



**Northern Constabulary -
Follow up audit conducted
March - April 2011**

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PCCS
Police Complaints Commissioner
for Scotland

Executive summary

This audit was carried out to follow up on the previous audit of Northern Constabulary's complaint analysis and recording which was published in October 2009 and to ensure that the recommendations have been implemented and are being complied with.

Following analysis of the updated response from Northern Constabulary and associated paperwork, fieldwork was carried out in April 2011. The fieldwork concentrated on the management process within the Professional Standards and Conduct Unit at Inverness and at the Wick Divisional Command office in the North Division which had piloted the new local complaint handling process.

Documentation was requested in support of the response that had been provided and this was analysed. Additionally, a dip sample of approximately 10% (27) of complaints closed for the year 2010 were examined as were 100% of the items in the miscellaneous correspondence file from the Wick Divisional Command office.

Overall the Constabulary has discharged its obligation under five of the seven original recommendations.

With regard to Recommendations 2 (which related to a focussed audit of local correspondence received) and Recommendation 4 (concerning a programme of on-going regular audits of local correspondence received) It was identified that Recommendation 2 had only partially been implemented while Recommendation 4 was not yet implemented.

It was apparent, nevertheless, that changes had been made (not least the implementation of the other recommendations) which had reduced the risk to the system as a whole. Additionally there was a clear intent from Northern Constabulary to learn from complaints to effect change in order to improve. The evidence supplied to the PCCS throughout the follow-up process supported this.

Overall the complaints system of Northern Constabulary has been assessed as providing **substantial assurance** that the system is essentially sound but with weaknesses that put some system objectives at risk.

However, to ensure that the recommendations are realised, the Commissioner requests that for the first year following implementation all local correspondence audit paperwork be copied to him regularly for monitoring purposes.

The Commissioner wishes to thank the Executive, the officers and staff of Northern Constabulary for their co-operation and assistance during the course of this follow up audit.

Limitations of audit process

The matters raised in this report are only those which came to our attention during the course of our audit. An audit is based on random samples and not every aspect of the organisation's complaints system has necessarily been covered. Therefore, weaknesses may exist which have not been identified in this current assessment.

Assurance levels

In conducting this audit the PCCS has applied the following levels of assurance:

Assurance level	Definition
FULL	Sound system of control designed to achieve the system objectives.
SUBSTANTIAL	Essentially a sound system but with weaknesses that put some system objectives at risk.
LIMITED	Weaknesses in the system of controls put system objectives at risk.
NIL	Control is weak leaving the system open to significant error or abuse.

Recommendation levels

The following recommendation levels have been applied based on the potential risk to the organisation:

Recommendation levels	Definition
Priority 1	Issue subjecting the Constabulary to material risk and which requires to be brought to the attention of the Constabulary executive.
Priority 2	Issue subjecting the Constabulary to significant risk and which should be addressed by the senior management team.
Priority 3	Matters which if addressed will enhance efficiency and effectiveness.

Statement of assurance

In general, controls over the complaints management process were found to be operating effectively. The main weaknesses identified in the original audit related to the need to implement a formal audit process in order to ensure that all complaints about the police received at local command areas are properly identified. It would also help ensure that the standard of work completed at local command levels and the central command level are subject to a continuous improvement programme of audit and oversight.

Five out of seven of the recommendations made have now been applied and this has enhanced control over the complaints management process. However, this will be further improved by the full implementation of the final two recommendations.

Therefore an overall assurance level that considers the weaknesses which are highlighted and detailed later in this report has been assigned. The assurance level for the complaints management system in Northern Constabulary is as follows:

Substantial Assurance*

Outcome

The following table summarises the recommendations that remain outstanding:

Priority 1	Priority 2	Priority 3
0		2

One recommendation has been partially implemented. This recommendation advised that Northern Constabulary should carry out a focussed examination of routine correspondence previously received at local command level. For the reasons outlined in this report, this has been reclassified from a priority 2 recommendation to a priority 3 recommendation.

