



House of Commons
Home Affairs Committee

**Police conduct
and complaints:
Government Response
to the Committee's
Sixth Report**

**Fourth Special Report of Session
2021–22**

*Ordered by the House of Commons
to be printed 27 April 2022*

Home Affairs Committee

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The current staff of the Committee are Elektra Garvie-Adams (Second Clerk), Kate Johal (Committee Specialist), Jennifer McCormick (Committee Operations Officer), Niamh McEvoy (Committee Specialist), Penny McLean (Committee Specialist), George Perry (Senior Media and Communications Officer), Paul Simpkin (Committee Operations Manager), David Weir (Clerk), Stephanie Woodrow (Committee Specialist).

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Fourth Special Report

The Home Affairs Committee published its Sixth Report of Session 2021–22, [Police conduct and complaints](#) (HC 140), on 1 March 2022. The Government's response was received on 13 April 2022 and is appended to this report.

In the Government response the Committee's recommendations are shown in **bold italic** type; the Government's response is shown in plain type.

Appendix: Government Response

Introduction

This is the Government's response to the Home Affairs Committee report, 'Police Conducts and Complaints' published 1 March 2022. The report made a total of 13 recommendations, including the following:

- That the Government review how IOPC; HIMCFRS and Coroner's learning recommendations to police forces and others are reported to the public in a joined-up way, co-ordinated and published centrally.
- That the Government review bi-annually how well PCCs are holding their forces to account for implementing them.
- That the Government appoint an independent chair alongside the director general of the IOPC as a matter of urgency.
- That the Government make an early assessment of PCC involvement in police complaints system.

Overview

The Government notes the Committee's positive comments on the February 2020 reforms to the police conduct and complaints system, and is pleased that the Committee welcomes the reforms that "ensure the delays to investigations are minimised", and that they "welcome the super-complaints process" and are 'encouraged by the Home Office's pledge' to review the designated bodies to include a broader range of organisations. It is also positive that the Committee recognises the "significant strides" made by the IOPC since 2018.

The Government also notes the Committee's concerns that, based on some of the evidence it has seen and heard, the work of "providing—and demonstrably providing—a fair, open and, above all, fully trusted mechanism to deal with misconduct remains, as yet unfinished". The Government agrees that improving the police complaints and discipline systems is an ongoing process and notes the findings on recent high-profile police conduct cases. The Home Secretary has recently set up the Angiolini Inquiry into matters arising from the murder of Sarah Everard and it is intended that this will look at the wider cultural issues affecting policing as part two of that inquiry.

The Government is also grateful to the Committee for their consideration of the police complaints and discipline systems. Our responses to the recommendations and suggestions aimed at central Government, its arms' length bodies, such as the Independent Office for Police Conduct (IOPC), and policing partners are set out below. For ease, these have been numbered in line with the Conclusions and Recommendations section of the Committee's report itself (from page 46 onwards).

Structure and operation of the police complaints process

Recommendation 1 (paragraph 6, page 47)

It has been argued that uniting the roles of chair and director general of the IOPC aids clearer decision-making and action. We disagree. This is not normal practice and it detracts from the ability properly to scrutinise the executive action of the IOPC and to hold it to proper account. We recommend that the Government appoint an independent chair alongside the director general of the IOPC as a matter of urgency to restore the usual checks and balances. (Paragraph 54)

Government Response

The Independent Office for Police Conduct (IOPC) was launched following reforms to the Independent Police Complaints Commission (IPCC) in 2018. The decision to combine the role of the Director General (DG) and Chair of the unitary board of the reformed organisation reflected the recommendation in the independent governance review conducted by Sheila Drew Smith in 2015¹. The aim of having a single role was to demonstrate the independence of decision-making to enhance public and police confidence, and to maintain a single line of decision making. This was the role to which Michael Lockwood was appointed in January 2018. Scrutiny of and support for the DG is provided by the unitary board, on which, the non-executive directors must be in a majority and there is a senior independent non-executive director.

