



**IOPC**

Swyddfa Annibynnol  
Ymddygiad yr Heddlu

Independent Office  
for Police Conduct

# > Business plan

---

2021/22

---

## Foreword and introduction

---

Director General's foreword	4
Introduction	7

---

## Our work

---

### Priority: to work with others to improve the police complaints system

Overview	8
What we will do in 2021/22	9
How we will measure our progress	12
Spotlight: improving timeliness and quality	13

### Priority: to improve policing by identifying and sharing learning from our work

Overview	16
What we will do in 2021/22	17
How we will measure our progress	20
Spotlight: tackling discrimination	21

### Priority: to improve confidence in police accountability

Overview	22
What we will do in 2021/22	23
How we will measure our progress	27
Spotlight: building public confidence through improved engagement	28

### Priority: to be an efficient and effective organisation

Overview	30
What we will do in 2021/22	32
How we will measure our progress	34
Spotlight: focusing on equality, diversity and inclusion	35

---

## Funding and risks

---

Our funding	36
Our risks	37

© IOPC 2021

**OGL** This is licensed under the Open Government Licence v3.0  
except where otherwise stated.





POLICE

# Director General's foreword

---

I am pleased to present our Business plan 2021/22. This is the final annual plan supporting delivery of our first Strategic plan, covering the three-year period to March 2022.

In our first three years we set a new direction to improve public confidence in the police complaints system and policing more widely.

I am proud of the progress we have made. Our first priority was to improve the timeliness of our investigations. We are now performing at our highest level ever with 91% of investigations completed in 12 months, beating our target of 85%. This represents a significant improvement given the figure was 69% when the IOPC came into being.

We have also completed all but three of the 538 longer-standing cases we inherited from the Independent Police Complaints Commission. We expect to complete the three outstanding cases by the end of this calendar year.

Through our thematic work, we are focusing on the issues that are of most concern to the public – mental health, abuse of power for sexual purpose, road traffic incidents and discrimination.

We are also looking at stop and search and TASER use.

To date, we have made over 400 learning recommendations to police forces and policing bodies to improve policing practice in a range of areas from stop and search to roads policing and police custody. Prevention is better than cure.

Our third annual Impact report will set out the difference we have made by holding the police to account and improving policing practice by identifying and sharing learning from our work.

Events throughout the year saw increased community concerns about disproportionality, use of force and discrimination by the police, impacting on trust in the police and criminal justice system. Police officers have significant powers that can impact on peoples' liberty and lives; and we know use of these powers has a disproportionate impact on Black, Asian and minority ethnic communities. It is important that the public has confidence that those powers are exercised properly and proportionately and, where they are not, police officers are held accountable.



We have listened to and worked more closely with a range of stakeholders, building better relationships with all those affected by our work.

Stakeholders have noticed the difference. They are more positive than ever and our improved engagement with them is highly praised. This progress builds on our first stakeholder survey in 2019 and supports the change of direction towards learning and engaging more openly.

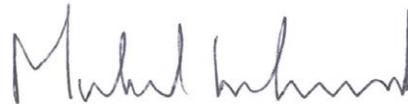
We have worked with the Home Office and others to implement significant reforms to the police complaints system, which took effect in February 2020. These reforms should support our direction of travel and good progress has been made on them.

As we enter this third year of delivery under our current strategic plan, we remain ambitious and will continue to work on issues that matter most to the public and the police.

This year, we will also begin to shape the future direction of the organisation as we consider our next three-year strategy.

I would like to welcome our newly appointed non-executive directors who I look forward to working with, along with our stakeholders, to develop our next Strategic plan.

Finally, as we reflect on the impact of COVID-19, I am immensely grateful to all our staff for their determination and the difference they have made delivering our important work during these very challenging times. Our progress could not have been achieved without them.



**Michael Lockwood**  
Director General



**Our mission is to  
secure and improve  
public confidence in  
policing by ensuring the  
police are accountable  
for their actions and  
lessons are learnt.**

# Introduction

---

This is the final year of delivery against our [Strategic plan 2018-2022](#).<sup>1</sup>

This Business plan sets out the work we aim to deliver in 2021/22.

Alongside delivering our statutory functions, which are outlined in section 10(c) of the *Police Reform Act 2002*, we have planned an ambitious programme of work, underpinned by our four priorities:

- to work with others to improve the police complaints system
- to improve policing by identifying and sharing learning from our work
- to improve confidence in police accountability
- to be an efficient and effective organisation

For each priority, this plan outlines the work we intend to deliver this year to conclude delivery of our three-year strategy. It also sets out how we will measure our progress and how we will know we have succeeded in delivering our strategy.

In committing to this plan we have considered our resources, capacity and capabilities carefully.

We report our progress and performance against the measures in this Business plan to our Unitary Board. The Board, along with our Audit and Risk Assurance and People and Culture Committees, agree our strategy and Business plan and provide challenge and direction to our work.

We will continue to be open and transparent about our performance. We publish monthly performance reports and other information about our work on our website. In addition, we provide ongoing assurance to the Home Office, Home Secretary and Parliament that we are delivering what we said we would and using our resources efficiently and effectively.

Each year we publish our annual report, which provides an account of our performance against our Business plan.

<sup>1</sup> Our Strategic plan 2018-2022 was published in November 2018.

