

Oversight and confidence strategy

2014/15 – 2016/17 and 2014/15 action plan

Foreword



In 2014/15, the IPCC will begin to take on more independent investigations into serious and sensitive allegations made against the police. That is an important part of our statutory responsibility to ensure public confidence in the police complaints system. But it is not enough, by itself, to achieve that aim.

Even with an expanded IPCC, the great majority of the 30,000 or so complaints made annually will continue to be dealt with by local police forces. Some will have no IPCC involvement; in others, when complainants appeal to us, we are finding that nearly half have not been properly handled at local level. That underlines the need for us to have more effective oversight of the complaints system as a whole. For that reason we have been piloting ways of examining local complaints handling and assisting local forces to improve the way they respond when people complain. That has already led to findings that are influencing complaints handling locally, and to more focused IPCC guidance for those doing so.

It is equally important that the public has confidence that the findings of complaints and investigations feed into better policing practice: that our recommendations are implemented and learning is embedded in forces and in the training and standards for policing. That requires partnership between us and other policing bodies: the College of Policing, the Inspectorate of Constabulary, and Police and Crime Commissioners, all of whom also have responsibilities for oversight and accountability. Our work must complement, not duplicate, theirs.

This strategy, which is part of our wider corporate and business plans, sets out the way in which we plan to carry out that work. It is an ambitious programme, which is a key part of the strategy and planning for the new IPCC that will emerge over the next two to three years.

A handwritten signature in black ink that reads "Anne Owers". The signature is written in a cursive, flowing style.

Dame Anne Owers
IPCC Chair

1. Introduction

The IPCC has a statutory obligation to secure and maintain public confidence in the police complaints system in England and Wales. It is vitally important that not only the wider public, but especially those who come into contact with the police complaints system, have confidence that through it they will achieve a fair outcome, lessons will be learned, and the police will be held to account. All of the IPCC's day to day work, our investigations and our decisions on appeals about how the police have handled complaints, contributes to meeting this obligation.

We deal directly with only a small proportion of complaints from the public about the police each year – police forces deal with the majority of complaints, locally. We, therefore, also work to oversee the way the police handle complaints and to promote within the police service a culture of learning and improvement, and of responsiveness to complaints and other feedback that the public provides. This strategy sets out what we will do to ensure that all of our work has the greatest possible impact on the public's confidence in the police complaints system.

This document is only part of the IPCC's plans and strategies for the future, as reflected in our corporate and business plans. It should be read alongside those documents and our communications strategy. It also contributes to meeting our obligations under the public sector equality duty and requirements under the Welsh Language Measure.

It replaces our existing *Guardianship* strategy and builds on work that we have already done in this area, which has led to significant achievements in the IPCC's first ten years. For example:

- using evidence from our cases, we emphasised the need for better guidance to make sure police pursuits were handled safely, resulting in improved guidance for the way the whole of the police service deals with pursuits and in this guidance being given the force of law
- we used the evidence of our cases and our in-depth research study of deaths in custody to bring about improvements in how the police handle detainees, through our involvement in the revision of the police service's 'Guidance on Safer Detention and the Handling of Persons in Police Custody' and then in the revision of the Police and Criminal Evidence Act (PACE) codes, which govern the treatment of people detained by the police
- our research into the use of police cells as a 'place of safety' under section 136 of the Mental Health Act 1983 informed the Bradley Review of people with mental health issues and learning disabilities in the criminal justice system. This in turn fed into the Government's delivery plan for health and criminal justice. We advised on the production of guidance on how the police should respond to people with mental health issues, which deals with the use of section 136 and aims to reduce or eliminate the use of police cells as a place of safety
- we developed and have used our position statement on stop and search to encourage and contribute to public debate around the police's use of these powers, which has led to positive changes in police practice

- we have taken an increasingly consultative and listening approach to our work, shown, for example, through our review of investigations following a death

However, we recognise there is more we can do to ensure our work has the greatest possible impact. Moreover, the Police Reform and Social Responsibility Act 2011 changed how the police complaints system operates. The IPCC now directly works on a narrower range of only the more serious cases, where we are upholding an increasing proportion of appeals from complainants dissatisfied with police investigations. We need to do more work with forces to ensure that complaints in general, including complaints we no longer see, are being handled well. We want to develop our ability to listen and to learn from those who have experienced the police complaints system, in order to improve it. The complaints system is over-complex and we need to continue to do our best to guide the public and the police service through it, and to seek opportunities to simplify it.