The Home Secretary announced last year that she was bringing forward the first periodic review of the IOPC. Such reviews of the Government's arms' length bodies typically consider the effectiveness of an organisation and its fitness for purpose. We agree that the existing governance structure, including this specific recommendation from the Committee, should be looked at as part of this review. We expect this to start early in 2022/23.

Recommendation 2 (paragraph 7, page 47)

We urge the Government to consider police complaints as part of the review of the PCC model currently under way and to make an early assessment of PCC involvement in the police complaints system. (Paragraph 62)

Government Response

The Government's review of the PCC model has looked a wide range of issues including public confidence and how PCCs are held to account themselves. The PCCs' review (Parts

1 Drew Smith, S. (2015) [An independent review of the governance arrangements of the Independent Police Complaints Commission.](#)

1 and 2) had clear terms and reference and concluded their work before the Committee published this report on police conduct and complaints. The Home Secretary announced the findings of Part 2 (via a Written Ministerial Statement) on 16 March 2022. So, we cannot now agree to the Committee's recommendation.

However, the Government will in due course, make an assessment of the impact of the reforms to police complaints implemented in February 2020. This will include consideration of the enhanced role for PCCs that the complaints reforms provided for.

Recommendation 3 (paragraph 10, page 47)

We urge the Government to fund PCCs adequately to take on Models 2 or 3 as a minimum requirement in their complaint-handling roles. This will provide PCCs the opportunity to work more closely with their forces, for example, to record and systematically monitor the root causes of complaints and recurrent issues that affect their communities disproportionately and how their forces resolve those issues. This depth and consistency of monitoring is required to achieve a national understanding of where fault lines exist in the complaints systems of the 43 police forces of England and Wales so that long-standing issues may be tackled. (Paragraph 64)

Government Response

The Government has demonstrated its commitment to supporting the police and policing bodies, including PCCs, and providing them with the resources they need to fight crime and keep the public safe. That is why for 2022/23, the Government has published a total police funding settlement of up to £16.9 billion; an increase of up to £1.1 billion when compared to 2021/22.

Assuming full take up of precept flexibility, overall police funding available to PCCs will increase by up to £796 million (5.8% in cash terms) next year. This includes an additional £550 million, including funding to deliver the final 8,000 additional officers and up to an additional £246 million from the proposed council tax precept flexibility.

PCCs and Mayors with PCC functions have a vital role in ensuring public confidence in local policing in their areas. Ensuring a robust complaints system is clearly key to ensuring public confidence. Whilst the funding settlement is decided centrally, it is for these directly elected local policing bodies in conjunction with their Chief Constables to make the operational decisions on how to allocate their resources based on local knowledge, local priorities and experience. We do not intend to prescribe how specific funding allocations should be spent or how local decisions should be taken. Anecdotal evidence suggests that, in deciding which model to originally adopt, factors such as supportive communications, election timings and resources will have influenced PCCs' thinking. The APCC have facilitated events with PCCs since the May 2021 PCC elections to explore whether there are further areas where PCCs might wish to expand on their complaint functions. The APCC further notes that these events have included input from the IOPC and the College of Policing to review the recurring and developing themes which are arising, and both the College of Policing and IOPC have committed to looking in detail at the systemic issues.

The fact that several PCCs have already adopted models 2 and 3 since the reforms were implemented in February 2020 would indicate that PCCs do have the capacity within their existing budgets to exercise these choices.

Police forces and the discipline system

Recommendation 4 (paragraph 12, page 48)

The police complaints system needs to be simpler and more transparent. We welcome IOPC statutory guidance which encourages forces to use accessible language and formats to explain the system, but it is not evident that all forces are yet doing this. All key stakeholders in the policing sphere (IOPC, NPCC, forces, CoP and the CPS) should be required to publish plain language versions of the systems, available in different languages and accessible formats. These should be made available online and in print. (Paragraph 81)

Government Response

The Government agrees that there is a need to ensure the police complaints system, and those bodies that interact with it, are transparent and accessible and that efforts are made to produce plain language and translated versions. The IOPC, the police, the College of Policing and the Crown Prosecution Service take their decisions and operate independently of the Government, and we are not minded to prescribe formats and requirements in law at this stage over and above the existing legislative framework on equality and language. The Home Office has been working with key stakeholders to obtain a better understanding of what work is already underway to meet these standards and will keep this recommendation under review.