# Priority

## To work with others to improve the police complaints system

---

### Overview

An effective complaints system should consistently deliver impartial, fair and evidence based outcomes in a timely way. It should also ensure that when things go wrong, there is both accountability and learning.

We work with many different stakeholders to drive improvement in all parts of the complaints system. This includes the work we carry out ourselves and the complaint cases that police forces deal with.

We have already made good progress in improving the timeliness of our own investigations. Over 91% of our investigations are now completed within 12 months compared to 69% when we came into being in 2018.<sup>2</sup>

Recent legislative reforms<sup>3</sup> to the police complaints system are also showing early signs of improvement.

However, more is needed from all those involved in delivering the complaints system to ensure that all complaints are dealt with in a reasonable and proportionate way, that end-to-end timeliness is improved, and that there is greater transparency about the processes and outcomes that follow investigations.

We will continue to improve the quality of our work, ensuring evidence-based and transparent decisions lead to well-reasoned conclusions, building on our own internal assurance and review functions. Wherever possible, we will be transparent about the evidence that has

informed our decisions and provide a clear rationale for them. Our work to re-design our operational processes will continue, focusing on making them more efficient and proportionate, and ensuring that they meet the needs of service users.

The IOPC is a part of a wider system, and processes that follow our investigations can add to the time taken to bring cases to a close. It is important that we make sure that the whole system works effectively. Alongside our internal process improvement, we will work closely with partners across the criminal justice system to improve the timeliness of criminal and misconduct proceedings, inquests and the time taken to organise hearings.

<sup>2</sup> This excludes major investigations. Major investigations are large-scale, complex investigations that would ordinarily take significant capacity from within our regional operations team. These are managed by our Directorate of Major Investigations.

<sup>3</sup> The most recent legislative reforms to the police complaints system came into effect in February 2020.

# We will know we have succeeded when

- The time taken to respond to complaints and complete investigations and reviews is reduced across the police complaints system.
- The time taken to complete all related processes (for example disciplinary processes) is reduced, particularly following deaths and serious injuries.
- Complaints are resolved first time leading to fewer reviews.
- Complaints and serious incidents are handled consistently across all forces.
- Those involved in complaints, investigations, appeals and reviews (service users) are satisfied with how their case was handled.

## What we will do in 2021/22

- Review an expected 4,500 cases referred to us each year by police forces and decide how they should be investigated.
- Independently investigate the most serious misconduct and corruption cases involving the police. These ‘core work’ cases involve potential breaches of Articles 2 and 3 of the European Convention on Human Rights.<sup>4</sup> They involve incidents that have a significant impact on public confidence in policing.
- Continue our investigation into the aftermath of the Hillsborough tragedy and other major investigations of national significance. This includes publishing our final report into Operation Linden, our investigation into allegations the police failed to investigate historic complaints of child sexual abuse in Rotherham.
- Identify cases for investigation focused on themes and issues of most concern to the public and police, including discrimination, mental health, road traffic incidents, domestic abuse and abuse of position for sexual purpose.
- Carry out directed investigations into complex cases and those requiring specialist resources. Directed investigations take place under our direction and control, but use police force resources to conduct and complete the investigation.
- Determine over 2,500 anticipated requests for review from members of the public dissatisfied with the way the police handled their complaint.<sup>5</sup> We consider whether the outcome of the complaint determined by the police was reasonable and proportionate.
- Review a further 1,500 cases involving a death or serious injury following police contact to ensure they were handled appropriately by the police and that the right action was taken.
- Respond to over 28,000 requests for information, advice and guidance received each year by our Customer Contact Centre.
- Further develop the expertise of our Operational Practitioner Groups (OPGs), which support all operational staff by sharing best practice in the delivery of our work. We have established OPGs to focus on areas such as disclosure, interviewing, report writing and digital investigations.
- Continue to improve our Operations Manual<sup>6</sup> to provide more accessible, relevant and up-to-date guidance to support our staff in carrying out their work.
- Implement improved operational processes to deliver high-quality and timely outcomes for our service users by:
  - implementing a new Digital Evidence Management System (DEMS) to make best use of the increasing quantity of digital evidence relevant to our work
  - developing a new Case Management System (CMS) so information about our cases is easy to use and access, and is stored appropriately

<sup>4</sup> Article 2 of the European Convention on Human Rights states that everyone’s right to life shall be protected by law. Article 3 of the European Convention on Human Rights prohibits torture, and “inhuman or degrading treatment or punishment”. There are no exceptions or limitations on this right.

<sup>5</sup> Under the reforms introduced in 2020 by the *Policing and Crime Act 2017* a system of reviews was introduced, replacing the previous system of appeals.

<sup>6</sup> Our Operations Manual contains the guidance, templates and documents that staff need in order to carry out our operational work.

