

PCC Decision Report

Please ensure all sections below are completed

Report reference number: 68/2017

Classification (e.g. Not protectively marked/restricted):

Title of report:

Changes to the Handling of Police Complaints set out in the Policing and Crime Act 2017 and the response by Essex Police

Area of County/Stakeholders affected:

- County wide
- Members of the Public
- Victims and witnesses
- Essex Police including PSD

Report by : Claire Heath (Essex Police)

Date of report: 7 June 2017 – presented to PCC Strategic Board on 15 June 2017

Enquiries to:

Claire Heath – Head of Public Engagement and Customer Service , Essex Police

Susannah Hancock – Chief Executive, OPCC

1. Purpose of the report

See detailed report entitled '*An Overview of the Changes to the Handling of Police Complaints set out in the Policing and Crime Act 2017 and the response by Essex Police*' attached at section 11. This was presented to the PCC's Strategic Board on the 15th June.

- 1.1 The purpose of the Strategic Board report was to inform and update the Police and Crime Commissioner (PCC) and members of the Board on the low-level concerns triage pilot held in force between September 2016 and February 2017. It was intended to assist decision making on the future direction and management of low level concerns and dissatisfaction of service with the force, in line with changes set out in the Policing and Crime Act 2017, part two, Police Complaints, Discipline and Inspection, chapter one, Police Complaints.

2. Background:

- 2.1 The Policing and Crime Act 2017 gives Police and Crime Commissioners the option of new powers to bring the management of low-level complaints into their offices, should they choose to, or to have a stronger role in overseeing them. Changes will co-ordinate and professionalise the management of low-level dissatisfaction with police forces.
- 2.2 Part two of the Act sets out provisions for reform of the police complaints and disciplinary systems to ensure that the public have confidence in their ability to hold the police to account, and that police officers will uphold the highest standards of integrity. The key provisions strengthen the PCC's oversight role of the local complaints system, giving them explicit responsibility for ensuring the effective and efficient delivery of the local police complaints system, and making PCCs the appellate body for those appeals currently heard by Chief Constables.

The Act also enables the PCCs to take on other functions within the complaints system, giving them the option of taking on responsibility for the front-end of the complaints system and the responsibility for all duties regarding contact with the complainant.

There are therefore three main options that the PCC can consider ranging from option one which is mandatory to hold the Chief Constable in relation to handling complaints to option three where PCC's take on the full responsibility for the complaints process.

1. Option 1: (Mandatory): Statutory duty to hold the Chief Constable (CC) to account for the exercise of the Chief Constable's functions in relation to handling complaints.

Hearing appeals/reviews that would previously have been the responsibility of the Chief Constable. All PCCs will need to do this as a minimum.

2. Option 2: PCCs take on Triage function only. Duty to make initial contact with complainant to understand how best their issues might be resolved. Ability to resolve complaints outside of Schedule 3 to the 2002 Act (where complainant agrees). The recording of complaints (and related notification duties).
3. Option 3: PCCs take on responsibility for all complaints process. Model two above and also responsibility for keeping complainant informed throughout the handling of the complaint including the outcome and the right of review.

2.3 The report to the Strategic Board:

- Provides information about the changes to complaints introduced as a part of the Policing and Crime Bill 2017 and the options available for the Police and Crime Commissioner to oversee or manage low-level concerns and dissatisfaction.
- Describes the aims, approach and outcomes from a new model piloted in the force between September 2016 and February 2017 to manage and resolve low-level complaints and dissatisfaction.
- Makes recommendations for the future management of low-level concerns and dissatisfaction with consideration to their relationship with the force proposal for a future model for seamless victim care, contact and support.
- Outlines in brief the resource and costs required in any future business case to implement the agreed model.

3. Recommendations

Based on the results of the pilot outlined in the report, it is recommended that:

- Option one of the Policing and Crime Act 2017 (as set out in paragraph 2.2 above) is agreed as the preferred approach for Essex. This means that the management of complaints will remain within Essex Police. As per the legislation, the PCC will have a strengthened role in the oversight of the wider local police complaints system. The PCC will also take on the appeal and review function.
- The Low Level Complaints pilot be rolled out across Essex police including the additional resource of 2 FTE members of staff funded by Essex Police.

- The PCC commission a formal review of the new model in 12 months' time to review effectiveness

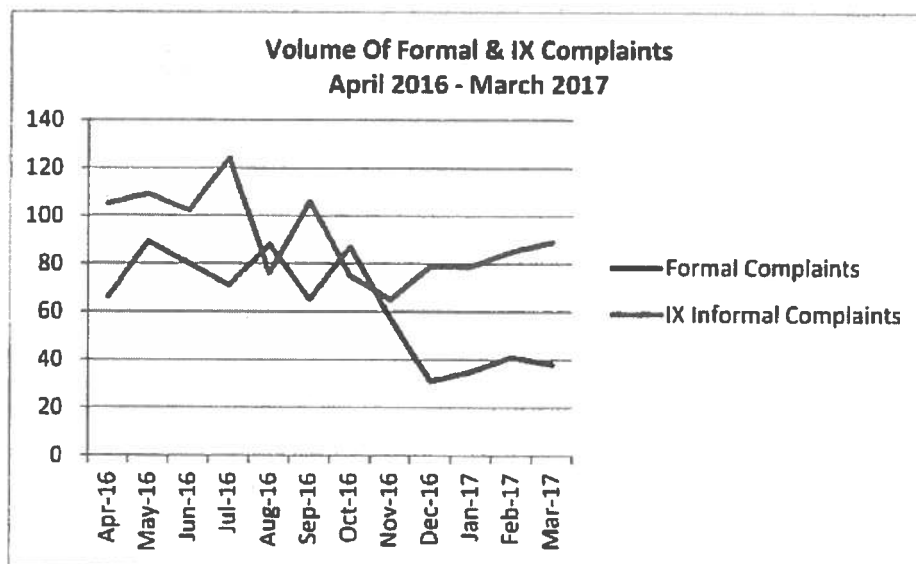
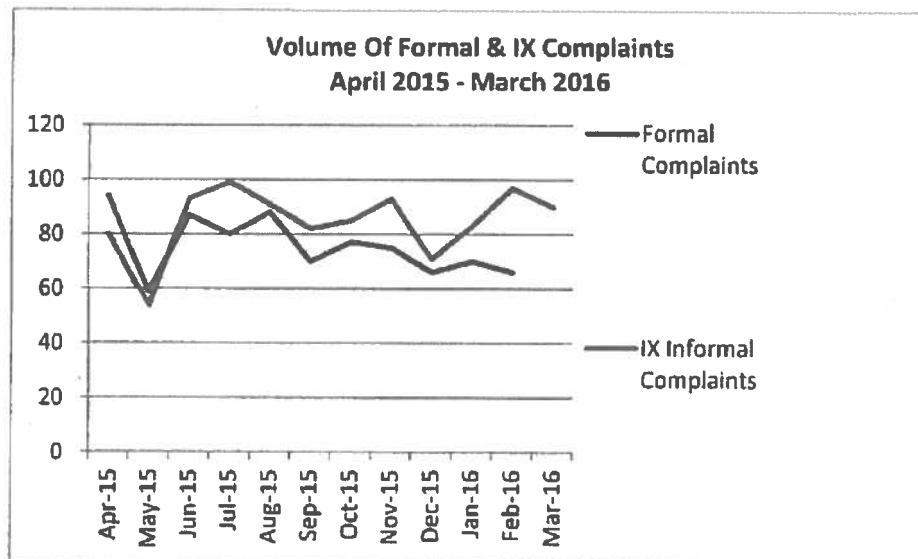
4. Benefits of Proposal

The benefits of the low-level complaints and dissatisfaction pilot included benefits for members of the public, victims and witnesses, Essex Police and specifically the Professional Standards Department (PSD), Local Policing Teams and other Commands by:

1. Enabling the skilled resource within PSD to manage the more serious elements of complaints around officer conduct.
2. Reducing the volume of low level concerns, dissatisfaction and formal complaints being sent to operational officers to investigate would allow a more cost effective use of their resource and support 'more time to fight crime.'
3. More effective record keeping provides the triage team a clearer insight with the ability to link concerns and remove any duplication of effort and unnecessary waste of police resource.

The charts below compare the level of formal complaints and IX files recorded by PSD month by month during 2015 and 2016. They show that during the pilot period (September 2016 – March 2017):

1. the total number of complaints (formal and informal) decreased by 151 (14% overall reduction)
2. number of formal complaints decreased by 128 (27% reduction)
3. the number of IX informal complaints decreased by 23 (4% reduction)



5. Background and proposal

The pilot commenced in September 2016 with a soft internal launch to support the management of unknown volumes. For the purposes of the pilot, a low-level concern is defined as being *'any expression of dissatisfaction by a member of the public about the quality of service they have received from the force and which they accept informal resolution as satisfactory service recovery.'*

The success of the pilot would be evaluated by the measures set out in the terms of reference. These included:

1. A reduction in the number of official complaints being progressed by the Professional Standards Department
2. An Improvement in victim satisfaction

The role of the triage falls within the period prior to the statutory timeline within which a complaint must be recorded (10 days). The aim of the Quality of Service Team is to resolve low-level concerns or dissatisfaction with service informally, 'there and then' to the satisfaction of the complainant. The majority of their role is conducted over the telephone allowing personal contact and more effective management of expectations. Matters escalated from the team to other departments and investigating officers for service recovery could involve the return of property after a police investigation, concerns around the issuing of a road traffic ticket or relate to victims seeking an update on the progress of enquiries made as a result of their investigation. The Quality of Service Team will track the progress of matters escalated to ensure that members of the public and victims of crime receive a timely update, negating the need for them to make further contact.

The team's focus is on delivering the best possible service that promotes satisfaction and confidence; and our standards and commitments within the Code of Ethics and the Police and Crime Plan. They apply the following principles of good complaint handling;

1. Getting it right
2. Being customer focused
3. Being open and accountable
4. Acting fairly and proportionately
5. Putting things right
6. Seeking continuous improvement

During the pilot period, all concerns and dissatisfaction relating to an on-going incident has remained managed by the FCR and recorded on STORM.