The Home Secretary has concluded that we should be given more resources in order to have a greater impact, and to raise public confidence by undertaking more investigations independently of the police. This strategy is designed to maximise the benefits of those investigations and our complaints work by capturing and distributing the learning they reveal. This will allow us to work with individuals and bodies such as the College of Policing, Her Majesty's Inspectorate of Constabulary and Police and Crime Commissioners to improve policing and the handling of complaints from the public. In 2013/14 we undertook pilot schemes to test innovative approaches to achieving this.

This is an ambitious strategy designed to bring about real improvements over the next three years. The scale and speed of its delivery is dependent on the additional funding that has been proposed by the Home Secretary. We will use this opportunity to give this area of our work a renewed focus.

2. The challenge

Our most recent public confidence survey (2014) shows that much of the population of England and Wales has heard of the IPCC, and is more confident in using the complaints system. It also shows, however, that there are significant sections of the population, most notably ethnic minority communities and young people, who do not know who we are and who do not trust either the complaints system or the IPCC's independence.

Key events in the recent history of the IPCC have shown that sometimes we have not been able to rise to the demands of our role. We have already changed some of our practices and processes in response, and additional resources will help us to respond better to those who use our services. Diversity, one of our core values, must be central to this work.

Surrounding all of this, the landscape of policing continues to change. New bodies have been created, including Police and Crime Commissioners and the College of Policing, and others, like HM Inspectorate of Constabulary (HMIC), are changing the way they work. The IPCC expects to undergo significant change and expansion

during the life of this strategy, as well as gaining important new powers through the Anti-Social Behaviour, Crime and Policing Act 2014.

The IPCC cannot change policing on its own and we need to work with others, including policing bodies, families and communities. With our partners, inside and outside the policing world, we can ensure our cases and the complaints system as a whole are part of a virtuous circle of learning and improvement for policing in England and Wales.

3. How we developed this strategy

The development of this strategy has drawn upon our experience of oversight and our work to build public confidence in the police complaints system of England and Wales over the last ten years. We have taken into account valuable feedback we have received from complainants, families and their representatives, including contributors to our review of investigations involving a death.

To set the right direction for our work, we consulted publicly on this strategy between January and March 2014. We have benefited from more than 100 responses to this consultation. Some were from individual members of the public, whereas others came from individuals and organisations whose work relates to policing. We are grateful for all of these, and have considered carefully what we have been told.

Some of the points made to us were directly about this strategy and what we should say here. Others were about the work we might do under this strategy; these will either shape work we were already considering or have made us think about new things we could do. Some will inform other areas of the IPCC's work, outside the scope of this strategy.

The consultation has prompted us to make two particularly significant changes to this strategy, and the work we will do to achieve its aims.

Firstly, while we are aware of the barriers to using the complaints system that exist for some parts of the public, particularly for young people and ethnic minority communities, we were struck by the level of concern about this, which was shown in our consultation. We have, therefore, brought forward plans for work to better understand and address these issues.

Secondly, we received many suggestions about involving local people in the complaints system, and about working with Police and Crime Commissioners, to ensure that complaints are handled well and lead to improvements in policing. We think that the time is right to better define how we will work with Police and Crime Commissioners. We will, therefore, explore ways in which we can formalise our working relationship and consider the range of ideas that have been put forward.

4. Our vision

The IPCC is trusted to hold the police to account and there is increased confidence in the complaints system

The complaints system established under the Police Reform Act 2002 is an important part of how the police in England and Wales are held to account. It operates alongside, and in support of, other means of accountability, such as the accountability of chief officers to elected Police and Crime Commissioners.

The IPCC contributes to public accountability in a range of ways. We do this through our investigations of the most serious and sensitive cases, and through our independent scrutiny of appeals. We set and monitor standards for how the police handle complaints, and we share learning to improve both the handling of complaints and police practices more generally.

