

CBSL

**Police and Crime Commissioner for Wiltshire and Chief Constable of
Wiltshire Police**

Appraisal Review of the Complaints Management Arrangements

2015/16

FINAL

July 2015

Appraisal Review of the Complaints Management Arrangements

Executive Summary

<p>OVERALL ASSURANCE ASSESSMENT</p>  <p>The diagram shows a central orange circle labeled 'LIMITED ASSURANCE' surrounded by a blue ring with the text 'Adequate & effective governance, risk and control processes'. To the right is a legend with four levels: 'SUBSTANTIAL ASSURANCE' (light green), 'REASONABLE ASSURANCE' (yellow), 'LIMITED ASSURANCE' (orange), and 'NO ASSURANCE' (red).</p>	<p>KEY FINDINGS</p> <ul style="list-style-type: none"> • A corporate complaints policy / procedure is not in place. • The application used to record and manage complaints, Firstpoint, is not functioning correctly, which has a number of consequences including an inability to accurately report and monitor complaints. 								
<p>SCOPE</p> <p>The review appraises the arrangements for monitoring complaints received and ensuring that appropriate action is taken in a timely manner. The scope of the review does not include confirming that the matters leading to complaints received have been appropriately addressed.</p>	<p>ACTION POINTS</p> <table border="1"> <thead> <tr> <th>Urgent</th> <th>Important</th> <th>Routine</th> <th>Operational</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>1</td> <td>1</td> <td>1</td> </tr> </tbody> </table>	Urgent	Important	Routine	Operational	1	1	1	1
Urgent	Important	Routine	Operational						
1	1	1	1						

Management Action Plan - Priority 1, 2 and 3 Recommendations

Rec.	Risk Area	Finding	Recommendation	Priority	Management Comments	Implementation Timetable (dd/mm/yy)	Responsible Officer (Job Title)
1	Operational	The correspondence process map only reflects complaints received and managed by the Secretariat. There is currently no common complaints policy / procedure in place to guide staff in the process to be followed when a complaint is received in other parts of the organisation.	A common complaints policy / procedure be developed and communicated to divisions to ensure a consistent process for receipt and management of complaints throughout the Organisation.	1	<i>It has been agreed to hold complaints under Professional Standards rather than secretariat. It is planned to set up a link on the intranet which will hold FAQs and inform staff of the process to be followed.</i> <i>Knowledge of this to be cascaded to staff via Force e-briefs and within 'what's new this week' ticker tape on Firstpoint front page.</i>	To be completed by October 2015	Head of PSD

PRIORITY GRADINGS

1	URGENT	Fundamental control issue on which action should be taken immediately.
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2	IMPORTANT	Control issue on which action should be taken at the earliest opportunity.
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3	ROUTINE	Control issue on which action should be taken.
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Rec.	Risk Area	Finding	Recommendation	Priority	Management Comments	Implementation Timetable (dd/mm/yy)	Responsible Officer (Job Title)
3	Operational	The review identified that the application used to record and manage complaints, Firstpoint, was not functioning correctly which has a number of consequences in terms of the Secretariat's ability manage the complaints process, including accurate reporting and monitoring of complaints and day-to-day tracking of correspondence.	The issues with the functionality and performance Firstpoint systems be remedied at the earliest opportunity.	2	<i>The requirement to do this is understood and a new version of Sharepoint/Firstpoint is being implemented in June 2015. Once compliance is completed early autumn, improvements to the system will be implemented to ensure it meets the requirement.</i>	October 2015	Secretariat & Admin Team Leader in conjunction with IST Services

PRIORITY GRADINGS

1	URGENT	Fundamental control issue on which action should be taken immediately.
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2	IMPORTANT	Control issue on which action should be taken at the earliest opportunity.
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3	ROUTINE	Control issue on which action should be taken.
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Rec.	Risk Area	Finding	Recommendation	Priority	Management Comments	Implementation Timetable (dd/mm/yy)	Responsible Officer (Job Title)
2	Operational	Members of the public are able to raise a complaint through a variety of means including telephone, online through an enquiry web form, in person at Police Stations / Enquiry Offices and Police HQ, and in writing. However, although these means of contact are included on the Wiltshire Police website, other than the online web form, the information presented on the Complaints pages of the website does not explicitly state that these options are open to members of the public to raise complaints. Clearer signposting on the Complaints pages of the Wiltshire Police website of the means by which members of the public can raise complaints would make the process easier for members of the public and also potentially help ensure that the Secretariat (and Professional Standards Department) have better sight of complaints made by guiding members of the public to the preferred methods of correspondence	All the ways by which members of the public are able to make a complaint be signposted on the Complaints pages of the Wiltshire Police website.	3	<i>Agreed, it is planned for a link to be introduced on the Force website to signpost members of the public wishing to make a complaint.</i>	October 2015	Secretariat & Admin Team Leader in conjunction with Corporate Communications

