

IPCC GUARDIANSHIP STRATEGY FOR THE POLICE COMPLAINTS SYSTEM (May 2011)

Introduction

The IPCC's purpose is to increase public confidence in the police complaints system. We do this by providing direct oversight of individual complaints and conduct issues through our investigations, appeal reviews and other casework activities. We also provide general oversight of the performance of the system as a whole. This general oversight is our guardianship function and covers four elements. These are:

- Setting, improving, reviewing and monitoring standards for the operation of the police complaints system;
- Promoting confidence in the complaints system as a whole amongst the public and police;
- Ensuring the accessibility of the complaints system; and
- Promoting policing excellence by drawing out and feeding back lessons arising from the IPCC's work.

The IPCC has established a performance framework which measures the performance of the police complaints system against five aims: confidence, learning, engagement, proportionality and accountability. The success of the IPCC's guardianship strategy will be reflected through improvements in the complaints system against all these aims.

This strategy sets out how we will effectively discharge our guardianship responsibilities and is divided into three sections:

- Section 1: The IPCC's Guardianship Role – an outline of the core guardianship activities we undertake to deliver the four elements of guardianship.
- Section 2: Priority Issues and Strategic Guardianship Projects – the specific priority issues that Commission has agreed will guide our work and the allocation of resources and the strategic guardianship projects we will deliver.
- Section 3: Delivering Guardianship – an outline of how guardianship activities will be delivered across the IPCC.

Section 1: The IPCC's Guardianship Role

The IPCC carries out a range of activities to deliver the four elements of guardianship. These activities can be described as either core guardianship activities (those that need to be delivered on a regular and ongoing basis) or strategic guardianship projects (specific areas of thematic work which the IPCC has decided to focus on and which are time-limited).

Specific Priority Issues

As part of its strategic planning process the IPCC uses evidence from investigations, casework and guardianship activities to identify specific issues of priority. These are areas where we will focus our attention to ensure we use our resources to address the issues that matter to the public. The aim of our work in these areas is to ensure that police forces learn and improve, such incidents and complaints reduce in number and public confidence improves.

These priorities provide a focus for our work and influence the specific activities under each of the four elements of guardianship. The current priority issues are set out in section 2; they will be reviewed annually to ensure they continue to reflect common themes and the issues that attract the greatest public concern in complaints and investigations.

Core Guardianship Activities

The IPCC is committed to delivering a framework of core guardianship activities. These are broadly outlined below in respect of each of the four elements of guardianship. Annex B provides a detailed list of core guardianship activities and the directorates responsible for this work.

Setting, improving, reviewing and monitoring standards for the operation of the police complaint system

The IPCC will ensure that organisations within our jurisdiction are provided with relevant and current guidance on how to best deal with complaints and conduct issues. To this end we will develop and maintain Statutory Guidance for the organisations within our jurisdiction and will issue operational advice notes where there is a need for further guidance in specific areas.

Our work in monitoring and seeking to improve performance across the complaints system is informed by the intelligence gained from our investigations and casework functions. The IPCC also collects complaints data directly from police forces and uses this to produce annual reports on complaints statistics.

In order to provide more detailed information on police complaints at a local level, the IPCC publishes quarterly Complaints Information Bulletins as part of its performance framework for the complaints system. These reports show force data against a number of indicators and include comparisons to both national trends and 'most similar forces.' The aim of the performance framework is to improve performance and to increase accountability for that performance to stakeholders and the public.

The IPCC will regularly meet with the organisations within our jurisdiction, about their performance in delivering complaint and conduct resolution for the public. We will use these meetings to:

- raise performance issues;
- discuss learning arising from our research, investigations and appeals;
- share good practice;

- resolve any bilateral issues between these organisations, the IPCC and other stakeholders; and
- discuss areas where we can develop our own processes and performance.

We will also attend regional Professional Standards Department and Police Authority meetings to take forward regional or national performance issues and learning.

