



Home Office

TRIENNIAL REVIEW OF THE INDEPENDENT POLICE COMPLAINTS COMMISSION (IPCC)

A REVIEW OF THE FUNCTIONS, EFFICIENCY AND GOVERNANCE OF THE IPCC

March 2015

EXECUTIVE SUMMARY

1. This is the first triennial review of the Independent Police Complaints Commission (IPCC). The IPCC is a Non-Departmental Public Body (NDPB), whose primary statutory purpose is to secure and maintain public confidence in the police complaints system in England and Wales. The review was carried out by a Home Office senior civil servant, Amobi Modu, with oversight by a Challenge Group. The review has been carried out in two stages. Stage one focuses on the legal status and classification, organisational structure, and partnership working of the IPCC. Stage two considers the IPCC's arrangements for control and governance, and the organisation's performance and capacity for delivering more effectively and efficiently.
2. This review was conducted at a time of wider reform within the policing system, including the recent consultation *Improving police integrity: reforming the police complaints and disciplinary systems* which set out measures to make the police complaints system fairer, more effective and more transparent, including proposals for changes to the role, powers and structure of the IPCC. The Government's response to that consultation is set out alongside this review.
3. The review has been conducted in two stages and identified several issues which it recommends the IPCC address. These are summarised below and the recommendations are listed in full in Annex 1.
4. In summary, the IPCC should:

Stage One

- Consider how to best take forward the principles and standards espoused by the Parliamentary and Health Service Ombudsman (PHSO), which seeks to enhance the standards for handling public complaints;
- Build on the concordat with Her Majesty's Inspectorate of Constabulary (HMIC) and the College of Policing (CoP) ensuring its potential is fulfilled within the guidelines of the Police Reform Act 2002;

Stage Two

- Present proposals to the Home Office in June 2015 setting out changes to governance arrangements at the IPCC, consistent with wider reforms to the police integrity landscape, which will best secure efficient, effective and accountable operations;
- Agree target dates with the Home Office for the full achievement of compliance requirements set out in relevant cross-government programmes including "Next Generation Shared Services" and "Digital by Default";
- Develop a comprehensive transparency policy with annual reporting on implementation as part of the IPCC's change programme;
- Consider by June 2015 how best to fulfil the function set out in legislation "to make such recommendations, and to give such advice, for the modification of the arrangements maintained" for the police complaints system, and serious cases involving death, corruption, serious injury or serious sexual offence;

- Build on its work with police forces' Professional Standards Departments (PSDs) and Police and Crime Commissioners (PCCs) to identify and promote effective practice in the handling of complaints, promote transparency and support effective scrutiny of local complaint handling arrangements;
- Review existing standards for IPCC staff engaged in casework and appeals, supported by high quality training;
- Consider how best to work with partners to monitor the follow up by police forces (and / or other relevant authority) to relevant recommendations it may make following investigations and appeals; and
- Undertake work to establish robust performance management arrangements with clearly defined performance indicators, benchmarks and a clear set of future expectations around productivity. As part of this work, the Home Office should secure and collate relevant benchmark data enabling inter-agency comparisons and, where appropriate, collaboration.

INTRODUCTION

5. This review of the IPCC has been carried out as part of the Government's public bodies reform agenda to conduct triennial reviews of all NDPBs. Triennial reviews have two principal aims:
 - a. To provide a robust challenge to the continuing need for individual NDPBs – both their functions and their form (Stage One); and
 - b. Where it is agreed that a particular body should remain as a NDPB, to review the control and governance arrangements in place to ensure that the public body is complying with recognised principles of good corporate governance (Stage Two).

6. In July 2014, the Home Secretary announced a wider review of the police complaints system, "including the role, powers and funding of the IPCC"¹. That review addressed the question of the continuing need for the IPCC and its functions, and resulted in a number of proposals to clarify the role of the IPCC and to strengthen its powers – set out in the Government's consultation document *Improving police integrity: Reforming the police complaints and disciplinary systems*. To avoid duplicating the work of that review, this triennial review focussed on the legal status and classification, the organisational structure, and partnership working of the IPCC (as part of Stage One) and control and governance, and the IPCC's performance and capacity to deliver more effectively and efficiently (Stage Two). The terms of reference, announced in December 2014, are at Annex 2.

Methodology

7. The evidence to support this triennial review has been gathered from a variety of sources:
 - The work of Major General Chip Chapman who conducted a review of the police disciplinary system in 2014;
 - Earlier work by the Police Integrity and Powers Unit in the Home Office who conducted a review of the Police Complaints System;
 - The many stakeholders who kindly gave their time (see Annex 5 - Collection of evidence);
 - The responses to the public consultation *Improving police integrity: Reforming the police complaints and disciplinary systems* which closed on 5 February 2015;
 - Published data and other reports; and
 - Analysis from the IPCC.

8. This review is indebted to the members of the Challenge Group (see Annex 3 - Membership of Challenge Group) for their advice and time, to the Arms Length Body Sponsorship Team in the Crime and Policing Group in the Home Office, to the many stakeholders and experts who gave their time, and to the Chair, Commissioners, Chief Executive and staff of the IPCC for their co-operation and assistance.

¹ Oral Statement 22 July 2014

ABOUT THE IPCC

9. The IPCC was set up in 2004 to replace the Police Complaints Authority. The IPCC's purpose and powers are enshrined in the 2002 Police Reform Act.
10. The IPCC's primary statutory purpose is to secure and maintain public confidence in the police complaints system in England and Wales. The IPCC aims to fulfil its statutory duty through three main functions:
 - a. Oversight of the system to ensure complaints are handled well and that any identified failings lead to improvements in policing;
 - b. Carrying out its own investigations into the most serious matters relating to the conduct of the police; and
 - c. Considering appeals when a police force investigation is called into question.
11. The IPCC's remit covers staff serving in all the police forces in England and Wales, as well as the National Crime Agency, Her Majesty's Revenue & Customs and some functions of Home Office immigration enforcement staff. The IPCC's remit has recently been extended to include all staff working for the CoP and private sector contractors exercising policing functions. In addition, the IPCC investigates some criminal allegations against PCCs and their deputies and staff.
12. The IPCC fulfils the Government's obligations under Article 2 of the European Convention of Human Rights to ensure the independent investigation of the use of force by the state resulting in the loss of life.
13. The Commission has a Chair, two Deputy Chairs, eight Commissioners, four non-executive (non-operational) Commissioners, and two Associate Commissioners (with commissioner powers but no governance responsibilities). All Commissioners (excluding Associates) are public appointments made by the Home Secretary. It is a legislative requirement that none of the Commissioners has served as a police officer, in order to ensure independence.
14. The Commission is supported by a Chief Executive who leads a staff of about 800 people, located at a number of sites across England and Wales. The majority of the IPCC's staff are engaged in investigations and casework, including over 100 staff working on the Hillsborough investigation.
15. The IPCC's budget for 2013/14 was approximately £33.2m, with an additional £4.9m of capital spending. In addition, funding of £8.9m was provided for the investigation into Hillsborough. The IPCC typically investigates about 150 cases a year while also providing supervision and management to investigations conducted by police PSDs, as well as handling appeals.
16. The IPCC is currently undertaking a three-year change programme to deliver the Home Secretary's commitment to ensure that it investigates all 'serious and sensitive cases' involving the police. This means that the Commission is undergoing significant organisational change with staff numbers expected to increase to around 1000 in 2016 (compared to around 400 in 2014). The additional funding to support this expansion was announced as part of the annual Police Grant Report laid before Parliament.

Background to the Review

17. Public confidence in the police is the very basis of the UK's model of policing by consent. Misconduct by individual officers can damage public trust. That is why the IPCC plays such an important role, by providing independent investigations into the most serious cases, and reinforcing the need for police officers to act at all times with the highest standards of integrity.
18. This review of the IPCC forms part of Government's wider programme of reform to make the police more accountable to their local communities, including changes to the police complaints and disciplinary systems. Proposals are set out alongside this review, in the Government's response to the Police Integrity consultation, and regulations amending the police complaints system.
19. The CoP, the IPCC, and HMIC are together engaged in these significant improvements. The Code of Ethics for police officers has been published by the CoP, which has also created a national register of police officers who have been struck off. Police force inspections by the HMIC will now extend to considering how well each force provides a service that is legitimate in the eyes of the public. An effective and efficient IPCC will be critical to securing these changes.
20. The Home Secretary has substantially increased the level of resourcing available to the IPCC and instigated wider reforms to the police integrity landscape, saying "Complaints must be responded to in a way that restores trust, builds confidence, and allows lessons to be learned. The handling of police complaints must be customer focused, simple to understand and transparent throughout".

STAGE ONE

21. Normally Stage one of a triennial review would consider the continuing need for the functions of the body in question. As discussed in the introduction, the police complaints review, announced in July 2014, addressed the question of the continuing need for the IPCC and its functions. To avoid duplication, therefore, Stage one of this triennial review focused on:
 - a. The IPCC's legal status and classification;
 - b. Organisational structure; and
 - c. Partnership working and alignment with other policing organisations.

22. The Cabinet Office has set out three criteria, any one of which would justify the existence of an NDPB. These are: that its activities need to be, and be seen to be, delivered with absolute political impartiality; that it needs to act independently of Ministers to establish facts and/or figures with integrity; and that it performs a technical function which needs external expertise to be delivered. For example a function that could not be delivered in a department by civil servants, and where it would not be appropriate to recruit staff with the necessary skills to the department to undertake the function. The IPCC meets the first two of these tests. It is clear that its functions are best carried out by an independent body which is capable of reaching decisions about complaints and appeals without fear or favour, and unhindered by responsibilities for other functions which would detract from their perceived independence and the need to secure and maintain public confidence in the complaints system.

23. None of the consultation responses from the public or stakeholders have made any suggestion that the functions of the IPCC are no longer required, should be merged with another organisation, or be delivered by any different organisation. The independent investigation of death and serious injury is a requirement of Article 2 of the European Convention of Human Rights, and the IPCC is the principal means of complying with this requirement.

LEGAL STATUS AND CLASSIFICATION

24. Section 10, subsection 1 (e) of the 2002 Police Reform Act requires the IPCC to draw on its unique knowledge of the complaints system to shape its future structure and legal status - an additional element of what the IPCC regards as its "guardianship" or oversight function (covered in greater detail within stage two). This gives the IPCC the duty "to make such recommendations, and to give such advice, for the modification of the arrangements maintained with respect to those matters, and also of police practice in relation to other matters, as appear, from the carrying out by the Commission of its other functions, to be necessary or desirable". The IPCC partly fulfils this through both the 2013 revised guidance to police forces on the handling of police complaints, and its ongoing work with the CoP.

25. The IPCC is encouraged to be more proactive in keeping its legal status and classification, organisational structure and partnership working or alignment with other bodies under permanent review. In order to both revise and improve the statutory guidance it publishes, as well

as developing relevant proposals for the Government to consider from time to time where primary or secondary legislation might be required, in addition to its core mission. Options include a periodic review of the entirety of the arrangements, highlighting what is working well and what is not, with clear proposals submitted to the Home Office for such reforms as may be necessary.

