

Independent Police Complaints Commission

Business Plan
2016/17

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1. Introduction



Introduction

This Business Plan runs alongside our 2015/16-2017/18 Corporate Plan. Our Corporate Plan explains the structure and functions of the IPCC and sets out our remit and three-year strategy.

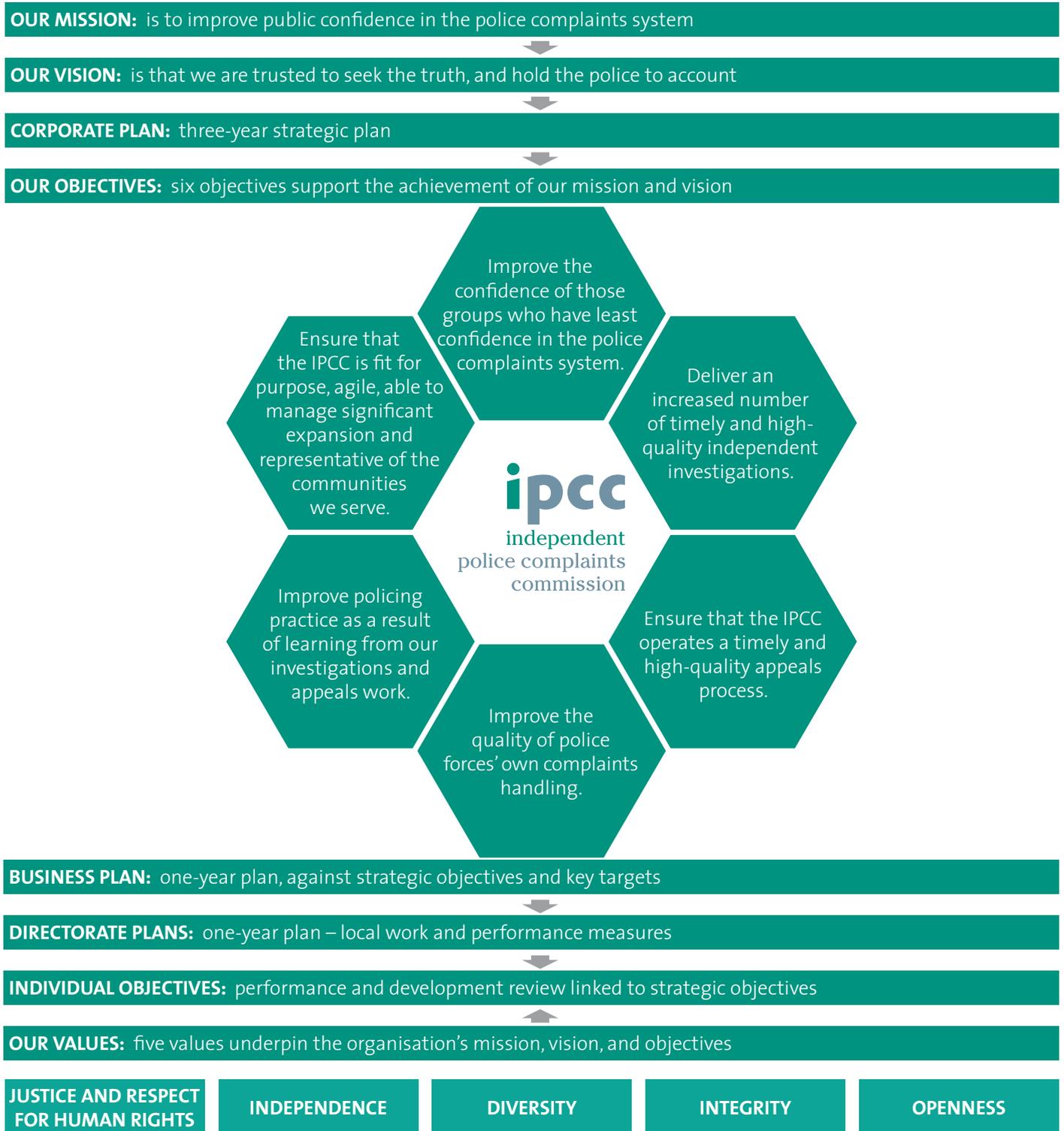
In 2016/17 the IPCC is facing significant change, which will impact on the delivery of our work. Alongside preparing for change in the governance of the IPCC, we will be completing our expansion programme and be preparing to implement legislative change to the police complaints and discipline systems. This has meant we have had to carefully prioritise the work we propose to deliver and we may have to amend this Business Plan throughout the year.

This 2016/17 Business Plan sets out:

- Our planned work for the coming year under our strategic objectives.
- The key targets and management information we will be monitoring.
- The high-level risks associated with delivering our work.

Delivery of our Business Plan is monitored through our Management Board and Commission. More detailed plans that underpin the delivery of the Business Plan are monitored by our Change Programme Implementation Board and by Directorates. The diagram on page 5 sets out how our plans help to deliver our vision, purpose, objectives and values.

Figure 1 – Delivering the IPCC vision, purpose, objectives and values.



2. Delivering our strategic objectives



Delivering our strategic objectives

Strategic objective 1

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

Our most recent public confidence survey (2014)¹ shows that much of the population of England and Wales has heard of the IPCC and is 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 have not heard of the IPCC and who do not trust either the complaints system or the IPCC's independence².

We will improve confidence first and foremost by ensuring that the IPCC's investigation and appeals work is of a high-quality. This includes implementing a new quality strategy, which will verify that our work is delivered to the highest standards. We will continue to work with police forces to help them make

sure that people who want to complain have suitable access to the complaints system, and that they deal with those complaints properly.

In 2014, we published our three-year oversight and confidence and stakeholder engagement strategies³. These set out how we will continue our work to improve confidence in the police complaints system. Our experience of engagement work tells us that it works. We recently conducted extensive stakeholder engagement to inform a redraft of our guidelines for handling allegations of discrimination. This provided invaluable insight into where and how improvements can and must be made across the police complaints system. We will build on this work in 2016/17.

¹ Harvey, P, Shepard, S and Magill T (2014) Public confidence in the police complaints system: a survey of the general population in 2014, London: Ipsos MORI (commissioned by the IPCC) www.ipcc.gov.uk/page/public-confidence

² In 2004, the public were asked how confident they would be that they would know how to make a complaint against the police (www.ipcc.gov.uk/page/public-confidence). Three in five said they were either very or fairly confident (62%), though over a third (38%) felt either not very or not at all confident. The least confident are those in the 15-24 age bracket. Awareness of the IPCC has increased slightly since the baseline survey in 2004 from 62% to 64%. However, awareness varies significantly by ethnicity, with just one in three (32%) people from minority ethnic groups aware of the IPCC. This compares with 74% of white members of the public surveyed in 2014. Younger members of the public, those aged 44 or under are also less likely to have heard of the IPCC (50%).

³ www.ipcc.gov.uk/page/oversight-and-confidence-and-engagement-strategies

What will we do in 2016/17?

To improve the confidence of those people who have least confidence in the police complaints system we will:

- Provide information about how to make a complaint against the police, information about the work of the IPCC and respond to general enquiries via our Customer Contact Centre.
- Deliver open, honest and transparent communications to raise community and stakeholder confidence.