Meetings and wider contact with forces may vary according to their performance. In some cases we may decide to take a watching brief. In others we may decide to take a pro-active monitoring role.

The IPCC will regularly meet with key partners in the complaints system to discuss and resolve issues which are within their remit or require cross-system working. Our key partners include:

- The Home Office
- Association of Chief Police Officers portfolio leads and Committees
- The Association of Police Authorities
- HM Inspectorate of Constabulary
- The National Policing Improvement Agency
- The Crown Prosecution Service

We will directly involve these partners in discrete projects to improve the performance of the system through membership of governance boards and practitioner groups.

The IPCC will also work with other national policing oversight bodies to develop international cross-working where appropriate, share experience and good practice and develop common principles for police oversight.

Promoting confidence in the complaints system as a whole

IPCC Commissioners are responsible for promoting confidence in the police complaints system. Effective engagement with communities is vital to achieving this goal but represents a significant challenge given that, unlike consumer interest groups, there are no organisation(s) which can speak with authority on behalf of complainants against the police. Given this challenge and our limited resources, we will focus our efforts on those matters which impact most on public confidence in policing, the IPCC and the complaints system. Community engagement activities will therefore focus on and be guided by the priority issues which are agreed annually by the Commission.

Our community engagement activities will aim to:

- Promote our work to representative community and interest groups
- Understand their concerns about how the police engage with them and how confidence could be improved in these areas

- By listening to and acting on their feedback about the police, the work of the IPCC and the wider complaints system, help us understand how services can be improved further to meet public expectations
- Collate, analyse and use feedback to inform and improve our future work and enable us to demonstrate how this feedback has influenced our work.

It is vital to the work of the IPCC that there is public confidence in how we discharge our responsibilities. In order to support this and in keeping with our value of 'openness', we will publish our operational manuals and the reports of the investigations we undertake where possible. Additionally, we will seek feedback from the parties involved in investigations undertaken by the IPCC (both complainants or next of kin and police officers or staff subject to investigation) and from complainants who have appealed to the IPCC.

The IPCC will conduct a Public Confidence Survey regularly in order to assess confidence in the IPCC and the wider police complaints system.

Ensuring the accessibility of the complaints system

Ensuring the complaints system is accessible is a responsibility shared between the IPCC, police forces and police authorities. IPCC Commissioners will monitor and encourage police forces and police authorities to be proactive in discharging this responsibility.

The IPCC will seek to encourage people to have the confidence and necessary information to complain, as well as encouraging them to work with the police service to resolve their complaints. To this end, we have developed an Access Strategy which supports the IPCC aims of increasing awareness, accessibility and engagement in the complaints system. The overarching principles of this strategy are:

- The IPCC believes that best way for citizens to make complaints against the police is to their local police force and will work with forces to ensure there is effective local access to the complaints system
- The IPCC will provide appropriate and cost effective ways for people to access its services, designed with the needs and preferences of customers in mind
- The IPCC will seek to encourage greater usage of the most cost effective contact methods
- The IPCC will not discriminate by limiting the choice of contact methods available

The IPCC will work closely with police forces to implement the strategy and improve local access for complainants. We also support access by providing information leaflets on the complaints system; not only for complainants but also for police staff and officers and providing an enquiries and signposting service for members of the public.

We will also use our community engagement activities and intelligence gathered through our performance framework and casework and investigations functions to identify inhibitors to access which can then be addressed at our regular meetings with police forces and authorities or through strategic projects as required.

Promoting policing excellence by drawing out and feeding back lessons arising from the IPCC's work

One of the IPCC's most important functions involves promoting excellence in policing by drawing out and feeding back learning from complaints and investigations to enable the service to learn from mistakes and reduce the likelihood of recurrence. One way in which we do this is by recommending changes to policing policy and practice in light of investigation findings and appeal reviews. The IPCC is committed to making learning recommendations which are evidence-based, consistent, specific and practical and which focus on the issues that matter most to the public.