- 
- Use our new legal powers to present findings from our cases at disciplinary hearings where this is in the public interest.<sup>7</sup>
  - Use of our power of initiative, where appropriate, to decide how a case should be investigated without the need for the police to first record or refer it to us.
  - Develop more effective ways of working across the wider police complaints system by working with the Crown Prosecution Service (CPS), the Police Federation, the Chief Coroner and other stakeholders.
  - Assess and ensure the quality of our work through our quality assurance framework, including by:
    - holding multi-disciplinary critical case panels<sup>8</sup> to oversee the delivery of our most sensitive and complex investigations
    - carrying out one-off, in-depth reviews of cases focusing on areas of concern, including where there are particular legal risks or issues
    - applying minimum quality standards to all our investigations to help identify and take swift action in response to any at risk of falling below these standards
    - continuing to develop clear and transparent processes, data and arenas to provide assurance of the quality of our operational work
    - running regular internal decision-maker forums and a peer review process to drive consistency and identify learning and areas for improvement
  - Continue to meet our legal obligations under the *Data Protection Act 2018* and the *Freedom of Information Act 2000*.
  - Provide complainants and those acting on their behalf with the right to request a review if we decide not to refer an investigation to the CPS through our Victims' Right to Review (VRR) scheme.<sup>9</sup>
  - Continue to support police forces and Police and Crime Commissioners (PCCs) to embed legislative reforms to the police complaints system aimed at establishing a culture of learning and improvement.
  - Work with the Home Office to update the oversight arrangements for the non-police bodies under our jurisdiction.
  - Focus on improving the quality and usability of our data through delivery of our information management strategy. As a part of this we will make further improvements to our processes for disclosure to support legal proceedings, such as criminal trials and disciplinary hearings.

<sup>7</sup> Regulation 24(1) of the Police (Conduct) Regulations 2020 created new powers for the IOPC to present cases referred to a misconduct or accelerated misconduct hearing where, in respect to an investigation, the appropriate authority (AA) refused to accept a recommendation by the IOPC, the AA's view differed from a determination by the IOPC, the AA and the IOPC agree the IOPC should present the case, or the IOPC considers there is compelling public interest for the IOPC to present the case.

<sup>8</sup> Our critical case panels are multi-disciplinary groups that meet each month to ensure that our most sensitive and complex investigations are handled appropriately.

<sup>9</sup> Our Victims' Right to Review (VRR) scheme ensures there is no disparity between the rights of a victim who alleges that a crime was committed by a member of the public and one who alleges that a crime was committed by someone serving with the police.

---

## How we will measure our progress

### We will aim to:

- complete 85% of investigations within 12 months (excluding major investigations)
- complete 66% of investigations within nine months (excluding major investigations)
- complete 35% of investigations within six months (excluding major investigations)
- decide on the mode of investigation for 80% of cases referred to us within three working days
- ensure the average time taken to complete a review is 50 working days from receipt of background papers
- ensure the average time taken to review a locally investigated death or serious injury investigation is 30 working days from receipt of background papers

### We will monitor and respond to:

- the proportion of reviews we uphold when members of the public are unhappy with how police forces handled their complaint<sup>10</sup>
- the proportion of policing stakeholders who believe the IOPC has an impact on improving the way the police deal with complaints

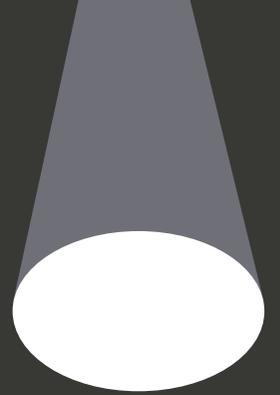
<sup>10</sup> Under the legislative reforms introduced in February 2020, we assess whether the handling or final outcome of a complaint was reasonable and proportionate.



# Spotlight:

## improving timeliness and quality

---



Having skilled people, the right processes and the right tools is critical to delivering improvements in timeliness and quality for our key operational processes.

While we have made significant improvements to the quality and timeliness of our investigations over the past three years since becoming the IOPC, we are not complacent. We remain focused on delivering further improvement.

In 2021/22 we will continue the re-design of our operational processes so these are more proportionate and efficient while maintaining a high-quality service for our service users.

This is being delivered through a series of projects and smaller continuous improvement initiatives over the next two years. The work in 2021/22 includes:

- development of our new DEMS to ensure we have the technological capability to collect, store and manage digital evidence relating to our cases, which is becoming increasingly

prevalent. This work will include embedding the processes, people and tools needed to make best use of this new system and ensure high-quality investigation outcomes where a case involves digital evidence

- improving the way cases are prepared and allocated to provide a more efficient service, ensuring work is allocated to colleagues who are able to provide the most timely, high-quality outcomes at a given time
- improving how we support and resource the work we carry out at the end of an investigation to ensure more efficient use of our resources where they are needed beyond our investigation
- revising our disclosure processes to ensure that we meet our responsibilities in providing support to criminal, misconduct and coronial proceedings and make the best use of our resources

- using a range of different ways to communicate the findings of our major investigations, focused on the needs of individual service users
- developing a decision-making framework for our operational work, creating a standardised set of criteria that we can show to service users to allow us to better illustrate how decisions have been reached
- developing guidelines to help investigators determine the most proportionate way to obtain witness and subject evidence, including by electronic and remote means, and building on some of the new ways of working we trialled during the COVID-19 pandemic

We will also complete a review of our Anti-Corruption Unit looking at the volume of cases, resources, recruitment process and decision making.



# Priority

## To improve policing by identifying and sharing learning from our work

---

### Overview

Changes made as a result of learning from our work can improve policing for everyone and protect the public from harm. While there must be accountability for poor conduct and breaches of professional standards, learning and improving policing is an increasingly important part of our work.