PRIORITY GRADINGS

1	URGENT	Fundamental control issue on which action should be taken immediately.	2	IMPORTANT	Control issue on which action should be taken at the earliest opportunity.	3	ROUTINE	Control issue on which action should be taken.
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Operational Effectiveness Matters

Ref	Risk Area	Item	Management Comments
1	Operational	Consideration be given to allowing access to Firstpoint to selected individuals within Divisions to record and manage complaints received. This will help to ensure that complaints received are recorded and managed in a consistent manner, and also assist with trend monitoring.	<i>This will be considered as part of the review.</i>
2	Operational	Consideration be given to establishing a system of performance and monitoring of the complaints process once the issues with Firstpoint have been resolved.	<i>Depending on the system implemented, this will be considered following the review.</i>

ADVISORY NOTE

Operational Effectiveness Matters need to be considered as part of management review of procedures, rather than on a one-by-one basis

Detailed Findings

INTRODUCTION

1. This review was carried out in May 2015 as part of the planned internal audit work for 2014/15. Based on the work carried out an assessment of the overall compliance with the Organisation's arrangements to mitigate the key control risk areas is provided in the Executive Summary.

KEY FINDINGS & ACTION POINTS

2. The key control and operational practice findings that need to be addressed in order to strengthen the control environment are set out in the Management and Operational Effectiveness Action Plans. Recommendations for improvements should be assessed for their full impact before they are implemented.

SCOPE AND LIMITATIONS OF THE REVIEW

3. The review appraises the arrangements for monitoring complaints received and ensuring that appropriate action is taken in a timely manner. The scope of the review does not include confirming that the matters leading to complaints received have been appropriately addressed.
4. The definition of the type of review, the limitations and the responsibilities of management in regard to this review are set out in the Annual Plan.

MATERIALITY

5. Effective complaints management is essential for a number of reasons particularly within public services. The benefits include insight to providing quality services and achieving strategic objectives, correcting problems and generating or restoring goodwill.

DISCLAIMER

6. The matters raised in this report are only those that came to the attention of the auditor during the course of the internal audit review and are not necessarily a comprehensive statement of all the weaknesses that exist or all the improvements that might be made. This report has been prepared solely for management's use and must not be recited or referred to in whole or in part to third parties without our prior written consent. No responsibility to any third party is accepted as the report has not been prepared, and is not intended, for any other purpose. TIAA neither owes nor accepts any duty of care to any other party who may receive this report and specifically disclaims any liability for loss, damage or expense of whatsoever nature, which is caused by their reliance on our report.

RISK AREA ASSURANCE ASSESSMENTS

7. The review is limited to carrying out appraisal work on the practices adopted and therefore cannot be relied upon to provide assurance on the overall fitness for purpose of the controls over this process. The definitions of the appraisal assurance assessments are:

Substantial Assurance	Based upon our findings arising from a review which did not consider the internal control arrangements the expected practices and processes are in place.
Reasonable Assurance	Based upon our findings arising from a review which did not consider the internal control arrangements some of the expected practices and processes are in place, although improvements could be made to the arrangements.
Limited Assurance	Based upon our findings arising from a review which did not consider the internal control arrangements a small number of the expected practices and processes are in place. Significant improvements to the arrangements are required.
No Assurance	Based upon our findings arising from a review which did not consider the internal control arrangements there is a fundamental absence of the expected practices and processes are in place. Immediate action is required to improve the arrangements.

ACKNOWLEDGEMENT

8. We would like to thank staff for their co-operation and assistance during the course of our work.

RELEASE OF REPORT

9. The table (Figure 1) below sets out the history of this report.

Figure 1 - Report History

Date draft report issued:	5 th June 2015
Date management responses recd:	29 th June 2015
Date final report issued:	2 nd July 2015

10. The following matters were identified in reviewing the Key Risk Control Objective:
- 10.1 Wiltshire Police differentiate between complaints which are made about the conduct of a person serving with the police and procedural complaints.
 - 10.2 Complaints about the conduct of a person serving with the police can be made by a member of the public who claims to be the person in relation to whom the conduct took place or adversely affected by it or witnessed it or someone acting on that person's behalf. These types of complaint are passed directly to the Wiltshire Police Professional Standards Department who investigate the complaint and manage all administrative tasks involved.
 - 10.3 A procedural complaint is one about the manner of policing and action taken rather than the conduct of an individual. Procedural complaints are received and administered by the Secretariat to the Chief Constable.
 - 10.4 This review focuses on procedural complaints and the processes in place within the Secretariat within the Chief Constable for receiving and administering correspondence.

Operational Risk: Failure to identify opportunities to operate more efficiently or to be prepared for forthcoming changes.

Policy and Procedures

- 10.5 A correspondence process map has been developed which describes the process of receiving and actioning correspondence, including complaints, received by the Secretariat. This was updated in May 2015.
- 10.6 The correspondence process map only reflects complaints received and managed by the Secretariat. There is currently no common complaints policy / procedure in place to guide staff in the process to be followed when a complaint is received in other parts of the Organisation.

