

Policing Accountability Board outcome report



Date of meeting:	13th February 2018	
Author:	Det Supt. David Guiney	
Outcome (please tick the outcome you are reporting on)		
Public confidence		
Victim satisfaction		
Organisational health and well-being		
HMIC		
Office of Police Conduct	✓	



Rating



Inadequate ●○○○ Requires improvement ●●○○ Good ●●●○ Outstanding ●●●●

What is working well? How will we build on this?

Q2 data from the IOPC was released in mid-November. Q3 data was submitted to the IPCC (now IOPC) at the beginning of January and at the time of writing this report we are awaiting the publication of the results.

The Q2 statistics continued to show improvements in the timeliness for finalising allegations by means of Local Resolution - 74 days compared to 103 days for the last financial year. This saw us increase our position in the national rankings to 29th out of 44 forces. As a comparator - at the end of last year Dyfed Powys was sitting in 43rd position.

Our provisional YTD figures indicate that we are finalising LR allegations within 67 days. This is better than the current national average - which stands at 70 days - and will hopefully see us increase our position in the national rankings when the Q3 IOPC statistics are published.

This improvement is also significant considering there has been a notable increase in the number of complaints that are now being finalised through Local Resolution. For the YTD, 60% of complaint cases have been finalised through Local Resolution compared to 25% at the end of the last calendar year.

In terms of allegations dealt with by Local Investigation, the Q2 statistics showed these were being finalised in an average of 236 working days - higher than the national average of 166 days. However this is not reflective of the true performance as the average figure has been skewed by the completion of legacy cases. Over 75% of cases finalised by Local Investigation YTD were completed in less than 166 days.

The completion of the outstanding legacy cases has been – and remains - a priority for PSD and they are subject of regular updates to the Deputy Chief Constable. It is anticipated that these will all be concluded by the end of the financial year.

PSD performance data has now been incorporated into Qlikview. This data is available to BCU managers and to officers of Inspector rank and above. The data available includes: -

- Number of complaints per BCU
- Number of allegations per BCU
- Finalisations and timeliness for local investigations
- Finalisation and timeliness for local resolutions
- Details of all outstanding cases to include BCU, complainant's details, number of allegations and days active
- Top 10 complainants
- Top 10 officers / staff subject of complaints

In the interests of transparency, PSD is currently reviewing what additional performance data it can publish on the Dyfed-Powys Police public site.

What is not working well? How will we manage this?

There remains a backlog of checks to address the percentage of the workforce that do not hold an up to date vetting status which is in non-compliance with national standards. In order to address this backlog and to maintain business as usual, one member of the Vetting Team has been assigned to work through the backlog whilst the remainder of the Vetting Team deal with the incoming requests.

A recent All Users' e-mail from DCC Davies urged officers and staff to complete and return any vetting forms as a matter of urgency; and emphasised that continued failures to complete and return them would be viewed as a potential breach of the Vetting Code of Practice which could lead to disciplinary action.

The significant numbers of transferees and new recruits joining the organisation has had a considerable impact in terms of vetting application workloads for the Department. In January, the Estates Team notified Vetting that there are potentially 176 contractors who will need prioritised vetting checks. Furthermore, following an agreement between the NPCC and Her Majesty's Prison and Probation Service there will be a requirement to process 35 Level 2 vetting applications for Probation staff - all of which will place significant additional demand on the Vetting Team.

Following a procurement process, the Force has acquired a bespoke vetting system – 'Core Vet'. An initial meeting has been arranged for 13th February 2018 to facilitate the service providers (WPC) and Dyfed-Powys IS&T in planning the installation and roll out of the new system. The target date for completion of this work is early July 2018. Once this has been introduced and embedded into the Department, the system will greatly assist in the effective management of the vetting process.

The recent increase in the frequency and gravity of conduct matters being dealt with by the Anti-Corruption Unit has placed a significant increased demand on this small team and has highlighted the need to consider increasing capacity in this area.

The current capacity limits the proactive capability of the unit. The HMIC feedback received in October 2017 highlighted the need for the unit to be more proactive.

Preparation of the PSD return for the Force Management Statement is helping to identify areas of weakness in terms of capacity and from February onwards, PSD will embark on a Departmental Review and will work closely with the Business Improvement Department to address any areas for improvement identified.

What are our opportunities? How will we exploit them?

The Public Service Bureau will come under the management of PSD from 1st April 2018 onwards - providing the opportunity for PSD to oversee the entire front end of the complaints process. This will benefit the Force and members of the public - particularly in terms of clarity in remit and role between PSD and the relevant appeal bodies. The current work practices of the Public Service Bureau will form part of the Departmental Review which will seek to ensure greater cohesion and streamlining of our processes to maximise efficiency and effectiveness

This transition also pre-empts the changes expected in Phase 3 of the reforms to the Police Complaints and Discipline systems - which for the first time will recognise a process for resolving complaints outside of the formal complaints process.