ORGANISATIONAL STRUCTURE

26. As part of its change programme, the IPCC is developing a target operating model. This involves redesigning organisational and business processes to facilitate the IPCC providing independent investigation of all serious and sensitive cases by 2017/2018. The IPCC plans to:
- Put in place new organisational design and operating processes to support the range of investigations the IPCC will be taking on and deliver them to a high standard;
 - Put in place the systems and measures needed to manage all aspects of the IPCC's work effectively, be on top of operational challenges, expose under-performance and be able to take decisive and appropriate management action;
 - Adopt a performance framework that includes timeliness, quality and unit costs; and
 - Improve their knowledge management capability to support this performance framework, ensuring evidence based decision-making and working effectively with partners (such as the Crown Prosecution Service (CPS), Coroners, PCCs, CoP and HMIC) to share data and insights that can drive systemic improvement and, therefore, increase confidence in the complaints system as a whole.
27. The IPCC has also agreed several principles (listed below) to guide its change programme and future reforms:
- Visible and strong independence from the Government, police and complainants in decision making and policy;
 - Separation of governance and operations;
 - Effective and consistent decision making;
 - Internal challenge mechanisms which support visible independence;
 - Clear accountability for decision making;
 - Visible diversity in terms of both specialised skills and protected characteristics;
 - Able to operate at scale (including being able to take quick decisions for example about handling unexpected surges in casework); and
 - Service wide relevance including maintaining parity in Wales, and links with all complaints handling bodies in Wales and with the Welsh Government.
28. The Parliamentary and Health Service Ombudsman ((PHSO) which works with all ombudsmen across the public sector) is seeking to enhance the standards for handling public complaints. The Ombudsman has set out several principles, which include ensuring the relevant complaint handling arrangements are in place and that these reinforce continuous improvement.

29. **Recommendation 1**

That the IPCC should build on the principles it is adopting and consider how best to take forward the principles and standards espoused by the Parliamentary and Health Service Ombudsman.

PARTNERSHIP WORKING AND ALIGNMENT WITH OTHER BODIES

30. Currently, the police complaints system is broadly split between the IPCC which handles the most complex and serious cases and the PSD of each police force.
31. The IPCC has three key partner agencies:
- a. The HMIC independently assesses police forces and policing. Its inspections play a crucial role in providing information to the public, enabling them, through their PCC, to compare the performance of their force against others and to drive improvements in policing. The Government believes that HMIC should continue to play a role in inspecting the efficiency and effectiveness of the police complaints system and is considering extending its remit to cover staff working for PCCs dealing with complaints. Currently, HMIC has no remit to inspect PCCs or their staff;
 - b. The CoP provides professional standards for policing and to help police officers and staff meet those standards throughout their careers. Its remit is to seek out best practice, as supported by firmly-established evidence, and to ensure that officers and staff understand and comply with the highest ethical standards; and
 - c. The CPS takes forward the prosecution of police officers where criminal activity has been identified. The CPS:
 - i. decides which cases should be prosecuted – keeping them all under continuous review;
 - ii. determines the appropriate charges in more serious or complex cases – advising the police during the early stages of investigations;
 - iii. prepares cases and presents them at court - using a range of in-house advocates, self-employed advocates or agents in court; and
 - iv. provides information, assistance and support to victims and prosecution witnesses.
32. The IPCC has strong partners in the CoP, HMIC and the CPS. Collectively, these organisations are at the heart of an emerging regulatory framework that determines, monitors and assesses the standards to which the police deliver their functions in fighting crime. While complementary, each of these partner agencies has a unique role in setting standards, assessing performance against those standards and ensuring the public is better informed and able to exercise some accountability over policing through the ballot box.
33. The developing collaboration between the three agencies is evidenced through the recent adoption of a concordat² between all three and a growing body of work for example:

² The concordat was published on 24 September 2014 and outlined how the IPCC, the CoP and HMIC intend to work together to encourage sharing of information and best practice.

- **Authorised Professional Practice (APP)** – the IPCC provides the CoP with information on learning, trends and themes to support development of APP in areas such as mental health, call handling and custody including case studies, key learning and thematic patterns.
- **Training and knowledge sharing** - The IPCC has contributed to the policing curriculum to develop learning descriptors to inform training on stop and search, taser usage, custody and detention.
- **Support for peer reviews** - Data on child sexual exploitation is being provided to the CoP to inform force peer reviews on how allegations of child exploitation are dealt with nationally and the IPCC will sit on the national reference group that guides this area of work.

34. There is more that can be done with strategic partners including the CoP and HMIC. There is evidence of some unintended confusion over the standard-setting process with both the CoP and IPCC having published references to roles in standard setting. Some police PSDs have questioned whether the IPCC role should extend to standard-setting given the establishment of the CoP with its clear remit to set professional standards in policing.

35. **Recommendation 2**

The IPCC should build on the concordat with HMIC and the CoP ensuring its implementation fulfils the IPCC’s statutory obligations under the Police Reform Act 2002.

STAGE TWO

36. Stage two of this review focuses on the IPCC’s arrangements for control and governance, and the organisation’s performance and capacity for delivering more effectively and efficiently.

CONTROL AND GOVERNANCE

37. Section 9 and Schedule 2 of the Police Reform Act 2002 give various powers and responsibilities to 'the Commission' (i.e. the Chair and a minimum of 10 other members, including 2 Deputy Chairs and a Chief Executive).
38. The legislation does not set out a detailed description of the Commissioner role. Over the 11 years since the IPCC was established, policy, custom and practice have shaped operational arrangements.
39. The IPCC has explained existing governance as follows: “The Commission is the governing board of the IPCC. It holds collective responsibility for governance of the Commission including oversight of the executive”. As public office holders, Commissioners oversee and take ultimate responsibility for IPCC investigations, casework and the promotion of public confidence in the complaints system. Those Commissioners with operational responsibilities act under the delegated authority of the Commission in making decisions on individual cases. The Deputy Chairs have policy and casework responsibilities. Commissioners work from one of the IPCC offices in England and Wales and hold prime responsibility for designated police forces - named Commissioners lead all of the IPCC’s work with designated police forces and other agencies subject to IPCC oversight. Additionally, individual Commissioners lead on specific priority areas which guide their work, especially community engagement.
40. The members of the Commission (as at March 2015) are:

Dame Anne Owers	(Chair) - part time (3 days); non executive
Sarah Green	(Deputy Chair) - Metropolitan Police Service (MPS)
Rachel Cerfontyne	(Deputy Chair) - Thames Valley, Devon & Cornwall, Civil Nuclear Constabulary
Mary Cunneen	Essex, Bedfordshire, Hertfordshire, Cambridgeshire, Kent, Ministry of Defence, Port of Tilbury
Jennifer Izekor	Surrey, Sussex, Hampshire, some immigration enforcement, British Transport Police, City of London, MPS Cases
Cindy Butts	MPS Cases, Avon & Somerset, Port of Bristol, Dorset,
Jan Williams	North Wales, Dyfed Powys, South Wales, Gwent
Kathryn Stone	North Yorkshire, South Yorkshire, West Yorkshire, Humberside, Derbyshire, Staffordshire

Carl Gumsley	Durham, Northumbria, Cleveland, Port of Tees & Hartlepool, Lancashire, Cumbria, National Crime Agency, Her Majesty's Revenue and Customs.
James Dipple-Johnstone	Greater Manchester, Merseyside, Cheshire, Port of Liverpool
Derrick Campbell	West Midlands, West Mercia
Jonathan Tross	(Non-executive Commissioner) – Chair of the IPCC Audit and Risk Committee and IPCC Quality Committee
Ruth Evans	(Non-executive Commissioner) – Chair of the IPCC Remuneration Committee
David Bird	(Non-executive Commissioner)
Sue Whelan-Tracy	(Non-executive Commissioner)

41. The IPCC has two Associate Commissioners, who are not part of the Commission. They do not have non-executive status:

Guido Liguori	(Associate Commissioner) – Gloucestershire and other cases where requested by the Deputy Chairs
Tom Milsom	(Associate Commissioner) – Wiltshire and other cases where requested by the Deputy Chairs

42. The IPCC also has four non-executive Commissioners, **Jonathan Tross, Ruth Evans, David Bird** and **Sue Whelan-Tracy**. They are responsible for providing objective scrutiny and taking responsibility for those areas in which Commissioners with force responsibilities might have a conflict of interest.

43. All Commissioners are public appointments and the Chair is a Royal appointment. The Chair and non-executive Commissioners are part-time appointments. The Commissioners are full-time appointments and are made through open competition. The Associate Commissioners are employees of the IPCC. By law, no member of the Commission may have served as a police officer.

44. The roles of the Commissioners and the governance arrangements reflect both statutory requirements and evolving practice, resulting in the Commissioners being engaged in both the governance of the organisation and in operational activity. This dual role of most of the Commissioners is not fully compliant with Cabinet Office guidance.

45. Relevant guidance stipulates that there should be a “clear division of roles and responsibilities between non-executive and executives” with a chief executive who should “be accountable to the Board for the ultimate performance of the public body and for the Implementation of the Board’s policies. He or she should be responsible for the day-to-day management of the public body and should have line responsibility for all aspects of executive management” (see Annex 6 - IPCC Compliance). This constitutes formal guidance and NDPBs are required to comply, or explain why not.

46. Recognising the importance of the IPCC's governance arrangements, the review team arranged for a specific question to be inserted into the public consultation document on police integrity launched in late 2014. The question (Q43) asked **“What changes to the organisational structure of the IPCC would support the IPCC to increase its caseload and public confidence in the complaints system?”**³
47. There were a wide variety of responses to this consultation question. The most common view was that the IPCC should be able to determine its own structure and governance arrangements, subject to principles agreed by Parliament. Other respondents thought that IPCC's structure should be regionalised. Some respondents commented on the need for the IPCC to develop greater expertise, several mentioned the importance of high quality training for all at the IPCC, and some felt the IPCC was both expert and representative of the communities our police forces serve.
48. There was wide agreement from those interviewed as part of this triennial review that the dual operational and governance role is not sustainable in the much larger organisation that the IPCC will become. It poses risks in delivering a much higher volume of investigations, risks for the board itself in balancing strategic direction with operational detail in board discussions, and the potential for confused operational decision-making and accountability between Commissioners and investigative staff. It has already been agreed that a significant number of new investigations will proceed without direct Commissioner oversight, which will be reserved for the most serious and high profile cases. The value of Commissioner oversight and decision-making in such cases, and the important internal and external assurance and challenge they provide, is well recognised.
49. Over the course of discussions, it has become clear that the Commission and the Management Board have recognised these risks and are determined to act to address these issues. The IPCC has set out the steps it has already taken to make changes within the current statutory framework by:
- a. Introducing three Commission Committees, chaired by non-executive Commissioners, to oversee key areas of work: Audit and Risk, Strategy and Impact, and People and HR;
 - b. Agreeing a scheme of delegation, which clarifies those corporate matters that are delegated to the executive team;
 - c. Ensuring that the Commission has sight of, and can monitor, effective performance measures; and
 - d. Setting up an Operations Board, chaired by the Chief Operating Officer, with Commissioner input, to provide oversight of operational work.
50. The IPCC noted that “within that framework, the lines of governance, accountability and decision-making are not as clear as we would like or as are needed within a considerably larger organisation”.

