

Garda Síochána Ombudsman Commission

Organisational Review

Future State Report and Recommendations

Final Report

25th May 2023



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Part 1: Executive Summary

Executive Summary

Introduction

The Garda Síochána Ombudsman Commission (GSOC) is an independent statutory body established in 2007 by the Garda Síochána Act 2005 (as amended) ('the Act') under the aegis of Department of Justice. GSOC is responsible for receiving, processing and investigating complaints made by members of the public concerning the conduct of members of the Garda Síochána.

GSOC also has statutory responsibility for conducting investigations in circumstances where it appears that the conduct of a Garda, or Gardaí, may have resulted in death or serious harm to a person. Such incidents are referred by An Garda Síochána (AGS) so that the public can be confident that these investigations are independently conducted. They also receive and investigate protected disclosures from workers of AGS.

In addition, GSOC conducts independent investigations of matters referred to it by the Minister for Justice, the Policing Authority, or matters which have been deemed by GSOC as meriting investigation in the public interest.

Background to the Project

The draft General Scheme of the Policing, Security and Community Safety Bill sets out changes to the scope of GSOC's powers, as well as changes in relation to a new Ombudsman/Deputy Ombudsman model, increased independence, and a changed remit. GSOC instructed Grant Thornton to carry out a business analysis in order to inform the planning phase of its organisational transformation, necessitated by the draft legislation. The project included:

- A review of GSOC's current structure and a proposal as to any required organisational change needed for the management and delivery of the full range of GSOC's services;
- The development and implementation of a workforce management capability consistent with the transformation, including identification of future skills/competency requirements; and
- Examination and recommend changes to GSOC's current operating model, processes, systems, and resource requirements, and provide a roadmap for the implementation of the recommended organisational change and transformation.

Project Methodology

Grant Thornton commenced work on the project at the end of May 2022 and delivered the required outcomes through a four phase methodology, namely:

1. Project Initiation;
2. Information Discovery;
3. Solution Build; and
4. Project Delivery

This final report marks the conclusion of the project and sets out Grant Thornton's findings and recommendations on the future state of GSOC's operations, structure, resourcing, workforce plan, processes and systems.

In terms of methodology, Grant Thornton have carried out a deep dive into the organisation by way of an extensive information gathering exercise including:

- Detailed survey issued to all staff;
- One to one interviews with senior management, managers, and other key staff;
- Process mapping of key processes;

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- One to one Interviews and workshops with an extensive list of key external stakeholders;
- Extensive document review; and
- An extensive external benchmarking process including reviews with police oversight bodies in the UK and internationally, as well as comparable Ombudsman organisations in Ireland and the UK.

Grant Thornton have also followed appropriate project management methodologies throughout, ensuring proper oversight, governance and control through a Joint Working Group with Grant Thornton and GSOC staff. This working group has met weekly. We have also initiated a project Steering Committee which has met as required through the project lifecycle in order to provide appropriate oversight, challenge and strategic direction.

Changes Arising from the PSCS Bill

Changes arising from the new legislation that will impact upon the Police Ombudsman remit and workload are outlined below and are considered in our recommendations throughout this report:

- The definition of serious harm has been amended to include victims of sexual offences and victims of abuse of power for a sexual purpose. It is expected that this will increase the number and complexity of investigations referred to the Police Ombudsman, but it has not been possible to determine the extent of the increase that will arise. However experience to date of cases of this nature suggest that this may be substantial;
- Supervised Investigations (S94(5)) currently undertaken by AGS will revert to the Police Ombudsman;
- The Police Ombudsman can refer agreed categories of service level complaints to AGS for resolution, however, if it appears to the Garda Commissioner that the complaint is not suitable for Garda resolution it can be returned to the Police Ombudsman for investigation;
- Incidents of Concern, where the Garda Commissioner becomes aware of an allegation (criminal offence and notifiable misconduct) made against a member of Garda Personnel which has not been the subject of a complaint, the Police Ombudsman must be notified and may undertake an investigation;
- The Police Ombudsman will have a new remit to undertake research and analysis in order to identify trends and patterns arising from performance of its functions;
- The current non-statutory Local Intervention process is now included in the Bill and will be subject to admissibility decisions;
- Complainants whose complaints are deemed to be inadmissible will be able to seek a review of the decision – this new statutory administrative review process has the potential to substantially increase workload depending on the numbers of reviews requested;
- The Garda Commissioner will also have a role in referring matters to Office of the Police Ombudsman if it appears to the Garda Commissioner to be in the public interest; and
- The remit of the Police Ombudsman will extend to all Garda Personnel and not just Garda Members as is currently the situation. The combined effect of the above and other aspects of the Bill may have a substantial impact on the workloads of the Police Ombudsman, although the extent of these workloads is, as yet, not fully quantifiable.

Recommendations

The key themes from our organisational discovery phase are referred to throughout the recommendations contained within this report. Our recommendations for the transformation of GSOC are grouped in this report under the following themes:

- Organisational Design Principles;
- Findings from external benchmarking;
- A detailed proposed workforce plan setting out new roles and grades for each of the teams within GSOC;

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- A new proposed organisational structure setting out our recommendation on how GSOC should optimally structure itself to deliver the strategy in a way that is operationally and financially effective;
- Recommendations on reform of processes and systems in order to transform operations to align to the broader GSOC remit set out within the draft legislation;
- Recommendations in relation to skills and capability gaps in the organisation that will need to be addressed in order to deliver the required future organisational capability; and
- A draft high level implementation roadmap.

Workforce Plan

Based on our in depth review of the current state of processes, systems, people, culture and leadership within GSOC, we have created a proposed workforce plan for the future Office of the Police Ombudsman which includes an increase in headcount between **180 to 239 FTE**. This would increase GSOC headcount from the current 169 FTE to **346 - 405 FTE (including current vacancies)**.

Our recommendations have taken account of both the significant backlogs of work that currently exist within certain areas of GSOC, the predicted future work volumes, and also the positive impact that we expect the organisation to be able to realise from improvements in process and technology. We have also considered best practice elsewhere, both within and outside the State, as well as the design principles for Public Services in Ireland.

We also stress the importance of properly resourcing the future Office of the Police Ombudsman to set the organisation up for success. Throughout our review we heard numerous external stakeholders and members of staff and management express the view that GSOC has never been properly resourced to deal with the work volumes it manages. We have noted that there are opportunities to improve both processes and technology in order to bring efficiencies, but considering the significant backlogs of work and cases that we found, it is hard not to conclude that the organisation has been under-resourced for a considerable period of time.

Therefore in considering the recommended workforce plan for the Office of the Police Ombudsman, we have sought to ensure that the future organisation is properly staffed to deliver timely, efficient and effective investigations that demonstrate rigorous civilian oversight of policing and the upholding of human rights on behalf of the citizen. In our view GSOC has an opportunity now to properly resource the organisation to deliver these outcomes. Failure to do so creates a significant risk of setting the future organisation up for failure.

In order to plan for future resourcing, we have provided three options for the workforce plan with Option 1 (base case) based on a figure of 2,300 complaints per annum. However, given that we have been unable to secure accurate data on complaint numbers, we have also included optional staffing models based on the Office of the Police Ombudsman receiving an additional 250 complaints per annum (Option 2) and a further 500 complaints per annum (total 2,800) (Option 3). The breakdown of these FTE and the complaints which they relate to is explained in detail in the Workforce Planning section of this report.

The plan includes significant extra resources within both the Operations (**+137 – 191FTE**) and Corporate Affairs Functions (**+43 – 48 FTE**) alongside **3 FTE** in the senior leadership structure (although these are direct replacements for the 3 existing Commissioners). The breakdown of grades of these new roles under the three options set out in this report are as follows:

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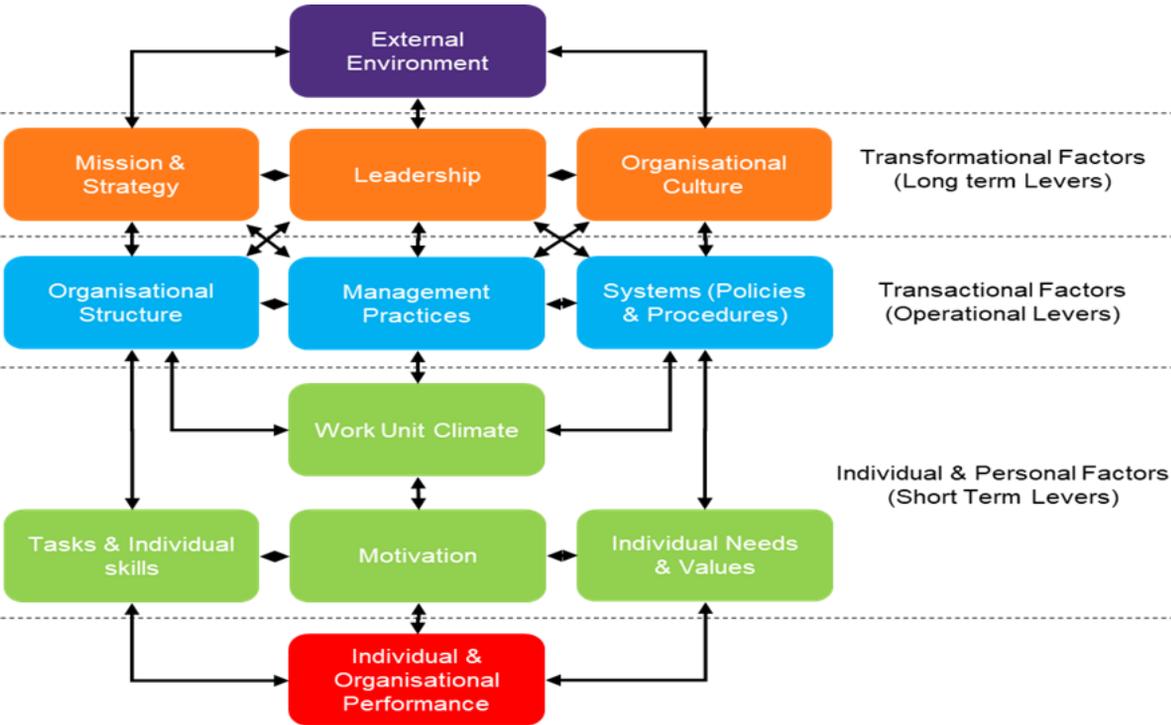
Grade	Option 1 FTE Increase	Option 2 Increase	Option 3 increase
Principal Officer	6 FTE	6 FTE	6 FTE
Assistant Principal	23 FTE	27 FTE	31 FTE
Higher Executive Officer	88 FTE	102 FTE	116 FTE
Executive Officer	45 FTE	52 FTE	63 FTE
Clerical Officer	18 FTE	21 FTE	23 FTE
Total	180 FTE	208 FTE	239 FTE

Part 2: Summary of Themes Identified from As-Is Review

Summary of Themes identified from As-Is Review

Introduction

In the extensive current state review carried out by the Grant Thornton team, we have employed the Burke and Litwin model (below) to the analysis of the data gathered. The themes identified emerging from this analysis are set out below against each of the “lenses” of the model and form a basis of how we have shaped the future state of the organisation. It should be noted that the current state review is not a separate report in itself and was based on data collected at that point in time – May to August 2022.



External Environment

In considering the external environment, we sought data and information from GSOC’s external stakeholders, and also gathered the views of staff via a confidential staff survey as well as extensive interviews and workshops.

Our staff survey (completed by 77% of all GSOC staff) asked staff their views in relation to the main external challenges facing the organisation. The highest percentage (37%) of respondents stated that the main challenge is over **public expectations and GSOC’s reputation** with staff pointing to an uninformed public perception of what GSOC does, and the outcomes of their work. They stated that this leads to a lack of public confidence in GSOC due to unrealistic expectations on GSOC’s ability in conducting investigations. The current Commission has recognised this, and are in the process of developing a new Communications Strategy which includes a mapping exercise for external stakeholder management.

A further 29% of staff viewed the main external challenge to be **the impact of the draft legislation and how GSOC responds to it**. Another 29% of respondents quoted **a lack of resources, high caseload, and lack of training** as the major challenge facing the organisation. We note that the current Commission has done extensive work and engagement on the draft legislation, inclusive of publishing two sets of observations, appearing before the Public Accounts Committee on the subject of resources, and holding a number of meetings with the relevant officials in the Department of Justice.

Summary of Themes Identified from As-Is Review

External stakeholders found common ground with staff in relation to the theme of public perception, quoting significant concerns with GSOC's approach to **managing stakeholder relationships**, as well as with the **quality and timeliness of investigations** and GSOC's lack of **transparency, information sharing, and communication** with them.

Mission and Strategy

GSOCs Vision is of first-rate human rights based policing oversight, contributing to trusted policing and a safe and secure society.

GSOCs Mission is to provide an independent, high-quality and trusted system for dealing with matters involving the possible misconduct of members of An Garda Síochána in a manner which respects human rights and promotes public confidence.

GSOCs Values are central to everything they do and guide them in their approach to how they do their work. They inform decisions and how they treat stakeholders and colleagues. GSOC's values include that of Courage, Respect, Integrity, Commitment to Public Service, Innovation, Trust, Impartiality, Independence.

Our Document review process examined GSOC's overall mission and goals, as well as a review of GSOC's statement of Strategy 2021-23. Although an extensive review of strategy is beyond the scope of our project, we did note that the current strategy as articulated does appear to deal with the majority of the strategic organisational challenges we identified in our As-Is Review. The document sets out objectives and measures of success, but we did note that it provides limited guidance on **how** GSOC intends to achieve these objectives, mainly due to the lack of specific timelines or assigned responsibilities. A high level plan with timescales and owners against each objective would, in our view, help to focus efforts on these outcomes.

Further, a number of the stakeholders that we interviewed questioned GSOC's strategic direction and purpose. In particular they noted the lack of a clearly articulated stakeholder engagement plan (although we understand that GSOC are currently working on this) including MOUs and protocols and also missed opportunities to engender public confidence in police oversight and in the wider criminal justice system. Staff were also somewhat unclear in relation to how their individual roles contributed to delivery of strategic outcomes.

In relation to staff, when asked about the statement "The overall aim and goals of GSOC motivates me to contribute more than normally required", 53% overall agreed with the statement (with only 12% disagreeing). This demonstrates that although staff may be critical of how the organisation is run, they are engaged by the purpose and mission of GSOC.

A summary of our view of the main strategic challenges currently facing GSOC is as follows:

- The organisational response to the draft Policing, Security and Community Safety Bill, in particular the proposed major changes to GSOC's remit and powers, and the change to an Ombudsman/ Deputy Ombudsman model. Managing this transition in addition to continuing to effectively deliver GSOC's function will be one of the main challenges for GSOC in the coming years;
- In relation to investigations, the ever-changing environment in terms of technology, information environment, the law, data protection, privacy and security requirements, communications and the nature and increasing complexity of cases, (many of which are time consuming, sensitive in nature and require more specialist resources) provides a strategic challenge. This manifests itself in relation to the skills required to respond to investigations involving these themes, and how GSOC secures these skills;
- Resourcing and workforce planning, both for current operations and in response to the planned expansion of GSOC powers. Staff across the organisation report heavy workloads, and stakeholders consistently complain about the length of investigations;
- Operational effectiveness, and in particular the efficiency of internal processes, systems, controls, approvals, oversight and governance;

Summary of Themes Identified from As-Is Review

- Relative digital immaturity and challenges with the effectiveness and efficiency of the current ICT environment within the organisation supporting overall organisational effectiveness;
- Use of data to measure performance, efficiency and effectiveness, as well as supporting effective planning and deployment of resources. In addition to GSOC's ability to provide statistical information on complaints, trends and human rights considerations is limited;
- Leadership and people management practices, as well as organisational culture, ways of working, and staff behaviours;
- Risk management practices, framework and definition of risk appetite; and
- Improving stakeholder engagement and helping engender public confidence in policing and the wider criminal justice system;

Leadership

When asked about the biggest internal issues facing GSOC, one fifth of respondents to the staff survey stated that the biggest problem is a **lack of leadership and vision**. They suggested that there is a failure from management to listen to staff. Staff stated that the management structure is largely hierarchal, with a perceived disconnection between senior leadership and the rest of GSOC. There is a stated view that GSOC should ensure effective management at the most appropriate level, so that decisions can be made at the right level without delaying operating processes.

Survey respondents suggested that leadership should **stand up for GSOC and their work externally**. Currently GSOC's leadership are described as being "task-driven" as opposed to "people oriented", with comments suggesting the existence of a **blame culture**, with mistakes seized upon. There was concern expressed by some of our interviewees, including in the staff survey, around a focus on detail and processes in how they were managed on a day to day basis, which could prove a challenge as GSOC transforms and line managers need to have the autonomy to manage their teams with discretion. General comments were made that leadership should be proactive, knowledgeable, decisive, fair, approachable, open, encouraging and trusting.

Staff also noted that they are seeking clarity from leadership in the areas of **communicating and providing direction**, providing **support and guidance**, and **better engaging with staff and understanding their roles**, in particular, understanding the detail of what each role entails. The Commissioners noted that the concerns outlined regarding quality and culture may have impacted upon decision making being aggregated upwards. However, we believe that the establishment of the Quality Management Unit and the implementation of Learning and Development as set out in these recommendations should address concerns regarding capability, and therefore provide assurance to support devolved decision-making.

We also recognise the relatively new tenure of the current Commission/Directors and the steps that have been taken in the last two years to address some of the issues which include:

- A new Statement of Strategy, which sets out a vision for the organisation;
- A Learning and Development Strategy;
- Improvements in governance including a review of risk management, the establishment of an independent Audit and Risk Committee, and the establishment of an internal audit service;
- Changes in how the governance of the organisation is managed, with weekly meetings with the Commission and Directors; and
- Delegations of authority for decisions, in an effort to ensure that decisions are made at the most appropriate level – including for instance:

Summary of Themes Identified from As-Is Review

- Delegation of authority for section 10 search warrants;
- Devolution of responsibility with respect to decision making;
- Improved internal operating processes;
- Delegation of greater decision-making powers from the Commission to Directors, DDOs and SIOs;
- Appointment of a DDO to head up and take responsibility for the CaseWork Unit to ensure decisions are made at an appropriate level with oversight by a manager producing a more efficient service to the public in the processing of complaints;
- Changes to process to empower decision-making by managers; and
- Establishment of a Quality Management Unit with responsibility for setting standards for operational quality and establishing processes to give assurance regarding compliance and performance in accordance with standards.

Organisational Culture and Work Unit Climate

39% of staff respondents to the survey highlighted the positive aspects of the culture within GSOC, in which it was described as being **passionate, supportive, fast-paced, organised, collegiate, friendly and hardworking**. Respondents highlighted that although the culture within each unit can be collaborative and people oriented, however, between units there is a lack of interaction and communication, which the factor of under resourcing and high workloads impacts upon.

26% of the respondents to the staff survey quoted the **organisational culture** as the biggest internal challenge facing GSOC. They described the culture as insular and regressive which manifests in management being defensive and change resistant. They noted an embedded **cultural aversion to risk taking**, coinciding with **slow decision making**. Staff perceive the requirements for work to be signed off from the top down as **bureaucratic, delaying processes** and **limiting the opportunity for innovation**.

Staff also noted a **lack of delegation, cohesion and empowerment**, contributing to low staff morale. Staff have commented that interdepartmental communication and **cross functional collaboration** could be improved, which would greatly impact the organisational culture and morale, whilst removing 'silos', and the **"tense internal atmosphere"**. It was also noted that **28% of the respondents to the survey have been with GSOC for less than 1 year**, and that the expansion in GSOC staffing levels partly explains this.

The external stakeholders that we interviewed were also often critical of the culture of GSOC based on their experience. They described a **defensiveness and closed approach** from GSOC to their engagement with stakeholders, their communications, and an **overall lack of transparency**. Similarly stakeholders reported what they described as a visibility issue with GSOC – that the work isn't fully understood and that other agencies need to understand that and also determine how they can work better together.

Grant Thornton presented these themes identified on Leadership and Culture to the Commissioners and Directors in Autumn 2022, and they recognised the need to address the points raised. They have begun work to help transform leadership and culture in GSOC in preparation for a wider organisational transformation programme. Our survey and other information gathering was conducted in June 2022, and views reflected throughout the stakeholder engagements within this report are reflective of the views of staff and other stakeholders expressed at that time.

Organisational Structure

When asked whether the current structure of the organisation is fit for purpose, 42% of respondents to the staff survey stated that it is not fit for purpose. In relation to their reasons for this response, staff quoted a **top heavy** structure, **insufficient resources**, and the **siloed nature** of the organisation.

Summary of Themes Identified from As-Is Review

The current Commission believe that this is a legacy matter and a long embedded way of working in GSOC, and are making efforts to embed a more inclusive approach to leadership. Staff also reported a lack of support for matrix projects or working. We noted that matrix projects have been attempted, however there appears to be a cultural reluctance in the organisation to embrace this way of working.

Comments from staff and stakeholders suggest that the three person Commission as it has operated in the past has been ineffective. As noted above, we recognise that the current Commissioners are taking steps to address issues with leadership and operational management. Notwithstanding this, we noted the views expressed by both staff and external stakeholders that GSOC has lacked the presence of one clear voice, or face of the organisation. We noted that the new draft legislation attempts to address these matters through the creation of Ombudsman, Deputy Ombudsman and CEO roles.

Staff also raised concerns that there are currently **insufficient staffing levels** in GSOC, resulting in very high workloads. This impacts upon the service that the public receive. Thus, it is our view that there is currently not enough capacity across GSOC to react to urgent investigations without other investigations suffering. Concerns were highlighted regarding the poor governance and functional structure in GSOC, stressing that the organisation is ill equipped to conduct research, analyse data and to engage in public policy analysis.

We noted that the above has been a result of both inadequate staffing, and also due to the ad hoc nature of how additional functions have been added on to an existing structure over the years, resulting in a shift in priorities. It is our view that the Office of the Police Ombudsman will require a strong governance core with a focus on the data and core issues. We believe that this will help the future organisation to identify current and emerging issues relevant to its work, to formulate its views, policies and strategy, and to engage with relevant stakeholders to influence key outcomes.

When asked how they would like to see the structure changed in the transformed organisation, staff suggested three main changes, including **ensuring adequate resourcing**, a **clear leadership structure with delegated decision making**, and **encouraging opportunities for cross functional collaboration**.

Management Practices

In our interviews and workshops with management and staff across GSOC, we questioned current practice in the area of **People Management**. From the staff survey, 65% of respondents agreed with the statement that “My manager supports me and my career”, a positive finding. In addition, 71% of respondents agreed with the statement that “I am clear on the roles and responsibilities of my colleagues and myself”, suggesting that they have strong understanding of their own roles. However, these staff were less clear about how their role contributed to the delivery of GSOC’s overall strategy.

Some staff also highlighted a lack of communication and engagement between themselves and their manager and report “feeling ignored”. The mentality of getting the work done appears to take priority over a focus on personal development and career progression. Staff report that there is a lack of regular one-to-ones to provide feedback on performance, and a lack of time given to staff from management level to focus on personal development.

In relation to **decision-making** the staff survey showed that only 27% of respondents agreed with the statement that “decisions are made at the appropriate level in GSOC”. Respondents raised concerns surrounding the management structure, **lack of trust** and a **blame culture hindering decision-making**. GSOC is described as being **overly bureaucratic** with multiple approvals required. The blame culture described results in reluctance by staff to make decisions. Therefore, there is too much upward decision making and reliance on the Commission as staff are not empowered to take on responsibility and to make certain decisions.

Summary of Themes Identified from As-Is Review

Staff survey respondents also highlighted that managers are not supported enough by their own line manager due to time constraints, pointing to the issue of the high workload impacting upon the overall structure and support network. A number of staff comments in the survey responses suggest that issues that are brought to managers are sometimes not prioritised early enough, although managers' workload may be a factor impacting on this. It was reported that there has been a **lack of visibility and engagement with senior management** (unless there is a problem), and they were described as **slow to make decisions, which impacts on both, the staff and customer experience**

Systems (including Processes and Procedures)

Our assessment of the strategic challenges facing GSOC outlined a number of issues relating to systems and processes, namely;

- Operational effectiveness, and in particular the efficiency of internal processes, systems, controls, approvals, oversight and governance;
- Relative digital immaturity and challenges with the effectiveness and efficiency of the current ICT environment within the organisation supporting overall organisational effectiveness; and
- Use of data to measure performance, efficiency and effectiveness, as well as supporting effective planning and deployment of resources.

In relation to **processes**, we asked staff whether the processes in place are mostly efficient, and only 23% of staff were in agreement with this. Respondents acknowledged that the **current legislation** as it is constructed made for inefficiencies, lengthy timeframes for resolution of low level complaints, and convoluted processes, all of which can result in delayed outcomes.