For example, the Government, like the Committee, welcomes the work the IOPC have done to encourage forces to use accessible language and formats. The IOPC has translated general information published on their website into the 10 most regularly requested languages, in addition to English and Welsh. They also provide information in Easy Read, Braille, audio and large print formats, and on a British Sign Language DVD, and have produced a Young Person's Guide to the police complaints system in conjunction with their Youth Panel. Further work will be conducted to explore the potential for broadening accessibility through digital channels. The IOPC intends to revise their website this year, to include additional accessible content.

At current, the College of Policing are keen to assist with ensuring the police complaints system is clear and accessible for all and have provided a link to the IOPC website from their own, where clear guidance in everyday, accessible formats are provided.

The CPS Complaints Handling Standard already sets out an obligation for them to provide a service which complies with the principles of effective complaints handling. Their published Feedback and Complaints Policy is written clearly and in language which is easy to understand. The Policy is available on their website in both Welsh and English and can be provided in alternative formats where necessary.

As a collaboration body, which brings police forces in the UK together to help policing coordinate operations, reform, improve and provide value for money, the NPCC has a

less public facing role than statutory independent bodies such as the IOPC and the CPS. The NPCC has a user-friendly website with signposts on how to get further information. Additionally, the NPCC Complaints and Misconduct portfolio is currently working with the NPCC Single Online project team in development of an easily accessible and understood public complaint's portal that is consistent across the 43 police forces of England and Wales.

Recommendation 5 (paragraph 13, page 48)

More than six months on from its publication, the Home Office has not yet responded to our report on Macpherson and has given no indication of when it will respond. We urge the Home Secretary to respond to that Report. (Paragraph 92)

Government Response

The 1999 Macpherson Report left an indelible mark on policing following the terrible murder of Stephen Lawrence. Over the past two decades, since the report's publication, significant progress has been made to address Sir William Macpherson's findings. The way the police approach racist crimes has also changed beyond recognition since the murder of Stephen Lawrence in 1993.

Over the past few years, this Government has built on that progress. Police accountability has been strengthened with reforms introduced to the police discipline and complaints systems in 2020. Significant improvements have been made to Home Office data collections to enable greater scrutiny of police activity by ethnic group. Most significantly, the Government has made attracting more officers from a wide range of ethnic and socio-economic backgrounds a core ambition of its drive to recruit an extra 20,000 officers. We also recognise that across England and Wales, police officers and staff work hard each day to deliver fairness in policing to support ethnic minority victims of crime, to tackle hate crime and ultimately keep our communities safe.

The Home Office welcomes the Home Affairs Committee's inquiry and subsequent report, 'The MacPherson Report: twenty-two years on'. The recent events in policing continue to highlight how essential the issues raised in the report are.

The independent Commission on Race and Ethnic Disparities (CRED) report last year made a number of recommendations in relation to crime and policing, including improving trust and confidence by strengthening the systems of scrutiny, accountability and transparency. Both reports made recommendations on the same issues, including recruitment and the use of police powers.

The Home Office wishes to respond to the Home Affairs Committee with a full and detailed account, including a series of measures that translate into concrete action. In doing so, we allowed for the Inclusive Britain Action Plan to be published on the 17 March 2022 so that we could outline and build upon the action in this space as part of our response.

We are regretful that this has meant our response to the Home Affairs Committee has taken longer than we would normally expect.

The Home Office remains dedicated to doing everything in its power to build trust in policing across all communities. Any delay to our response to the Committee is not due to a lack of action in Government. The Home Office intends to respond to the Committee on The MacPherson Report: twenty-two years on, in May.