To implement year three of our stakeholder engagement strategy, we will continue to develop stronger relationships with our stakeholders at national, regional and local level. We will improve our understanding of their needs and involve them in the design of both our services and the wider complaints system. We will carry out the following projects next year:

- **Deliver a strategic, proactive and co-ordinated approach to community and stakeholder engagement.** This work will involve:
 - Revising our Stakeholder Engagement Strategy to reflect the vision for stakeholder engagement set out in our target operating model⁴ (TOM).
 - Implementing our approach to community and stakeholder

engagement during critical investigations.

- Developing our engagement approach and processes to promote access to and confidence in the complaints system.
 - Creating a framework for identifying stakeholders and managing relationships – including reviewing our current memorandums of understanding (MOUs) and determining when and how these should be changed.
 - Working across the organisation to ensure that stakeholder engagement is incorporated into all of our work.
 - Developing an annual open Commission meeting which aligns to our business planning process.
- **Collect user feedback**

During 2015/16 we spoke with people who had been involved in an IPCC investigation to gain a better understanding of their experiences. We will continue this work into 2016/17, developing processes to collect feedback regularly from people who the IPCC has contact with as part of our investigations. We will also hold another listening day for bereaved families to understand their experience of our investigations and assess the impact of changes we have implemented

⁴ Defines what the IPCC will look like and how it needs to operate when independently investigating all serious and sensitive cases and improving public confidence in the complaints system.

since the last event. We will use this information to continue to inform our work on the Change programme.

• **Conduct a public confidence survey**

We will conduct a seventh public confidence survey to continue to measure trends in public confidence in the complaints system. The survey asks about:

- contact with the police
- people’s willingness to complain
- barriers to complaining
- ways in which members of the public may wish to complain
- awareness of the IPCC

The results from the survey will influence our work in the future.

• **Conduct a stakeholder survey**

In early 2016 we ran a survey to create a baseline measure of external stakeholder perception. This looked at our stakeholders’ understanding of and experiences with the IPCC, as well as with the wider complaints system. We will continue this work in 2016/17 to further explore key drivers of perceptions of the IPCC, consider what and how to improve and develop an approach to monitor this over time.

Figure 2 – Objective 1: summary of projects for 2016/17.

Ref	Project	Directorate
1.1	Deliver a strategic, proactive and co-ordinated approach to community and stakeholder engagement.	Strategy and Impact
1.2	Collect user feedback.	Strategy and Impact
1.3	Conduct a public confidence survey.	Strategy and Impact
1.4	Conduct a stakeholder survey.	Strategy and Impact

Outcome measure

Figure 3 – Objective 1: outcome measure and target.

Outcome measure	Target
% of those with least confidence (young people and those from BME groups) who are likely to make a complaint if they were unhappy about how a police officer behaved towards them.	A statistically significant increase ⁵

⁵ On 64% (young people) and 66% (people from BME communities) reported via the public confidence survey.

Strategic objective 2

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

Through our Change programme we are implementing a new operating model to change how we work. This is to make sure that we have the capacity and structure required to undertake significantly more independent investigations into serious and sensitive issues. We also are making sure that our investigations are delivered to a high-quality and seeking to improve the timeliness of our investigations by embedding quality systematically in our investigations, and within all the work carried out by our Operations Directorate.

We will investigate independently more of the matters that are currently referred to us – for example, those alleging use of excessive force, corruption or failure of duty. We would also expect to take on more cases that involve vulnerable victims, such as domestic violence, rape or child exploitation. Our view is that investigating ‘sensitive cases’ gives us the flexibility to take on cases that may not individually be ‘serious’, but that collectively affect public confidence or otherwise cause concern.

Where we do not feel that an independent investigation is appropriate we will also continue to conduct

managed investigations into some of these matters. While we may also conduct supervised investigations, we intend to conduct fewer of these in anticipation of new legislation to change the complaints and discipline system being enacted. Similarly, we will trial a more intensive mode of managed investigation in anticipation of new directed investigations.⁶

What will we do in 2016/17?

To achieve this objective we will deliver the following work in 2016/17:

- Receive and assess approximately 4000 referrals in order to decide the mode of investigation.
- Conduct between 600-900 independent investigations.
- Conduct fewer managed and supervised investigations.
- Provide an investigations support function.
- Provide a cost-effective and efficient on-call response system.

⁶ A directed investigation will be an alternative to independent investigation. These will be carried out where although they merit independent investigation this can only appropriately be carried out as police-led inquiries under our direction.

- Provide legal advice and representation to Operations and to the Hillsborough investigation.
- Make sure that our operations staff receive appropriate training, development and accreditation.

We will also deliver the following projects:

- **Define and implement new quality assurance approaches for referrals and investigations**

In 2015/16 we established a new Quality Review Unit in our Operations Directorate and tested new approaches to quality assurance in investigations. We will build on this work to make sure that there is a shared understanding of what good looks like, which is reflected in our operations manual,⁷ training and staff objectives, and which is validated against internal and external feedback. We will deliver revised quality assurance approaches across referrals and investigations that allow quality issues to be identified and corrected as they arise. These new approaches will also make sure that themes, trends and learning are captured and acted upon. We will also arrange periodic external reviews of closed cases.

- **Develop new and improved operations manual for referrals and investigations**

The IPCC Operations Manual guides our staff on the expectations placed

on them in operational work. It also provides advice about specialist areas and shares knowledge and best practice. The IPCC is growing, the work it does is changing, and the context is one in which it will be necessary for the IPCC to operate differently. We will create a new Operations Manual: a comprehensive and up-to-date source of advice, guidance and expectations of all staff working on our investigations, which can be updated as we change over the coming years.

- **Design and establish a new Directorate of Major Investigations**

We will set up a Major Investigations Directorate, which will include the Hillsborough investigation and our themed work, such as cases that involve child sexual exploitation. We have appointed a new Director of Major Investigations and this project will design the organisational structures and teams required and identify any new roles that are necessary for the directorate. It will also identify and implement actions required to set up the new directorate.

- **Develop an assessment framework and process for handling referrals and investigations**

We will develop and document a new approach to assessing work as it comes into the IPCC, selecting matters for the

⁷ The IPCC Operations Manual guides our staff on the expectations placed on them in operational work. It also provides advice about specialist areas and shares knowledge and best practice.

IPCC to investigate, allocating that work, and handling it thereafter. We have published the factors⁸ we are trialling to help us consider the seriousness and sensitivity of matters that are referred to us and we will review these factors to make sure that they remain appropriate. This work will provide a consistent and robust process for all work that comes into the IPCC. It will enable us to select the most serious and sensitive cases for investigation, provide clarity around roles and responsibilities, and facilitate improved risk and resource management. In turn, this will lead to increased productivity.

- **Deliver police extranet project**

We will continue to deliver a more efficient system for police forces to submit information to us via a secure website. This project will make sure that the 16 police forces that have not been involved in our pilots so far can use our police extranet system.

- **Implement the investigation delegation model evaluation findings**

To enable us to carry out more independent investigations we developed an Investigation Delegation Model which guides decisions about which cases Commissioners should be involved in and defines who is responsible for decision making when the Commissioner role is

delegated. We evaluated this work and identified actions to develop and improve it further.