We will seek to ensure that everyone has equal access to the complaints system and confidence:

- about making a complaint
- that their complaint will be dealt with fairly
- that the police will be held to account when things go wrong
- that lessons will be learned from complaints, and lead to improvements in policing

5. Our aims

I. We will improve how complaints about the police are handled

So that:

- the public can make complaints with confidence, and those who choose to complain are satisfied with how their complaint is handled
- the police can obtain as much learning as possible from complaints in order to improve their service to the public
- by dealing promptly and decisively with complaints, valuable police resources can be freed up for operational policing

II. We will ensure that our work enhances police accountability, and work with other agencies and oversight bodies to improve policing

So that:

- failings and mistakes are appropriately addressed
- lessons are learned
- the police complaints system contributes fully to improving the service that the police provide to the public

III. We will increase public trust in the effectiveness of the complaints system

So that:

- all sections of the public in England and Wales, in particular those who currently have low levels of trust in the system, have confidence in the complaints system, should they need to use it
- the wider public is confident that the police will be held to account when something has gone wrong, and confident in our conclusions when we find that the police did all they should
- the public trusts the IPCC as a robust and independent overseer of the system

6. Our objectives

Aim one: We will improve how complaints about the police are handled

The current position

In early 2013 we issued a renewed version of our guidance to the police service on how complaints should be handled, and how the complaints system as a whole should operate.

As a part of how we monitor forces, we collect and publish both quarterly and annual statistics on how well forces perform in dealing with complaints. This allows us and the police service to understand where the complaints system is working well and where things might need to improve. It helps Police and Crime Commissioners to hold their chief officers to account for complaints the public makes, and for how their force handles complaints. It also helps the public to understand how well their local force is doing in dealing with complaints.

In 2013/14, we tried new ways of monitoring how well forces comply with our guidance and their overall performance in handling complaints, and new ways of helping forces to improve when they fail to meet the standards we expect. We have improved how we manage our relationships with individual forces in order better to understand emerging local trends, and have greater impact when we need to take action.

How we will build on this

Objectives		Impact by April 2015	Impact by April 2017
i.	<p>We will continue to develop how we monitor the way forces apply our guidance about how the complaints system should work, the quality of how forces handle complaints, and how we respond when complaints are not handled to the standards we expect.</p> <p>This will include work to monitor and ensure fair and equitable access to the complaints system for every member of the public.</p>	<p>The police will better understand what we expect them to do.</p> <p>Our interventions will help the police to improve how they handle complaints.</p>	<p>The public's experience of how the police handle low-level complaints will have improved.</p> <p>Complainants will come away from the complaints system more satisfied with how their complaint was handled.</p>
ii.	<p>We will develop additional guidance and other means of assisting the police to handle complaints better.</p>		
iii.	<p>We will further develop our performance framework for the police complaints system, so that it better illustrates how well forces handle complaints.</p>	<p>The public will be able to access information about how their local force handles complaints, and compare this against other forces.</p>	<p>The police will have used this information to improve how they handle complaints.</p> <p>As a result, complainants will receive a better service.</p>
iv.	<p>We will continue to make the case for simplifying the police complaints system, so that it becomes easier for the public to use.</p>	<p>The public, our stakeholders and the Government will be clear about why reform of the complaints system is necessary.</p>	

Aim two: We will ensure that our work enhances police accountability, and work with other agencies and oversight bodies to improve policing

The current position

We are improving the way information is collected, held and used within the IPCC. This will allow us to get the most out of what we learn from our work, and ensure we focus our efforts where we can add the most value.

We have also created a centralised function that will initially handle all the matters forces refer to us, and decide whether and how we will investigate them. Among other benefits, this will allow us more easily to identify and act upon common issues among the serious incidents that are sent to us.

As a part of our new approach to managing our relationships with individual forces, we are now seeking more information about what has been done following our findings and recommendations in individual cases. We have done work to understand how well each force is able to ensure learning spreads throughout its organisation, and where gaps exist. The Anti Social Behaviour, Crime and Policing Act 2014 is giving us more powers, which include requiring forces to respond formally to our learning recommendations.

We produce a 'Learning the Lessons' bulletin three times a year covering a range of topics, driven by the themes we see in our cases. This bulletin is produced jointly with a range of agencies, which collectively contribute to how policing is delivered in England and Wales, and which are able to bring about change on the basis of our findings. We are entering into a formal agreement with HMIC and the College of Policing, to set out how we will work together to improve policing.