Recommendation 6 (paragraph 15, page 48)

PSDs should be properly resourced to ensure complaint and conduct matters are handled to a high standard and in a timely manner. We repeat the recommendations made in our Macpherson report to address urgently the disparity in BME staffing in PSDs. (Paragraph 97)

Government Response

The Home Office and the NPCC recognise the risk of a lack of appropriate representation within a number of PSDs and we must not be complacent. Whilst this is not an issue unique to PSDs, the role these departments play in instilling public and staff confidence, changing the culture and maintaining standards across forces means that it is crucial that they work to be truly representative of the workforce.

The Home Office will respond to the recommendations made in the Committee's Macpherson report and will outline the urgent actions the government, and policing partners, have and are taking on disparity in ethnic minority staffing in PSDs.

Recommendation 7 (paragraph 17, page 48)

The available statutory and regulatory frameworks must be used by forces and the IOPC to obtain fair, transparent and appropriate sanctions against officers. (Paragraph 98)

Government Response

The Government strengthened the complaints and discipline systems in February 2020, introducing integrity reforms to improve transparency, accountability and proportionality. The Government welcomes further improvements to the timeliness of, and cooperation within, police misconduct cases—during both the investigative and post-investigative stages.

These reforms included a new statutory duty of cooperation for police officers. This duty provides clarity on the level of cooperation required by an officer where they are a witness in an investigation, inquiry, or other formal proceedings. The responsibility is to participate openly and professionally as a witness in a variety of circumstances, including where the officer is a witness in an investigation into other officers' misconduct, be that an investigation by the IOPC or by the force itself. The Government is reluctant to dilute the existing measures in place to compel officers to cooperate. Nonetheless, the Home Office will continue to assess the impact of this existing duty on police co-operation with inquiries and investigations, and the Home Secretary will set out her conclusions on a specific duty of candour for the police later this year in response to the reports of Bishop James Jones on the experiences of Hillsborough families', and of the Daniel Morgan Independent Panel. We are also working closely with the College of Policing as part of

their review of the Code of Ethics, to ensure that candour is explicitly referenced. This work also includes how we can ensure that the Code has the necessary impact on officers and how it can provide confidence to the public in terms of officer behaviour.

The reforms also introduced a 12-month trigger to improve timeliness of misconduct and complaints and other investigations. This is a requirement for the investigating body—whether the Independent Office for Police Conduct (IOPC) or a police force's own Professional Standards Department (PSD)—to provide a written explanation for any delays, the planned steps to bring the investigation to a conclusion and the estimated completion date. Additional powers were also granted to the legally qualified chairs of misconduct hearings, allowing them to hold pre-hearings to improve case management. This means that issues including disclosure, witnesses or preliminary legal arguments can be dealt with in a much timelier manner. In addition, the reforms also stripped out some of the bureaucracy, so that now, for example, in cases where it has investigated or directed an investigation, the IOPC makes the decision to refer a case to disciplinary proceedings rather than making a recommendation to the force in the first instance. Under the new review process, the IOPC has scope to consider whether decisions made by police forces on locally investigated complaints cases were appropriate. The IOPC can use its powers to recommend disciplinary action is instituted or changed or to recommend referral to the CPS. The IOPC has pointed out that this review function adds value to the complaints system as a whole.

Since 2020, the Home Office has extended the scope of its data collection to include a range of timeliness measures, which will help target the root causes of delays in the processes beyond the length of an actual investigation. The first tranche of this data will be published as part of a standalone misconduct statistics publication in the coming months. The IOPC has also been working alongside the CPS to agree ways on improving post investigative timeliness.