- **Design and implement improvements to the process and products related to final investigation reports**

Because we will be delivering an increased number of independent investigations, it is vital that we develop the quality of the work we produce and make sure that all our processes are efficient. We know that producing investigation reports consumes a significant amount of investigators' time. We also know that they are one of the most important outward-facing products, scrutinised by both people who have been directly affected by the matters under investigation and the public. Therefore, making sure that these documents are produced efficiently and to an appropriate standard will support us to manage an increased number of investigations, and improve the quality of the service we provide.

The project will look at the processes involved in every stage of creating an investigation report, from drafting through to publication and will test the use of external editors.

⁸ http://www.ipcc.gov.uk/sites/default/files/Documents/publications/Referrals_Assessing_seriousness_and_sensitivity_draft_factors.pdf

- **Review our policy on publishing investigation reports/our findings**

The IPCC's current default position is to publish all investigation reports on our external website unless there is a good reason not to.⁹ In practice, it is sometimes necessary for us to refrain from publishing particular investigation reports or report content. In the context of us carrying out considerably more independent investigations, we will revisit our publication policy and guidance in order to make sure we promote transparency in our work.

- **Develop a strategy to improve the way we liaise with people directly affected by our operational work**

This work will define the IPCC's approach to working with different groups of people affected by our operational work. For example, complainants, families, appellants, witnesses and people who are under investigation. This will improve the quality, consistency and efficiency of the service we provide to these groups.

- **Improve arrangements for meeting our operational disclosure obligations and consider the requirement for specialist roles**

This project will examine our various operational disclosure obligations and consider how best to deliver this area of work. For example, by considering

whether a new role specialising in disclosure is required and how to share knowledge and best practice.

- **Pilot and evaluate a new way of delivering our trainee investigator programme**

In order to cater for a larger number of operational staff, we need to ensure that trainees are trained, mentored and supported appropriately to ensure that they deliver quality work in accordance with our policies and values. The pilot and evaluation will include:

- reviewing different training delivery methods
- piloting a new formal mentoring programme
- reviewing and trialling a new line management structure for trainee investigators

- **Review the equality and diversity aspects of core training for investigators**

We need to make sure that IPCC investigator roles are attractive to a diverse range of people, including those with protected characteristics. We will be reviewing whether the delivery of investigator training indirectly discriminates against those with a protected characteristic and consider the content of the training to make sure it addresses elements of diversity. The review will include:

⁹ s. 4, IPCC/ACPO Media Protocol 2009.

- Examining methods to embed discussion on unconscious bias as a theme within the training.
 - Considering amendments to material to make sure it is representative of a diverse range of people.
 - Exploring whether amendments to scheduling are needed to make sure this does not indirectly discriminate against those with a protected characteristic.
 - Making sure the pre-course reasonable adjustments process accommodates any requirements from those with a protected characteristic for the training.
- **Deliver the Hillsborough investigation**

Following the conclusion of the Hillsborough inquest, the IPCC will conclude its independent investigation and the managed aspects of Operation Resolve investigation that concern the actions of the police. The IPCC will continue to work with the Crown Prosecution Service (CPS) to provide material to support its assessment of potential criminal proceedings. This will include undertaking a significant disclosure process of investigative material.

- **Manage the transition of Hillsborough staff**

As aspects of the investigation conclude the number of staff required will begin to reduce. In the context of an expanding IPCC and the introduction of a Major Investigations Directorate, the transfer of some staff into other areas of investigation work is being considered. We will make sure there is a planned and smooth transition of appropriate staff.

- **Finalise our memorandum of understanding and working arrangements with the CPS**

We have had to amend our memorandum of understanding (MOU) with the CPS due to the increase in number of independent investigations we will be conducting. The MOU sets out the arrangements for liaison between the IPCC and the CPS during and following IPCC independent investigations. This project will involve finalising the MOU with the CPS and putting the new MOU into practice by developing new ways of working to improve communication, timeliness and file standards for the investigations we refer to them.

Implement legislative change

The Home Office is in the process of amending the Police Reform Act 2002 in order to simplify the police complaints and discipline systems. We expect these changes to come into effect during 2017. This means we will need to develop new processes for the referrals we receive and the assessment we conduct to determine the mode of investigation. Legislative change will also impact on how we conduct our independent investigations. As we cease to be able to conduct supervised and managed investigations, we will need to develop processes around our forthcoming new ability to conduct a directed investigation. We will also need to consider the outcomes available at the end of an investigation or appeal, and the impact on any disciplinary processes that may follow. These projects will include:

- defining new operational processes
- reflecting any changes to practice in the operations manual
- considering the training for staff
- updating the information we provide

Changes to legislation will also allow police and crime commissioners (PCCs) to take responsibility for fire service staff. Where a PCC chooses to do this, it is anticipated that fire service personnel will become subject to the complaints system and fall under our jurisdiction. We will need to consider the skill needs of our staff and prepare and build the expertise to handle these cases, and consider the changes that will be needed to our operational practice.

We will also consider the implications for us of our new jurisdiction over the Gangmasters Licensing Authority (GLA). We will scope the implications of this remit, and consider any drafted legislation that covers this. We will then consider how we communicate this new remit to the public, as well as any appropriate changes to operational practice.

Figure 4 – Objective 2: summary of projects for 2016/17.

Ref	Project	Directorate
2.1	Define and implement new quality assurance approaches for referrals and investigations.	Operations
2.2	Develop new and improved operations manual for referrals and investigations.	Operations
2.3	Design and establish a new Directorate of Major Investigations.	Operations
2.4	Develop an assessment framework and process for handling referrals and investigations.	Operations
2.5	Deliver police extranet project.	Operations
2.6	Implement the investigation delegation model evaluation findings.	Operations
2.7	Design and implement improvements to the process and products related to final investigation reports.	Operations
2.8	Review our policy on publishing investigation reports/our findings.	Strategy and Impact
2.9	Develop a strategy to improve the way we liaise with people directly affected by our operational work.	Operations
2.10	Improve arrangements for meeting our operational disclosure obligations and consider the requirement for specialist roles.	Operations
2.11	Pilot and evaluate a new way of delivering our trainee investigator programme.	Operations
2.12	Review the equality and diversity aspects of core training for investigators.	Operations
2.13	Deliver the Hillsborough investigation.	Operations
2.14	Manage the transition of Hillsborough staff.	Operations
2.15	Finalise our memorandum of understanding and working arrangements with the CPS.	Operations

Ref	Project	Directorate
2.16	Develop and implement processes for jurisdictional changes including: <ul style="list-style-type: none"> • fire service • Gangmasters Licensing Authority. 	Operations
2.17	Implement legislative change affecting referrals.	Operations
2.18	Implement legislative change affecting independent investigations.	Operations
2.19	Implement legislative change affecting managed and supervised investigations and the creation of new directed investigations.	Operations
2.20	Implement legislative change affecting the outcomes available at the end of investigations and appeals.	Operations
2.21	Implement legislative change affecting the disciplinary processes.	Operations

Outcome measure

Figure 5 – Objective 2: outcome measure and target.

Outcome measure	Target
Number of independent investigations:	
i. Started	600-900 investigations
ii. Completed within 12 months	80%

Strategic objective 3

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

All appeals about the non-recording of complaints are dealt with by the IPCC. We also deal with any appeals where the original complaint relates to the conduct of a senior officer or a complaint that must be referred to the IPCC¹⁰. Under our new operating model, we will need to continue to make sure that our appeals process is efficient and that quality is high.

We have changed the way we conduct and report appeals in response to the results of our appellant survey and feedback from forces. We will continue to put quality at the centre of what we do and will build on this as we change our operating model.

