



Meeting	Complaints and Conduct Committee
Date	14 November 2024
Location	Webex
Title of Paper	PIRC 6-Stage Process Audit Action & Improvement Plan
Presented By	Superintendent Kate Stephen, Professional Standards Department
Recommendation to Members	For Noting/Discussion
Appendix Attached	No

PURPOSE

The purpose of this report is to provide members of the SPA Complaints and Conduct committee with an Operation Glade update and interim update on the PIRC Audit Report of Police Scotland on the Six Stage Complaint Handling Process. All recommendations are in progress, with several at an advanced stage.

Members are *invited to note and discuss* the contents of the paper.

1. BACKGROUND

- 1.1 In July 2024 PIRC published their report of the audit of Police Scotland's six stage complaint handling process. The PIRC audit resulted in 10 recommendations and an update on each is provided at section 2 within this paper.
- 1.2 Operation GLADE was commenced in April 2024 as a mechanism to facilitate key discussions, co-ordinate improvements to drive down PSD backlog and enhance long term PSD complaint service delivery. A high-level update in respect of improvement activity ongoing is provided at section 3.

2. PIRC AUDIT RECOMMENDATIONS UPDATE

- 2.1 **Recommendation 1** – Police Scotland should review the accessibility of the complaints system for members of the public whose first language is not English.

After a positive meeting between PSD and the Channel Development Lead within Corporate Communications an ICT request has been submitted to update the 'Contact Us' and 'Complaints' tabs on the Police Scotland website with instructions on how to access and navigate these sites in the user's preferred language. This request is pending approval.

- 2.2 **Recommendation 2** – Police Scotland should review the existing online complaint form, with a view to introducing more options in relation to recording gender.

At present the functionality on Centurion Version 4 and the associated DPIA does not support the recording of more options in relation to gender. Work is actively ongoing to develop the existing online complaint form, Centurion Version 8 and an updated DPIA which will enable the introduction of more recording options in relation to gender.

- 2.3 **Recommendation 3** – Police Scotland should revise the initial complaint investigation acknowledgement letter and include an explanation on next steps as the complaint passes through the complaint process, when complainers should expect to be contacted, and estimated timescales.

An initial draft letter is at an advanced stage. Once complete, a period of internal consultation will be required. Discussions remain ongoing in relation to estimated timescales.

- 2.4 **Recommendation 4** – Police Scotland should enhance the existing six stage form to prompt NCARU to secure perishable evidence at the earliest opportunity.

A draft of a revised six stage form, which includes the prompt to secure perishable evidence, has been circulated for internal consultation. The next phase will be ICT testing prior to going live.

- 2.5 **Recommendation 5** – Police Scotland should consider separating the complainer contact and the enquiry log into two distinct logs that require to be updated by EOs.

The draft revised six stage form has separated the complainer contact and enquiry log. As outlined in the previous recommendation a period of consultation is underway prior to ICT testing and going live.

- 2.6 **Recommendation 6** – Police Scotland should develop supporting guidance to accompany the new six-stage form that is being developed by PSD.

Supporting guidance is currently being drafted with a recognition that there is a dependency on the revised six stage form that is subject of consultation and testing.

- 2.7 **Recommendation 7** – Police Scotland should revise their guidance to provide greater clarity on the processes for dealing with complaints involving a mix of criminal and non-criminal complaints.

A complaint determination code of 'pending – criminal proceedings' has been created on the Centurion test site. A template letter has been created to advise the complainer that the complaint has been recorded but will not be progressed until the conclusion of criminal proceedings, and, at that time, if they wish to pursue the non-criminal complaints, they should re-contact PSD to request that it is progressed. Guidance to support this recommendation is in draft format and will be part of the consultation phase previously referred to.

- 2.8 **Recommendation 8** - Police Scotland should conduct a performance data review taking account of the increased demand and the existing resource to establish an evidence-based proposal around new timescale KPI's for dealing with different types of complaints.

