

Independent Police Complaints Commission

IPCC Corporate Plan 2015/18

The Corporate Plan is our strategic planning document, providing a framework for the delivery of our work. It is a clear statement of our values, mission, vision, and objectives for the next three years.



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Chair and Chief Executive's foreword

This Corporate Plan covers the period of a major Change programme at the IPCC. Following the Home Secretary's announcement in early 2013 that she wished the IPCC to independently investigate all serious and sensitive cases, we were given additional resources in 2014/15 in order to build up the capacity to do so. During 2015/16, we aim to take on between 400 and 700 new investigations, rising to over 1,000 in 2016/17 and subsequent years.

This has not just required a significant increase in capacity, taking on additional office space and hundreds of new staff. It also involves developing our capability, through radical changes to our organisation, processes and structure, to support this greatly increased workload. At the same time, we need to ensure that we can continue to exercise effective oversight of the complaints system as a whole, to drive public confidence.

Last year was the beginning of that process. We made some top level changes to our leadership and organisational structure, recruited and trained new investigators, and expanded our offices. We more than doubled the number of investigations taken on, closed more investigations than in any previous year and cleared the backlog of appeals (see our Annual Report 2014/15 for details). The next three years will see the transformation of all our processes and structures so they can support a much larger organisation.

This is a challenging time for the IPCC, as we accelerate the Change programme and continue to manage unpredictable levels and scale of demand. The Hillsborough investigations continue, part of the largest criminal investigation ever carried out. More recently, we have taken on a significant number of child sexual exploitation allegations in a number of forces, some historic and some more current. Our appeals work continues to show that on too many occasions complaints are poorly handled at the outset.

Being equipped to undertake many more investigations will not, by itself, increase public confidence or address fully public concerns. There is also a need for greater oversight of the police complaints system as a whole. Our work with forces has already driven some improvement in the way the majority of complaints are handled, and we will continue this work. At the same time, our new power to require responses to our recommendations can make sure that learning from complaints and from our own investigations improves policing more generally.

Working with others, inside and outside policing, we can make sure our cases and the complaints system as a whole are part of a circle of learning and improved policing in England and Wales. This will be of benefit to both the public and the police service.

However, it is clear from our oversight work that the complaints system itself is over-complex and over-bureaucratic. We have therefore contributed to government consultations on reforms to the complaints and discipline systems, and an important part of our work in the coming years will be to contribute to, and help implement, the legislative proposals that are being developed in response.

This Corporate Plan is a clear statement of our values, mission, vision, and objectives for the next three years. It is supported by our Business Plan for the coming year, which provides more detail of the work we will be doing and the projects we have in place.



A handwritten signature in black ink that reads "Anne Owers".

Dame Anne Owers,
IPCC Chair



A handwritten signature in black ink that reads "Lesley Longstone".

Lesley Longstone,
Chief Executive



1 Who
we are

1. Who we are

The IPCC oversees the police complaints system in England and Wales and sets the standards by which the police should handle complaints. It has a statutory obligation to secure and maintain public confidence in the police complaints system. The IPCC investigates serious and sensitive cases, and handles some appeals, independently of the police, government and interest groups.

1.1 Our values

The IPCC has five values that underpin our work. The values influence our plans, service delivery and engagement with complainants, the police and other stakeholders. They are also reflected in the recruitment of staff and commissioners and in the way the organisation is run. We hold ourselves to account for our behaviour under the values through our performance and development review process.

Our values are:

- **Justice and respect for human rights**
- **Independence**
- **Diversity**
- **Integrity**
- **Openness**

1.2 Our mission

Our mission is to improve public confidence in the police complaints system.

1.3 Our vision

Our vision is that we are trusted to seek the truth and hold the police to account.

1.4 Our remit

The IPCC was established by the Police Reform Act 2002 and began work in April 2004. Our primary statutory purpose is to secure and maintain public confidence in the police complaints system in England and Wales. Police forces deal with the majority of complaints against police officers and police staff. We consider appeals from people who are dissatisfied with the way a police force has dealt with their complaint. Since November 2012, the responsibility for determining appeals is shared with local police forces.

In addition, police forces must refer the most serious cases involving the police – whether or not someone has made a complaint – to the IPCC. Serious cases include those where there has been a death or serious injury, or allegations of serious assault or serious sexual offence. We may decide to investigate such cases independently, manage or supervise the police force's investigation, or return it for local investigation.

We also have powers in relation to a small number of organisations that have police-like powers, but are not police forces. This includes the National Crime Agency (NCA), Her Majesty's Revenue and Customs (HMRC), and some activities of Home Office immigration and enforcement staff. Through the Anti-Social Behaviour, Crime and Policing Act 2014, we have a statutory remit over all staff who work for the College of Policing. In addition to this, we investigate criminal allegations against Police and Crime Commissioners (PCCs) and their deputies.

The Anti-Social Behaviour, Crime and Policing Act 2014 has also extended the IPCC's jurisdiction to cover contractors working for the police. This will address the gap where contractors had or have had involvement in our cases, but were not subject to the same scrutiny as police officers or staff.

Our remit includes oversight of the complaints system as a whole, no matter where complaints are handled. We make sure there is accountability when things go wrong and use learning from our work to influence changes in policing to reduce the chances that those things happen again.