What will we do in 2016/17?

To achieve this objective we will deliver the following work in 2016/17:

- Receive and process approximately 12,000 direct complaints.
- Receive and respond to enquiries.
- Provide an administration hub.

- Receive, assess, decide upon and respond to approximately 1500 non-recording appeals.
- Receive, assess, decide upon and respond to approximately 2000 investigation appeals.
- Receive, assess and respond to approximately 250 local resolution, discontinuance and disapplication appeals.

We have planned the following project work under this objective in 2016/17:

- **Define and implement a new quality assurance approach for appeals**

This work will draw on the lessons learned from work undertaken in 2015/16 to trial new quality assurance processes for our investigations. We will build on this and will deliver a revised quality assurance approach for appeals that allows quality issues to be identified and corrected as they arise. These new approaches will also make sure that themes, trends and learning are captured and acted upon. This work

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

will also make sure that there is a shared understanding of what good looks like, which is reflected in our operations manual, training and staff objectives.

• **Revise operations manual for appeals**

As well as developing our Operations Manual for our investigations work we will also make sure our staff working on appeals has a comprehensive and up-to-date source of advice, guidance and expectations for the work they carry out. This will make sure there is consistency and improved quality in the work on appeals and will provide advice, share knowledge and best practice in this area.

Implement legislative change

We will need to consider the implications of reform to the complaints and discipline systems on our appeal processes. This will include:

- defining new operational processes
- reflecting any changes to practice in the operations manual
- considering how overarching changes to the complaints and discipline systems will affect our operational work, including our liaison with the public and stakeholders

Figure 6 – Objective 3: summary of projects for 2016/17.

Ref	Project	Directorate
3.1	Define and implement a new quality assurance approach for appeals.	Operations
3.2	Revise operations manual for appeals.	Operations
3.3	Implement legislative change affecting appeals.	Operations
3.4	Implement overarching legislative change.	Operations

Outcome measure

Figure 7 – Objective 3: outcome measure and target.

Outcome measure	Target
% of investigation and local resolution appeals completed within 35 working days	60%
% of non recording, discontinuance, disapplication appeals completed within 25 working days	80%

Strategic objective 4

Improve the quality of police forces' own complaints handling.

The IPCC has an important role in overseeing the police complaints system as a whole in order to help improve the way the majority of complaints are handled. Our oversight and confidence strategy sets out how we will gather information and intelligence, from various sources, to assess how well complaints and appeals are being handled by forces.

Key to this is implementing our knowledge and information management (KIM) strategy, which sets out how we will use data and intelligence, drawn from inside and outside of the organisation, to inform our work. This will include:

- the information and learning we capture when we process cases
- data we collect from forces about their complaints handling
- intelligence from our work with stakeholders and community groups

We will use this to develop an intelligence model to assess emerging trends and risks. This will inform our oversight work as well as decisions about operational work.

Our commissioners and force liaison staff will work with forces to understand their performance and challenge them to improve where necessary. By issuing

Statutory Guidance and other guidelines we will make sure that forces are clear about the standards expected. This will help to improve consistency across the complaints system. We will also engage with forces to promote transparency around complaints handling.

What will we do in 2016/17?

To achieve this objective we will deliver the following work in 2016/17:

- Publish two editions of *Focus* – our regular publication that provides police forces with detailed guidance and case studies to help them improve their complaints handling.
- Conduct regular oversight meetings to discuss regional and national aspects of complaints handling, challenge forces' performance and offer additional guidance where appropriate.
- Collate and publish official statistics on police complaints and develop further the interactive complaints data on our website.
- Publish performance data for the complaints system; providing quarterly complaints information for each police force with comparisons to the national trends and most similar forces.

- Provide information and intelligence into Her Majesty's Inspectorate of Constabulary (HMIC) police effectiveness, efficiency and legitimacy programme (PEEL) assessments on improving forces complaints handling.

We have planned the following projects under this objective in 2016/17:

- **Develop our future oversight model**

As the IPCC grows, we will consider whether our oversight model meets our needs and is in line with changes to legislation and our governance structure. This will include:

- A proposal for our future oversight model.
- A defined process for gathering information about forces, highlighting issues, and prioritising work based on risk.
- A plan for how the IPCC communicates with forces.
- Setting out outcome measures and reporting on these.

- **Conduct a review of the way that police forces handle complaints that include an allegation of discrimination**

Following the publication and implementation of new guidance on handling complaints about discrimination in 2015/16, we will review and report on how forces are handling allegations of discrimination using this guidance.

Implement legislative change

To implement changes to the complaints and discipline system we will need to develop new processes, information and guidance for PCCs, forces and members of the public. Preparatory work will include:

- **Revise our statutory guidance to the police and include contractors**

Following the revision of legislation and regulations, which will reflect the changes to the police complaints system, we will have to develop, consult on and implement Statutory Guidance for police forces. This will provide guidance on implementing the changes to the system and how complaints should be handled. The guidance will also include complaints against staff who are contracted to the police service, who are now included in the police complaints system.

- **Review regulations and prepare statutory guidance for the National Crime Agency (NCA)**

The NCA comes under the jurisdiction of the IPCC. The regulations for the NCA are all based on the Police Reform Act 2002 and other supporting regulations, which will be amended in proposed changes to simplify the system. We will therefore need to review the regulations to identify what changes are needed to make sure these are all in line with the police complaints system.

Once regulations have been amended we will have to produce statutory guidance to set out how the NCA should handle complaints.

To implement the changes to the complaints and discipline systems the Home Office, College of Policing (CoP) and the Association of Police and Crime and Commissioners (APCC) will all develop guidance. We will help and review these documents to make sure that our guidance to forces is consistent.

Figure 8 – Objective 4: summary of projects for 2016/17.

Ref	Project	Directorate
4.1	Develop our future oversight model.	Strategy and Impact
4.2	Conduct a review of the way that police forces handle complaints that include an allegation of discrimination.	Strategy and Impact
4.3	Revise our statutory guidance to the police and include contractors.	Strategy and Impact
4.4	Review regulations and prepare statutory guidance for the NCA.	Strategy and Impact
4.5	Review guidance produced by the Home Office, the CoP and the APCC.	Strategy and Impact

Outcome measure

Figure 9 – Objective 4: outcome measure and target.

Outcome measure	Target
% appeals upheld	A statistically significant reduction ¹¹

¹¹ Baseline – 41% investigation appeals; 39% non-recording appeals.

Strategic objective 5

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

The IPCC cannot change policing on its own. Working with others – such as the National Police Chiefs’ Council (NPCC), PCCs, the CoP, HMIC, service users, and communities – we will make sure that our investigations and the complaints system as a whole are part of a continuous circle of learning and improvement for policing in England and Wales.

We will continue to work with PCCs, the CoP, HMIC and forces to make sure that learning is identified, implemented and embedded into policing at all levels of the service. Over time, this will help improve and inform performance, standards and training, and prevent issues arising.

Implementing our KIM strategy will help make sure we are capturing, using and sharing the knowledge and information we have as an organisation. Having a structured and strategic approach to knowledge and information management will allow us to:

- show the impact our work is having
- give us the tools to identify the latest trends in police complaints
- allow us to identify recommendations we have made in specific areas and the results of those

What will we do in 2016/17?