Complaints and serious incidents, such as deaths in custody, present opportunities to learn from what went wrong. We want the findings of our work to support a culture of learning and continuous improvement in policing, which prevents problems happening in the first place and helps drive systemic and organisational change.

Our work continues to focus on the areas of policing that most concern the public and police, with race discrimination, mental health, road traffic incidents, domestic abuse and abuse of position for sexual purpose as key priorities in addition to our core work.

This is supported by legislative changes introduced last year, which focus on improving individual learning and behaviours in response to lower-level conduct matters.

Last year we made 105 learning recommendations which changed policing practice in areas ranging from search warrants to police pursuits.

We share recommendations directly with forces, as well as publicising them through the media, on our website, in our reports or our Learning the Lessons magazine, and via various other channels.

Our annual Impact report includes many examples of how we use the learning from our work to influence changes in policing, ensure accountability and support best practice.

# We will know we have succeeded when

- We routinely work closely with a range of stakeholders both within and outside policing to identify themes and learning from our work.
- Our learning recommendations are accepted, and we can demonstrate their impact on operational policing.
- Stakeholders are confident that our work promotes learning and improvement.
- We can demonstrate that our work has supported our partners (for example Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS), the College of Policing, and the National Police Chiefs' Council (NPCC) by influencing their work to improve operational policing.

## What we will do in 2021/22

- Publish and expand the reach of our Learning the Lessons magazines, sharing learning from investigations carried out both by us and by force professional standards departments (PSDs).
- Produce our annual Impact report to demonstrate the difference we have made in improving policing practice by identifying and sharing learning from our work.
- Continue to focus our work on race discrimination and respond to issues disproportionately affecting Black, Asian and minority ethnic communities by:
  - identifying themes from the cases we have investigated involving race discrimination and working with stakeholders to develop learning recommendations to improve policing practice
  - working with police forces and local policing bodies to improve how they are handling complaints and reviews involving concerns of race discrimination or disproportionality on the grounds of race
    - reporting on the themes we have identified and the action taken in response, including any learning recommendations or improvements to our processes
- Continue work to embed our learning strategy by continually improving the way we produce learning recommendations and use these to drive changes to policing practice.
- Establish effective partnerships with relevant stakeholders, creating opportunities to share expertise across the criminal justice system, including:
  - sharing evidence and learning with HMICFRS to inform its inspection programme
  - contributing to improving the College of Policing's Authorised Professional Practice through regular collaboration about our learning recommendations
  - developing new ways to share real-time learning from our work enabling changes to practice to be made quickly and reducing the risk of harm
- Publish annual statistics on deaths during or following police contact to highlight lessons learnt and describe where improvements can be made to protect the public and the police.
- Continue to work with HMICFRS and the College of Policing to respond to super complaints<sup>11</sup> about systemic issues in policing which may be significantly harming public confidence.
- Continue to build the technical expertise of our subject matter networks (SMNs) to improve the quality and consistency of our work. Our SMNs work with external experts to ensure our work is informed by the latest thinking, practice and guidance.
- Use learning identified through our work to advocate for improvements to operational policing by responding to public consultations and publishing policy positions.
- Contribute to the NPCC's Learning Leaders group to identify opportunities to use learning from our work to make system-wide improvements.

<sup>11</sup> The super complaint system (Section 29A, *Police Reform Act 2002*) provides an avenue for designated bodies to raise a concern about a systemic issue in policing which is, or appears to be, harming public confidence, and is evident in one or more police forces. Super complaints are submitted to HMICFRS, which has lead responsibility for managing the system. HMICFRS works in partnership with the College of Policing and the IOPC (and others as required) to agree a response to the super complaint.



## How we will measure our progress

### We will aim to:

- publish our annual Impact report providing evidence of the difference we have made in improving policing and the police complaints system
- increase to 95% the proportion of stakeholders who agree that our Learning the Lessons magazine is a helpful tool to drive change in police policy<sup>12</sup>

### We will monitor and respond to:

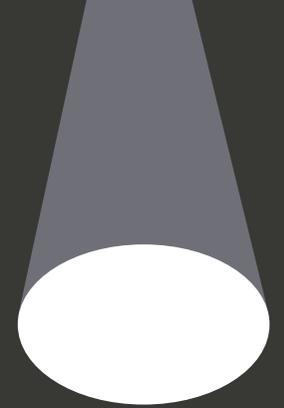
- the proportion of learning recommendations accepted by police forces
- the proportion of stakeholders who think the IOPC is effective in raising standards in police forces
- the proportion of stakeholders who think the IOPC is effective at ensuring police forces learn from complaints

<sup>12</sup> Based on a survey of readers carried out after publication of each new issue of the magazine.

# Spotlight:

## tackling discrimination

---



Evidence of disproportionality in the use of police powers has long been a concern that impacts on confidence in policing, particularly in Black communities. But even with the numbers and the statistics, particularly from stop and search data, we still need to better understand the causes and what can and should be done to address this.

This area of concern was heightened further by the death of George Floyd, the Black Lives Matter movement and increased representations to us from members of a range of Black, Asian and minority ethnic communities expressing concern about discrimination and use of force.

Last year we launched race discrimination as a thematic area of focus to identify the trends and patterns that might help drive real change in policing practice.