We note the variety of contributing factors towards these delays which can include resourcing issues, the complexity of some investigations, and elements of investigations which are outside of GSOC's control (e.g. GSOC's reliance on other agencies such as An Garda Síochána, and also witness co-operation).

In relation to the **IT systems** in operation, these were described by management and staff as being "not fit for purpose", in particular the Case Management System (CMS) and the ORION (SharePoint) system. The CMS is described as a slow, onerous system, which delays the ability of staff to complete tasks in a time efficient manner. Comments were also made in terms of the functionality of that CMS system, and the suggested implementation of software programmes that can do specific tasks digitally that are currently undertaken manually (which is time consuming).

It is important to acknowledge the ongoing work on the CMS and SharePoint upgrades since this section of the review was completed in September 2022. Updating and procuring a new CMS has become a key priority for the senior leadership team in GSOC, with good progress made over recent months.

In contrast, in the survey, staff were asked about the technology available in GSOC and whether that allows them to carry out their tasks efficiently. 52% of respondents stated an overall agreement with this statement. For those seeking an improved ICT environment, the majority mentioned a new CMS system as well as the SharePoint system, ORION, that is described as not user friendly, difficult to navigate and the search capabilities are very poor. Additionally, ORION is not actively used by all business units, therefore highlighting inconsistency in practices across GSOC.

We also noted significant deficits in relation to the current provision of Learning and Development (L&D) within GSOC. The GSOC L&D strategy (2021 – 2024) has been published and within this we see a need for an enhancement of the current Learning Management System (LMS) to provide better capability in terms of functionality and data.

Stakeholders were critical of the lack of available **data** from GSOC, noting that when this is requested, it is often either not available, or that there are significant delays in procuring the data. Stakeholders raised concerns about the availability, timeliness and reliability of data from GSOC, and we noted the **lack of data analysis capability** and capacity within GSOC in comparison to other comparable organisations.

Summary of Themes Identified from As-Is Review

At the time of our review, **Risk Management** was also identified as a process gap within the organisation, and managers expressed frustration with the lack of a risk management framework, risk appetite statement, and risk management practices. We note that a risk management policy, risk appetite statement and framework has recently been approved. The objectives of this are to set out the arrangements that constitute how GSOC appropriately manages risk. In particular, the framework sets out the role for risk management in the organisation, documents a risk management methodology which is in line with best practice, and sets out the responsibilities for different stakeholders in the organisation.

We note that recently a Chief Risk Officer has been appointed to take responsibility for this process alongside the implementation of a Risk Management Group to oversee the process and ensure that actions to mitigate risk are addressed. They are also responsible for providing a regular Risk Management Report to the Commission for consideration.

It should be stated that GSOC are making strides to address some of the other shortfalls outlined above, including a quality management action plan having been drafted and a proposal developed for the implementation of a **Quality Management System**.

Tasks and Individual Skills

In the survey we asked staff to comment on whether they felt they had **sufficient skills and experience** to effectively and efficiently carry out all tasks related to their role. Only 13% of respondents disagreed with this statement (26% were neutral). For those who disagreed or were neutral, they pointed to an insufficient provision of learning and development opportunities for staff to enhance their own knowledge and skillset.

Our review also reflected that management believe that very demanding workloads have had a 'knock on' impact on learning and development across the organisation. This has meant that it has been challenging to provide opportunities to learn to all staff whilst delivering the outcomes of investigations which are timely, efficient, effective and comprehensive. It is our view that a blended approach to learning and development, which emphasises experiential learning and development, backed up by formal training, is the best approach for the future organisation.

Both stakeholders and GSOC management pointed to the ever-increasing complexity of the investigative environment and the increasing requirement for skills in specialist areas including digital forensics, cyber crime, serious sexual assaults, and dealing with vulnerable people. GSOC have difficult decisions to make in relation to determining which of these skills to develop in-house or recruit into, or whether to procure externally. There is a Learning Management Systems (LMS) in place that is being developed and enhanced as one part of the solution to this challenge.

Resourcing in the organisation was a significant theme arising from our review. In the survey, staff were asked whether in their view their team is adequately staffed to effectively fulfil its requirements. Only 27% of respondents agreed that their team is adequately resourced, and staff pointed to high backlogs of work across the organisation. Stakeholders, and in particular the Unions backed this up and pointed to **unsustainable workloads** and **high stress levels** amongst GSOC staff.

Management also reflected their belief that workloads in general are "unrealistic" and leave the organisation "open to serious risk" due to the lack of resilience to respond to surges in demand or major incidents. In addition, middle and senior management consistently described high staff workloads across the organisation, and the term "unsustainable" was used to describe workloads on a number of occasions. A number of external stakeholders also provided the view that GSOC is currently "under-resourced".

Motivation and Individual Needs and Values

Our review of GSOC found an organisation where there is a strong identification amongst staff of the positive impact that their work has on society.

Summary of Themes Identified from As-Is Review

In response to survey questions such as “The overall aim and goals of GSOC motivates me to contribute more than normally required”, and “I get job satisfaction from my work”, we received positive responses from staff (only 18% and 12% respectively disagreed with the above statements). This suggests **strong levels of intrinsic motivation** amongst staff who clearly see the positive impact that their work can have.

However, in contrast, when asked whether they receive “appropriate recognition from GSOC for their efforts”, only 36% of respondents were able to agree with that statement. This suggests a significant missed opportunity from GSOC leadership to capitalise on the positive sentiment that their people bring to the workplace. Staff mention low morale, high workloads, that they are not consulted with or “respected”. All of these factors will negatively impact on motivation levels.

It is our experience that organisations can only rely on the “intrinsic motivation” and “discretionary effort” from their staff for a certain period before this “currency” becomes exhausted. It is our view that GSOC is reaching a “tipping point” in terms of staff motivation, and managers are already reporting challenges in retaining and replacing experienced people. Interventions to address the points raised above will be important in order to “stabilise the ship” whilst GSOC prepares itself for the transformation journey ahead.

Individual and Organisational Performance

It was noted from our review, that although formal individual performance management is practised within GSOC, we were unable to see use of specific performance metrics and KPIs in place within the organisation. Therefore any measurement of individual staff performance and productivity is difficult to establish.

69% of respondents to the staff survey stated that they believe GSOC is **ineffective in delivering services to customers**. It was reported that the legacy issues and unnecessary involvement from management level in various decisions results in GSOC being unable to provide a timely service to customers. They also noted the lack of resources in the organisation as a whole to address the high workload, and suggested that customers’ expectations are not managed sufficiently, which may have been compounded by legacy issues referred to earlier.

Similarly, external stakeholders expressed frustration with an inability to be able to measure GSOC’s organisational performance in key areas such as timeliness of dealing with complaints and concluding investigations, as well as the quality of outcomes. Notwithstanding that lack of available data, external stakeholders were in the main quite critical of GSOC’s organisational performance.

As noted above, these stakeholders reported very significant concerns over what they considered to be poor stakeholder engagement and communication, a lack of transparency and information sharing, and real concerns about the quality (in terms of perceived fairness of outcomes) and timeliness of dealing with complaints and investigations. Our review has found that GSOC is staffed with highly professional, committed and dedicated staff, but based upon the evidence gathered we must conclude that there are current shortfalls in performance which should be addressed.

Recommendations

The themes identified, as well as the design principles and the outcomes of the external benchmarking process (below) have informed our detailed recommendations for GSOC’s future state set out in this report.

Part 3: Design Principles

Design Principles

GSOC Design Principles

Central to the remit of GSOC and the future Office of the Police Ombudsman is civilian oversight of policing and the upholding of human rights. The organisation plays a significant role in ensuring that the police do not misuse their extensive powers in relation to human rights and the liberty of the Irish public. Most notably, is the role of the Office of the Police Ombudsman in Article 2 and 3 investigations which are critical to holding the state to account under the European Convention on Human Rights. Therefore, along with sources mentioned below, we refer to the importance of this fundamental function and use the prioritisation of human rights and civilian oversight of policing to anchor the design principles set out for the future body.

Following our work on the current state of the organisation, we met with GSOC senior teams on a number of occasions to help create a set of design principles for the organisation which have been used to shape and guide the proposed workforce plan as well as future strategic priorities within the organisation.

We have also considered the Department of Public Expenditure and Reform (DPER) publication “Designing Our Public Services” which sets out design principles for government in Ireland, and we have considered how these should influence design principles within GSOC. In particular that report states:

“Evidence from around the world shows that design is a powerful tool for transformation and innovation in how public services are delivered. This is not design as we have known it previously, limited to aesthetics or communications considerations – but the holistic design of service experiences and delivery focussed on the needs of people.”

This holistic approach of bringing international best practice through comparable benchmarking as well as putting the “customer” at the heart of future state design for GSOC (and the future Office of the Police Ombudsman) is reflected in the design principles we co-created to guide our work on organisation design and workforce planning. Those design principles are:

- GSOC/ the Office of the Police Ombudsman will use the transformation opportunity presented by the new legislation to build a professional, agile and innovative organisation;
- GSOC/ the Office of the Police Ombudsman will seek to put people at the forefront of everything they do, providing a quality service that meets the needs of all stakeholders and upholds their human rights;
- GSOC/ the Office of the Police Ombudsman, as a civilian police oversight body, will seek to promote public accountability of policing through transparent communications and effective engagement with external stakeholders;
- GSOC/ the Office of the Police Ombudsman will develop a clear leadership structure, which facilitates alignment of objectives and delivery of the long term vision and strategy;
- GSOC/ the Office of the Police Ombudsman will prioritise its staff, and make the organisation a great place to work. It will embed a learning culture and seek to be an organisation where continuous improvement and staff development is at the core;
- GSOC/ the Office of the Police Ombudsman will define appropriate spans of control and organisational layers. It will adhere to this principle to ensure effectiveness and efficiency of organisation design is enhanced and maintained;
- GSOC/ the Office of the Police Ombudsman will seek to prioritise cross-functional collaboration across all units to ensure knowledge is shared and reused; and
- GSOC/ the Office of the Police Ombudsman will encourage innovation to find better ways of working in response to complex policy and service delivery challenges.

These supplement the design principles published by DPER in ‘Designing Our Public Services’, as well as wider Civil Service renewal and reform.

Part 4: Processes and Systems

Processes and Systems

Introduction

As part of the organisational review the Grant Thornton team reviewed the processes and systems in GSOC. The team held a number of process and system workshops with staff members across a number of units in the organisation. The processes reviewed were as follows:

How Queries are dealt with upon receipt

- How enquiries are conducted
- Admissibility process
- Inadmissible process notifications
- S94(1) unsupervised investigations process
- Local Intervention process
- Closures
- Designation Process
- Allocations Process
- S95 Disciplinary investigations
- S98 Criminal Investigations
- S102 Process
- Reporting at the end of an investigation process
- Legal Processes
- Protected Disclosures Process
- How Strategic Decisions are received and recorded by the Secretariat

Through these workshops, the Grant Thornton team found that overall there are individual process areas which could be improved, particularly in relation to approvals and oversight. However, it was also evident from the workshops that there is to an extent a culture of continuous improvement across GSOC, in that the employees are constantly looking for ways to be innovative and find improvements and more efficient processes and ways of working to carry out their roles. There were a number of examples given from each unit around the methods employees undertook to improve their processes themselves as far as they could.

It was acknowledged by the majority of participants that many of GSOC's process steps are defined by legislation and that it is often difficult to change processes due to the requirement that policies adhere to the legislation. Despite the constraints of the legislation, we have recommended a number of adjustments and improvements in the processes that we have reviewed, and these are set out below.

Investigations

We identified opportunities for process improvements in the investigations process, particularly at the beginning of investigations with regards to the designation and allocation of cases.

In relation to case categorisation, it is recognised that GSOC recently stopped using A, B and C to categorise cases. We recommend that GSOC capitalise on the new triage system and ensure that cases are categorised in relation to the specialised teams or location structure and are allocated to the correct team by the triage unit.

Closing of investigations

Through our review, we found that the closing of investigations can be a time consuming and inefficient process. We noted that there is too much reliance on the senior staff members in this process, which causes significant delays. However, it is recognised that this process has recently been improved, with authority recently devolved to SIOs and DDOs to close cases in certain categories, and make decisions in relation to sending files to the DPP where criminal offences are identified following investigations.

There are currently 30% less open investigations on-hand compared to the comparable period last year due to the improvements in this process.

Processes and Systems

S102 investigations are closed by the DDO's. It was reported that there can be significant delays in waiting for DDO's to close cases, that it may take between six and twelve months for a decision to be made on a case. We recommend that the training, authority and power to make decisions is given to SIO's on these cases, and that the DDO 'endorses' the decision that the SIO makes rather than them having to read the report and make a decision themselves. The SIO will be extremely familiar with the cases that they are responsible for, and therefore will be able to make decisions quicker than the DDO who is further removed from the case.

On call

Our review heard frustrations expressed from different stakeholders over how the On Call team is resourced and run. The current process is that the On Call rota is done by working unit, meaning all employees on call each time are based out of the same location. This can cause severe delays in On Call teams arriving at the scene of the investigation, if the team on call is based a considerable distance from the location. We recommend that the On Call teams are no longer rostered by working team, but that the rota is done with investigators from each geographical location on call for each rotation. This will allow for investigation teams to have a wider spread of geographical locations that are easily accessible to them than if they were all based out of the same location.

Our proposed structure for this would be to move towards an On Call cadre composed of a minimum of 48 investigators and that each On Call team would consist of 2 investigators based in Cork, 2 investigators based in Longford and 4 investigators based in Dublin rotating to be on call one week in every six weeks. We recommend that the on call SIO continues to be rotational. Although this may mean that investigators are reporting to more than one SIO at any given time, we believe this is the most efficient way to service all locations throughout Ireland. Furthermore, recruitment will need to proportionately apply to each of Dublin, Cork and Longford to ensure there are enough investigators who can fulfil the On Call rotation on a location-basis.

We also recommend that the On Call team on rotation does the initial tasks for an investigation that may be outside of normal working hours, and then hands the investigation over to a team that is based in the office closest to the investigation. For example, if the on call team responds to a case based in the south-west region of the country, the On Call team will carry out the initial investigation tasks until the normal working hours resume, and will then pass the case to the investigations team in Cork. We recommend that this change could be dealt with expeditiously in order to demonstrate responsiveness and agility in GSOC leading change.

Currently within GSOC, all those involved in active investigations who have opted in to the on call rota receive an on call allowance which is compensation for attendance during out of office hours, unsocial working hours, and for the inconvenience of being available to be called from home. The allowance is currently set at €11,322 for SIOs and IOs and €9,949 for AIOs. This allowance is part of the terms and conditions of employment for those role and is pensionable.

In relation to the On Call allowance contained within the Section 172(5) of the PSCS 2022 bill, there is a commitment to the current staff that their terms and conditions will not be less favourable. As a result of this, we are proposing that those who currently have the allowance as part of their Terms and Conditions (or are sanctioned to do so) retain this. This amounts to a total of 50 employees who have the allowance. Equally, those hired through recruitment already ongoing and published with current terms and conditions attached, should continue as such. It is important that this includes allocating resources with allowance from this recruitment panel to Cork and Longford to ensure those teams have enough resources to sustain the On Call rotation.

Going forward, we recommend that each of the employees who receive the On Call allowance are required to continue to subscribe to the On Call rota. It is noted that there are currently employees within GSOC who have chosen to 'opt out' of the allowance and the On Call rotation and this option should remain available.

We propose that the allowance is not made available to new hires and as a result they would not be required to subscribe to the rota. We recognise that this may be challenging from a recruitment perspective, however on the balance of needing to manage future resources and cost inflation, as well as maintaining the promise made to current staff, we recommend that this is the best option.

Processes and Systems

In relation to the On Call procedure, we also recommend that the Office of the Police Ombudsman retain comprehensive records of call outs as well as hours spent on call outs to ensure compliance with the Organisation of Working Time Act 1997.

Major Incidents

We also recommend the establishment of a Major Incidents Team to deal with those cases that are considered for significant or high profile investigations.

Having staff that are specifically trained to deal with high profile or urgent cases will increase that quality of the investigation of these cases. Currently regular investigations staff are completing cases classed as 'Major Incidents' in addition to their regular case load, which may cause delays in regular investigations, and may impact the quality of the investigations for major incidents. Establishing a team dedicated to major incidents within the investigations unit will ensure that there is no impact or delay on any ongoing investigations as a result of the commencement of high profile or major investigations.

For periods where there are no major investigations, this team should support other teams in the undertaking of investigations, hence a team, rather than a unit to avoid periods of inactivity.

We also recommend that GSOC sets up a designated secure area within its offices for major incidents, where all information, evidence and equipment can be stored safely and securely, and where the major incident team can work solely on these cases without distraction. We also recommend having an incident room co-ordinator who is responsible for all work undertaken within the major incident rooms, and is the point of contact in co-ordinating the cases in the rooms.

Casework

A number of process inefficiencies were identified by the casework unit, in particular surrounding the admissibility process and the complaints form.

Staff raised concerns regarding the complex nature of the admissibility process. Caseworkers must analyse the case, make a decision on admissibility, and provide justification on why they believe the case is admissible. There is extensive criteria for cases to be admissible, and casework must assess the case to decide whether it is criminal or disciplinary.

Often staff need to refer the case to other units before making an admissibility decision. Although it was noted that response times are adhered to and often met before the targeted timeframe, staff note the potential of lengthy delays, as Garda policies held in the Library are not permitted to be shared across the organisation. Therefore, each time a caseworker or investigator needs to access a Garda directive, they must raise a request with the Library unit, adding further complexity and lengthening the duration to the process. This is outside the organisation's control and is currently an AGS requirement.

Therefore, we recommend the facilitation of training for certain employees within the casework unit to ensure that they are all equipped to make admissible/inadmissible decisions, without the need to consult elsewhere (thus delaying the process). With the introduction of the new legislation the casework staff will be working with a number of types of cases that they don't currently deal with. This should be considered in the training provided to casework members.

A significant number of the complaint forms received by the public do not have the required information for an admissibility decision to be made, resulting in the AST unit sending a further information request to complainants, delaying the process further. It was reported that over 50% of enquiries received require further information requests. As such, we recommend GSOC reviews the current complaint form, and considers including mandatory fields, or tailors the questions currently asked, to ensure all of the required information is provided. It is recognised that changes to the GSOC1 form are already underway.

Processes and Systems

In other cases, complainants provide a breadth of unnecessary and potentially irrelevant information on the event in question, providing numerous pages of information for the screener to analyse in order to find the relevant information to proceed with the case. We recommend enforcing a maximum characters or word limit into the form questions, particularly for the online forms. This will in turn improve the timeliness of admissibility decisions being made.

Additional concerns and frustrations were raised in relation to the manual workload involved for the AST unit in notifying and sending acknowledgements to complainants. As such, within the implementation programme of a new CMS, we recommend automation of acknowledgements, allowing for the utilisation of a properly functioning CMS system. As a result, this will improve both, efficiency and timeliness of the overall process.

Legal

Throughout our consultations with the Legal Unit, we found that overall the processes are efficient, with only a small number of minor inefficiencies. However, there is a significant lack of resources in the unit. We found that the most time consuming processes for this unit are Preparing for Trials, and Non-Party Disclosure cases, in addition to the advisory services that the unit provide. The unit carries out these processes themselves, with no reliance on outsourcing. However, other parties such as the DPP and state prosecutors are involved throughout.

The interactions between the unit and the state prosecutors was noted as one of the inefficiencies in the process. GSOC legal reported that currently, the state prosecutors that are dealing with GSOC are inconsistent and often do not see the work of GSOC as a priority. Different people are assigned the cases each time, which makes it difficult for the Legal Unit to build good relationships with the prosecutors. They report that the prosecutors often take long periods of time to respond to GSOC, and complete the work, which causes lengthy delays in the overall process.

We recommend that GSOC consults with the DPP and requests having a smaller number of dedicated prosecutors for their cases. These prosecutors should be familiar with GSOC and what they do, and ideally would have experience in similar cases. This would allow for the legal unit to build stronger relationships with a smaller number of people, which would make it easier to get work completed. This will significantly speed up the overall legal processes, which in turn will lead to a better overall experience for complainants, which should improve the reputation of GSOC.

We also recommend that the more junior legal staff are equipped with stronger skills to advise on legal matters themselves, which will decrease the workload of more senior staff members in the unit. The number of advisory requests has increased significantly in the last number of years, causing a great strain on the senior resources in the team. It is recognised, however, that measures have been put in place in certain areas in the organisation to reduce the number of advisory requests being sent to Legal. The workload for advisory requests should be spread more evenly across all levels, with the more junior members of the team should be tasked with responding to the more routine advisory requests, and the more senior members advising on the more complex and non-routine requests.

CMS and LMS Systems

Throughout our consultations, the Investigations Unit reported the poor functionality of the current Case management System (CMS), which impedes significantly upon the efficiency of their processes. As such, GSOC recognises that the CMS is out of date, and a process is underway to procure a new system. We recommend that the new CMS has the capability to provide statistics, research, and a reporting and data analytics functionality to assist in the investigative and associated reporting processes. This will allow staff to minimise or do away with their reliance on Excel spreadsheets, reducing errors and improving the audit trail and overall efficiency. As such, we recommend that sufficient training is provided to staff to ensure they have the knowledge to maximise the use and benefits of any new system.

Processes and Systems

We also identified a significant requirement in relation to managing learning within GSOC. We noted the work GSOC has done in relation to producing an L&D strategy and we have also made recommendations in the workforce plan below in relation to specialist L&D staff. We also recommend that GSOC further utilise the current Learning Management System (OneLearning) with training relevant to GSOC's specific skills requirements, and some of the more general skills required by GSOC. Ultimately this will help improve staff competence and engagement, and should help reduce staff turnover.

Paper files

There is currently a reliance on paper files in a large number of the processes, particularly in the AST team. The AST team are required to print and scan a large number of documents. There is also an expectation on them to store large numbers of documents and folders relating to cases and investigations. The information on these documents is stored on the CMS, and also it is currently required for the documents to be kept in hard copy. It is our view that GSOC should be actively taking steps towards a paperless future.

We therefore recommend that GSOC as a whole are more conscious not to print documents unnecessarily and that they should seek to rely on the soft copy versions of documents where possible. GSOC should engage with external stakeholders who are requesting paper files, and challenge the need for paper based files, to try and facilitate the exchange of file in electronic forms, consistent with a paperless approach and obligations under climate action commitments.

Templates

Throughout our consultations with staff across the various units within GSOC, staff reported a lack of consistency in branding across reports completed by different units. The impact of this includes a poor customer experience and extra time being spent on preparing reports, which directly impacts upon the timeliness of the processes. As such, we recommend that GSOC ensure that the current templates and guidance documents are made accessible to all relevant staff, and also ensure that staff are aware that they are available. This should reduce the inconsistency in reports and other documents being developed, and speed up the report writing process.

It is recognised that training has been provided to staff on templates that are available, however, we recommend additional training for staff who may have joined the organisation since the initial training was rolled out. It has been noted that the use of templates, particularly for correspondence, tends to discourage staff from thinking about the appropriateness of what is said in correspondence. In addition to the technical ability to use templates, staff training needs to address issues regarding the appropriateness of what they are saying in correspondence, to discourage routine cut and paste, and to adapt templates according to the situation they are dealing with and the particular addressee.

Vehicles

We recommend that the use of GSOC vehicles for investigations, and the allocation of vehicles per staff member in each of the offices is reviewed and assessed. There is currently an imbalance between the number of vehicles available for investigations staff and the number of staff in each office. We recommend that the vehicles are spread across the offices based on the number of investigations or investigators in each office.

We recommend that for On Call staff, the investigators are encouraged to use whichever vehicle is most easily accessible (including their own vehicle) and not solely rely on the On Call vehicles. It is often the case that the staff have had to make their way to the office to collect the On Call vehicles to go to a scene rather than using their own vehicle, which in the past has caused significant delays in the times it takes for investigators to get to a scene.

Processes and Systems

Pulse Requests

One area where we recommend improvements is around the Pulse requests, and the access to pulse information. Pulse information is only able to be accessed through one locked computer in the Dublin office. There are only a small number of people who have access to this and are able to process the requests. This lack of accessibility can cause significant delays in the investigations process. We recommend that GSOC increase the number of investigators that have access to Pulse information. We also recommend that GSOC increase the number of access points to more than one computer, and provide at least one point of access in each of the GSOC offices.

