

ETAP Follow up on the Review of Staffordshire Police Complaints Process

Introduction

On 1 February 2020 regulations placed explicit responsibilities on the Police and Crime Commissioners to adopt a range of procedures in relation to Police Complaints.

The new Police Complaints Process set up for the first time a country wide approach to dealing with complaints. Staffordshire adopted Model 1 of the new process.

In this follow up, carried out on 21 June 2022, affirmation was sought, as well as evidence and progress made, in relation to the 9 questions and responses within the original report.

The initial review of the Police Complaints Process was completed in September 2021 with a commitment to revisit the service in June 2022. In the intervening period much improvement and re-organising of the service has taken place aimed at improving the service for users and providing a streamlined approach to dealing with complaints.

The service has commented; "I am pleased that ETAP have recognised the work we are implementing to make the Police complaints system more accessible, inclusive and effective for the People of Staffordshire. We are working hard to ensure identified, individual and organisational learning recommendations are robustly followed to demonstrate continuous improvement. A new structure and the new Prevent role will support this service improvement ethos and ensure we have effective processes in place to offer the best opportunities for colleagues within Staffordshire to learn and improve moving forward"

What questions did we have?

In the original report we had the following questions :

1. Resilience with regard to systems and succession planning appear to be an issue. How are these risks being managed? Are there any plans in place to improve the situation?
2. It is not clear whether dissemination of learning throughout the force is effective. Could senior officers report learning outcomes back to the complaints officer?
3. Hard to reach groups and people not using modern technology may be marginalised when trying to complain about an issue. The force must ensure such groups and individuals are aware of the complaints process and how to access it. Can evidence be produced to show the efforts made to ensure the complaints process is inclusive and open to all?

4. Better recording of incidents, use of body cameras could benefit the process. What steps are management taking to assist the process through better recording of incidents?
5. Increased publication of data in relation to complaints would increase transparency and public confidence. When is it intended to increase communication in this manner?
6. Can we have regular updates on the complaints process in the form of a presentation on an annual basis?
7. Can we from time to time conduct spot checks on a selection of files to reassure compliance with legal requirements continues?
8. An effective IT system is critical to the efficient and effective operation of the complaints process. An ineffective system would adversely affect the complaints process. What is the management response to resolve issues of system continuity failures and delays?
9. The operation of the process is susceptible to single person dependency regarding the review process. What action does management plan to do take to ensure risk in this area is minimised?

What did we find?

1. Resilience with regard to systems and succession planning appear to be an issue. How are these risks being managed? Are there any plans in place to improve the situation?

2.

It was demonstrated that Centurion was now on a new secure platform and the risk of it 'falling over' is now minimal. Therefore, the increase in confidence is significant, as demonstrated below.

Major Incident / Critical Fall Over

In the last year of Boeing 153

In the first year back in house 55

In the last 6 months 1

Centurion also had a recent Health check by FIS (who manage the system), once the report is received we ETAP will receive a copy, together with the plan to implement any recommendations.

Centurion is now the software used in the complaints process removing the use of any other software in the complaints process. This has added

resilience and security to the system as well as providing consistent reporting mechanisms. Staff have been trained in its use.

DI Ward has worked tirelessly developing the service in the last 9 months. At a CPD event held at Stone on 16 June 2022 he delivered a presentation highlighting the new structure within the service which includes a rolling 12 month plan, regular meetings, robust succession planning and a project operating model. There are also 3 dedicated members of staff to Triage all contact regarding complaints of which many can and will be resolved at that contact point.

Sancus now provide additional support to the Compliance Manager which has minimised the single person dependency risk which existed at the time of the original review. Sancus are well established and currently perform this function in varying capacities for about 15 other PCCs. This offers greater resilience to the role.

3. It is not clear whether dissemination of learning throughout the force is effective. Could senior officers report learning outcomes back to the complaints officer?