³ <https://www.gov.uk/government/consultations/improving-police-integrity-reforming-the-police-complaints-and-disciplinary-systems>

51. It is important that these issues are resolved as soon as practicable to ensure that the IPCC has more effective governance and clearer accountabilities in order to operate effectively following expansion.

52. **Recommendation 3**

The IPCC should consider what governance arrangements, consistent with wider reforms to the police integrity landscape, will best secure efficient, effective and accountable operations. This should, in line with Cabinet Office guidance, include a separation of the governance and operational roles. The Commission should take forward this recommendation with some urgency with proposals being presented to the Home Office in June 2015, and the Home Office should consider the IPCC's proposals in the light of Cabinet Office guidance.

PERFORMANCE AND CAPACITY TO DELIVER MORE EFFICIENTLY AND EFFECTIVELY

53. It is Government policy that Departments of State and their NDPBs should seek to maximise efficiencies, and relevant guidance has recently been made available. To that effect, the IPCC was asked to self-assess for compliance against these requirements and their analysis is detailed at Annex 7 - IPCC Compliance - Cabinet Office Administrative and efficiency requirements.

54. The IPCC are already undertaking work aligned to a number of cross-Government agendas relating to efficiency. This includes the Digital Strategy, where IPCC is cloud-sourcing its core IT platform via the G-Cloud framework in line with Government Digital Service policy. This will ensure the infrastructure and the IPCC digital channels will continue to meet the Digital by Default Service Standard.

55. On estates, IPCC is developing its planning with an explicit preference for using existing Government property wherever possible, in order to reduce costs and to ensure best value for Government. Further work on estates will need to be undertaken working in close collaboration with Home Office Property Team.

56. In relation to the Next Generation Shared Services agenda (which promotes Government departments and Arm's Length Bodies working together to share functions such as HR, procurement, finance and payroll) the IPCC is exploring ways to deliver potential savings.

57. The IPCC should continue to work within these wider frameworks for efficiency as it develops and implements its target operating model.

58. **Recommendation 4**

IPCC should, as part of its change programme, agree target dates with the Home Office for the full achievement of compliance requirements set out in relevant cross-government programmes including "Next Generation Shared Services" and "Digital by Default". These programmes should improve the quality and efficiency of IPCC services and without impacting on the independence of the organisation in its responsibilities for the complaints system.

IPCC Change Programme

59. In February 2013 the Home Secretary committed to transfer additional resources for the IPCC to enable it to investigate all 'serious and sensitive cases'. The IPCC is expected to achieve this capacity by 2017/18.
60. The IPCC is one year into a three year change programme, which has recently undergone a review of progress so far. The change programme so far has involved:
- Staff numbers increasing from 390 in 2014 to 800 in March 2015 (and a planned 1,000 in 2016);
 - Two new offices have been opened;
 - New processes have been developed to enable the delegation of some of the less serious and complex investigations, so that they can be completed without Commissioner input; and
 - The executive management team structure is being restructured with a new Chief Executive, the establishment of a new Chief Operating Officer who has an oversight and grip on all operational performance; a Director of Strategy and Impact whose directorate brings together all strategy, policy, analysis and communications functions; and the short term appointment of a Director of Change (see Annex 4, IPCC Organisation Chart).
61. As part of its change programme, the IPCC is developing a target operating model. This involves both organisational and business process re-design intended to facilitate the independent investigation of all serious and sensitive cases by 2017. The IPCC plans to:
- put in place a new organisational design and operating processes that support the range of investigations the IPCC will be taking on and deliver those to a high standard;
 - put in place the systems and measures that enable the IPCC to manage all aspects of our work effectively, be on top of IPCC operational challenges, expose over- or under-performance and be able to take decisive and appropriate management action;
 - adopt a performance framework that includes all aspects of performance including timeliness, quality and unit costs; and
 - Improve IPCC knowledge management capability to support this performance framework, ensure evidence based decision-making and work effectively with partners (e.g. CPS, Coroners, PCCs, CoP, HMIC) sharing data and insights that can drive systemic improvement and, therefore, confidence in the complaints system as whole.
62. This is a large-scale and complex change programme. It is imperative that the IPCC continue to involve and to keep key partners apprised of progress – in particular the Government and police forces, who are funding the programme through a reallocation of their funding.
63. **Recommendation 5**
A comprehensive transparency policy with annual reporting on implementation should be developed as part of the IPCC's change programme.

Oversight of the Complaints System

64. As part of wider police integrity reforms the Home Secretary has stated that “public confidence in the IPCC and the police complaints system more broadly is vital to improving public confidence in the police⁴.”
65. The Police Reform Act 2002 provides an opportunity for the IPCC to draw on its unique knowledge of the complaints system to shape the police complaints process. Its role includes the duty to “make such recommendations, and to give such advice, for the modification of the arrangements maintained with respect to those matters, and also of police practice in relation to other matters, as appear, from the carrying out by the Commission of its other functions, to be necessary or desirable.” The IPCC’s oversight function is critical to securing and maintaining public confidence in the complaints process and the IPCC draws on learning from its work to “influence changes in policing, ensure accountability and spread best practice and high standards of customer service”⁵.
66. The IPCC partly fulfils this by producing guidance to police forces on the handling of police complaints (revised in 2013), and through its ongoing work with the CoP. This is in addition to the collection and analysis of complaints statistics, including the publication of:
- Quarterly and annual complaints statistics and annual death statistics;
 - Thematic reviews e.g. Mental Health, Police Corruption etc;
 - Focus, a bi-monthly publication launched in April 2014 offering “practical guidance to appropriate authorities on handling complaints, conduct matters, and death or serious injury matters within the Police Reform Act 2002”⁶; and
 - ‘Learning the Lessons’, a bulletin distributed to police forces summarising investigations conducted by the Independent Police Complaints Commission (IPCC) or police forces where learning opportunities are identified⁷.
67. As the IPCC recognises, public assurance requires a proper balance between its oversight and the casework functions. The Government in its response to the Home Affairs Select Committee (HASC) report⁸ welcomed “the work that the IPCC are doing to enhance their oversight role of the complaints system and renew their external communications strategy to ensure the positive outcomes of its work are communicated effectively⁹”. The Government provided an additional £0.4m for 2013-14 to conduct a review of how to improve its oversight role. The Commission has since published an oversight and confidence strategy.
68. The IPCC should continue to consider how best to deliver its oversight function and, in particular, how it can build on this as part of changes to its organisational structure given its legal duty to give

⁴ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/228950/8598.pdf

⁵ IPCC Annual Report 2013-14

https://www.ipcc.gov.uk/sites/default/files/Documents/publications/annual_report_IPCC_2014.PDF

⁶ <https://www.ipcc.gov.uk/page/focus>

⁷ <https://www.ipcc.gov.uk/reports/learning-the-lessons/bulletins>

⁸ <http://www.parliament.uk/business/committees/committees-a-z/commons-select/home-affairs-committee/news/130201-ipcc-report-published/>

⁹ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/228950/8598.pdf

recommendations on the modification of arrangements with respect to the complaints system as a whole.

69. Recommendation 6

The IPCC should consider by June 2015 how best to fulfil the function set out in legislation “to make such recommendations, and to give such advice, for the modification of the arrangements maintained with respect to those matters” (the complaints system, death, corruption, serious injury and serious sexual offence). In doing so, the Commission should have regard to the work of the Parliamentary and Health Service Ombudsman to improve public sector complaint handling.

70. The Government’s proposals, as set out in the consultation *Improving police integrity; reforming the police complaints and disciplinary systems*, envisage PCCs playing a central role in deciding how the complaints system is run at a local level, making sure that complainants are dealt with promptly, are supported through the system and that their complaints achieve a satisfactory outcome. The role would include the following responsibilities:
- a. Receiving and recording a complaint;
 - b. Assessing and allocating a complaint either for local resolution, local investigation or national investigation by the IPCC, taking account of the mandatory referral criteria;
 - c. Acting as a single point of contact and communication for the complainant, explaining the process to the complainant and acting as the main link between the complainant and the complaints system, including where a complaint requires an investigation by the police; and
 - d. Resolving complaints that are appropriate for local resolution, driving proportionate remedies such as an apology or independent mediation.
71. Effective oversight of the entirety of the police complaints system requires that the IPCC engage closely with PCCs. The IPCC should seek to ensure there is transparency not just in its own handling of investigations and appeals but in local arrangements too. There should be minimum standards of transparency with PCCs required to publish complaints statistics including analysis of patterns and trends along with an indication of what action may be needed to secure improvements.
72. The IPCC should work to support local scrutiny and debate about what is and isn’t working well in each force area. Not only would such transparency ensure support and oversight of the complaints system, it could also help now that complaints have been extended to policing policy, in the primary role of the PCC in setting priorities and holding the chief constable to account for the delivery of those priorities.
- 73. Recommendation 7**
- The IPCC should build on its work with PSDs and PCCs to:**
- a. identify and promote effective practice in the handling of complaints;**
 - b. promote transparency in local complaint handling; and**
 - c. support effective scrutiny of local complaint handling arrangements.**

Investigations and casework

74. The IPCC receives around 3,000 referrals from police forces each year. Prior to its increase in funding, the IPCC would investigate around 100-150 cases per year. In addition the IPCC receives appeals from complainants (in 2013/14, it received 4,243 appeals).
75. Over the years the IPCC has faced public, complainant, legal representative, the media, police, judicial¹⁰, parliamentary, and internal criticisms of the quality of its investigations and casework, some of which commenced within a few years of the IPCC's establishment. This has damaged public confidence in the police.
76. There has been considerable public debate about the IPCC's work, much of it inspired by high profile cases like Mark Duggan, Sean Rigg and others. The Police Action Lawyers Group, following the resignation of several members from the IPCC advisory body in 2008 wrote to the then IPCC chairman criticising the "poor quality of decision-making at all levels of the IPCC¹¹."
77. In November 2012 the IPCC commissioned a report by Dr. Sylvia Casale to review its handling of the Sean Rigg case and published its findings in May 2013¹². The HASC published a report in January 2013¹³ which identified shortcomings of the IPCC.
78. In 2012, the IPCC set up a review of its work in investigating deaths. This took place over a two-year period, directly engaging with families and their legal representatives, and was overseen by an independent reference group, including Inquest. The findings and recommendations of the review have driven major changes in the way the Commission investigates deaths, its engagement with families, and its customer focus, changes which have been commended by the reference group and stakeholders.
79. There is no evidence to suggest that there are ongoing issues with the way that the IPCC conducts investigations and casework. Nonetheless, it is important for public confidence that the IPCC's investigations are, and are seen to be, of the highest quality, particularly as the IPCC is being funded to take on many more cases. The delivery of the change programme is an opportunity for the IPCC to ensure that standards for its staff are appropriate to ensure the delivery of consistently high-quality work.
80. **Recommendation 8**
That the Commission review existing standards for IPCC staff engaged in casework and appeals, supported by high quality training.
81. When a final investigation report is submitted to the appropriate authority, they make their own determination as to whether or not there is a case to answer and what disciplinary action (if any)

¹⁰ for example Justice Saunders re Nicola Dennis (2008)

¹¹ <http://www.theguardian.com/politics/2008/feb/25/police.law1>

¹² https://www.ipcc.gov.uk/sites/default/files/Documents/investigation_commissioner_reports/Review_Report_Sean_Rigg.PDF

¹³ <http://www.parliament.uk/business/committees/committees-a-z/commons-select/home-affairs-committee/news/130201-ipcc-report-published/>

they propose to take. If the IPCC does not agree, they have a power to recommend and then direct under paragraph 27 Schedule 3 Police Reform Act 2002. Consideration is sometimes given at this stage to the prospects of success, for example any evidential difficulties or witnesses who will refuse to co-operate, but each case will be highly sensitive to the particular facts of the case.

