

FOI Disclosures August 2023

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This month we have responded to questions relating to the following topics:

- [HR, Payroll, ERP and EPM systems](#)
- [Vacancy for role of investigator](#)
- [IOPC Equality strategy and training](#)
- [Referral relating to Chief Constable Will Kerr](#)

If you require a full copy of any of the embedded attachments, please contact Requestinfo@policeconduct.gov.uk quoting the reference number from the relevant response.

Ref 5024313 Back to top	<u>HR, Payroll, ERP and EPM systems</u>
<u>Request</u>	<i>You asked a number of questions regarding our HR, payroll, ERP and EPM systems</i>
<u>Response</u>	<p>You asked: <i>“How many employees do you have?”</i></p> <p>We average around 1060 employees.</p> <p>HR & Payroll</p> <p>You asked: <i>“Which Human Capital Management (HCM) or HR and Payroll system/s do you currently use?”</i></p> <p>We use Zellis ResourceLink for HR and a Civica Solution for payroll</p> <p>You asked: <i>“What is the value & expiry date of your current contract/license? What are the extension options?”</i></p> <p>The current HR contract expires in March 2026 with a one year extension option. The current payroll contract expires in March 2024 with no extensions.</p> <p>You asked: <i>“Do you have any plans to review (upgrade/change) this system?”</i></p> <p>We are moving to ResourceLink HCM as part of the existing contract which will include a payroll module.</p> <p>ERP</p>

	<p>You asked: <i>“Which Enterprise Resource Planning (ERP) or Finance system do you currently use?”</i></p> <p>Unit 4</p> <p>You asked: <i>“What is the value & expiry date of your current contract/license? What are the extension options?”</i></p> <p>The G Cloud 12 contract expires at the end of June 2024 with an option to extend a further two years (1+1).</p> <p>You asked: <i>“Do you have any plans to review (upgrade/change) this system?”</i></p> <p>There are no current plans to change this system.</p> <p>EPM</p> <p>You asked: <i>“Which Enterprise Performance Management (EPM), Scenario Planning or Strategic Modelling system do you currently use? What is the value & expiry date of your current contract/license? What are the extension options? Do you have any plans to review (upgrade/change) this system?”</i></p> <p>We do not have an EPM system.</p> <p>We have decided that we are unable to release information regarding the contract values to you to you by virtue of an exemption provided at section 43(2) of the FOIA.</p> <p>This exemption applies where disclosure would be likely to prejudice the commercial interests of any ‘person’ or legal entity, which could include a public authority such as the IOPC. It applies to activities that are commercial in nature. We consider that the contract value and falls within this description.</p> <p>In this case we are considering the IOPC’s own commercial interests and our ability to conduct effective future procurement activities and negotiations.</p>
<p><u>Ref</u> <u>5024289</u> Back to top</p>	<p><u>Vacancy for role of investigator</u></p>
<p><u>Request</u></p>	<p><i>You requested information regarding the ‘last advertised vacancy for the role of investigator’</i></p>
<p><u>Response</u></p>	<p>We have addressed each part in turn.</p>

1a) The number of applicants..

A total of 852 individuals applied for the role.

1b) The number of applicants who progressed to interview

A total of 202 candidates were invited to interview.

1a) The number of applicants who 'passed' interview stage

107 candidates passed the minimum threshold score of 62.5%

2) Please provide the pay scale for the role of Trainee Investigator and Investigator

Trainee Investigators grade 9 - £28,050

Investigators grade 10 - £31,110

In addition, for Canary Wharf and Croydon roles, London Weighting allowance of £4527 is payable.

3) Please provide a copy of any guidance documents or presentations regarding the training for investigators (or any staff) on the use of your internal casework management system.

As part of a new casework manager's induction training, an experienced member of staff introduces the case management system to them and then acts as a point of contact to help them use the system as they become familiar with their role. As part of the core training input for new investigators of all grades they are briefly introduced to the case management system as part of a training package covering systems and processes. Experienced team members then advise new staff members and acts as a point of contact during the course of their work.