The Government agrees that it is crucial that both officers are held accountable, where they are found to have committed misconduct. But it is important that sanctions *only* follow where an officer has been found to have committed misconduct or gross misconduct after a fair process of disciplinary proceedings. The Independent Office for Police Conduct (IOPC) plays a central role in investigating the most serious and sensitive allegations. Where it has investigated a matter, the IOPC must decide whether the officer has a case to answer for misconduct or gross misconduct and, if so, whether to refer the matter to disciplinary proceedings. The Government introduced new powers in 2020, so that the IOPC can also now present at a misconduct hearing, where it has investigated a case or where the force has undertaken an investigation directed by the IOPC in certain circumstances, including where it is in the public interest or where there is disagreement with the force over the decision to refer a case to proceedings.

However, decisions on whether an officer has committed gross misconduct and, if so, what sanction to apply, are ones entirely for misconduct panels led by independent legally qualified chairs (not for the IOPC). Since 2020, panels also now have the option of reducing an officer in rank, where they are found to have committed gross misconduct. The reforms also gave greater powers to LQCs to hold pre-hearings, for more effective case management and enabling issues around disclosure, witnesses and legal arguments to be dealt with early-on. The College of Policing issues guidance to those chairing misconduct proceedings (*'Guidance on outcomes in police misconduct proceedings'*) to support decision-

making when assessing the seriousness of an officer's conduct. This guidance is currently under review and a new version will be published in the near future. This new iteration has been adapted to ensure the intent of the reformed police disciplinary system is delivered so that sub-optimal behaviour is dealt with through reflective practice, whilst appropriate sanctions are delivered where serious and gross misconduct is found. The latest guidance ensures that those chairing disciplinary proceedings are signposted to the seriousness of key threat areas such as of abuse of position for sexual purpose and breaches of the standards of professional behaviour relating to Violent Against Women and Girls. It is also important that there are provisions in place to ensure that officers who have retired or resigned can continue to be held accountable. That is why the Government introduced legislation in 2017, providing for disciplinary proceedings to be brought against former officers, in certain circumstances.

The Government agrees that transparency in the discipline system is key to maintaining public confidence. That is why there is a presumption that misconduct hearings are held in public. Whilst there are occasions where hearings will legitimately need to be held in private—or certain information withheld—in 2019/20, 87% of those chaired by legally qualified chairs were held in public. The Minister of State for Crime, Policing and Probation recently wrote to all Chief Constables and the President of the National Association of Legally Qualified (NALQC) highlighting the importance of transparency in the discipline system and urging them to be as open and transparent with their decision-making as possible.

The IOPC complaints system

Recommendation 8 (paragraph 20, page 49)

A culture needs to be created within police forces—established by and led from the top—that requires rapid, open and non-defensive response to complaints about conduct, both to deal with misconduct where it arises and to clear the names and reputations of officers who have not transgressed. (Paragraph 116).

Government Response

The Government agrees that further work needs to be done to encourage cultural change within policing. The Home Secretary has already established the independent Angiolini Inquiry. Part two of that inquiry is expected to focus on policing culture more broadly. The Home Secretary has also tasked the police inspectorate with examining issues of conduct and culture in policing. A cultural change in policing is supported by the wider sector—including staff associations. This includes the introduction of Reflective Practice in the 2020 integrity reforms, which encourages the movement away from a 'blame culture' within policing and enables wider focus on learning and reflection under local line management support.

The Home Office is due to release its new experimental police misconduct statistics in May. The new statistics will offer the Home Office an opportunity to analyse the emphasis forces are putting on learning and reflection following the complaints and disciplinary reforms introduced in February 2020. They will also provide a more comprehensive look at the data on the end-to-end timeliness within the disciplinary system, an analysis which

would be welcomed by the IOPC. The statistics will provide a tangible base to help push culture change in policing where needed. The Home Office acknowledges that, to succeed, this must be driven by senior leaders and staff associations.

These statistics will include data on the use of reflective practice, and other learning outcomes by forces, since it was introduced in February 2020. Reflective practice supports a culture change in policing, moving away from a punitive process of handling complaints and conduct allegations, towards one where allegations which do not amount to serious misconduct are dealt with quickly and effectively by line managers. The process ensures that officers are truly reflective of their actions and ensures that there is an appropriate plan in place for them to learn and improve. This requires openness on the officer's part and provides a more appropriate response to members of the public who have raised complaints with the police.