The data referred to in the report and in the charts above, evidences that the central management of low level concerns and dissatisfaction has helped deliver some of the proposed benefits namely;

1. Enabling the skilled resource within PSD to manage the more serious elements of complaints around officer contact.
2. Any reduction in the volume of low level concerns, dissatisfaction and formal complaints being sent to operational officers to investigate would allow a more cost effective use of their resource and support 'more time to fight crime.'

Placing the Quality of Service Team at the front end of service on the 101 telephone entry point has made it much easier for members of the public to speak to someone about their concern.

6. Police and Crime Plan

The recommendation is relevant to the Police and Crime Plan and the victim centric approach set out with in plan that puts victims at the heart of what we do as described on page seven of the plan.

7. Police Operational Implications

There are no specific operational implications identified as part of the pilot and wider roll out.

7. Financial Implications

There are no financial implications other than those relating to the additional resource outlined in the paper.

A permanent model would require an additional two members of staff to permanently centralise the management of low-level concerns and effectively manage the demand and resolution. Two additional scale three members of staff would cost £45,212 taken from the Finance 2017/18 Ready Reckoner. This is based on the work undertaken during the pilot to match the volume of public contact work to the resource available and to ensure the current level of abandoned calls (around 25% can be answered and resolved

The additional resource will be allocated from within the existing Essex Police staff budget as part of ongoing alterations to the Force Operating Model.

8. Legal Implications

The Policing and Crime Act 2017 further reforms policing and enables changes to build capability, improve efficiency, increase public confidence and further enhance local accountability. The Act is formed of nine parts. Part two, makes provision about the handling of Police Complaints, Discipline and Inspection to ensure the public have confidence in their ability to hold the police to account, and that police officers will uphold the highest integrity.

The Act gives Police and Crime Commissioners new powers to bring the management of low-level complaints into their offices, should they choose to, or to have a stronger role in overseeing them. Changes will for the first time co-ordinate and professionalise the management of low-level dissatisfaction with police forces.

The Police Reform Act 2002, defines a complaint as '*an expression of dissatisfaction by a member of the public about the conduct of a person serving with the police.*' The Independent Police Complaints Commission (IPCC)

Statutory Guidance to the Police Service on the handling of complaints 2015 sets out the framework for the recording and handling of complaints.

The Policing and Crime Act 2017 broadens the definition of a complaint to, '*any expression of dissatisfaction with the police force,*' and it could include customer service or policing policy.

8. Staffing and other resource implications

The pilot results showed the positive impact the new model had on the volume of complaints presented to and investigated by PSD as shown in the graphs under section four which show overall reduction on 14% (for formal and informal complaints) was achieved. This in turn has freed up skilled resources from PSD to concentrate on the more serious investigations and reduced the number of complaints requiring oversight and investigation by police Inspectors based on geographical policing areas and HQ commands.

There are not any staffing and other resource implications other than those relating to the additional resource outlined in financial implications set out above.

10. Equality and Diversity implications

There are not any Equality and Diversity implications.

The Quality of Service team work to ensure access to services and support are fair and equitable for all members of the public, victims and witnesses.

11. Background papers

- Paper presented to the PCC Strategic Board and the associated appendices are attached below.



Ag Item 9 LLC -
Transformation Board



Ag Item 9a Low
Level Concerns Pilot f



Ag Item 9 Appendix
D.docx



Ag Item 9 Appendix
C.DOCX



Ag Item 9 Appendix
B.DOCX



Ag Item 9 - Appendix
A.DOCX

Report Approval

The report will be signed off by the OPCC Chief Executive and Treasurer, prior to review and sign off by the PCC / DPCC .

Chief Executive/M.O

Sign: 

Print: *S. Hancock*

Chief Financial Officer/Treasurer

Sign: 

Print: *CHARLES R GARNETT*

Publication

Is the report for publication?

YES

☒

NO

☐

If 'NO', please give reasons for non-publication (state 'None' if applicable)

.....
.....
If the report is not for publication, the Chief Executive will decide if and how the public can be informed of the decision.

Redaction

If the report is for publication, is redaction required:

1. Of Decision Sheet

YES

☒

NO

☐

2. Of Appendix

YES

☒

NO

☐

If 'YES', please provide details of required redaction:

..... *Redact name of officer at 6.8 of Report*

Date redaction carried out:

Treasurer / Chief Executive Sign Off – for Redactions only

If redaction is required, Treasurer or Chief Executive are to sign off that redaction has been completed.

Sign:

Print:

Chief Executive/Treasurer

Date signed:

Decision and Final Sign Off

I agree the recommendations to this report;

Sign:

Print:

PCC/Deputy PCC

Date signed:

I do not agree the recommendations to this report because;

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Sign:

Print:

PCC/Deputy PCC

Date signed:

Strategic Change Team

An Overview of the Changes to the Handling of Police
Complaints set out in the Policing and Crime Act 2017
and the response by Essex Police

Low Level Concerns

PCC Strategic Board Meeting

15th June 2017

Claire Heath
Version: 10.0 7th June 2017

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1.0 Executive Summary

- 1.1 The purpose of this report is inform and update the Police and Crime Commissioner (PCC) and members of the Strategic Board on the low level concerns triage pilot held in force between September 2016 and February 2017. It is intended to assist decision making on the future direction and management of low level concerns and dissatisfaction of service with the force, in line with changes set out in the Policing and Crime Act 2017, part two, Police Complaints, Discipline and Inspection, chapter one, Police Complaints. **Appendix A¹**
- 1.2 The Act gives Police and Crime Commissioners new powers to bring the management of low level complaints into their offices, should they choose to, or to have a stronger role in overseeing them. Changes will for the first time co-ordinate and professionalise the management of low level dissatisfaction with police forces.
- 1.3 There are three options set out in the Act for the PCC to consider:
 1. (Mandatory): Statutory duty to hold the Chief Constable (CC) to account for the exercise of the Chief Constable's functions in relation to handling complaints. Hearing appeals/reviews that would have been the responsibility of the Chief Constable in the current system. All PCCs will need to do this as a minimum.
 2. PCCs take on Triage function only. Duty to make initial contact with complainant to understand how best their issues might be resolved. Ability to resolve complaints outside of Schedule 3 to the 2002 Act (where complainant agrees). The recording of complaints (and related notification duties).
 3. PCCs take on responsibility for all complaints process. Model two above and also responsibility for keeping complainant informed throughout the handling of the complaint including the outcome and the right of review.
- 1.4 This paper seeks to;
 1. Provide information about the changes to Part 2 of the Policing and Crime Bill 2017 and the options available for the Police and Crime Commissioner to oversee or manage low level concerns and dissatisfaction.
 2. Describe the aims, approach and outcomes from a new model piloted in the force between September 2016 and February 2017 to manage and resolve low level complaints and dissatisfaction.
 3. Make recommendations for the future management of low level concerns and dissatisfaction with consideration to their relationship with the force proposal for a future model for seamless victim care, contact and support.
 4. Outline in brief the resource and costs required in any future business case to implement the agreed model.

¹ Shows in bold the provisions that this pilot has considered, a-f

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- 1.5 Following early consultation with the Office of the Police and Crime Commissioner, the two main options for consideration are:

Option One:

The PCC taking responsibility for the front-end of the complaints system which includes responsibility for all duties regarding contact with the complainant, administration and management of this function from within their offices and by their staff or

Option Two:

PCC's leaving the management of complaints within the force whilst strengthening their oversight role of the local complaints system, giving them explicit responsibility for ensuring the effective and efficient delivery of the police complaints system.

- 1.6 A new model was piloted by Essex Police from September 2016 – February 2017 to manage and resolve low-level concerns and complaints. The pilot has:

1. Provided a single point of contact for all reports of dissatisfaction and concerns, ensuring resolution by a professional customer service team member to the satisfaction of the complainant.
2. Improved the way members of the public, victims and witnesses can raise a concern or dissatisfaction with the service received. Easy and direct ways to speak to a member of a dedicated professional customer service team have been introduced. These include improved access to information and online reporting and the ability to select the team direct from the main switchboard menu option.
3. Improved the level of information about service failures known to the force and ensured action can be taken to prevent similar reports by making improvements to the way the service is delivered.
4. Reduced the total number of complaints (formal and informal) by 151 (14% overall reduction)
 - the number of formal complaints has decreased by 128 (27% reduction)
 - the number of IX informal complaints has decreased by 23 (4% reduction)

- 1.7 Based on the results of the model the force has implemented to pilot new ways to manage, record and resolve low level concerns and dissatisfaction it is **recommended that the force establishes the triage team as part of the force operational structure.**

- 1.8 It is expected that a permanent model would require an additional two members of staff to permanently centralise the management of low level concerns and effectively manage the demand and resolution. Two additional scale three members of staff would cost £45,212 taken from the Finance 2017/18 Ready Reckoner. This is based on the work undertaken during the pilot to match the volume of public contact work to

the resource available and to ensure the current level of abandoned calls (around 25% can be answered and resolved.