82. There is some evidence from surveys suggesting that members of the public would consider making a complaint whether a prosecution follows or not, because of a desire to help future misconduct investigations or address wider system failures (although it is recognised that some complaints are vexatious). A 2014 survey found that 79%¹⁴ of those questioned would be more likely to complain if they knew it would make a difference to other people's experience of public services.
83. Where a case handled by the IPCC results in recommendations for a police force to act on, it is then important that this is followed up to see what action has been taken.
84. A review in 2013 commissioned by the MPS of its handling of mental health cases (led by Lord Adebowale¹⁵,) found that the MPS, which receives over 7,000 complaints a year, (according to the MPS Police Standards Department) did not keep a central record of all cases involving a referral to the IPCC, and that the MPS had not shown due diligence in acting on individual recommendations from the IPCC or coroner's inquests and for monitoring their implementation.
85. The HASC, in its earlier report, recommended a threshold (25%) for appeals regarding the handling of complaints by police forces above which action should be taken with individual forces: such action could build on the developing partnership working between HMIC and the CoP.
86. Public confidence in the complaints system is affected by the degree to which forces make improvements following the identification of failures by the IPCC. There is more scope for monitoring the extent to which the IPCC's recommendations are acted on.
87. **Recommendation 9**
Consider how best to work with partners to monitor the follow up¹⁶ by police forces (and / or other relevant authority) to relevant recommendations it may make following investigations and appeals.
88. The IPCC's senior management team is clear that improvements in performance management are required. It should not be the case that a complaint "takes as long as it takes". Whilst timeliness is dependent on factors outside the control of the IPCC, such as police officer co-operation and resource availability, there is a widely held view that the IPCC has sometimes been slow in handling casework with a few non-complex cases taking many months to complete. This means that the complainants' need for a conclusion is effectively placed on hold, as are the careers of

¹⁴ "Making Complaints Count" in public services, research findings from Which Magazine, April 2014.

¹⁵ Independent Commission on Mental Health and Policing published May, 2013 – see http://news.bbc.co.uk/1/shared/bsp/hi/pdfs/10_05_13_report.pdf

¹⁶ This should include the justification for non-compliance with a recommendation made by the Commission.

some police officers, who may be suspended on full pay for the duration of an investigation, giving rise to additional concerns about the wider impacts on the police force's efficiency and effectiveness. Whilst data is currently collected and reported to the Commission, better management information is needed to help drive performance improvements, particularly timeliness, as acknowledged by the IPCC's own reforms.

89. The IPCC should be aware of, and may wish to draw on, the experience of the PHSO which has significantly increased the number of complaints they handle without considerable new resource. This has been achieved by reviewing the model they used and moving away from a 'Rolls Royce' approach where all investigations can take as long as they take. In a large majority of cases, their final decision is made within 3-4 months, yet PHSO investigators had previously taken a further number of months simply to gather additional evidence to try to build an unassailable case.
90. As part of its change programme, the IPCC recognise the need to do more work to establish a performance framework within which they can drive, and assess, improvements in the delivery of their investigations and casework, particularly with regards to timeliness.

91. **Recommendation 10**

That more work is undertaken to establish robust performance management arrangements with clearly defined performance indicators, benchmarks and a clear set of future expectations around productivity. As part of this work, the Home Office should secure and collate relevant benchmark data enabling interagency comparisons and, where appropriate, collaboration.

ANNEX 1 – FULL LIST OF RECOMMENDATIONS

Recommendation 1

That the IPCC should build on the principles it is adopting and consider how best to take forward the principles and standards espoused by the Parliamentary and Health Service Ombudsman.

Recommendation 2

The IPCC should build on the concordat with HMIC and the CoP ensuring its implementation fulfils the IPCC's statutory obligations under the Police Reform Act 2002.

Recommendation 3

The IPCC should consider what governance arrangements, consistent with wider reforms to the police integrity landscape, will best secure efficient, effective and accountable operations. This should, in line with Cabinet Office guidance, include a separation of the governance and operational roles. The Commission should take forward this recommendation with some urgency with proposals being presented to the Home Office in June 2015, and the Home Office should consider the IPCC's proposals in the light of Cabinet Office guidance.

Recommendation 4

IPCC should, as part of its change programme, agree target dates with the Home Office for the full achievement of compliance requirements set out in relevant cross-government programmes including "Next Generation Shared Services" and "Digital by Default". These programmes should improve the quality and efficiency of IPCC services and without impacting on the independence of the organisation in its responsibilities for the complaints system.

Recommendation 5

A comprehensive transparency policy with annual reporting on implementation should be developed as part of the IPCC's change programme.

Recommendation 6

The IPCC should consider by June 2015 how best to fulfil the function set out in legislation "to make such recommendations, and to give such advice, for the modification of the arrangements maintained with respect to those matters" (the complaints system, death, corruption, serious injury and serious sexual offence). In doing so, the Commission should have regard to the work of the Parliamentary and Health Service Ombudsman to improve public sector complaint handling.

Recommendation 7

The IPCC should build on its work with PSDs and PCCs to:

- a. Identify and promote effective practice in the handling of complaints;
- b. Promote transparency in local complaint handling; and
- c. Support effective scrutiny of local complaint handling arrangements.

Recommendation 8

That the Commission review existing standards for IPCC staff engaged in casework and appeals, supported by high quality training.

Recommendation 9

Consider how best to work with partners to monitor the follow up by police forces (and / or other relevant authority) to relevant recommendations it may make following investigations and appeals.

Recommendation 10

That more work is undertaken to establish robust performance management arrangements with clearly defined performance indicators, benchmarks and a clear set of future expectations around productivity. As part of this work, the Home Office should secure and collate relevant benchmark data enabling interagency comparisons and, where appropriate, collaboration.

ANNEX 2 – TERMS OF REFERENCE

OBJECTIVE

To carry out a Triennial Review of the Independent Police Complaints Commission (IPCC).

BACKGROUND

A triennial review is the process for reviewing the form and function of Non-Departmental Public Bodies (NDPBs), the appropriateness of the body's delivery mechanism and its governance arrangements.

The aims of a Triennial Review are:

- To provide a robust challenge of the continuing need, in terms of both their form and functions for individual NDPBs; and
- Where it is agreed that a particular body should remain as a NDPB, to review:
 - The control and governance arrangements in place to ensure it is complying with recognised principles of good corporate governance, including an assessment of its performance; and
 - Its capacity for delivering more effectively and efficiently, including identifying potential for efficiency savings and its ability to contribute to economic growth.

The Home Secretary agreed with the Minister for the Cabinet Office in 2011 that a review of the IPCC would be announced in year three of the first review programme. This was put back to year one of the second programme (2014-17) but to ease the burden on the IPCC during a critical time of change, the Home Secretary agreed in April 2014 for it to take place late 2014 / early 2015.

THE INDEPENDENT POLICE COMPLAINTS COMMISSION

The IPCC was established by the Police Reform Act 2002 and began work in April 2004. Its primary statutory purpose is to secure and maintain public confidence in the police complaints system in England and Wales. The IPCC is independent, making its decisions entirely independently of the police and Government. As a NDPB however, in relation to the use of public funding, the IPCC is accountable to the Home Office and through Home Office ministers to Parliament. Dame Anne Owers is Chair and Lesley Longstone Chief Executive of the IPCC.

2013 / 14 figures show a net expenditure of £40.2 million, an increase of £6.9 million from the previous year. This was a result of additional resources for the Hillsborough investigation and additional staff and consultants for planning the IPCC expansion. In summary, the £40.2 million was used for employing an average 500 staff, outsourcing the secure IT system, providing the estates infrastructure necessary to operate the business effectively across England and Wales, financing the non-cash charges as they write-down assets and paying for other operational costs.

In February 2013, the Home Secretary announced proposals to transfer resources from police forces to the IPCC to enable them to carry out more independent investigations into serious and sensitive allegations. In 2014/15, a change programme to develop a new operating model to change the way the IPCC is structured and the way it works was set up with a focus on quality and timeliness as well as quantity and value for money. £18 million additional revenue funding to be spent on the recruiting and

training of additional staff to take on more serious and sensitive cases has been provided along with £10 million capital funding for the fitting out of offices and expanding the IT.

SCOPE

The triennial review of the IPCC will be conducted on behalf of the Secretary of State for the Home Department and will be undertaken in accordance with the published Cabinet Office guidance on how these reviews should be undertaken. This can be found on the GOV.UK website at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/332147/Triennial_Reviews_Guidance.pdf

The review will be carried out in close consultation with the IPCC which will have the opportunity to input to the review. Views will be sought from a range of stakeholders.

Additionally, this triennial review is being conducted in parallel with a comprehensive review of the police disciplinary and complaints system. Officials have committed to working closely together to draw on each other's work where appropriate to avoid duplication.

There are two stages to a triennial review:

Stage 1 assesses the continuing need for the body. The standard questions a triennial review looks to answer are:

- Identify the key functions of the body and assess how they contribute to the core business of the Home Office and, where appropriate, other Government departments;
- Assess the requirement for the functions to continue;
- If they are to continue, assess the delivery options and how the function might best be delivered. This should include consideration of whether related functions delivered through two or more bodies could be amalgamated and delivered through one; and
- Apply the Government's "three tests" if the body is to remain as an NDPB.

The tests are:

- a. Is this a technical function which needs external expertise to deliver?
- b. Is this a function which needs to be, and be seen to be, delivered with absolute political impartiality (such as certain regulatory or funding functions)?
- c. Is this a function which needs to be delivered independently of ministers to establish facts and / or figures with integrity?

We are committed to avoiding duplication and recognise that these questions have to a great extent already been addressed in the policy reviews which are now finishing on the complaints system and on the disciplinary system. The extensive evidence gathering of those reviews will be available to the triennial review, however it is not proposed to consider the areas that those reviews have covered. Any aspects of stage 1 which are not already the subject of policy consideration would be the focus of the triennial during stage 1.