The College of Policing is currently reviewing the Code of Ethics. The review work will produce a Code of Practice which will require Chief Officers to promote a culture of openness and accountability and to tackle individual and organisational defensiveness. It will require Chiefs to support and embed ethical decision making and encourage those working in policing to display the expected level of professional behaviour. The Code of Practice will also set out expectations of forces to have the skills and capacity to carry out effective and timely investigations, and to learn from mistakes.

The Code of Ethics review will also support those working in policing to understand what professional behaviour looks like and the expectations placed upon them. This will be through developing a clear set of policing principles to provide a strong and ethical framework for professional decision making and guidance on professional behaviour.

We expect to take forward further work in relation to police standards and culture following the conclusion of the Angiolini Inquiry.

Recommendation 9 (paragraph 21, page 49)

The IOPC must use its powers effectively to minimise delays to investigations at an early stage of the process. It should proactively call to account those responsible for delays or who refuse to co-operate with investigations. Police forces, individual officers and their representative organisations must also take more responsibility for rooting out bad behaviour and lifting the cloud of complaint against officers who have done their exceptionally difficult job properly. (Paragraph 117)

Government Response

The Government notes that the IOPC has made good progress in minimising delays to investigations but agrees that there is more that the IOPC can do to ensure their powers are used most effectively. The IOPC has already revised the guidance for police witnesses in their investigations, to make clear their expectations, how they will evidence non-cooperation and the consequences should officers continue not to cooperate.

The IOPC has expressed disappointment with the stance taken by the Police Federation, but looks forward to working with police forces and representative organisations to improve co-operation further with investigations carried out by the IOPC or PSDs. The IOPC further agrees that more work could be done in relation to the end-to-end system

timeliness and would welcome Home Office leadership on this issue. The Home Office, as noted in Recommendation 8, is due to publish experimental statistics on the police misconduct system in May, which will include initial analysis of end-to-end timeliness. The IOPC has further argued that it is not accurate for delays in CPS consideration, criminal proceedings or misconduct processes to be described as delays in investigation, which they often are. Unfortunately, these delays are damaging to confidence in the overall police accountability framework.

The Governments 2020 reforms to the police discipline and complaints system introduced a 'duty of cooperation' into the police Standards of Professional Behaviour, meaning it is now enshrined in law. Officers now have a statutory duty to cooperate with investigations, inquiries and formal proceedings when identified as a witness. Failure to cooperate is a breach of the standards and can be dealt with by police forces accordingly.

The Government agrees that forces, individuals, and their representative organisations must take further responsibility for rooting out bad behaviour. As outlined above, the College of Policing are undertaking a review of the Code of Ethics. The review will provide clear expectations that everyone in policing has a duty to challenge and report behaviour that undermines the profession and damages public confidence. And to be open, accountable and learn from mistakes at an organisational and individual level.

Lastly, as mentioned in recommendation 8, the Home Secretary has announced the Angiolini Inquiry, part 2 of which is expected to consider wider policing matters, which could include barriers to whistleblowing, vetting practices, professional standards and discipline and workplace behaviour.

Recommendation 10 (paragraph 25, page 49)

We urge the Home Office to highlight, on its super-complaints' website, that the 16 designated bodies should collaborate with non-designated bodies as appropriate to make a complaint on matters raised by non-designated bodies. Clarity of information is essential to ensure that the process is accessible to all groups and interests. (Paragraph 141)

Government Response

The Government will update the police super-complaints website on gov.uk to state that designated bodies should collaborate effectively with non-designated organisations and, where appropriate, make a complaint on the basis of the matters raised with it by a non-designated body.

Recommendation 11 (paragraph 27, page 49)

The IOPC has a statutory duty to uphold confidence in the police complaints system; and we urge the IOPC to embrace this role and to proactively communicate and defend the decisions it makes. (Paragraph 142)

Government Response

The IOPC are already making a concerted effort to uphold confidence in the police complaints system. As referred to in the Committee's report, this includes providing

greater transparency in the publication of investigation outcomes, actively listening to policing bodies and communities about their concerns, improved investigation timeliness and thematic reviews.

