

Annex C: Action plan

Ref	ACTIONS	OWNER	TIMETABLE
Independence			
1	We are revising our conflict of interest policy for all staff and commissioners, and are strengthening the initial training on conflicts of interest that is provided to all staff.	Amanda Kelly	Jul -14
2	As we expand, we will ensure that there are specific restrictions on investigators leading an investigation into a force where they have previously worked.	Moir Stewart	Dec -14
3	We are already planning to expand our training programme for all staff, to include training on identifying and challenging personal bias.	Colin Woodward	Mar -15
Scope and remit			
4	We will consider any relevant interaction between the police and other agencies in our investigations into deaths. If the actions of other organisations are relevant, but beyond our own remit, we will inform the coroner and other agencies or oversight bodies where appropriate.	Moir Stewart	In place
5	We have asked for additional powers in relation to private sector contractors carrying out policing functions, to ensure that we are able to investigate complaints and conduct matters associated with them. These powers are included in the Anti-Social Behaviour, Crime and Policing Bill, which is currently before Parliament.	Sadie East	Oct- 14
Initial steps in assessment and investigation			
<i>Referral and mode of investigation decision-making</i>			
6	Chief Constables have been reminded of their duty to refer deaths immediately. We will address any delays in referral as part of our investigation and final report. We will consider whether this raises issues of misconduct.	Moir Stewart	In place
7	We have set up a dedicated team to deal with referrals to address concerns about consistency, timeliness and transparency of decision making. We will use the learning and experience from this work to develop a dedicated assessment function as part of our new organisational structure.	Moir Stewart	Jul -14
8	We will publish the criteria that we consider when we make a decision about how a case should be investigated.	Moir Stewart	Sep -14
9	Decisions about whether to investigate independently will include consideration of whether discrimination (for example because of race, mental health, gender, disability, sexual orientation) may be a relevant factor in the death.	Moir Stewart	In place
10	With more resources, we will be able to do more independent investigations, for example where a death has been narrowly avoided.	Moir Stewart	Mar -15

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Post-incident management		
11 We have developed draft statutory guidance under Section 22 of the Police Reform Act in relation to achieving best evidence in death and serious injury investigations. This sets out our expectations of the actions the police should take to identify all potentially relevant evidence and preserve the integrity of that evidence. The draft guidance also specifies that key policing witnesses should be separated before providing their initial accounts and should not confer.	Moir Stewart	Consultation starts in Mar -14
12 Investigators have received further training and guidance on scene management to ensure that they have the skills and confidence to take control of a scene, both remotely and on arrival, and to give and record guidance to police and contracted forensic providers.	Moir Stewart	Complete
13 Additional resources will allow us to open more offices and increase our geographic coverage.	Kevin Woodrow	Dec -14
14 As part of our change programme and our work on the development of a new operational model, we will review our on-call system, and consider how best to obtain specialised scene of crime expertise.	Megan Smart	Apr -15
15 We will explore with the Association of Chief Police Officers (ACPO) the feasibility of filming the process of scene preservation to ensure that evidence is secured and public confidence is maintained.	Moir Stewart	Oct -14
Conducting the investigation		
16 We will develop the standard use of investigations plans in our investigation.	Moir Stewart	Apr -14
17 Staff have received additional training on the threshold for making decisions on criminality or misconduct, and on other matters relating to the use of our powers.	Moir Stewart	Complete
18 We delivered additional training for investigators in carrying out probing interviews, focusing on the lessons learned from Dr Casale's review. We also now transcribe all significant police witness interviews.	Moir Stewart	Complete
19 We have expanded the use of multi-disciplinary working, and issued new guidance on the role of the commissioner, to ensure robust internal challenge and analysis of evidence.	Moir Stewart	In place
20 We have proposed to the College of Policing that cooperating fully with investigations should be part of the proposed code of ethics for police officers and staff.	Sadie East	Complete
21 We are using our power to require officers to attend witness interviews as soon as possible after the incident. If we do not get effective cooperation, we will initially raise this with forces, and will consider whether further action or powers are needed.	Moir Stewart	In place