2.0 Background

- 2.1 The Policing and Crime Act 2017 further reforms policing and enables changes to build capability, improve efficiency, increase public confidence and further enhance local accountability. The Act is formed of nine parts. Part two, makes provision about the handling of Police Complaints, Discipline and Inspection to ensure the public have confidence in their ability to hold the police to account, and that police officers will uphold the highest integrity.
- 2.2 The Act gives Police and Crime Commissioners new powers to bring the management of low level complaints into their offices, should they choose to, or to have a stronger role in overseeing them. Changes will for the first time co-ordinate and professionalise the management of low level dissatisfaction with police forces.
- 2.3 The Police Reform Act 2002, defines a complaint as '*an expression of dissatisfaction by a member of the public about the conduct of a person serving with the police.*' The Independent Police Complaints Commission (IPCC) Statutory Guidance to the Police Service on the handling of complaints 2015 sets out the framework for the recording and handling of complaints.
- 2.4 The Policing and Crime Act 2017 broadens the definition of a complaint to, '*any expression of dissatisfaction with the police force,*' and it could include customer service or policing policy.
- 2.5 An early meeting between the force (Claire Heath, Head of Public Engagement and Customer Service and Superintendent Cat Barrie, Head of Professional Standards) and the Office of the Police and Crime Commissioner (OPCC) in June 2016 discussed best practice for handling low level concerns and options that could be progressed by the force alongside the OPCC in preparation for future changes. They agreed to;
 1. Scope a triage pilot to test the concept of the central management of low level concerns and dissatisfaction.
 2. Utilise the existing resource within the headquarters based Quality of Service Team to test the model within the agreed terms of reference. (Appendix B)
- 2.6 The proposed benefits of the successful triage of low level complaints and dissatisfaction referred to those for the Professional Standards Department (PSD), Local Policing Teams and other Commands. These are;
 1. Enabling the skilled resource within PSD to manage the more serious elements of complaints around officer conduct.
 2. Any reduction in the volume of low level concerns, dissatisfaction and formal complaints being sent to operational officers to investigate would allow a more cost effective use of their resource and support 'more time to fight crime.'

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3. More effective record keeping which would give the triage team a clearer insight with the ability to link concerns and remove any duplication of effort and unnecessary waste of police resource.
- 2.7 The central management of low level concerns and dissatisfaction gives the force an opportunity to put things right, seek early resolution to those concerns raised by the public and victims of crime and maintain their confidence levels in our ability to do so. This increased level of engagement enriches our level of insight and will inform where improvements are needed in the delivery of our policing services.
- 2.8 The ethos behind the pilot was to develop a new customer facing triage model to manage low level concerns and dissatisfaction from members of the public concerning Essex Police. The model would have the ability to tackle and resolve these in a proportionate, efficient and effective way and deliver the best possible standards to improve victim satisfaction and increase public confidence.
- 2.9 Outcomes from the pilot would seek to determine better information about the volume and categories of low level concerns and dissatisfaction and make recommendations as to how low level concerns and dissatisfaction with our service could be managed in a future model. This would inform and assist the force and OPCC decision making in advance of the commencement of this provision of the Act in 2018.
- 2.10 The Quality of Service Team is an established customer focused team which reports to the Head of Public Engagement and Customer Service within the Strategic Change and Performance Directorate led by Dr Victoria Harrington. It is an independent team sitting outside of the Contact Management Command to monitor and ensure consistent and professional customer service across the force.
- 3.0 **Pre-Pilot Position 2016**
 - 3.1 The proposal to pilot a new delivery model identified that low level concerns and reports of dissatisfaction with service were routed to many different areas across the force, with access across a variety of different entry points including switchboard, direct to officer and police station front counters.
 - 3.2 Onward routing and resolution was not captured across a single system making it difficult to understand the effectiveness or otherwise of our low level complaint handling, the volumes, themes, resolution methods and timescales as well as the ability to gain insight to improve service delivery.
 - 3.3 Initial base lining work which took place before the start of the pilot estimated that 900 telephone calls from members of the public were received across the three monitored entry routes;
 1. 500 calls each month into the Quality of Service Team, 10% of which required escalation to support service recovery.
 2. 200 referrals into PSD which fell outside of the complaints process for local community resolution.

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3. 200 incidents flagged on STORM² by the Force Control Room (FCR) relating to dissatisfaction.
- 3.4 There is no single system for capturing any other calls which are routed to or received direct by other parts of the organisation relating to low level concerns or dissatisfaction.
- 3.5 Access was given to the Quality of Service Team to the Centurion IT³ system used by PSD. Training was provided by PSD to ensure the teams' compliance in escalating those more formal matters around conduct required to be sent to them and recorded.
- 3.6 Manual Excel sheets were used by the Quality of Service Team to record information captured by them in respect of all contacts from members of the public with the team.
- 4.0 **Pilot and approach**
- 4.1 The pilot commenced in September 2016 with a soft internal launch to support the management of unknown volumes. For the purposes of the pilot, a low level concern is defined as being *'any expression of dissatisfaction by a member of the public about the quality of service they have received from the force and which they accept informal resolution as satisfactory service recovery.'*
- 4.2 The success of the pilot would be evaluated by the measures set out in the terms of reference. These included:
 1. A reduction in the number of official complaints being progressed by the Professional Standards Department
 2. An Improvement in victim satisfaction
- 4.3 The role of the triage falls within the period prior to the statutory timeline within which a complaint must be recorded (10 days). The aim of the Quality of Service Team is to resolve low level concerns or dissatisfaction with service informally, 'there and then' to the satisfaction of the complainant. The majority of their role is conducted over the telephone allowing personal contact and more effective management of expectations. Matters escalated from the team to other departments and investigating officers for service recovery could involve the return of property after a police investigation, concerns around the issuing of a road traffic ticket or relate to victims seeking an update on the progress of enquiries made as a result of their investigation. The Quality of Service Team will track the progress of matters escalated to ensure that members of the public and victims of crime receive a timely update, negating the need for them to make further contact.
- 4.4 The team's focus is on delivering the best possible service that promotes satisfaction and confidence; and our standards and commitments within the Code of Ethics and the Police and Crime Plan. They apply the following principles of good complaint handling;
 1. Getting it right
 2. Being customer focused
 3. Being open and accountable

² This is an incident management system used in the FCR to record and manage on-going incidents

³ This system is a records management system used by PSD to record and track complaints

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4. Acting fairly and proportionately
5. Putting things right
6. Seeking continuous improvement

4.5 The working hours of the team are between 9.30am and 5.30pm, Monday to Saturday with the exception of bank holidays. During the pilot period, the team has been resourced with four full time existing Quality of Service Officers and supported by one Quality of Service Manager whose role included the management of front counter teams across the county. There were no additional costs associated with the pilot.

4.6 During the pilot period, all concerns and dissatisfaction relating to an on-going incident has remained managed by the FCR and recorded on STORM.

4.7 Parallel to the low level concerns pilot within the Quality of Service Team, a triage system within PSD was adopted in Autumn of 2016 to address low level complaints directly with the public, if ethical and appropriate to do so.

5.0 Update position

5.1 Interim reports dated November 2016 and February 2017 have supported regular review meetings between Claire Heath and the OPCC and provided updates on the following areas.

5.2 Revision was made to the complaints and concerns/dissatisfaction online forms on the Essex Police website. This provides better guidance and explains the difference between the two. In addition, a slight revision was made to the contact form which has increased the volume of e-mail communications which are handled within the Quality of Service Team on behalf of the force. It is not known if this increase is additional contact into the force or that this online communication has reduced for example telephone contact in other business areas. This has however, made it easier for the public to raise a concern or a complaint using online methods.

5.2 In December 2016, improvements were made to our telephone system to allow the public to select the Quality of Service team from a menu option when using 101 if they wished to speak to someone about a concern about the service they had received. The recording on the telephone option three now says, *'If you have previously reported something to us and you are not satisfied with our service please press 3 to speak to a member of the Quality of Service Team.'* If all members of the team are busy and engaged on calls there is a facility to leave a message and a level of service informs the caller as to when they can expect to receive a call back from the team.

5.4 Resilience is provided by the switchboard to manage continuity of service outside of business hours and on Mondays due to the teams current shift pattern. Data captured within the Liberty Netcall system⁴ evidences the increase in call volume into the team since adding the option to those on the 101 service. (This data is referred to in paragraph 6.3).

⁴ IT system which monitors and reports on 101 call volume

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- 5.5 The pilot had highlighted a need to review the Excel sheets used by the Quality of Service Team to ensure proportionate recording and to evidence the volume of concerns and dissatisfaction escalated out across the force to support service recovery. All telephone contact received into and made by the team is recorded on the forces red box system⁵ and can be accessed to support quality assurance and support any dissatisfactions or complaints
- 5.6 The Quality of Service Team will pilot the use of Live Chat in the Autumn 2017 enabling a further channel of communication into the team.
- 5.7 PSD were consulted as part of the pilot reviews and they confirmed that there were no areas requiring any progress improvement or better management from within the Quality of Service Team. They highlighted the below as specific benefits of the pilot.
1. Improved knowledge and understanding gained by the team which has enhanced their ability to confidently resolve concerns and dissatisfaction.
 2. There has been no delay in escalating any complaint onto PSD.
 3. Better sharing of information between the two teams which supports force learning and identification of repeat officers, staff and complainants.

6.0 Pilot Information and Results

- 6.1 The Terms of Reference set out the methods of evaluating the pilot as set out below:
1. Conducting regular audit of cases to ensure appropriate outcomes e.g. cases that should have been referred to PSD were in fact referred.
 2. Producing weekly statistics to evidence the number of successful early interventions by the triage team.
 3. Improvement in victim satisfaction and any impact on public confidence should be measured by carrying out a survey of complainants.
 4. Referencing to the future public contact programme and greater efficiency to ensure the public are better informed and updated in an effort to reduce the volume of low level satisfaction.
 5. Considering what best practice exists in other forces to inform and consider this alongside any recommendations in a future review.
 6. Any reduction in the IPCC quarterly statistics of official complaints being generated in force.
- 6.2. The pilot has resulted in closer working relationship between the Quality of Service team and PSD. The Quality of Service Manager has ensured that any cases required

⁵ This is a system used in the force to record calls received and made to members of the public and is used for all calls which are presented to the Switchboard, FCR, Crime Bureau and Quality of Service Team.