Thematic case selection involves independently investigating more cases where racial discrimination may be a factor. This enables us to develop a body of evidence, identifying systemic issues that should be addressed and good practice that can be shared.

Identifying and sharing learning by analysing cases collectively and thematically can lead to changes in culture, training, supervision, policy, and guidance on a much bigger scale than punitive action. In turn this can help address community concerns and improve public confidence in the complaints system and policing as a whole.

Supported by a multi-disciplinary team and an SMN, our analysis will allow us to share an initial report on emerging themes and issues, with a more detailed report and recommendations to follow.

This thematic work will focus on two key areas:

- disproportionality in the use of police powers (for example, stop and search, use of force, use of COVID-19 powers)
- cases where victims of crime from Black, Asian or minority ethnic communities have felt unfairly treated by the police (for example failure to investigate hate crime, missing persons, domestic or sexual abuse; poor treatment of victims or witnesses or failure to provide appropriate care, including where mental health is a factor)

We will make national learning recommendations where we identify opportunities for learning based on the thematic analysis of our cases.

# Priority

## To improve confidence in police accountability

---

### Overview

A strong and robust complaints system that is trusted by the public and the police is a vital part of maintaining confidence in policing.

One of our key duties is to oversee and improve the handling of complaints by police forces.

Many complaints concern lower-level customer-service issues and are dealt with by police forces themselves, but we can independently investigate the most serious cases.

It remains a priority for us to focus on building greater awareness and understanding of our role so the public knows who we are and what we do.

We will do this by working with our stakeholders and key audiences to better understand the communities we serve and how to respond to their concerns, using insights from our research to guide and inform our work.

A key element of this will be better understanding the drivers of public confidence in policing, and which of those we can have an impact on.

In particular, improving awareness of the IOPC among young people and those from Black, Asian or minority ethnic communities will remain a priority. We know there is more work to do in this area, working with our Youth Panel<sup>13</sup> and by focusing on discrimination as a theme.

While those who use our services may have different perspectives and competing needs, our service standards apply to all equally. These standards have contributed to our Customer Service Excellence® accreditation and reflect our ongoing commitment to meeting the needs of all our service users.

<sup>13</sup> In 2018 we commissioned Leaders Unlocked to create our Youth Panel to engage with young people. It currently comprises of 37 young people aged 16-25, 61% of whom are Black, Asian or minority ethnic.

# We will know we have succeeded when

- The public has confidence in the police complaints system and people are willing to complain.
- Young people and those from Black, Asian or minority ethnic backgrounds have confidence in the system and are willing to complain.
- The demographics of those who make complaints reflect the communities served by the police.

## What we will do in 2021/22

- Fulfil our responsibility for overseeing the effective operation of the police complaints system by:
  - collecting, analysing and publishing data on complaints from all police forces to inform our oversight of the system, including publishing annual police complaints statistics for all police forces in England and Wales
  - providing a dedicated point of contact for all police forces and PCCs to discuss complaints handling and review performance
  - producing additional guidance and sharing good practice with force PSDs and PCCs to support improvements in handling complaints
- Increase the confidence of local communities by implementing bespoke community engagement plans across England and Wales.
- Continue to work with our External Stakeholder Reference Group and Wales Stakeholder Forum to inform and challenge our work.<sup>14</sup>
- Work with policing stakeholders to improve co-operation during investigations.
- Work to improve the confidence of Black, Asian and minority ethnic individuals and communities in the police complaints system by focusing on:
  - ensuring effective and meaningful communication and engagement with Black, Asian and minority ethnic communities to help us understand and remove any barriers to them accessing the police complaints system
  - building our understanding of the areas of greatest concern to Black, Asian and minority ethnic communities and focusing our work on those areas
- improving awareness of the outcomes and impact of our work to help build trust and confidence within Black, Asian and minority ethnic communities
- Work with our Youth Panel to improve the awareness and confidence of young people in the police complaints system. This year the Panel will focus on:
  - identifying policing practices that disproportionately affect young people from Black, Asian and minority ethnic backgrounds
  - engaging with young people in education settings and community groups across England and Wales to promote awareness of the right to complain
  - contributing to the joint Metropolitan Police Service and Mayor’s Office for Policing and Crime Use of Force working group to ensure that the views of young people play a part in conversations about policing

<sup>14</sup> The IOPC External Stakeholder Reference Group and Wales Stakeholder Forum bring together a range of external statutory and non-statutory stakeholders to challenge and provide constructive feedback on the IOPC’s performance and key projects, and act as an informal sounding board to discuss specific pieces of IOPC work and relevant topic areas.

