



<b>Meeting</b>	<b>Complaints and Conduct Committee</b>
<b>Date</b>	<b>27 February 2025</b>
<b>Location</b>	<b>Online</b>
<b>Title of Paper</b>	<b>SPA/PIRC Joint Audit (Triage) – Recommendations Progress Update</b>
<b>Presented By</b>	<b>Assistant Chief Constable Stuart Houston</b>
<b>Recommendation to Members</b>	<b>For Discussion</b>
<b>Appendix Attached</b>	<b>No</b>

**PURPOSE**

To provide an update on the PIRC Audit Report of Police Scotland on the Triage of Complaints and closure of the eight recommendations contained therein.

## 1. BACKGROUND / INFORMATION

- 1.1 The Dame Elish Angiolini Report, published in November 2020, recommended regular audits of Police Scotland's complaint handling procedures to ensure best practice and ongoing improvement.
- 1.2 The Police Investigations and Review Commissioner PIRC and the Scottish Police Authority (SPA) have statutory responsibility for ensuring that Police Scotland has efficient, effective and suitable complaint handling procedures to deal with complaints from members of the public. It was, therefore, agreed that PIRC and the SPA, would carry out a joint audit. This enabled both organisations to fulfil their statutory duty, whilst avoiding duplication of effort.
- 1.3 In March 2023, the audit report in relation to the triage of Complaints About the Police (CAP) was published with eight recommendations. The audit took place between February 2021 and July 2021, with the intention of capturing how Police Scotland triaged CAP's in the three months prior to the implementation of the National Complaint Handling Model (NCHM) and the three months after.
- 1.4 In December 2024 Police Scotland presented a briefing paper and evidence to both the PIRC and the SPA for consideration of closure of the eight recommendations.
- 1.5 The PIRC responded 13 December 2024 confirming *'I note that there will be some additional revisions of the CAP SOP and CHF in due course but given your reassurance in this regard, I am content to adopt the approach as proposed in the briefing paper for the eight recommendations.'*
- 1.6 A number of recommendations are closely linked to the Police Scotland CAP SOP which is currently under review. Both the PIRC and SPA will be engaged in the consultation process as mandatory consultees.

## 2. RECOMMENDATIONS - CLOSED

- 2.1 **Recommendation 1** - Police Scotland should include a field within the Complaint About the Police (CAP) form to record whether the complainer has a protected characteristic; vulnerability; individual need(s) relevant to the complaint or the handling of the complaint; whether any reasonable adjustment was required; and, if so, what adjustment was made.

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- 2.1.1 Two forms have been developed to replace the Complaint Handling Form (CHF), namely an NCARU Assessment Form and an Investigative Form following key stakeholder consultation. The data as per recommendation is now captured within the forms and will be aligned with future Centurion updates. Forms are now in use.
- 2.2 **Recommendation 2** - Police Scotland should review the timescales for acknowledging receipt of a complaint and making initial contact.
  - 2.2.1 Police Scotland now have a standard initial response communicated to a complainer upon receipt of a complaint about the police (CAP) (covers email, post and text). Notification has been added to the public facing web page publishing timescales in relation to the initial engagement from National Complaints and Resolution Unit (NCARU). On request of PIRC acknowledgement letters will be regularly revised, particularly around timescales with consultation with PIRC prior to any changes being made.
  - 2.2.2 PIRC have suggested the on-going work in relation to Six- Stage Audit Recommendation 3 (timescales) and 8 (key performance indicators) will further improve user experience across all stages of the CAP process.
- 2.3 **Recommendation 3** - Police Scotland should standardise the training provided to NCARU staff.
  - 2.3.1 Police Scotland have implemented a comprehensive training package, which includes bespoke NCARU documents, which includes practical examples and forms part of the PSD Induction course. This is a joint training programme between Police Scotland and the PIRC. Course will be subject of review with stakeholders to ensure it remains fit for purpose.
- 2.4 **Recommendation 4** - Police Scotland should develop guidance on the classification of complaints with practical examples of distinct categories, including what constitutes excessive force as opposed to assault.
  - 2.4.1 Police Scotland has created guidance on 'Practical Examples', on complaint categories in consultation with key stakeholders (internal, PIRC, SPA and CAAPD). This guidance is embedded within the PSD Induction training (Recommendation 3) and will form part of the CAP SOP toolkit.
- 2.5 **Recommendation 5** - Police Scotland should provide guidance on appropriate timescales to issue a '14-day letter' and what

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constitutes “all reasonable efforts to secure a complainer’s co-operation” within the CAP SOP.

- 2.5.1 Specific training now given within the PSD Induction training (Recommendation 3) and will form part of CAP SOP toolkit.
- 2.6 **Recommendation 6** - PIRC, the SPA and NCARU should work together to review and revise the existing complaint handling form to make it more ‘user friendly’.
  - 2.6.1 As per Recommendation 1. Police Scotland will review these forms regularly and ensure they remain fit for purpose.
- 2.7 **Recommendation 7** - Police Scotland, with input from PIRC and the SPA, should develop a training module that includes guidance on what constitutes a relevant complaint.
  - 2.7.1 Relevant complaint training now embedded within the PSD Induction training (Recommendation 3 and 5) and will form part of CAP SOP toolkit.
- 2.8 **Recommendation 8** - Police Scotland should review and revise the MI Assessment Sheet to ensure that it captures the necessary information to support the rationale for decision making.
  - 2.8.1 Following consultation with key stakeholders a revised MI Assessment Sheet was developed and has been in use since 15<sup>th</sup> October 2024. Guidance on use contained within training packages (Recommendation 3).

### 3. FINANCIAL IMPLICATIONS

- 3.1 There are no additional financial implications in this report.

### 4. PERSONNEL IMPLICATIONS

- 4.1 There are no additional personnel implications in this report.

### 5. LEGAL IMPLICATIONS

- 5.1 There are no legal implications in this report.

### 6. REPUTATIONAL IMPLICATIONS

- 6.1 There are no reputational implications in this report.

**7. SOCIAL IMPLICATIONS**

7.1 There are no social implications in this report.

**8. COMMUNITY IMPACT**

8.1 There are no community implications in this report.

**9. EQUALITIES IMPLICATIONS**

9.1 There are no equality implications in this report.

**10. ENVIRONMENT IMPLICATIONS**

10.1 There are no environmental implications in this report.

**RECOMMENDATIONS**

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