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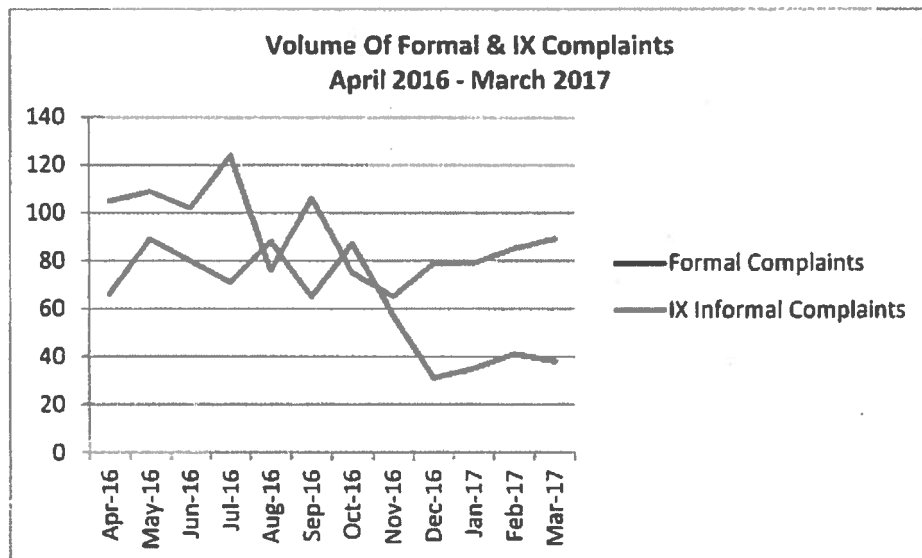
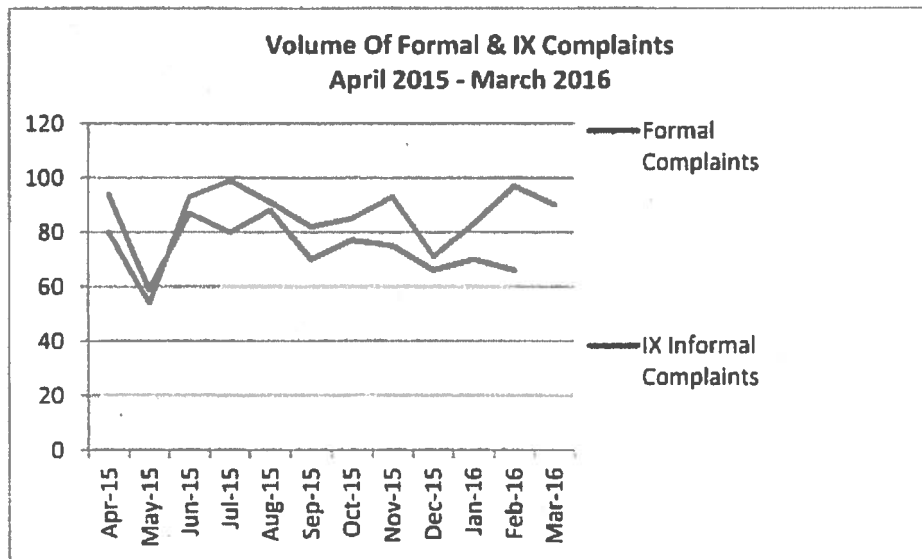
to be escalated to PSD as part of the process have been in a timely manner causing no undue distress to the complainant.

- 6.3 Parallel to the low level concerns pilot within the Quality of Service Team, a triage pilot was adopted within PSD in Autumn 2016 to address low level complaints directly with the public, if ethical and appropriate to do so. This requires early intervention with the complainant, understanding how the matter they are reporting could be satisfactorily resolved. Where the team have been able to satisfactorily resolve these, they are recorded as informal complaints, known as IX files. Those not resolved and required to be escalated are forwarded by PSD to their points of contact across the force for investigation. The below data from Centurion evidences the volumes of formal complaints and informal IX complaints from April 2015 – March 2017. Further PSD supporting data is attached as Appendix C.
- 6.4 The charts below compare the level of formal complaints and IX files recorded by PSD month by month during 2015 and 2016. They show that during the pilot period (September 2016 – March 2017):

1. the total number of complaints (formal and informal) decreased by 151 (14% overall reduction)
2. number of formal complaints decreased by 128 (27% reduction)
3. the number of IX informal complaints decreased by 23 (4% reduction)

	Data from Centurion IT system used by PSD					
	Formal Complaints		IX Informal Complaints		Total Complaints	
	2015	2016	2015	2016	2015	2016
April	94	66	80	105	174	171
May	59	89	54	109	113	198
June	87	80	93	102	180	182
July	80	71	99	124	179	195
August	88	88	91	76	179	164
September	70	65	82	106	152	171
October	77	87	85	75	162	162
November	75	57	93	65	168	122
December	66	31	71	79	137	110
January	70	35	83	79	153	114
February	66	41	97	85	163	126
March	58	38	90	89	148	127
Total	890	748	1018	1094	1908	1842

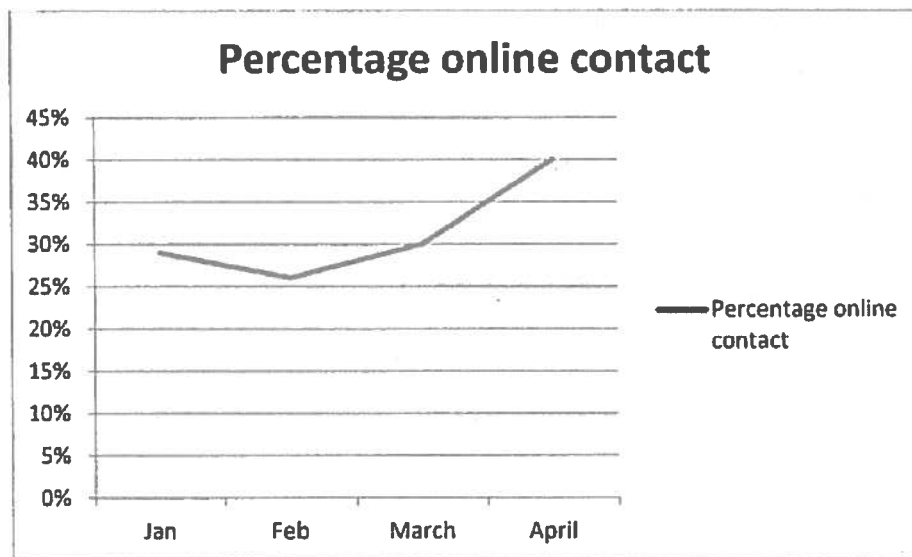
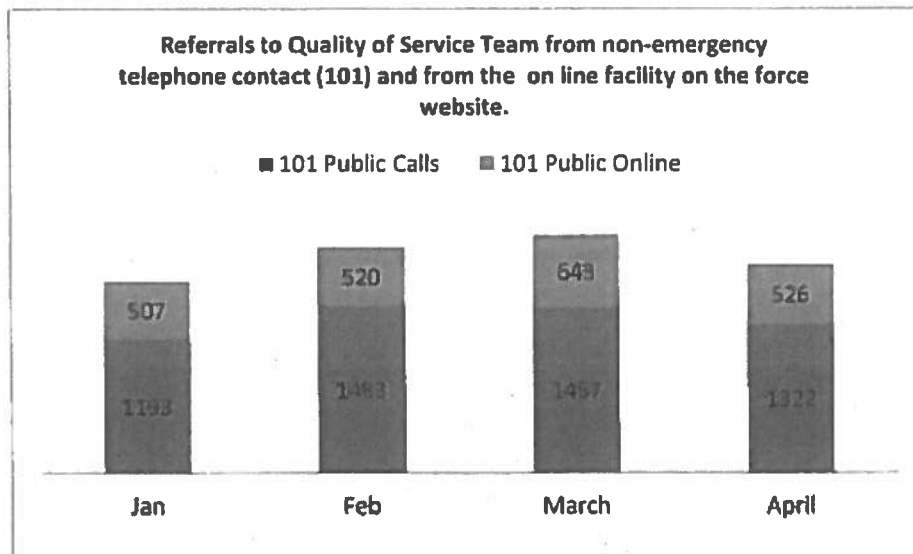
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- 6.5 Whilst it is evident that this small team have dealt with a high volume of contact with the public during the pilot period, it is difficult to quantify the impact that this has had on victim satisfaction and public confidence. The pilot has not included any formal feedback with those who have engaged with the team but this would be recommended as part of any future model.
- 6.6 The data from netcall evidences the public demand placed upon the Quality of Service Team since the introduction of the self-selection option on 101 in December 2016.
- 6.7 The data in Appendix D and shown in the charts below is taken from the Liberty Netcall facility which monitors all public calls routed into the team via the 101 selection, online data and Quality of Service Team records. In December 2016, improvements were made to our telephone system to allow the public to select the Quality of Service team from a menu option when using 101 if they wished to speak

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to someone about a concern about the service they had received. The first full month's data is available from January 2017.



A slight revision was made to the contact form which has increased the volume of e-mail communications which are handled within the Quality of Service Team on behalf of the force. It is not known if this increase is additional contact into the force or that this online communication has reduced for example telephone contact in other business areas.

- 6.7 Victims of crime contacting the Quality of Service Team to either seek an update or speak to the officer allocated their crime remains the main reason for contact with the Quality of Service Team. The Quality of Service Manager has during the pilot period been able to monitor any fluctuations in the demand for service for other departments across the force and discuss the reasons for this and any possible changes required. An example of this relates to the CRASH reporting system used to report accidents online. Whilst receiving an automated response and web reference, members of the public reporting such incidents to police were initiating contact to ascertain an update

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on the matter reported. This feedback influenced a positive change to the automated response by adding an expected service level. A further example relates to applications for criminal records checks via the disclosure barring service. The Quality of Service Team after speaking with individual members of the public and businesses seeking an update from Essex Police approached the Vetting Department and changes have led to letters being sent which set out the expected time frames in which they can expect a response.

