4. We will also provide an independent analysis of the extent and scale of (i) undercover policing operations carried out in Scotland by Scottish policing including legacy police forces and the Scottish Crime and Drug Enforcement Agency (SCDEA); and (ii) those undercover policing operations carried out in Scotland by the NPOIU and the SDS. This analysis will cover the period since introduction of both the Regulation of Investigatory Powers (Scotland) Act 2000 (referred to as 'RIPSA 2000') and the Regulation of Investigatory Powers Act 2000 (referred to as 'RIPA 2000').⁵ In practical terms, our analysis will cover the period from 1 October 2000 until 31 December 2016. This represents the commencement of RIPSA 2000 and was the earliest consideration of covert policing by the Scottish Parliament under its

³ The National Public Order Intelligence Unit (NPOIU) was established in 1999 to gather and co-ordinate intelligence relative to domestic extremism and public order. The NPOIU was governed by the then Association of Chief Police Officers (ACPO) in England and Wales, Home Office and other stakeholders. In January 2011, the NPOIU was subsumed with other units under the National Domestic Extremism Unit (NDEU) within the Metropolitan Police Service.

⁴ The Special Demonstration Squad (SDS) was an undercover unit within the Metropolitan Police Service operational from 1968 to 2008. The SDS specialised in the long-term undercover deployment of officers into a range of groups that had the potential to cause serious public disorder or other violence or injury.

⁵ The RIPSA Bill of the Scottish Parliament was passed by the Parliament on 7 September 2000, received Royal Assent on 28 September 2000 and came into effect on 1 October 2000. RIPA 2000 was passed by the Parliament of the United Kingdom on 28 July 2000 and Part II of the Act (surveillance and covert human intelligence sources) came into effect on 25 September 2000.

devolved responsibility for policing in Scotland.

Scope of our review

5. It should be noted that this strategic review of undercover policing in Scotland is not a public inquiry under the Inquiries Act 2005, although it may inform future discussions as to the requirements for an inquiry into undercover policing in Scotland.
6. The statutory powers of HMICS do not extend to the investigation of individual cases or complaints made against police officers or members of police staff involved in undercover policing operations in Scotland. Should anyone approach HMICS during our review with such a complaint, we will offer advice on where the complaint should be directed.⁶ However, HMICS will be interested in any strategic issues or themes arising from these complaints and may use them to inform our scrutiny of undercover policing. This will be subject to HMICS receiving consent from anyone who may approach us with such a complaint.
7. HMICS has contacted the secretariat for the Undercover Policing Inquiry (UCPI) being conducted in England and Wales under the chairmanship of Sir Christopher Pitchford.⁷ This contact has been to manage potential areas of crossover with our review. Although the purpose of the UCPI is to investigate and report on undercover police operations conducted by English and Welsh police forces in England and Wales since 1968, the activities of some undercover police officers who will be examined by the Inquiry will inevitably have taken them outside of the jurisdiction of England and Wales and into Scotland. While individuals may wish in due course to offer evidence about this to the UCPI this is entirely a matter within the terms of reference of that Inquiry.
8. It is outside of the terms of reference of the UCPI to call for evidence or to conduct investigations in relation to either undercover police operations conducted outside England and Wales, or in relation to undercover police operations undertaken in England and Wales other than by English and Welsh police forces. Where there is information which appears to be relevant to matters under consideration by HMICS as part of the strategic review of undercover policing in Scotland, the UCPI will inform the owner of that information about the strategic review and pass on contact details. In the event that during the course of the review, HMICS identifies information which may fall within the scope of the terms of reference concerning the conduct of undercover police operations in England and Wales, by English and Welsh police forces, then HMICS will inform the owner of the information of the purpose of the UCPI and direct the owner accordingly.
9. The Office of Surveillance Commissioners (OSC) is the independent body responsible for overseeing the use of covert surveillance in the United Kingdom (UK) by designated public authorities, including Police Scotland. Our review will not cover any matters that are properly within the statutory remit for the OSC and, where necessary, we will liaise with the OSC to manage any potential areas of crossover.
10. Our website – www.hmics.org – allows individuals to contact us directly. Where we receive relevant information regarding undercover policing practices in Scotland, this information will be handled in a sensitive and confidential manner and used solely for the purposes of informing our scrutiny activity.