2 Achieving our vision

2. Achieving our vision

2.1 Operating context

The IPCC and the wider complaints system face challenges over the next three years, which include: the Home Secretary's decision that the IPCC should independently investigate all serious and sensitive cases, and our resulting Change programme; ambition for improvement emerging from our work into cases involving a death, and our oversight and confidence and stakeholder engagement strategies; and uncertainty across the public sector, given the financial and economic context and the 2015 general election.

Serious and sensitive cases

In February 2013, the Home Secretary made a statement to the House of Commons that included plans to address public concern about the integrity of the police. In this context, the Home Secretary said she would *“transfer to the IPCC responsibility for dealing with all serious and sensitive allegations.”* This was accompanied by providing additional resources, which we are using to significantly change our structure and operating model. This will allow us to deliver an increased number of independent investigations and deliver

what stakeholders and the general public expect to see from an independent body charged with policing the police.

This expansion is intended to take place over three years, and involves a significant Change programme, which we are one year into¹. Cases we will investigate independently will include more of those that are currently referred to us, for example those alleging use of excessive force, corruption or failure of duty. We would also expect to take on more cases where there are vulnerable victims, such as domestic violence, rape, or child exploitation. Our view is that investigating 'sensitive cases' means the IPCC having the flexibility to take on cases which may not be individually 'serious' but collectively affect public confidence or otherwise cause concern. This might be a national issue or an issue in a particular area or for a particular community.

Public confidence

Our public confidence survey² looks at public perceptions of the police, the complaints system, and the IPCC³. The most recent survey (2014)⁴ shows that most of the population of England and Wales has heard of the IPCC and is confident in using the complaints

¹ Further detail is outlined in Section 3.4.

² www.ipcc.gov.uk/page/public-confidence

³ Ipsos MORI carried out the survey on our behalf and spoke to more than 4000 people in England and Wales.

⁴ Harvey, P., Shepherd, S. and Magill, T. (2014) Public confidence in the police complaints system: a survey of the general population in 2014, London: Ipsos MORI (commissioned by the IPCC).

system⁵. It also shows, however, that there are significant sections of the population, most notably ethnic minority communities and young people, who have not heard of the IPCC and who do not trust either the complaints system or the IPCC's independence⁶.

The majority of the public feel confident they would know how to make a complaint if they wanted to, though a significant number say they are not confident, particularly those in the youngest age group (15 to 24). Ethnic minority respondents to the survey are less likely to be in contact with the police and are less likely to be happy with the contact they have. They also remain significantly less likely to complain about the police if they are unhappy, and are more likely to feel that making a complaint would take up too much of their time. They are also more likely to be concerned about police harassment or other consequences because of making a complaint.

There are also groups, such as those with mental health conditions, that we believe are excluded from accessing the complaints system. We have begun putting in place a range of plans intended to improve the way we work and, in particular, the way we engage with our

stakeholders to improve public confidence in the police complaints system.

Oversight of the complaints system

Independent investigations are important in securing public confidence, but being equipped to undertake many more investigations will not, by itself, increase public confidence or address fully public concerns. There is also a need for greater oversight of the police complaints system as a whole. This will improve the way the majority of complaints are handled and make sure that learning from complaints dealt with at a local level, as well as from our own investigations, influences the way the police work.

We are committed to improving complaints handling and will continue to put forward positive proposals to address gaps and weaknesses within the current system, working with stakeholders, within and outside policing to do this. We will provide regular guidance to police Professional Standards Departments in areas where mistakes are commonly made and will aim to simplify the system wherever possible. This will include working with the Home Office to promote changes to the law and taking forward work following the government's response

⁵The majority of people are aware of the IPCC (64%) and 77% of those people are confident that the IPCC deals with its work in an impartial way.

⁶Awareness varies significantly by ethnicity, with just one in three (32%) of those from minority ethnic groups aware of the IPCC compared to 74% of the White public in 2014. Younger members of the public, those aged 44 or under (50%) are also less likely to have heard of the IPCC.

to the consultation on “improving police integrity: reforming the police complaints and disciplinary systems”.

Improving police practice

The IPCC cannot change policing on its own and we need to work with others, including policing bodies such as Police and Crime Commissioners (PCCs), the College of Policing (CoP), and Her Majesty’s Inspectorate of Constabulary (HMIC), as well as service users and communities. With our partners, inside and outside the policing world, we can make sure our cases and the complaints system as a whole are part of a circle of learning and improved policing in England and Wales.

2.2 Strategic objectives

Our Business Plan sets out how we will work towards our strategic objectives each year and how we will measure the outcomes. Commission and Management Board will monitor progress throughout the year to make sure we are on track to deliver them. Risks to achieving our strategic objectives will be managed through our risk management framework⁷ and we will report on our progress in meeting the strategic objectives at the end of the year in our annual report.

Strategic objective 1

Improve the confidence of those groups who have least confidence in the police complaints system

How will we achieve this?

As set out in our operating context, the results of our public confidence surveys show that young people and those from BME communities are more likely to think their complaints will not be taken seriously and to fear negative consequences if they make a complaint. We also know that some groups find it hard to access the complaints system, for example those people with mental health conditions. Through our public confidence survey, we will monitor levels of confidence of all communities, and will undertake to improve the confidence of those with least.