- 6.8 It is however worth noting that no complaints have been made or dissatisfaction has been raised about the level of service given by members of the Quality of Service Team. The skill that each individual member of the team has developed, their ability to deal with the most challenging of calls and resolve these is a credit to them and the force. The team are frequently thanked by members of the public and victims of crime for the courteous way in which they have spoken to them, explained police processes to them in a language that they understand and dealt with their concerns so efficiently. An example of a thank you is: *[redacted] has been a brilliant help to me and my family and I would like to thank her for all her support she is very positive and gives me piece of mind she is brilliant.'*

* Quality
of Service
Officer

7.0 Evaluation and proposed model

- 7.1 The data referred to in Appendix C and in the chart at paragraph 6.6 evidences that the central management of low level concerns and dissatisfaction has helped deliver some of the proposed benefits namely;

1. Enabling the skilled resource within PSD to manage the more serious elements of complaints around officer contact.
2. Any reduction in the volume of low level concerns, dissatisfaction and formal complaints being sent to operational officers to investigate would allow a more cost effective use of their resource and support 'more time to fight crime.'

- 7.2 Placing the Quality of Service Team at the front end of service on the 101 telephone entry point has made it much easier for members of the public to speak to someone about their concern. This has increased the demand and consequently the ability of the existing team to manage the demand with the current resource. It is a credit to the team that they have professionally managed and supported the demand for their service. This has been acknowledged by visits from Chief Officers and HMIC during the pilot period. Their core responsibility is to act as a central co-ordination point for all members of the public, victims and witnesses who have an enquiry about their contact with the force. Whilst the 101 routing has supported the aim of centralising the management of low level concerns and dissatisfaction as mentioned in this report, it has reduced the team's capability to deal with their wider role. Other functions such as quality assurance of calls into switchboard and crime bureau, surveying BME victims of crime and quality assuring standards across our webpages has ceased.

- 7.3 In measuring the success of this pilot we need to also consider what is not quantifiable at the time of this report, the satisfaction levels of those who have engaged with the Quality of Service Team and their confidence in us as a force. The

central management of low level concerns has provided resilience to our front line resourcing. It has provided the public and victims of crime a named point of contact, who has given them the time to explain their reasons for their dissatisfaction and the ability to work with them to resolve it as quickly as possible.

- 7.4 It is proposed that the central management of low level concerns and dissatisfaction remains within the remit of the Quality of Service Team. The independency and high level of service that this team provides to the public, victims and witnesses of crime is integral in enabling the force to deliver its promises it has made and those within the Police and Crime Plan. HMIC will continue to inspect how the force is using the feedback it receives to deliver a better police service. It is vital that the force continues to gain from the insight from feedback from members of the public, victims and witnesses to improve its design and delivery of future services.
- 7.5 Whilst as a force we continue to work hard in support of all our victims of crime, the work that the Quality of Service team delivers plays an integral role in supporting the forces' compliance of the Victims Code. We have already identified that despite renewed energy and focus we have not consistently been able to maintain a good service nor achieved the satisfaction and confidence levels that the force aspires to. Some victims unfortunately are forced to initiate contact into force to ascertain what is happening next and why and seek an update about their investigation. The management of low level concerns and dissatisfaction has a relationship with the future model for better victim contact, care and support which will make provision for a tailored service to victims of crime from initial contact until the conclusion of their case.

8.0 Decision and recommendation

- 8.1 The Act gives Police and Crime Commissioners new powers to bring the management of low level complaints into their offices, should they choose to, or to have a stronger role in overseeing them.
- 8.2 There are a range of options that members of the Board could consider in relation to the key provisions set out in Chapters 1 to 4 of Part two of the Act.
- 8.3 The two main options for consideration are:

Option One:

The PCC taking responsibility for the front-end of the complaints system and responsibility for all duties regarding contact with the complainant and administering and managing this function from within their offices and by their staff or

Option Two:

PCC's leaving the management of complaints within the force whilst strengthening their oversight role of the local complaints system, given them explicit responsibility for ensuring the effective and efficient delivery of the police complaints system.

- 8.4 Based on the results of the changes to the way Essex Police and the model the force has implemented to pilot new ways to manage, record and resolve low level concerns

Low Level Concerns Report

and dissatisfaction; and from the results of the interim reports provided to the OPCC it is recommended that the force is asked to bring a business case to establish the triage team as part of the force operational structure. In support of this work the new Service Improvement Manager has been tasked with a review of the Quality of Service Team.

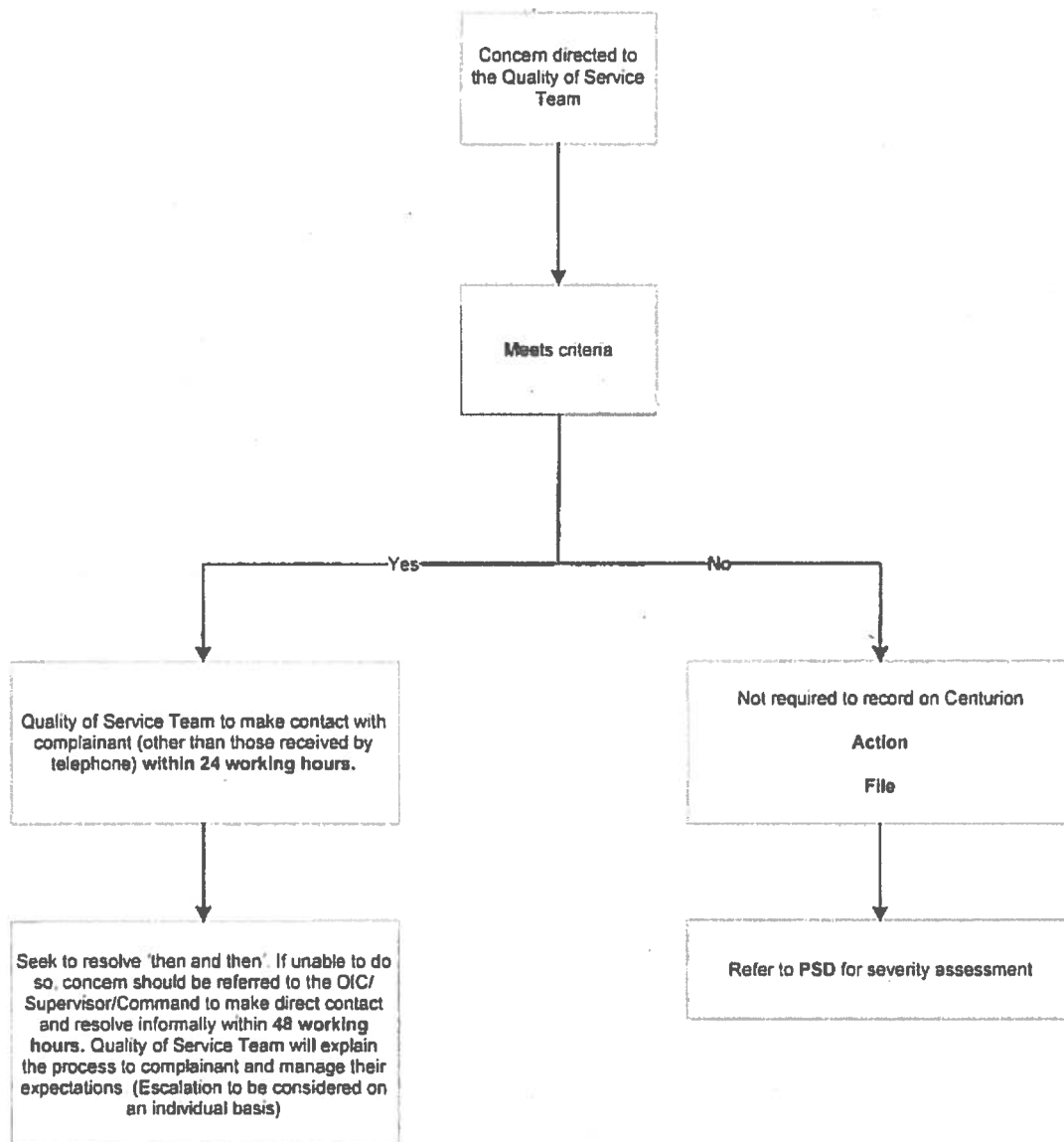
- 8.5 It is expected that a permanent model would require an additional two members of staff to permanently centralise the management of low level concerns and effectively manage the demand and resolution. Two additional scale three members of staff would cost £45,212 taken from the Finance 2017/18 Ready Reckoner. This is based on the work undertaken during the pilot to match the volume of public contact work to the resource available and to ensure the current level of abandoned calls (around 25% can be answered and resolved).
- 8.6 The team would continue to use Excel spreadsheets to manage the contact and resolution prior to the introduction of the Customer Relationship Management System (CRM) which is currently being scoped by the Essex/Kent Collaboration Team for implementation in 2019. The addition of a user friendly CRM would enhance the level of reporting available about the volume, management and resolution of all low level concerns and dissatisfaction.
- 8.7 It is proposed that FCR continue to record and manage any low level concerns and dissatisfactions relating to on-going incidents as they currently do. The future of our FCR is part of the current work being reviewed by the joint Essex and Kent Collaboration Team.



Quality of Service Team

Low Level Concerns Pilot – Triage Action Flowchart

A low level concern is defined as any expression of dissatisfaction by a member of the public about the Quality of Service they have received from the force and which they accept informal resolution as satisfactory recovery.