To achieve this objective we will deliver the following work in 2016/17:

- Use learning from our work to inform and respond to external reviews and consultations that are relevant to the police complaints system.
- Work with HMIC and Her Majesty’s Inspectorate of Prisons (HMIP) to share learning from our work to inform their inspections.
- Collate and publish annual national statistics on deaths following police contact.
- Continue to work on policy areas – such as deaths in custody, mental health, stop and search, domestic violence, gender and Tasers – and use learning from our work to inform operational policing practice, especially to support the development of the CoP’s Authorised Professional Practice (APP).

We have planned the following projects under the objective in 2016/17:

- **Publish Learning the Lessons bulletins**

We will continue to publish these bulletins, which set out learning from both IPCC investigations and those

undertaken by the police service locally to help drive improvement in police policy, practice and training. Feedback from both police and non-police stakeholders shows that they continue to view the bulletin positively.

Figure 10 – Objective 5: summary of projects for 2016/17.

Ref	Project	Directorate
5.1	Publish Learning the Lessons bulletins.	Strategy and Impact

Outcome measure

Figure 11 – Objective 5: outcome measure and target.

Outcome measure	Target
% of learning recommendations accepted	95%

Strategic objective 6

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

We will be entering the third year of our expansion programme, which is due to end in 2017/18. The IPCC has developed a new 'target operating model' to allow it to deliver this expansion effectively. The model focuses on quality and timeliness, enhancing our focus on meeting the needs of users and stakeholders, and on the improvements our work can deliver to the police complaints system and policing as a whole. Once the target operating model is implemented we will be able to deal more effectively and efficiently with the significant increase in independent investigations we will be carrying out.

Alongside expansion we will be preparing for the implementation of legislative change to the police complaints system and governance changes. In March 2016, the Home Office published a response to its consultation on the future governance structure of the IPCC. The plans outlined will not change the role and remit of the organisation, but will rename the IPCC as the Office for Police Conduct. Our governance structure will change so that we have a single head, called the Director General, and a Board, made up of a majority of non-executive directors. The Board will provide scrutiny and challenge to the Director General's decisions.

As we prepare for the Office for Police Conduct to come into being, our values will remain at the heart of the organisation. We will make sure that all aspects of our Change programme are tested against those values. We are committed to promoting equality and diversity and supporting a culture within which we actively value difference.

We will continue work to improve our processes, how we work with other organisations, our management information, capability and performance. We have previously developed strategies and action plans that we will continue to implement in 16/17 and support expansion. As part of the Estates Strategy we will expand our Sale office in the year and explore options for accommodation in London and the South East as we approach the end of our current lease in High Holborn. Our People and Learning and Development (L&D) strategies will be implemented in line with the overarching change programme and target operating model and deliver changes to the management of our L&D activities which we will be implemented in the year. Our ICT strategy prioritises continuity of business service which, this year, focuses on planning of options as we approach the final years of our main outsourced

ICT contract and implementing early steps of the preferred option. It will also plan to accommodate system changes required by the governance and legislative changes that will become clearer in the early months.

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

What will we do in 2016/17?

The following functions will support the delivery of this objective with the following functional services:

- The ICT function, which includes security and information assurance; supporting the IPCC external website; providing mobile telephony and fixed telecoms and network services; managing outsourced ICT suppliers and associated finances and contracts; managing day-to-day ICT service delivery, support and development; supporting KIM and business intelligence and reporting; and support and maintenance of third party hardware and software.

This function also includes our Freedom of Information and Data Protection team, archive and records management, administration of critical incident and managing the outsourced payroll provider.

- HR function, which includes implementation of projects under the People Strategy; supporting the transition of Hillsborough staff, employee relations advice and support; recruitment advice and support; transactional HR and the provision of HR subject matter advice and expertise to the Change programme and IPCC departments in preparation for future projects.
- Finance function, which includes effective financial support across the IPCC; support to the IPCC's expansion; maintaining controls over the cash, assets and liabilities and establishment; processing transactions efficiently; and demonstrating accountability and compliance to the Audit and Risk Committee, Parliament and Home Office through the annual accounts, regular reports and the control framework.
- Estates and procurement function, which includes supporting the business in all aspects of procurement; making sure best value and compliance is achieved on all IPCC expenditure; assisting and supporting with transactional procurement and financial reconciliations; delivering a facilities service that makes sure our buildings and services are fit for purpose; managing the IPCC's third party supplier contracts; and providing a quality health and safety service to the organisation.

- Communications function which includes news, internal communications, digital and social media and corporate communications; which provides support and advice on all external and communications matters.
- Legal function, which includes providing legal advice and guidance to the Chair, Chief Executive Officer, deputy chairs, commissioners and all operational staff; providing legal advice and guidance on high-profile and complex cases; providing case reports; advising on any matter relating to the legal framework in which the IPCC operates; providing legal advice and guidance in relation to independent and managed IPCC investigations, appeals from supervised and local investigations and assisting with the legal aspects of policy development and legislative change.
- Performance function, which includes performance reporting at a corporate level; and performance framework reporting at police force level.
- Business planning and projects function, which includes strategic and business planning; and providing programme and project support.
- Risk and audit function, which includes supporting the Chief Executive Officer and Audit and Risk Committee assurance processes; managing internal audit assurance; and strategic risk management.

We have planned the following project work under this objective in 2016/17:

- **Implement the people strategy**

We will undertake phased implementation of the People Strategy in line with the overarching change programme and target operating model development to make sure the IPCC is capable of achieving operational targets. The work will include: the development, implementation and evaluation of a prototype learning and development function that will support and facilitate the continuous learning and development, motivation, values and culture of the IPCC workforce; continued updating and refreshing of People IT systems to facilitate easier employee and manager access; working collaboratively with all business areas to ensure workforce planning is timely and effective and reviewing existing attraction and recruitment practices so the IPCC can continue to attract and retain high-calibre applicants that reflect the IPCC service user population. The strands that have been identified are:

- **Recruitment strategy**

This work will revise both the recruitment and attraction strategies to enable us to attract and recruit high-calibre people who reflect our user population and are committed to our aims and values.

- Apprenticeship programme

In line with the requirement to recruit apprentices to 2.3% of the workforce we will develop an apprenticeship programme that will facilitate the development of a cohort of new talent providing greater levels of stability within the lower grades, feeding into middle grade posts in the future.

- Workforce planning

Working with the senior leadership team this project will identify our workforce requirements, developing a robust workforce resourcing plan for implementation across 2016-2018.

- People systems and processes

We will continue the programme of functionality improvement work to the EmpowerMe HR system, facilitating easier employee access to HR functions such as maternity leave. We will also commence feasibility scoping for the development and delivery of a revised HR IT system with improved functionality and accessibility across 2016-2018.

- Learning and development framework

We will deliver a prototype Learning and Development framework model as an element of the HR department. The framework will underpin the implementation of the new IPCC Learning and Development strategy

and associated action plan informed by the learning need analysis (LNA) conducted in late 15/16. The model will be evaluated throughout the prototype phase with an efficacy review taking place in late 16/17 to establish whether the function is fit for purpose. We will also consider a learning needs analysis in line with business planning for 17/18 to inform the learning development requirements.

- Leadership development and talent management

Work on leadership development initiated in 15/16 will be expanded to include a programme of learning and development opportunities designed to feed in to facilitated events for the senior leadership team and management board taking place every quarter. The programme will be based on the Future Engage Deliver methodology targeting a wider audience of IPCC managers building in elements of talent management.