One recommendation has not been implemented. However, for the reasons outlined in this report, the recommendation has been reclassified from a priority 2 recommendation to a priority 3 recommendation. This recommendation was that Northern Constabulary should set in place a programme of on-going regular audits of correspondence received at local command level.

These outcomes, along with the additional five recommendations that were originally made and which have now been discharged, are explained fully in the main body of the report.

* *Essentially a sound system but with weaknesses that put some system objectives at risk.*

Background

In April 2009, concerns emerged from the Commissioner's reviews of complaints about Northern Constabulary that the force might not be recording and enquiring into all of the complaints brought to it by members of the public.

As a result, an audit was carried out by the PCCS which was published in October 2009. 42% (151) of complaint cases recorded between April 2007 and March 2009 were examined. The audit looked at whether the complaints had been recorded and enquired into accurately. In 19% of the cases examined shortcomings were identified. In cases where additional allegations should have been identified and recorded, it was considered to be due to a lack of applied oversight, not a systemic failure to record.

It was found that a significant number of complaints were recorded and dealt with at local command level. The audit identified weaknesses in the local complaint process, which were resulting in some complaints not being properly recognised. Consequently, the Professional Standards and Conduct Unit (PSCU) were not aware of these matters and were therefore unable to monitor and ensure standards.

The PSCU had begun to carry out quality checks on complaint cases managed at local level and this had been found to drive up standards. However, it was identified that additional oversight by the senior management team would enhance the process.

Additionally, the audit found that where a quality of service complaint (ie a complaint about the service provided by the force) was identified along with a complaint about the conduct of an officer, the complaint was generally recorded, enquired into and closed appropriately. However, when the correspondence related solely to quality of service, the position was less clear. There appeared to be a lack of clarity as to what constituted a quality of service complaint about the police.

The audit recognised that Northern Constabulary was "quietly making progress to improve standards and learning from complaints". However, the Commissioner believed that there was merit in the force sharing such learning on a wider basis. While the forces in Scotland share learning through the ACPOS Professional Standards Business Area and the Practitioner's Forum, the audit identified that such information should also be shared with the Commissioner.

Further to the completion of the original audit, the force provided PCCS with a proposed action plan. The force aimed to implement all of the recommendations by December 2009.

In January 2011, the Commissioner received an updated action plan from Northern Constabulary along with associated documentation to evidence the action taken. The PCCS carried out analysis of the response and documentation and this was followed by a fieldwork visit being carried out on 13, 14 and 15 April 2011.

Terms of reference

The aim of this piece of work is to follow up on the previous audit of Northern Constabulary Complaint Analysis and Recording, and ensure that all of the recommendations have been implemented and are being complied with. The follow up audit has not focussed on areas outwith the recommendations made in the original audit.

The fieldwork concentrated on the complaint management process within the PSCU at Inverness and at the Wick office in the North Division which had piloted the new local complaint handling process from September 2010 to March 2011. This follow up work involved assessing the paperwork relating to the recommendations made, reviewing 10% (27) of complaint files closed from January 2010 to April 2011, and examining 18 pieces of correspondence in a miscellaneous file held in the Wick office.

The objectives of this follow up audit were:

- to review the force action plan and ensure that PCCS recommendations have been implemented
- to analyse the additional documentation supplied and establish any gaps that might exist
- to re-visit the force and gather sufficient paperwork and evidence to support the implementation of the recommendations
- to compile a report and provide feedback and actions to the force where necessary.

