



POLICE COMPLAINTS COMMISSIONER FOR SCOTLAND

Corporate objectives 2008-11

Business plan 2008-09

PCCS Corporate plan 2008-2011

	Page
Mission	3
1. Introduction	4
2. Performance review 2007/08	5
Set-up	
Working relationships	
3. Key internal performance targets	6
4. Key objectives 2008-09 to 2010-11	7
Plans against key objectives	
5. The challenges ahead	10
People	
Estimated budgets	
6. PCCS business plan 2008-09	12
7. PCCS Risk register	16

POLICE COMPLAINTS COMMISSIONER FOR SCOTLAND

MISSION

- To carry out independent reviews of the handling of complaints about police forces, police authorities and policing agencies
- To support police forces, police authorities and policing agencies in Scotland to develop their complaint handling systems so that Scotland is recognised as a world leader in this area
- To carry out our statutory functions with integrity, impartiality, objectivity and transparency, providing accessibility for all
- To secure continuous improvement in our performance while maintaining an appropriate balance between quality and cost

1. INTRODUCTION

This is the corporate plan for the Police Complaints Commissioner for Scotland, and sets out:

- An overview of the Commissioner's work in the first full year of his appointment.
- The Commissioner's key objectives and associated key performance targets for the years 2008/09 to 2010/11 and his strategy for achieving those objectives, including an indication of plans for handling uncertainty.

The role of the Police Complaints Commissioner for Scotland was established by the Police, Public Order and Criminal Justice (Scotland) Act 2006. He assumed his powers under this Act on 1 April 2007.

The Act lays out three broad areas of responsibility for the PCCS:

- Conducting complaint handling reviews of how relevant police forces, police authorities and policing agencies have handled complaints, where the complainer remains dissatisfied;
- Ensuring that police forces, police authorities and policing agencies have suitable procedures in place for handling complaints and making recommendations for their amendment when appropriate; and
- Preparing annual reports for Ministers, and other reports as deemed necessary.

The Cabinet Secretary for Justice, Kenny MacAskill, set out his priorities for law and order to the Scottish Parliament on 6 June 2007, including stating that 'we need to help our police forces work smarter and more efficiently to meet the complex challenges of modern policing - by cutting bureaucracy, streamlining processes, exploiting new technology and improving accountability.' This corporate plan has been framed within the Scottish Government's overall priorities.

2. PERFORMANCE REVIEW 2007/08

The Commissioner was appointed on 1 January 2007, and assumed powers to review complaints on 1 April. During this period the work of the PCCS was focussed on three main areas:

- the practical issues involved in setting up a new public body;
- devising and developing open, accountable complaint handling procedures for the organisation, and establishing precedents relating to the PCCS's powers; and
- building up good working relationships with a range of key individuals and organisations.

Set-up

As the PCCS is an organisation providing a service to the public accessibility is a key issue. The Commissioner was therefore pleased when previous Ministers confirmed on 23 March 2007 that the PCCS permanent office should be located in Hamilton, with its easy access to major transport routes, including public transport links and major roads. However, following the election in May 2007 our plans for establishing a permanent base for the PCCS were put on hold until it was confirmed by the new administration that we could proceed as planned. The move to our permanent accommodation finally took place on 4 February 2008.

As at 31 March 2008 the PCCS was staffed by a Director, Strategic Business Manager, Chief Case Officer, four Case Officers, Police Liaison Officer and two Administrative Officers. In addition, the Commissioner has convened an Advisory Panel to provide him with an external perspective on his policy decisions.

Complaint handling procedures

As a first step in identifying best practice in complaint handling we reviewed the working practices of analogous organisations such as the Independent Police Complaints Commission in England, the Police Ombudsman for Northern Ireland, Scottish Criminal Case Review Commission and the Risk Management Authority.