- Induction

We will revise our induction programme to make sure new starters receive an introduction to the IPCC that is informative, relevant and timely. Activity will focus on a redesign of the corporate induction and its supporting functions, the timely provision of all mandatory and essential learning and the development of an IPCC welcome

pack for all new starters. The project will also scope the feasibility of introducing 'refresher sessions' for existing staff.

- **Develop and implement new operations directorate learning and development team structure**

The structure of the operations training team will be reviewed to make sure that the team can support the new operating model for delivering learning and development for the operations directorate. This will include training for new starters, accreditation and continuous professional development.

- **Implement our knowledge and information management (KIM) strategy**

In 2016/17, we will continue to implement our KIM strategy. This will include:

- Developing a knowledge base – this will be a virtual repository of information to help staff across the IPCC share knowledge.
- Defining and implementing an intelligence model – this will create systems and processes to allow us to develop a strategic and tactical assessment to aid decision making on national priorities. It will also help identify trends and themes that we may need to consider in our work.

- Developing a business-wide taxonomy – this will develop a framework of categorisation of information and will help us to search for and share the knowledge we have within the IPCC.

This work will enable us to better utilise the information and knowledge we hold about our work and use it to inform decisions.

- **Implement the IPCC estates strategy**

In 2015/16 we developed a comprehensive estates strategy to guide property decisions in the future and make sure that our operational requirements are met. The strategy covers five years (2015-2020) during which time the majority of leases within the estate are due to expire/break. In 2016/17, work in this area will include:

- Expanding office space in our Sale office in the first half of the year.
- Explore options for accommodation in London and the South East as we approach the end of our current lease in High Holborn, working with our assigned government estates cluster and the Government Property Unit.
- Deliver the accommodation requirements of the next phase of our Hillsborough Investigation in collaboration with Operation Resolve and the Home Office.

- **Deliver phase 2 of outcomes tracker**

A new outcomes tracker allows us to track the outcomes from our operational work, provides better reporting internally of our work and the impacts we have. It also allows us to monitor activity that takes place once we have published our investigation reports, and supports our force oversight staff to follow up recommendations with forces. We implemented the first phase of this work in 2015/16. In 2016/17 we will focus on further implementation steps and extending the tracker to cover appeals.

- **Deliver enhanced disclosure project**

The Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (ROEOA) and the Police Act 1997 (Criminal Records) (PACR) currently list a number of organisations and functions that carry out work involving direct contact with children, young people and vulnerable adults; have access to sensitive information about these groups; and/or perform law enforcement functions. The risks associated with this work rightly mean that staff involved in that kind of work undergo enhanced vetting. The work of the IPCC presents similar risks and subject to the necessary legislative basis being provided, the IPCC will take forward enhanced vetting for relevant staff.

- **Improve finance and procurement controls**

We will be piloting a scheme to develop a no purchase order /no pay policy in order to improve controls over finance and procurement.

- **Complete staff survey**

We will complete a staff survey to seek the views of staff and engage them in a two-way process of communication. This will allow us to gather knowledge about staff concerns and take action to address these.

- **Review implementation of policy on safeguarding children and young people**

In 2015/16 we produced and implemented a policy on safeguarding children and young people. We will review the implementation of this policy. The review will consider whether staff are aware of and understand the policy, whether information has been shared with the police and other agencies, and whether it would be useful to commission an external organisation to undertake a more detailed review of our approach to safeguarding children and young people.

- **Produce and implement a policy on safeguarding vulnerable adults**

During the development of our safeguarding children and young people policy, we considered the appropriateness of the policy covering vulnerable adults. However, we felt that this would not be appropriate as there are different issues to consider and different legal frameworks. Therefore, we will develop and implement a policy on safeguarding vulnerable adults in 2016/17. The policy will set out the action that commissioners and staff should take if they suspect that a vulnerable adult has been harmed, or is at risk of harm.

- **Implement Welsh language standards**

New Welsh language standards under the Welsh Language Measure 2011 will place a duty on organisations, including the IPCC, to make sure that the Welsh language is treated no less favourably than the English language. The IPCC will become subject to these standards in 2016/17 once Welsh ministers have agreed and laid standards through regulations. We expect to know which standards apply to us in 2016/17 and will begin to plan and implement this work.

- **Review our policies against the Public Sector Equality Duty**

We will commence a process of reviewing all our policies to make sure they are in accordance with the Public Sector Equality Duty.

- **Review our equality impact assessment approach**

We will review our approach to equality impact assessments to help us make sure that our proposed or existing policies, strategies, or activities do not discriminate against people with a protected characteristic. This will also ensure we advance equality of opportunity for people with protected characteristics, and promote understanding between people from different groups. We will create a new template, guidance, and deliver training to staff to help them complete the assessments.

- **Develop an equalities performance management framework**

We will develop and implement an equalities performance management framework to assess progress across all areas of our business. A corporate diversity dashboard will also be developed to provide a virtual representation of key performance indicators. The dashboard will enable us to assess our progress in relation to workforce diversity quickly and easily.

- **Revise the memorandum of understanding (MoU) between the IPCC and the Coroners' Society**

IPCC investigations into deaths following police contact involve liaison with coroners, who are often examining the same issues as the IPCC investigation. Therefore, it is important

that the working practices agreed between the IPCC and coroners are helpful and workable for both parties.

Since the current MOU was last reviewed in 2010, there have been legislative changes to the way that coroners conduct inquests. We are currently liaising with the Chief Coroner's Office to revise and update working practices to reflect the change in legislation.

- **Exit and transition from our ICT contract**

A major strand of our ICT strategy 2015-2021 is the planned and managed exit of our prime ICT supplier. This project will involve defining the sequence in which each identified ICT service should be moved or replaced, taking into account the risks to business continuity, the costs, the risks to technical integrity and the complexity of migration. In 2016/17 we will move or replace a defined set of ICT services.

- **Finalising the quality strategy and implementation**

We will finalise our Quality Strategy, outlining our approach to quality and continuous improvement across the organisation. In 2016/17 we will prioritise implementing the quality strategy and further developing quality measures across our operations functions, initially focusing on referral assessments, investigations and appeals.

- **Develop a learning cycle to make sure feedback and learning is fed back into operational policy, guidance, training and practice**

A key element of the target operating model is to make sure that mechanisms for continuous improvement are built into our operational processes. We will define and implement an operations learning cycle that will draw together internal and external feedback, learning and requirements for change relating to our operational policy, guidance, training and practice. We will prioritise, drive and track improvements and assess their impact.

- **Develop a transparency policy with annual reporting on implementation**

The triennial review of the IPCC¹² recommended that we should produce a transparency policy with annual reporting on implementation. This policy will build on and demonstrate our commitment to openness and transparency. Developing a comprehensive transparency policy will bring together the range of activities and policies we currently have in place to promote transparency.

- **Publish information on IPCC performance**

This project will consider how we publish more information about the IPCC performance in an accessible way for public scrutiny. This will include the

¹²Considered the reform of our governance and organisational structure.

progress against our outcome measures and the work we have been delivering to impact on our strategic objectives.