How we will build on this

Objectives		Impact by April 2015	Impact by April 2017
i.	We will develop a robust system for following up on our learning recommendations.	Forces will understand what we require from them in response to our recommendations, and expect their response to be routinely published.	The public will see how forces respond to our recommendations, and be confident about how our cases lead to improvements in how forces work.

ii.	We will continue to make the case for reform of the police disciplinary system, with the aim of it becoming more timely, transparent and independent of the police service, so the public can be confident that individual officers and staff will be held to account when things go wrong.	Using evidence from our cases and our perspective on the system we will have influenced the Home Office's work to reform how the police discipline system operates.	A new police discipline system will have been created, which commands public confidence, and in turn increases confidence in the effectiveness of our own cases.
iii.	We will improve our ability to identify emerging trends across the whole range of information we receive (for example from our cases, through our engagement with stakeholders and from public concerns). We will become better able to analyse and respond to these trends.	The public, our stakeholders, Police and Crime Commissioners, and the police themselves will see us identifying more relevant trends, more quickly, as they arise.	The public will know that the IPCC is at the forefront of debate on developments in policing practice.
iv.	We will strengthen our relationships with key partners inside and outside the policing world, who can bring about change to policing on the basis of our findings and recommendations.	<p>We and our partners will be clear about how we will work together.</p> <p>We will have started to work with our partners on the key issues.</p>	<p>The police will routinely adopt improved working practices, informed by learning from our cases and research.</p> <p>The public will experience an improved quality of policing service as a result of our findings and recommendations, and work with our partners.</p>

Aim three: We will increase public trust in the effectiveness of the complaints system

The current position

We carry out a regular *Public confidence survey*, which provides us with information about public perceptions of the IPCC and of the police complaints system more widely. We will continue to use surveys and other mechanisms to provide us with the best possible information to identify where confidence in the IPCC and the complaints system is low, so we can work to address this.

In our review of investigations following a death, we have benefited from the participation of people who have been directly involved in our handling of such cases, and of others who have an interest in this area of our work. We have also worked to build public trust in relation to other themes, such as stop and search, and domestic violence. This provides us with a model for how we can involve the public and our stakeholders in improving how we go about our day to day business. We are now looking across the IPCC at how we listen to stakeholders and the people involved in our cases, and how we can use their perspectives to inform our work. We are also looking at how we can use external expertise to assist with, and ensure, the quality of our work.

We are working to consolidate our knowledge of the criminal and disciplinary outcomes that have arisen from our own cases in order to publish this, as a part of our work to better inform the public about the results of our cases.

We recognise the complexities of the current police complaints system and we have made strong representations that it requires radical reform and simplification. However, we need to ensure that we are open and transparent about the way we work and make decisions, and that we help to guide people through the system.

How we will build on this

Objectives		Impact by April 2015	Impact by April 2017
i.	We will deepen our current understanding of where among the public a lack of trust in the IPCC or the complaints system exists, and the reasons why this is the case. We will build our relationships with these groups.	We will identify, from our <i>Public confidence survey</i> , areas where there is a lack of trust, and take positive action to enhance our engagement with these communities.	Groups that currently trust less in the IPCC and the complaints system will have an increased level of awareness and trust.

ii.	We will be more transparent and open with the public about how we take decisions and do our work.	The public and the police will have more information available to them about how we work, and about the reasons behind our decisions.	The public and the police will better understand how and why we reach our decisions, and so have greater confidence in them.
iii.	We will seek feedback on our work from people that we deal with in our cases, and from across our stakeholders, in order better to understand how we can improve our service delivery and grow public confidence.	<p>The people who are involved in our cases will be more easily able to give us feedback on the service we provided to them.</p> <p>Our stakeholders will feel listened to, and have regular opportunities to contribute to our work.</p> <p>Our staff will have a greater awareness of how the organisation presents itself to the outside world, and how their work impacts on this.</p>	<p>Those involved in our cases will feel that we are responsive to their needs.</p> <p>People involved in our cases will experience an improved service, reflective of their feedback.</p> <p>Our stakeholders will feel it is worthwhile to give us feedback, and that we will listen and respond to their views.</p>