It was also noted that An Garda Síochána now have access to Pulse information on their phones, making it quick and easy to access. This should therefore make it much easier to allow GSOC such access via An Garda Síochána. We recommend that GSOC considers this for a number of investigators to reduce the time delays in waiting for Pulse requests to come through. The sensitivity of Pulse information should be considered when deciding who and how many people should have access to Pulse.

Through our consultations, we also discovered that there is a duplication of work in approving Pulse requests. The current process means that both the SIO on the investigation, and the SIO that has access to the Pulse requests, must both approve it. We recommend reducing this to only one of the SIOs as the approver.

Strategic Decisions

The current process is that the Secretariat receives a strategic decision request, which is passed onto the Commission. The Commission revert with a "Commission Decision". Staff expressed concerns over the duplication of work, including saving the same information in a number of locations, and updating a series of different trackers on different systems. We recommend the process for recording strategic decisions is done on one system, in order to get rid of the duplication of work.

Process Recommendations

Process/Unit	Recommendations
Designation and Allocation of Investigations	<ul style="list-style-type: none">Refresh of case categorisation criteria
On Call allocations	<ul style="list-style-type: none">On call allocations done with a geographical spread of staff rather than by working team
Major Incidents	<ul style="list-style-type: none">The establishment on a Major Incident Unit within GSOC to deal with these cases.
Casework	<ul style="list-style-type: none">Training for Casework staff around admissibility, particularly with the new more complex cases coming into GSOC's remit.Refinement of the complaint form to ensure only relevant information is being received and introducing mandatory fields on the form.
Legal	<ul style="list-style-type: none">Consult with DPP about having specific state prosecutors assigned to GSOC cases.Equip more junior staff with skills for advisory services.

Processes and Systems

Process Recommendations (Continued)

Process/Unit	Recommendations
AST	<ul style="list-style-type: none">• Providing access to relevant systems prior to new joiners starting.
CMS and LMS systems	<ul style="list-style-type: none">• Procurement of new CMS and enhancement of the LMS.
Paper Files	<ul style="list-style-type: none">• Reduce unnecessary printing.
Templates	<ul style="list-style-type: none">• Develop standard report/document templates to ensure consistency in documents being developed.
Vehicles	<ul style="list-style-type: none">• Have a greater balance between staff vehicles and staff numbers in each office location.• Investigators to use their own vehicles when easier accessible than a fleet vehicle.
Pulse Requests	<ul style="list-style-type: none">• Have more staff with pulse access, including having Pulse access on mobile devices.
Strategic Decisions	<ul style="list-style-type: none">• Less duplication in storing information regarding strategic decisions.

Part 5: Future Skills and Capabilities

Future Skills and Capabilities

Introduction

In addition to providing recommendations for improving the processes and systems, we have also recommended a number of skills and competencies that we believe GSOC require in order to be effective in the future, particularly in relation to the new legislation. Throughout our review, we found a number of skills gaps that are preventing GSOC from operating as efficiently as they could be.

We recommend that GSOC should put a greater focus on more informal learning such as taking time to develop people on the job, by consulting and collaborating with others, and by creating a culture of knowledge sharing and “growth mind sets” within the organisation. GSOC should also consider holding “lessons learned” sessions after major investigations or projects to share learning opportunities with other staff.

The Grant Thornton team have also considered the future remit of the Office of the Police Ombudsman, and the future skills that will be needed, that may not currently exist in GSOC. The new legislation will have a strong impact on how the Office of the Police Ombudsman will operate, and the skills that are needed to operate effectively.

In the survey carried out by Grant Thornton with GSOC staff, there were several comments that over the last three years, some staff have requested to enroll in formal training opportunities which have not been fulfilled. It was noted that this is often due to budgetary and other restrictions that are out of management’s control. Staff therefore often rely on experienced colleagues to effectively learn on the job, which is sub-optimal since accredited training is required in certain areas.

Following on from the current state analysis of the organisation, and having considered the current skills and capabilities of GSOC, and the future demands and remit that the Office of the Police Ombudsman will be required to undertake, we have set out below the recommended skills, capabilities, and training for GSOC to consider in the future. The skills we recommend are a combination of technical and specialist skills for specific parts of the organisation, and more general soft skills that will be applicable to the majority of staff and managers.

A number of these skills can be delivered in-house by staff already in GSOC, or can be delivered by external suppliers. Some of the more specialised skills may need third level institutions to deliver these. It is noted that GSOC are currently reviewing budgetary allocations in order to procure the multi-annual accreditation programme. GSOC should consider partnering with specific organisations who offer tailored training that fits the needs of what GSOC requires.

The recommendations we have provided on the following pages covers skills such as: investigator skills, interview skills, data and information management skills, human rights knowledge, decision making skills, risk management, business planning and project management, recruitment skills, and IT skills, as well as soft skills such as communication, stakeholder engagement.

Investigations

There are a number of skills that we recommend that are specific to GSOC’s investigation staff. The nature of the investigations that GSOC are undertaking are growing more complex and diverse, and therefore they must have the specialist skills and capabilities to carry out these investigations to a high standard and in an efficient manner.

The investigations staff require a more structured training programme than that which is currently available (primarily on the job training from the senior members of their teams). We recommend that investigations staff, particularly new staff, complete accredited investigations training. This will ensure consistent levels of knowledge and competency across all investigators, and will set out common standards against which they carry their investigations. It is recognised that GSOC have sanction from DPER to procure a multi-annual accreditation programme for investigators. We regard that the proposed accredited training programme will broadly fit the needs required here.

Future Skills and Capabilities

There is also an increasing need for specialised investigation skills from the investigations staff in GSOC. We recommend that the investigations unit begin to outline potential specialists to be trained in specific areas. It should not be a requirement for all staff to be trained in each of the specific areas, but there should be a number of staff with the skills and knowledge to be able to provide insight and expertise in the areas when needed.

We recommend the below specialist areas are considered (in addition to our recommendations on hiring some of these skills). It may also be possible for GSOC to continue to use specialised organisations with these skills (via outsourcing or other procurement arrangements), however, this may result in increased wait times and lack of control over the services. It is also recognised that in some instances, such as digital forensics, major incidents and intelligence, it may not be possible to outsource specialist skills. The specialist skills required are:

- Sexual Offences and investigating sexual crimes;
- Domestic Violence;
- Investigations involving children;
- Investigations involving other vulnerable victims;
- Forensics; and
- Cyber crime.

In relation to specialist investigations involving fraud and financial crime, we recommend that GSOC considers the volume of these cases and makes a determination on the appropriateness of training staff in these skills versus procuring them in the external market.

Interviewing skills was another gap in terms of capability identified in the Investigations Unit. We found that, at the time of our review, there were insufficient GSOC employees with the correct level of interviewing skills for investigations. General interviewing skills are required for a large portion of the investigations staff, and will be required for interviewing both victims and witnesses.

In addition to general interviewing skills, there is also a skills gap in relation to interviewing particularly vulnerable victims such as children. To date, there are no serving GSOC investigators with recent or relevant specialist interview training in the Irish jurisdiction, and only one with expertise in Domestic Abuse / Child Protection investigations.

We therefore recommend that a number of staff receive training around specialised interviews with certain victims groups, including interviewing children and vulnerable victims, which both require a specific set of skills.

Forensic Extraction and Digital Data

We found that digital investigations and forensics is a current and future gap in GSOC's provision of services, which will complement the investigations work, further reducing the reliance on An Garda Síochána and other external agencies for such services.

Therefore, we recommend that GSOC develops skillsets in the area of forensic extraction and examination of digital data. This service currently procured from external parties can be extremely costly and can incur delays due to significant turnaround times from those organisations. In 2021, GSOC purchased software and licences for the forensic extraction of data for mobile phones. Along with the software, 4 staff members have been trained as operators in this space.

In one month this year, GSOC received requests to examine three computers and five mobile phones. Going forward, it can be expected that the requests for assistance in these areas will increase significantly, particularly with the introduction of Body Worn Cameras. Therefore, we see the need for these skills and we recommend increasing the number of staff members who are trained in this area, and developing a unit of staff specific to this.

Future Skills and Capabilities

We recommend that the unit's function include the development of case specific digital media forensic strategies in conjunction with the lead investigation, to include correct seizure methods, timescales and identifying routes of data acquisition. They will also be responsible for analysing and preparing reports on the evidence obtained from acquisitions. GSOC also needs to review and analyse the most cost and time efficient way of acquiring these skills to best meet its future needs.

Specialist Investigations skills

We also identified a skills gap in the investigations unit in the area of major incidents. There is currently no specialised Major Incidents Unit, meaning that when extremely serious or high profile cases come in, current investigations staff are required to work on these cases alongside their current workload. We recommend recruiting and developing a team with specialised skills who can work on these cases when they arise. The new teams we recommend creating within operations are a Specialist Services Unit, an Intelligence Unit, and a Major Incidents Unit.

If this Specialist Investigations Unit was established there would be a requirement for the development of Intelligence skills to further collect, analyse and interpret sensitive information to be used to tackle criminal activity. We therefore recommend developing a team of staff with specialised intelligence skills to improve the 'intelligence picture' through greater collaboration, communication, data analysis and connectivity with partner agencies.

Throughout our review, we found other skills gaps in the Investigations Unit. Set out below are other skills we recommend the investigations staff receive increased training in, in order to be able to carry out their role effectively and to a high standard:

- Training in crime scene examination;
- Training in collecting evidence;
- Training in taking statements; and
- Training in body-worn video evidence.

Data and Information

We also identified skills gaps in the area of data analysis. We recognise that the current CMS makes it difficult for data to easily be analysed, however, we recommend that GSOC hire more specialised staff in data analytics, research and business analysis.

GSOC will need staff who can easily extract and analyse data from the CMS or other systems, and use this data to provide insights and findings. These skills will provide GSOC with reports and information to aid them in making decisions, planning for the future, spotting trends and patterns, and making the organisation operate more efficiently.

Having live and up-to-date data significantly improves GSOC's business planning, particularly data such as numbers of cases or investigations in certain stages, in addition to locations of investigations to inform business decisions.

These specialist staff should also have the skills to be able access and retrieve information required for investigations, from Garda Síochána information sources such as Pulse requests, Gearáin (Garda Síochána information system) requests, and any other information needed during the course of investigations.

Human Rights

We also recommend GSOC upskills a portion of staff in all units (not just legal staff), in particular the Casework unit, with a broad knowledge of the domestic and criminal law, including topics such as human rights. All training delivered by GSOC should have human rights principles and practices embedded in it, and highlight the human rights implications of the work GSOC carries out. This should form the basis for any learning intervention in GSOC. It is recognised that there are currently plans underway for accredited training to be delivered to all staff on oversight, human rights, and the law.

Future Skills and Capabilities

Non-technical Skills

Through our review, we have found a number of skills gaps in non-technical areas. Some examples of the non-technical skills we recommend are below. Some of these skills are more general and a significant number of staff within GSOC would benefit from them. Others are more specific to certain roles or units.

Communication Skills

One of the key areas where we identified skills gaps is in relation to Communication. In our view, GSOC staff at all levels would benefit greatly from improved communication skills and training on effective ways to communicate with different stakeholders. The training intervention should consider both written and verbal communication, as well as communicating internally and externally, and the different things staff need to consider when communicating with both. Ensuring consistency in language and style across all communication in GSOC would be another benefit to this training.

Written communication skills should also be developed. In our view training in areas such as report writing would be important for all GSOC staff who have to prepare official documents. It was noted that this training is currently available to staff but is not often utilised, and therefore there should be an increased focus on and encouraging staff to attend this (even making it mandatory).

There should also be a focus on increasing the quality, frequency and consistency of internal communication across the organisation, which will bring increased focus on transparency and open communication.

We also identified a requirement to improve communications with complainants and victims. Any staff training should include a focus on communicating with vulnerable people, and should also incorporate skills such as empathy, and compassion whilst communicating. It will need to also cover emotional intelligence good practice in communication. This would be useful for any staff member who has to deal directly or indirectly with complainants, victims, or witnesses to any incident being investigated.

A selected cohort of staff should be trained on how to effectively deal with the media to ensure that GSOC is being shown in a positive light to the public.

Management and Leadership Development

The Learning and Development Strategy 2021-24 identifies Management and Leadership development as a key requirement. It was noted that leadership development programmes have recently been run within GSOC.

However, given the significant leadership challenges identified in the course of this review, we recommend providing detailed and specific management and leadership training across all units of the organisation. This training should not only be for senior managers, but for those with leadership roles throughout the organisation.

This training should equip managers with the skills to lead teams, support staff through the upcoming transition, help to identify learning and development needs for their staff, and support the organisation in delivering its strategic objectives.

We have also separately made recommendations in relation to the culture of GSOC and how managers and leaders can help improve this culture. These recommendations include: Leadership Alignment; Leadership structure governance and decision making, risk management, creating the skills and capabilities to lead change, and the appointment of the new senior management of the Office of the Police Ombudsman.

Business Planning

Another skill that we recommend GSOC should develop is business planning. The environment that GSOC works in is complex and uncertain, which makes it difficult to plan for. Having skills and strong expertise in business planning across all units will make it easier for GSOC to plan for and deliver future staffing and resource demands, future workloads, process changes, and future skills requirements.

Future Skills and Capabilities

Stakeholder Engagement

We recommend providing additional training to GSOC staff who engage with stakeholders regularly, on engaging with them appropriately and effectively. These stakeholders may be An Garda Síochána, complainants, the media, or the Department, or other related organisation. Having stakeholders that are positively and effectively communicated with will be a key dependency in creating a positive reputation for GSOC in the public eye.

GSOC staff who deal with external stakeholders should be equipped with the skills and capabilities to engage with these stakeholders effectively, understand the correct methods of communication, and have a good understanding of when different stakeholders need to be engaged with.

Project Management Skills

We have noted that the GSOC transformation programme will need significant resources trained in project management and with strong skills and experience in this discipline. To this end, we recommend that GSOC invests in extensive project management training for staff who will have a project or change management role in the transformation programme, as well as procuring appropriately trained and experienced staff and contractors for these key roles. We recommend having a designated transition/change senior leader whose full time responsibility is dedicated to leading the organisational transition. This key role will be vital in ensuring the success of GSOC's transition to the new organisation.

It is also recognised that there is a need for a full or part time resource for project management in the organisation, in addition to the current transformation team. This resource would lead the organisation's development of project management policy, methodology, supporting systems, training and guidance and so offer a reference point and advice to colleagues who may require this service.

Decision Making

Developing decision making capability is recommended for GSOC staff whose roles will require this skill. The training should reference the wider governance processes within GSOC and how to make that more effective. This is particularly relevant for the groups outlined below:

Roles that require training	Rationale
Managers	The current processes force managers to push decisions to more senior staff members such as DDO's or sometimes higher. Providing them with the skills and confidence to make their own decisions will allow for the decisions on processes to be made much quicker, for the senior levels to be less focused on the operational processes, and will give them more capacity to focus on more strategic work. This is particularly relevant for the managers within the investigations unit. Training will also need to be provided to managers to make them aware of appropriate levels of decision making that they should be responsible for.
Investigations	Investigators are required to make a large number of high risk and complex decisions as part of their role. Therefore, we recommend that all investigators receive decision making training.
Casework Staff	Casework currently complete admissibility decisions and would benefit from having decision making training for this process. This will be particularly relevant with the new organisation where casework staff will be receiving different types of complaints than they would have seen before
AST Staff	AST currently receive each complaint as it comes in, and update the CMS with the relevant details. When receiving the enquiry, the AST Unit perform an initial check to ensure that the enquiry does not contain information that requires immediate action, or needs specialist skills to deal with it. These staff therefore also would benefit from decision making training.

Future Skills and Capabilities

Learning and Development (L&D)

We recommend that GSOC considers having specialist L&D staff to support the delivery of the L&D strategy. These staff would be responsible for the training of specific areas in the business. For example, there should be a specialised L&D resource responsible for training the operations unit, with an understanding of the skills and capabilities needed for the role. There should also be more general L&D staff who will provide expertise on training and development to be delivered across all staff. Within the Processes and Systems section of this report (above) we have also made recommendations in relation to the enhancement of the Learning Management System (LMS).

We noted the publication of GSOC's L&D strategy (2021 to 2023) and within this we recommend that an in-depth training needs analysis should be completed across all units. This should collect insights on what skills are required to improve organisational effectiveness, and will also help to identify the key themes for training across the organisation. We recommend developing a learning culture in GSOC, where the organisation functions as a knowledge driven one, with a focus on high performing staff and quality investigations. Staff should be supported to develop and progress, and feel comfortable and confident to make mistakes and learn from them within a culture of "growth mind sets".

Knowledge sharing within the organisation is another way that the learning culture within GSOC can be enhanced. The organisation should encourage staff members to learn from one another, particularly across units and teams. This could be done through internal presentations, 'lessons learned' sessions, or the development of knowledge boards or fora within the organisation.

Risk Management

Training in the area of risk management would be beneficial to GSOC employees. Due to nature of the work carried out by GSOC, we observed an organisation which is extremely risk adverse, and GSOC has put a number of measures in place to avoid taking risks or making mistakes. A certain amount of risk can be beneficial to an organisation, and therefore we recommend training at senior levels in the organisation, including DDO levels and above. The training should include a section around strategic decision making in terms of managing risks and risk appetite.

Recruitment

We recommend that where possible, GSOC takes greater control of their own recruitment and have more involvement in the recruitment and interview process. It is recognised, however, that GSOC must operate within DPER's and PAS's rules and sanctions, including Industrial Relations agreements. We found a number of examples throughout our review where managers believe that the lack of control they have over the recruitment process has left them with staff with incorrect experience/skillsets, and lack of specialised skills. This is particularly relevant for some of the more specialised skills needed within the organisation.

The lack of control GSOC has over the recruitment process means that they cannot control the timeline over which the recruitment is done. It was noted that the time it takes to fill roles can be lengthy, which means that GSOC are often left with vacancies for significant periods of time.

We also recommend that GSOC develops a career pathway for critical roles within the organisation, particularly for roles that are difficult to recruit. This career pathway would develop staff from entry-level roles and offer a route to qualification and career progression using a specific learning pathway. A graduate or apprenticeship programme would support in the recruitment of these roles at the junior levels, and a progression pathway would need to be developed including on the job training, specific skills training including accredited courses and qualifications, and ongoing mentoring/feedback/development interventions from line managers.

Teams and units within the organisation structure should facilitate assignment of people to progressively more complex and specialised work in order to allow staff development opportunities which are not necessarily aligned to promotional opportunities. For example, new and less experienced investigators who are initially assigned to more routine cases, then should be allowed the opportunity to progress to major case teams, or to develop specific skills and competencies over time. We also recommend that GSOC focus on improved workforce and succession planning to ensure roles can be recruited for in a timely manner and that individual development needs are better met.

Future Skills and Capabilities

IT

In relation to the IT systems in operation, these were described by management and staff as being “not fit for purpose”, in particular the Case Management System (CMS) and the ORION system. The CMS is described as a slow, onerous system, which delays the ability to complete tasks in a timely, efficient manner. Comments were also made in terms of the functionality of that CMS system, and the suggested implementation of software programmes that can do specific tasks digitally that are currently undertaken manually, which is time consuming. We recommend that GSOC procures a new, fit for purpose CMS system with the necessary functionality included.

We also identified opportunities to transform the learning experience of staff within GSOC through the increased utilisation of the current LMS system, OneLearning.

In both of these areas we recommend that GSOC makes a significant investment in technology, both procurement of new technology (a CMS), in development of the existing systems (the LMS), but also the skills to support and maximise the potential these systems in order to help transform the operational effectiveness of the organisation.

Policy Development

We recommend that there is a need for staff who have responsibility for policy development and management at a corporate level to support and inform corporate decision-making, strategic and business planning and engagement with stakeholders including in relation to trends, new legislation and other emerging issues. There is a need to develop or acquire these skills.

Separately, in relation to the policy library, there is a requirement to ensure that it is up-to-date, relevant, accessible and reflective of all legislative changes that are anticipated by the Office of the Police Ombudsman. It is vital that the entire policy library requires review in order to reflect the legislative changes. In the structure of the new organisation it is suggested that this role fits with the Quality Management Unit under a remit to set operational standards.

Estates

Currently, GSOC have 3 locations from which they operate. An office in Dublin City Centre, an office in Cork and an office in Longford. Corporate Services and Administration functions are entirely based in Dublin. Dublin also houses a number of investigations teams each led by an SIO, this includes the Protected Disclosures Unit. Within the Cork and Longford offices, there is one investigations team each led by an SIO. There is a notable absence of GSOC presence on the ground in the North, and West of Ireland. This impacts the ability of GSOC personnel to attend scenes in these areas promptly. It is also important to reflect that currently, On Call teams are not location-linked therefore it is possible that, for example, an On Call team based out of the Cork office may have to travel to a scene in Donegal.

When we met with other Police Oversight Bodies as part of our benchmarking review, they shared varying Estates strategies (covered in more detail in the benchmarking section of this report). These ranged from having their own regional offices scattered throughout their jurisdiction, working from regional police headquarters, and working from one larger head office location.

Currently, of the three GSOC office locations, Cork is the only location which has space for growth in headcount. Therefore, if, as is recommended in this report, GSOC increases headcount significantly, then they will need to increase their estates footprint both in Dublin and within other locations. Increasing the geographical footprint through the creation of regional offices (spoke and hub model) would help GSOC from both the perspective of operational effectiveness and attending scenes promptly, but also it would increase the talent pool from which they can recruit, and would enable them to achieve the required growth more quickly and easily.

Future Skills and Capabilities

Since an Estates review does not fall within the scope of this project, **we recommend that GSOC reviews its Estates strategy in the light of the options, set out above**, such as GSOC having their own regional offices scattered throughout the country using the spoke and hub model. Other options which should be considered include working in shared locations with other public bodies, or working from one larger head office location.

Skills and Capability – comparison with best practice in other Oversight Bodies

We discussed training and development with all of the external benchmark organisations we met with. Each of the organisations said that they work with a mix of trainee investigators and experienced hires in the investigations space providing specialist training where case volume called for it. In relation to trainee investigators, a number of the organisations we met with highlighted that they had a form of ‘trainee scheme’ or ‘graduate programme’ whereby trainee investigators embark on on-the-job shadowing and training with view to becoming a fully fledged investigator within two years. We recommend that GSOC consider this for the recruitment and development of its investigations staff.

We see that this is significant opportunity for GSOC, particularly in the context of a very significant resource increase and the challenges involved in hiring this volume of new staff (see Part 11 below). We also identified that a number of these comparator organisations also run ongoing recruitment campaigns for both experienced investigators, as well as people with the specialist investigatory skills set out above. Again we recommend that GSOC should initiate this process within the overall resourcing strategy.

Summary

In this section, we have provided a series of skills that we believe will support GSOC in its future changes and will provide GSOC with the capability to operate effectively. The skills that we have recommended are:

Skills and Capabilities Development Areas
Investigator Skills: <ul style="list-style-type: none"> • Interviewing • Forensic Extraction and Examination • Major Incidents • Intelligence
Data Analysis
Human Rights Expertise
Non-technical Skills: <ul style="list-style-type: none"> • Communication and Public Affairs • Management and Leadership Development • Decision Making • Project Management • Business Planning • Stakeholder Engagement • Learning and Development • Risk Management
Recruitment
IT
Policy Development
Learning Needs Analysis to collect insights on key skills requirements in order to support the delivery of the learning strategy

Part 6: Benchmarking

Benchmarking Approach

Introduction

The benchmarking process is an important stage within the wider organisational review process; and aims to identify best practice within organisations that are similar in nature to GSOC. This is to ensure that we can draw appropriate comparators to inform future organisational design recommendations.

Our Approach

Our approach to the benchmarking process involved structured workshop sessions with representatives from other police oversight organisations within the UK and internationally, as well as regulatory bodies in Ireland. Within each interview, we asked questions regarding a number of key themes relevant to our review:

- **Remit and Strategy:** We asked organisations to describe their overall remit and purpose, who their main service users were, and their governance and strategy development processes;
- **Systems and Processes:** Comparator organisations were asked to provide information regarding their systems and processes, and we reviewed the role of technology within the organisation;
- **Operations:** Organisations were asked to provide an overview of their organisational structure, a view of their overall efficiency, and information regarding staff workloads;
- **Staff Grades:** Organisations provided information regarding the nature of their staff grading structure, and their views on the appropriateness and effectiveness of same;
- **Investigations:** Information was sought regarding investigation procedures, cases per investigator and service level agreements with parent departments, the public and other stakeholders;
- **Training Practices:** Organisations discussed their approach to training and developing their people, covering specialist investigatory skills and wider organisational training provisions; and
- **Resourcing:** Organisations discussed their approach to hiring and developing talent throughout the investigations disciplines.