APPENDIX A

Part 2: Police discipline, complaints and inspection

Chapters 1 to 4: Police complaints, police super-complaints, whistle-blowing and discipline

6. Chapters 1 to 4 of Part 2 of the Bill give effect to the Government's commitment to "overhaul the police complaints system". The key provisions:

- a) **Strengthening PCCs' oversight role of the local complaints system, giving them an explicit responsibility for ensuring the effective and efficient delivery of the local police complaints system, and making PCCs the appellate body for those appeals currently heard by chief constables.**
- b) **Enabling PCCs to take on other functions within the complaints system, giving them the option of taking on responsibility for the front-end of the complaints system and responsibility for all duties regarding contact with the complainant.**
- c) **Clarifying the definition of a complaint – currently defined in section 12 of the Police Reform Act 2002 as 'any complaint about the conduct of a person serving with the police' – to one that defines a police complaint broadly as 'an expression of dissatisfaction with a force'.**
- d) **Retaining and clarifying the focus on immediate resolution of customer service issues where appropriate, before such issues become complaints.**
- e) **Removing the non-recording categories (such as vexatious and out of time complaints) so that any issue that is not possible to resolve immediately or that the complainant wants recording, is recorded.**
- f) **Removing the opaque categorisation for handling complaints – local resolution, local investigation, disapplication, discontinuance – and replacing this with statutory duties based on taking "reasonable and proportionate" action to resolve a complaint.**
- g) **Streamlining the complex appeal process so that there is one appeal point at the outcome of the complaint.**
- h) **Extending the disciplinary regime to former officers where an allegation arose before they resigned or retired, or arose within a period of time following their resignation of retirement;**
- i) **Creating a statutory framework for the College of Policing to receive, hold, make available and, in some circumstances, publish details from a "police barred list" of former members of police forces, former special constable and former members of the civilian staff of police forces who have been dismissed or who would have been dismissed had they not resigned or retired.**

- j) Allowing for regulations to be made to require the IPCC to investigate all chief officer misconduct allegations (including gross misconduct).
- k) Protecting the identity of a whistle-blower by allowing the IPCC to control who in a police force is notified of an independent investigation and obtain information and evidence confidentially from those individuals (to enable covert investigations).
- l) Introduce a system of super-complaints to capture national or cross-force issues that are not otherwise captured by the existing complaints system, IPCC investigations or HMIC inspections.

Appendix B - Triage Pilot for low level concerns - Terms of Reference **(Version 5.0)**

Background

The Policing and Crime Bill is due to receive Royal Assent in the spring of 2017. It is formed of nine parts. Part two will make provision about the handling of Police Complaints, Discipline and Inspection. The Bill will give Police and Crime Commissioners new powers to bring the management of low level complaints into their offices, should they choose to, OR to have a stronger role in overseeing them. Changes will for the first time co-ordinate and professionalise the management of low level dissatisfaction with police forces.

In preparation for the above, Essex Police and the Office of the Police and Crime Commissioner have agreed to scope a triage pilot for low level complaints which will be evaluated after a period of three months.

Definition of complaint

The Bill changes the current definition of a complaint from being a 'complaint about the conduct of a person serving with the police.' It is now broadly defined as '*any expression of dissatisfaction with the police force,*' and it could include customer service or policing policy.

Aims

The ethos behind this pilot is to develop a new customer facing triage model to manage low level concerns and dissatisfaction from members of the public concerning Essex Police (EP). The model should have the ability to tackle and resolve these in a proportionate, efficient and effective way. The team will focus on delivering the best possible service that promotes satisfaction and confidence; and our standards and commitments within the Code of Ethics and the Police and Crime Plan. The pilot will apply the principles of good complaint handling by;

1. Getting it right
2. Being customer focused
3. Being open and accountable
4. Acting fairly and proportionately
5. Putting things right
6. Seeking continuous improvement

Authority

Essex Police will retain its authority to manage and resolve all incidences of low level dissatisfaction with the force. The triage team will centralise and professionalise the management of these, testing the concept to inform the decision making of the force and OPCC.

The team will work closely with the Professional Standards Department (PSD) and report directly to the Quality of Service Group.

Proposed Model

The core responsibility for the Quality of Service Team, based at Headquarters, is to act as a central co-ordination point for all victims and witnesses who have enquiries about their contact with Essex Police. Their aim is to own and resolve effectively all low level dissatisfaction with the force, or

escalate these to PSD if necessary. Any learning from the public is shared with the Quality of Service Group to help shape future service.

For the purposes of the pilot, a low level concern will be defined as any expression of dissatisfaction by a member of the public about the quality of service they have received from the force and which they accept informal resolution as satisfactory service recovery.

It is proposed that a triage pilot be based within this team, testing a model for a period of three months. The role of the triage falls within the period prior to the statutory timeline within which a complaint must be recorded (10 days). Their focus will be on resolving low level concerns at the earliest opportunity and within 72 working hours, adopting the following approach;

- Aim to resolve low level concerns/dissatisfaction with service informally 'there and then' to the satisfaction of the complainant.
- Where direct contact has not been made with the team, initial contact will be made with the complainant within 24 working hours, preferably over the phone. This should be used to explain the role and remit of the triage team, include early management of expectations and inform the complainant when they will be next contacted. Initial contact should also record as many of the background details to the concern as possible.
- Aim to resolve a concern/dissatisfaction within 48 working hours of receipt where possible or within 72 working hours if there are difficulties contacting the officer involved.
- Those issues that the team are unable to resolve, 'there and then' should involve engagement with or referring to the OIC or supervisor or escalation as appropriate.
- Accurate record keeping of workflow and actions taken from the outset so that another team member can access details of the concern if necessary.
- Ensure there is a fast track to PSD for referrals to ensure no delays in concerns which do require local resolution or investigation.
- The Quality of Service Manager will ensure that repeat Officers and Police Staff are brought to the attention of their supervisors for them to consider any action plans/UPP.

Resource

The Quality of Service Team establishment is 5.0 police staff full time and 1.0 full time manager resource who also takes line responsibility of front counter staff across the county. Working hours of the team are Monday to Saturday between 9.30am and 5.30pm.

Initial baseline data monitoring for the period April to June 2016 shows 128 dissatisfactions logged which required escalation to either the investigating officer's supervisor or referral to PSD if appropriate. This volume does not reflect the total volume of calls for service referred to the team, only the volume which they themselves were not able to resolve satisfactorily 'there and then'.

From 1st January to 31st December 2015, PSD received 1103 'IX' issues (matters outside of the complaint process) which were allocated to the local force commands for resolution.

From 1st January to 30th June 2016 there were 1126 incidents of dissatisfaction recorded on STORM

It is proposed that the Quality of Service team will work closely with PSD and receive any relevant training to ensure effective, fair and proportionate decision making.

Joint discussions around the set-up of the triage pilot will need to consider the capability of this resource weighted against demand, the total of which is not fully understood.

Proposed Benefits

The successful triage of low level concerns and dissatisfaction could potentially have significant benefits for PSD, Local Policing Teams (LPT) and other Commands as it would help to resolve the volumes of complaints before they reach them. A well trained team will afford a higher level of service to the public, reduce the number of interventions per concern and need to escalate any further. By utilising non-police staff, the pilot could also have a positive impact on PSD resources enabling them to deploy their skilled resource to manage the more serious element of complaints around officer conduct.

Record keeping will be more effective, giving the triage team a clearer insight with the ability to link concerns and remove any duplication of effort and unnecessary waste of police resource. The team could support the signposting, as appropriate, of the public to other services e.g. joint services available within Community Policing Hubs.

The pilot aims to tackle and resolve low levels concerns in a proportionate, efficient and effective way. Delivering the best possible standards will help improve victim satisfaction and public confidence. Analysis of these concerns should also improve understanding of what concerns local people have and can potentially inform future priorities for the Police and Crime Plan. This may also identify areas of good practice that could be shared across the force.

Evaluation

This will be measured by;

- Conducting regular audit of cases to ensure appropriate outcomes e.g. cases that should have been referred to PSD were in fact referred
- Producing weekly statistics to evidence the number of successful early interventions by the triage team
- Improvement in victim satisfaction and any impact on public confidence should be measured by carrying out a survey of complainants.
- Referencing to the future public contact programme and greater efficiency to ensure the public are better informed and updated in an effort to reduce the volume of low level satisfaction.
- Considering what best practice exists in other forces to inform and consider this alongside any recommendations in a future review.
- Any reduction in the IPCC quarterly stats of official complaints being generated in force.