<p>iv.</p>	<p>Learning from our experience, we will become more open across our cases to outside perspectives, and create greater opportunities for those directly involved, and other stakeholders, to inform our work.</p>	<p>We will be better able to engage effectively with complainants and bereaved families to ensure our investigations meet their needs.</p> <p>We will have in place improved means of taking account of the views and experiences of relevant stakeholders such as local communities, experts or representative organisations.</p> <p>Our staff will feel better equipped and supported to carry out our work to a high standard.</p>	<p>The effectiveness of our investigations will increase as we look at problems in new ways.</p> <p>IPCC investigations will be seen to provide broader answers to the issues raised in our cases.</p>
<p>v.</p>	<p>We will work towards reporting on a complete picture of case outcomes for officers and staff members across the whole complaints system, including criminal proceedings, disciplinary proceedings and steps taken to deal with unsatisfactory performance.</p>	<p>The public will have a better understanding of the disciplinary outcomes that result from complaints about the police.</p>	<p>Greater openness will foster consistency in outcomes across forces, and outcomes more appropriate to the conduct considered.</p> <p>The public will be confident that the actions of individuals are addressed effectively when things go wrong.</p>

vi.	We will proactively raise the awareness of our stakeholders and the public about the difference that the IPCC and the complaints system makes.	The public and our stakeholders will be better informed about what is achieved through the complaints system and the IPCC's work.	The public and our stakeholders will see the IPCC as a more effective organisation. The public will see making a complaint as being more worthwhile.
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7. Making this happen

During 2013/14 we piloted a number of initiatives to test new or improved ways of overseeing the police service and seeking to build public confidence in the complaints system. We will build on these pilot projects in further work under this strategy.

2014/15 is a time of significant change for the IPCC, as we expand to deal with the most serious and sensitive allegations made against the police. We are clear, however, that simply carrying out more investigations, while extremely important, is not sufficient to increase public confidence or fully address public concerns. We will work to ensure that an expanded IPCC can conduct effective oversight of the system as a whole and build public confidence, both inside and outside our investigations. The work we intend to do under this strategy in 2014/15 is detailed in the pages that follow. We will publish further plans for work under this strategy annually.

Our 2014/15 oversight and confidence action plan

Objective reference	Objective	Action reference	Action	Timetable
Aim one: We will improve how complaints about the police are handled				
1.i	We will continue to develop how we monitor the way in which forces apply our guidance about how the complaints system should work, the quality of how forces handle complaints, and how we respond when complaints are not handled to the standards we expect.	1	We will assess the impact of the oversight and confidence monitoring pilot projects we undertook with forces during 2013/14.	Quarter 3 to quarter 4
		2	We will publish the results of our 2013/14 oversight and confidence monitoring work with forces, including any learning we have identified.	Quarter 1 to quarter 2
		3	We will conduct a further series of oversight and confidence monitoring projects with forces, and analyse the findings.	Quarter 2 to quarter 4
		4	We will conduct a programme of ongoing force liaison work, while reviewing the role of our Force Liaison Coordinators.	Quarter 1 to quarter 4
	This will include work to monitor and ensure fair and equal access to the complaints system for every member of the public.	5	We will review and reissue our guidance to the police service on handling allegations of discriminatory behaviour.	Quarter 1 to quarter 4
1.ii	We will develop additional guidance and other means of assisting the police to handle complaints better.	6	We will produce four issues of our new publication, <i>Focus</i> , through which we will provide the police with practical guidance on the handling of complaints and other matters within the complaints system.	Quarter 1 to quarter 4

Objective reference	Objective	Action reference	Action	Timetable
1.iii	We will further develop our performance framework for the police complaints system, so that it better illustrates how well forces handle complaints.	7	We will reinstate our performance framework for the police complaints system, through which we report how well each force is doing with handling complaints, and improve it so that it is made more accessible to our stakeholders.	Quarter 1 to quarter 4
		8	We will undertake the second phase of our website development project, through which we will improve how we present the data we collect on forces' handling of complaints and make it easier for the public to compare how well different forces are performing.	Quarter 1 to quarter 2
1.iv	We will continue to make the case for simplifying the police complaints system, so that it becomes easier for the public to use.	9	We will look for opportunities to influence others to simplify the complaints system.	Quarter 1 to quarter 4
Aim two: We will ensure that our work enhances police accountability, and work with other agencies and oversight bodies to improve policing				
2.i	We will develop a robust system for following up on our learning recommendations.	10	We will produce three Learning the Lessons bulletins, which help the police service learn from investigations and other aspects of the police complaints system.	Quarter 1 to quarter 4
		11	We will make ourselves ready to use a new power that we are being given by the Anti-social Behaviour, Crime and Policing Bill to issue organisational learning recommendations under a statutory framework.	Quarter 1 to quarter 3
		12	We will record and report the overall criminal and disciplinary outcomes that result from the cases we investigate.	Quarter 1 to quarter 4