Alongside our interviews, we also received and reviewed additional documentation and other information from these organisations that expanded on our findings from the interview process.

Benchmarked Organisations

Our benchmarking process sought out comparator organisations in Ireland and the UK, and focused on 12 organisations that all either work within the police oversight environment, or within other ombudsman contexts within Ireland, the UK and internationally. These are:

- **Office of the Police Ombudsman for Northern Ireland:** The Police Oversight Body based in Northern Ireland;
- **Independent Office for Police Conduct:** The Police Oversight Body for England and Wales;
- **Police Investigations and Review Commissioner:** The Police Oversight Body for Scotland;
- **Independent Police Conduct Authority, New Zealand:** The Police Oversight Body for New Zealand;
- **Office of Public Integrity, South Australia:** The Public Administration and Police Oversight Body in South Australia; and
- **Regulatory and Oversight Bodies:** A number of other regulatory and oversight bodies based in Ireland including The Office of the Ombudsman, The Children's Ombudsman, Data Protection Commissioner, Competition and Consumer Protection Commission, Health and Safety Authority, Revenue Commissioners and Department for Social Protection.

Benchmarking Conclusion

Implications of Benchmarking for GSOC

The outcome of our benchmarking process demonstrated that within the oversight, regulatory and ombudsman communities of practice, there are a vast range of remits under which these organisations operate. However, our work identified some key learnings which can be taken from each body in relation to how it achieves its outcomes and services the citizen.

Caseload per Investigator

Our benchmarking found that organisations that have a similar remit to GSOC had a much lower case per investigator. In relation to specific numbers, we found that the structure and remit of the organisations were not similar enough to that of GSOC to suggest a specific caseload per head to aim for the organisation. However, our conversations with employees and management reflected that the current caseload per investigator in GSOC is "very demanding and unrealistic". Therefore, based on this and the much lower case-per-person benchmarking figures, we recommend that GSOC works to reduce the caseload per investigator until it reaches sustainable levels for the organisation. Based on benchmarking figures and current capacity within GSOC, we recommend the organisation should sustain rolling 10 cases per investigator.

Key Performance Indicators

Organisations shared with us that they maintain Key Performance Indicators to track the progress of their casework and investigations. These Key Performance Indicators were largely focused on time, with PIRC sharing that they aim to complete 80% of serious cases within 3 months. Their current achieved performance in this area is 79%. Interestingly, they shared that they 'pause the clock' on this time when they are awaiting response from Police Scotland which allows them to avoid having their KPIs falling victim to slow engagement from external stakeholders. Our benchmarking also reflected that whilst time-bound KPIs ensure that the citizen receives a timely and efficient service, it was reported to us that they can drive unhealthy behaviours in relation to rushing case closures and 'cutting corners' therefore it is important to mitigate this type of behaviour when introducing such KPIs. This work should be carried out within the newly recommended Policy Research and Analysis Unit.

Digital Maturity

Each of the organisations we spoke to had varying levels of Digital Maturity. However, those with an increasing caseload reflected that although the implementation of new technology makes casework more efficient, it is difficult to quantify this in the context of case numbers which are rising anyway. As a result of this, we expect that a new Case Management System will allow the Office of the Police Ombudsman to ensure that investigations are carried out in an efficient way and that employees can increase the value-add of the work they are producing. We have accounted for time savings as a result of new technology in our workforce plan. For example, it is expected that an up to date and sophisticated CMS will allow the organisation to monitor and optimise the use of KPIs to ensure time is spent improving and maximising efficiencies in priority areas.

Relationship with Local Police

Each of the organisations we spoke to reflected the importance of maintaining a productive, professional relationship with the local police force. As a result of this we recommend that the Office of the Police Ombudsman capitalise on feedback from An Garda Síochána that the relationship is moving in a positive direction and continue to make strides in this area whilst protecting the integrity of their police oversight role. We recommend that the organisation reflect on points of potential improvement yielded from our external stakeholder engagement process to continue to progress in this area.

Policing Background Requirement for Investigators

In relation to the question of whether Investigating Officers benefit from a policing background, our benchmarking reflected that while ex-police officers bring extremely useful skills and experience to the organisation, at times they **can** carry views which aren't always consistent with the objective of achieving civilian oversight of policing.

Therefore, it is recommended that the Office of the Police Ombudsman nurtures a workforce made up both of those who have a policing background and those who do not. In this vein, it will be important that the organisation has a training programme to ensure a consistent approach to investigations reflective of Office of the Police Ombudsman policies and procedures rather than ways of working inherited from an earlier career experience.

Benchmarking Conclusion

On Call System

Each of the organisations in the UK and Ireland operate a 24/7 On Call system. They shared that at all times there will be an investigating team on hand to deal with call outs however the composition of this team varies from organisation to organisation. For example, in the Office of the Police Ombudsman in Northern Ireland, they shared that they have an SIO, Deputy SIO and 6 IOs involved, whereas in the Police Independent Review Commissioner in Scotland, the SIO will only be contacted by Police Scotland in extenuating circumstances. As a result of our benchmarking process we have made recommendations for an on call model for the future state Office of the Police Ombudsman.

This model, though taking into account the benchmarking findings, was reached following extensive consultation with Senior Leadership within GSOC, and a review of the new legislation, specifically in reference to the protection the draft Bill affords to existing terms and conditions of employment.

Geographical Footprint

In relation to the geographical footprint of the organisations we benchmarked, with the exception of IOPC, each of the other organisations have a Head Office acting as a base location with Investigating Officers travelling around the country to conduct investigations. Largely, employees use their own vehicles and claim expenses in retrospect.

Body Worn Video

In relation to body worn video cameras, we discussed with the comparable organisations their impact on complaint numbers. When we spoke to the Office of the Police Ombudsman in Northern Ireland, they reflected that although the introduction of body worn video cameras triggered an initial drop in complaints numbers, the complaints numbers began to rise again six months later and have continued to rise since.

The Police Independent Review Commissioner in Scotland highlighted that although body worn video is currently only worn by armed officers, they expect an imminent roll-out across all officers and they expect this will predicate a decrease in complaint numbers. The Independent Office of Police Conduct in England and Wales shared that although they have not collected research on the subject, anecdotally they believe that where body worn video is switched on, this influences behaviour and can discourage members of the public from unacceptable behaviour or actions as they know they are being filmed.

In relation to admissibility, the Independent Office of Police Conduct shared that they do not believe body worn video impacts admissibility and that they encourage officers to decide on admissibility based on the referral form only.

In summary, although not every organisation had an identical remit to GSOC, there are many observations and insights which follow from this benchmarking exercise, that inform our recommendations. We have included a full summary of each of the organisations we met with, as well as a summary of our key benchmarking findings within the relevant appendix.

Part 7: Journey of a Complaint

Journey of a Complaint

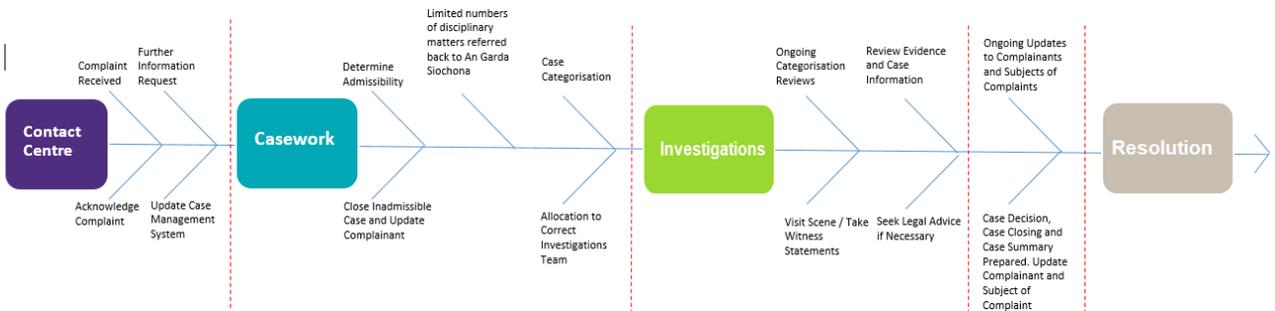
Journey of a Complaint

As per the Design Principles set out above for the organisation, Office of the Police Ombudsman will seek to put people at the forefront of all that they do, providing a quality service that meets the needs of all stakeholders and upholds their human rights. To this end, it is important to clearly outline the journey of the complaint and core deliverables at each stage of the complaint journey.

Through our benchmarking work we identified that organisations which have a clear complaint journey, prioritising the citizen at each stage, achieve their Key Performance Indicators and largely meet targets important to their core stakeholders. Through our discussions with comparable organisations, we concluded that processes which are clearly set out with process owners, increase the likelihood of success in this area. For example, within the Police Ombudsman Northern Ireland (PONI), we were told that the introduction of a triage unit, determining admissibility and directing cases to the relevant investigations teams made the process more efficient and seamless.

Likewise, through our discussions with Office of Public Integrity (OPI), South Australia, we learned that their process includes three key teams owning a stage in the process each; Complaints Team, Assessments Team and Investigation Specialists Team. The Complaints Team receive complaints in the first instance similarly to the Contact Centre we are suggesting as part of the Office of the Police Ombudsman structure (see below). The Assessments Team determines admissibility and triages complaints (like the work we propose for the Casework team set out below), and the Investigation Specialists Team oversee investigations as they are carried out by the South Australian Police.

Below we have summarised what we see will be the key stages in the journey of a complaint within Office of the Police Ombudsman. Within each of the stages we propose to have a Deputy Director of Operations responsible for overseeing the deliverables required, except for the Investigations stage where we propose 2 Deputy Directors, one with responsibility for overseeing the Investigations process and the other with oversight responsibilities for the admissibility and categorisation decisions on cases. In addition to the below journey, we also propose a Deputy Director of Investigations responsible for Intelligence and Data Analysis relevant to the Complaint Journey:



Contact Centre

We recommend that the Contact Centre is the first point of contact for complainants through telephone, in-person or via email. We recommend that this function be carried out by the current AST team in addition to their responsibilities of providing administrative support to operations. At this stage of the process we recommend that the complaint handler logs the complaint into the Case Management System and confirms to the complainant that the complaint has been received. We also suggest that team members at this stage carry out further information requests before passing the case onto the Casework Team for triage. The Contact Centre will also conduct an initial screening for risks within the complaint. This must be an immediate action once contact is made. In relation to the current AST, we recommend that those who provide clerical support to investigations are deployed to investigations teams in addition to doing their general tasks, due to the close working relationships in these teams.

Casework

The main process of the Casework Team will be to triage the complaint. This will involve a number of steps beginning with determining if the case is admissible. If the case is inadmissible, the team member should inform the complainant and close the case.

Journey of a Complaint

If the case is admissible, the team member should determine if the complaint is suitable for resolution by AGS. If so, they should return the case and confirm receipt with the relevant contact within AGS. The admissibility review process will sit in the Quality Management and Outcome Review Unit within Corporate Affairs, where the team will review any appeals received from complainants.

Where a case is being retained by the Office of the Police Ombudsman, a senior member of the Casework Team should then determine categorisation of the case before passing back to the team to assign to the correct Investigations Unit.

Through our benchmarking exercise, we discovered that in other Police Oversight Bodies, categorisation decisions are typically made at a senior level and reviewed continuously throughout the life cycle of the case. For this reason, we have recommended a continuous review process as part of the investigation step.

Investigations

Investigations teams should take the case and begin investigative work, keeping the complainant and complaint subject updated throughout the process. Through our benchmarking work we discovered that PONI update complainants on the status of their case a least every six weeks. We recommend that GSOC also commit to a clear and structured communication process both with the Complainant and Complaint Subject in order to adhere fully to the Design Principles as set out. Investigators should seek legal advice at appropriate times throughout the lifespan of the case as well as introducing the case to the correct levels of approval before drawing a conclusion and updating the complainant and subject.

At the end of the case, we recommend that the case holder creates a summary of the case which they will then forward to Communications to use (if required) for public relations purposes. This process is supported by our benchmarking which suggests that best practice is that the case holder within the Operations Department is most familiar with the case, and therefore best placed to produce a routine, accurate and informed case summary.

Resolution

At this stage the case is closed and the Communications team should have received the case summary which they can use for PR purposes.

Information

Data Analysis and Intelligence on case frequency, geographical concentration and officer history will happen around the journey of a complaint and will inform decisions made around communications, future investigations and training for GSOC.

Part 8: Proposed Workforce Plan

Workforce Plan

Introduction

Following the completion of the 'As-Is' phase of this Workforce Planning exercise, Grant Thornton have created a future state or 'To-Be' organisation size and structure. As part of this work, we conducted benchmarking with organisations globally which are comparable to GSOC. In addition to this, we held workshops with the Commissioners, Directors and Senior Leadership Team at GSOC through which we agreed a set of Design Principles for the organisation as well as beginning the discussion surrounding necessary resources both to sustain operations and to achieve future strategic objectives.

It is important to note that when creating this workforce plan, we have used the assumption that the Office of the Police Ombudsman will largely be unable to draw on the expertise and mutual aid of other law enforcement agencies in the way that the Police Ombudsman of Northern Ireland, the Independent Office of Police Conduct and the Police Independent Review Commissioner can, and as a result the resourcing model has been enhanced to reflect this. Many law enforcement agencies have recently ceased to supply services to the Office of the Police Ombudsman.

Based on our in depth review of the current state of processes, systems, people, culture and leadership within GSOC, we have created a proposed workforce plan for the future Office of Police Ombudsman which includes an increase of headcount between **180 to 239**. This would increase GSOC headcount from 169 FTE to **346 - 405 FTE (including current vacancies)**.

We have provided three options for the workforce plan with option 1 (base case) based on a figure of 2,300 complaints per annum. This number is an estimate of the current complaints plus the estimated additional complaints that will be received and is based on a projection of the 2022 complaint numbers. The recommendations in headcount have been based on this figure of 2,300 complaints as this is the best estimate of the amount of complaints that the organisation will receive in 2023. However, given that we have been unable to secure accurate data on complaint numbers (particularly from AGS), we have also included optional staffing models based on the Office of the Police Ombudsman receiving an additional 250 complaints per annum (Option 2) and a further 500 complaints per annum (total 2,800) (Option 3).

The plan includes significant extra resources within both the Operations (**+137 – 191FTE**) and Corporate Affairs Functions (**+43 – 48 FTE**) alongside **3 FTE** in the senior leadership structure (although these are direct replacements for the existing Commissioners). The breakdown of grades of these new roles under the three options set out in this report are as follows:

Grade	Option 1 FTE Increase	Option 2 Increase	Option 3 increase
Principal Officer	6 FTE	6 FTE	6 FTE
Assistant Principal	23 FTE	27 FTE	31 FTE
Higher Executive Officer	88 FTE	102 FTE	116 FTE
Executive Officer	45 FTE	52 FTE	63 FTE
Clerical Officer	18 FTE	21 FTE	23 FTE
Total	180 FTE	209 FTE	239 FTE

Workforce Plan

GSOC Current Workforce

The table on the following page represents the GSOC workforce based on the staff report as of 7th June 2022. It includes all roles which have been sanctioned as well as indicating which ones are filled and which are vacant. Furthermore, it breaks down the roles into their business area, department and grade within the grading structure of the organisation. Later in this report we will provide a draft proposed future state of the additional resources we believe are necessary to create the future operating model for GSOC.

	Grade	Administration												Operations								Total	
		Commissioners Administration Director and Deputy Directors	Legal Unit	Communications Unit	Library Unit	Corporate Services	HR/Training	IT	Policy Unit	Secretariat	Quality Assurance and Review	Data and Governance	Transition	Investigations Director and Deputy Directors	Investigations Division	Case Officers - AST	Case Officers - Admissibility	Case Officers - Child Protection	Case Officers - Section 94	Protected Disclosure Unit	Intelligence Analyst Unit		
December 2022 Workforce	Secretary General	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
	Assistant Secretary	2	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	3
	Director (PO Higher plus Director Allowance)	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
	Principal Officer	0	2	1	0	0	0	0	0	0	0	0	0	3	0	0	0	0	0	0	0	0	6
	Assistant Principal	0	0	2	1	0	1	1	1	2	0	1	1	1.7	0	8	1	1	0	1	1	0	23.7
	Higher Executive Officer	0	0	0	2	0	1	2	1	0	0	0	0	1	0	33	1	6	1	1	7	3	59
	Executive Officer	0	0	2	1	0	3	2	1	0	1	0	4	0	0	10	1		1	10	1	0	37
	Clerical Officer	0	0	2	0	0	2	2	1	0	1	0	1	0	0	0	9	0	0	0	0	0	18
	SVO	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1
	Total FTE	3	3	7	4	0	7	7	4	2	3	1	6	2.7	4	51	12	7	2	12	9	3	149.7
	Total FTE	3	46.7												100								149.7
	Variance	0	-1												-0.95								-1.95
	Current Vacancies	0	0	3	0	0	1	0	3	0	1	2	2	0	0	4	1	0	0	0	2	0	19
	Total Staff Including Vacancies	3	3	10	4	0	8	7	7	2	4	3	8	2.7	4	55	13	7	2	12	11	3	168.7

Workforce Plan

Resource Gaps Identified and Recommendations

Based upon our detailed analysis set out in the report above, we have identified the following areas of GSOC where we recommend enhanced resourcing levels in order to right-size the organisation and allow GSOC to effectively deliver its future strategic priorities and statutory obligations.

Leadership Structure

- The revised legislation and Bill is enforcing a revised leadership structure within Office of the Police Ombudsman, to include an Ombudsman, Deputy Ombudsman and CEO (**FTE 3**). We recommend that GSOC place an emphasis on the role of leadership in leading change to transform the current organisation. In particular, we recommend appointing a strong and experienced CEO with experience of organisational transformation as soon as possible. The CEO should have responsibility for the delivery of effective change leadership, including extensive culture and leadership change. As such, they will be responsible for leading the Office of the Police Ombudsman through change whilst breaking down the existing silos and ways of working, and improving and leading the desired shift in culture. The CEO should also drive and have accountability for business planning and strategy. The appointment of an experienced CEO will ensure adequate oversight of risk management during the transition phase as well as continuity of business to ensure an uninterrupted service for the citizen.
- We recommend the grading of the Ombudsman to be at Secretary General level in order to attract suitably qualified candidates to the role and as a result of the volume of work they will be required to oversee and provide direction on. We recommend the grading of the Deputy Ombudsman to be at Deputy Secretary General level for the same reasoning, in order to attract a suitably qualified candidate.
- We recommend that the CEO is graded at Assistant Secretary level. This aligns to the design principles set out in this report in coordination with the Commissioners surrounding the development of a clear leadership structure, which allows for the facilitation and alignment of objectives and delivery of the long term vision and strategy of Office of the Police Ombudsman.
- It is also noted that within the Leadership Structure of GSOC there are currently 2 Directors responsible for the Administration and Operations Directorates. The roles are graded at Principal Officer with Allowance, and Assistant Secretary (5 years FTC) respectively. The Director of Operations post holder sits at Assistant Secretary (he was appointed on a 5 year FTC and on the basis of a “holds what he has” in relation to his previous Civil Service grade and this is “ringfenced” for the duration of his appointment). However, going forward we recommend that both the Director of Corporate Affairs and Director of Operations roles are permanent and are graded at Principal Officer with Allowance.

Recommended Allocation of Headcount for Leadership Roles (replacing existing Commissioners)

Role	Grade	Quantity
Ombudsman	Secretary General	1 FTE
Deputy Ombudsman	Deputy Secretary General	1 FTE
CEO	Assistant Secretary	1 FTE
Total		3 FTE

Workforce Plan

Corporate Affairs

Director and Principal Officer level roles in Corporate Affairs

- We do not recommend any increase in headcount or change to the structure for the Heads of Corporate Affairs and Operations.

Legal Unit

- We found that the legal unit is operating under significant pressure, with a lengthy backlog. The timeframe of the backlog has been described as reaching from 12 to 24 months. Management within the organisation have highlighted that this backlog was initially due to a vacancy in the unit and that while there is still a significant rolling backlog, it has reduced.
- In addition to the backlog, it was reported that advisory queries and requests have increased by a factor of seven in the period from 2017 and 2022, in line with an increase in volume of Non-Party Disclosure requests by 147% from the period of 2020 to 2021 (in the context of civil litigation this refers to the disclosure of documents from a third party who is not involved in the proceedings).
- We recommend that the Legal Unit streamline processes in addition to increasing headcount in order to improve efficiencies and timeliness of providing legal advice. We have considered efficiencies in headcount enhancements in our workforce plan recommendations.
- As a result, our review found that there is a shortfall in the Legal Unit. We note that there are currently 2 vacancies at AP level. Currently this unit can be regarded as a bottleneck which impacts upon the progress of investigations. In order to properly mitigate this operational risk we recommend an increase in **2 FTE** (1 AP and 1 HEO) to deal with the current backlog, and the increased demands of the unit post transition. In addition to the increase in in-house legal headcount, we recommend establishing a relationship with outsourced legal panels or counsel that can provide legal advice on an as-needs basis. This will allow Office of the Police Ombudsman to deal with the fluctuations in demand, and afford them with an element of flexibility.
- In 2021, GSOC received 2,189 complaints of which 1,332 were deemed admissible. This constitutes an admissibility rate of 61%.
- Going forward, due to the increase in remit within the Office of the Police Ombudsman through the addition of elements such as supervised investigations and investigating incidents of concern as well as other additional responsibilities, it is likely that admissibility will increase to approximately 65%. We estimate the organisation will receive approximately 2,300 complaints annually of which approximately 1,495 will be admissible.
- Although it is noted that not every case requires legal advice, certain cases will require more specific and lengthy legal review. Each legal staff works on average approximately 200 days per year (this number is lower than other staff due to their requirements to attend court and boards of enquiry, and for NPD). It is our estimation that they each spend approximately 1 day per admissible case per year
- We have provided the following options based on the estimate of admissible complaints in 2023 with the outer horizon of admissible complaints at 1,903.
 - Option 1: In order to successfully staff the Legal Unit to deal with **1,495 admissible complaints** per year we recommend 7 employees, currently staffed within the Legal Unit, focus on this.
 - Option 2: Given that one staff member can complete 200 cases per year, in the event that there are **250 additional admissible (above the 200 limit)** complaints, amounting to a total of 1,745 admissible complaints, the legal unit will need an additional **2 FTE** staff member within this unit.
 - Option 3: Given that one staff member can complete 200 cases per year, in the event that there are a **further additional 250 admissible complaints (above the 200 limit)**, totalling to 1,995 admissible cases, the Legal Unit will require an additional **3 FTE** on top of the 2 FTE recommended for option 2.
- Taking into account the benchmarking research and best practice, we recommend a change of reporting line in the future structure and that the Legal Unit reports directly to the CEO in the revised structure. This is to protect the independence of the unit since they are responsible for providing quasi-independent legal advice. Additionally, the CEO position will have statutory responsibility for staff, ensuring oversight over the legal unit functions.

Workforce Plan

Recommended Increase in Headcount for Legal Unit						
Role	Grade	Current Quantity	FTE for Backlog	Option 1	Option 2	Option 3
Head of Legal	PO	1 FTE	0 FTE	0 FTE	0 FTE	0 FTE
Senior Legal Advisors	AP	2 FTE	1 FTE	0 FTE	0 FTE	1 FTE
Senior Legal Executives	HEO	0 FTE	1 FTE	0 FTE	2 FTE	2 FTE
Legal Executives	EO	2 FTE	0 FTE	0 FTE	0 FTE	0 FTE
Clerical Officers	CO	2 FTE	0 FTE	0 FTE	0 FTE	0 FTE
Increase in Legal Unit		7 FTE	2 FTE	0 FTE	2 FTE	3 FTE

Communications Unit

- We found that the Communications Unit will be significantly impacted as a result of the legislation, to include a full rebranding of GSOC's corporate identity and website, the development of an extensive suite of public information materials and engagement campaigns, and the requirement for a pro-active communications and outreach strategy. Additional responsibilities of the Communications Unit will remain to focus on internal communication initiatives such as the communications day and Oversight Magazine. With the implementation of the new legislation, communications will need to be more proactive, helping to raise the public profile of GSOC. This includes improving public understanding of the role and functions of the Ombudsman and promoting public confidence in processes for resolving complaints.
- It is our view that GSOC needs to reform its relationship with the media, external stakeholders and the public. In order to educate the public on GSOC's remit to build public confidence around policing in the Republic of Ireland. We recommend that GSOC should utilise positive communications and take advantage of the media opportunities around high-profile cases.
- We also noted that a specialist Public Affairs capability is a current gap in the organisation, and this will only increase with GSOC's new remit. This should reside in the communications unit and will be responsible for government relations, media communications, issue management, corporate and social responsibility, information dissemination and strategic communications advice.
- Additionally, we found a consistent theme that internal communications need to be improved within GSOC.
- We recommend for the Communications Unit to report directly to the CEO. We believe that this is the correct reporting line as the Ombudsman will be the face of Office of the Police Ombudsman and it is important to ensure proximity between the Ombudsman and the Communications Unit in this critical time of brand building and definition of core messaging.
- Therefore, we recommend an increase in **4 FTE (1 HEO and 3 EO's)** to respond to the above demands and for the team to scale in line with the organisational increase in headcount.
- We recommend each of the HEO's (current and future) within the communications unit focus on a specific communications pillar within the Office of the Police Ombudsman. This will allow for 1 HEO to oversee branding, 1 HEO to oversee internal communications and 1 HEO to oversee case summaries and external relationships. The AP remaining within the Unit will be responsible for complete oversight of all pillars to ensure cohesive messaging and brand consistency. Furthermore, we recommend that each of the EO's provide administrative support to each of the pillars, with 2 EO's focussing on the third pillar of case summaries and external relationships. Although the workload of this unit will increase significantly, through economies of scale we believe the new headcount will sustain all of the targeted outputs of the unit.
- Total headcount will equate to 8 FTE, of which will be working 220 working days per year, totalling to a total of 1,760 working days per year within the unit. Breakdown of working days per year per pillar are provided on the following page.
 - Pillar one (Branding): 1 HEO and 1 EO, equating to 440 working days per year (2 x 220). Once demand lessens within this pillar after the initial period of the transition, we recommend that the 2 FTE assist with the following pillars.