We will seek to improve confidence overall through using our oversight responsibilities well and ensuring the quality of the IPCC’s investigation and appeals work. In 2014, we published our oversight and confidence strategy⁸, which sets out how we will improve the way complaints about the police are handled, how we will make sure that our work enhances police accountability, and how we plan to work with other agencies and

⁷ See section 3.7 for further details.

⁸ www.ipcc.gov.uk/page/oversight-and-confidence-and-engagement-strategies

oversight bodies to improve policing. These goals will remain at the heart of the IPCC as we embark upon a period of change.

But we are conscious that more is needed to address the lack of trust that certain parts of society have in policing and in the ability of the IPCC to hold the police to account. Our stakeholder engagement strategy⁹, also published in 2014, details our commitment to developing a more customer focused approach to our work and to improving how we anticipate and respond to issues that affect the public, complainants, bereaved families, and a range of other stakeholders.

We want to develop stronger relationships with our stakeholders at national, regional and local levels, to improve our understanding of their needs, and involve them in the shape and design of both our services and the wider complaints system. The changes we are making include better engagement with people who may be little heard and those who have least confidence in the complaints system. We will do this through improved communication, consultation, events, and the use of social media to connect with new audiences.

Strategic objective 2

Deliver an increased number of timely and high-quality independent investigations

How will we achieve this?

Respondents to the Home Office consultation on “improving police integrity: reforming the police complaints and disciplinary system” said more independence from the police itself would increase confidence in the police complaints system. Working towards the investigation of all serious and sensitive cases will therefore play a crucial role in improving public confidence in the police complaints system.

Our Change programme is focused on recruiting and training new staff for the IPCC to support an increased number of independent investigations over the next three years. We will continue to receive and assess referrals in order to decide the mode of investigation. We will conduct managed and supervised investigations where appropriate, though the government wants these options to become much less common over time. As well as increasing the throughput of investigations, we need to improve the timeliness of our investigations.

During 2014/15, we recruited over 100 new investigators, all of whom will have

⁹ www.ipcc.gov.uk/page/oversight-and-confidence-and-engagement-strategies

completed training by the end of the financial year. We have also expanded our office space in Wakefield and opened a new office in Birmingham. We will continue to recruit as necessary, and will open a further office in South London in 2015/16. In addition to expanding our staff base, the Change programme will test and put in place new ways of working, leading to process, quality, timeliness and productivity improvements.

We will embed quality systematically in investigations and appeals by agreeing a new quality strategy and establishing a new Operations Review Unit within the Operations Directorate.

Strategic objective 3

Ensure that the IPCC operates a timely and high-quality appeals process

How will we achieve this?

All appeals about the recording of complaints are dealt with by the IPCC. We also deal with any appeals about the conduct of senior officers or appeals that have been or must be referred to the IPCC¹⁰. These include appeals about an investigation of a serious assault, or criminal offences and behaviour liable

to lead to misconduct proceedings, which in either case is aggravated by discriminatory behaviour.

We have made significant progress in clearing an historic appeals backlog over the past year and have also changed the way we conduct and report appeals following our appellant survey and feedback from forces. These changes have led to a marked improvement in the quality of our appeals work. We will continue to put quality at the centre of what we do and will build on this as we change our operating model.

Our strategic focus over the life of this plan will be on the timeliness and efficiency of our appeals process, while making sure that the quality of appeals work is maintained. The government has set out its plans for Police and Crime Commissioners (PCCs) to take on some appeals work from police forces and we will work with forces and PCCs to support this change.

¹⁰ Following a change in the legislation in November 2012, forces can handle some appeals themselves depending on the Relevant Appeal Body Test. This test is set out in the Police (Complaints and Misconduct) Regulations 2012 to determine whether other appeals should be dealt with by the IPCC or by the relevant chief officer (See IPCC Statutory Guidance (para 1.27-1.28)).

Strategic objective 4

Improve the quality of police forces' own complaints handling

How will we achieve this?

Our oversight and confidence strategy sets out how we will use a variety of information and intelligence to assess how well complaints and appeals are being handled by forces.

Key to this is implementing our knowledge and information management (KIM) strategy which sets out how we will use data and intelligence, drawn from inside and outside of the organisation, to inform our work. This will include the information and learning we capture when we process cases; data we collect from forces about their complaints handling; as well as intelligence from our work with stakeholders and community groups. We will use this to develop an intelligence model to assess emerging trends and risks which will inform our oversight work, as well as decisions on referrals and appeals.

Our commissioners and Force Liaison Team will work with forces to understand their performance and challenge them to improve where necessary. By issuing Statutory Guidance and other guidelines we will make sure that forces are aware of the expected standards and improve consistency across the complaints system.

Better handling of complaints first time around will lead to greater confidence, trust and satisfaction resulting in a reduction in appeals and fewer appeals being upheld. This will be of benefit to both the public and the police service.

The government wants a greater role for PCCs in the future handling of complaints. This will mean the development of new processes, information and guidance for PCCs, forces and members of the public, which we will support.

Strategic objective 5

Improve policing practice as a result of learning from our investigations and appeals work

How will we achieve this?

Implementing our KIM strategy will help make sure we are capturing, using and sharing the knowledge and information we have as an organisation. A more structured and strategic approach will allow us to identify the latest trends in police complaints. We will also be able to identify and track responses to the recommendations we have made, allowing us to measure the impact our work is having.