Staff are referred to self-directed resources such as ICT service centre guides to support their performance and development in the case management system.

There is a total of 167 items on the Operations Manual that relate to our case management systems and could potentially fall within the scope of this part of your request as 'guidance documents' on the use of the internal case work management system. This encompasses system manuals, technical guidance, 'How to' type guidance and other system based documents.

Section 12 of the FOIA allows the IOPC to refuse a request when the estimated cost of carrying out certain activities exceeds £450, or 18 hours at £25 per hour.

	<p>We have estimated that the work involved in complying with this part of your request would exceed the cost limit under section 12 of the FOIA, with the result that we are not required to disclose the information to you.</p>
<p><u>Ref</u> <u>5024267</u> Back to top</p>	<p><u>IOPC Equality strategy and training</u></p>
<p><u>Request</u></p>	<p>Please provide sight of the IOPC:</p> <ol style="list-style-type: none"> 1. Equalities strategy and any related handbooks and other documented guidance in respect of disabled customers, specifically to include customer requested reasonable adjustments, and the associated logging and provision, 2. Equalities training for IOPC customer-facing staff, to include duration and format, specifically to include customer requested reasonable adjustments, and the associated logging and provision.
<p><u>Response</u></p>	<p>In regard to the first part of your request, we hold the following information:</p> <p>Objective 2 of our Equality, Diversity & Inclusion Strategy 2022-25 relates to service users service users. This is: “To deliver an equitable, culturally competent service to all of those we come into contact with throughout our work”. Please see pages 10 to 12 for further information.</p> <p>Information about how we comply with public sector equality duty is available on this web page: The law, reporting and monitoring Independent Office for Police Conduct</p> <p>Our business plan sets out our planned work for 2022/23 and includes our strategic priorities, key targets and the management information we will be monitoring.</p> <p>The information on our website also includes this:</p> <p><i><u>“Meeting the needs of service users and colleagues</u></i> <i>We will always consider how to adjust our service to meet the needs of the people who use our service. However, our colleagues deserve to work without receiving abuse or other unacceptable contact, and we will support our colleagues to manage these difficult situations effectively.</i> <i>We will make reasonable adjustments (relating to a protected characteristic¹), for example provide communications in large text format for someone who is visually impaired, or support people to make complaints over the phone in the way we deliver our services. We may still consider it appropriate to restrict contact with people who have a reasonable adjustment in place. This will be a last resort and will depend on all the circumstances of the case.</i></p>

While we routinely communicate with people experiencing trauma or distress, occasionally we may consider that a person is particularly vulnerable or at risk. If we believe a person is in immediate danger, we will contact emergency services. Our actions and decisions within this policy will be recorded for the benefit of both people who use our service and colleagues.”

Our Operations Manual contains all of the guidance, templates and documents that are required to carry out our operational work and provides guidance for staff. We have included relevant extracts relating to reasonable adjustments. This includes: ‘ Making Reasonable Adjustments; Direct Complaint Reasonable Adjustment Guidance; Reasonable Adjustments within the Process for Handling Reviews and Reasonable Adjustments when taking face to face witness statements.

Relevant extracts from the Operations Manual

Reasonable adjustments

- [1. Overview](#)
- [2. Making reasonable adjustments](#)

Making Reasonable Adjustments

When to ask if a reasonable adjustment is required

Although the Public Sector Equality Duty is proactive, there is no requirement for staff to ask every service user if they need a reasonable adjustment. Staff should use their own discretion to judge when it is appropriate to ask the question and ensure that sensitive language is used.

For example, it would be appropriate if it is clear from the complaint documentation that the service user has a disability or if the complaint is related to the failure of the police to take account of a disability.

Reasonable Adjustments in direct complaints

Please see [this page](#) for guidance specifically relating to the Customer Contact Centre (CCC) and direct complaints.