Areas in scope:

- Organisational structure of the IPCC - options which consider alternative delivery models within the IPCC (the police integrity consultation will provide evidence in relation to this question in particular and the responses will feed in to the review)

- Legal status and classification of the IPCC - consideration of different models of public body status, for example: NDPB; public corporation; ombudsman model.
- Consideration of partnership working and alignment with other bodies.

Areas out of scope:

- The key functions of the IPCC and the need for these functions to continue
- The continuing need for the IPCC - and therefore any delivery options which involve abolishing the IPCC or merging it with another body
- Three tests - given there is already clarity that the IPCC's functions are based on technical expertise, require absolute political impartiality and independence of ministers
- Any wider aspects of the policy relating to the complaints system

Stage 2 will review whether adequate control and governance arrangements are in place to ensure the IPCC is complying with recognised principles of good corporate governance will include an assessment of IPCC performance and its capacity for delivering more effectively and efficiently.

REVIEW APPROACH AND METHODOLOGY

The review will be conducted on behalf of the Secretary of State by Amobi Modu who is independent of the body and the sponsorship function.

Oversight and challenge will be provided by a Challenge Group. A challenge function is part of the assurance process to ensure informed decisions by the Secretary of State for the Home Department, who has commissioned the Review.

The role of the challenge function is to rigorously and robustly challenge the scope, assumptions, methodology and conclusions of the Review and to ensure that the six principles for the appropriate conduct of triennial reviews, as set out in Cabinet Office Guidance, are followed. These state that triennial reviews should be proportionate, timely, challenging, inclusive, transparent and offer value for money.

Members of the Challenge Group are appointed in their personal capacity and not to represent any interest group. Members of the group are independent of the IPCC and its sponsorship chain within the Home Office, although representatives of the sponsor team and of the IPCC may attend as observers, or to provide evidence to the Challenge Group.

The Challenge Group is expected to meet at least three times (at the beginning, mid-point and end of the review). Proposed members of the challenge group are:

- Sue Langley - Non Executive Director, Home Office Supervisory Board
- Tom Winsor - Her Majesty's Chief Inspector of Constabulary
- Julia Mulligan - North Yorkshire Police & Crime Commissioner and Chair of the APCC Standing Committee on Transparency
- Chief Constable – Jacqui Cheer
- Mark Castle - Chief Executive, Victim Support
- Dr Jane Martin - Local Government Ombudsman
- Michael Fuller - Her Majesty's Chief Inspector, HMCPSI
- Paula McDonald - Deputy Director, Public Bodies Reform, Cabinet Office
- Ben Foyle - Home Office Public Bodies Team

Triennial reviews are normally conducted in two distinct stages as per the Cabinet Office guidance on Triennial Reviews. For this review, to eliminate the requirement to seek two lots of information from some stakeholders and limit duplication, elements of stages 1 and 2 can be conducted simultaneously and include (although not limited to):

- A review of the findings from earlier policy reviews;
- A review of documents including, but not restricted to, annual reports, published reports, relevant statute, terms of reference for the IPCC;
- Written request for comments from the Home Affairs Select Committee;
- Evidence of public views;
- Meetings/teleconferencing with a number of external partners and interested parties; and
- Discussions between the review team and the Chair / CEO of the IPCC to cover any issues emerging from meeting sponsors, and any advice the Chair might have on challenges and risks to the effectiveness of the IPCC.

Emerging findings will be discussed with the sponsorship team during the course of the review and with the Cabinet Office's Public Bodies Reform Team.

The Chair and Chief Executive of the IPCC, and the Home Office sponsorship team will have the opportunity to check the factual accuracy of the review report at draft stage and the Cabinet Office will be invited to provide comments.

If during stage 1, sufficient information is not elicited to meet the requirements of stage 2, the second stage can include:

- A meeting of the reviewer, senior sponsor and head of secretariat to discuss and inform an assessment of compliance;
- An assessment of the IPCC's capacity for delivering more effectively and efficiently, including identifying potential for efficiency savings and their ability to contribute to economic growth; and
- Further discussions with the Chair / CEO of the IPCC to cover any issues emerging from meeting sponsors and any advice the Chair might have on challenges and risks to the effectiveness of the IPCC.

Again the Chair and Chief Executive of the IPCC, and the Home Office sponsorship team will have the opportunity to check the factual accuracy of the review report at draft stage and the Cabinet Office will be invited to provide comments.

INTERESTED PARTIES

The following will be consulted as part of the review and will be asked to agree the review before it is published:

- Permanent Secretary;
- The Home Secretary;
- Minister of State for Policing, Criminal Justice and Victims, Home Office;
- The Rt. Hon. Francis Maude MP, Minister for the Cabinet Office and Paymaster General;
- Cabinet Office's Public Bodies Reform Team; and
- Challenge Group.

The Review will also consult (although not limited to):

- Victims Representatives and other relevant bodies representing the public ☐ The Police and other criminal justice agencies

- Criminal Justice inspectorates
- Ombudsmen and other bodies with similar roles to that of IPCC (including Parliamentary & Health Service Ombudsman)
- College of Policing
- Associations and other channels through which the opinion of solicitors, barristers, magistrates and judges might be sought

A semi-structured questionnaire/topic-guide will be developed for the reviewer to use in interviews with key stakeholders. In addition, responses to the complaints / disciplinary system consultation will be reviewed for the triennial review.

MAJOR DELIVERABLES

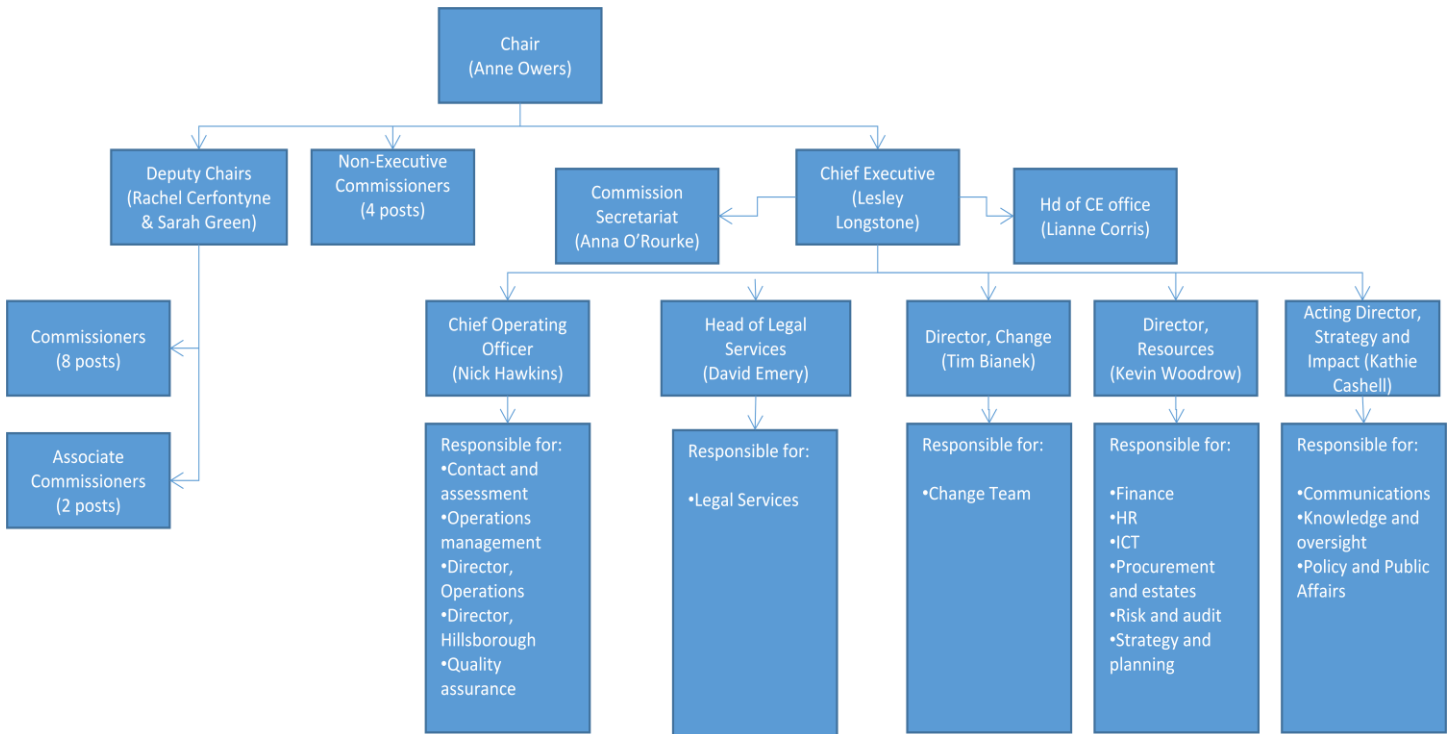
- Written Ministerial Statement
- Interviews with key stakeholders
- Final Report

ANNEX 3 - MEMBERSHIP OF CHALLENGE GROUP

The review team and I are grateful to the following who so generously gave of their time, expertise and wisdom:

1. **Sue Langley** - Non Executive Director, Home Office Supervisory Board
2. **Tom Winsor** - Her Majesty's Chief Inspector of Constabulary
3. **Julia Muligan** - North Yorkshire Police & Crime Commissioner and Chair of the APCC Standing Committee on Transparency
4. **Mark Castle** - Chief Executive, Victim Support
5. **Dr Jane Martin** - Local Government Ombudsman
6. **Michael Fuller** - Her Majesty's Chief Inspector, HMCPSI
7. **Paula McDonald** - Deputy Director, Public Bodies Reform, Cabinet Office
8. **Ben Foyle** - Home Office Public Bodies Team

ANNEX 4 – IPCC ORGANISATION CHART



ANNEX 5 – COLLECTION OF EVIDENCE

The review team and I had access to the responses to the Home Office public consultation on Police Integrity (including police complaints) as well as recent work by the Home Office on police discipline (Chip Chapman review), and police complaints. I also conducted interviews during January and February with IPCC commissioners and staff, various stakeholders with relevant experience of the complaints system including police leaders and professional standards staff, representatives of complainants, lawyers and academics.