Risks and Issues

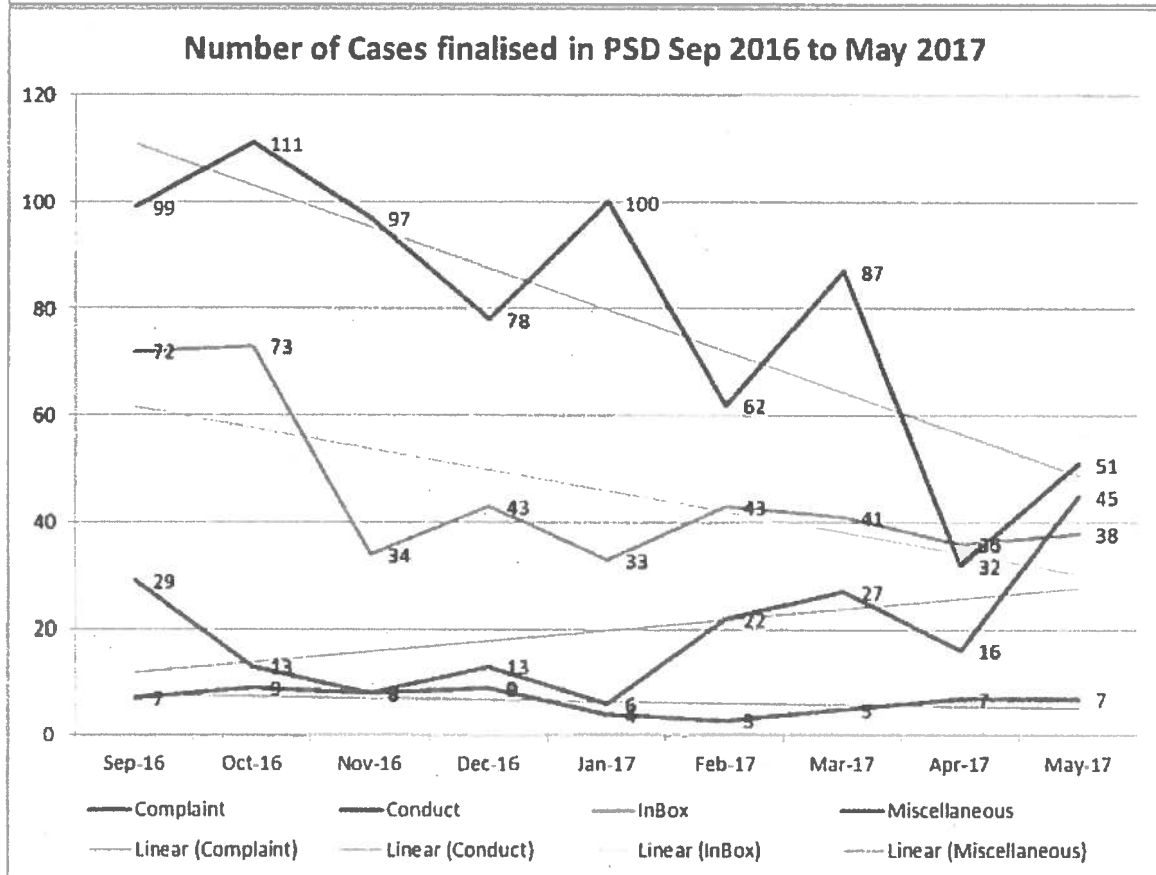
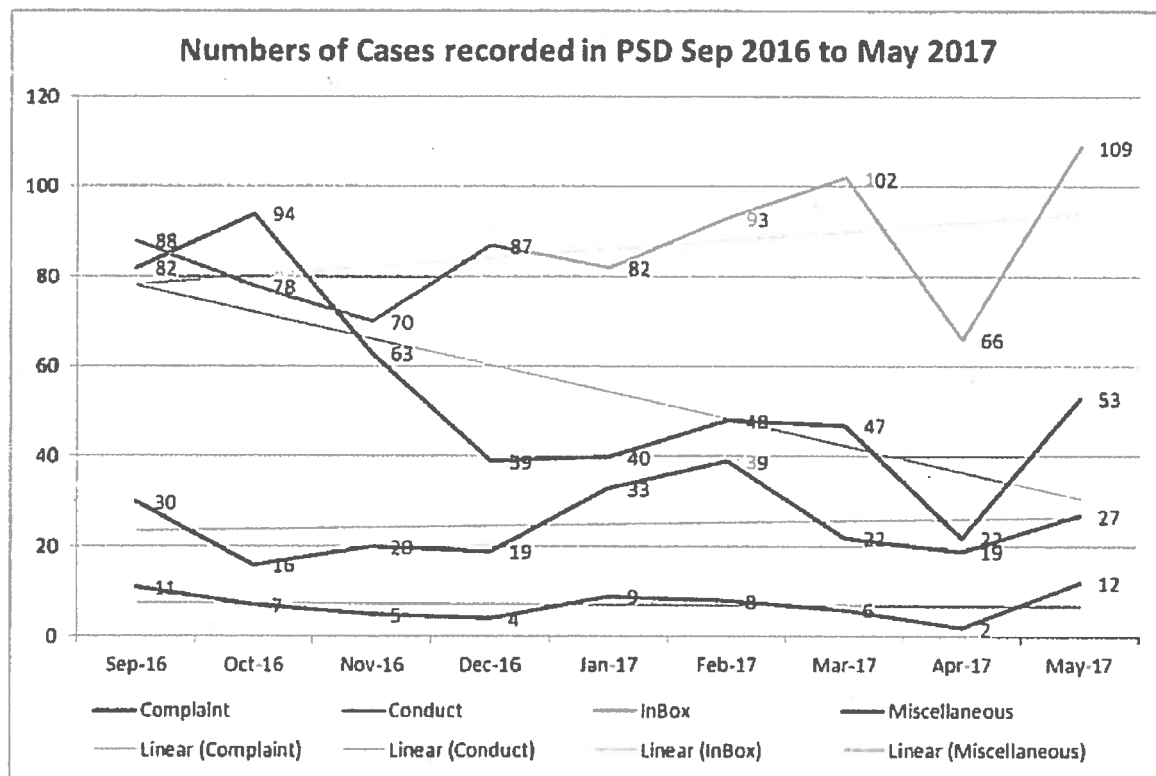
The main risk associated with the pilot is with the lack of current information about the existing and future volume of cases that may be handled / directed to the Quality of Service Team, once a single point of access and resolution is opened up to the public. Currently concerns for service are routed to many different areas across the Force with access across a variety of different entry points including switchboard, direct to officer, police station front office. Onward routing and resolution is

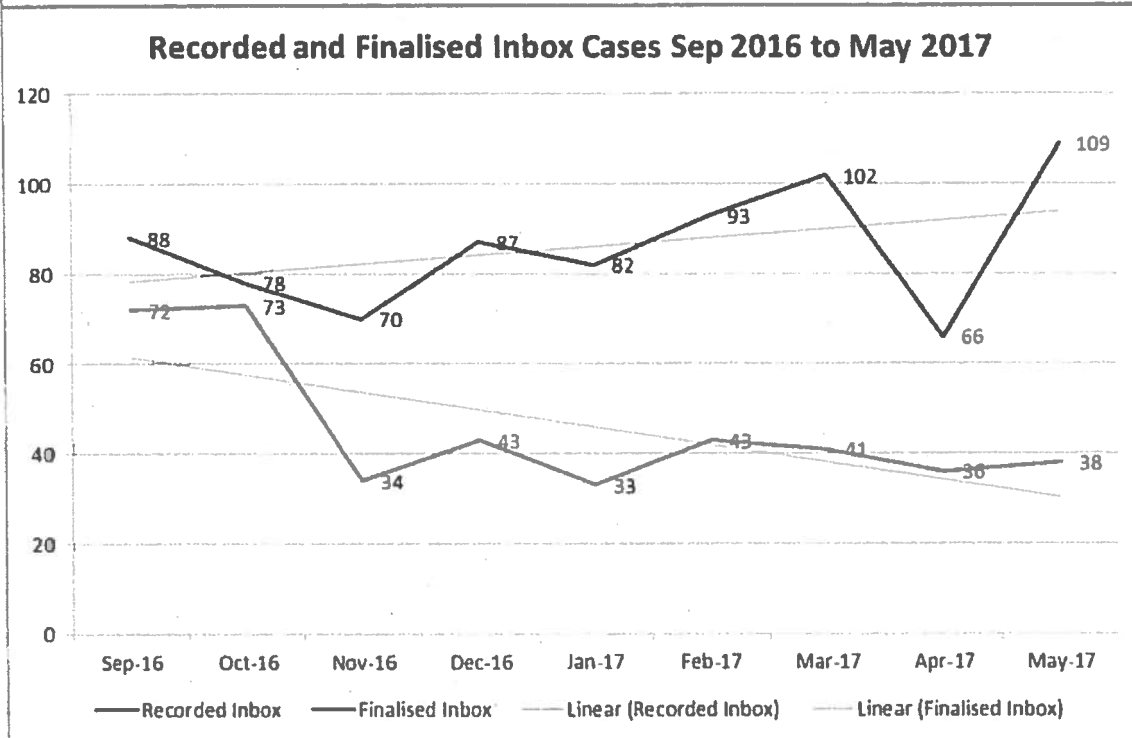
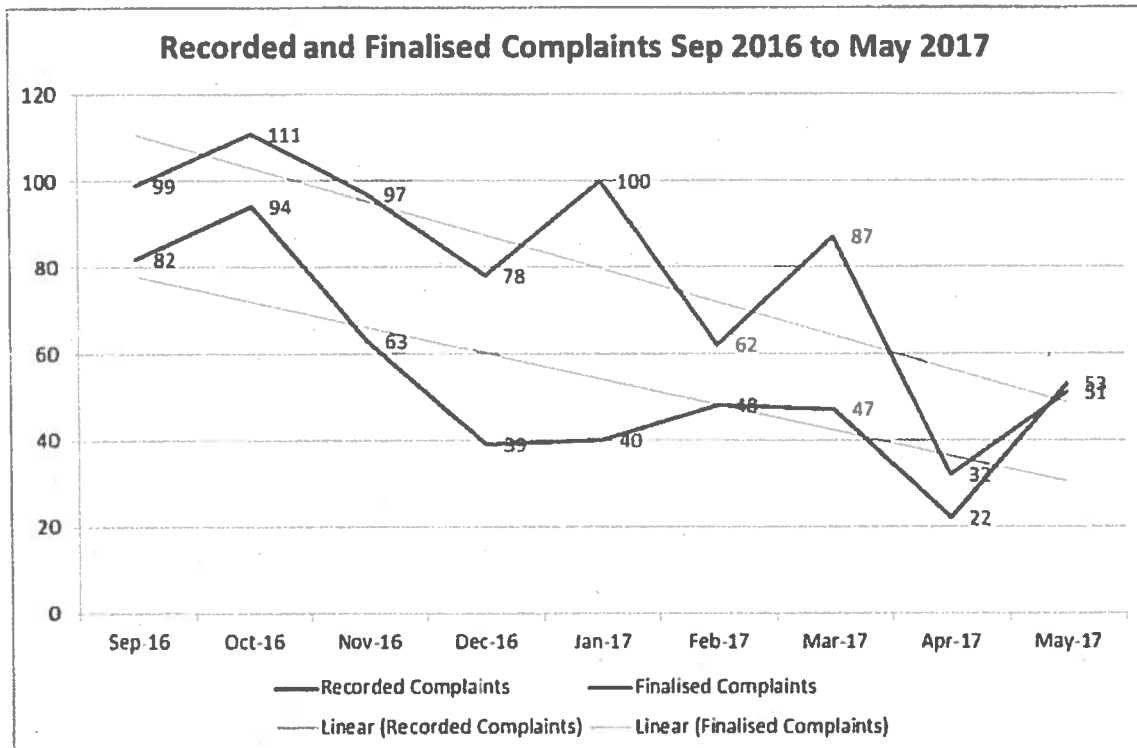
not captured across a single system making it difficult to forecast potential volumes, themes, resolution and ability to accurately match resources to workload.