We will also strengthen our capacity to work with PCCs, the College of Policing (CoP), Her Majesty's Inspectorate of

Constabulary (HMIC), and police forces to make sure that learning from complaints and investigations is identified, implemented and embedded in policing at all levels of the service. This will help to improve and inform performance, standards and training for the police, and prevent further issues from arising.

Strategic objective 6

Ensure that the IPCC is fit for purpose, agile, able to manage significant expansion and representative of the communities we serve

How will we achieve this?

Our Change programme will run until 2017, at the end of which we will have designed, developed and implemented a new organisation that can deal effectively and efficiently with the significant increase in the number of independent investigations, as well as continuing to oversee and drive public confidence in the police complaints system as a whole.

Our values will remain at the heart of the organisation as we expand and we will make sure that all aspects of our Change programme are tested against those values. We are committed to promoting equality and diversity and supporting a culture within which we actively value difference.

We will deliver improvements in our processes, how we work with other

organisations in the system, our management of information, our capability, and our performance. These changes will be supported by a new estates strategy, as our physical presence expands, a new IT infrastructure, and importantly a new people strategy.

We recognise that our ability to deliver our strategic objectives rests to a very large degree on the commitment of our staff. We are committed to supporting them and their managers in leading and dealing with change, while continuing to perform to a high standard in delivering our core services.

2.3 Working with others

We are committed to developing stronger and more constructive relationships with our stakeholders at national, regional and local levels as set out in our stakeholder engagement strategy.

We regularly work with:

- **Community organisations** who have a particular interest in one or more of our investigations and are able to help us understand the context and communication needs of local communities.
- **Advocacy groups** who support particular sectors of society and who are able to help us understand the needs of these users of our services.

- **The Home Office**, which sets the legislation in relation to the police complaints and discipline systems. The IPCC provides feedback, based on practical experience, to the Home Office on any proposed changes to legislation or to Home Office guidance.
- **Chief Constables**, who are responsible for many of the decisions in relation to complaints and conduct matters in their force. Chief Constables are also responsible for putting in place any changes in policy for their force which come about as a result of investigations.
- **Professional Standards Departments**, which are the lead areas in forces for handling complaints and conduct matters.
- **Police and Crime Commissioners and the Mayor's Office for Policing and Crime**, who are elected by the public. They are responsible for many of the decisions about complaints and conduct matters for their Chief Constable and for holding the Chief Constable to account.
- **Her Majesty's Inspectorate of Constabulary (HMIC)**, which reports on the efficiency and effectiveness of each police force in England and Wales. Information from IPCC cases and data that we gather about complaints feeds into the inspections carried out by HMIC.
- **The College of Policing**, which sets the standards for policing and is the professional body for everyone working

in policing. The IPCC uses its experience to provide feedback to the College of Policing on changes to the guidance they issue; in return, it provides information on policies and training to assist with our investigations.

- **The Coroner** whose own proceedings in cases involving a death can have implications for the progress and timing of police conduct investigations.
- **The Crown Prosecution Service** whose advice we seek in cases where there may be an indication of criminality and from whom we seek a charging decision if criminal proceedings are considered.

We will continue to work with those who use, may use or are affected by the complaints system (and their representatives) to make sure that we improve our understanding of their needs, and involve them in the shape and design of both our services, and the wider complaints system. We have set up a group of external stakeholders to help our expansion, including community and voluntary sector representatives covering a range of areas such as mental health, BME and domestic violence.

Other ways of engaging with stakeholders will include:

- Working with external reference groups, including voluntary and community sector and academic representatives to

provide critical challenge and insight.

- Commissioning interest and advocacy groups to engage service users on our behalf.
- Hosting a series of regional engagement events.

2.4 What does success look like?

We expect that the changes we make will mean that the IPCC feels different for our stakeholders and those we serve:

- **For the public...**
The public trusts us to hold the police to account.
- **For complainants, people affected by conduct matters and appellants...**
A helpful and professional organisation that is trusted to seek the truth, be robust in holding the police to account and committed to providing a good service.
- **For families...**
Our strong customer focus and the robust approach that we take to the quality of our work are particularly clear in our interaction and communication with families.
- **For the police and other organisations under our remit...**
A professional, independent and fair organisation.

- **For our partners in the system...**

A well run organisation that provides timely and high-quality outputs. An organisation that systematically captures meaningful intelligence from its work and proactively shares that information to improve practice, standards and training.

- **For our commissioners and staff...**

We are known for the high-quality of our work and the commitment of our people. Our values are reflected in everything that we do and we are proud of the difference that we make.