Deciding if an adjustment is reasonable

When deciding whether an adjustment is reasonable consideration should be given as to:

- how effective the change will be in assisting disabled people in general or a particular service user
- whether it can actually be done
- any costs involved
- if there is a cheaper solution that will give the same outcome
- the size and resources of the IOPC

Staff should assess the request against the above criteria. If the request is for a minor change to process (e.g. change in font size) then this can be arranged without approval.

Example of a reasonable adjustment

A complainant suffers from severe cataracts and requests that all correspondence is typed in size 20 font. This adjustment is reasonable as it would not have a significant impact on IOPC resources and it would not incur an excessive cost.

The following is a relevant extract from the entry regarding the Process for reviews following other handling:

Complainants who may need additional assistance (and/or reasonable adjustments)

The appropriate authority should have also taken into account any communication needs the complainant may have, or any impairment or health condition which might place an obligation to make reasonable adjustments under the Equality Act 2010. It may be necessary that the information about the progress and the outcome of the handling is to be provided in a different format. If the complainant has raised this in their review application, the reviewer should consider whether the reasonable adjustments as specified by the complainant can be accommodated. If the complaint handler has not taken into consideration a reasonable adjustment requested to the detriment of the complainant, then the reviewer should consider whether this omission had impacted upon the handling of the complaint resulting in the outcome not being reasonable and proportionate. See further guidance under 3.x Considering flaws in the handling of a complaint.

Refer to [Statutory Guidance](#) Chapter 11 paragraph 11.8.

¹Regulation 35, Police (Complaints and Misconduct) Regulations 2020

The following is a relevant extract from the best practice guidance taking face to face witness statements:

Arranging to meet the witness

Establish if the witness requires any reasonable adjustments prior to meeting with them. If you are unsure about this or need advice, speak with the case supervisor, and consider engaging with the Investigative Interviewing Operational Practitioner Group (OPG).

[The OPG helps us to assess the quality and delivery of interviews as well as help us to identify learning opportunities and areas of improvement.]

However, if implementing a request will have a significant financial cost or impact on the resources or capacity of their team, then staff **MUST** consult with their line manager. Staff should also consult with their line manager if they intend to refuse to implement a request. **Example of a reasonable adjustment**

A complainant suffers from severe cataracts and requests that all correspondence is typed in size 20 font. This adjustment is reasonable as it would not have a significant impact on IOPC resources and it would not incur an excessive cost.

Direct Complaints Guidance

5. Direct complaint reasonable adjustments guidance

Direct complaint reasonable adjustments guidance

When to ask if a reasonable adjustment is required

Although the PSED is proactive, there is no requirement for staff to ask every service user if they need a reasonable adjustments. Staff should use their own discretion to judge when it is appropriate to ask the question and ensure that sensitive language is used.

For example, if it is clear from the complaint documentation that the service user has a disability or if the complaint is related to the failure of the police to take account of a disability, then the question should be asked.

Deciding if an adjustment is required

When deciding whether an adjustment is reasonable consideration should be given as to:

- How effective the change will be in assisting disabled people in general or a particular service user
- Whether it can actually be done
- Any costs involved
- The size and resources of the IOPC

Any request needs to be balanced against all of the factors above. If the request is for a minor change to a process (e.g. a request for a change in font size) then Customer Contact Advisors can decide to implement the request and not follow the approval process set out below.

If the implementation of a request would have a resource implication on the CCC or if the Customer Contact Advisor thinks that it should be refused, then the request must be assessed and approved by a Contact Centre Manager. The step by step process guide at the end of this guidance explains how this approval is requested.

In relation to the second part of your request we can provide the following information:

All *new* IOPC staff complete a digital learning module during their induction called "Understanding Equality and IOPC expectations". This course is 40 minutes long and contains 9 lessons as follows. The section on reasonable adjustments is about what we must do for employees and stakeholders.