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22 We will exercise powers under the Anti-Social Behaviour, Crime and Policing Bill, when it becomes law, to obtain information from non-police individuals and organisations.	Moir Stewart	Oct -14
23 We will revise our guidance to police on dealing with discrimination allegations.	Sadie East	March -15
24 Ensure that terms of reference actively consider discrimination issues.	Moir Stewart	In place
25 We are providing ongoing training to our staff on dealing with issues of discrimination.	Moir Stewart	In place
26 We will reflect the actions and principles in this report and Dr Casale's review in our new operational model. The new model will make our structures and processes more flexible and support timeliness and quality assurance. This will include external review.	Megan Smart	Dec -14
27 Once the new operational model is in place we will publish a revised operations manual so that our practices can be understood and scrutinised.	Moir Stewart	Apr -17
28 As part of our new operating model, we will ensure that we effectively use specialist expertise, both internally and through external support in areas such as forensics, mental health and discrimination.	Megan Smart	Apr -15
29 As we gain more resources, we will have more investigators, greater flexibility and expertise. We will create a specialist assessment function, and a single operational directorate.	Megan Smart	Dec -14
30 We will monitor and report on the impact of our power to compel officers to attend witness interviews, including any refusal to answer questions at interview rather than later in writing. We will raise this with chief officers and police and crime commissioners, and refer to it in our reports and public statements.	Moir Stewart	In place
31 We will review our guidance for investigators on pre-interview disclosure to ensure it reflects the findings of this review and supports the collection of best evidence.	Moir Stewart/ Sadie East	Apr -15
32 We are taking steps to increase our own knowledge and awareness about current mental health issues, and will review staff training in mental health awareness, incorporating service user experiences.	Moir Stewart	In place

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Engagement during investigations		
<i>Engaging with families</i>		
33 We are providing training on bereavement awareness and the stages of grief to all investigators and commissioners. Performance reviews for investigations staff will include assessments of their work with families.	Moir Stewart	May -14
34 As part of expansion, we will develop a new model for family liaison, drawing on the feedback from this review. This will be informed by a victim support approach.	Megan Smart	Apr -15
35 We have revised the initial information we provide to families and the letters they receive. We are developing a more detailed information pack to supplement this.	Sadie East	Sep -14
36 All families will have the opportunity to meet IPCC staff and commissioners at the beginning and throughout the investigation. They can ask questions and voice any concerns about the investigation's progress or approach.	Moir Stewart	In place
37 We will involve families in developing the terms of reference for the investigation so that they include the questions that the family wants us to try to answer.	Moir Stewart	In place
38 All press statements will be agreed, wherever possible, with families.	Charlotte Phillips	In place
39 We keep families updated on the progress of the investigation, disclosing all information, subject only to the 'harm test'.	Moir Stewart	In place
40 As we develop investigation plans, we will share them with the family. We will also explore providing them with draft reports.	Moir Stewart	Apr -14
41 We are carrying out a review of all our methods for seeking feedback. This will include how we seek regular feedback from families and their representatives to improve our work with families.	Kathie Cashell	Aug -14
<i>Engaging with the police force, police officers and staff</i>		
42 We will share advance copies of press releases with the press office of the police force involved in our investigation , wherever possible, to ensure factual accuracy.	Charlotte Phillips	In place
43 As part of the review of our operations manual for investigations we will ensure that investigators are provided with clearer guidance about updating police forces, police officers and staff throughout the investigation.	Moir Stewart	Mar -14
44 We are carrying out a full review of all our methods for seeking feedback. This will include consideration about how best to gather and learn from feedback provided by officers and staff involved in our investigations.	Kathie Cashell	Aug -14