3 Our
work

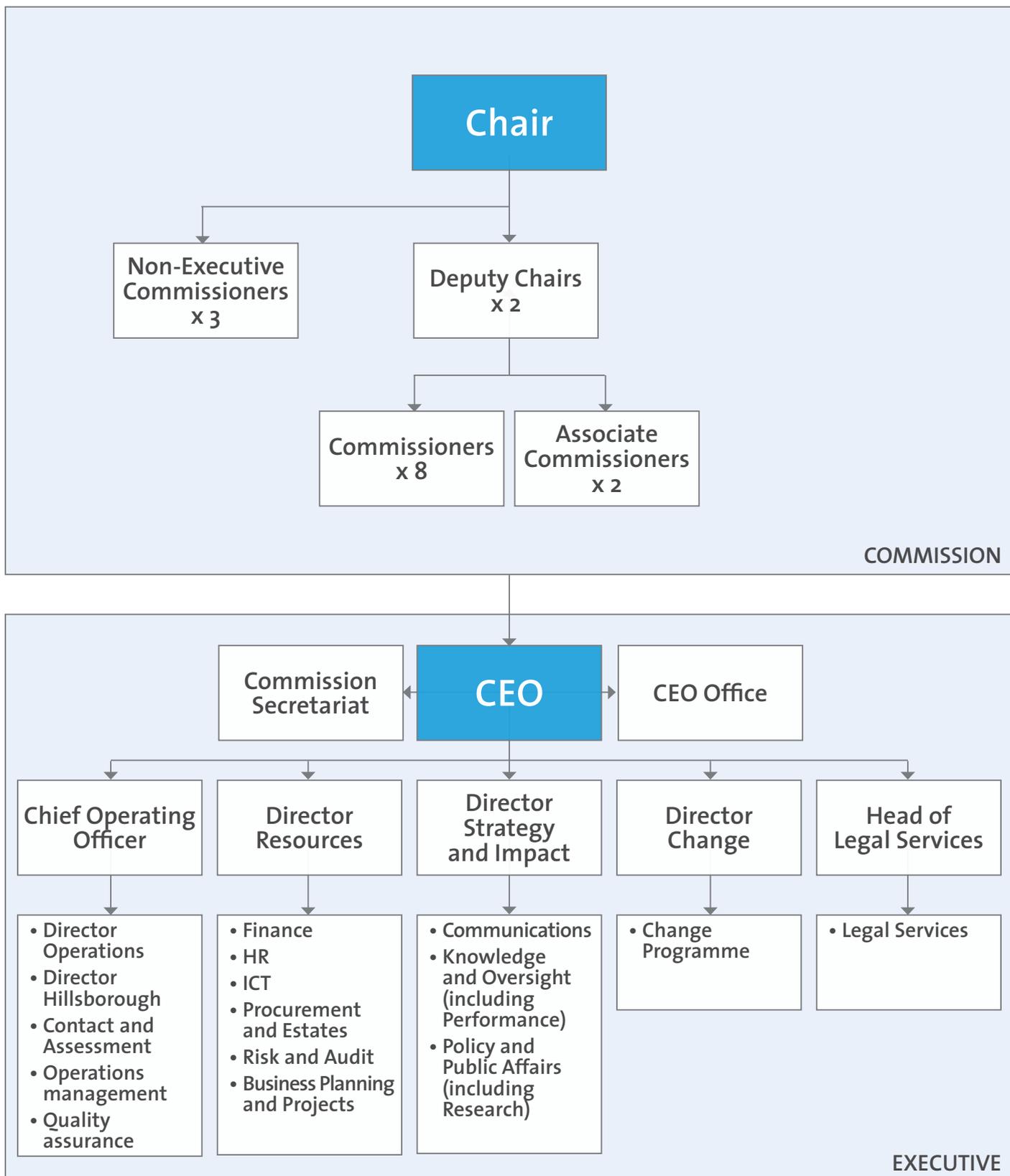
3. Our work

3.1 Structure

The IPCC is overseen by the Commission, which is currently made up of the Chair, ten operational commissioners (including two deputy chairs) and three non-executive commissioners. We also have two associate commissioners. The Chair and all commissioners must not have worked for the police in any way before their appointment. The Chair, deputies, operational commissioners, and non-executive commissioners have responsibility for governance of the organisation, while deputies, operational, and associate commissioners have force liaison responsibilities and oversee specific investigations allocated to them.

The Commission is supported by a Chief Executive who leads a staff of approximately 800 people and is also the Accounting Officer. The Chief Executive is supported by a Management Board including a Chief Operating Officer, with responsibility for Operations including Hillsborough, and three directors with responsibilities for Strategy and Impact, Resources, and Change. The Head of Legal Services also attends Management Board.

We have offices in Birmingham, Cardiff, London, Sale, Wakefield and Warrington. Appeals work from across England and Wales is allocated nationally, making sure that we make the best use of our resources and provide a consistently high-quality service, regardless of location. Investigations are mostly allocated geographically.



3.2 Operations

Investigations

The most serious complaints recorded by forces must be referred to us and certain types of incident must be referred to us even where there has been no complaint. For example, when someone has died or been seriously injured following direct or indirect contact with a police officer, police staff member or staff from Her Majesty's Revenue & Customs (HMRC), National Crime Agency (NCA), or immigration staff in the Home Office¹¹ using enforcement powers. Serious complaints and allegations of misconduct could involve:

- a death or serious injury
- allegations of serious or organised corruption
- allegations against senior officers
- allegations involving hate crime
- allegations of perverting the course of justice

When the IPCC receives a referral, we can decide to return it to the force to be dealt with through local resolution or a local investigation. Alternatively, we can investigate in a number of ways:

IPCC independent investigations

These are carried out into incidents that cause the greatest public concern, have the greatest potential to impact on communities, or have serious implications for the reputation of the police, HMRC, NCA, or the Home Office.