Workforce Plan

- Pillar two (Internal Communications): 1 HEO and 1 EO, equating to 440 working days per year to focus on the responsibilities within this unit (2 x 220)
- Pillar three (Case Summaries and External Relationships): 1 HEO and 2 EO's, equating to 660 working days per year to focus on the additional responsibilities and remit with regards to providing case summaries and improving the Office of the Police Ombudsman's relationship with external bodies (3 x 220)
- Additionally, HEO's will be responsible for increased managerial duties and responsibilities of the current Head of Communications and Communications Manager to deal with an expanded team and remit. The increase of 4 FTE will allow the Office of the Police Ombudsman to align to the design principle set out in this report surrounding the promotion of public accountability of policing through transparent communications and effective engagement with external stakeholders.
- We have not provided Options 2 and 3 resourcing for the Communications Unit as we believe that the recommended increase of 4 FTE will be sufficient in the case of any additional complaints in the range of 250-500.

Recommended Increase in Headcount for Communications

Role	Grade	Quantity
Communications Manager	HEO	1 FTE
Communications, and Public Affairs Officers	EO	3 FTE
Total		4 FTE

Corporate Services and Finance

- Our review found that the Corporate Services and Finance function will be significantly impacted by the new legislation. In particular, from the finance perspective, the establishment of a Vote and the decoupling from the Department of Justice will result in the transition to a Vote Accounting System going forward. As a result, there will be more independent financial management required within GSOC. For example, through our discussion with Corporate Services we learned that although GSOC currently manage their own budget, there will be an increased financial management requirement for the organisation as well as payroll responsibilities.
- We note that there is one AP in Corporate Services, who currently has responsibility for both Corporate Services and Finance. Additional resources currently on the team include one HEO, two EO's and one CO. As such, we do not recommend an increase in headcount for the wider Corporate Services Unit. However, currently, the Finance Unit has an FTE of 2, which in our view is not sustainable given the revised organisation's new remit, the establishment of the vote system and the management of this independent vote.
- As such, we recommend that the Corporate Services and Finance Unit splits into two separate Units. We recommend that the dedicated Finance Unit consist of a Head of Finance at AP level, who will oversee the unit and assume ultimate accountability for its outputs. This role should be graded at Assistant Principal level given the complexity of the work and the risk involved. This individual will lead, guide and provide direction to the team. We also recommend that there be a Finance Manager who will be responsible for managing and collating financial information for submission by the head of Finance. In support of these two roles, we recommend the organisation hires 3 Finance Administrators who will be responsible for day-to-day compilation and management of financial information within GSOC. This will account for a total increase of **5 FTE** within the Finance Unit.
- We have not provided further resourcing options for the Corporate Services or Finance Units as the recommended increase in headcount will suffice in terms of any additional complaints in the range of 250-500.
- We recommend that the new AP within the Finance Unit has an appropriate accounting qualification and sufficient vote accounting experience as this is a significant change in process and remit for the reformed body.

Workforce Plan

Recommended Increase in Headcount for Finance		
Role	Grade	Quantity
Head of Finance	AP	1 FTE
Finance Manager	HEO	1 FTE
Finance Administrator	EO	2 FTE
Finance Administrator	CO	1 FTE
Total		5 FTE

HR/Training

- Our review found that there is a shortfall within the HR Unit in that there is insufficient dedicated learning and development staff. In our view there is a requirement to employ a team of learning and development professionals who can complete training needs analysis, source training suppliers, develop training plans and develop a system for allocating training resources, whilst the HR unit will be responsible for overseeing all HR functions including staff complaints and compliments.
- Additionally, GSOC has a comprehensive Learning and Development Strategy that needs to be resourced properly in order to work effectively. As such, it is our view that the L&D Function should be a standalone unit. Employing learning and development professionals will transform the training offering provided to GSOC from a reactionary service to a proactive, intentional approach to training and developing staff in the wider organisation. Furthermore, it will enable GSOC to achieve its objectives efficiently.
- As such, we have provided the below recommendations:
 - Establishing a dedicated Learning and Development Unit. We recommend an increase in **3 FTE** to focus solely on learning and development within GSOC. We recommend that one employee is a dedicated in-house technical training specialist with previous investigative experience. This will allow for an enhanced focus on training, inducting and upskilling new staff as the organisation expands. As such, we are recommending that the extra roles are graded at Assistant Principal and Higher Executive Officer Level due to the establishment of the unit and complexity of the work to embed this function into GSOC's structure. Additionally, this will allow for the Office of the Police Ombudsman to deal with the expansion of the future organisation's headcount effectively in order to meet the learning and development needs of the future workforce.
 - Proper utilisation of the current Learning Management System (LMS) and the associated functions (OneLearning), which is a type of software to create, manage and share learning content, with a function to analyse the effectiveness and impact of the training. However, it is our view that the LMS will require an additional **1 FTE**, which we recommend at CO grade to support with the administrative workload, although the resource could be used across the Unit.
 - An increase of **4 FTE** for Recruitment. They will be responsible for recruitment on an ongoing basis, and for setting up, administering, managing and maintaining the recruitment system. Additional responsibilities include the preparation of information booklets and job descriptions and working in coordination with PAS to ensure efficient recruitment process and also the onboarding of staff. We recommend that these roles are graded at EO level to ensure sufficient experience and accountability within the role. We recommend 1 FTE be placed at HEO level as a recruitment team lead, 2 FTE at EO level as recruitment specialists and 1 FTE at CO level to provide support to the team.
- The recommended increase of 4 FTE in total in the area of learning and development and the establishment of a dedicated learning and development unit is vital for allowing GSOC to fulfil the design principle set out in coordination with the Commissioners surrounding the embedding a learning culture, resulting in a culture with a focus on continuous improvement and staff development.
- We have not provided Options 2 and 3 resourcing for this team as we believe that the recommended increase will be sufficient in the case of any additional complaints in the range of 250-500. However, we recommend that this unit be reviewed on a regular basis in terms of the additional headcount, and the needs associated with this in terms of learning and development and recruitment.

Workforce Plan

Recommended Increase in Headcount for HR		
Role	Grade	Quantity
Head of Learning and Development	AP	1 FTE
Dedicated in-house technical training specialist	HEO	1 FTE
Learning and Development Specialist	HEO	1 FTE
Learning and Development Officer (LMS)	CO	1 FTE
Recruitment Team Lead	HEO	1 FTE
Recruitment Specialist	EO	2 FTE
Recruitment Support	CO	1 FTE
Total		8 FTE

IT

- We found that there are opportunities within GSOC to improve digital maturity and the effectiveness and efficiency of the current ICT environment within the organisation to support overall organisational effectiveness.
- Currently GSOC has a planned project in train to procure and implement a new Case Management System. However, in the meantime, the organisation has worked with the software provider to implement 'quick fixes' on the existing system allowing for better data analysis and reporting in the short term.
- We recommend that the planned project to implement a new Case Management System will require a dedicated resource to assist in the development and implementation of the system. We have included this at 1 FTE at HEO level. This role, post implementation, will form part of the centralised IT team within the Office of the Police Ombudsman to further support the increase in headcount and helpdesk type demand of the IT function, and all of the work that this will entail.
- We note that there are 3 current vacancies at EO level. In addition to 1 FTE at HEO level, we also recommend a further increase of 1 FTE to be graded at CO role to provide general IT support. Therefore, in total we are recommending an increase in an additional **2 FTE**. This increased headcount is recommended in order to provide support to an enhanced workforce as well as supporting with onboarding of new employees and providing secondary support to the Case Management System implementation. We have not provided additional resourcing models for IT as we believe that the resourcing is sufficient for the additional workload expected.
- The recommended increase in FTE will ensure GSOC achieves the design principle set out in terms of responding to complex service delivery challenges.

Recommended Increase in Headcount for IT		
Role	Grade	Quantity
IT Manager	HEO	1 FTE
IT Support and Helpdesk	CO	1 FTE
Total		2 FTE

Policy and Research Unit

- We recommend the implementation of a combined policy and research unit. The creation of a research unit is a statutory requirement within the draft legislation.
- This unit will also have responsibility for policy at a corporate level to support and inform corporate decision making, strategic and business planning, and engagement with stakeholders in relation to trends, new legislation and other emerging issues. Combining the two functions in one unit is the most effective way to deliver these services in our view.

Workforce Plan

- Additionally, we recommend the library unit should sit within the Policy and Research Unit. We found that as a result of the increase in future staffing levels, the Library resourcing requires an additional **1 FTE** to assist with the increased demand on the service and the increase in investigations staff who will be searching for references, precedent and information. We recommend this be at the Clerical Officer grade to provide administrative support. This will ensure that the unit will be able to provide a high-quality information service to staff to include responding to information requests within agreed timeframes and assisting both the legal unit and investigators with court proceedings. We expect that there will be an increased demand for the Library's services as a result of the increase in headcount for Office of the Police Ombudsman, and therefore, recommend that the unit be resourced appropriately.
- We recommend that the unit focus on a more proactive way of thinking, in terms of actively scanning the external environment and policy updates and conducting benchmarking exercises with comparable organisations to ensure they are in line with best practice. This includes the following responsibilities:
 - Scanning the environment, identifying emerging issues and best practice relevant to the Police Ombudsman;
 - Draft policy papers to explore issues of interest and inform the Executive in the formulation of its policies and positions on emerging issues e.g. forthcoming legislation, current issues;
 - Analyse data and identify trends and patterns which will help focus and prioritise the organisations work and inform management on the organisation's performance;
 - Inform and prepare strategic and business plans and provide information on progress to achieving these including for annual reporting purposes;
 - Develop and provide a suite of management, performance and statistical dashboards, infographics and reports for management and other purposes;
 - Undertake research on civilian oversight and complaints about police including emerging best practice and benchmarking with sister organisations; and
 - Gathering feedback from stakeholders to inform organisational learning (via surveys etc.)
- As such, we recommend an increase in **5 FTE** to ensure efficient resourcing of the unit to provide for the above responsibilities in a timely manner. We recommend 1 AP to oversee all of the above work streams and 2 HEO's as a result of the strategic nature of the role and to manage specific work streams at the direction of the Analysis, Policy and Research Manager, with support from 1 EO and 1 CO.
- We do not recommend any additional headcount for Options 2 and 3 resourcing as we believe the recommended FTE increases should suffice for the workload required.

Recommended Increase in Headcount for Policy and Research Unit		
Role	Grade	Quantity
Analysis, Policy and Research Manager	AP	1 FTE
Senior Analysis, Policy and Research	HEO	2 FTE
Analysis, Policy and Research Coordinator	EO	1 FTE
Library and Analysis, Policy and Research Administrator	CO	1 FTE
Total		5 FTE

Secretariat Unit

- The scale and scope of the additional responsibilities for the new Office of the Police Ombudsman will have a direct impact upon the volume of administrative tasks required by the Secretariat. As such, we recommend an increase in **2 FTE** at EO and CO level. This will make a total of 6 within the unit comprising of 2 HEOs, 2 EOs and 2 COs allowing for a breadth of experience to take on varying levels of administrative tasks. We recommend that 1 FTE be assigned per each FTE in the leadership structure (Ombudsman, Deputy, CEO and 2 Directors), therefore allowing for the additional FTE in CO grade to provide support across all and ensuring sufficient cover for annual leave and sickness absence.

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- Although we recommend for enhanced delegated decision making resulting in reduced operational decisions for the Ombudsman, the Secretariat will still be required to provide support to the Ombudsman, Deputy Ombudsman and CEO in the area of strategic work and decisions required from the top level, this is in addition to day-to-day diary management and administrative support. This is inclusive of the vital role of coordinating communications in the Office of the Police Ombudsman which will be crucial for both organisational culture and day-to-day running of the organisation.
- The increase in 2 FTE is to ensure adequate resourcing for managing correspondence, calendars and appointments, meeting arrangements, documentation and briefing for the Executive Team within the organisation. It is vital that there are sufficient resources in this unit to allow for issues and complaints to be dealt with by the Executive Team in a timely, productive and efficient manner. This will sufficiently eradicate the inordinate risk of work not being completed to the right standards or being completed properly, by someone without sufficient experience.
- We have not provided further headcount for Options 2 and 3 resourcing as we believe that ensuring 1 FTE per Ombudsman, Deputy Ombudsman, CEO and the Directors is sufficient, in addition to having 1 FTE providing support across the secretariat.
- We recommend that the Secretariat Unit reports directly to the CEO in the revised structure as a result of their close working relationship and remit to support the Ombudsman, Deputy Ombudsman, CEO and Directors. This is a more appropriate reporting line which we have found through our benchmarking and best practice analysis of the external market.

Recommended Increase in Headcount for Secretariat Unit

Role	Grade	Quantity
Secretariat Officer	EO	1 FTE
Secretariat Administrator	CO	1 FTE
Total		2 FTE

Quality Management and Outcome Review

- Our review found that there is currently one AP in the Unit, with two vacancies. This is a unit which is in the process of being staffed for the first time. However, we recommend that the current policy FTE (1 AP) is located within this revised unit. The workload of this unit will expand in line with the assignment and reorganisation of the roles and responsibilities of the new Ombudsman model.
- We found that the current Policy Unit is currently operating effectively and efficiently, however will need additional resources to establish this unit in order to ensure that the policy library is up-to-date, relevant, accessible and reflective of all legislative changes that are anticipated by GSOC. It is vital that the entire policy library requires review in order to reflect the legislative changes.
- It was reported to us that this process will require widespread consultation within GSOC and external bodies. We predict that there will be a significant workload required in 2023 (and into 2024) regarding the need to review and revise practices and standards in light of legislative change.
- Given the magnitude of the transition that GSOC are currently undergoing, it will be vital that the organisation is up to date with any policy changes, new legislation and research to ensure success of the new Office of the Police Ombudsman. Going forward it is recommended that Office of the Police Ombudsman should stay on the cutting edge of new policy developments, external research and best practice for police oversight, and therefore will require additional resources.
- Additionally, this unit will be required to review appeals on inadmissible cases in addition to quality checking all documents to be sent from GSOC. Of all complaints received by GSOC, 40% are inadmissible and it is possible that 30-50% of these inadmissible cases will be subject to appeal under the new legislation, though it should be noted that historic data suggests that this number fluctuates substantially. Therefore, it is recommended that Office of the Police Ombudsman have dedicated resources to conduct these appeals. We are recommending this resource sits within Corporate Affairs rather than Operations in order to ensure independence and separation from original case decision.
- In 2021, there were 1,332 admissible complaints. 2,189 complaints were received in total and 40% of this is 875 inadmissible complaints. Since there is one FTE currently in the team, with 2 vacancies, this is equivalent of 291 cases on average per individual (875/3). Each employee works on average approximately 220 days per year meaning that they spend on average less than one day per inadmissible case per year. However, we recognise that certain appeals will require more lengthy review periods.

Workforce Plan

- As such, In terms of quantifying the additional headcount, we have provided options in terms of future complaints and the required headcount for the same based on an estimate of inadmissible complaints in 2023.
 - Option 1: Of the 2,300 complaints, 805 will be inadmissible. 805/178 (cases per staff member per annum) equals 5 FTE total to deal with these complaints. There are currently 3 FTE in the team and so we recommend an increase of **2 FTE** to a total of 5.
 - Option 2: In the event that there are an **extra 250 inadmissible complaints** per year, this would amount to a total of 1,055 inadmissible complaints per year which would require no further increase in FTE as the original recommendation will suffice.
 - Option 3: In the event that there are a **further extra 250 inadmissible complaints per year**, this would amount to a total of 1,305 inadmissible complaints per year, this would require an additional 2 additional FTE on top of the 2 FTE in option 1, bringing the total increase to 4 FTE.
- As such, to further establish the Unit and enhance the quality management function within GSOC, we recommend an additional **2 FTE** (Currently 2 vacancies at HEO and EO level) and we recommend that staffing levels of the unit be reviewed annually as the unit's functions evolve. The recommended increase in headcount will allow GSOC to efficiently respond to any appeals that they receive, of which it is expected to be between 30-50% of inadmissible cases. It also encourages GSOC to comply with the set of design principles set out in this report. In particular, adhering to the principle of defined and appropriate spans of control, ensuring that the efficiencies of this design will be enhanced and maintained.

Recommended Increase in Headcount for Quality Management and Outcome Review

Role	Grade	Current Quantity	Option 1	Option 2	Option 3
Senior Quality Management and Review	AP	1 FTE	0 FTE	0 FTE	0 FTE
Quality Management and Review Manager	HEO	0 FTE (1 vacancy)	1 FTE	0 FTE	1 FTE
Quality Management and Review Officer	EO	0 FTE (1 vacancy)	1 FTE	0 FTE	1 FTE
Total Increase		1 FTE	2 FTE	0 FTE	4 FTE

Transition

- Our review found that currently the Transition Unit are relatively well staffed. However, we recommend an additional **2 FTE** in order to ensure successful transition to the new Ombudsman model whilst ensuring compliance with the new legislation. This is to reflect an increase in change-related tasks such as communications delivery, training and employee engagement throughout the transition period.
- We have not recommended any additional resourcing as a result of an increase in 250-500 cases as this unit will be sufficiently resourced to deal with the same.
- We are recommending that the two extra roles are graded at Principal Officer and Higher Executive Officer Level due to the complexity of the work. It is essential that the PO resource is recruited as soon as possible to take the lead in planning the transition as it is commencing, ensuring sufficient resources, and a positive experience of change for all staff.
- We recommend that these additional posts will be responsible for effective change leadership on complex change projects including that of cultural and leadership change. These roles will be responsible for ensuring continued employee engagement and business continuity throughout the change process. These roles are graded at a more senior level to reflect the risk of the transition project and the level of accountability required within these roles. Therefore, leading change and breaking down the existing silos and ways of working. Additionally, during implementation, we recommend the transition team to be responsible for project and programme management.
- Additionally, we recommend that the Transition Unit report directly to the CEO in the revised structure. This will ensure the PO is involved in driving the strategic direction and change of the organisation.
- In addition to enhanced permanent FTE within Office of the Police Ombudsman, we recommend that the organisation procure sufficient temporary FTE with sufficient experience in the form of external expertise to assist with implementation during the transition phase.

Workforce Plan

- We recommend that the organisation will need consulting expertise totalling 1 Associate Director, 1 Manager and 1 Senior Consultant for a total of 3 days each per week for up to 2 years. This will be for the purposes of providing strategic direction on Change Leadership, Change Communications, Employer Branding and Employee value proposition as well as Programme Management Office (PMO) support. Employing temporary consultants provides for sufficient resourcing to assist with a smooth transition for staff and ensuring the escalation and resolution of any issues as they occur. We have included this in the implementation plan section of this report.

Recommended Increase in Headcount for Transition Unit

Role	Grade	Quantity
Head of Transition	PO	1 FTE
Transition Officer	HEO	1 FTE
Total		2 FTE

Data Protection Unit

- Currently, there is a Data and Governance Unit within GSOC, As a result of the enhanced remit and as such governance activities, we recommend splitting the current Data and Governance unit into two separate functions. We recommend for the implementation of the Data Protection Unit, and that this will report into the Corporate Affairs division and be responsible for Data Protection and FOI duties including records management.
- Our review found that the new legislation will have a substantial impact on the Data and Governance Unit as a direct result of the increase in investigations undertaken by GSOC, and it was reported that data access requests have increased by 40% over the last two years alone, resulting in a big backlog for the unit. Data protection is a growing area in the current working climate, which is required to have a particular expertise.
- As such, we recommend that this is formed by the current Data Unit employees initially, and is headed up by the Data Protection Officer who has responsibility for all aspects of GDPR compliance and dealing with Data Access, Freedom of Information requests and records management.
- Additionally, we note the increasing trend in the number of information requests received from senior members of An Garda Síochána to assist them with criminal offence investigations, thus increasing the amount of advice being sought.
- As such, we recommend to increase the Data Protection unit by **3 FTE** (1 HEO, 1 EO, 1 CO). Therefore, allowing for appropriate spans of control. Additionally, due to the close working relationship, we recommend that GSOC allows for the cross functional collaboration amongst the units in order to enhance knowledge share and learnings. This will further contribute to the learning culture and putting people at the forefront of the organisation.
- We do not recommend any additional headcount for Options 2 or 3 resourcing as the recommended increase should suffice for the workload required (this will require minimal input and support from the Data Protection Unit).

Recommended Increase in Headcount for Data Protection Unit

Role	Grade	Quantity
Data Protection Manager	HEO	1 FTE
Data Protection Officer	EO	1 FTE
Data Protection Coordinator	CO	1 FTE
Total FTE		3 FTE

Governance Unit

- Our review found the requirement for establishing a separate Governance Unit. This unit should be responsible for managing the organisation's corporate governance, audit and risk. This is inclusive of ensuring compliance with governance codes of practice, risk management, supporting the ARC and liaising with the Department of Justice regarding oversight agreements. As such, we recommend an initial increase in headcount of 4 FTE (1 AP, 1 HEO and 2 EO's).

Workforce Plan

- This allows for sufficient spans of control and leadership during the implementation phase. This will also allow expertise at a number of levels to implement a sufficient governance model in the Office of the Police Ombudsman. We recommend that this unit's resourcing requirements be reviewed on an ongoing basis as the Office of the Police Ombudsman expands and throughout the transitional period.
- We recommend that this Unit be reviewed on an ongoing basis as headcount increases further post transition. This is to ensure that there continues to be sufficient resourcing given the increase in workload. However we have not recommended increased staffing for Options 2 and 3 as we believe that the proposed resourcing will be sufficient for this demand.

Recommended Increase in Headcount for Governance Unit		
Role	Grade	Quantity
Senior Governance Manager	AP	1 FTE
Governance Manager	HEO	1 FTE
Governance Officer	EO	2 FTE
Total FTE		4 FTE

Data and Analysis Unit

- We recommend that this unit is centred around data analysts and researchers for the Office of the Police Ombudsman for data driven decision making. We recommend that the unit provides support to both GSOC Corporate Services and Investigations divisions.
- We recommend that this unit is responsible for the collection and analysis of data, trends and patterns, to feed this into corporate governance, strategic thinking, policy making, and business planning and reporting, in order to ensure efficient preparation of data for publication.
- We recommend that this unit is responsible for the developing and tracking of KPI's across the organisation and reporting on the performance of the organisation.
- As such, we recommend an increase in **4 FTE** for the unit. We recommend that this includes one AP, who will provide leadership and assume overall risk responsibility for the unit, one HEO, who will provide strategic direction and ensure the development of the Intelligence Function within GSOC. This role will also provide day-to-day people management for more junior members of the team within the unit. As such, we also recommend an increase of one EO to manage and provide oversight of all data and research needs for an investigation, and a CO for administrative support. This builds out a team with varying responsibilities to deliver the future Unit's duties. We have not recommended additional resourcing for Options 2 and 3 as we believe this is sufficient to cover any workload resulting from an additional 250-500 complaints per annum.
- The recommendation in relation to publishing reports and increasing public knowledge on investigations that are closed, or ongoing was a key finding of comparable organisations remit which was found through the benchmarking analysis. It also aligns with the Design Principles set out in this report with the Commissioners, in that it will improve GSOC's relationship with the public and therefore promote public accountability of policing through effective engagement with external stakeholders.