PSD will increase its emphasis on reducing the frequency of misconduct and complaint issues by raising officer and staff awareness of their professional responsibilities. The key areas where PSD will strive to

raise officer and staff awareness will be determined by the most recent complaint and misconduct data with an emphasis on learning the lessons and avoiding a repeat of previous mistakes. A recent example is the "Think Before You Type" bulletin posted by DC Meinir Thomas in January. Another initiative will be to monitor "Clued Up" for potential undisclosed Business Interests and to advise individuals accordingly.

What are our threats? How will we manage them?

From 15th December 2017, the 'Former Officer and Barred and Advisory List Regulations 2017' came into effect. This included the removal of Regulation 10A of Police (Conduct) (Amendment) Regulations 2014 allowing officers to now retire or resign whilst under investigation for misconduct and the creation of an Advisory List and a Barred List. The Barred List will prohibit officers / staff who have been dismissed - or who would have been dismissed if they had not retired or resigned - from working within policing and certain law enforcement bodies in future.

As a result of these changes, misconduct proceedings will now have to be taken to their conclusion in respect of officers who leave or have already left the Force. It is expected that this will lead to an increase in the number of Misconduct Hearings held by Dyfed Powys Police. These hearings are very resource intensive and we will continue to ensure that they are run as effectively and efficiently as possible in order to minimise the impact on our finite resources.

The introduction of the Legally Qualified Chairs (LQCs) has presented new challenges and it has become evident that hearings are taking longer to complete than previously. This can place an unnecessary demand on our resources and increase costs. This may be due in part to the fact that the current payment structure only affords LQCs payment for the actual hearing and does not cover preparation time. PSD is happy to work with the OPCC to consider improvements to the current pay structure and to consider whether changes such as a one off fee (taking into account preparation time) - as opposed to a daily fee - would result in more efficient hearings.

The Home Office has indicated that Phase 3 of the reforms to the Police Complaints and Discipline systems is due to be implemented in early 2019. These come under the category of Police Integrity Reforms and the focus will be on Discipline, Complaints and increased powers for the IOPC.

The Home Office has made 36 Policy Proposals which will have a significant impact on the Complaints and Misconduct system. This will include the transfer of appeals to the Police and Crime Commissioner. PSD will continue to monitor the progress of these reforms and to liaise with the Home Office and the OPCC to manage the change.

As mentioned earlier, it has been agreed at national level that all Forces in England and Wales will now provide the vetting function for the Probation Service. This will undoubtedly lead to a further increase in the demand placed on our Vetting Team. Discussions at national level between the Police and Her Majesty's Prison and Probation Service have included the potential for charges to be applied by Forces. At the time of writing, no decision has been made regarding whether to charge and if so whether to adopt a regional approach and charging structure.

Resource implications

Finance – revenue funding, capital investment, external funding, commissioning, collaboration opportunities etc.

Assets – estates, facilities, IT etc.	<p>Accommodation and equipment will need to be secured for the Public Service Bureau within the PSD setup. This will include transfer of existing infrastructure such as telephone lines and the creation of new email addresses.</p> <p>The current PSD storage facilities are required by Estates for conversion into accommodation. There is a short term need for temporary storage whilst data currently stored can be reviewed for retention or destruction.</p>
Staff - knowledge & skills, capacity, capability, training etc.	As highlighted above it has been identified there is a potential lack of capacity in certain areas of PSD. A full Departmental Review will address these issues and identify whether there is any scope for reallocation of resources within the Department.
Timescales	
Leadership	The PSD continues to provide a range of inputs to new starters, transferees, Special Constables, volunteers and to the Chaplaincy. The Department is also running complaint workshops as part of the newly qualified Inspector and Sergeant courses.
Partners	As of 8th January 2018, the IPCC became the IOPC (Independent Office for Police Conduct). This has seen a structural change and the introduction of a Director for Wales.

Impact considerations	
Risk	
Legal	
Police and Crime Plan	<p>Priority 4 – connecting with communities</p> <p>Providing a professional response to dealing with complaints</p>
Demand	
Governance	
Equality	
Reputation – confidence and satisfaction	
Environmental and sustainability	
Media, communication and engagement	

Senior officer approval

Name: D/Supt Dave Guiney

Signature:

A handwritten signature in black ink, appearing to be 'D Guiney', written over a horizontal line.

Date: 13/02/2018