IPCC managed investigations

These are conducted by police Professional Standards Departments, or investigators from HMRC, NCA, or the Home Office, but under the direction and control of the IPCC. Managed investigations into serious cases are undertaken for a variety of reasons including the need to use specialist resources or skills not available within the IPCC, and the interaction of an investigation into police misconduct with other investigative activity. Managed investigations are usually undertaken when the allegation is of such significance and probable public concern that its investigation needs an independent element.

IPCC supervised investigations

These are carried out under the direction and control of the police Professional Standards Departments or investigators from HMRC, NCA or the

¹¹ On 26 March 2013 the Home Secretary announced the decision to end the Executive Agency status of the UK Border Agency (UKBA) and bring its functions back within the Home Office as UK Visas and Immigration (UKVI), UK Immigration Enforcement (UKIE) and UK Border Force (UKBF). The IPCC has continued to have jurisdiction over those officials and contractors who carry out functions for the Home Office. The IPCC is responsible for the way that certain types of serious complaints against Home Office staff are handled. We make sure that these complaints (including those against contracted staff employed by UKBF or the Home Office to carry out certain functions on their behalf) are dealt with effectively.

Home Office. The IPCC sets the terms of reference and receives the investigation report. Supervised investigations apply in cases where we decide that a case is of considerable significance and probable public concern.

If Police and Crime Panels¹² receive an allegation that the Police and Crime Commissioner (PCC), or their deputy has committed a criminal offence, they must refer that to the IPCC. They are responsible for the initial recording of complaints and conduct matters against PCCs, and will also handle any complaints that do not involve allegations that a crime has been committed. When we receive a referral, we decide whether the matter needs investigating, and if so, conduct an independent investigation or manage an investigation by the Professional Standards Department, or other relevant department of a police force that we select.

After examining the evidence, our complaint investigations (where neither misconduct nor criminality is an issue) conclude by deciding whether a complaint is ‘upheld’ or ‘not upheld’. A decision of ‘not upheld’ is made if an investigation concludes that the treatment a person received was reasonable. Each decision will always be accompanied by a full explanation of

what an investigation has found:

Prosecution

In managed or independent investigations where a criminal offence may have been committed, we will liaise with the Crown Prosecution Service (CPS). At the end of the investigation, we may refer the case to the CPS, which is then responsible for deciding if criminal charges should be brought. Any subsequent verdict and sentence is a matter for the courts.

Disciplinary action

In cases where it is alleged that a police officer may have committed misconduct, we will pass our investigation report to either the relevant police force or PCC (depending on the seniority of the officer concerned). The investigation report will include findings of whether there is a case to answer for misconduct or gross misconduct (behaviour which if proved would justify dismissal) concerning the officers under investigation. We can require a police force to hold disciplinary proceedings in an independent or managed investigation, but the findings and any outcome are decided by the panel held by the police force. We can also require a police force to hold unsatisfactory performance procedures

¹² In London, the London Assembly’s Police and Crime Committee deal with any allegation relating to the Mayor in this capacity.

for officers whose performance is a concern – again the outcome of these procedures is decided by the performance panel.

Sharing learning

Investigations may find organisational learning, and we make recommendations for changes to systems and processes in order to prevent the same thing happening again. We may also find examples of poor performance, where personal learning or development opportunities can be used in order to address or improve an individual's performance in the future. Now that forces are required to respond to our recommendations and provide an action plan, we will track those responses to understand better the impact we have.

At the end of an investigation, we will pass our investigation report to the relevant police and crime panel and publish the reports to share the outcomes and learning.

Appeals

Direct complaints

Our staff offer advice to complainants on how to make a complaint. Complaints are passed on to the relevant appropriate authority¹³ to record and resolve. Depending on the details, the appropriate authority may then either deal with the complaint or refer the matter to us.

Non-recording and other appeals

Our staff also oversee and make decisions on appeals from complainants about police non-recording of complaints and certain other appeals. All appeals about the recording of complaints are dealt with by the IPCC. We also deal with any appeals that relate to the conduct of a senior officer and those that are made in relation to complaints that have been or must be referred to the IPCC: for example, appeals that relate to an investigation of a serious assault or criminal offences and behaviour liable to lead to misconduct proceedings and which in either case is aggravated by discriminatory behaviour. A test is set out in the Police (Complaints and Misconduct) Regulations 2012 to decide whether other appeals should be dealt with by the IPCC or by the relevant chief officer¹⁴.

¹³ The appropriate authority is either: the chief officer of the police force (usually the chief constable); the Police and Crime Commissioner responsible for the police force complained about; the Mayor's Office for Policing and Crime (if a complaint is about the Commissioner of the Metropolitan Police Service); the Common Council for the City of London (if a complaint is about the Commissioner of the City of London police).

¹⁴ This is taken from the IPCC Statutory Guidance to the police service on the handling of complaints: www.ipcc.gov.uk/page/statutory-guidance.

Applications from the police to discontinue investigations or disapply the requirements of Schedule 3 of the Police Reform Act 2002

In addition, staff oversee and make decisions on discontinuing investigations or disapplying the requirements of Schedule 3 of the Police Reform Act 2002 in relation to a complaint. In certain limited circumstances appropriate authorities have the discretion to disapply Schedule 3 of the Police Reform Act 2002 or to end an investigation early where specific grounds are met. This means that they may be able, in certain limited and specified circumstances, not to deal with the complaint in accordance with the Act. They may instead handle the complaint in any way they see fit, or discontinue a local investigation without applying to the IPCC for permission. Where the appropriate authority has used this discretion, the complainant may have a right to appeal the disapplication or discontinuance decision. Where the appropriate authority does not have the power to disapply or discontinue, they may apply to the IPCC for permission to do so.