Recommendation summary

Priority	Recommendation	Due date
2	1	1 December 2009
recommendation	That Northern Constabulary set in place a programme of regular audits of closed complaint cases to be carried out by a member of the senior management team of the Constabulary to ensure standards are maintained and improved, satisfying the Commissioner that it is done by the due date.	
rationale	While there were regular review meetings dealing with the on-going work of the PSCU there was no programme of regular audits of closed complaint cases by any senior manager out-with the unit itself. The recommendation was made to improve the oversight of the process and the standards applied.	
Original action	The Constabulary agreed to provide a SMART action plan to address the recommendation. A Chief Superintendent was appointed to exercise executive oversight of PSCU matters and a command protocol would be put in place to clarify roles. A representative audit framework was being researched and was to be put in place by October 2009.	
Updated action	The Chief Superintendent has taken on the responsibility and a full sample of the latest audit of random closed cases was supplied to PCCS. The executive audit is now a regular feature.	
Outcome	The documentation supplied of the sample audit was in order. The fieldwork visit has confirmed that the executive audit is now an on-going process and is carried out quarterly. The results of the audit show marked improvement in the following of processes and learning is clearly identified. This recommendation is now discharged.	

Priority	Recommendation	Due date
2	2	1 December 2009
Recommendation	That Northern Constabulary carry out an initial focussed examination of routine correspondence previously received at local command level to ensure that corporate standards and the provisions of the Act are being complied with, satisfying the Commissioner that it has been done by the due date.	

rationale	The PSCU conduct manual set out that annual audits of each service unit would be carried out to ensure compliance with corporate standards. This had not been done for some time. The recommendation was made to help the Constabulary ensure that complaints about the police received at local level were properly recorded and enquired into.
Original action	The Constabulary agreed to provide a SMART action plan to address the recommendation. Head of PSCU would draw up a rolling programme of cross force area command general correspondence. 10% of area command general correspondence would be audited. A programme would be set in place and commenced by 1 October 2009.
Updated action	This was initially concentrated in the North Division as this was the pilot for local complaint handling. Examples of the audits were supplied. A Chief Inspector was assigned to the PSCU and would take on responsibility of such audits being undertaken at division and HQ.
Outcome	This recommendation was partially implemented. Initially three areas of North Division were to be audited. One area was visited but not audited. No follow up visit has yet been carried out. A request was made by the head of PSCU to have two areas within Central and East Division audited before the end of February 2010. This was not completed. Assurances have now been given that the remaining areas will be audited by August 2011. The Commissioner has reclassified this recommendation to priority 3 and requests that on completion, the audit paperwork be copied to him for monitoring purposes.

Priority	Recommendation	Due date
2	3	1 December 2009
recommendation	That Northern Constabulary ensures that there is a robust understanding at local command level of what is a complaint about the police especially relating to quality of service provided by the Constabulary and issue clear guidance on the recording of all such complaints about the police to the Constabulary satisfying the Commissioner that it has done so by the due date.	
Rationale	This recommendation was made to ensure that there was an understanding at local command levels of what is a complaint about the police especially relating to quality of service.	
Original action	The Constabulary agreed to provide a SMART action plan to address the recommendation. Training in dealing with complaints about the police would be given to various levels at various courses. It was noted that no specific local training existed for Inspectors and Chief Inspectors and there was scope to develop force courses covering the aspects of inspectors duties. Additionally all complaints were to be routed through PSCU. The PSCU complaint manual would be reviewed.	
Updated action	The PSCU delivered inputs at all levels of in force training from probationers to first line managers. Also there was a new initiative where enquiry officers give informal presentations and question & answer sessions at various stations.	
Outcome	The initial paperwork supported some of the action taken. However, on carrying out the fieldwork a full review of force training relating to complaints was carried out and the paperwork available in force supported the action taken and evidenced that the training carried out is being evaluated to ensure its effectiveness. This recommendation is now discharged.	