Recommended Increase in Headcount for Data and Analysis Unit		
Role	Grade	Quantity
Head of Data and Research	AP	1 FTE
Data, Analyst and Research Manager	HEO	1 FTE
Data, Analyst and Research Officer	EO	1 FTE
Administration Support	CO	1 FTE
Total		4 FTE

Workforce Plan

Operations

Investigations Director and Deputy Directors

- The current ratio of Investigations Deputy Directors to Operations staff is 3:100 (1:33). As the operations workforce increases, the DDO headcount will need to increase in line with this. The operations headcount is expected to increase by 137 staff for a total of 237 FTE in Operations (Option 1), as provided within our recommendations, resulting in a ratio of 5:237 (1:48).
- As such, we recommend reviewing the delegation of decision-making powers to lower levels within the organisation and employing **5 FTE** as Deputy Directors of Operations to manage these requests and to manage the increase in the workforce in the Operations Division. The five new Deputy Directors will also perform an oversight role of all investigations as well as operating in a risk management capacity.
- We are recommending that the five extra roles are graded at Principal Officer Level due to the complexity of the work.
- We have not recommended additional staffing for Options 2 and 3 resourcing as we believe the increase in 5 FTE for DDOs is sufficient to deal with this workload.

Recommended Increase in Headcount for Deputy Directors of Operations

Role	Grade	Quantity
Deputy Directors of Operations	PO	5 FTE

Investigations Division

- Our review identified that the lack of resources in investigations is a significant constraint on their operations. The number of complaints received by GSOC has risen steadily over the last few years. There was a 12% increase in complaints received in 2021, totalling to 2,189. Of these complaints, 61% were dealt with by the Investigations Unit.
- We note that as a result of the new legislation, the work carried out by the investigations unit is going to increase in volume. The expansion of remit includes investigating matters such as the inclusion of An Garda Síochána civilian personnel (this will increase the population of subjects of GSOCs investigations by 3,800 people).
- Currently there is no information or data available from An Garda Síochána to suggest the level of complaints that GSOC will be responsible for investigating. As such, we have proposed for a sliding scale of investigation resourcing options in order to allow the organisation to scale up to meet the demand that emerges.
- At the time of review, current caseloads were reported by staff members within the Operations Directorate at a figure of 50-60 cases each, while GSOC data calculates the **average** caseload figure within the region of 18-23 cases per investigator per annum. Through the completion of extensive benchmarking, we find that best practice in caseloads per investigator is in the region of 2-5 cases per person per annum accounting for a balance of severity within the cases. Given the current caseload for investigators and the findings from benchmarking, we recommend reducing the caseload to 10 new cases assigned per investigator per year. Please see Appendix 1 for further benchmarking information.
- It is our recommendation that the Investigations Unit should create a centralised Major Incidents Unit to deal with cases that are a high priority to ensure that there are no delays in regular ongoing investigations. Alongside this, we recommend the appointment of a number of specialists, or subject matter experts who can be utilised if such an investigation arises. Such expertise includes child interviewing, digital forensics and sexual offences. This will reduce the reliance on An Garda Síochána for this expertise and further contribute to GSOCs independence. We recommend for each of the regional offices to have a major incidents person, to ensure that they can attend investigations on the ground and reducing the reliance on major incidents in the Dublin office.
- As a result of the above, we recommend an additional **107 FTE** (option 1) to manage the expansion of the Investigations Unit's remit, to include a Major Incident Unit, complaints that An Garda Síochána were previously responsible for and specialist investigators within this figure. Of which, we recommend an increase in headcount for the grades of AP, HEO, EO and CO. This will allow for the Unit to respond to the increased number of cases that Office of the Police Ombudsman will deal with as a result of the expanded remit as well as the consistent increase in complaints received annually. Employing staff at CO grade will also allow for sufficient administrative support at each level.

Workforce Plan

- In terms of quantifying the additional headcount, in 2021 the Investigations Unit investigated 1,332 admissible complaints. Although this represents 61% of overall complaints, due to the addition of investigations previously undertaken by AGS and instances of concern, we estimate the rate of admissibility is likely to rise to 65%. We have provided the following options based on the estimate of admissible complaints in 2023. We have included an estimate of the legacy caseload within this figure, alongside local interventions, investigations previously undertaken by AGS and investigating incidents of concern which will sit within the remit of the Office of the Police Ombudsman to review. As we have outlined previously, we have calculated the figure based upon each investigator having a caseload of 10 investigations per annum, which we believe is sustainable for the Office of the Police Ombudsman and which is still higher than best practice we found from benchmarking other police ombudsmen.
 - Option 1: Our recommendation is based off a future estimate of 2,300 complaints per annum, of that 1,495 are admissible: $1,495/10$ (10 cases per investigator), we therefore recommend a total of 150 FTE in Investigations Division to efficiently deal with the future workload. Subtracting the current 43 FTE investigators equals **107 FTE increase**.
 - Option 2: If there are an additional 250 admissible complaints (total of 1,745): $1,745/10$, we recommend a total of 175 FTE to deal with this. $175-43 =$ we recommend an **increase of 132 FTE**.
 - Option 3: If there are a further additional 250 admissible complaints (total 1,995): $1,995/10$, we recommend a total of 200 FTE to deal with this. $200-43 =$ we recommend an **increase of 157 FTE**.
- We recommend that each geographical location have a specified major investigations person to reduce reliance on this function in the Dublin office and to ensure accessibility when required to travel to investigate specific cases. Equally, it is important that each location has an individual with specialist incident room coordination skills as well as an a Major Incident Response Office Manager.
- We recommend the allocation of one CO per individual investigations team, at a maximum capacity of 10 investigators per team. They will be responsible for providing admin support to each investigations team, ensuring that the teams have adequate administrative support.

Recommended Increase in Headcount for Investigations					
Role	Grade	Current Quantity	Option 1	Option 2	Option 3
Senior Investigations Officer	AP	8 FTE	13 FTE	17 FTE	20 FTE
Investigations Officer	HEO	33 FTE	60 FTE	72 FTE	84 FTE
Assistant Investigations Officer	EO	10 FTE	26 FTE	32 FTE	40 FTE
CO Investigations Division	CO	5 FTE	8 FTE	11 FTE	13 FTE
Increase in Investigations		56 FTE	107 FTE	132 FTE	157 FTE

Case Officers – Admissibility

- Our review highlighted that the Admissibility Unit are under significant pressure, with the amount of complaints received increasing annually. From 2020-2021, there was a 11.5% increase in complaints received. We found that the increase in volume of complaints is exceeding the amount of staff within the unit, resulting in a significant backlog within the Unit.
- As a result of the new legislation, the definition of an “admissible complaint” has expanded, while the criteria for making a case inadmissible is going to be much less restricted. While the new legislation has very similar admissibility criteria to the current Act, all complaints which are currently dealt with in local intervention will in future be subject to admissibility decisions and potential review, which will increase workload.
- As such, we recommend an increase in **3 FTE** to deal with both the current backlog and the expected workload that will come with expanded remit that will come to the unit.

Workforce Plan

- In 2021, there were 2,189 complaints received. This is the equivalent of 274 complaints per head (2,189/8 (Current FTE)). Each Admissibility staff member works approximately 205 days per year meaning that they spend an average of approximately 1.3 days per complaint. As the amount of complaints received is expected to increase in 2023, and considering the current backlog, we recommend for an increase of an additional 3 FTE. This will allow 2 of the additional FTE to deal with circa 8 cases per week for 6 months to close the backlog, enduring legacy and ongoing cases, and will allow the team to have sufficient resources to deal with the expanded remit.
- We recommend the 3 FTE are graded at HEO level allowing them to deal with the complex and serious nature of the cases that are received for a decision, therefore, reducing the timescale for the complainant. We recommend that the 3 FTE employed have sufficient experience and knowledge to deal with this.
- We have not recommended further resourcing of Options 2 and 3 for this team as we believe the recommended increase will be sufficient in the case of any additional complaints in the range of 250-500.
- We recognise that during the implementation phase there will be a dual system of complaints as a result of the two pieces of legislation, both the previous and revised Bill. As this will be in place for a finite period of time, we recommend that a number of the current 6 FTE focus on the complaints to be managed in line with the previous Bill, with the remaining 3 FTE alongside the additional 2 FTE recommended below focussing on complaints being managed via the revised Bill. Over time, more staff will transition to dealing with the complaints under the revised Bill, who will receive support from those that have been managing the complaints since the implementation of the Bill.

Recommended Increase in Headcount for Case Officers - Admissibility		
Role	Grade	Quantity
Higher Executive Officer – Admissibility	HEO	3 FTE
Total		3 FTE

Case Officers – Child Protection

- Our review found that this unit is well structured and resourced and is effectively and efficiently delivering its required outputs. We do not recommend any increase in headcount or structure for this unit.

Case Officers – Section 94

- The concept of a 94(1) investigation no longer exists in the new legislation. However, there will be an element of legacy 94(1)s for a period of time in 2024. Therefore, we recommend that the unit remains staffed as it currently is to ensure that all of these duties can be performed, and are redeployed to manage complaints suitable for AGS resolution when the new legislation is in place.

Protected Disclosures Unit

- The Protected Disclosures Act, 2014 (“the PD Act”) came into effect on the 15th July 2014. With effect from the 23rd July 2014, the Minister for Public Expenditure and Reform prescribed the members of the Garda Síochána Ombudsman Commission (the “Commissioners”) as prescribed persons for receipt of disclosures of relevant wrongdoings made by workers in An Garda Síochána (SI 339/2014). Under the provisions of the original Garda Síochána Act, 2005 (2005 Act) members of the Garda Síochána were precluded from making complaints to GSOC. Section 19 of the PD Act amended the provisions of the 2005 Act, to make provision for GSOC to investigate disclosures of relevant wrongdoing, made by workers in An Garda Síochána, including garda members.
- Our review found that the unit is currently facing extremely high workloads as well as a backlog of cases. However, we note that at the time of issue of the report, there were four vacancies for the unit (4 FTE). In our view, including the current vacancies, the baseline resources in the team are adequate. As such, we do not recommend an increase in headcount for this unit, but that the four vacancies are filled as soon as possible.

Workforce Plan

Intelligence Unit

- Our review found that there are currently three intelligence analysts in the unit. We believe that there will be significant benefit to GSOC in expanding the Unit, which will allow GSOC to collect, analyse and develop sensitive information that can be utilised for data driven decision making. We recommend that the unit provides support to the Investigations division.
- We expect that this unit will take responsibility for intelligence requests, information handling, creating an intelligence source register for GSOC and acquisition of communications data.
- We note that there are currently 3 HEO's in the unit, and as such we recommend an increase in 2 FTE, one being graded at AP level to provide leadership and direction to the unit, and one role graded at HEO due to the required skillset for this role holder.
- We have not recommended further resourcing for Options 2 and 3 options for the Unit as we believe the recommended increase in headcount will suffice in terms of any additional complaints in the range of 250-500.

Recommended Increase in Headcount for Intelligence		
Role	Grade	Quantity
Intelligence Manager	AP	1 FTE
Investigating Officer	HEO	1 FTE
Total		2 FTE

Additional Unit Recommendations to be implemented in the Operations Division

Casework – Triage Unit

- Given the volume of complaints received within GSOC and by utilising our benchmarking findings from comparable organisations, we recommend the implementation of a Triage Unit within casework in order to control the designation and allocation of cases and investigations. This will allow for enhanced efficiency and timeliness of the overall process as the Triage Unit can decide whether or not the case can be closed in the initial stages, and assign them to the right team taking into account the category of the complaint and the level of significance.
- We recommend that the Customer Contact Centre will work closely with the Triage Unit in that they pass the cases to the Triage Unit to screen the cases. We expect that the Triage Unit will review the cases and as a result of their findings, will assign them to the correct Investigations team to investigate the complaint. The Triage will allow for certain cases to be closed in the initial stage if they are not eligible for investigation, therefore, reducing the backlog in the Investigations division and improving efficiency and timeliness of the process.
- Additionally, Triage will be responsible for dealing with service level complaints that need to be referred to An Garda Síochána.
- As such, we recommend an additional **5 FTE** to build the team and embed the Unit into the revised structure and to manage the allocations in a timely manner. Of this figure, we have recommended 1 AP and 1 HEO in order to lead the team and provide direction, with the support from 2 EOs and 1 CO. This figure is in line with the scaling of the organisation, increase in headcount and increased remit for the organisation, resulting in a requirement for a triage process to be embedded. The implementation of a triage unit was also a key finding through the benchmarking process in that comparable organisations found the triage role as extremely beneficial to the overall Investigations process.
- Our benchmarking process showed that the implementation of a triage unit, particularly within Police Ombudsman of Northern Ireland, would allow the organisation to efficiently prioritise and allocate cases in a way which ensures a good experience for the citizen as well as streamlining the investigations process.
- It is expected in 2023 to receive a total of 2,300 complaints, all of which, the triage unit will be responsible for reviewing and designating. It is vital for efficient workflow that this unit is adequately staffed to deal with the demand of complaints expected, and to reduce any delays upon Investigations. Increasing by **5 FTE** in the triage unit allows each member in the Unit to triage approximately 460 complaints per year. Of which the Triage Unit will have the authority to close certain cases prior to allocating them to a specific team, therefore, reducing the investigations workload and backlog overall, improving efficiency and timeliness of process.

Workforce Plan

- Option 2: If cases increase by 250, we do not recommend an additional headcount as the workload will increase marginally per person per year to 510 complaints which equates to approximately 43 complaints per month.
- Option 3: If the cases increase by additional 250 to amount to 2,800 complaints, we recommend an additional increase in 1 FTE to allow for sufficient cover within the triage unit and keeping the caseloads per employee consistent, with a marginal increase in caseload of 467 complaints per year per employee.

Recommended Increase in Headcount for Triage				
Role	Grade	Option 1	Option 2	Option 3
Senior Triage Officer	AP	1 FTE	0 FTE	0 FTE
Triage Officer	HEO	1 FTE	0 FTE	0 FTE
Assistant Triage Officer	EO	2 FTE	0 FTE	1 FTE
Triage Support	CO	1 FTE	0 FTE	0 FTE
Total		5 FTE	0 FTE	1 FTE

Digital Investigation and Digital Forensics Unit

- We found that digital investigations and forensics is a current and future gap in GSOCs provision of services. Filling this gap will complement the investigations work, further reducing the reliance on An Garda Síochána and other external agencies for such services and adhering to the design principle of independence in police oversight.
- During our benchmarking process, Office of the Police Ombudsman Northern Ireland shared with us that they believe they do not currently hold enough digital expertise and they believe that it is essential to build this skill in-house going forward. They shared that they are currently building a digital investigation capability. The Independent Office of Police Conduct for England and Wales do have a Digital Evidence Unit.
- We recommend that the unit's function include the development of case specific digital media forensic strategies in conjunction with the lead investigation, to include correct seizure methods, timescales and identifying routes of data acquisition. They will also be responsible for analysing and preparing reports on the evidence obtained from acquisitions.
- As such, to set up the unit, we recommend a headcount of **7 FTE** at varying levels to build the team. As such, we recommend 1 AP1 and 6 HEO's, who will be responsible for providing direction and leading the unit. We recommend this grading as a result of the demand for staff with this skillset and to attract candidates of a high calibre. The grading will allow this unit to operationalise more effectively and allow for designations and delegations to be granted at Investigating Officer level.
- We recommend for 4 HEO's to be located in Dublin, and the remaining 2 HEO's to be located in each of the regional offices to assist with investigations and the requirement for their skill set, therefore placing 1 in Cork and 1 in Longford (based on current estate footprint).
- We have not recommended additional resourcing for Options 2 and 3 for this unit as we believe the recommended resourcing is sufficient for the additional workload expected in the range of an additional 250-500 complaints.
- This increase is in line with the scaling of the organisation in terms of both headcount and remit. The review found that there was a 12% increase in complaints received in 2021, of which is going to increase further as a result of the expanded remit of the Office of the Police Ombudsman. The implementation of 7 FTE in this Unit is to allow for sufficient support for the expected increase in Investigations workload that require digital or forensics expertise.
- The implementation of this unit within the revised structure will protect the Office of the Police Ombudsman against any risks in relation to their reputation and public confidence as a direct result of ensuring independence and reducing their reliance on An Garda Síochána, whilst providing this specialised service in investigating complex and sensitive complaints.

Workforce Plan

Recommended Increase in Headcount for Forensics Unit		
Role	Grade	Quantity
Senior Digital and Digital Forensics Manager	AP1	1 FTE
Senior Digital and Digital Forensics Officer	HEO	6 FTE
Total		7 FTE

Specialist Support Unit

- Our review found that due to GSOC's scope to deal with allegations of domestic abuse, gender and sexual violence and offences against children, and with this being a national priority, there is a requirement to establish a dedicated specialist unit for such investigations.
- Currently, GSOC relies on An Garda Síochána Protective Services to complete interviews with children on behalf of GSOC. As such, we recommend the establishment of subject matter experts and enhance training for staff in this unit to remove the reliance on An Garda Síochána and enhance GSOC's independence.
- We note the sporadic nature of these investigations alongside the requirement to ensure the implementation of continuous training in this area to enhance skillsets. Additionally, we recommend that GSOC invests in a dedicated specialist interview space to conduct interviews. This will allow GSOC to use these skills when managing sensitive cases and dealing with vulnerable victims.
- We recommend the unit to work closely with An Garda Síochána to develop best practice and to take responsibility for disseminating such knowledge across the organisation.
- Further contributing to the requirement for the establishment of such a unit is the statistic of the increase in sexual offences being reported, which has increased by nearly 30% in the last nine years. As such, we recommend an increase in headcount of **8 FTE** to establish the unit, allowing each staff member to work on approximately 30 cases annually if there is an even split amongst the proposed increase in FTE. This alongside the responsibility of the unit to provide training to staff on this topic in order to reduce their reliance on An Garda Síochána warrants the 8 FTE. We recommend that this includes one AP, who will provide strategic direction and ensure the development of Protective Services available and three HEO's, who will provide managerial support and oversight function to the AP. Additionally, to build the team and ensure sufficient support, we recommend three EO's and one CO to provide support, both on the casework and administrative side.
- We recommend a flexible model to be put in place for this unit so that the resources can both lead investigations classified as specialist investigations, and also support the wider investigations division with cases when and as needed, on an ad hoc basis. As such, we have not recommended further resourcing for Options 2 and 3 for the Unit as we believe that the recommended increase in headcount will suffice in terms of any additional complaints in the range of 250-500.
- The rationale for the increase in headcount of 6 FTE complements the design principles set out with the Commission with regard to promoting public accountability of policing and GSOC's independence. Additionally, this will allow GSOC to provide a quality service that meets the needs of stakeholders in terms of upholding their human rights.

Recommended Increase in Headcount for Specialist Support Unit

Role	Grade	Quantity
Specialist Support Services Manager	AP	1 FTE
Senior Specialist Support Services Officer	HEO	3 FTE
Assistant Specialist Support Officer	EO	3 FTE
Administrative Support	CO	1 FTE
Total		8 FTE

Workforce Plan

Case Officers – Customer Contact Unit

- We recommend the establishment of a Customer Contact Unit within Casework, with an initial headcount of 13 staffed from the current AST Unit (1 AP, 1 HEO, 1 EO and 9 CO's with 1 current CO vacancy). Therefore, we recommend that the AST unit will be redeployed within the Office of the Police Ombudsman with those resources allocated to the customer contact unit.
- They will be responsible in forming the first point of contact for complaints and queries from the public and taking over the workload that is outside of investigations from AST. We recommend that this unit is responsible for answering calls and correspondences with the public, and in particular this unit should take responsibility for the additional complaints GSOC will be responsible for, that were previously the responsibility of An Garda Síochána. As of now the number of cases expected is unknown. As such, this unit will be responsible for looking after customer experience and customer service.
- For the establishment of this unit, we recommend a staffing model as recorded below to deal with customer queries. We recommend that this unit be reviewed on an ongoing basis, and for the headcount to increase in response to the amount of additional complaints received, and as such, the amount of queries the unit has to deal with. We recommend for the AP and HEO to lead the unit and provide strategic and managerial direction, with EO's and CO's to provide support and administrative duties to the HEO, allowing for the establishment of appropriate spans of control and organisational layers in line with the design principles set out by the Commissioners. This will further support the unit whilst managing annual leave, sickness absence, and training opportunities.
- On a projection of 2,300 complaints per year, the customer contact unit will receive c45 complaints per week and this equates to approximately 6.5 complaints per week per person. This will allow approximately 5-6 hours per complaint to log the complaints in the CMS, and deal with further information requests. This will also allow time for those within the unit to handle calls, meet members of the public and conduct other duties assigned to them. We have provided future FTE numbers below in the event of higher case numbers:
 - Option 2: In the event of an extra 250 complaints per year, the unit would carry an extra 5 cases per week, requiring an extra 1 FTE to deal with these.
 - Option 3: In the event of a further extra 250 complaints per year, the unit would hold an extra 10 cases per week which would require an extra 2 FTE to deal with these.
- Given that this unit is responsible for customer experience and is the first point of contact for complaints, it is vital that the resourcing of this team is robust enough to deal with the demand. This will allow for the organisation to meet the design principle of promoting public accountability through managing external stakeholder relationships and ensuring effective engagement with the same.

Recommended Increase in Headcount for Customer Contact

Role	Grade	Option 1	Option 2	Option 3
Customer Contact Officer	HEO	0 FTE	0 FTE	1 FTE
Assistant Customer Contact Officer	EO	0 FTE	1 FTE	1 FTE
Total		0 FTE	1 FTE	2 FTE

Summary of Recommended Increase in Leadership

It is noted that these posts are not incremental FTE since they will replace the existing 3 Commissioners:

Recommended Allocation of Leadership Headcount

Role	Grade	Quantity
Ombudsman	Secretary General	1 FTE
Deputy Ombudsman	Deputy Secretary General	1 FTE
CEO	Assistant Secretary	1 FTE
Total FTE Leadership		3 FTE

Workforce Plan

Summary of Recommended Increase in Headcount Corporate Affairs

Recommended Total Increase in Headcount				
Role	Grade	Option 1	Option 2	Option 3
Senior Legal Advisors	AP	1 FTE	1 FTE	2 FTE
Senior Legal Executive	HEO	1 FTE	3 FTE	3 FTE
Communications Manager	HEO	1 FTE	1 FTE	1 FTE
Communications Research & Public Affairs Officers	EO	3 FTE	3 FTE	3 FTE
Head of Finance	AP	1 FTE	1 FTE	1 FTE
Finance Manager	HEO	1 FTE	1 FTE	1 FTE
Finance Officer	EO	2 FTE	2 FTE	2 FTE
Finance Administrator	CO	1 FTE	1 FTE	1 FTE
Head of Learning and Development	AP	1 FTE	1 FTE	1 FTE
Dedicated in-house technical training specialist	HEO	1 FTE	1 FTE	1 FTE
Learning and Development Specialist	HEO	1 FTE	1 FTE	1 FTE
Learning and Development Officer (LMS)	CO	1 FTE	1 FTE	1 FTE
Recruitment Team Lead	HEO	1 FTE	1 FTE	1 FTE
Recruitment Specialist	EO	2 FTE	2 FTE	2 FTE
Recruitment Support	CO	1 FTE	1 FTE	1 FTE
IT Manager	HEO	1 FTE	1 FTE	1 FTE
IT Support and Helpdesk	CO	1 FTE	1 FTE	1 FTE
Analysis, Policy and Research Manager	AP	1 FTE	1 FTE	1 FTE
Senior Analysis, Policy and Research	HEO	2 FTE	2 FTE	2 FTE
Analysis, Policy and Research Coordinator	EO	1 FTE	1 FTE	1 FTE
Library and Analysis, Policy and Research Administrator	CO	1 FTE	1 FTE	1 FTE
Secretariat Officer	EO	1 FTE	1 FTE	1 FTE
Secretariat Administrator	CO	1 FTE	1 FTE	1 FTE
Quality Management and Review Manager	HEO	1 FTE	1 FTE	2 FTE

Workforce Plan

Summary of Recommended Increase in Headcount Corporate Affairs (Cont.)