- The Equality Act (2010)
- Protected characteristics
- Unlawful discrimination
- Duty to make reasonable adjustments
- When are reasonable adjustments required?
 - When the duty arises
 - The anticipatory duty
 - Where the duty applies
- Assessing reasonable adjustments
- Bias and stereotyping
- Assessment (test)

Further learning for customer facing staff covering equalities training in respect of service users with a disability, in particular neurodiversity, is covered in three IOPC e-learning courses. These are listed below together with the course summary for our staff.

- Neurodiversity - Language and communications: This module will provide you with a guide to appropriate use of language surrounding neurodiversity and how to communicate with neurodivergent people.
- Neurodiversity at the IOPC: In this module you'll find out about the benefits of a neurodiverse workplace, listen to the lived experiences of neurodivergent colleagues at the IOPC and reflect on your understanding of 'disability' and 'difference'. The module will help build awareness and understanding of neurodiversity and how neurodiverse individuals can be affected.
- Neurotypes: This module describes some of the more common neurotypes along with the assumptions and challenges they face in day-to-day society and the workplace. The module will also highlight the benefits of different neurotypes in the workplace.

There are also ad-hoc awareness events and communications covering these topics. These are hosted by our staff networks.

To support this work we have a cultural knowledge accountability approach to the work we undertake and in development of our workplace. This means that whilst we don't have a formal training programme, the organisation provides access to materials and events. We place a duty on our staff to seek out the knowledge they require to ensure inclusivity in the workplace and to ensure excellence in their work. Therefore, minimising and ultimately seeking to remove disadvantages suffered by people due to their disabilities and protected characteristics.

	<p>The Equality Act is covered under a separate e-learning course: “Introduction to the Equality Act and investigating allegations of discrimination”. This includes information on the following subjects:</p> <ul style="list-style-type: none"> • What is the Equality Act? • What are the protected characteristics? • Prohibited conduct e.g. direct and indirect discrimination, harassment, victimisation and discrimination arising from disability and failure to make reasonable adjustments • Reasonable adjustments • Inherent or unconscious bias • A section on investigating discrimination <p>This course contains information about our duties in relation to people with a disability.</p> <p>Later this year we will be launching a piece of required digital learning to all staff called “Know the Line: disability”. Although the focus for this learning is exploring disability and how attitudes and beliefs around disability in society and the workplace can hurt and exclude our staff, the course will cover many topics which are applicable to stakeholder interactions such as disability microaggression, reasonable adjustments and intersectionality.</p> <p>This is not intended as an exhaustive list as staff are encouraged to discuss with their line managers additional approaches which will best serve their needs given their current experience.</p> <p>We do not have a reasonable adjustments handbook at this time, but as noted above there are various extracts from the Operations Manual that provide guidance to staff about reasonable adjustments.</p>
<p>Ref 5024345 Back to top</p>	<p><u>Referral relating to Chief Constable Will Kerr</u></p>
<p><u>Request</u></p>	<p><i>According to Cornwall Live, you closed a referral relating to Chief Constable Will Kerr on the grounds that it was outwith your jurisdiction:</i></p> <p><i>'Almost a month later, on April 20, the IOPC closed the referral, saying that it did not consider that it had jurisdiction over the issue.'</i></p> <p>https://www.cornwalllive.com/news/cornwall-news/kerr-frustrating-delay-suspending-sex-8635108</p> <p><i>Please provide recorded information to explain your decision that you had no jurisdiction over the issue.</i></p>
<p><u>Response</u></p>	<p>When the initial referral was received from the Police and Crime Commissioner (PCC), on 23 March, it was limited to the allegations of criminal conduct, which is something we didn't have the authority to investigate as it is alleged to have happened outside our jurisdiction. We advised the PCC on 20 April having</p>

	<p>considered our position and following discussions with the Police Service of Northern Ireland.</p>
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Following discussions with the Police Ombudsman of Northern Ireland, on 19 July we requested a second referral from the PCC so that we could investigate the alleged misconduct issues which do fall under our remit. We received that on 25 July and decided to independently investigate on 26 July.