Priority	Recommendation	Due date
2	4	1 December 2009
recommendation	That Northern Constabulary set in place a programme of on-going regular audits of correspondence received at local command levels to ensure that local commanders comply with corporate standards and the provisions of the Act satisfying the Commissioner that it has done so by the due date.	
Rationale	The PSCU conduct manual set out that annual audits of each service unit would be carried out to ensure compliance with corporate standards. This had not been done for some time. The manual identified a potential weakness in the process and put in place a control measure to test and ensure compliance. The recommendation was made to ensure that standards are maintained and improved.	
Original action	The Constabulary agreed to provide a SMART action plan to address the recommendation. The head of the PSCU would draw up a rolling programme of cross force audits of area general command correspondence and provide a report on outcomes to relevant divisional officers. This would be achieved in tandem with enquiries in area commands or by asking for dip sample copies of area command correspondence. 10% of area command correspondence would be audited. This would begin by October 2009.	
Updated action	The rollout of the local resolution process gives individual responsibility to Divisional Commanders and Service Unit Managers. This should also ensure that every complaint case dealt with at local level will be audited by the PSCU.	
Outcome	This recommendation has not yet been implemented although some measures have been taken to ensure a tightening up of processes with the introduction of local complaint handling. Assurances have now been given that this recommendation will be implemented by September 2011. The Commissioner has reclassified this recommendation to priority 3, and requests that for the first year following implementation, all local correspondence audit paperwork be copied to him regularly for monitoring purposes.	

Priority	Recommendation	Due date
2	5	1 December 2009
recommendation	That Northern Constabulary share the learning from complaints about the police with the Commissioner. This should be shared on a regular basis and the Commissioner would be keen to receive the Constabularies proposals in that regard by the due date.	
Rationale	A system of additional scrutiny was introduced on how complaint cases are finally concluded. This ensures that each complaint prior to closure is assessed to confirm that all complaint allegations have been recorded, investigated and responded to and importantly that any organisational or individual learning points are captured and considered. The recommendation supports the learning agenda.	
Original action	The Constabulary agreed to provide a SMART action plan to address the recommendation. Northern Constabulary would consider the ACPOS Professional Standards Business Area view on this at a meeting in June 2009. Practitioners had concerns over what was required. PCCS clarified that a synopsis of recommendations arising from complaints should be considered. Processes would be in place by October 2009.	

Updated action	This will be audited by the head of PSCU. Bulletins from the PCCS are immediately shared with the force. Any specific outcomes from the ACPOS Professional Standards Business Area are highlighted throughout the force, although individual learning was not deemed to be relevant for wider dissemination.
Outcome	There is evidence that Northern Constabulary is embracing a culture of learning from complaints. It has been evidenced that learning from complaints is now widely circulated and implemented force wide. Additionally the Commissioner is advised that a database is currently under construction that will encapsulate all learning from complaints and that this will be shared with the Commissioner on a regular basis. This recommendation has been discharged.

Priority	Recommendation	Due date
3	6	1 December 2009
recommendation	To ensure consistency in the recording of complaints about the police across Scotland, Northern Constabulary should comply with the statistical guidance as issued by HMICS and PCCS.	
Rationale	It is important that all forces in Scotland record complaints about the police to the same standard. The Commissioner has adopted the definitions provided by HMICS and ACPOS and has encouraged forces to ensure consistency in recording practices. The recommendation was made to ensure that the Constabulary records complaints about the police to this agreed standard.	
Original action	Review the detail required in statistical returns and ensure compliance with the standard. Complete by September 2009.	
Updated action	2009/10 saw a rise of 55% in the number of recorded complaints in Northern Constabulary.	
outcome	A 55% rise was indeed evident from the annual statistical return for complaints in 2009/10. No reason was identified for this other than a more rigorous approach to the recording of complaints. Coupled with the evidence provided by Northern Constabulary in relation to the other recommendations – particularly in relation to training, and an increased awareness through learning from complaints, the Commissioner is satisfied that this recommendation has now been discharged.	

Priority	Recommendation	Due date
3	7	1 December 2009
recommendation	A recurring theme during the audit was the failure by the enquiry officer to seize, view or retain CCTV images. The Commissioner would wish to see clear improvement in performance in this area and would be keen to receive the Constabulary's proposals in that regard by the due date.	
Rationale	In addition to the lost opportunity to review the CCTV evidence, the failure to seize and retain the evidence leaves the Constabulary open to allegations of collusion and corruption. The recommendation was made to support improvement in this area.	