LIST OF INTERVIEWEES / DISCUSSIONS

IPCC	Stakeholders / Others
<ul style="list-style-type: none"> • Dame Anne Owers – IPCC Chair 	<ul style="list-style-type: none"> • Graham Smith – Manchester University
<ul style="list-style-type: none"> • Rachel Cerfontyne – IPCC Deputy Chair 	<ul style="list-style-type: none"> • Jacqui Cheer – Chief Constable Cleveland Police and Portfolio lead Police Complaints
<ul style="list-style-type: none"> • Sarah Green – IPCC Deputy Chair 	<ul style="list-style-type: none"> • Richie Jones – Police Federation
<ul style="list-style-type: none"> • David Bird – IPCC Non-Exec 	<ul style="list-style-type: none"> • Ed Hammond – Centre for Public scrutiny
<ul style="list-style-type: none"> • Lesley Longstone – IPCC CEO 	<ul style="list-style-type: none"> • Lord Victor Adebowale – CEO Turning Point, led a major review for the MPS on Police handling of mental health
<ul style="list-style-type: none"> • Nick Hawkins – IPCC COO 	<ul style="list-style-type: none"> • Sara Thornton – Chief Constable, Thames Valley Police
<ul style="list-style-type: none"> • Kathie Cashell – IPCC Policy 	<ul style="list-style-type: none"> • Raju Bhatt – Solicitor
<ul style="list-style-type: none"> • David Emery – IPCC Legal 	<ul style="list-style-type: none"> • Alaric Botherton, Commander, Metropolitan Police Service Professional Standards Department
<ul style="list-style-type: none"> • Tim Bianek – IPCC Change Director 	<ul style="list-style-type: none"> • John Beggs QC – Barrister
<ul style="list-style-type: none"> • Kevin Woodrow – IPCC Director of Resources 	<ul style="list-style-type: none"> • Rob Beckley – COO, College of Policing
	<ul style="list-style-type: none"> • Peter Makeham – Consultant
Triennial Review Challenge Group	<ul style="list-style-type: none"> • Jonathan Timbers – Equality and Human Rights Commission
<ul style="list-style-type: none"> • Sue Langley – Non Exec, Home Office Supervisory Board 	<ul style="list-style-type: none"> • Nick Hardwick – Chief Inspector of Prisons
<ul style="list-style-type: none"> • Sir Tom Winsor – HMCIC 	<ul style="list-style-type: none"> • Penny Fitzsimmons – Home Office, Internal Audit
<ul style="list-style-type: none"> • Mark Castle – CEO, Victim Support 	<ul style="list-style-type: none"> • Keith Towler – the then Children’s Commissioner for Wales
<ul style="list-style-type: none"> • Mike Fuller – Chief Inspector CPS Inspectorate 	<ul style="list-style-type: none"> • Russell Barr, Director of Investigations and Philip Mende, Senior Policy and Insight Officer (Parliamentary), Office of the Parliamentary and Health Ombudsman
<ul style="list-style-type: none"> • PCC Julia Mulligan – APCC 	
<ul style="list-style-type: none"> • Jane Martin – Local Government Ombudsman 	Discussion Groups
<ul style="list-style-type: none"> • Paula McDonald – Cabinet Office 	<ul style="list-style-type: none"> • National Policing Complaints & Misconduct Group
<ul style="list-style-type: none"> • Ben Foyle – Home Office 	<ul style="list-style-type: none"> • Metropolitan Police Service Professional Standards Department
	<ul style="list-style-type: none"> • Durham Police

ANNEX 6 - IPCC COMPLIANCE - CABINET OFFICE ADMINISTRATIVE REQUIREMENTS

The IPCC was asked to self-assess compliance with Cabinet Office requirements. Detailed responses from the Commission are set out below

Principle	Supporting provisions	Compliant?
<u>Statutory Accountability</u>		
The public body complies with all applicable statutes and regulations, and other relevant statements of best practice.	<ul style="list-style-type: none"> The public body must comply with all statutory and administrative requirements on the use of public funds. This includes the principles and policies set out in the HMT publication “Managing Public Money” and Cabinet Office/HM Treasury spending controls. 	Yes¹⁷
	<ul style="list-style-type: none"> The public body must operate within the limits of its statutory authority and in accordance with any delegated authorities agreed with the sponsoring department. 	Yes
	<ul style="list-style-type: none"> The public body must be compliant with Data Protection legislation. 	Yes
	<ul style="list-style-type: none"> The public body should be subject to the Public Records Acts 1958 and 1967. 	No
<u>Accountability for Public Money</u>		
The Accounting Officer of the public body is personally responsible and accountable to Parliament for the use of public money by the body and for the stewardship of assets.	<ul style="list-style-type: none"> There should be a formally designated Accounting Officer for the public body. This is usually the most senior official (normally the Chief Executive). 	Yes

¹⁷ New delegation letters making these requirements more explicit have now been issued by the AO and advice from the sponsor team is currently being sought on the scope of the recruitment requirements.

Principle	Supporting provisions	Compliant?
	<ul style="list-style-type: none"> The role, responsibilities and accountability of the Accounting Officer should be clearly defined and understood. The Accounting Officer should have received appropriate training and induction. The public body should be compliant with the requirements set out in “Managing Public Money”, relevant Dear Accounting Officer letters and other directions. In particular, the Accounting Officer of the NDPB has a responsibility to provide evidence-based assurances required by the Principal Accounting Officer (PAO). The PAO requires these to satisfy him or herself that the Accounting Office responsibilities are being appropriately discharged. This includes, without reservation, appropriate access of the PAO’s internal audit service into the NDPB. 	Yes
	<ul style="list-style-type: none"> The public body should establish appropriate arrangements to ensure that public funds: <ul style="list-style-type: none"> are properly safeguarded; used economically, efficiently and effectively; used in accordance with the statutory or other authorities that govern their use; and deliver value for money for the Exchequer as a whole. 	Yes
	<ul style="list-style-type: none"> The public body’s annual accounts should be laid before Parliament. The Comptroller and Auditor General should be the external auditor for the body. 	Yes
<u>Ministerial Accountability</u>		
The Minister is ultimately accountable to Parliament and the public for the overall performance of the public body.	<ul style="list-style-type: none"> The Minister and sponsoring department should exercise appropriate scrutiny and oversight of the public body. 	
	<ul style="list-style-type: none"> Appointments to the board should be made in line with any statutory requirements and, where appropriate, with the Code of Practice issued by the Commissioner for Public Appointments. 	Yes
	<ul style="list-style-type: none"> The Minister will normally appoint the Chair and all non-executive board members of the public body and be able to remove individuals whose performance or conduct is unsatisfactory. 	Yes
	<ul style="list-style-type: none"> The Minister should be consulted on the appointment of the Chief Executive and will normally approve the terms and conditions of employment (Where the Chief Executive will also be Accounting Officer for the public body, the Principal Accounting Officer in the sponsor Department (usually the Permanent Secretary) should also be consulted). 	
	<ul style="list-style-type: none"> The Minister should meet the Chair and/or Chief Executive on a regular basis. 	Yes

Principle	Supporting provisions	Compliant?
	<ul style="list-style-type: none"> • A range of appropriate controls and safeguards should be in place to ensure that the Minister is consulted on key issues and can be properly held to account. These will normally include: <ul style="list-style-type: none"> ○ a requirement for the public body to consult the Minister on the corporate and/or operational business plan; ○ a requirement for the exercise of particular functions to be subject to guidance or approval from the Minister; ○ a general or specific power of Ministerial direction over the public body; ○ a requirement for the Minister to be consulted by the public body on key financial decisions. This should include proposals by the public body to: (i) acquire or dispose of land, property or other assets; (ii) form subsidiary companies or bodies corporate; and (iii) borrow money; and ○ a power to require the production of information from the public body which is needed to answer satisfactorily for the body’s affairs. • There should be a requirement to inform Parliament of the activities of the public body through publication of an annual report. 	<p>Yes</p> <p>Yes</p> <p>Yes¹⁸</p> <p>N/A</p> <p>Yes</p> <p>Yes</p> <p>Yes</p>
<p><u>ROLES AND RESPONSIBILITIES - Role of the Sponsoring Department</u></p>		
<p>The departmental board ensures that there are robust governance arrangements with the board of each arm’s length body. These arrangements set out the terms of their relationship and explain how they will be put in place to promote</p>	<ul style="list-style-type: none"> • The departmental board’s regular agenda should include scrutiny of the performance of the public body. The departmental board should establish appropriate systems and processes to ensure that there are effective arrangements in place for governance, risk management and internal control in the public body. • There should be a Framework Document in place which sets out clearly the aims, objectives and functions of the public body and the respective roles and responsibilities of the Minister, the sponsoring department and the public body. This should follow relevant Cabinet Office and HM Treasury guidance. The Framework Document should be published. It should be accessible and understood by the sponsoring department, all board members and by the senior management team in the public body. It should be regularly reviewed and updated. • There should be a dedicated sponsor team within the parent department. The role of the sponsor team should be clearly defined. 	<p>Not fully</p> <p>Not fully¹⁹</p> <p>Yes</p>

¹⁸ Home Office to provide further detail on Ministerial requirements to enable the production of statutory guidance

¹⁹ Revised framework document shortly to be issued by Home Office

Principle	Supporting provisions	Compliant?
<p>high performance and safeguard propriety and regularity. There is a sponsor team within the department that provides appropriate oversight and scrutiny of, and support and assistance to, the public body.</p>	<ul style="list-style-type: none"> • There should be regular and ongoing dialogue between the sponsoring department and the public body. Senior officials from the sponsoring department may as appropriate attend board and/or committee meetings. There might also be regular meetings between relevant professionals in the sponsoring department and the public body. 	<p>Yes</p>
<p><u>ROLES AND RESPONSIBILITIES - Role of the Board</u></p>		
<p>The public body is led by an effective board which has collective responsibility for the overall performance and success of the body. The board provides strategic leadership, direction, support and guidance. The board - and its committees - have an appropriate balance of skills, experience, independence and knowledge. There is a clear division of roles and responsibilities between non-executive and executives. No one</p>	<ul style="list-style-type: none"> • The board of the public body should: <ul style="list-style-type: none"> ○ meet regularly; 	<p>Yes</p>
	<ul style="list-style-type: none"> ○ retain effective control over the body; and 	<p>Yes</p>
	<ul style="list-style-type: none"> ○ effectively monitor the senior management team. 	<p>Yes</p>
	<ul style="list-style-type: none"> • The size of the board should be appropriate. 	<p>Yes</p>
	<ul style="list-style-type: none"> • Board members should be drawn from a wide range of diverse backgrounds. 	<p>Yes</p>
	<ul style="list-style-type: none"> • The board should establish a framework of strategic control (or scheme of delegated or reserved powers). This should specify which matters are specifically reserved for the collective decision of the board. This framework must be understood by all board members and by the senior management team. It should be regularly reviewed and refreshed. 	<p>Yes</p>
	<ul style="list-style-type: none"> • The Board should establish formal procedural and financial regulations to govern the conduct of its business. 	<p>Yes</p>
	<ul style="list-style-type: none"> • The Board should establish appropriate arrangements to ensure that it has access to all such relevant information, advice and resources as is necessary to enable it to carry out its role effectively. 	<p>Yes</p>
	<ul style="list-style-type: none"> • The Board should make a senior executive responsible for ensuring that appropriate advice is given to it on all financial matters. 	<p>Yes</p>
<ul style="list-style-type: none"> • The Board should make a senior executive responsible for ensuring that Board procedures are followed and that all applicable statutes and regulations and other relevant statements of best practice are complied with. 	<p>Yes</p>	