The current IOPC strategy (2018-2022) to improve confidence in police accountability laid out plans to engage with stakeholders and communities, to inform them of their right to complaint and to expect fair and just treatment in response to complaints and serious incidents. The IOPC has said that this stakeholder engagement has already had a significant impact on stakeholder perception. The new IOPC Strategy (Strategy 2) will have an even greater focus on increasing public confidence in the complaints system, and encouraging trust and confidence in policing, with a continued emphasis on stakeholder engagement.

Recommendation 12 (paragraph 29, page 50)

We recommend that the Government monitor and review bi-annually how effectively local policing bodies are holding their chief constables accountable for implementing IOPC recommendations to their forces, and report the outcomes to us. (Paragraph 151)

Government Response

Reforms implemented by the then Government in 2014 require any learning recommendations by the IOPC to forces to be published. Under the same legislation, forces are required to respond within 56 days and their responses must be published. IOPC publishes an annual impact report on improvements to policing flowing from its recommendations. The Government will consider, in conjunction with the IOPC, how it might be possible to go further in tracking progress by forces on implementing the IOPC's recommendations and reporting on this.

The role of Police and Crime Commissioners (PCCs) is to be the voice of the people and hold the police to account. PCCs have been elected by the public to hold Chief Constables and the force to account, effectively making the police answerable to the communities they serve.

The internal review into the role of PCCs has provided an opportunity to look more closely at how the Government can strengthen the accountability, transparency, resilience, legitimacy, and scrutiny of democratically elected PCCs. The Government has announced the recommendations via two written ministerial statements and is now working closely with policing, justice, and wider public safety partners to implement these.

Recommendations which will enable PCCs to hold their Chief Constables accountable include making the Chief Constable suspension and dismissal process (Section 38) more rigorous and transparent and consulting on potential changes to the Policing Protocol Order 2011 to clarify the roles and responsibilities of PCCs and Chief Constables.

The transparency of PCC performance and how they are driving force performance and holding the Chief Constable to account has also been improved by the recommendation from the Review to amend the Specified Information Order (SIO). The amended SIO, which came into force on 31 May 2021, places a duty on PCCs to publish certain information within specified timeframes, to ensure the public have the information they need to hold their PCC to account at the ballot box. The amended SIO now includes a

requirement for the PCC to provide information, in a prominent place on their website, on: information relating to the force's performance against the Government's national priorities for policing, Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS) performance reports on the force and, data on complaint handling.

Recommendation 13 (paragraph 30, page 50)

We urge the Government to review how IOPC, HMICFRS, and Coroners' learning recommendations are reported to the public in a more joined-up and meaningful way. We recommend that data be published centrally, in order to simplify and streamline access to this important information. (Paragraph 152)

Government Response

We agree that there is a case to provide greater co-ordination and clarification on recommendations being made by three separate bodies that sometimes overlap, as the Committee has suggested. As noted above, there are already measures in place to publish learning recommendations. The Government will consider this proposal and a proportionate response further.

The aforementioned bodies are independent organisations, and as such have their own policies and process to follow. HMICFRS publish all their recommendations on their website, including information about the relevant force, the cause for concern and a clear recommendation status.² Similarly, the coroners' website publishes all 'prevention of future deaths' reports, along with all relevant responses to each report.³ There are, of course, a high volume of such recommendations, and they will frequently be made in different contexts and carry different statutory weight.

As noted above, the Government will consider, with the IOPC, how it might be possible to better track progress against IOPC recommendations—and to publish this information. As part of this, we will explore possible join-up with other related recommendations made by other bodies.

² <https://www.justiceinspectors.gov.uk/hmicfrs/police-forces/data/progress-recommendations/>

³ <https://www.judiciary.uk/subject/police-related-deaths/page/2/>