Original action	The Constabulary agreed to provide a SMART action plan to address the recommendation. The force will ensure that CCTV is seized at the initial recording of a complaint as a priority. Processes are in place for this. The wider force issue on the technical issues and training will be looked at in all area commands to ensure the system is fit for purpose by September 2009.
Updated action	There has been a marked improvement and to ensure that this continues, the head of PSCU and Head of Operations have worked together to establish that systems are in place at all relevant stations to ensure that CCTV in place is recording and working to a proper standard.
outcome	Procedures are now in place to check regularly that CCTV systems are operational. The process for seizing, reviewing and retaining CCTV footage has been included in the new local complaint handling procedure. Additionally, while dip sampling complaints during the fieldwork visit, evidence of good practice in this area was identified. This recommendation has now been discharged.

Follow up audit outcomes

Recommendation 1

That Northern Constabulary set in place a programme of regular audits of closed complaint cases to be carried out by a member of the senior management team of the Constabulary to ensure standards are maintained and improved, satisfying the Commissioner that it is done by the due date.

In the updated response from Northern Constabulary received in January 2011, the Commissioner was advised that a Chief Superintendent had now taken responsibility for the implementation of this recommendation. A full sample of the latest audit carried out by the Chief Superintendent (audit 2) was enclosed with the response. The response stated that the third audit was scheduled to take place in January 2011.

Following analysis, the Commissioner's office requested additional information which would allow the recommendation to be discharged. This included:

- A copy of the audit plan
- The paperwork from audit 1
- The paperwork from audit 3 (scheduled for January 2011)
- Evidence that any actions from audit were completed within timescales as requested by the Chief Superintendent, and
- Evidence of learning being followed up

During the fieldwork visit to the force, the above documentation was provided and was subject to analysis along with the previously supplied information and the outcome of a discussion with the Chief Superintendent.

The information provided demonstrates that the executive audits are now being carried out regularly every three months. It is clear that this recommendation has been fully implemented. Learning is being identified from each audit, and processes put in place to rectify any weaknesses. During discussion, the Chief Superintendent explained his methodology and the rigour with which any actions outlined are tracked. The master list for each audit confirms this to be the case. Additionally there is evidence of a marked improvement in the findings between executive audits 1, 2 and 3 with previous issues having been addressed.

Recommendation 2

That Northern Constabulary carry out an initial focussed examination of routine correspondence previously received at local command level to ensure that corporate standards and the provisions of the Act are being complied with, satisfying the Commissioner that it has been done by the due date.

Recommendation 4

That Northern Constabulary set in place a programme of on-going regular audits of correspondence received at local command levels to ensure that local commanders comply with corporate standards and the provision of the Act satisfying the Commissioner that it has done so by the due date.

The information provided by Northern Constabulary in relation to Recommendation 2 included a brief report from audits of local correspondence received in Shetland, and Wick. However, on attending to carry out an audit in Orkney, the responsible officer found that no-one was available that day to assist. This audit has not yet been followed up. The head of the PSCU also requested audits to be carried out in Dingwall and in Inverness by the end of February 2010. To date these have not been completed.

During the fieldwork visit, Senior Officers provided an explanation for the lapse in taking the necessary action in respect of these recommendations. The Commissioner recognises the difficulties for the force regarding the geographical locations of the police offices that require to be visited. It is also noted that in order to ensure the most effective use of resources, audits of local correspondence were scheduled to coincide with other police business in the area. Senior Officers explained that a judgement call had to be made regarding competing priorities. The focussed audit of local correspondence was therefore identified as being less important at that time than other actions required of Northern Constabulary. Part justification for this reasoning is that the new local complaint handling process means that all complaints must be quality checked by the PSCU on closure. This reduces the risk to the force's complaint management system.

With reference to Recommendation 4, the focussed audit was not completed and no programme is yet in place for the on-going regular audits of correspondence received at local command levels.

During the fieldwork visit to Northern Constabulary, the PCCS carried out a full review of all items held in the correspondence file at the North Divisional Command office in Wick.