An internal meeting took place with the PSD analyst to understand what metrics are required to be measured throughout the six-stage process. It is suggested that consideration of establishing a baseline for the time taken to investigate the recently implemented complaint categories is required to provide meaningful KPIs. Centurion Version 8 is in the early testing phase. Part of this testing includes additional functionality to record times at various stages during the complaint process. This will require full testing to ensure it meets the needs of the Scottish process. Further discussions are planned.

- 2.9 **Recommendation 9** – Police Scotland should revise the guidance on the identification, recording and dissemination of learning, including the use of positive terminology that aligns with the culture of learning. The complaint disposal codes should be amended to include categories where upheld complaints lead to improvement action or individual/organisational learning.

An internal review of current processes of identifying, recording and disseminating learning has taken place which has highlighted areas for improvement. The revised complaint handling form will contain tabs to record where individual and organisational learning has been identified. A separate form is being created to ensure there is an auditable trail for the dissemination of learning from PSD, with a focus on confirmation from the relevant Division that this has been implemented. Positive terminology that supports a culture of learning will be included within the narrative of the form and associated guidance. Discussions are ongoing regarding complaint disposal codes.

- 2.10 **Recommendation 10** – Police Scotland should strengthen the current guidance on the QA process and seek to ensure that all complaint files contain an auditable trail of QA by a senior officer.

Development of the revised complaint handling form seeks to incorporate a tab confirming that QA has been completed by a senior officer. A list of mandatory actions and guidance is being drafted to support this.

A meeting between PSD and PIRC is scheduled for 20 November 2024 to provide assurance and evidence of the work undertaken to enable next steps towards potential implementation of several recommendations.

3. OPERATION GLADE UPDATE

3.1 The volume and demand of Non-Criminal Complaints continues to increase with the current backlog of unallocated Complaints at 1049. These can be broken down as follows – Cat A+ (5), Cat A (311), Cat B (610) and Cat C (123).

3.2 Several positive steps have already been taken to improve the organisations handling of Complaint and Conduct matters and a full Improvement Action Plan is in place to record and drive continuous improvement across multiple areas. This is monitored and tracked via regular Operation Glade Gold Group meetings.

3.3 The following outlines some further action taken to improve the handling of non-criminal complaints since the introduction of the National Model implementation in 2021.

3.3.1 Departmental Restructure

On 1 May 2023 PSD restructured regional Investigation teams, creating a national Complaint Investigations Model with clear leadership for all non-criminal matters and criminal matters, removing geographic areas of responsibility. This model offers greater consistency, sharing of good practice, ability to flex resources to meet changing regional demand and streamlining processes to achieve further efficiencies.

3.3.2 Robust Governance Structure

As part of the above departmental restructuring, we have introduced weekly management meetings with Inspectors and a monthly tactical meeting, empowering the wider team to contribute thoughts and ideas for improvement. This is further supported by the bimonthly Complaint Handling Working Group, a quarterly multi agency National Complaint Handling Development Group and more recently the introduction of Operation Glade – a Gold Group chaired by ACC P&A which will provide a mechanism to facilitate key discussions, co-ordinate improvements to drive down PSD backlog and enhance long term PSD complaint service delivery.

3.3.3 **Benchmarking**

Continual benchmarking has been undertaken with other UK Police Forces, the IOPC, PONI, SPSO and other public bodies to identify best practice in relation to complaint handling practices, including the examination of resource v demand. Several innovative ideas have been identified which improve the efficiency of Police Scotland's Complaint Handling processes. These have been implemented on a smaller scale and their effectiveness is subject of scrutiny and evaluation through the existing governance structures.

Recognising the very similar challenges experienced within SPSO particularly, engagement is ongoing with plans afoot to schedule a workshop in December to work through measures they undertook and lessons learned by them throughout their journey.