- 
- Retain our Customer Service Excellence® accreditation and explore ways to further demonstrate our commitment to the quality of the service we provide.<sup>15</sup>
  - Review and update our complaints and feedback policy, ensuring service users can provide feedback, make suggestions or complain about our work and receive an appropriate response.
  - Investigate complaints about our service and respond to them within 20 working days. Where this is not possible, we will explain why and set out how long we think it will take.
  - Share information about our work with the public by making information available through our website, campaigns, social media, newsletter and media, including publishing case summaries, investigation outcomes, performance data and learning.
  - Continue to implement the recommendations identified by the Institute of Mental Health<sup>16</sup> to promote access to and experience of using the complaints systems for service users with mental health conditions.
  - Introduce restorative practice into our investigations and reviews work where appropriate. So far, we have trained 30 colleagues in restorative practice and these colleagues can now train and support others to use restorative practice. This approach can help to resolve specific cases as well as supporting our engagement with service users more generally.<sup>17</sup>
  - Continue to consult on and develop our proposal for an independent information and advocacy service for the police complaints system to improve support and advice for those who may find it difficult to access and navigate the system.
  - Continue to develop proposals for ways in which service users may challenge our decisions, building on changes already introduced, such as our Victims' Right of Review. We have [updated our website](#) to set out the mechanisms available for people to challenge our case decisions.
  - Deliver a new communications strategy to better engage with key audiences (particularly young people and those from Black, Asian and minority ethnic backgrounds) by:
    - launching new information and awareness campaigns, particularly about our thematic priority areas
    - launching a regular e-newsletter to inform and engage a wider audience
    - reviewing and improving our website so users can access information about our work and the police complaints system
  - Engage regularly with associations and unions representing police officers and police staff at all levels to better understand the views of their members, where we can improve and where we can collaborate further.

<sup>15</sup> Maintaining this accreditation requires us to continue to demonstrate a focus on the service user across five aspects of our work: customer insight, organisational culture, information and accessibility, delivery and timeliness and quality.

<sup>16</sup> In 2018 we commissioned the Institute of Mental Health to carry out research to explore the confidence that people with mental health concerns have in the police complaints system and their likelihood of, and ability to, engage with it.

<sup>17</sup> Restorative practice brings together service users and IOPC colleagues involved in individual cases so that each can share their perspective on our work and work towards resolution.



## How we will measure our progress

### We will aim to:

- improve performance on the following key measures in our public perceptions tracker:
  - the proportion of young people who are confident that the police deal with complaints fairly
  - the proportion of people from a Black, Asian or minority ethnic background who are aware of us

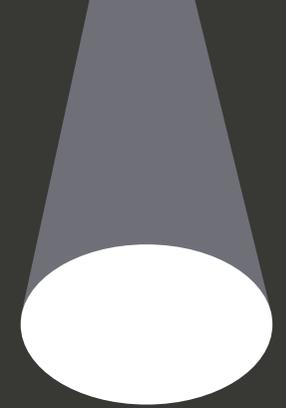
### We will monitor and respond to:

- the proportion of stakeholders who think we are improving public confidence in the police complaints system
- the proportion of police complaints made by people from a Black, Asian or minority ethnic background
- the proportion of police complaints made by young people

# Spotlight:

## building public confidence through improved engagement

---



Improving public confidence in policing through accountability and learning is the IOPC's mission. To achieve this we must engage with and listen to a range of key stakeholders, users of the police complaints system and the general public.

In 2021/22, we will focus on building a better understanding of these groups – who they are, what affects their confidence in the complaints system, and how we can better engage with them and ensure they have access to the right information through channels that best meet their needs.

Our research work will help us gain better insight into what matters most to people, their perceptions and the things we need to continue to improve on.

We have started work on better understanding what drives public confidence and the levers that we control as well as those that other

organisations might influence. This work will inform our second strategic plan and help ensure we focus on the factors that most improve public confidence in policing.

Young people will remain a key area of focus as we launch a new rights and respect digital campaign with our Youth Panel to build awareness and improve young people's confidence in the complaints system. Similarly, we will continue our work to build awareness of both the IOPC and the police complaints system with people from Black, Asian and minority ethnic communities.

What impacts public confidence can differ between communities and we are continuing to tailor our engagement to the needs of specific communities.

Our work can include setting up community reference groups and attending public meetings. This allows us to hear directly from communities

and their representatives about tensions and concerns, and to share updates and answer questions about our work and our progress.

We will continue to improve our public information channels, with a new digital strategy, a new website, an e-newsletter and improved social media. Work will also begin to look at the information we publish, how meaningful this is to those using it, and how we can make it more user-friendly and accessible.

We will continue to engage with our key stakeholders, both national and local, with our annual stakeholder survey forming the benchmark for improvement.

Our External Stakeholder Reference Group, our regional engagement with community-based organisations and key cross-agency meetings will continue to strengthen the way we work with our partners.



# Priority

## To be an efficient and effective organisation

---

### Overview

Our ambition is for the IOPC to be a great place to work. The coronavirus pandemic challenged our traditional ways of working, but we proved to be agile and responsive to changing needs. We ensured that none of our colleagues were left behind and continued to deliver efficiently and effectively.

We have a clear focus on how our people are supported and engaged so they can achieve their full potential working with us. Regular staff surveys during the pandemic showed that our people felt they had clear direction, were supported, productive and well informed.

This year we will build on the innovations and different ways of working we embraced throughout the pandemic, and we will look at new, hybrid models of working as we emerge from lockdown restrictions. The health and safety of our people will remain paramount.

We are committed to giving our people access to the skills, information and opportunities they need to perform at their best, and this year will build on foundations laid with Bridge, our new learning and development system.

We strive to be an efficient organisation where our aspirations match the resources available to us.

Our multi-year ICT transformation programme should conclude this year and has already delivered significant savings, which we have been able to reinvest across the business to ensure we are working efficiently and effectively.