3.3 Strategy and Impact

As part of the IPCC's role in securing and maintaining public confidence in the complaints system, the Strategy and Impact Directorate plays a leading role in using the learning from the organisation's work to improve the system and influence changes in policing. We seek to influence policing policy, through our work with the Home Office and external stakeholders, and policing practice, by ensuring that key findings from our work are understood and responded to by individual police forces. The directorate is also responsible for improving the way complaints are dealt with, which happens primarily within forces. Underpinning and crucial to all of this is the communication of the IPCC's work to internal and external stakeholders and the public through the media.

Policy and Public Affairs

Policy and Public Affairs is a national function which provides strategic policy and public affairs advice and support for the IPCC. The team is responsible for:

- Development and delivery of **policy and research** projects to support the IPCC's work including Statutory Guidance and learning reports for forces, research into public and stakeholder confidence, user feedback, and policy positions on areas of concern. The team liaises with the Home Office to recommend changes to legislation to improve the complaints system, supports

work with parliamentarians and makes sure the IPCC has effective working relationships with key partners such as HMIC, College of Policing, PCCs, the CPS, Coroners, the NHS and others.

- The development and implementation of strategies for effective **engagement** with groups who represent users of the complaints system and other stakeholders. Making sure that the IPCC engages with those who are affected by our work, particularly in the most serious and sensitive investigations, and that they have the opportunity to influence the shape and design of our services and improvements to the complaints system.

Knowledge and Oversight

Knowledge and Oversight is a national function which supports the IPCC's operational and oversight work with forces and leads on the implementation of the knowledge and information strategy which underpins our work. It is responsible for:

- The **Force Liaison and Oversight** Team who lead the IPCC's work on oversight of the complaints system, and in particular its work with forces influencing changes in complaints handling and operational policing. They are a point of contact for forces, offering guidance on complaint handling and also lead on oversight projects to assess how forces are handling complaints and appeals.

- The **Knowledge and Information Management** team who support the IPCC's work by making sure that it is informed by effective knowledge and information management and high quality analysis of IPCC and force data. It develops and delivers a programme of analysis including the production of performance data and official statistics.

Communications

The Communications Team is responsible for the effective communication of the IPCC's work to internal and external stakeholders and the media. The team develops communications strategies and plans which use a range of methods, including digital media, to reach users of the complaints system, particularly those who have less confidence.

They take a lead role in making sure that our services are accessible to all. They have responsibility for the IPCC website and publications, including information packs for complainants and families, as well as translation policies and services.

3.4 Change

The IPCC is responding quickly to the requirement to take on significantly more independent investigations of serious and sensitive cases, as well as continuing our work to improve public confidence in the police complaints system. We have an ambitious programme of growth under way to meet the expectations that the Home Secretary set out for us in her statement on police integrity in 2013.

Our change is a three-year programme running until 2017. We will:

- Do significantly more independent investigations from 2014/15, making sure that we can independently investigate all serious and sensitive cases by the end of 2016/17.
- Make sure that quality and customer service continue to be embedded in everything we do.
- Work in new ways to deliver improved capacity and efficiency, as well as greater confidence in the police complaints system.
- Expand our staff numbers and increase our geographical footprint to meet the increasing demand.

Scaling up to deal with all serious and sensitive cases requires significant organisational change for the IPCC; we are already a year into our three-year Change programme, which started in 2014 and runs to 2017.

The first stage of this change was to recruit and train new investigators, find new premises, and make some top level changes to our leadership and organisational structure. We are now moving into a phase of transforming our processes and functions so they can support a larger organisation.

Towards the end of last year we completed design work that will define the organisation that the IPCC needs to be by 2017 when it will be independently investigating all serious and sensitive cases. The focus for the programme in the next two years will be the careful and managed implementation of this 'Target Operating Model'.

Our Change programme is organised in an integrated way, making sure that key operational and functional staff work with a core group of project managers that help in the control and delivery of planned changes and improvements. Staff from all main directorates and functions, and commissioners, are directly involved in the Change programme.

Our Change programme has a number of projects to make sure we deliver our goals. These include:

- Target Operating Model (Organisational Design)
- Operations
- People
- Estates

- Knowledge and information management
- ICT

To make sure we stay on track to deliver expansion, the Change programme implementation board oversees, leads and directs the programme. It will drive progress, advise and direct on risk mitigation and provide a bridge between programme activity and the IPCC's strategic objectives.

3.5 Equality and diversity

The Equality Act 2010 places a duty on the IPCC to consider the need to: eliminate unlawful discrimination, harassment and victimisation; advance equality of opportunity between people; and foster good relations between people.

We are committed to promoting equality and valuing diversity in all our work and to making sure that we comply with the Equality Act 2010 and other relevant equality and diversity legislation. We are supported in this work by an Equality and Diversity Group, which is led by the Chief Executive, and includes a network of directorate equality leads who work to promote equality and diversity issues and assist with the equality analysis of our work.