Twenty four items were checked in total. Recording issues were found in 2 letters (8.5%) which were identified as quality of service complaints about the police. Both items had been dealt with appropriately. However, they had not been recorded in the complaint system as complaints about the police. Northern Constabulary has been advised that for completeness, these items should now be recorded as they would fall within the current year for reporting in the annual statistical return. The Commissioner is content that evidence of this has been received.

It is disappointing that these recommendations have not been discharged by Northern Constabulary, given the length of time since the due date for implementation of December 2009. However, since Recommendation 2 was partially completed, and there have been changes in process since the original audit which reduce the risk to the system, Recommendations 2 and 4 are now reclassified to **priority three recommendations** – i.e. If these issues are addressed, it will enhance the efficiency and effectiveness of the complaint handling system.

The Commissioner has been given assurances by the force that an audit plan in respect of recommendation 4 will be provided by 6 May 2011, for implementation in September 2011. The focussed audit will be completed by August 2011.

Action - The Commissioner requests that for the first year following implementation, all local correspondence audit paperwork be copied to him regularly for monitoring purposes.

Recommendation 3

That Northern Constabulary ensures that there is a robust understanding at local command level of what is a complaint about the police especially relating to quality of service provided by the Constabulary and issue clear guidance on the recording of all such complaints about the police to the Constabulary satisfying the Commissioner that it has done so by the due date.

The initial action plan from the force in relation to this recommendation was to agree a training schedule and include complaints about the police in training to all levels of officers and staff. In support of this, Northern Constabulary included in its response of 12 January 2011 a list of all presentations carried out by the PSCU from 2004 to present. However, on analysis, it was decided that additional information would be required in order to discharge this recommendation.

On visiting Northern Constabulary additional information was requested. This included:

- A copy of the training schedule
- Paperwork showing who attended the courses
- Evidence of the relevance and content of the course
- Information demonstrating how staff and officers are assessed to ensure they are competent and understand the relevance and importance of their own role
- Feedback of training from attendees
- Evaluation of training to ensure its significance

Following review of the information and taking into account discussion with Senior Officers within Northern Constabulary, PCCS has a clear picture of the training provided to officers and staff relating to complaints about the police.

With the advent of new local complaint handling procedures rolled out across the force in April 2011, specific training is being provided to all local supervisors and managers in this regard. A list of attendees had been made available to the PCCS. Additionally, the information provided demonstrates that training in ethics and conduct, training for police supervisory staff (including those who are newly promoted), training for special constables, and the force induction programme include inputs on complaints about the police. Copies of the presentations given during training demonstrate the relevance of the course content.

An important aspect of the training process is obtaining feedback and evaluation to ensure that training is up to date, relevant, and effective. A sample of evaluation and learning was provided in the documentation to the Commissioner. Additionally, the design specification for each training course includes guidance on the evaluation process. The Commissioner is therefore content that feedback and evaluation are evidenced in the documentation provided, which should ensure that training is monitored and updated when necessary.

The success of this training will be measured by the force's internal audit processes which will perpetuate the cycle of continual improvement and learning.

From this the Commissioner is satisfied that recommendation 3 is now discharged.

Recommendation 5

That Northern Constabulary share the learning from complaints about the police with the Commissioner. This should be shared on a regular basis and the Commissioner would be keen to receive the Constabularies proposals in that regard by the due date.

The Constabulary, in its original response indicated that it would seek the view of the ACPOS Professional Standards Business Area. However, evidence of learning from complaints was apparent from the information supplied by the force in January 2011, particularly in relation to Recommendation 1 and the executive audits. On analysis of this information, the PCCS requested some additional information in relation to this recommendation:

- A copy of the plan or process for disseminating learning
- The process for implementing recommendations
- Evidence being shared across the force / with other forces and with the PCCS

The force subsequently provided substantial information relating to the dissemination and implementation of recommendations such as:

- A force reference document providing guidance on team briefings
- A copy of the force learning log including checks that recommendations and learning points are actioned.
- Force outlook documents, PSCU and information bulletins, and
- Copies of training presentations

There is evidence that Northern Constabulary is embracing a culture of learning from complaints. Additionally the Commissioner is advised that a database is currently under construction that will encapsulate all learning from complaints and that this will be shared with the Commissioner on a regular basis. Therefore, this recommendation has been discharged.