We will continue to assess opportunities to become a more efficient organisation, such as reviewing our estates strategy and further upgrading and enhancing our technological capability so people have access to the right tools to do their job.

# We will know we have succeeded when

- The diversity of our people is improved at all levels and our workforce reflects the communities we serve.
- Our people are motivated, engaged and proud to work for the IOPC.
- We achieve financial efficiency and make savings to reduce our costs, which we benchmark against similar organisations.

## What we will do in 2021/22

- Refresh our investigator accreditation programme, working with the College of Policing to align some of our core investigation standards with the Professionalising Investigations Programme (PIP)<sup>18</sup>, a nationally recognised standard of best practice for investigations.
- Develop a new organisational strategy from April 2022 which is responsive to staff and stakeholder needs.
- Develop and implement future ways of working that transition us to more flexible working practices. This will involve:
  - reviewing changes made to support remote working and social distancing during COVID-19 and decide which changes will continue to offer benefits and should be implemented permanently
  - building on our existing welfare support mechanisms and revising our people and health and safety policies
  - making sure we capture learning from adapting our ways of working over the past year to ensure we understand how we could improve in the future
  - revising our estates strategy to reflect the opportunities that increased home working has highlighted for making the best use of our estate

<sup>18</sup> Our accreditation is licenced to standards of the College of Policing's Professionalising Investigations Programme Parts 1 and 2.

- Implement a new equality, diversity and inclusion (EDI) strategy to maximise opportunities to create a culture of EDI in everything we do. This will include:
  - developing the diversity and inclusivity of our leadership
  - encouraging a more diverse range of applicants to our vacancies and increasing the diversity of our workforce
  - embedding a zero-tolerance approach to race discrimination both in our organisation and across the wider police complaints system
- Offer a range of professional and technical development opportunities for our managers and leaders, and those who aspire to move into those roles. This will include optional Chartered Management Institute qualifications to provide formal recognition of skills.
- Undertake our annual staff survey and regular pulse surveys to understand how we can improve as an employer.
- Conclude our work disaggregating our ICT services from a single, prime supplier. This will improve the stability and flexibility of our ICT platform and allow us to purchase future ICT requirements in a more cost-effective way.
- Continue to explore opportunities for ensuring we offer value for money and make the best use of our finite resource by:
  - refreshing our strategic efficiency and investment plan for future years to ensure we can respond to any changes to our funding while continuing to invest in and develop the service we provide
  - further improving our financial forecasting by better integrating financial planning across more areas of our work
- Review our contracts and procurement processes to ensure they remain fair and transparent, continue to meet our needs, and secure value for money.

## How we will measure our progress

### We will aim to:

- achieve a staff engagement score<sup>19</sup> of 63% (as measured by our annual staff survey)
- ensure that 80% of our investigators achieve accreditation within 24 months
- maintain staff turnover between 8% and 10%
- not exceed 2.9% staff sickness absence

### We will monitor and respond to:

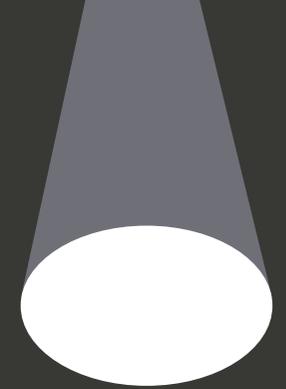
- the proportion of our people, including managers and leaders, from a Black, Asian and minority ethnic background
- the proportion of applicants from a Black, Asian and minority ethnic background who are shortlisted for interview

<sup>19</sup> Employee engagement is a combined measure of thoughts, expectations and organisational culture. Five questions are used to produce an engagement score for our people. These capture engagement by asking how they talk about their organisation, whether they have an emotional attachment to it and whether their organisation inspires them. Higher employee engagement is linked to higher organisational performance, lower sickness and higher levels of happiness.

# Spotlight:

## focusing on equality, diversity and inclusion

---



We live in multicultural communities, filled with diverse people, varied viewpoints and wide-ranging skillsets. We believe in order to provide the quality service that our users expect, our workforce needs to reflect the communities we live and work in across England and Wales.

A more diverse and inclusive workforce helps us better engage with those we serve to gain their trust, better understand their needs, recognise cultural differences and build confidence.

We have taken great steps to improve, introducing new, more inclusive methods of recruiting, increasing our support for groups under-represented at management level to access development programmes, and launching operational-wide training for staff on recognising discrimination within our investigations.

However, we know we have more to do to create a truly diverse workforce and to represent the modern Britain that we work in.

This year we will launch a new equality, diversity and inclusion strategy, which underpins our work and reflects our commitment to meet the needs of the diverse communities we serve.

We will publish more meaningful data on our workforce diversity to better inform decisions and build our capability as a culturally competent organisation through further learning and development.

Our commitment to the Race at Work Charter will remain a recognisable benchmark of our commitment to racial equality, alongside our Stonewall and Disability Confident hallmarks.<sup>20</sup>

We will continue to develop more inclusive leadership by encouraging applications for

our Aspiring Manager Programme from a diverse range of colleagues, actively promoting leadership vacancies on diverse platforms and encouraging applications from under-represented candidates.

We will continue our reverse mentoring programme where our Youth Panel members work with senior leaders to raise awareness and understanding of the experiences of young people.