Strong leadership is fundamental to the pursuit of equality and diversity. The

greatest impact happens when equality and diversity are actively progressed by the most senior members of the organisation. Compliance with the Equality Act relies upon the support and example set by our leadership team who will all be visibly engaged in work to improve equality and diversity. We will continuously develop an effective and robust equalities framework in pursuit of our work to improve public confidence in the police complaints system.

Anyone coming into contact with the IPCC can expect us to:

- make reasonable adjustments in the way we deliver our services to anyone with a disability
- treat them with courtesy and respect
- follow up any comments or concerns they have raised about the service we deliver
- think about the impact of our strategies and policies on the people they will affect and take all reasonable steps to involve them in the development and consultation process

We have set out how we will deliver our services in our access strategy. We also provide easy read guides and information about accessible formats on our website.¹⁵

Our recruitment and selection procedure

¹⁵ www.ipcc.gov.uk/page/people-who-use-our-services

is designed to recruit the best person for the job, aiming for selection free from bias and access to opportunities based purely on merit. We will seek to continue to attract, develop and retain people with diverse experiences and backgrounds. Employees are expected to treat each other with dignity and respect and we work to create an environment where inappropriate behaviour is not tolerated. We are committed to training our staff to make sure that they are fully aware of relevant policies and why they are important to the work of the IPCC. The corporate induction and dignity at work training are mandatory for all staff. In addition, all investigators and casework managers must attend bespoke training on the Equality Act 2010.

We provide a range of support, including an employee assistance programme, which is a confidential information and counselling service provided to employees either by post, phone, or face-to-face. We also have a Staff Council, where staff representatives meet with the executive and senior management to discuss issues affecting the organisation and its staff.

Objective 1 in our Business Plan for 2015/16 includes work in pursuit of equality for complainants or potential complainants; objective six in our Business Plan includes work to promote equality and diversity internally.

3.6 Our work in Wales

The IPCC's remit covers both England and Wales and we have a dedicated Commissioner for Wales.

We meet regularly with the Welsh Police and Crime Commissioners, individually and as a group, Welsh police forces, and the National Police Chiefs' Council (NPCC) in Wales.

We liaise with the Welsh Assembly as well as the Secretary of State for Wales and the Welsh Local Government Association (WLGA) to inform them about our role and responsibilities, to share local issues or concerns and to feed into Welsh legislation.

We also work with other regulatory and inspection bodies such as the Children's Commissioner for Wales, the Public Sector Ombudsman for Wales, the Older People's Commissioner for Wales, the Wales Audit Office and the Equality and Human Rights Commission. We discuss relevant issues with them which allow the IPCC in Wales to call on the services of these organisations should they be required in investigations.

We are committed to complying with our duties under the Welsh Language Act 1993, and the Welsh Language Measure 2011, which place bilingual duties on publicly funded organisations

to treat Welsh and English equally when conducting public business in Wales. We have regular meetings with the Welsh Language Commissioner to make sure that we meet our statutory obligations and there is a new memorandum of interest between the two organisations that sets out arrangements for joint working. New Welsh language standards under the Welsh Language Measure 2011 will place a duty on organisations to make sure that the Welsh language is treated no less favourably than the English language. The IPCC will become subject to these standards in 2015/16.

3.7 Corporate governance

We are committed to ensuring a high standard of corporate governance.

The Commission is responsible for the strategic direction of the organisation and for considering how resources are allocated in order to make sure that we meet our objectives. They then hold the executive to account for the delivery of those objectives.

The Commission is in the process of reviewing its governance structure to make sure that it has the capacity to oversee an expanded organisation. As part of that work, it has created **three committees** to examine specific functions, all chaired by a non-executive commissioner:

Audit and Risk Committee

The Audit and Risk Committee reviews the adequacy and effectiveness of the internal control systems that underpin delivery of our objectives. It oversees and examines our systems and processes for finance, corporate governance, accountability, and complaints against the organisation. The Committee is responsible for approving the annual accounts on behalf of the Commission.

The Committee also advises on the strategic processes for risk, control, quality, governance and the annual governance statement. Significant strategic risks are identified, assessed and managed through mitigation and risk reduction activities. The strategic risk register is reviewed regularly and updated by the Management Board and Commission.

People and Human Resources Committee

This Committee incorporates the previous Remuneration Committee. It meets to agree staff pay and rewards, considers and advises on the Chief Executive's recommendations on pay progression and bonus awards for each director, and advises the Commission Chair in relation to the Chief Executive's pay.

The Committee will have a key role in examining the implementation of our people strategy which is a key part of our Change programme.

Strategy and Impact Committee

The Committee will provide more detailed examination of the work of the Strategy and Impact Directorate. It will consider a range of policies and strategies in their development and implementation stages. This will include our oversight and confidence, stakeholder engagement, communications and knowledge and information management strategies.

This Committee will also examine IPCC positions on significant policy issues, communication and engagement plans, statutory guidance, and consultations.

The Executive ensures appropriate management and control through Management Board meetings and through programme boards, where appropriate. Directors also have their own regular directorate senior management

More information

To find more information about the IPCC's work or to request this plan in an alternative format you can contact us in a number of ways:

You can find out more about the IPCC's work via our website: www.ipcc.gov.uk

You can also follow us on Twitter: @IPCCNews

Find us on Facebook

Email us at: enquiries@ipcc.gsi.gov.uk

Call us on: 0300 020 0096

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