⁶ Individuals have the right to make a complaint to Police Scotland where a police officer or police staff has failed to meet the standards expected or if it is believed they have behaved unfairly or incorrectly. The Police Investigations and Review Commissioner undertakes independent investigations into the most serious incidents involving the police. It also undertakes complaint handling reviews of the way police have handled complaints from the public. The Investigatory Powers Tribunal is a court which investigates and determines complaints which allege that public authorities or law enforcement agencies have unlawfully used covert techniques which may have breached a wider range of human rights. Where a person convicted of a crime in a Scottish Court believes that a miscarriage of justice may have occurred in respect of either the conviction, sentence imposed or both, then the Scottish Criminal Cases Review Commission may be able to review the case.

⁷ [Undercover Policing Inquiry in England and Wales.](#)



11. Our report will provide assurance on whether undercover police operations are operating effectively and efficiently within Police Scotland, as well as assessing the capacity for continuous improvement.
12. HMICS will be mindful at all times of the wider interest of public safety and will not reveal information capable of impacting negatively on this interest, including covert tactics, operational methods, and material potentially leading to the identification of covert human intelligence sources, including undercover officers.

Statutory framework

13. The statutory framework for the use and conduct of undercover police operations in Scotland is provided by RIPSAs 2000. This is supplemented by the Code of Practice on Covert Human Intelligence Sources (CHIS).⁸
14. An undercover police officer is defined under Section 1(7) of RIPSAs 2000 and the Regulation of Investigatory Powers (Authorisation of Covert Human Intelligence Sources) (Scotland) Order 2014⁹ as a ‘relevant source’ who holds an office, rank or position within policing and as a ‘relevant source’ establishes or maintains a personal or other relationship with a person for the covert purpose of facilitating the doing of anything falling within paragraphs (b) or (c)
 - (b) covertly uses such a relationship to obtain information or to provide access to any information to another person; or
 - (c) covertly discloses information obtained by the use of such a relationship or as a consequence of the existence of such a relationship.
15. A ‘relevant source’ may also be described as a police officer who is deployed covertly (undercover) in circumstances designed to conceal their true identity and role as a police officer for the purpose of preventing or detecting crime or preventing public disorder. Undercover police officers are volunteers and may be deployed across three categories of undercover activity:
 - Undercover Foundation (UCF)
 - Undercover Online (UCOL)
 - Undercover Advanced (UCA)
16. By way of example, undercover foundation officers may be deployed to test purchase the availability of controlled drugs from local street drug suppliers. Undercover online officers may be deployed through social media and other applications to protect vulnerable persons and to investigate and detect online internet offenders across a wide range of criminality including online child sexual exploitation. More complex and protracted undercover deployments are conducted by undercover advanced officers, including the investigation of major and serious organised crime and counter terrorism. In such operations, it is not uncommon for undercover advanced officers from across the UK to be deployed in support of Scottish police operations and vice versa.
17. Where the conduct authorised is likely to take place in Scotland, authorisations should ordinarily be granted under RIPSAs 2000. However, where the conduct authorised is likely to take place in Scotland by those public authorities listed in Section 46(3) of RIPA 2000¹⁰ and the Regulation of Investigatory Powers (Authorisations Extending to Scotland) Order 2009¹¹ then authorisations should be granted under RIPA 2000. Furthermore, where the authorisation is for use or conduct that will mainly take place outwith Scotland; will start outwith Scotland; or is for reserved purposes such as national security or the economic well-being of the UK, then RIPA 2000 is the appropriate legislation.
18. In 2014, the Scottish Government introduced the Regulation of Investigatory Powers (Covert Human Intelligence Sources: Relevant Sources) Order 2013 and the Regulation of Investigatory Powers (Authorisation of Covert Human Intelligence Sources) (Scotland) Order

⁸ Scottish Government, [Covert Human Intelligence Sources Code of Practice](#) (2014).

⁹ [The Regulation of Investigatory Powers \(Authorisation of Covert Human Intelligence Sources\) \(Scotland\) Order 2014](#).

¹⁰ Legislation, Section 46: [Restrictions on authorisations extending to Scotland](#).

¹¹ [The Regulation of Investigatory Powers \(Authorisations Extending to Scotland\) \(Amendment\) Order 2009](#).