There has been substantial improvement in this area. Now recommendations made either on the initial complaint or review go to the Complaints and Misconduct Manager, Wesley Jones. In addition there is now the Integrated Inspection Board chaired by ACC Bibby, where organisational and individual learning is discussed and dissemination agreed. There is now loop back to the Compliance Manager to advise how complaint outcomes have been addressed and what learning has been agreed.

There is also a new Prevent role which has been taken up by John Harrison. This will bring added value to the service provided and the staff involved. It was agreed that we examine the contribution of this role when we next do a review in June 2023.

Following the CPD event one of the presenters, Dr Alexandra Kent, is to be asked to come in and review some of the calls made to Triage and provide advice to staff on how to manage 'difficult conversations'

4. Hard to reach groups and people not using modern technology may be marginalised when trying to complain about an issue. The force must ensure such groups and individuals are aware of the complaints process and how to access it. Can evidence be produced to show the efforts made to ensure the complaints process is inclusive and open to all?

There has been a great deal of progress made in this area and it continues to develop,

<https://www.staffordshire.police.uk/advice/advice-and-information/c/af/complaints/what-is-a-complaint/>

There is now a process on how to make a complaint if you are deaf. The above link takes you to the Complaints page of the police website and there is a video to assist the deaf.

There are leaflets in custody suites and in public libraries.

Leaflets on the Complaints Process are given to persons on release from custody.

There is a single online complaint form used by all 43 forces.

Neighbourhood Officers are receiving training on how to assist the public to make and complaint and how to deal with complaints.

Work is being done with Stafford University to see if the complaint form can be adapted for different languages i.e. click on a country flag and google will translate the form accordingly.

At the same CPD event Inspector Luke Coulson, presented slides on Diversity and Inclusion, this provided the team with material to go forward particularly in relation to how the organisation will adapt to different circumstances that come up predominantly within the LGBTQAI+ community.

5. Better recording of incidents, use of body cameras could benefit the process. What steps are management taking to assist the process through better recording of incidents?

The Compliance Manager has seen a marked improvement around use of Body Worn Video. The use of BWV has been given added focus through PSD. Examples of good practice have shared organisationally. There is now a BWV User Group and the Compliance Manager has provided the group with positive feedback on recent footage. Use of BWV can be improved but it is clear the increased use has been of assistance when dealing with complaints.

6. Increased publication of data in relation to complaints would increase transparency and public confidence. When is it intended to increase communication in this manner?

Information is published on the PFCC website re: SIO that links to the IOPC. Complaints are now discussed at SGB (Strategic Governance Board) and at the PPM (Public Performance Meeting). As indicated at point 3

there has been increased promotion of the complaints process, there is more transparency. The Police Conduct Hearings are open to the public to attend and the outcome from the hearings published (unless the matter is sensitive).

7. Can we have regular updates on the complaints process in the form of a presentation on an annual basis?

It has been agreed that the Compliance Manager and the Superintendent will provide annual presentations to ETAP in December each year on progress of complaints.

7. Can we from time to time conduct spot checks on a selection of files to reassure compliance with legal requirements continues?

It was agreed that reviews are both beneficial for the team, important for development and fulfil a monitoring role. In June 2023 it is provisionally planned to conduct another review and at that time look at the operational process in Centurion and examine the contribution made by the Prevent role to the service.

8. An effective IT system is critical to the efficient and effective operation of the complaints process. An ineffective system would adversely affect the complaints process. What is the management response to resolve issues of system continuity failures and delays?

This point has been substantially addressed as can be seen in the response to the earlier points.

9. The operation of the process is susceptible to single person dependency regarding the review process. What action does management plan to do take to ensure risk in this area is minimised?

Again, this point has been substantially addressed as can be seen in the response to the earlier points.

Date for further review/checking on completion

It has been agreed with the service providers that ETAP visit the offices on an annual basis. The next visit has been scheduled for June 2023 and will include examination of the Centurion system which by that time will be fully operational, containing all aspects of complaints

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