Our allyship programme will continue to improve colleagues' ability to support a culture where racial barriers are removed and everyone has the opportunities that others may take for granted. Over time we will include other protected characteristics as part of this programme.

<sup>20</sup> The Race at Work Charter is an accreditation provided by Business in the Community and is recognised as a standard of commitment to racial equality. The Stonewall standard is an accreditation provided by Stonewall and is recognised as a standard of commitment to LGBT+ equality. The Disability Confident standard is an accreditation provided by the Civil Service and is recognized as a standard of commitment to equality for disabled people.

# Our funding

We are funded by the Home Office through grant in aid. We receive additional funding from the Home Office to conclude our independent investigation into the aftermath of the Hillsborough tragedy.

In 2021/22, the IOPC will receive revenue funding of £69.645 (£69.645m for 2020/21), which includes funding for the Hillsborough investigation.

Budgets are delegated to directors and are assigned to deliver the projects and other work set out in this Business plan.

## IOPC funding 2021/22

<b>IOPC 2021/22 budget</b>	<b>£m</b>
Private Office Group	1.18
Operations	27.74
Legal	3.83
Strategy and Impact	9.90
Corporate Services	6.50
ICT	9.38
Estates	5.36
Hillsborough	5.87
Income	<b>(0.37)</b>
<b>GRAND TOTAL</b>	<b>69.65</b>

# Our risks

---

To manage the risks associated with delivering the work set out in this Business plan we will continue to use our risk management framework. Our Audit and Risk Assurance Committee oversees the framework and supports us to identify, assess and manage emerging and changing risks. The framework includes our Risk Management Policy, which we update regularly to reflect changes in how we carry out our work. Our Risk Appetite Statement allows us to consider which activities we will undertake and the levels of risk we are prepared to accept to drive this activity forward. The key risks to our delivery this year are noted below.

## COVID-19

Over the coming year we hope to move out of business continuity into a “new normal”. We do not yet know how disruptive this will be or what impact this transition will have on delivery of the work set out in this Business plan. We will re-visit our operational and wellbeing policies to minimise any disruption on our staff and service users.

A degree of uncertainty also remains about continued restrictions on movement and social distancing measures, both of which impact on our ability to engage with all our stakeholders. With the rollout of the vaccination programme we anticipate we will start to have some face-to-face communication, but we will plan for a gradual transition to minimise the impact of any changes.

We will continually review our transition plan and organisational priorities to respond to the ever-changing situation, ensuring we focus our efforts on delivering the most important and impactful work. This will help to mitigate any risk of a potential return of restrictions as the year progresses.

We will complete our essential ICT system upgrade programme and re-design our operational processes. Technology and our approach to innovation and improvement will enable us to develop solutions to overcome barriers we may encounter in delivering our work during these challenging times and in the future.

We are aware that there are delays in the wider criminal justice system as a result of COVID-19. There is a risk that these delays may impact on our own timeliness. While the delays themselves are beyond our control, we will endeavour to keep our service users and stakeholders updated when this occurs.

## Delivering while improving

During the year we will redesign our operational processes. The potential benefit of this work in further improving the timeliness and quality of our work, improving efficiency and improving confidence in the police complaints system, is great.

As we begin to implement this work, we will gain greater clarity over the ways in which our processes will change and will be better able to anticipate the impact that delivering this work will have on other aspects of this Business plan. We will continue to assess our priorities and use our change control framework to ensure that we continue to deliver our statutory functions while progressing the aims of this work.

## Resourcing

Uncertainty about our funding in future years remains a risk to our delivery. We will keep our strategic efficiency and investment plan under review to help us better understand and respond to potential changes to our funding.

We are expecting the postponed comprehensive spending review to occur in the new financial year. We will respond to any comprehensive spending review proposals to demonstrate what impact a change in funding will have on the work we are delivering.

We are also expecting ICT disaggregation to generate significant savings. However, this work involves complex and prolonged contractual negotiations, which make it difficult to specify the full extent of the savings to be realised at this stage.

We will continue to implement this plan over the coming 12 months, revising proposals where necessary. This will allow us to make informed decisions about competing priorities and maximise opportunities for efficiency where possible.

## Information management

Following the UK's departure from the European Union we are monitoring our obligations under the General Data Protection Regulation in line with our information strategy and Government guidance.

We have seen increasing demand for requests for information in the last year and do not expect this demand to diminish. We are recruiting more staff and rolling out further training to manage and mitigate risk to ensure compliance with the *Freedom of Information Act 2000*.

## More information

---

To find out more about our work or to request this plan in an alternative format, you can contact us in a number of ways:

 [www.policeconduct.gov.uk](http://www.policeconduct.gov.uk)

 Follow us on Twitter: [@policeconduct](https://twitter.com/policeconduct)

 Email us at: [enquiries@policeconduct.gov.uk](mailto:enquiries@policeconduct.gov.uk)

 Call us on: **0300 020 0096**

Text relay: **18001 0207 166 3000**

Write to us at:

IOPC  
10 South Colonnade  
Canary Wharf  
London E14 4PU

We welcome telephone calls in Welsh.  
Rydym yn croesawu galwadau ffôn yn y Gymraeg.

This document is also available in Welsh.  
Mae'r ddogfen hon ar gael yn y Gymraeg hefyd.