Working relationships

The Commissioner and his staff continue to have regular contact with all eight police forces, the SPSA and SCDEA, organisations representing police officers and police staff, including ACPOS, ASPS, the Scottish Police Federation and UNISON, together with a range of other key stakeholders such as the Scottish Information Commissioner, Citizens Advice Scotland and the Scottish Public Services Ombudsman. We have also established working relationships with the eight Scottish police boards and the six UK policing agencies whose operations in Scotland come under the PCCS's jurisdiction as part of the process of developing formal agreements with them. These are:-

- Civil and Nuclear Constabulary
- British Transport Police
- Her Majesty's Revenue and Customs
- Ministry of Defence Police
- Border and Immigration Agency
- Serious Organised Crime Agency

3. KEY INTERNAL PERFORMANCE TARGETS

Standards of service were published on our website in March 2007. These include the following targets:

- to send an initial response to all complainers' letters, e-mails and faxes within 2 days of receipt
- to update complainers on the progress on their complaint at least once every 28 days
- to answer the telephone within 6 rings
- to see visitors within 10 minutes of their appointment time
- to see other visitors within 15 minutes of their arrival
- to pay all invoices not in dispute within 30 days

We are also developing further performance indicators in relation to reviewing complaints. Our initial experience is that the time it takes to resolve an enquiry, or conduct a full complaint handling review, can vary very widely depending on the complexity of a case. Some enquiries can be resolved very quickly, especially where a complainer has not yet been to the relevant police body. Other cases require detailed reviews of police files, operating procedures, and information from other bodies. As a result, individuals' contacts with this office have been handled within timespans varying from a 10 minute telephone conversation to an 11 month long review process.

We therefore monitor our performance on signposting enquiries and concluding full complaint handling reviews separately. Initial targets set for 2008-09 are as follows and will be reviewed in the light of experience:

- 80% of enquiries to be concluded within 1 month
- 80% of full complaint handling reviews to be concluded in 9 months

4. KEY OBJECTIVES 2007-08 TO 2009-10

Objectives 1-4 are included in the PCCS's Management Statement and have been set by Scottish Ministers.

Objective 1

To scrutinise independently the manner in which police organisations deal with complaints from the public they serve.

Objective 2

To ensure that police organisations in Scotland have in place appropriate procedures for handling complaints and that these procedures are followed effectively.

Objective 3

To drive up standards and consistency in the way police complaints are handled across the Scottish Police Service.

Objective 4

To prepare reports for Scottish Ministers about how complaints are being dealt with, both general reports commenting on police organisations as a whole, and specific reports dealing with particular issues which may arise.

Objective 5

To run an efficient and effective organisation in accordance with best practice for Scottish public bodies.

Plans against key objectives

1. To scrutinise independently the manner in which police organisations deal with complaints from the public they serve.

Our priorities in the short-term will be to:

- to further develop the PCCS's processes for reviewing complaints about the police to ensure that they are robust, customer-friendly and stand as an exemplar in terms of service standards
- develop memoranda of understanding with police organisations on the handling of complaints referred to the PCCS
- seek the views of enquirers as to how we can further improve our service

Over the next three years we will also:

- consider international, and other, comparators working towards our aim of Scotland being a world-leader in complaint handling

2. To ensure that police organisations in Scotland have in place appropriate procedures for handling complaints and that these procedures are followed effectively.

Our priorities in the short-term will be to:

- review police organisations' existing complaint handling procedures
- consider whether individual complaints about police organisations have been handled within these procedures

Over the next three years we will also:

- identify any generic issues arising from our reviews of complaints, and support police organisations in amending their complaint handling procedures accordingly

3. To drive up standards and consistency in the way police complaints are handled across the Scottish Police Service.

Our priorities in the short-term will be to:

- identify areas of best practice within police organisations' existing complaint handling practices and encourage a levelling-up to existing best practice

Over the next three years we will also:

- consider practices in other police organisations and other sectors, both in the UK and abroad, with a view to establishing best practice
- make recommendations to police organisations on how best to implement best practice

4. *To prepare reports for Scottish Ministers about how complaints are being dealt with, both general reports commenting on police organisations as a whole, and specific reports dealing with particular issues which may arise.*

Our priorities in the short-term will be to:

- provide Ministers with an annual report on the PCCS's own performance and how police organisations are handling complaints
- publish summary statistics showing the number and nature of complaints received by police organisations

Over the next three years we will also:

- identify any specific issues emerging from our reviews of complaints, conduct root cause analyses and report our findings to Ministers

5. *To run an efficient and effective organisation in accordance with best practice for Scottish public bodies*

Our priorities in the short-term will be to:

- institute a rolling review of all administrative arrangements and contracts to ensure that we continue to obtain best value for the public purse
- introduce a our new complaint handling database, Centurion
- complete recruitment of permanent staff
- further develop the role of the Advisory Panel

Over the next three years we will also:

- continue the rolling review of all administrative arrangements
- seek formal accreditation of our working practices eg Chartermark and liP

5. THE CHALLENGES AHEAD

The PCCS is the first ever independent police complaint handling body in Scotland. There have been particular challenges in handling our earlier cases, where we wished to ensure we did them right, rather than quickly. There is a balance to be struck between thoroughness and timeliness of our considerations and we will review our policies in this area in the light of feedback from individual complainers.