Recommendation: 1

Priority: 1

A common complaints policy / procedure be developed and communicated to divisions to ensure a consistent process for receipt and management of complaints throughout the Organisation.

- 10.7 Only the Secretariat use Firstpoint to record complaints received.

10.8

Operational Effectiveness Matter: 1

Consideration be given to allowing access to Firstpoint to selected individuals within Divisions to record and manage complaints received. This will help to ensure that complaints received are recorded and managed in a consistent manner, and also assist with trend monitoring.

Communication of the Complaints Procedure

10.9 Members of the public are able to raise a complaint through a variety of means including telephone, online through an enquiry web form, in person at Police Stations / Enquiry Offices and Police HQ, and in writing. However, although these means of contact are included on the Wiltshire Police website, other than the online web form, the information presented on the Complaints pages of the website does not explicitly state that these options are open to members of the public to raise complaints. Clearer signposting on the Complaints pages of the Wiltshire Police website of the means by which members of the public can raise complaints would make the process easier for members of the public and also potentially help ensure that the Secretariat (and Professional Standards Department) have better sight of complaints made by guiding members of the public to the preferred methods of correspondence

Recommendation: 2**Priority: 3**

All the ways by which members of the public are able to make a complaint be signposted on the Complaints pages of the Wiltshire Police website.

Complaints Process

- 10.10 The Secretariat Team Leader stated that very few complaints are made in person at Police HQ in Devizes, however, where required, arrangements would be made to ensure that the member of the public would be able to raise the complaint confidentially.
- 10.11 The nature of the correspondence is recorded on Firstpoint under the following classifications: complaints; general; thanks; information/intelligence; invitation; cold caller; and, not for police.

- 10.12 Upon receipt of correspondence, the secretariat aim to have replied with an acknowledgement with three to five working days and each complaint received has a target date for completion set at 28 days following receipt of the correspondence. The Secretariat aim to undertake 'chases' at 21 days and 27 days.
- 10.13 A review was undertaken of a sample of complaints received, it was found that although receipt of the complaint was recorded accurately and acknowledgement letters sent within timescales, chase actions were inconsistent and four cases older than 28 days were not marked as closed (details have been provided to the Secretariat Team Leader for review. Discussion with the Secretariat Team Leader noted that the ability to chase has been restricted due to the issues with Firstpoint and also staff absence (See Recommendation 3).
- 10.14 The Secretariat Team record correspondence received on a *Microsoft Sharepoint* application, called 'Firstpoint' by Wiltshire Police. The system is used to: record correspondence dates, including date correspondence received, acknowledged and completed; to record details of the contact including nature of the correspondence and source; to note the officer tasked with responsibility for reviewing and responding to the query; and, to track the status of the response.
- 10.15 The Secretariat Team Leader stated that there have been problems with the functionality and reliability of Firstpoint for approximately eighteen months caused by the number of records held making the system unstable. This has a number of consequences which include, for example, an inability to effectively search the database whereby searches may not return all relevant records and correspondence in letters files saved to the system not always showing all records held. The system should also be able to allocate tasks and issue 'chase' reminders automatically but does not have the functionality at present.
- 10.16 The Secretariat Team Leader stated that this has number of consequences in terms of the management control over the system, for example, given that searches may not show all the cases included on the system, it results in an inability to accurately track the status of items and review those that remain open without action being taken. At the time of the audit, the system was showing a number of historic items as 'open' which may actually have been closed.
- 10.17 Although the issues have been raised with the relevant Information Technology (IT) staff, resolution has been prioritised against wider Transformation requirements within the Organisation. In context, although issues there have been issues with Firstpoint functionality and the Secretariat's ability to administer complaints, the Secretariat Team Leader stated that to their knowledge, there have only been two occasions when a member of the public has had recourse to contact the Organisation to follow up their query due to lack of appropriate response.
- 10.18 The review identified that the application used to record and manage complaints, Firstpoint, was not functioning correctly which has a number of consequences in terms of the Secretariat's ability manage the complaints process, including accurate reporting and monitoring of complaints and day-to-day tracking of correspondence.

Recommendation: 3**Priority: 2**

The issues with the functionality and performance Firstpoint systems be remedied at the earliest opportunity.

Trend Monitoring and Use of Data

- 10.19 There are no formal data reporting / key performance indicator requirements that relate to the complaints process. The Secretariat Team Leader noted that given the current problems of reliability and accuracy of reporting of the Firstpoint system, any data collation and related reporting would not be meaningful. The ability to monitor the performance of the complaints process, for example, complaints resolved within a set period and trend monitoring of the types of complaint received, would enhance the service provided to the public and help the Secretariat to manage the process and target resources effectively.

Operational Effectiveness Matter: 2

Consideration be given to establishing a system of performance and monitoring of the complaints process once the issues with Firstpoint have been resolved.