Implement legislative change

We will continue to work with the Home Office on the development of secondary legislation to simplify the complaints and discipline systems. To implement the legislation we will also need to:

- Identify, review and update any corporate strategies affected by legislative change.
- Reflect any changes to our systems and identify any new reporting requirements to monitor our performance.
- Consider and implement any changes to our oversight of the police complaints system and revise our processes to continue meaningful interaction with police forces and PCCs.
- Identify the effect that changes to legislation will have on our Knowledge and Information strategy.
- Consider and consult with staff as appropriate where changes may impact of staff roles and responsibilities.

We will also deliver the following projects to deliver legislative change.

- **Develop our ability to present at disciplinary hearings**

The current legislative change programme is likely to include provisions reinstating the IPCC's ability to present cases at disciplinary hearings. The detail about precisely what type of case and the extent of our discretion to present cases, is still being finalised. This project will prepare the IPCC to be able to present disciplinary cases in accordance with the new regulatory regime consistently across all police forces, including agreeing the factors that will be considered in deciding whether to present or not.

- **Make sure that the IPCC maintains powers included in the Investigatory Powers Bill**

This project involves liaising with the Home Office to seek appropriate inclusion of the IPCC in relevant parts of the Investigatory Powers Bill (communication data and equipment interference).

- **Governance change project**

We will work with the Home Office on how proposals to change the IPCC governance structure will be implemented. This work will scope the resources needed within the IPCC to change the organisation into the Office of Police Conduct, and start the implementation process. This will include rebranding of the IPCC to the Office of Police Conduct.

Figure 12 – Objective 6: summary of projects for 2016/17.

Ref	Project	Directorate
6.1	Implement the People Strategy <ul style="list-style-type: none"> • Recruitment Strategy • Apprenticeship programme • Workforce planning • People systems and processes • Learning and Development framework • Leadership development and talent management • Induction 	Change
6.2	Develop and implement new operations directorate learning and development team structure.	Operations
6.3	Implement our knowledge and information management (KIM) strategy <ul style="list-style-type: none"> • Development of knowledge base • Development of intelligence model • Development of taxonomy 	Strategy and Impact
6.4	Implement the IPCC estates strategy.	Resources
6.5	Deliver phase 2 of outcomes tracker.	Strategy and Impact
6.6	Deliver enhanced disclosure project.	Strategy and Impact
6.7	Improve finance and procurement controls.	Resources
6.8	Complete staff survey.	Strategy and Impact
6.9	Review implementation of policy on safeguarding children and young people.	Strategy and Impact
6.10	Produce and implement a policy on safeguarding vulnerable adults.	Strategy and Impact
6.11	Implement Welsh language standards.	Strategy and Impact
6.12	Review our policies against the Public Sector Equality Duty.	Chief Executive and Commission

Ref	Project	Directorate
6.13	Reviewing our equality impact assessment approach.	Chief Executive and Commission
6.14	Develop an equalities performance management framework.	Chief Executive and Commission
6.15	Development of equalities reporting.	Strategy and Impact
6.16	Revise the memorandum of understanding between the IPCC and the Coroners' Society.	Legal
6.17	Exit and transition from our ICT contract.	Resources
6.18	Finalising the quality strategy and implementation.	Operations
6.19	Develop a learning cycle to make sure feedback and learning is fed back into operational policy, guidance, training and practice.	Operations
6.20	Develop a transparency policy with annual reporting on implementation.	Strategy and Impact
6.21	Publish information on IPCC performance.	Strategy and Impact
6.22	Consider legislation and strategy policy.	Strategy and Impact
6.23	Review and revision of corporate strategies.	Strategy and Impact
6.24	Identify reporting requirements and methods for new legislation.	Strategy and Impact
6.25	Identify changes to process and products from new legislation.	Strategy and Impact
6.26	Develop our ability to present at disciplinary hearings.	Legal
6.27	Make sure that the IPCC maintains powers included in the Investigatory Powers Bill.	Legal
6.28	Identify the effect that changes to legislation will have on our Knowledge and Information strategy.	Strategy and Impact
6.29	Governance change project.	Change

Outcome measure

Figure 13 – Objective 6: outcome measure and target.

Outcome measure	Target
Staff survey engagement score ¹³	61%

¹³If the IPCC is meeting this objective, we would have a highly motivated workforce, with the right skills, training, managerial support, facilities and knowledge to do their jobs effectively. An engagement score is calculated as a weighted average of the responses to five questions around motivation, inspiration and feeling proud to work for the organisation.

3. Funding in 2016/17

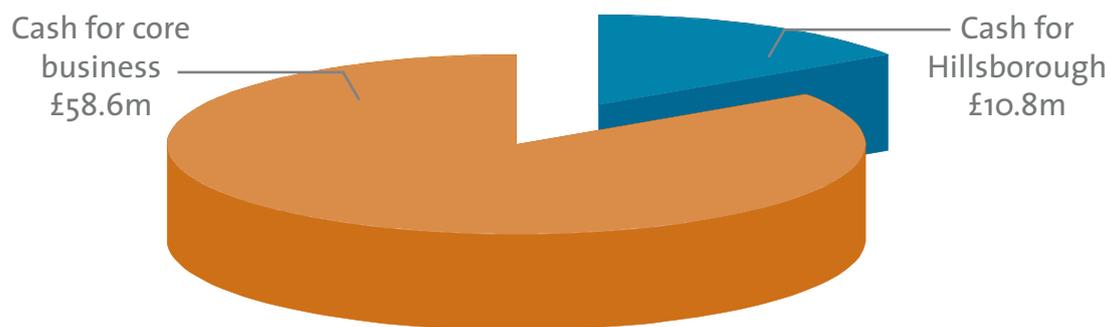


Funding in 2016/17

The IPCC is funded by the Home Office through grant in aid. We receive this through the year in instalments aligned to our expenditure on pay and services. Our Accounting Officer (the Chief Executive) is responsible for making sure that grant in aid is used for the purposes laid out by Parliament. The Home Office has set out detailed terms and conditions in a framework document that strikes an appropriate balance of ensuring prudent management of grant in aid funds; achieving value for money; and assuring funds are used as envisaged.

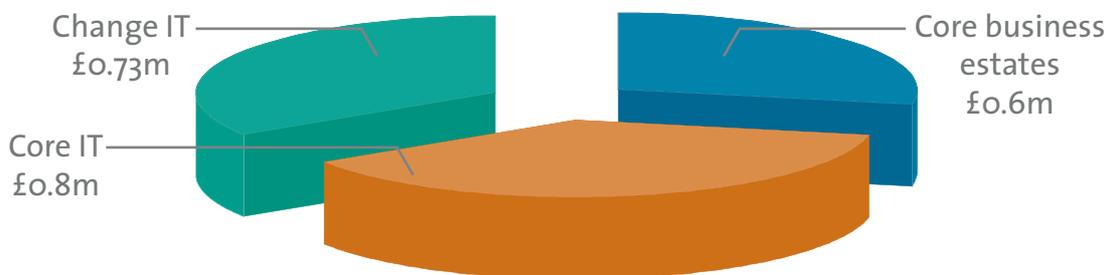
The IPCC will receive grant in aid funding, both capital and resources of £71.5m for 2016/17. This includes funding for our core business, ongoing change and the Hillsborough investigation. The IPCC resource budget for 2016/17 is £69.4m. A breakdown of this budget is included in figure 14.

Figure 14 – Breakdown of IPCC resource budget for 2016/17.