3.3.4 **Additional Resource – Task Force**

The Task Force was conceptualised in November 2023 as part of efforts to reduce the growing complaints backlog and went live in December 2023. The premise was to secure additional staff from Local Policing and Specialist Divisions temporarily to support non-criminal team and NCARU for periods between 3 to 6 months. Identified as a development opportunity a combination of 9 x PS/PC were initially offered as part of the initiative from Local Policing and Specialist Divisions. This resource has fluctuated however and recently increased to 11 x PS/PC, who have been allocated Cat B complaints. Training is provided and a mentoring system installed to ensure maximum support to incoming staff.

3.3.5 **Revenue Investment Group (RIG) Bid – Civilian Investigators**

The Operation Glade Gold Group submitted a RIG bid to recruit and deploy additional resources to address backlogs relating to complaints about the police and enhance long term PSD complaint service delivery.

In June 2024 this bid was approved for an uplift of 26 civilian investigators to be deployed within PSD to support efforts to reduce the backlog of unallocated non-criminal complaints.

Initial recruitment has secured 20 civilian investigators subject to offers of employment being accepted and vetting, it is anticipated this first tranche of staff will commence employment in December.

A further advert has been published to fill the remaining 6 posts.

3.3.6 Overtime Contingency Fund Bid

Due to the increase in demand a bid to secure 1350 hours overtime was approved in June 2024. This was targeted at all categories of non-criminal complaints with 200 complaints being concluded.

Recently a further bid for 1750 hours overtime has been submitted for consideration and if approved it will be utilised for the remainder of this financial year.

3.3.7 Revised Complaint Capture Form

As a result of the benchmarking undertaken it was identified that improvements could be made to the existing Police Scotland Complaint Capture Form.

The revised form will focus on the complainer's allegations, evidence, experiences and expectations to allow for their submission to adequately and accurately reflect their complaint. It is anticipated that this will improve the public user experience, allow for clearer identification of complaints, speed up the process and manage public expectation more effectively.

3.3.8 Improvements to Police Scotland Public Facing Complaint Webpage

To enhance the user experience and redirect the number of non-PSD related enquiries being submitted through the Complaint Capture Form relevant information, guidance and signposting is contained within the website to allow members of the public to either navigate the CAP process or alternatively direct their query to the correct Police Scotland business area. It is anticipated that this will create capacity within PSD.

Very early indications demonstrate that the revised form outlined above along with the improvements to the website has helped to slightly reduce non-related PSD matters coming in via those means, thus slightly reducing the unnecessary demand.

3.3.9 Thematic Complaint Lead (Pilot)

Dedicated Investigating Officers take ownership of most common themes of complaints to reduce time taken to investigate due to commonality and improve response time to complainers. Themes identified are Excessive Force, Discrimination and Custody issues. This process will ensure that the dedicated SPOC can identify common learning points and best practice, ensuring this is shared.

Early indications are that the average time to investigate and respond to these types of complaints has reduced.

3.3.10 Engagement Sessions

Regular engagement sessions, targeted at PS/PI in Local and Specialist Policing Divisions, remain ongoing with the purpose of increasing confidence to, where applicable, resolve complaints out with PSD and to communicate common themes trends and learning arising from complaints.

3.4 The above is provided as a snapshot of the activity underway to address the challenges faced within the department and in particular in relation to the demand and backlog of unallocated Non-Criminal Complaints.

4. FINANCIAL IMPLICATIONS

4.1 There are no financial implications in this report.

5. PERSONNEL IMPLICATIONS

5.1 There are no personnel implications in this report.

6. LEGAL IMPLICATIONS

6.1 There are no legal implications in this report.

7. REPUTATIONAL IMPLICATIONS

7.1 There are reputational implications in this report due to the current backlog of unallocated complaints.

8. SOCIAL IMPLICATIONS

8.1 There are no social implications in this report.

9. COMMUNITY IMPACT

9.1 There are no community implications in this report.

10. EQUALITIES IMPLICATIONS

10.1 There are no equality implications in this report.

11. ENVIRONMENT IMPLICATIONS

11.1 There are no environmental implications in this report.

RECOMMENDATIONS

Members are invited to note and discuss the contents of the paper.