The IPCC captures learning from investigations and appeals and from other intelligence such as the performance framework, research, analysis and guardianship activities. It has established an interagency forum that is tasked with providing a strategic focus on this intelligence and learning and ensuring that it has a positive impact on operational policing. The group is made up of key stakeholders who will identify issues and themes, advise on the dissemination of learning and good practice across the police service (and wider policing family) and agree and monitor coordinated action to address the issues identified.

We will work with our stakeholders to ensure that systems are in place to allow the implementation and impact of recommendations to be effectively monitored and followed-up. We will also publish a tri-annual bulletin of cases demonstrating local or national learning recommendations as well as good practice which may be relevant across the police service.

Strategic Guardianship Projects

In addition to the core guardianship activities the IPCC will deliver strategic guardianship projects. These are areas of thematic work which are conducted for a fixed period of time and seek to achieve defined objectives.

As part of the IPCC's annual corporate planning process, the Commission will develop and annually refresh a three year programme of guardianship project work.

This programme will be informed by:

- The specific priority issues agreed by Commission;
- Performance of the system, as measured by the Performance Framework;
- Research undertaken on particular issues;
- Intelligence from investigations and appeals; and
- Issues identified through our guardianship activities and intelligence arising from community engagement activities.

The IPCC's current programme of work, setting out our strategic guardianship projects for 2011/12 to 2013/14 is included in the next section.

Section 2: Priority Issues and Strategic Guardianship Projects

Specific Priority Issues 2011/12

The Commission has identified six specific issues of priority where we will focus our attention and resources in 2011/12 to ensure that police forces learn and improve, such incidents and complaints reduce in number and public confidence improves. These issues will guide our work under each of the four elements of guardianship, as detailed in section 1.

The current priority issues are:

Deaths and serious injury;

- in police custody,
- as a result of police use of firearms and less lethal weapons,
- as a result of gender abuse and domestic violence, where it is alleged that the police have failed to protect the victim,
- following road traffic incidents, which it is alleged the police have caused or failed to prevent;

Additionally, and in view of the potential for significant public concern, we will also focus on learning from:

- police use of stop and search powers, and other issues affecting young people's confidence in the police,
- policing of protests and public order incidents

Strategic Guardianship Projects 2011/12 – 2013/14

The table below sets out the strategic guardianship projects which have been agreed by Commission and form part of the current Corporate Plan.

Project	Description	Delivery Date
Implementation of Access Strategy	We will work with the police to ensure there is effective local access for complainants including a review of the information made available to complainants and the training provided for front desk staff	December 2011
Implementation of Right First Time Campaign	Using information from the performance framework and learning from appeals, we will design targeted interventions that help the police to improve local complaint handling by implementing the principles of our Statutory Guidance	December 2011
Report into Deaths Following Police Contact	We will publish a national report on deaths following police contact in 2010/11.	March 2012
Community Engagement	We will continue our programme of engagement with groups who represent communities who may come in to contact with the police, in order to promote the complaints system, learn from their experiences and improve public confidence.	March 2012
Programme of work to reform the Complaints System	We will complete a programme of work to implement the reforms to the complaints system set out in the Police Reform and Social Responsibility Bill. This will include: <ul style="list-style-type: none"> - Revision of the Police Statutory Guidance, our Operations Manual and public information - Developing our performance framework in order to maintain effective oversight of all complaints - Developing the policies and processes required to discharge our new role in reviewing complaints about Police and Crime Commissioners 	May 2012

Section 3: Delivering Guardianship

The IPCC's guardianship role links to and draws on all aspects of our work and, as such, responsibility for delivery is shared across the organisation.

The following section outlines the key roles required to deliver guardianship successfully across the IPCC, along with an outline of the guardianship responsibilities of each of our four directorates. A table summarising who has primary responsibility for delivering our core guardianship activities is provided at Annex A.