Although in some areas the PCCS has a wider remit than HM Inspectorate of Constabulary (HMIC, the predecessor complaint handling organisation in Scotland) our role is significantly different to that of the Independent Police Complaints Commission (covering England & Wales) and the Police Ombudsman for Northern Ireland, both of whom conduct investigations into complaints, and can also investigate criminal allegations. The PCCS does not have such a role, as in Scotland the investigation of criminal allegations is the responsibility of the Crown Office Procurator Fiscal Service (COPFS): COPFS is also totally independent of the police. There is a continuing challenge here for us to manage the expectations of complainers and we put considerable effort into ensuring that we communicate our role clearly, managing the expectations of those who contact us.

People

We expect staffing costs to make up about 60% of our total expenditure, and direct accommodation costs a further 10%. With staffing costs largely driving the overall size of our budget we need to estimate the likely caseload we will be handling as accurately as possible. In our first year of operation we received 322 complaints and enquiries, in line with our initial estimate of 320 - this compares with the 75 that HMIC used to deal with.

The other main area of work for the PCCS is reviewing complaint handling procedures, which will be driven by the evidence emerging from the complaint handling reviews we conduct.

Estimated budgets

The Scottish Government Justice Directorate allocated £1.5 million grant-in-aid to the PCCS for 2007-08 to cover one-off set-up costs as well as regular running costs. We achieved an underspend against this budget, in part because we secured an 18 month rent-free period up to October 2008 for our new permanent office location, and in part due to our policy of only recruiting staff as the workload increased.

The following table sets out the estimated budget provision required for the three years of this plan:

PCCS budget breakdown 2007-08 to 2009-10			
	Outturn 2007-08 £'000	Forecast 2008-09 £'000	Forecast 2009-10 £'000
<i>Running costs:</i>			
<i>(no of staff - FTE)</i>	10	13	14
Staff costs	438	570	600
Rent, rates & other accommodation costs	69	50	95
Other running costs	102	245	270
Legal advice	45	25	15
Publicity and printing	51	50	15
<i>Total running costs</i>	705		995
<i>Capital:</i>			
Office fit-out and furnishing	291	30	0
Equipment and software	42	10	5
<i>Total capital costs</i>	333	50	5
TOTAL	1,037	990	1,000

The estimated annual rent on our permanent accommodation is £45,000. Rates, service charges etc will take this to about £95,000. As the rent-free period for the accommodation extends through to December 2008, 2009-10 will see an increase in projected expenditure of £45,000 under this heading.

6. PCCS BUSINESS PLAN 2008-09

Objective 1: To scrutinise independently the manner in which police organisations deal with complaints from the public they serve

Key deliverable	Target date	Lead person
<p>To further develop the PCCS's processes for reviewing complaints about the police to ensure that they are robust, customer-friendly and stand as an exemplar in terms of service standards</p> <ul style="list-style-type: none"> • Develop key performance indicators and monitor progress against those indicators • Develop stakeholder engagement mechanisms, including a conference 	<p>June 2008/ongoing</p>	<p>CCO</p>
<p>Seek the views of enquirers as to how we can further improve our service</p> <ul style="list-style-type: none"> • Develop draft satisfaction survey, with input from the Advisory panel • Pilot survey with a sample of enquirers • Roll out survey to all enquirers 	<p>August 2008 December 2008 January 2008</p>	<p>Director/CCO COs BPM</p>
<p>Develop memoranda of understanding with police organisations on the handling of complaints referred to the PCCS</p> <ul style="list-style-type: none"> • Develop protocols with other policing agencies operating in Scotland • Further develop protocols with police organisations in the light of experience gained from early complaints 	<p>June 2008</p>	<p>PLO</p>

Objective 2: To ensure that police organisations in Scotland have in place appropriate procedures for handling complaints and that these procedures are followed effectively