Recommendation 6

To ensure consistency in the recording of complaints about the police across Scotland, Northern Constabulary should comply with the statistical guidance as issued by HMICS and PCCS.

In the updated response, Northern Constabulary referred to a 55% rise in complaints as published in the annual statistical return demonstrating that the force had worked to the guidance provided.

A 55% rise was indeed evident from the annual statistical return for complaints in 2009/10. No reason was identified for this other than a more rigorous approach to the recording of complaints.

Both the dip sample of closed complaints and the review of local correspondence carried out during the fieldwork visit help demonstrate an increased awareness of the correct processes for the recording of complaints.

With regard to the dip sample, 27 closed complaints were examined (approximately 10%). Overall the cases were compliant. Recording practices demonstrated that the complaints made by the complainer were accurately assessed and recorded in accordance with the agreed ACPOS guidelines, the force database was completed showing the outcome accurately and a final response was sent to the complainer.

Of the 27 cases reviewed only three (11%) identified some inaccuracy in recording and assessment. In two further cases, a file closure form was missing from the file and while the cases were otherwise

compliant the potential does exist for mistakes to occur if the force allows cases to be closed without this final step in their management process being followed.

In the review of local correspondence only 2 (8.5%) of the items examined were found not to be recorded, although they had been properly dealt with as quality of service complaints about the police.

Additionally, the above information must also be coupled with the evidence provided by Northern Constabulary in relation to the other recommendations – particularly in relation to training, and an increased awareness through learning from complaints. The Commissioner is therefore satisfied that this recommendation has now been discharged.

Recommendation 7

A recurring theme during the audit was the failure by the enquiry officer to seize view or retain CCTV images. The Commissioner would wish to see clear improvement in performance in this area and would be keen to receive the Constabulary's proposals in that regard by the due date.

In its response of January 2011, Northern Constabulary stated that it had put processes in place to ensure the maintenance of CCTV systems across the force. In North Division, CCTV is now checked weekly to ensure that it is operational. In Central Division, the checks are now the responsibility for the custody suite sergeant. These checks are now all logged. East Division also carry out regular checks that the systems are operational. A number of sergeants in East Division were identified for training in the downloading of CCTV footage "to allow timely access if required for Complaints about the Police".

Additionally the new force guidance document on the local complaint handling process includes a section on CCTV as evidence in complaints about the police. This refers to seizure at the earliest opportunity; ensuring in ALL cases where a recording exists, regardless of perceived evidential relevance, that the correct timeframes be copied; that the discs are lodged as normal productions and that they are retained for seven years.

The Commissioner is satisfied that Northern Constabulary has discharged this recommendation.

Conclusion

The recommendations set out in the original audit were intended to assist the force in improving its performance in managing and learning from complaints about the police. Having returned to the force some 17 months after the original audit was carried out, the Commissioner is encouraged by the findings of this follow up audit.

While the force has been unable to discharge all seven recommendations made, there is a clear intent to learn from complaints, to learn from the recommendations made by the PCCS and to effect change in order to improve. The evidence supplied to the PCCS throughout this follow-up process has identified where the recommendations have been implemented and how this has effected changes and improvements in practice. As a result the risk to the complaints management system has been significantly reduced.

Overall the complaint system of Northern Constabulary has been assessed as providing **Substantial Assurance** that the complaint system is essentially sound, but with weaknesses that put some system objectives at risk.

Five of the original recommendations (1,3,5,6 and 7) have been discharged to the Commissioner's satisfaction. However, recommendations 2 and 4 - while now posing less risk to the complaint system as a whole due to the improvements already implemented- will nonetheless enhance the efficiency and effectiveness of a sound complaints system when they are employed.

Action to be taken

In order to ensure that the outstanding recommendations have been fully discharged, the Commissioner requests that for the first year following implementation, all local correspondence audit paperwork be copied to him regularly for monitoring purposes.