Principle	Supporting provisions	Compliant?
individual has unchallenged decision-making powers.	<ul style="list-style-type: none"> The Board should establish a remuneration committee to make recommendations on the remuneration of top executives²⁵. Information on senior salaries should be published. The board should ensure that the body's rules for recruitment and management of staff provide for appointment and advancement on merit. 	Yes
	<ul style="list-style-type: none"> The Chief Executive should be accountable to the Board for the ultimate performance of the public body and for the implementation of the Board's policies. He or she should be responsible for the day-to-day management of the public body and should have line responsibility for all aspects of executive management. 	No²⁰
	<ul style="list-style-type: none"> There should be an annual evaluation of the performance of the board and its committees - and of the Chair and individual board members. 	No?
<u>ROLES AND RESPONSIBILITIES - Role of the Chair</u>		
The Chair is responsible for leadership of the board and for ensuring its overall effectiveness. Note: The sponsoring department is responsible for assessing the performance of the Chair. The Chair is responsible for assessing the performance of non-executive board members.	<ul style="list-style-type: none"> The board should be led by a non-executive Chair. 	Yes
	<ul style="list-style-type: none"> There should be a formal, rigorous and transparent process for the appointment of the Chair. This should be compliant with the Code of Practice issued by the Commissioner for Public Appointments. The Chair should have a clearly defined role in the appointment of non-executive board members. 	Yes
	<ul style="list-style-type: none"> The duties, role and responsibilities, terms of office and remuneration of the Chair should be set out clearly and formally defined in writing. Terms and conditions must be in line with Cabinet Office guidance and with any statutory requirements. The responsibilities of the Chair will normally include: <ul style="list-style-type: none"> representing the public body in discussions with Ministers; 	Yes
	<ul style="list-style-type: none"> <ul style="list-style-type: none"> advising the sponsoring Department and Ministers about board appointments and the performance of individual non-executive board members; 	Yes
	<ul style="list-style-type: none"> <ul style="list-style-type: none"> ensuring that non-executive board members have a proper knowledge and understanding of their corporate role and responsibilities. The Chair should ensure that new members undergo a proper induction process and is normally responsible for undertaking an annual assessment of non-executive board members' performance; 	Yes
	<ul style="list-style-type: none"> <ul style="list-style-type: none"> ensuring that the board, in reaching decisions, takes proper account of guidance provided by the sponsoring department or Ministers; 	Yes²¹

²⁰ A number of day to day decisions are taken by Commissioners and two members of the Executive (Associate Commissioners) who are directly managed by Commissioners

²¹ Yes with respect to those decisions that are rightly within scope eg property controls, but most decisions including all case related decisions are taken independently of Ministers

Principle	Supporting provisions	Compliant?
	<ul style="list-style-type: none"> ○ ensuring that the board carries out its business efficiently and effectively; representing the views of the board to the general public; and developing an effective working relationship with the Chief Executive and other senior staff. 	Yes²²
	<ul style="list-style-type: none"> ● The roles of Chair and Chief Executive should be held by different individuals. 	Yes
<u>ROLES AND RESPONSIBILITIES - Role of Non-Executive Board Members</u>		
As part of their role, non-executive board members provide independent and constructive challenge.	<ul style="list-style-type: none"> ● There should be a majority of non-executive members on the board. 	No
	<ul style="list-style-type: none"> ● There should be a formal, rigorous and transparent process for the appointment of non-executive members of the board. This should be compliant with the Code of Practice issued by the Commissioner for Public Appointments 	
	<ul style="list-style-type: none"> ● The duties, role and responsibilities, terms of office and remuneration of non-executive board members should be set out clearly and formally defined in writing. Terms and conditions must be in line with Cabinet Office guidance³⁰ and with any statutory requirements. The corporate responsibilities of non-executive board members (including the Chair) will normally include: 	Yes
	<ul style="list-style-type: none"> ○ establishing the strategic direction of the public body (within a policy and resources framework agreed with Ministers); 	Yes
	<ul style="list-style-type: none"> ○ overseeing the development and implementation of strategies, plans and priorities 	Yes
	<ul style="list-style-type: none"> ○ overseeing the development and review of key performance targets, including financial targets; 	Yes
	<ul style="list-style-type: none"> ○ -ensuring that the public body complies with all statutory and administrative requirements on the use of public funds; 	Yes
	<ul style="list-style-type: none"> ○ ensuring that the board operates within the limits of its statutory authority and any delegated authority agreed with the sponsoring department; 	Yes
<ul style="list-style-type: none"> ○ ensuring that high standards of corporate governance are observed at all times. This should include ensuring that the public body operates in an open, accountable and responsive way; and representing the board at meetings and events as required. 	Yes	

²² Significant reforms and restructuring are underway clearly led by the Chair

Principle	Supporting provisions	Compliant?
	<ul style="list-style-type: none"> All non-executive Board members must be properly independent of management. 	No ²³
	<ul style="list-style-type: none"> All non-executive board members must allocate sufficient time to the board to discharge their responsibilities effectively. Details of board attendance should be published (with an accompanying narrative as appropriate). 	Yes
	<ul style="list-style-type: none"> There should be a proper induction process for new board members. This should be led by the Chair. There should be regular reviews by the Chair of individual members’ training and development needs. 	Yes
<u>EFFECTIVE FINANCIAL MANAGEMENT</u>		
The public body has taken appropriate steps to ensure that effective systems of financial management and internal control are in place.	<p><u>Annual Reporting</u></p> <ul style="list-style-type: none"> The body must publish on a timely basis an objective, balanced and understandable annual report. The report must comply with HM Treasury guidance. 	Yes
	<p><u>Internal Controls</u></p> <ul style="list-style-type: none"> The public body must have taken steps to ensure that effective systems of risk management are established as part of the systems of internal control. 	Yes
	<ul style="list-style-type: none"> The public body must have taken steps to ensure that an effective internal audit function is established as part of the systems of internal control. This should operate to Government Internal Audit Standards and in accordance with Cabinet Office guidance 	Yes
	<ul style="list-style-type: none"> There must be appropriate financial delegations in place. These should be understood by the sponsoring department, by board members, by the senior management team and by relevant staff across the public body. Effective systems should be in place to ensure compliance with these delegations. These should be regularly reviewed. 	Yes
	<ul style="list-style-type: none"> There must be effective anti-fraud and anti-corruption measures in place. 	Yes
	<ul style="list-style-type: none"> There must be clear rules in place governing the claiming of expenses. These should be published. Effective systems should be in place to ensure compliance with these rules. The public body should proactively publish information on expenses claimed by board members and senior staff. 	Yes
	<ul style="list-style-type: none"> The annual report should include a statement on the effectiveness of the body’s systems of internal control. 	Yes

²³ The Non-Executive Chair has line management responsibility for the work of Operational Commissioners, via the two Deputy Chairs and the two deputies line manage two members of staff (Associate Commissioners).

Principle	Supporting provisions	Compliant?
	<p><u>Audit Committee</u></p> <ul style="list-style-type: none"> The board should establish an audit (or audit and risk) committee with responsibility for the independent review of the systems of internal control and of the external audit process. 	Yes
	<p><u>External Auditors</u></p> <ul style="list-style-type: none"> The body should have taken steps to ensure that an objective and professional relationship is maintained with the external auditors. 	Yes
<u>COMMUNICATIONS</u>		
The Public Body is open, transparent, accountable and responsive.	<p><u>Communications with Stakeholders</u></p> <ul style="list-style-type: none"> The public body should have identified its key stakeholders. It should establish clear and effective channels of communication with these stakeholders. 	Yes
	<p><u>Communications with the Public</u></p> <ul style="list-style-type: none"> The public body should make an explicit commitment to openness in all its activities. It should engage and consult with the public on issues of real public interest or concern. This might be via new media. It should publish details of senior staff and boards members together with appropriate contact details. 	Yes
	<ul style="list-style-type: none"> The public body should consider holding open board meetings or an annual open meeting. 	Yes
	<ul style="list-style-type: none"> The public body should proactively publish agendas and minutes of board meetings. 	Yes
	<ul style="list-style-type: none"> The public body should proactively publish performance data. 	Yes
	<ul style="list-style-type: none"> In accordance with transparency best practice, public bodies should consider publishing their spend data over £500. By regularly publishing such data and by opening their books for public scrutiny, public bodies can demonstrate their commitment to openness and transparency and to making themselves more accountable to the public. 	No
	<ul style="list-style-type: none"> The public body should establish effective correspondence handling and complaint procedures. These should make it simple for members of the public to contact the public body and to make complaints. Complaints should be taken seriously. Where appropriate, complaints should be subject to investigation by the Parliamentary Ombudsman³³. The public body should monitor and report on its performance in handling correspondence. 	Yes
	<p><u>Marketing and PR</u></p> <ul style="list-style-type: none"> The public body must comply with the Government’s conventions on publicity and advertising. (These conventions must be understood by board members, senior managers and all staff in press, communication and marketing teams) 	Yes
	<ul style="list-style-type: none"> Appropriate rules and restrictions must be in place limiting the use of marketing and PR consultants. 	Yes

Principle	Supporting provisions	Compliant?
	<ul style="list-style-type: none"> The public body should put robust and effective systems in place to ensure that the public body is not, and is not perceived to be, engaging in political lobbying. This includes restrictions on board members and staff attending Party Conferences in a professional capacity. 	Yes
<u>CONDUCT AND BEHAVIOUR</u>		
The board and staff of the public body work to the highest personal and professional standards. They promote the values of the public body and of good governance through their conduct and behaviour.	<ul style="list-style-type: none"> A Code of Conduct must be in place setting out the standards of personal and professional behaviour expected of all board members. This should follow the Cabinet Office Code. All members should be aware of the Code. The Code should form part of the terms and conditions of appointment. 	Yes
	<ul style="list-style-type: none"> The public body has adopted a Code of Conduct for staff. This is based on the Cabinet Office model Code. All staff should be aware of the provisions of the Code. The Code should form part of the terms and conditions of employment. 	Yes
	<ul style="list-style-type: none"> There are clear rules and procedures in place for managing conflicts of interest. There is a publicly available Register of Interests for board members and senior staff. This is regularly updated. 	Yes
	<ul style="list-style-type: none"> There are clear rules and guidelines in place on political activity for board members and staff. There are effective systems in place to ensure compliance with any restrictions. 	Yes
	<ul style="list-style-type: none"> There are rules in place for board members and senior staff on the acceptance of appointments or employment after resignation or retirement. These are effectively enforced. 	Yes
	<p><u>Leadership</u></p> <ul style="list-style-type: none"> Board members and senior staff should show leadership by conducting themselves in accordance with the highest standards of personal and professional behaviour and in line with the principles set out in respective Codes of Conduct. 	Yes

ANNEX 7 - IPCC COMPLIANCE - CABINET OFFICE ADMINISTRATIVE AND EFFICIENCY REQUIREMENTS

The IPCC was asked to self-assess compliance with Cabinet Office requirements and to provide detailed information on costs. Detailed responses from the Commission are set out below

Estates - The IPCC estates cover 5 locations all of which are all part of lease break or end planning in 2018/19. The locations are Warrington, High Holborn, Birmingham, Wakefield and Cardiff. Work on the Target Operating Model as well as the resource model and plan for the organisation will determine the number of staff needed in each location and this will inform future estates strategy. The Commission intends to work closely with the Home Office to explore estates options and develop a 5 year estates strategy in order to achieve vfm for the taxpayer

ICT -IPCC staff have recently undertaken intensive work with colleagues from HO and the Cabinet Office on the Commission's ICT contract and have agreed an interim solution to infrastructure requirements through to 2017/18 at which time they expect to have moved to a G Cloud solution. The exit from Steria to G Cloud provides an opportunity to provide more flexibility over service delivery. Indicative financial estimates have been provided to the Home Office.