Key Guardianship Roles

Commissioners

IPCC Commissioners have overall responsibility for ensuring confidence in the police complaints system and for the IPCC's guardianship functions. They are our public face and provide visible leadership in the delivery of our core guardianship activities and strategic projects.

Each operational Commissioner is individually responsible for guardianship activities relating to a group of police forces within a particular regional area. Commissioners are responsible for developing and maintaining effective relationships at a senior level with the organisations for which they have oversight.

Commissioners will provide strategic oversight of the extent to which complaint processes within their forces secure public confidence and ensure the accessibility of the complaints system. This will be done, both directly and through staff, by monitoring performance data and information arising from our investigations and appeals and other casework activities and through feedback from stakeholders.

Commissioners are responsible for playing an active role in ensuring that the lessons arising from the IPCC's work are learnt. To this end, Commissioners are responsible for ensuring that:

- recommendations made by the IPCC to forces are evidence-based, consistent, specific and practical and which focus on the key issues;
- national recommendations are sent to the relevant national body with a response requested.

In addition to their local guardianship responsibilities, operational Commissioners will be allocated responsibility for one or more of the agreed priority issues. Responsibilities and the actions required will differ from issue to issue and Commissioners, supported by other leads across the organisation, will work to develop a set of outcomes for each area and a plan of activities to deliver those.

Central Coordination

Recognising the breadth of guardianship activities delivered across the IPCC, some central co-ordination is required to ensure consistent messages are being provided and that information from interactions with stakeholders is collected in a way which can be used across the organisation. This central coordination is provided by our corporate

communications team, working with the Commission Secretariat. It enables outwardly facing staff and Commissioners to undertake their guardianship activities effectively by:

- Facilitating the delivery of core corporate messages at a local level;
- Ensuring staff and Commissioners have access to up-to-date messages on high profile cases, major projects and areas where we have an agreed position (such as taser use or stop and search);
- Managing a system to centrally record and share relevant information resulting from interactions with our stakeholders;
- Helping to ensure that the development of IPCC policies and practices and our engagement with stakeholders at a national level is informed by intelligence gained from our local guardianship activities.

Local Guardianship with Forces

Consistent with the principle of delivering guardianship at a local level, the delivery of the IPCC's guardianship strategy requires a regional guardianship function to:

- Collate information and intelligence from local operational activities and identify key thematic trends or recurring issues within and across local forces;
- Work at a strategic level with local forces to improve performance delivering complaint and conduct resolution for the public
- Support Commissioners in their interactions with Police Authorities and force ACPO rank officers and high level PSD contacts;
- Act as an escalation point for issues impacting on the delivery of the police complaints system arising through our investigations and casework functions; and

Directorate Responsibilities

Business Services Directorate

The central coordination function, outlined above, will be delivered within the Business Services Directorate. Business Services will further support the delivery of our guardianship activities at a national level by:

- Influencing and coordinating the ongoing development of our guardianship strategy, strategic priorities and specific priority issues
- Overseeing the ongoing development and implementation of our Statutory Guidance.
- Collation of national and local learning recommendations and the production of tri annual Learning the Lessons Bulletins
- Supporting the work of the interagency forum providing a strategic focus on the intelligence and learning from the complains system, and working with internal and external stakeholders to deliver improvements to the complaints system and policing as a whole.
- Developing policy in relation to the specific priority issues
- Supporting our international work with other oversight bodies.
- Producing and distributing information material in printed and digital form to improve access to the system.
- Providing media and communications support to guardianship activities and priorities.