Recommended Total Increase in Headcount				
Role	Grade	Option 1	Option 2	Option 3
Quality Management and Review Officer	EO	1 FTE	1 FTE	2 FTE
Head of Transition	PO	1 FTE	1 FTE	1 FTE
Transition Officer	HEO	1 FTE	1 FTE	1 FTE
Data Protection Manager	HEO	1 FTE	1 FTE	1 FTE
Data Protection Officer	EO	2 FTE	2 FTE	2 FTE
Data Protection Coordinator	CO	1 FTE	1 FTE	1 FTE
Senior Governance Manager	AP	1 FTE	1 FTE	1 FTE
Governance Manager	HEO	1 FTE	1 FTE	1 FTE
Governance Officer	EO	1 FTE	1 FTE	1 FTE
Head of Data and Research	AP	1 FTE	1 FTE	1 FTE
Data, Analyst and Research Manager	HEO	1 FTE	1 FTE	1 FTE
Data, Analyst and Research Officer	EO	1 FTE	1 FTE	1 FTE
Data, Analyst and Research Administration Support	CO	1 FTE	1 FTE	1 FTE
Total FTE Corporate Affairs		43 FTE	45 FTE	48 FTE

Workforce Plan

Summary of Recommended Increase in Headcount – Investigations

Recommended Total Increase in Headcount				
Role	Grade	Option 1	Option 2	Option 3
Deputy Directors of Operations	PO	5 FTE	5 FTE	5 FTE
Senior Investigations Officer	AP	13 FTE	17 FTE	20 FTE
Investigations Officer	HEO	60 FTE	72 FTE	84 FTE
Assistant Investigations Officer	EO	26 FTE	32 FTE	40 FTE
CO Investigations	CO	8 FTE	11 FTE	13 FTE
Higher Executive Officer – Admissibility	HEO	3 FTE	3 FTE	3 FTE
Head of Intelligence	AP	1 FTE	1 FTE	1 FTE
Investigating Officer	HEO	1 FTE	1 FTE	1 FTE
Senior Triage Officer	AP	1 FTE	1 FTE	1 FTE
Triage Officer	HEO	1 FTE	1 FTE	1 FTE
Assistant Triage Officer	EO	2 FTE	2 FTE	3 FTE
Triage Support	CO	1 FTE	1 FTE	1 FTE
Senior Digital and Forensics Manager	AP1	1 FTE	1 FTE	1 FTE
Senior Digital and Forensics Officer	HEO	6 FTE	6 FTE	6 FTE
Specialist Support Services Manager	AP	1 FTE	1 FTE	1 FTE
Senior Specialist Support Services Officer	HEO	3 FTE	3 FTE	3 FTE
Assistant Specialist Support Services Officer	EO	3 FTE	3 FTE	3 FTE
Administrative Support	CO	1 FTE	1 FTE	1 FTE
Customer Contact Officer	HEO	0 FTE	0 FTE	1 FTE
Assistant Customer Contact	EO	0 FTE	1 FTE	2 FTE
Total FTE Investigations		137 FTE	163 FTE	191 FTE

Workforce Plan

Current Workforce Plan

	Grade	Administration														Operations							Total	
		Commissioners Administration Director and Deputy Directors	Legal Unit	Communications Unit	Library Unit	Corporate Services	HR/Training	IT	Policy Unit	Secretariat	Quality Assurance and Review	Data and Governance	Transition	Investigations Director and Deputy Directors	Investigations Division	Case Officers - AST	Case Officers - Admissibility	Case Officers - Child Protection	Case Officers - Section 94	Protected Disclosure Unit	Intelligence Analyst Unit			
December 2022 Workforce	Secretary General	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
	Assistant Secretary	2	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	3
	Director (PO Higher plus Director Allowance)	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
	Principal Officer	0	2	1	0	0	0	0	0	0	0	0	0	3	0	0	0	0	0	0	0	0	0	6
	Assistant Principal	0	0	2	1	0	1	1	1	2	0	1	1	1.7	0	8	1	1	0	1	1	1	0	23.7
	Higher Executive Officer	0	0	0	2	0	1	2	1	0	0	0	0	1	0	33	1	6	1	1	7	3	59	
	Executive Officer	0	0	2	1	0	3	2	1	0	1	0	4	0	10	1		1	10	1	0	0	37	
	Clerical Officer	0	0	2	0	0	2	2	1	0	1	0	1	0	0	9	0	0	0	0	0	0	18	
	SVO	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1	
	Total FTE	3	3	7	4	0	7	7	4	2	3	1	6	2.7	4	51	12	7	2	12	9	3	149.7	
	Total FTE	3	46.7														100							149.7
	Variance	0	-1														-0.95							-1.95
	Current Vacancies	0	0	3	0	0	1	0	3	0	1	2	2	0	0	4	1	0	0	0	2	0	19	
	Total Staff Including Vacancies	3	3	10	4	0	8	7	7	2	4	3	8	2.7	4	55	13	7	2	12	11	3	168.7	

Workforce Plan

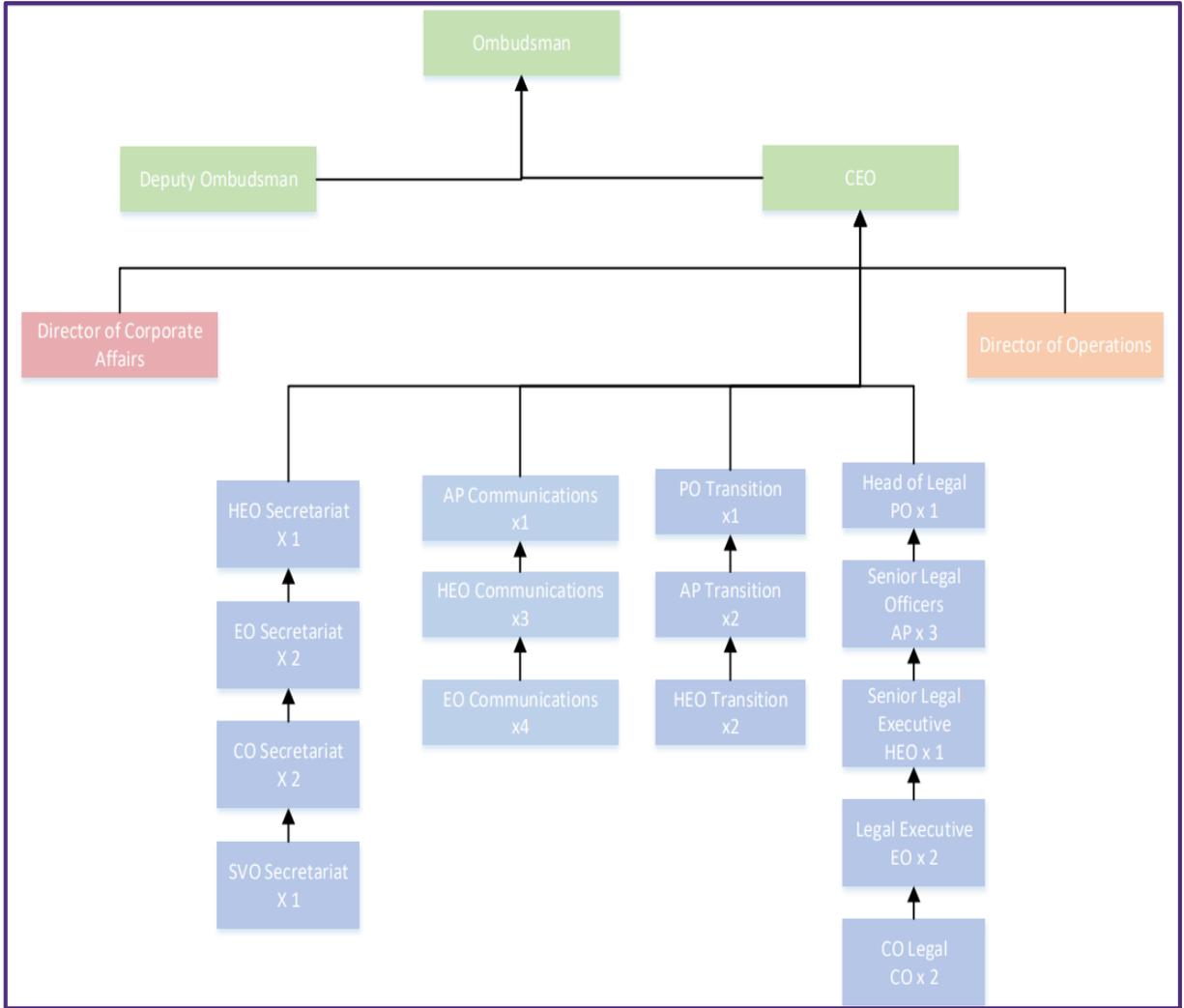
Proposed New Workforce Plan – Option 3

Grade	Corporate Affairs														Operations										Total	
	Ombudsman, Deputy Ombudsman and CEO	Corporate Affairs Director and Deputy Directors	Legal Unit	Communications Unit	Corporate Services	Finance	HR/Training	IT	Analysis, Policy and Research Unit	Secretariat	Quality Management and Outcome Review	Data Protection Unit	Governance Unit	Data and Research Unit	Transition	Investigations Director and Deputy Directors	Investigations Division	Case Officers - Admissibility	Intelligence	Triage Unit	Digital Investigation and Digital Forensics Unit	Specialist Support Services	Customer Contact	Child Protection		Protected Disclosure Unit
Secretary General (Replacement)	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Deputy Assistant Secretary (Replacement)	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Assistant Secretary (Replacement)	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Principal Officer	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	5	0	0	0	0	0	0	0	0	0	6
Assistant Principal	0	0	2	0	0	1	1	0	1	0	0	0	1	1	0	0	20	0	1	1	1	1	0	0	0	31
Higher Executive Officer	0	0	3	1	0	1	3	1	2	0	2	1	1	1	1	0	84	3	1	1	6	3	1	0	0	116
Executive Officer	0	0	0	3	0	2	2	0	1	1	2	1	2	1	0	0	40	0	0	3	0	3	2	0	0	63
Clerical Officer	0	0	0	0	0	1	2	1	1	1	0	1	0	1	0	0	13	0	0	1	0	1	0	0	0	23
Total FTE	3	0	5	4	0	5	8	2	5	2	4	3	4	4	2	5	157	3	2	6	7	8	3	0	0	242
Total FTE	3	48														191										242

Part 9: Proposed Organisational Structure

Organisational Structure

New Proposed Structure



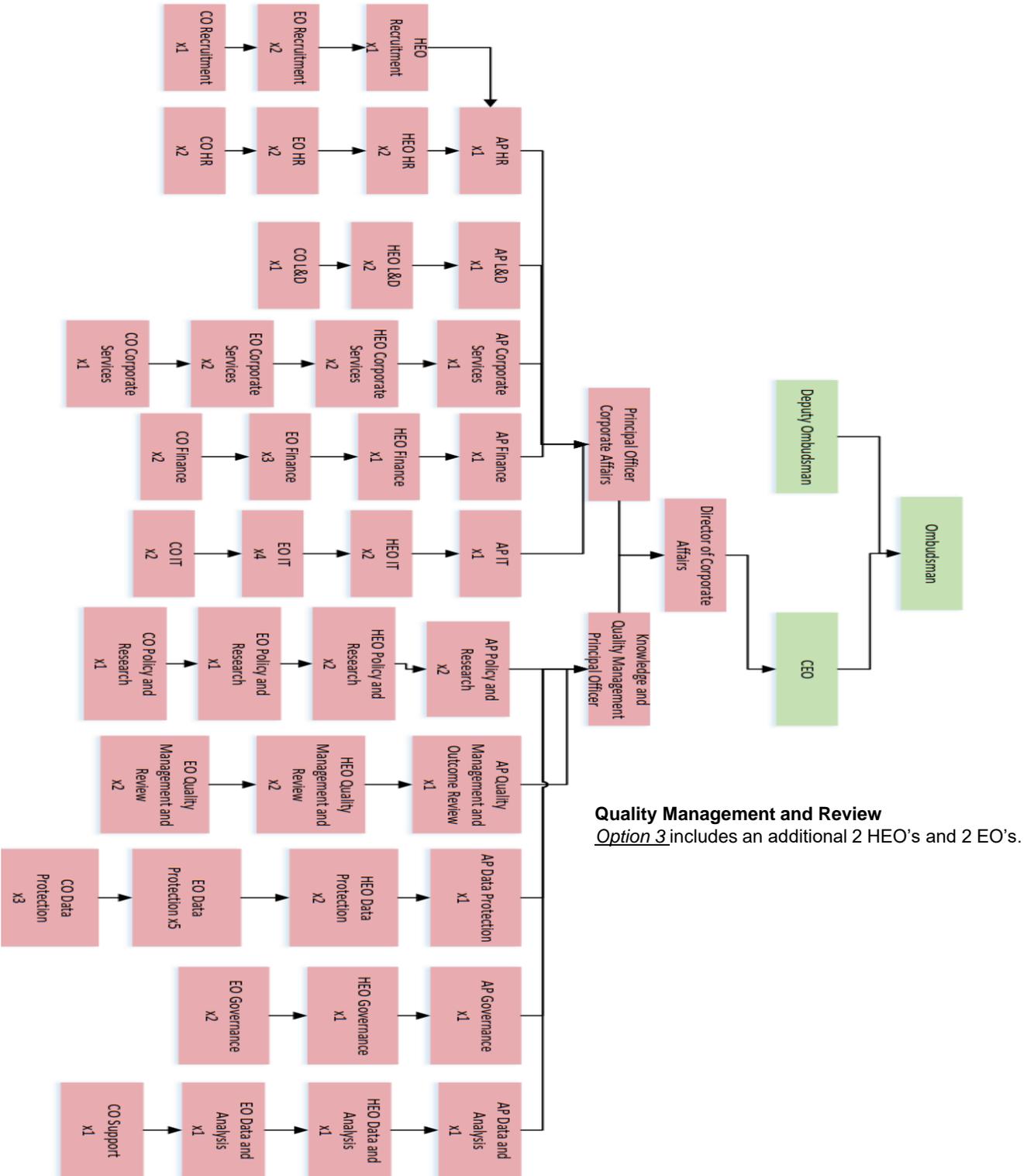
Legal Unit

Option 2 includes an additional 2 HEO's;

Option 3 includes an additional 1 AP and 2 HEO's.

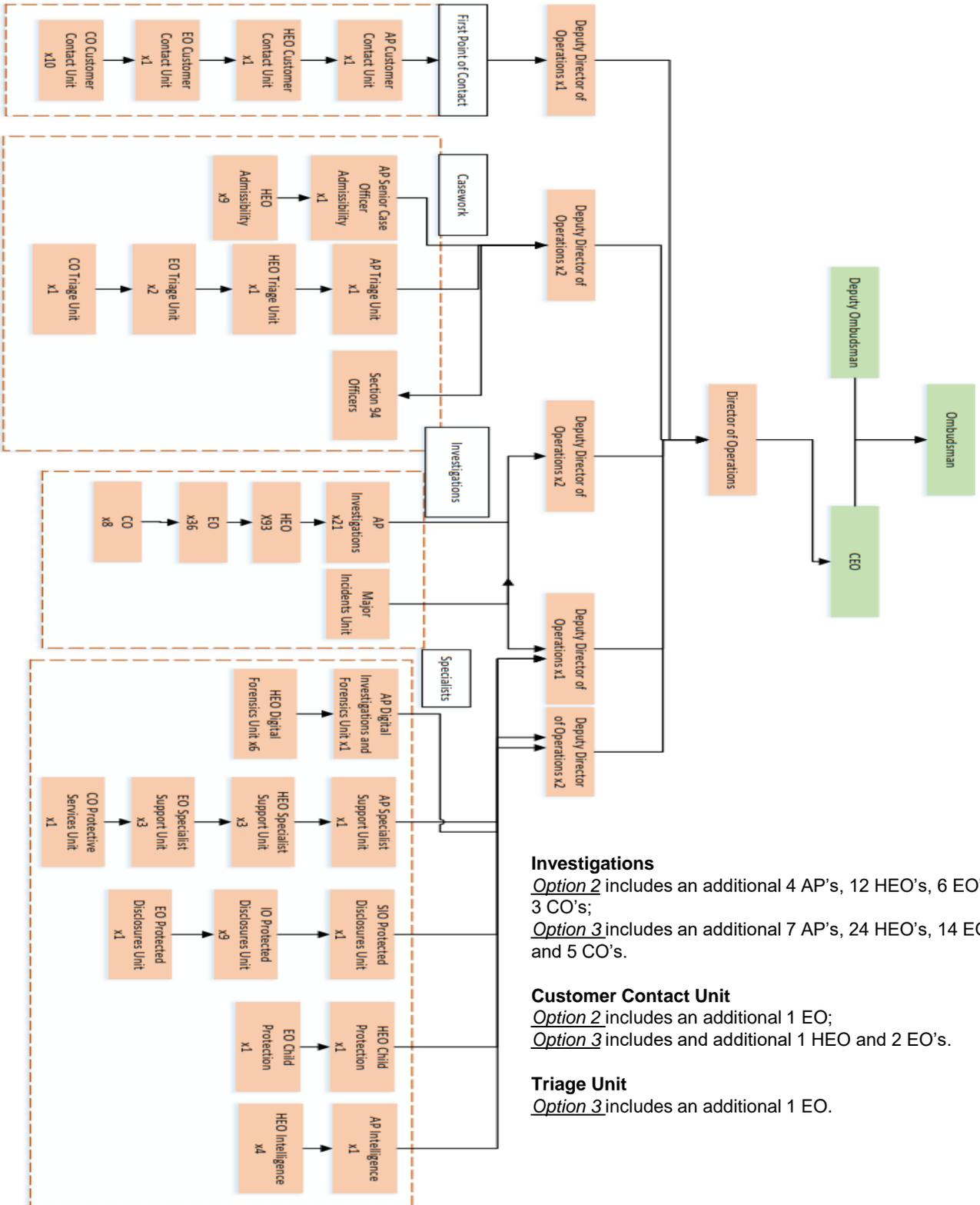
Organisational Structure

New Proposed Structure Corporate Affairs



Organisational Structure

New Proposed Structure Operations



Investigations

Option 2 includes an additional 4 AP's, 12 HEO's, 6 EO's and 3 CO's;

Option 3 includes an additional 7 AP's, 24 HEO's, 14 EO's and 5 CO's.

Customer Contact Unit

Option 2 includes an additional 1 EO;

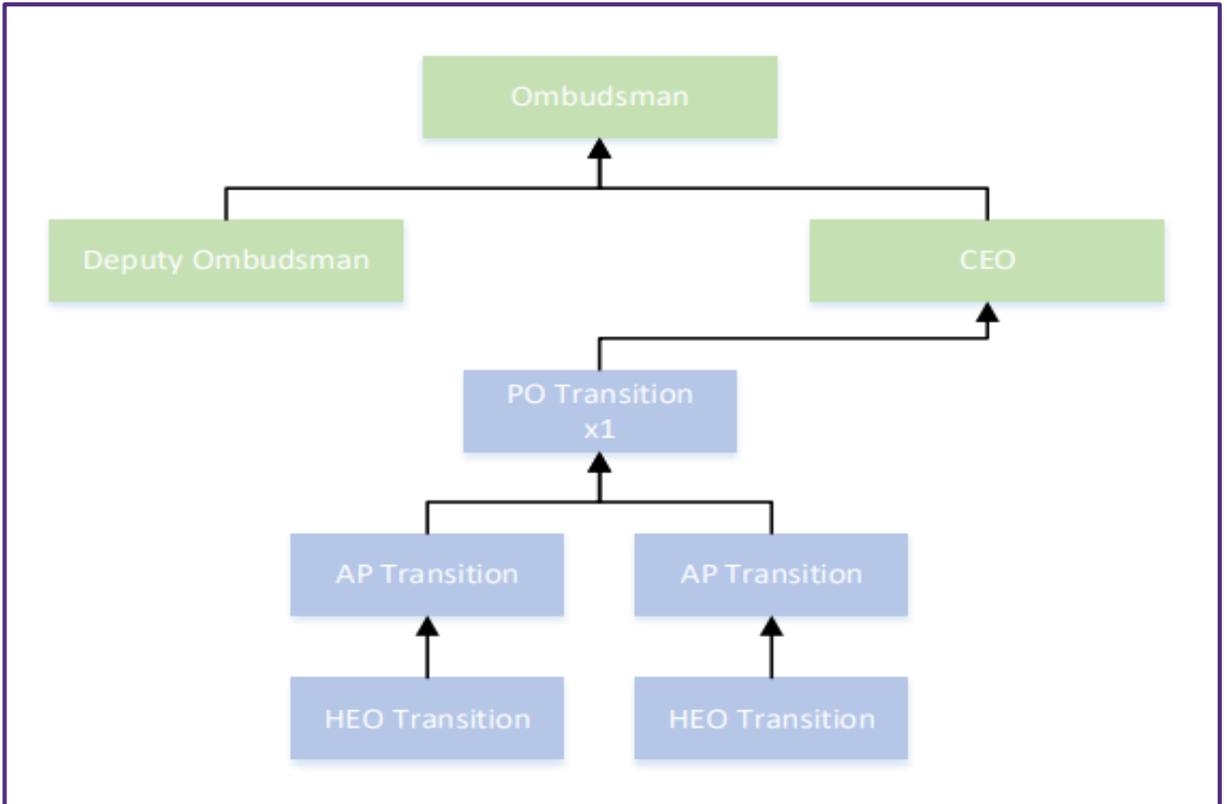
Option 3 includes an additional 1 HEO and 2 EO's.

Triage Unit

Option 3 includes an additional 1 EO.

Organisational Structure

New Proposed Structure Transition



Part 10: Summary of Recommendations

Summary of Recommendations

Best Practice Learnings from Benchmarking for GSOC

The outcome of our benchmarking process demonstrated that within the oversight, regulatory and ombudsman worlds, there are a vast range of remits under which these organisations operate. However, our work identified some key learnings which can be taken from each body in relation to how it achieves its outcomes and services the citizen:

- In respect of investigations, those organisations most comparable to GSOC have a much lower case per investigator number;
- Each organisation highlighted some of the Key Performance Indicators which they report on to show commitment to the citizen and ensure satisfying performance for stakeholders. It is important to note that some stakeholders raised that they have internal KPIs as well as public facing ones;
- Each of the organisations has varying levels of digital maturity;
- Each of the police oversight bodies believe it important to maintain a productive, professional relationship with the local police force;
- Not all of the police oversight bodies have an On Call system, some simply investigate complaints during the business week;
- Largely, the police oversight bodies have one head office with investigators travelling around the country by car or plane to scenes. This is with the exception of IOPC who have regional offices.

In summary, while none of the benchmarked organisations had an identical remit to GSOC, there are many learnings which follow from this benchmarking exercise and inform our recommendations.

Design Principles

Working with key stakeholders within GSOC we created a set of design principles we have used to help guide the organisation design and strategic workforce planning set out within this report. Those design principle are set out in Part 3 of this report above.

Proposed Workforce Plan

As set out in part 4 of this report above, and based on our in depth review of the current state of processes, systems, people, culture and leadership within GSOC, we have created a proposed workforce plan for the future Office of Police Ombudsman which includes an increase of headcount between **180 to 239**. This would increase GSOC headcount from 169 FTE to **346 - 405 FTE (including current vacancies)**.

We have provided three options based on a figure of 2,300 complaints per year (Option 1). However, given that we have been unable to secure accurate data on complaint numbers, we have therefore included optional staffing models based on the Office of the Police Ombudsman receiving an additional 250 complaints and a further 250 complaints. The breakdown of these FTE and the complaints which they relate to is explained in detail in the workforce planning section of this report.

The plan includes significant extra resources within both the Operations (**+137 – 191FTE**) and Corporate Affairs Functions (**+43 – 48 FTE**). The breakdown of grades of these new roles under the three options set out in this report are as follows:

Summary of Recommendations

Grade	Option 1 FTE Increase	Option 2 Increase	Option 3 increase
Principal Officer	6 FTE	6 FTE	6 FTE
Assistant Principal	23 FTE	27 FTE	31 FTE
Higher Executive Officer	88 FTE	102 FTE	116 FTE
Executive Officer	45 FTE	52 FTE	63 FTE
Clerical Officer	18 FTE	21 FTE	23 FTE
Total	180 FTE	209 FTE	239 FTE

Processes and Systems

A key dependency in the delivery of a fit for purpose future organisation, and also an assumption upon which our proposed workforce plan is based, will lie in a reform of the current GSOC processes and systems. In part 6 of this report above we have set out 13 major recommendations in relation to reforms of current operating models and processes, as well as recommendations in relation to digitalisation and two proposed new system implementations.

We recommend that GSOC treats this reform programme as a significant body of work in its own right and that this will form a key work stream within the overall transformation programme.