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Engaging with communities and the public through the media		
45 We will seek to develop better links with people and organisations who work in the community, including groups that have low levels of trust in the police and the complaints system. We will use these links to help identify appropriate representatives for involvement in individual investigations (e.g. through community reference groups).	David Knight	Sep -14
46 We will explore greater use of social media such as Twitter. This allows us to communicate directly to the public in dynamic and fast moving cases and to correct or clarify misleading coverage promptly and robustly.	Sadie East / Charlotte Phillips	In place
47 As we grow and develop, we will review all of our communications strategy, to help us ensure that we can communicate our work, role and outcomes more effectively.	Sadie East / Charlotte Phillips	Mar -15
Reporting, outcomes and learning		
Investigation reports		
48 We will implement a new report writing framework and guidance designed to focus investigation reports on the key themes and questions to be answered under the terms of reference. There will be a specific framework for Article 2 investigations. All investigators will receive guidance and training to support them in using the framework.	Moir Stewart	Apr -14
49 As part of our change programme, we will consider creating an enhanced editorial function to ensure our reports are clearly written.	Megan Smart	Mar -15
50 A multi-disciplinary approach, involving commissioners, lawyers and the lead investigator, will ensure that there is effective analysis of the evidence to support robust conclusions.	Moir Stewart	In place
51 We will highlight any areas where we have been unable to gather or test evidence (including non-cooperation from witnesses and issues/failures that relate to other agencies outside our remit) so that these can be tested in further proceedings, such as inquests.	Moir Stewart	In place
Outcomes		
52 We will publish the outcomes of our investigations, clarifying our own outcomes and those that result from disciplinary or criminal processes.	Kathie Cashell	From May -14
53 We have responded to the Home Office consultation on improving the police disciplinary system and making it more transparent and will continue to make the case for reform.	David Knight	Ongoing
54 We will continue to work with the CPS to ensure we work more effectively to minimise delays. We will consider whether the memorandum of understanding between the two organisations needs revising to reflect any new practice.	Sadie East	Jun -14

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55	In our new operating model, we will develop a specialist investigations support function, including staff who specifically liaise with coroners (and other relevant bodies) to ensure full and timely disclosure.	Megan Smart	Dec -14
56	We will also consider whether our memorandum of understanding with the Coroners' Society needs revising to reflect recent developments in legislation and the findings of this review and to clarify our role in inquests.	Sadie East/ David Emery	Mar -15
<i>Learning and improving police practice</i>			
57	Chief officers will be required to respond formally to our recommendations when the Anti-Social Behaviour, Crime and Policing Bill becomes law. We will put systems in place to ensure that we make best use of this new power and will liaise with police and crime commissioners to ensure that they are aware of our recommendations and the chief officer's response.	Sadie East	Oct -14
58	As part of the change programme, we will develop systems and support and train staff to ensure that recommendations are consistent and informed by best practice and related recommendations made by us or others. This will be supported by improved knowledge management systems.	David Knight/ Megan Smart	Mar -15
59	We are developing an agreement with Her Majesty's Inspectorate of Constabulary and the College of Policing to ensure effective links between our recommendations and standard-setting and inspection.	Sadie East	Apr -14
60	We will carry out thematic work: in 2014/15 on use of force, including the use of restraint and lethal force by the police.	Kathie Cashell	Mar-15
61	If we consider that insufficient action has been taken in response to our recommendations, we will report this to police and crime commissioners and make our views known to ministers and the public.	David Knight	From Oct -14

List of owners

Amanda Kelly	<i>Acting Chief Executive</i>
David Knight	<i>Director of Casework and Customer Service</i>
Kevin Woodrow	<i>Director of Resources</i>
Megan Smart	<i>Director of Change</i>
Moir Stewart	<i>Director of Investigations</i>
Charlotte Phillips	<i>Head of News</i>
Colin Woodward	<i>Head of HR</i>
David Emery	<i>Head of Legal</i>
Kathie Cashell	<i>Head of Analytical Services</i>
Sadie East	<i>Head of Strategy and Communications</i>