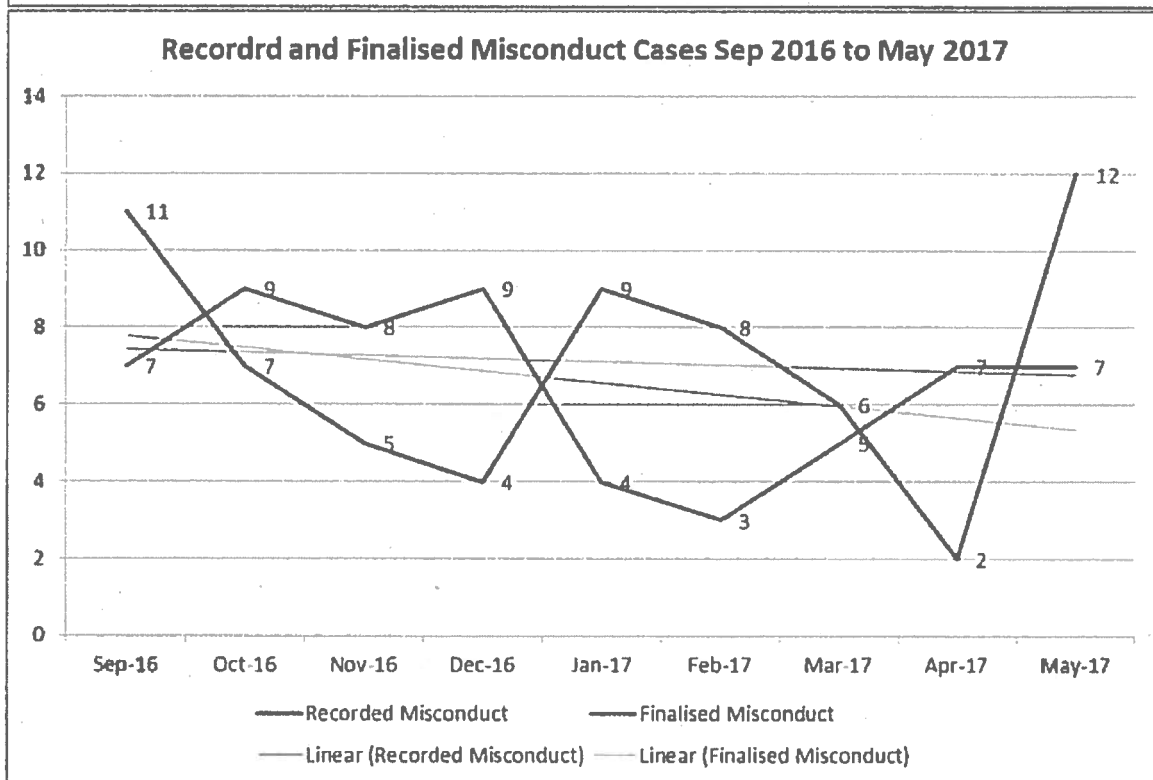
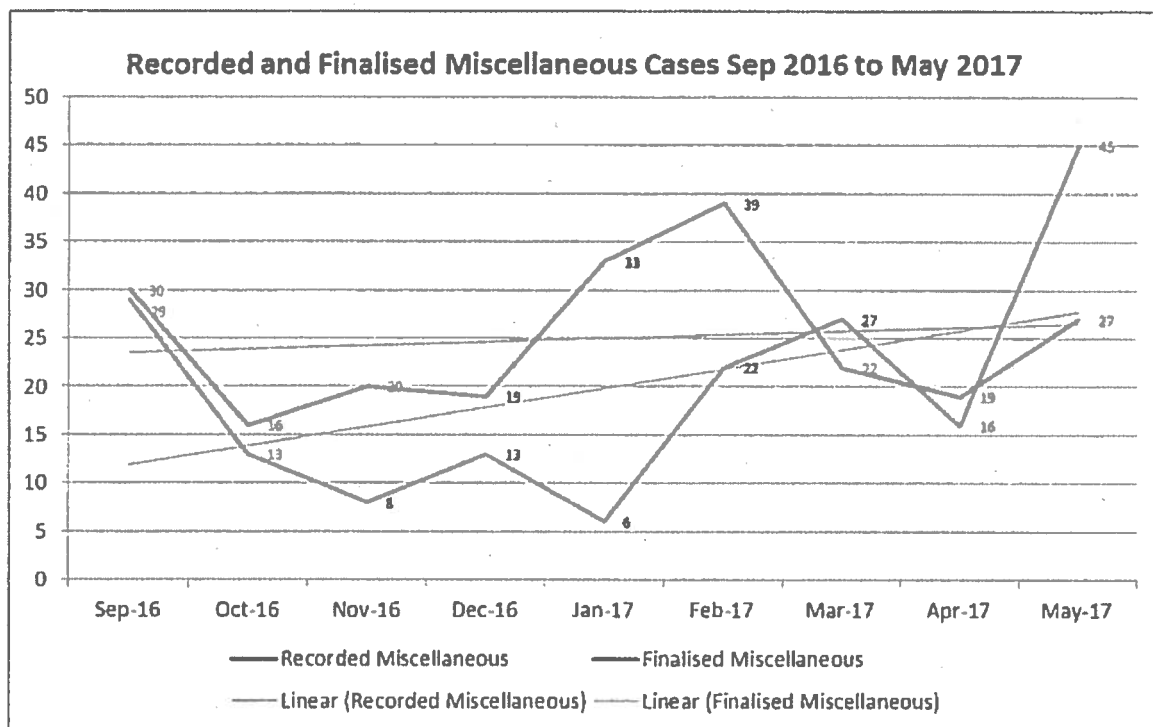
The pilot will be able to find out more about these unknowns and make recommendations for alternative models / service improvement.

All issues will be monitored on an implementation matrix.

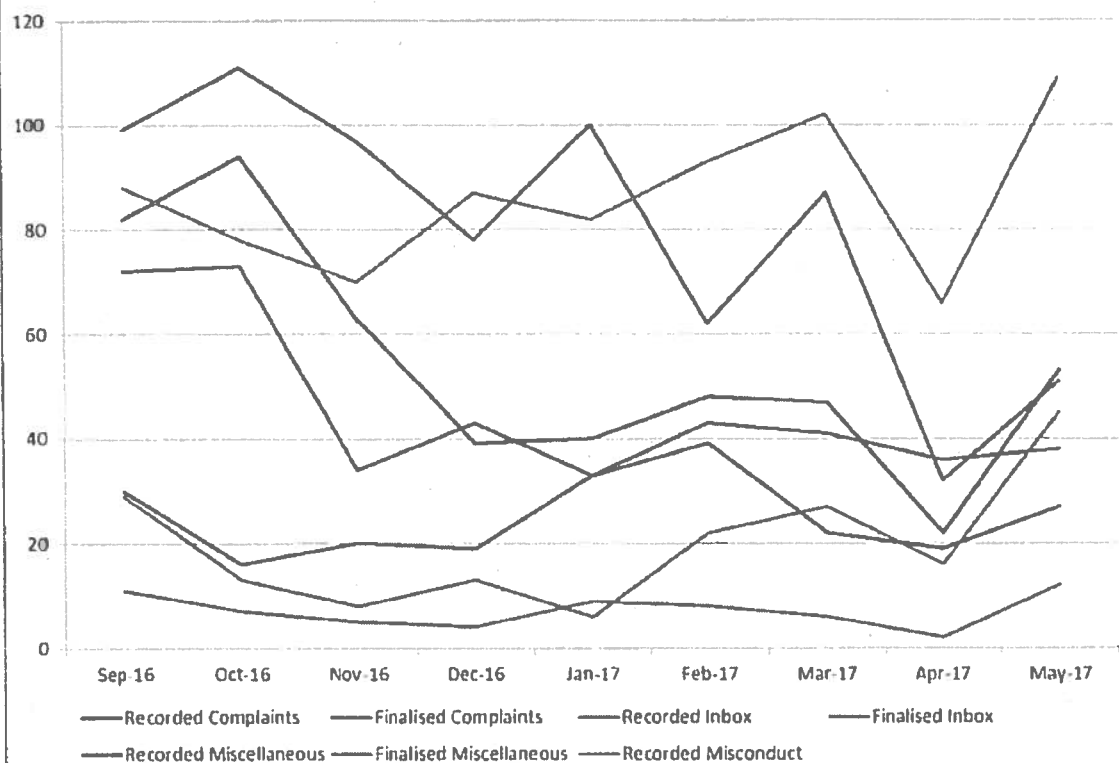
APPENDIX C – PSD data from Centurion referencing the recorded and finalised complaints







All Recorded and Finalised Cases Sep 2016 to May 2017



Appendix D

Quality of Service Team

Demand for Service, Resource Available and Results during the Pilot Period

	Jan-17	Feb-17	Mar-17	Apr-17
101 total demand into the Q of S team ¹	1256	1545	1512	1360
101 public calls answered by the Q of S team ²	1193	1483	1467	1322
Abandoned rate and average time waiting ³	47 calls at 0:02	50 calls at 0:02	27 calls at 0:01	28 calls at 0:03
Hours worked during month (resource average per month being 641 hrs) ⁴	546	554	509	515
Volume concerns/dissatisfaction escalated by Q of S team to officers and other business areas to support service recovery ⁵	540	491	395	329
Volume of dissatisfaction required to be recorded within Centurion	1	6	0	2
External online communication into the Q of S team email boxes	507	520	643	526
Victims details escalated into Q of S team by independent research company requiring service recovery	9	13	8	8

¹ First full month of data only available from Jan 17

² Data taken from Netcall

³ Data taken from Netcall

⁴ Data from ARC system

⁵ Recording of the team has been reviewed during the pilot period and changes made to the volume of contact recorded. Further changes are being made from 1st June 2017 to enhance this level of data