Key deliverable	Target date	Lead person
Review police organisations' existing complaint handling procedures: <ul style="list-style-type: none"> • review all complaint handling procedures and prepare an interim report • review accessibility of police complaint handling processes 	June 2008 June 2008	Director COs/Director
Consider whether complaints about police organisations have been handled within these procedures by: <ul style="list-style-type: none"> • reviewing case papers against procedures 	Ongoing	CCO/Case officers

Objective 3: To drive up standards and consistency in the way police complaints are handled across the Scottish Police Service

Key deliverable	Target date	Lead person
Identify areas of best practice within police bodies' existing complaint handling practices and encourage a levelling-up to existing best practice: <ul style="list-style-type: none"> • build on initial assessment of existing complaint handling procedures, and police forces' self-assessments, to develop template highlighting best practice 	January 2009	

Objective 4: To prepare reports for Scottish Ministers about how complaints are being dealt with, both general reports commenting on police organisations as a whole, and specific reports dealing with particular issues which may arise

Key deliverable	Target date	Lead person
Provide Ministers with an annual report on the PCCS's own performance and how police organisations are handling complaints: <ul style="list-style-type: none"> • Annual report to Ministers • consider whether further reports called for in light of individual complaints received 	October 2008 Ongoing	Director – outline BPM – content Commissioner
Publish summary statistics showing the number and nature of complaints received by police organisations: work with police forces and HMIC to ensure consistency in reporting	ongoing	PLO

Objective 5: To run an efficient and effective organisation in accordance with best practice for Scottish public bodies

Key deliverable	Target date	Lead person
<ul style="list-style-type: none"> • institute a rolling review of all administrative arrangements and contracts to ensure that we continue to obtain best value for the public purse • introduce our new complaint handling database, Centurion • complete recruitment of permanent staff – director, business performance manager, office support manager • further develop the role of the Advisory Panel 	<p>September 2008</p> <p>November 2008</p>	<p>BPM</p> <p>BPM</p> <p>Commissioner/Director/BPM</p> <p>Director</p>

7. PCCS RISK REGISTER 2008-09

Risk	Likelihood/ impact	Response	Action required	Responsibility	Review frequency
Objective 1: To scrutinise independently the manner in which police organisations deal with complaints from the public they serve.					
Failure to engage successfully with external stakeholders	low/medium	treat	Identify key stakeholders, institute initial meetings and follow up as required	Commissioner/ Director	6 monthly
Legal challenge of one of the Commissioner's decisions	Medium/high	treat	Test validity of precedent-setting cases	Commissioner/ CCO	
Objective 2: To ensure that police organisations in Scotland have in place appropriate procedures for handling complaints and that these procedures are followed effectively.					
Objective 3: To drive up standards and consistency in the way police complaints are handled across the Scottish Police Service.					
Breakdown of relationship with individual police force, police authority or policing agency	high/medium	treat	Maintain open working relationships with police bodies, ensuring consistency of approach	Commissioner/ Director/PLO	3 monthly
Objective 4: To prepare reports for Scottish Ministers about how complaints are being dealt with, both general reports commenting on police organisations as a whole, and specific reports dealing with particular issues which may arise.					
Relative roles of PCCS and sponsorship division insufficiently defined	low/medium	treat	- agree MS/FM with sponsor division - maintain regular contact	Director/BPM	6 monthly
Change in Ministerial policy	low/high	tolerate	Keep under review	Commissioner/ Director	3 monthly

Risk	Likelihood/ impact	Response	Action required	Responsibility	Review frequency
Objective 5: To run an efficient and effective organisation in accordance with best practice for Scottish public bodies					
Losing key personnel	medium/high	treat	Maintain positive and open working environment to ensure that the PCCS is seen as an attractive employer; set up training and development opportunities	Commissioner/ Director/CCO	Monthly
Insufficiently robust financial monitoring systems lead to challenge	low/high	treat	Regular monitoring of financial systems	BPM	Monthly
Delay in introducing new database for monitoring complaint handling	Medium/high	treat	Regular liaison with supplier and SG to ensure smooth introduction	BPM	Weekly until implemented
Increase in volume of Fol requests and complaints about PCCS	Medium/high	treat	Monitor volume; identify any root causes and amend processes accordingly	BPM/Director	Quarterly