2014.¹² This increased the statutory supervisory level for ordinary authorisations of ‘relevant sources’ to the rank of assistant chief constable and for long-term authorisations to deputy chief constable or chief constable. In any case where an authorisation is likely to be required for more than 12 months, a deputy chief constable or chief constable must obtain prior approval from the Office of Surveillance Commissioners (OSC) before authorising the deployment.

¹² [The Regulation of Investigatory Powers \(Authorisation of Covert Human Intelligence Sources\) \(Scotland\) Order 2014.](#)

Background

19. To maintain public confidence in policing, the tactics employed in undercover police operations must be lawful, proportionate and necessary. They must also be subject to appropriate governance and oversight. Officers engaged in this specialist area of policing must comply with the law as well as the associated codes of practice. The use of this specialist policing tactic has generated widespread public concern that the activities, supervision and governance of undercover police officers (predominately in England) have been ineffective. In response to public concerns, several reviews examining undercover policing in England and Wales have been undertaken including:
 - *A review by HMIC in England and Wales of national police units, which provide intelligence on criminality associated with protest. (HMIC (2012))*¹³
 - *A review by HMIC in England and Wales of progress made against the recommendations from its 2012 report on the national police units which provide intelligence on criminality associated with protest. (HMIC (2013))*¹⁴
 - *Reports published by Operation Herne,¹⁵ which was formed in 2011 in response to allegations made by the Guardian newspaper about alleged misconduct and criminality engaged in by members of the SDS.*
 - *The Ellison review (2014)¹⁶ into possible corruption and the role of undercover policing in the Stephen Lawrence case.*
 - *An inspection of undercover policing by HMIC in England and Wales which made a total of 49 recommendations across policies, systems, training and leadership. (HMIC (2014))*¹⁷
20. In December 2014, HMICS met with chief officers at Police Scotland to discuss the relevance and identify any recommendations from the HMIC (2014) report that may have impacted on Police Scotland's capacity and capability to deliver undercover policing. This review will examine and report on Police Scotland's response to the HMIC (2014) report.
21. On 12 March 2015, the Home Secretary established the Undercover Policing Inquiry (UCPI)¹⁸ in response to concerns raised about the conduct of undercover police officers operating within the NPOIU and the SDS of the Metropolitan Police Service. The purpose of this Inquiry is to investigate and report on undercover police operations conducted by English and Welsh police forces in England and Wales since 1968. The terms of reference for the Inquiry were published on 26 May 2015.¹⁹
22. Concerns around undercover policing in Scotland have been raised in the media and within the Scottish Parliament where members have debated the need to extend the terms of reference of the UCPI to include Scotland or establish a separate public inquiry into undercover policing in Scotland.²⁰ The Scottish Government had requested the Home

¹³ HMIC, *A review of national police units which provide intelligence on criminality associated with protest* (2012).

¹⁴ HMIC, *A review of progress made against the recommendations in HMIC report (2012) on the national police units which provide intelligence on criminality associated with protest* (2013).

¹⁵ Derbyshire Constabulary, [Operation Herne](#).

¹⁶ Mark Ellison QC, [The Stephen Lawrence independent review: possible corruption and the role of undercover policing in the Stephen Lawrence case](#) (2014).

¹⁷ HMIC, [An inspection of undercover policing in England and Wales](#) (2014).

¹⁸ [Undercover Policing Inquiry in England and Wales](#).

¹⁹ [UCPI - Terms of Reference](#)

²⁰ Scottish Parliament Members' Business motions in the name of Neil Findlay MSP on the 'Pitchford Inquiry and undercover policing in Scotland' dated [06 January 2016](#) and [30 June 2016](#).



Secretary to extend the terms of reference for the UCPI to consider activity conducted by Metropolitan Police undercover officers deployed in Scotland, however, this request was subsequently declined by the Home Secretary.

23. On 22 September 2016, the Cabinet Secretary for Justice directed HMICS to undertake this strategic review. This will be the first time that HMICS has scrutinised undercover policing in Scotland.



Methodology

24. We will use the HMICS Inspection Framework²¹ in conducting our review. This provides a structure that is risk-based, proportionate and focused on improving policing in Scotland. Our findings and any recommendations for improvement will be founded on evidence and organised around six themes:

- Outcomes
- Leadership and governance
- Planning and process
- People
- Resources
- Partnerships



25. The specific elements we will examine against each of these themes is highlighted in the Inspection Framework for our Review at **Appendix 1**. We will deliver our review over four stages with distinct workstreams, some of which will be undertaken concurrently.