Objective reference	Objective	Action reference	Action	Timetable
2.ii	We will continue to make the case for reform of the police disciplinary system, with the aim of it becoming more timely, transparent and independent of the police service, so the public can be confident that individual officers and staff will be held to account when things go wrong.	13	We will continue to press for legislative change to improve the police disciplinary system, including independent panels.	Quarter 1 to quarter 4
2.iii	We will improve our ability to identify emerging trends	14	We will identify missing information needed to drive forward our <i>Oversight and confidence strategy</i> , and put in place the systems to collect it.	Quarter 1 to quarter 4

Objective reference	Objective	Action reference	Action	Timetable
	across the whole range of information we receive (for example from our cases, through our engagement with stakeholders and from public concerns). We will become better able to analyse and respond to these trends.	15	We will scope changes required to our case management software, Perito, in order for it more fully to support our oversight and confidence work.	Quarter 1 to quarter 4
		16	We will complete and publish our research project on the use of force by the police, and make good quality recommendations that will improve policing.	Quarter 1 to quarter 4
		17	We will develop and begin implementing a rigorous evidence-based process for identifying areas for thematic research and policy activity within the remit of the IPCC.	Quarter 1 to quarter 4
		18	We will identify two to three areas of policy project work to be undertaken in 2014/15-2015/16.	Quarter 1
		19	We will put in place a system to maintain an ongoing watching brief for a range of identified policy areas.	Quarter 1 to quarter 4
2.iv	We will strengthen our relationships with key partners inside and	20	We will establish our concordat with HMIC and the College of Policing, and begin to work in line with our commitments under it.	Quarter 1 to quarter 4

Objective reference	Objective	Action reference	Action	Timetable
	outside the policing world, who can bring about change to policing on the basis of our findings and recommendations.	21	We will explore opportunities to formalise how we work alongside Police and Crime Commissioners in relation to our complementary roles and responsibilities as part of the overall picture of police accountability.	Quarter 3 to quarter 4
Aim three: We will increase public trust in the effectiveness of the complaints system				
3.i	<p>We will deepen our current understanding of where among the public a lack of trust in the IPCC or the complaints system exists, and the reasons why this is the case.</p> <p>We will build our relationships with these groups.</p>	22	We will undertake engagement work to deepen our understanding of the access and awareness issues BME communities, children, and young people experience, as outlined in our engagement strategy.	Quarter 1 to quarter 4
3.ii	We will be more transparent and open with the public about how we take decisions	23	We will implement the recommendations arising from our review of investigations following a death and the external review of our investigation into the death of Sean Rigg, and we will publish a report on the effectiveness of these actions.	Quarter 1 to quarter 4

Objective reference	Objective	Action reference	Action	Timetable
	and do our work.	24	We will publish the criteria that we consider when we make a decision about how a case should be investigated.	Quarter 1 to quarter 2
3.iii	We will seek feedback on our work from people that we deal with in our cases, and from across our stakeholders, in order better to understand how we can improve our service delivery and grow public confidence.	25	We will complete and begin implementing the findings of our review of the IPCC's approach to collecting feedback from the people who use our services.	Quarter 1 to quarter 4
3.iv	Learning from our experience, we will become more open across our cases to outside perspectives, and create greater opportunities for those directly involved and other stakeholders to inform our work.	n/a	See actions 25 and 26.	

Objective reference	Objective	Action reference	Action	Timetable
3.v	We will work towards reporting on a complete picture of case outcomes for officers and staff members across the whole complaints system, including criminal proceedings, disciplinary proceedings and steps taken to deal with unsatisfactory performance.	n/a	See action 12.	
3.vi	We will proactively raise the awareness of our stakeholders and the public about the difference that the IPCC and the complaints system makes.	26	We will implement year one of our <i>Stakeholder engagement strategy</i> .	Quarter 1 to quarter 4
		27	We will collate and publish information on the IPCC's use of powers, and we will continue to press for any changes in our powers needed to increase public confidence in us.	Quarter 1 to quarter 4