Casework and Customer Services Directorate

The IPCC's regionally based guardianship function, outlined previously, will be delivered through the Casework and Customer Services Directorate. Casework and Customer Services will further support the delivery of the IPCC's guardianship function by:

- Providing telephone and written advice and information to the public to facilitate access to the complaints system.
- Identifying and escalating to the local guardianship lead any serious performance or thematic issues or trends arising in direct complaints or in cases reviewed by Casework or investigated under Casework supervision.
- Monitoring force performance and maintaining regular contact with PSD staff to discuss and resolve any operational and performance issues and highlight or disseminate good practice.
- Ensuring any local or national learning recommendations made as a result of appeal reviews are approved by the relevant Commissioner in accordance with IPCC operational policies.
- Supporting Commissioners to develop and deliver community engagement activities in relation to the specific priority issues.

Investigations Directorate

The Investigations Directorate will support the delivery of the IPCC's guardianship function by:

- Identifying and escalating to the local guardianship lead any serious performance or thematic issues or trends arising in our managed and independent investigations.
- Ensuring any local or national learning recommendations proposed are evidence-based, consistent, specific and practical and which focus on the key issues.
- Sharing learning and good practice regarding complaint, conduct and DSI investigations with police forces.
- Providing operational expertise to support Commissioners with lead responsibility for specific priority issues.

Standards and Quality Directorate

As part of our responsibility to promote confidence in the complaints system, it is essential that we work to ensure that users of the system have confidence in the decisions made by the IPCC. The Standards and Quality Directorate will be central to delivering this aspect of our guardianship function through its remit to:

- Develop and manage an effective process for internal learning in investigations and casework;
- Develop an efficient system for monitoring whether the organisations falling within our jurisdiction have addressed learning recommendations from investigations; and
- Develop a system of external scrutiny for the investigations undertaken by the IPCC.

The Standards and Quality Directorate will also provide key intelligence on the performance of the complaints system through its Analytical Services function which will:

- Maintain and develop the Performance Framework, producing performance reports, and complaints statistics;
- Producing research, statistics and analysis as directed by our statutory obligations, guardianship priorities and strategic priority issues; and
- Analysing feedback from our customers regarding our own role in the police complaints system.

Annex A**Core Guardianship Activities – Summary of Responsibilities**

Type of Activity	Responsibility
<i>Setting, improving, reviewing and monitoring standards for the operation of the police complaints system</i>	
Meetings with ACPO level officers at local forces	Commissioners / Casework & Customer Services
Police Authority Meetings	Commissioners / Casework & Customer Services
Attend Regional PSD Meetings	Commissioners / Casework & Customer Services
Regular meetings with local PSDs	Casework & Customer Services
Bi-laterals with key partners <ul style="list-style-type: none"> Ministers & Home Office Officials ACPO leads & Committees Association of Police Authorities HM Inspectorate of Constabulary National Policing Improvement Agency Crown Prosecution Service 	CEO & Chair (supported by Business Services)
Performance Framework – including production of quarterly Complaints Information Bulletins	Standards and Quality
Publish annual complaints & deaths statistics	Standards and Quality
Maintain updated Statutory Guidance	Business Services
International Cross Working	Business Services
<i>Promoting confidence in the complaints system as a whole amongst the public and police</i>	
Develop and maintain relationships with complainant representative organisations	Commissioners / Casework & Customer Services / Business Services
Develop and maintain relationships with community leaders, groups and organisations	Commissioners / Casework & Customer Services
Develop and maintain relationships Police Staff Associations	Commissioners / Casework & Customer Services / Business Services
Public Confidence Survey	Standards and Quality
Collection and analysis of IPCC customer feedback	Standards and Quality
<i>Ensuring the accessibility of the complaints system</i>	
Provision of telephone and written enquiries service	Casework & Customer Services
Development and distribution of information materials (printed and digital)	Business Services
Monitoring and encouraging police forces to be proactive in ensuring accessibility of the complaints system	Commissioners
<i>Promoting policing excellence by drawing out and feeding back lessons arising from the IPCC's work</i>	
Learning the Lessons – including the production and circulation of bulletins	Business Services
Making effective learning and national recommendations as a result of our investigations and appeal reviews	Commissioners / Investigations/ Casework & Customer Services