Stage One – Design, planning and initial scoping

(September 2016 to January 2017)

26. This stage included the development of our inspection framework and the design of review tools and scrutiny processes. This provides a focus for the collection and assessment of evidence by the review team and informed this Terms of Reference.
27. Initial scoping allows the review team to assess resources, minimise the overall burden of the review and provide sufficient information to make evidence-based judgements. This initial stage includes desktop research, relevant academic research and an analysis of previous reports to identify known concerns and shortcomings previously identified in undercover policing. We will also scan the media and internet to determine how undercover policing in Scotland is viewed by the public and partners.
28. Police Scotland will be asked to provide a single point of contact for the review to support the process and to facilitate appropriate access to people and information.
29. In accordance with our duty of user focus,²² we will actively engage with a range of stakeholders and gather their views throughout the review process. Key stakeholders include:

- Police Scotland
- Scottish Police Authority
- Scottish Government
- Staff associations and unions
- Elected representatives
- Crown Office and Procurator Fiscal Service (COPFS)

²¹ HMICS, [Inspection Framework](#) .

²² Section 112, Public Services Reform (Scotland) Act 2010.

- Police Investigations and Review Commissioner (PIRC)
- Her Majesty's Inspectorate of Constabulary (HMIC) in England and Wales
- College of Policing in relation to Authorised Professional Practice
- National Police Chiefs' Council – National Undercover Working Group (NUWG) Secretariat
- National Police Chiefs' Council – National Co-ordination Team – Undercover Policing Inquiry (UCPI)
- Office of Surveillance Commissioners (OSC)
- Secretariat to the Undercover Policing Inquiry
- National Crime Agency (NCA)
- Scottish Human Rights Commission (SHRC)

Stage Two – Workstream 1 Fieldwork – Current operational delivery

(estimated January to March 2017)

30. This stage will focus on testing the operational delivery of undercover policing in Scotland since the establishment of Police Scotland on 1 April 2013. Specific topics and questions for interviews and focus groups will be structured around our Inspection Framework. This stage will involve the following activities:
- review the current leadership, governance, supervision, management and oversight arrangements including risk management, welfare and performance reporting
 - review and assess the end-to-end undercover policing operation, procedures, processes and safeguards
 - review and assess current resource levels, structures, experience and training
 - observation of internal governance arrangements including tasking and co-ordination group meetings
 - interviews and focus groups with officers and staff including undercover police officers
 - interviews with relevant senior police officers
 - engagement with partners and stakeholders to establish the effectiveness of collaborative and co-ordinated working
 - benchmark activity to contrast and compare Police Scotland's approach to undercover policing with national guidance and recognised best practice provided by the NUWG
 - examine relevant strategies, policies, guidance, policing plans and analytical products that are designed specifically in relation to undercover policing including performance and management information
 - examine all OSC reports for the period 2000-2016, including legacy police arrangements pre-police reform with specific focus on undercover policing and organisational learning and development
 - development of a legislative and policy timeline 2000-2016
 - literature review, analysis of previous reviews and key findings and consultation with academics.
31. Should HMICS identify any areas for immediate improvement during our review, these will be communicated directly to Police Scotland for consideration. The details of any immediate improvement requests will be included in our final report.



Stage Two – Workstream 2 Fieldwork – Scottish Operations in Scotland

(estimated January to May 2017)

32. This stage will examine the extent and scale of undercover policing in Scotland by Scottish policing since the introduction of RIPSAs 2000 and RIPAs 2000, from 1 October 2000 until 31 December 2016. This activity will involve a qualitative and quantitative analysis of undercover police authorisations to ensure that the process reflected national standards including compliance with statutory duties and codes of practice.

Stage Two – Workstream 3 Fieldwork – SDS / NPOIU Operations in Scotland

(estimated January to May 2017)

33. This stage will examine the extent and scale of undercover policing operations carried out in Scotland by the NPOIU and the SDS. This will cover the period since the introduction of RIPSAs 2000 and RIPAs 2000, from 1 October 2000 until 31 December 2016. This fieldwork has a critical dependency with (i) the work of the Metropolitan Police Service in respect of the SDS; and (ii) the National Police Chiefs' Council (NPCC) National Co-ordination Team in respect of the NPOIU in relation to the UCPI. The statutory powers of HMICS do not extend to the scrutiny of police forces across England and Wales, although we will work closely with the Metropolitan Police Service and the NPCC to access information needed for this stage of our review. Our proposed timescales for reporting will be entirely dependent on their work to support the UCPI.