The IPCC capital budget for 2016/17 is £2.13m. A breakdown of this budget is included in figure 15.

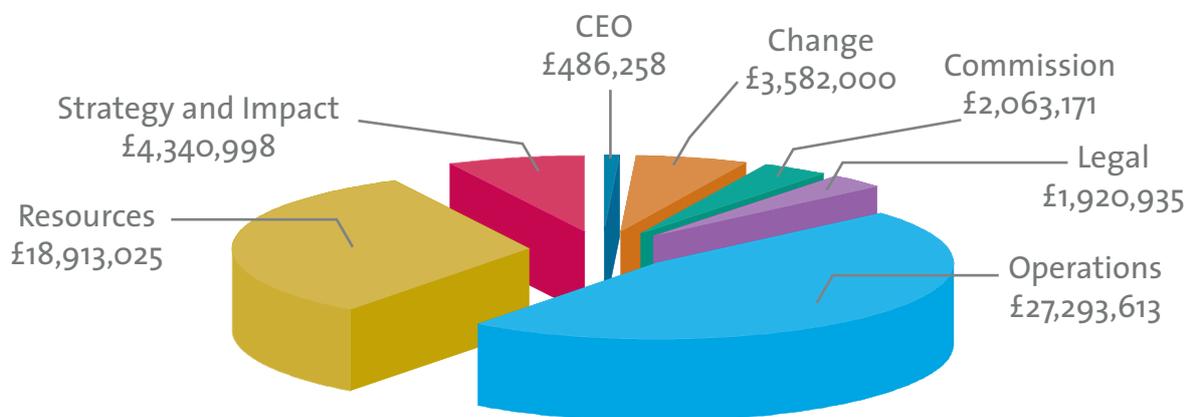
Figure 15 – Breakdown of IPCC capital budget for 2016/17.



The IPCC core business budget for 2016/17 is £58.6m. A breakdown of this budget is included at figure 16. The Directorate budgets include the cost of implementing

the projects in this business plan, as well as other work to deliver and continue to improve our day-to-day activities.

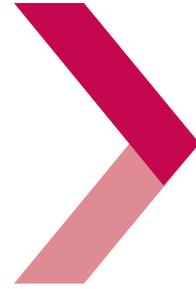
Figure 16 – Breakdown of IPCC core business funding for 2016/17.



The cash budget for the Hillsborough investigation is £10.8m. This will be used to conclude our independent investigation following the Hillsborough inquest and the managed aspects of the Operation Resolve investigation (considering the actions of the police).

Budgets are allocated to Directors against priorities described in the Business Plan. Expenditure plans are regularly reviewed to make sure resources are being used to best effect across the organisation, while also considering resource needs.

4. Performance targets



Performance targets

We forecast annual demand for our services and set performance and management information targets for the timeliness and quality of our work. This lets our service users know what they can expect from us.

Targets and management information for operations takes into account the expected capacity for the year, expected demand, and performance that can be achieved with the resources available.

We have recently developed ways to measure quality in investigations and we will move on to looking at other areas of operational practice such as appeals and MOI. We are continuing to develop mechanisms to receive customer feedback and stakeholders' views on our performance. These will allow us to give a more rounded picture of our performance against our core objectives.

This section sets out the headline outcome measures and targets for each of our strategic objectives.

Figure 18 – IPCC 2016/17 strategic objective targets.

Objective	Outcome	Target
1	% of those with least confidence (young people and those from BME groups) who are likely to make a complaint if they were unhappy about how a police officer behaved towards them	A statistically significant increase¹⁴
2	Number of independent investigations: i. Started ii. Completed within 12 months	600-900 investigations 80%
3	% of investigation and local resolution appeals completed within 35 working days % of non recording, discontinuance, disapplication appeals completed within 25 working days	60% 80%

¹⁴On 64% (young people) and 66% (people from BME communities) reported via the public confidence survey.

Objective	Outcome	Target
4	% appeals upheld	A statistically significant reduction ¹⁵
5	% of learning recommendations accepted	95%
6	Staff survey engagement score ¹⁶	61%

¹⁵Baseline – 41% investigation appeals; 39% non-recording appeals.

¹⁶If the IPCC is meeting this objective, we would have a highly motivated workforce, with the right skills, training, managerial support, facilities and knowledge to do their jobs effectively. An engagement score is calculated as a weighted average of the responses to five questions around motivation, inspiration and feeling proud to work for the organisation.

5. Risks



Risks

As set out in our Corporate Plan, we use a risk management framework that is overseen by the Audit and Risk Committee and the Commission. Significant strategic risks are identified, assessed and then managed through a range of mitigation and risk reduction activities. Quarterly updates are presented on the strategic risks with lower-level risks being managed within directorates, programmes and projects as appropriate. An escalation and de-escalation process is in place to ensure that risks are being managed at the correct level.

Our risk management framework is used at an operational level through directorate, programme, and project risk registers that monitor risks associated with delivering our core business. This framework will be used to recognise and address risks emerging or changing throughout the year that may impact on achieving the deliverables set out in this Business Plan.

The IPCC is implementing a large and complex Change programme to enable the organisation to deliver a greater workload. Combined with legislative and governance change (neither of which are currently fully specified), this creates a significant range of risks for the organisation. In 2016/17 we will need to continually re-assess the scope of work

needed to implement these changes, and their associated resourcing requirements, balancing delivery of these changes with delivery of our core business within this Business Plan.

Levels of demand and capacity to match that demand remain unpredictable. Overall, the number of referrals and the number of investigators has increased, but cases also vary hugely in their scale and complexity – a fatal shooting incident can take place anytime. We are carrying out a large number of child sexual exploitation investigations and, while we liaise closely with the Goddard Inquiry team and Operation Hydrant (which co-ordinates the police response to historic institutional CSE), it is not possible to forecast the likely future demand accurately. This is one reason we continue to set targets for the number of independent investigations that we will take on based on a range. This year we also intend to develop our management information and reporting to highlight the range of sizes of investigations.

If there was a complex incident with multiple scenes and organisations involved, for example a terrorist incident, this would affect our ability to deliver our other work. A fatal shooting may itself require diversion of resources from other investigations due to the urgency of the

situation. We have participated in a terror threat exercise in London in 2015 to make sure we have considered the implications to the business if an incident of this nature was to happen.

We will continue to liaise with Home Office officials who are working on changes to the complaints and discipline systems to provide our view on the likely impact of each change on system complexity, efficiency and effectiveness. We want to make sure that the outcomes that are available for complainants contribute to confidence in the complaints system. We will continue to assess any impact on our operations and funding requirements arising from the reform of the complaints and discipline systems, and our governance changes.

We also need to make sure that we are not constrained from fully utilising all the resources that are apparently available to us. Future reductions in our funding could lead to a reduction in the work we can deliver. Unavoidable new costs, without matched funding, could mean we would need to implement cuts to our normal work. We also need to ensure that external approvals that may be needed do not restrict or delay our ability to deliver our investigations and core support services. We have worked closely with Home Office officials to ensure external approvals do not adversely affect the future delivery of our business.

If our work fails to produce high-quality, timely outcomes with a focus on high-quality customer service, this could have an impact on confidence of stakeholders and the public and damage the reputation of our organisation. We will make sure that we implement our Quality Strategy in 16/17 across all our operational work so that quality can be measured and learning is fed back into training, guidance and delivery.



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