Heading	Detail	Comment	Compliant ?
Digital by Default	Departments should look at the potential to derive savings from shifting current services to digital channels and transforming transactional services to be digital by default as outlined in the Digital Efficiency Report¹⁵. This should follow the principles set out in the Government Digital Strategy¹⁶ and Departmental Digital Strategies¹⁷ and specifically look at £cost per transaction. All new or redesigned transactions with over 100,000 users will need to meet the Digital By Default Service Standard from April 2014.		
	All new or redesigned transactions with over 100,000 users will need to meet the Digital By Default Service Standard ¹⁸ from April 2014	None of the current services have over 100,000 users. Services delivered directly by the IPCC have fewer than 10,000 users, though there are approximately 35,000 complaints dealt with each year, mostly by the forces concerned.	N/A
	What savings can be made by shifting to digital	The IPCC has introduced some on-line transactions for the public in line with the above strategies and following a successful pilot, has plans to introduce digital transactions for police forces in 2015/16. It will be taking opportunities offered by its current change programme to make further changes in this direction.	N/A

Heading	Detail	Comment	Compliant ?
	<ul style="list-style-type: none"> In what years? 	It is expected that all forces will be using digital transactions by the end of 2015/16. Further changes in this direction and the timing of these are to be developed as part of the IPCC change programme.	N/A
	<ul style="list-style-type: none"> By cost type? (i.e. pay bill, suppliers etc) 	Savings will be made in the cost of processing transactions potentially resulting in pay bill savings for the IPCC and forces.	N/A
	What is the current spend in this area	25 staff work on direct complaints providing a service be it digital, telephone, or paper based. Of these 10 are processing digital transactions at any one time, others are dealing with telephone and paper. The 10 staff cost approximately £273,000 per annum.	N/A
	What does the channel mix (digital, telephone, face-to-face etc) look like now, and what plans are there to shift to digital What will the spend be after transformation?	<ul style="list-style-type: none"> Online forms for the public are available on our website. Members of the public can complete the forms on-line or save a word version and submit via email. Current ratio is 60:40 to digital either on-line or email. We appear to have reached a plateau and will be giving further thought to how we can encourage a further shift to digital. Our Customer Contact Centre is main point of telephone contact. They advise complainants to complete forms online where possible. There are currently no face-to-face meetings with complainants in relation to appeals or direct complaints work. Our digital channel 'e-referrals' delivered during 2015/16 will ensure that all referral documentation police forces submit to us, over 3000 documents per annum, will be using an online process creating efficiencies for our contact centre and for police forces. 	N/A
	When will savings start to be realised?	Efficiencies and potential savings will start to be will be delivered from April 2016. However, the key driver for these changes is improving the service that we offer and improving data quality by reducing errors.	N/A
	What will be the reduction in average cost per transaction?	The average reduction will be £1.27 per transaction based on 3,000 transactions	N/A
Property	<i>Departments should consider the size of the office estate occupied by the body, and consider how savings may be derived from lease breaks or consolidation</i>		

Heading	Detail	Comment	Compliant ?
	What is the gross annual running cost of the estate of the body?	Total Rent – £2,552,619 Total Rent and service charge - £3,699,500	N/A
	How many square metres does the body occupy and how many people (FTEs including contractors) currently occupy it?	5777.62 sq m total area and 787 total staff (equates to 7.34 sqm per person, well within the Government's. Workplace standard)	Compliant
	Will the NDPB meet the Government's workplace standard by 2015, which comprises: 10m ² or less per FTE overall; and adoption of flexible working (such as hot-desking)?	Yes. The IPCC is already compliant with an overall 7.34 sqm per FTE and hot desking to an 8:10 ratio already adopted across the estate.	Compliant
	Are there any major estate changes planned e.g. freehold sales, PFI hand backs, leasehold exits, MOTOS, acquisitions, refurbishments, workplace transformation, moves, asset management, FM procurement?	Upcoming events are the acquisition of a new property in Croydon, already on the public sector estates, and a lease break in Sale, Manchester. A business case has been drafted for the Sale property and will be discussed with Govt. Property Unit. The IPCC engage fully with HOPG and GPU for necessary approvals on all projects.	Yes
	Departments should consider the size of the office estate occupied by the body, and consider how savings may be derived from lease breaks or consolidation.	We have engaged professional property advisors (DTZ) to assist us with getting best value from the estates portfolio. They work with us to ensure we achieve saving from property events, moving to public sector property wherever possible.	Yes
Shared Services	<i>The Next Generation Shared Services (NGSS) programme will deliver efficiencies in Government's back office transactional costs including Finance, HR, Payroll and Procurement. Departments should consider whether separate back office functions are needed and cost effective. Departments should make the case for why their NDPBs are not delivering these functions through shared services in their review</i>		
	Is there a business need for the IPCC to operate a full in-house back office function?	As the IPCC expands the business need for a full in-house back office function will require further evaluation. The expected growth in transactional volumes may make it cost effective to transfer some activities to shared services and this will be explored as part of the change programme.	N/A

Heading	Detail	Comment	Compliant ?
	What drivers could support a change i.e. software upgrade, efficiency savings, contract renewal?	The target operating model may identify opportunities to outsource functions from 2016. The Steria contract (ICT) ending in Dec 19 and the contract exit process provides an opportunity from 2016 to consider if the IPCC should move to different delivery models.	N/A
	What support would be needed to initiate a change?	Support from the Home Office on shared service options and business cases for transformation costs.	N/A
	How cost effectively they currently deliver their back office function?	Discussion with Home Office at the time of planning the expansion funding showed back office staff ratios were within government guidelines. The IPCC is planning further work to benchmark back office functions to ensure these are efficient and cost effective.	Yes
	What cost savings and other benefits could be gained a back office transformation?	There are potential benefits in improving efficiency and lowering costs depending on the results of work to develop the target operating model.	N/A
	What potential drivers there are for change?	Where there are opportunities for quality improvements or efficiency	N/A
Procurement	<i>Departments should consider the volume of spend from the body that currently goes through centralised procurement arrangements, and what savings could be made by further centralising all spend on common goods and services. Savings might derive from achieving lower prices and/or demand management. There would also be an expectation of a reduction in overheads (e.g. workforce reductions) as a result of shifting spend to centralised arrangements</i>		
	How much will the body spend on common goods and services?	£6.3 million	N/A
	To what extent is the body complying with the central government mandate that all common goods and services will be channelled through centralised arrangements?	100% of common goods/services purchases are channelled through centralised arrangements.	Compliant
	What proportion of spend on common goods and services is outside of centralised arrangements and what is the justification for this?	Nil	Compliant

Heading	Detail	Comment	Compliant ?
Commercial Relationships	Departments should consider what opportunities there are to lower the cost of the commercial contracts held by the body and what options there might be to reduce and restructure these costs by renegotiating contracts		
	What contracts with a total contract value of £5m or more are held by the body or by the Dept., on their behalf (by total contract value, annual value, start and expiry date, and supplier)?	The Steria ICT contract is over £40m over a 10 year period ending in December 2019 with a break point in December 2017 and December 2018.	N/A
	What opportunities will there be to renegotiate major contracts still in force for between 2014 and 2017?	Substantial analysis has been undertaken with HO PIC and Government Digital Services to assess options for an early break before December 17. We are now working to an interim solution to our enhanced infrastructure requirements, arising from the expansion, and have agreed with GDS and PIC an exit strategy to a G-Cloud solution in incremental steps. We expect this to lead to improved ICT performance and greater flexibility.	N/A
	What major procurements with a total project contract value of £5m or more will be conducted during 2014-17?	ICT change may exceed £5m but this is already under PIC and GDS review	N/A
Cabinet Office Spending Controls	Unless agreed with the Cabinet Office by exception, the Cabinet Office controls cover NDPBs. Any IPCC expenditure commitment in the following area requires approval. Is the IPCC compliant with Cabinet Office controls over the following:		
	<ul style="list-style-type: none"> Advertising and marketing and communications; 	IPCC complies with controls. Expenditure does not normally exceed the £100k threshold. Expenditure relating to recruitment advertising is approved by the Home Office.	Compliant
	<ul style="list-style-type: none"> Strategic Supplier Management, including disputes; 	The IPCC uses a number of strategic suppliers and complies with the relevant controls. No back office expenditure exceeds the £1M threshold. Only the Steria contract exceeds the £5M threshold for technology expenditure and we work with Home Office and Government Digital Service on contract changes	Compliant
	<ul style="list-style-type: none"> Commercial models; 	We are not involved in commercial models	N/A
	<ul style="list-style-type: none"> Digital/Technology 	As part of our planned exit from the Steria contract we are working with Home Office and Government Digital Service on options.	Compliant
	<ul style="list-style-type: none"> External Recruitment; 	To ensure full compliance we need to review and update our agreement with HO on this matter, in particular to clarify which posts are classed as front line. Quarterly forecasts are provided as required by the controls.	Partial Compliance

Heading	Detail	Comment	Compliant ?
	<ul style="list-style-type: none"> Consultancy; 	<p>IPCC complies with controls for expenditure on consultants which is approved by Home Office and Cabinet Office as required.</p> <p>Controls over contingent labour are in the process of being revised to ensure full compliance.</p>	Partial Compliance
	<ul style="list-style-type: none"> Redundancy and Compensation; 	<p>The IPCC complies with HO and Cabinet controls for termination agreements and scheme payments.</p>	Compliant
	<ul style="list-style-type: none"> Learning and Development; and 	<p>Most training expenditure is specifically for operational staff undertaking investigations and generic training is provided from existing contracts running to March 2016. Under these arrangements we are compliant. Through 2015/16 we will consider greater use of Civil Service Learning, establish new contracts and continue to ensure compliance with the controls.</p>	Compliant
	<ul style="list-style-type: none"> Property. 	<p>IPCC complies with the controls for all property transactions including facilities management contracts</p>	Compliant
	<p>List the body's five biggest business cases that will be subject to Spending Controls for 2014/15-2016/17</p>	<ol style="list-style-type: none"> £1m North West Office – business case with HOPG £28M (in 15/16) IPCC expansion is already being closely monitored by HO. £23m (14/15 to 16/17) interim solution to ICT infrastructure exit has already been approved by PIC 	N/A

ISBN: 978-1-78246-786-1