Stage Three – Review and analysis of evidence


(estimated June to July 2017)

34. During this stage, HMICS will review and assess the information and evidence collected during our fieldwork stages. This will include an assessment of the contribution made by undercover policing in Scotland towards public safety. Where appropriate, we will identify areas for further examination and analysis, which may require additional fieldwork activity and a change to our reporting timescales.

Stage Four – Reporting, quality assurance and publication

(estimated July to August 2017)

35. Following conclusion of our fieldwork and analysis, we will prepare a report in line with HMICS reporting guidelines. The report will outline our methodology and approach, our findings and any recommendations for improvement. Where we identify good practice, this will also be highlighted in our report.
36. Quality assurance will be provided through internal review and factual accuracy checking by relevant stakeholders who have contributed to the evidence base of our report. This process is likely to be more protracted than our usual checking processes due to the number of relevant stakeholders involved in this review.
37. Our report will first be submitted to Scottish Ministers who will lay it before the Scottish Parliament and publish it in terms of Sections 78(1) and (2) of the Police and Fire Reform (Scotland) Act 2012. Copies of the report will also be provided to the SPA and the Chief Constable who must have regard to any recommendations and take such measures, if any, as they think fit in relation to the report.
38. In keeping with our normal inspection and review procedure, we will request that an improvement plan detailing key actions and timelines be submitted to address any recommendations. We will also publish a copy of the report on our website.
39. This strategic review will be led by Derek Penman, HM Chief Inspector of Constabulary in Scotland. He will draw on the experience and expertise of a number of people during this



review, including staff from within HMICS and others from outwith who will be independent of policing in Scotland. He will put measures in place to protect the overall integrity of the review and will ensure that all members of the team are deployed appropriately into specific areas where there can be no conflict of interest.

40. Subject to the complexities and external dependencies involved in this review, we will endeavour to provide our final report to Scottish Ministers in sufficient time for it to be laid before the Scottish Parliament on return from the summer recess on 4 September 2017.

Derek Penman QPM

HM Chief Inspector of Constabulary in Scotland

January 2017

Appendix 1 – HMICS Inspection Framework for our review

HMICS Inspection Framework – Undercover Policing in Scotland					
Outcomes	Leadership and governance	Planning and process	People	Resources	Partnerships
1.1 Adherence to and compliance with statutory duties ²³ and codes of practice	2.1 Strategic leadership and direction	3.1 Authorisation and conduct	4.1 Selection, staff skills, recruitment, training, development and knowledge	5.1 Capacity and capability and management of resources	6.1 Partnership and stakeholder engagement
1.2 Adherence to national guidance	2.2 Scrutiny and oversight arrangements	3.2 Risk management planning and deployment	4.2 Welfare, support, trust and confidence of staff	5.2 Organisational structures and processes to support delivery of outcomes	6.2 Collaborative and co-ordinated working
1.3 Contribution made by undercover policing towards public safety	2.3 Supervision and management	3.3 Record keeping, decision log and policy files	4.3 Staff, motivation, satisfaction and contribution	5.3 Information systems and data management	
		3.4 Operational security		5.4 Costs and internal financial management	
		3.5 Performance management and quality assurance			
		3.6 Organisational learning and development			

²³ This includes compliance with the Criminal Justice and Licensing (Scotland) Act 2010 in terms of the disclosure of evidence in criminal proceedings. HMICS shall engage with COPFS throughout the review process to ensure that any matters that may arise during the course of the review in terms of disclosure are highlighted to COPFS.



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About Her Majesty's Inspectorate of Constabulary in Scotland

HMICS operates independently of Police Scotland, the Scottish Police Authority and the Scottish Government. Under the Police and Fire Reform (Scotland) Act 2012, our role is to review the state, effectiveness and efficiency of Police Scotland and the Scottish Police Authority. We support improvement in policing by carrying out inspections, making recommendations and highlighting effective practice.

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