Skills and Capability Gaps

In Part 7 of this report we have also outlined our view of the current and future skill and capability gaps which we recommend that GSOC takes steps to remedy. These are required both to address current gaps, as well as creating the right skills and capabilities to set GSOC up for future success. Some of these skills exist in GSOC already, but we recommend enhancing the skillsets in the following areas:

Summary of Recommendations

Skills and Capabilities Development Areas
Investigator Skills: <ul style="list-style-type: none">• Interviewing• Forensic Extraction and Examination• Major Incidents• Intelligence
Data Analysis
Human Rights Expertise
Non-technical Skills: <ul style="list-style-type: none">• Communication and Public Affairs• Management and Leadership Development• Decision Making• Project Management• Business Planning• Stakeholder Engagement• Learning and Development• Risk Management
Recruitment
IT
Policy Development
Learning Needs Analysis to collect insights on key skills requirements in order to support the delivery of the learning strategy

We recommend that GSOC reviews its Estates Strategy in the light of the significantly increased headcount recommended in this report.

We also recommend developing a learning culture in GSOC, where the organisation functions as a knowledge driven one, with a focus on high performing staff and quality investigations

Implementation Plan

In Part 8 of this report below we have included a high level implementation plan which sets out a roadmap for the implementation of the restructure for GSOC, and also a task list showing proposed priorities, estimated effort and likely timescale for delivery. It should be noted that we have identified change leadership and culture change as a key dependency for GSOC in delivering this change programme. Separate to this organisational review, we have begun work with the Commissioners and Directors to begin to prepare the organisation's leadership style and culture for this transformation.

We have also made recommendations in relation to a Talent Acquisition Strategy in Part 11 below which should assist GSOC to rapidly upscale the organisation in line with the recommendations in this report.

Part 11: High Level Implementation Roadmap

High Level Implementation Roadmap

Quick Wins

We have set out below a high level implementation roadmap and plan showing a recommended approach for GSOC to carry out the organisational transformation programme. Planning and setting up the programme will be a significant project in its own right (including business cases to secure funding and procurement processes for contractors and other suppliers). Notwithstanding that, we have set out below a number of “quick wins” that GSOC can commence immediately which would facilitate a “fast start” in the transformation programme, and begin to demonstrate to staff and stakeholders alike that GSOC’s leadership is acting with pace and agility. These recommendations are:

- Leadership and Culture (Transformation Readiness);
- Decision Making;
- Communications; and
- On Call Arrangements.

Leadership and Culture (Transformation Readiness)

Although we have identified that change of leadership style and culture will be a long term programme, Grant Thornton have already started work with the current Commissioners and Directors in relation to leadership and culture in GSOC and how “Change Leadership” will be critical in delivering the organisational transformation. Key tasks within this will include: Leadership Alignment; Leadership structure governance and decision making, risk management, creating the skills and capabilities to lead change, and the appointment of the new senior management of Office of the Police Ombudsman.

Decision Making

Our review identified significant issues with how decision making happens in GSOC. We found that decision making is almost entirely aggregated upwards to the top of the organisation and this causes significant delays and inefficiencies in processes. We noted that the Commissioners have already begun to take steps to delegate decision making to the appropriate levels in the organisation, but this will require significant leadership and follow up to properly embed this. We have also made recommendations above in relation to training the appropriate staff in decision making as a skill, as well as better understanding their individual decision making authority. Again, we recommend that this could be run as a project in its own right with appropriate senior level sponsorship and progress reporting.

Communications

We noted from our extensive engagement with external stakeholders that there was significant criticism of what was perceived to be a lack of openness and communication on the part of GSOC. Many of these organisations would welcome the opportunity to become “trusted friends” for GSOC, and this could bring significant benefits, particularly in relation to enhancing the public opinion of the organisation. We noted that GSOC has drafted an external stakeholder engagement and communication plan, and we recommend that this is run as a project and sponsored and reviewed at Commissioner level.

High Level Implementation Roadmap

On Call Arrangements

Our review heard frustrations expressed over how the On Call team is resourced and run. The current process is that the on call rota is done by working unit, meaning all employees on call each time are based out of the same location. This can cause severe delays in On Call teams arriving at the scene of the investigations, if the team on call is based a considerable distance from the location.

We recommend that the on call teams are no longer rostered by working team, but that the rota is done with a combination of investigators from each geographical location on for each rotation. This will allow for investigation teams to have a wider spread of geographical locations that are easily accessible to them than if they were all based out of the same location. Our proposed structure for this would be that each on call team would consist of 2 investigators based in Cork, 2 investigators based in Longford, and 4 investigators based in Dublin rotating to be on call one week in every six weeks. We recommend that the On Call SIO continues to be rotational. Although this may mean that investigators are reporting to more than one SIO at any given time, we believe this is the most efficient way to service all locations throughout Ireland.

We also recommend that the on call team on rotation does the initial tasks for an investigation that may be outside of normal working hours, and then hands the investigation over to a team that is based in the office closest to the investigation. For example, if the on call team responds to a case based in the south-west region of the country, the On Call team will carry out the initial investigation tasks until the normal working hours resume, and will then pass the case to the investigations team in Cork. We recommend that this change could be dealt with expeditiously in order to demonstrate responsiveness and agility in GSOC leading change.

Currently within GSOC, all those involved in active investigations who have opted in to the on call rota receive an On Call allowance which is compensation for attendance during out of office hours, unsocial working hours and for the inconvenience of being called from home. The allowance is currently set at €11,322 for SIOs and IOs and €9,949 for AIOs.

In relation to the on call allowance, contained within the Section 172(5) of the PSCS 2022 bill, there is a commitment to the current staff that their terms and conditions will not change. As a result of this, we are proposing that those who currently have the allowance as part of their Terms and Conditions (or are sanctioned to do so) retain this. This amounts to a total of 57 employees who have the allowance. Going forward, we recommend that each of the employees who receive the On Call allowance are required to continue to subscribe to the On Call rota. It is noted that there are currently employees within GSOC who have chosen to 'opt out' of the allowance and the On Call rotation and this option would stay in-place.

We propose that new hires (with the exception of recruitment for posts that is already "in flight") are not in receipt of the allowance and as a result do not need to subscribe to the rota. We recognise that this may be challenging from a recruitment perspective however on the balance of needing to managing future resources as well as maintaining the promise made to current staff we recommend that it is the best option.

In relation to the on call procedure, we also recommend that the Office of the Police Ombudsman retain comprehensive records of call outs as well as hours spent on call outs to ensure compliance with the Organisation of Working Time Act 1997.

High Level Implementation Roadmap

Implementation Planning Overview

Grant Thornton has suggested a suite of recommendations set out above. In order to assist GSOC’s implementation of these recommendations, Grant Thornton has included:

- A suggested time scale for each recommendation;
- A suggested ranking of priority of each recommendation;
- An estimation of the level of effort of implementing the recommendation; and
- All of these may be subject to review and refinement during implementation.

Priority

Each recommendation has been rated on a priority scale of how critical it is to the future success of GSOC:

- **Low** – Helps to build a strong organisation however, is not critical.
- **Medium** – Important to the success of building a strong organization.
- **High** – Critical to the success of building a strong organisation.

Time Scale

Each recommendation has been assigned an indication of time scales, in terms of time needed for successfully implementing the recommendation.

- **Quick Win** – 0 to 3 months
- **Short Term** – 3 to 6 months
- **Medium Term** – 6 to 9 months
- **Long Term** – 12 months+

Effort

The suggested ‘effort’ rating is an estimation level of effort required to implement the various recommendations. In order to have a consistent approach to scoring the recommendations, a set of definitions was created by the Grant Thornton team, to rank the level of effort and impact accordingly. These criteria are set out in the table below.

Effort	Definition
	Minimal effort required to implement, and skills or processes to enable are available within the existing capabilities of the organisation. Could be implemented within weeks with little or no impact on capacity.
	Minor effort required to implement internally or with support from an external party. Could be implemented within 1-3 months with minimal impact on capacity.
	Moderate effort required with some potential support from external parties. Could be implemented within 1-3 months with some dedicated capacity and resources.
	Considerable effort required with recommended support from external parties, requiring one or more full-time resources to deliver, using some specialist skills. 3-6 months to implement.
	Significant effort required, requiring a team with specialist skills. 6+ months to implement.

High Level Implementation Roadmap

Theme	Recommendation	Priority	Effort	Timescale
Business Case and Sanction for resources	This activity will be critical to allow GSOC to right size the organisation and to set up for future success. Ultimately this will require Departmental approval (DoJ and DPER). Key tasks will include, completing and issuing the final Grant Thornton report to stakeholders, creating a business case for the new resources, and business case submission to DoJ and DPER for approval.	High		Short Term
Leadership and Culture Change	Grant Thornton have already started work with the current Commissioners and Directors in relation to leadership and culture in GSOC and how "Change Leadership" will be critical in delivering the organisational transformation. Key tasks within this will include: Leadership Alignment; Leadership structure governance and decision making, risk management, creating the skills and capabilities to lead change, external stakeholder engagement, and the appointment of the new senior management of GSOC.	High		Long Term
Process Design and Operating Model	A key enabler for the transformation of GSOC will be in amending existing, and adopting new processes based on lean principles. This will address existing issues in areas such as leadership and decision-making. Key tasks will include streamlining existing processes as well as new process design – both using lean principles, then testing and iterating processes before training end users, and going "live"	Medium		Medium Term
Organisational Design	Getting organisational design right will be critical in breaking down barriers in the new organisation and creating the optimal cross functional operating model. To do so, we recommend that GSOC commences by creating the new posts set out in this report, then once sanctioned, begin to align staff to the new structure, whilst testing organisational alignment and effectiveness, and iterating the structure as required. Once finalised the structure should continue to be reviewed regularly and iterated as required for optimal operational effectiveness.	Medium		Medium Term
System Implementations	We have recommended in this report the implementation of a new Case Management System and integration with SharePoint to help transform the operations within the investigation function. The process of replacing the Case Management has already begun and is at an advanced stage with business case approved and funding secured. GSOC should then run a procurement process including selecting vendor(s) and advisory services, and then proceeding with system implementation including system design, user testing, training etc.	High		Medium Term
Organisational Restructure	GSOC will also have to manage the restructure of the organisation and this will be a significant undertaking in its own right. Key tasks will include recruitment of the new senior posts including Ombudsman, Deputy Ombudsman and CEO, Statutory consultation with staff and representative bodies in relation to the implications of the restructure including potential redeployment to different roles and creation of new posts, as well as recruitment for a significant body of new roles and redeployment of any displaced staff.	High		Long Term

High Level Implementation Roadmap

Key activities	Month											
	1	2	3	4	5	6	7	8	9	10	11	12
Business Case and Sanction for Resources												
Complete and issue final Grant Thornton report to stakeholders	█	█										
Draft business case for submission to DoJ and DPER	█	█										
DoJ and DPER review and approval of resources			█	█								
Leadership and Culture Change												
Leadership Alignment	█	█										
Structure, Governance and Decision-making		█	█	█								
Skills, capabilities and culture for change			█	█	█	█	█	█	█	█	█	█
External Stakeholder engagement			█	█	█	█	█	█	█	█	█	█
New Leadership roles in post - handover										█	█	█
Process Design and Operating Model												
Build on process review recommendations using lean principles to streamline current processes			█	█								
New process design using lean principles					█	█	█					
Process testing (new and existing)								█	█			
End user training and go live										█	█	█
Organisational Design												
Creation of new posts including role profiles etc.				█	█	█						
Iterate and amend org structure based on process and job design						█	█	█				
Finalise, approve and issue new org structure								█	█	█		
Road test and iterate structure										█	█	█
System Implementation (CRM)												
Business cases and approval	█	█	█	█								
System procurement including vendor and advisor services				█	█	█						
System implementation including user testing, training etc.						█	█	█	█	█	█	█
Organisational Restructure												
Recruitment of new Ombudsman and Deputy posts			█	█	█							
Statutory consultation with Staff representative bodies				█	█	█	█					
Recruitment (Internal and external) for new posts						█	█	█	█	█		
Redeployment of any displaced staff									█	█	█	█

High Level Implementation Roadmap

Transformation Programme

In order to ensure a successful transition, it will be essential that GSOC and latterly the Office of the Police Ombudsman embark on a strategic Transformation Programme designed to maximise employee experience and maintain business continuity. It is essential that the organisation endeavours to provide Change Leadership as well as Change Management to navigate the challenge of change and to keep employees engaged with the process as it progresses.



So as they can achieve this, it is recommended that the Office of the Police Ombudsman dedicates the appropriate resources to both the internal transition team and to the engagement of external strategic partners who can provide advice, best practice and mentoring support throughout the process.

Resourcing Strategy

We note that one of the significant challenges for GSOC in the transformation programme will lie in the ability to recruit and train up a very significant number of resources to staff the new organisation (as set out in this report). Our view is that this is a significant programme of work in its own right and that it should be mobilised as a work stream within the transformation programme. Given the scale of the challenge we recommend the following actions to set GSOC up for success in this area:

- That GSOC seek approval to move their recruitment from PAS and run it in house, at least for the duration of the programme. We have made recommendations elsewhere in the report about GSOC's recruitment process, but having in-house ownership of this particular programme will be critical;
- That GSOC identify a suitably-experienced contractor or consultancy to outsource the programme to and to utilise their expertise in job design, employer branding and candidate attraction strategies, applicant management, candidate selection, and on-boarding as well as supporting Programme Office (PMO) activities for the transformation; and
- To consider the Estates footprint recommendations set out in this report. Attempting to recruit the volume of roles required in the metropolitan areas of the current GSOC offices is unlikely to be successful in an already candidate-led and saturated recruitment market. Recruiting for other new regional offices is more likely to be successful.

In terms of content of the Resourcing Strategy, we recommend that the following would form the key parts of the plan:

- Use the Skills Gap Analysis and Workforce Plan set out in this report to produce a list of new roles and create job descriptions for them;
- Create a Recruitment Strategy and Operational Plan (using consultants as noted above). Included within this will need to be the development of a strong employer brand and attraction strategy;

High Level Implementation Roadmap

- Plan for retention and development – use the “Sports Team” model where you buy in the odd star player, but the success of the club is built on the strength of the talent coming through the “Academy”. Investing in retention initiatives and talent development will be critical;
- Plan for succession. Identify key dependency roles and create a succession plan for each, noting what development needs are required for identified successors, and have a plan in place for each of them for their development;
- Utilise technology to maximise the efficiency and effectiveness of the recruitment process. At a minimum this would involve applicant handling applications and could form part of the contractor requirements noted above; and
- Regularly track progress against the resourcing plan (as a work stream within an overall transformation programme) and iterate and amend it to suit the changing circumstances as required.

Appendix 1: Benchmarking Supplementary Information

Office of Police Ombudsman for Northern Ireland

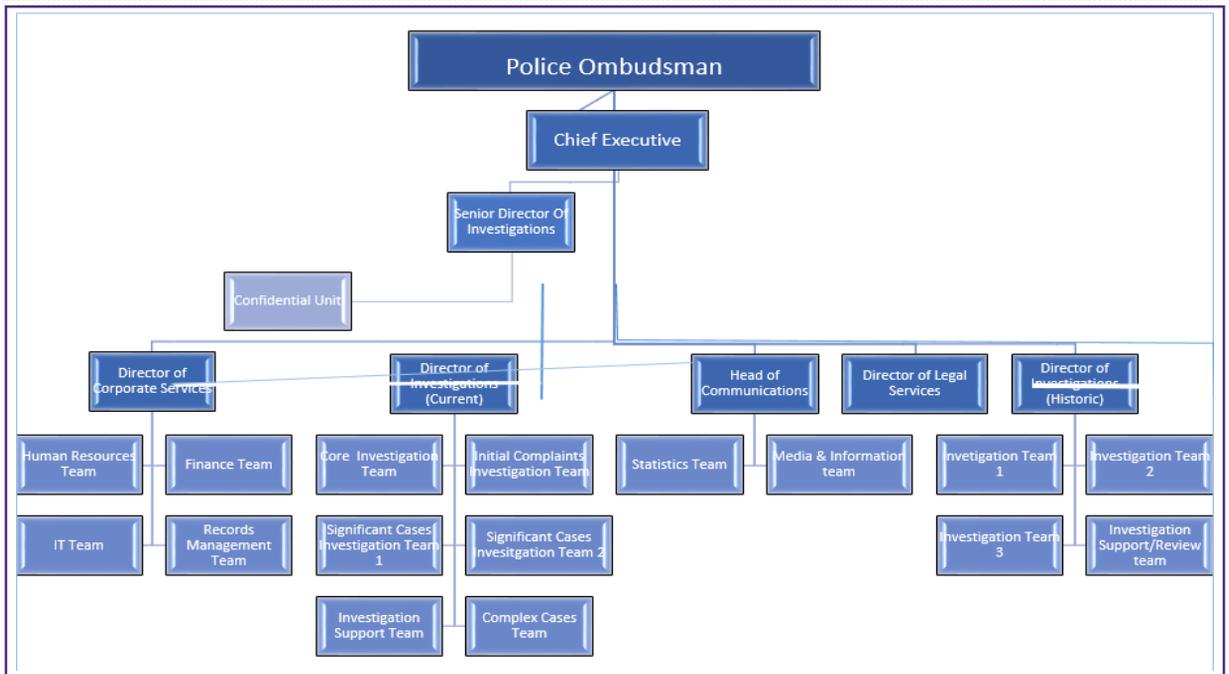


Illustration of department structure within Police Ombudsman Northern Ireland

Remit

The Police Ombudsman's Office in Northern Ireland (PONI) provides independent, impartial investigation of complaints about the police in the jurisdiction. Ultimately, their remit is to inspire confidence in the police complaints system. They look at evidence and decide whether or not police officers have acted properly. For example, some of the areas investigated by PONI are as follows:-

- Officers who have failed to conduct proper enquiries;
- Officers who have been found to have used excessive force;
- Officers who have been rude or aggressive; and
- Officers who have acted inappropriately in other ways

They also told us that they investigate complaints about some civilian members of police staff. An example of a civilian member of staff who fall into the remit of PONI would be those performing custody and escort services.

PONI deal with complaints relating to a number of bodies which are listed as follows:

- The Police Service of Northern Ireland;
- National Crime Agency Officers in Northern Ireland;
- Belfast Harbour Police;
- Belfast International Airport Police;
- Ministry of Defence Police in Northern Ireland; and
- Immigration Officers and Some Customs Officials in Northern Ireland

Office of Police Ombudsman for Northern Ireland



Systems & Processes

PONI shared with us that they are currently going through significant change in relation to their systems and processes. They told us that at this point in time, they do not regard the organisation to be 'digitally mature' and that currently they are endeavouring to procure a new Case Management System. They intend to go to the market to procure this before the end of the financial year as they believe their current system to be out of date. In relation to reporting, the organisation has statisticians attached to it from the Northern Ireland Office of Statistics who can extract 'more or less' everything that is required. However, the Police Service of Northern Ireland have indicated they would like to see more thematic information from PONI going forward.

They also told us that all historic investigations are conducted on a system named CLUE which is an entirely on premise solution therefore those who work within the historic investigations function cannot work from home.

Operations

PONI operate as a non-departmental public body. They describe their relationship with the Department of Justice in Northern Ireland as being a 'dotted line', in that the department does not have an oversight role with PONI but the two organisations do cooperate in certain circumstances. For example, the Department do provide an element of financial management assistance, as well as funding to PONI.

The Police Ombudsman is appointed by the First and Deputy First Ministers in Northern Ireland. The organisation does engage with the Policing Board, however, this is not an oversight relationship. PONI reported having a collaborative and functional relationship with the PSNI, however they noted that this depends on the individual personalities and relationships of those working with them at any given time.

There is an element of oversight provided by the Ministry of Justice in the United Kingdom as they can direct the criminal justice inspectorate to carry out specific inspections. In relation to organisational performance, PONI release an annual report which fulfils their statutory duty to report on specific statistics.

The organisation works to fulfil a number of Key Performance Indicators (KPIs) each year. They publish a business plan every three years as well as a more detailed annual business plan. They shared with us that they commit to the public on things they believe to be 'fundamental' such as when progress updates will be available relating to investigations and believe this to be important to maintain a positive relationship with the public. For example, they told us they endeavour to complete 60% of Category B investigations within 110 business days. Categorisation of cases will be discussed further in the 'Investigations' section of this report.

When it comes to accessing legal advice, those we spoke to within PONI shared with us that currently they have four in-house lawyers and that the current ombudsman is keen to increase this. Additionally, they shared that they regularly instruct senior legal counsel externally to support the work of their legal function.

In relation to cars, the organisation told us they have a total of five cars in PONI. They shared that the cars are leased and that the organisation does not own them. They also noted that their cars do not have blue lights or signage. Furthermore, they said that the investigators generally use their own cars and claim expenses. The contact interviewed noted that they used to have a larger transit van which, in his belief, was a useful resource for call outs as it was easy to do work on the way to and from a scene, as well as having signage which they could roll out and attach to the side of the vehicle.

Within PONI there is both an Ombudsman and Chief Executive as well as five core departments which are as follows:

- Corporate Services
- Current Investigations
- Historic Investigations
- Legal Services
- Communications

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In addition to these there is a Confidential Unit which reports to the Senior Director of Investigations.

Investigations

Structure

Investigations within PONI are led by a Senior Director of Investigations. Reporting into this role are the Confidential Unit, the Director of Historic Investigations and the Director of Current Investigations.

Historic investigations are currently conducted on the 'secret network' of PONI which is the CLUE system. This solution is entirely on their premises which means that those involved in historic investigations cannot work remotely, they must complete their work on-site. The organisation shared with us that throughout the past ten years, legacy investigations have taken up arguably a 'disproportionate' amount of time though they believe it to be an important part of their work. Furthermore, there is currently a bill going through United Kingdom parliament which would remove legacy investigations from the remit of PONI.

Currently, the Historic Investigations Unit has three investigations teams within it as well as one investigation support/review team.

The Current Investigations unit is currently split out into the following six teams:

- Core Investigation Team;
- Initial Complaints Investigation Team;
- Significant Cases Investigation Team 1;
- Significant Cases Investigation Team 2;
- Investigation Support Team; and
- Complex Cases Team.

PONI shared that they operate a triage system whereby the Initial Complaints Investigation Team triage complaints and make decisions on whether they are passed to the next investigations team for a full investigation. The organisation told us that they receive in the realm of 3,000 complaints annually and that upwards of half of these are closed by the Initial Complaints Investigation Team before they reach the next team. Managers or Investigators who are in receipt of cases will decide whether to pursue them on a disciplinary or criminal basis.

The organisation said that the Significant Cases Investigation Teams will receive any investigations where a death has occurred. In this context, that prior to 4-5 years ago, there was one Significant Cases Investigation Team within PONI, however at the time this team was overwhelmed with cases and so the Senior Director of Investigations decided to create a second team who could also investigate significant cases such as deaths.

PONI noted that currently, each of the investigations teams has specific administrative support assigned to their team. There have been internal discussions around whether a shared Office Manager would work better to provide this support however, this has been met with much resistance and has not yet been trialed or piloted within the organisation.

Furthermore, we were told that the current Senior Director of Investigations champions policy writing within PONI. For some time, the organisation has hoped that policy writing would reside, within the remit of each individual team, however, due to investigations taking priority in the day-to-day work of these individuals, they have found it a challenge to find time for policy-writing or research. However, following the creation of the Investigation Support Team, the organisation believes this team will lead the quality assurance strategy, thematic reviews and how to manage effective communication with police officers and complainants.

Communication

The investigations teams endeavor to provide complainants with an update on their case every six weeks. In relation

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to the media, the organisation will issue press statements or public statements following the conclusion of an investigation of a particularly serious matter. They are reluctant to update or communicate anything publicly whilst an investigation is ongoing. PONI told us that the Head of Communications alongside their two Deputy Heads of Communications are responsible for pushing out messaging around investigations. They said that up until this point these reports have been written by investigations teams and approved by senior management. They also indicated there is a specific 'red team' who, particularly in relation to legacy matters, will review and scrutinise these statements. The 'red team' is led by the Police Ombudsman.

Categorisation

PONI shared with us a document detailing categorisation policy for their cases. They shared that once cases reach the investigations phase, they must be designated Category A, B or C in accordance with the criteria for each of these categories. Following this, there is a bi-monthly case management review process which involves meetings with the Ombudsman, Chief Executive, Senior Director of Investigations, Director of Investigations and individual team Senior Investigating Officer (SIO) and Deputy SIOs (DSIOs). In addition to this, the Case Handling System is also populated with the appropriate categorisation to aid searching for cases per category. Once the case has been categorised and the relevant staff member has inserted their categorisation rationale into the progress log, the case will then be allocated to the investigating officer.

The following criteria is used to separate the cases into the relevant categories

Category A are cases which have been referred to PONI by a member of the public or Chief Constable concerning loss of life, very serious injury, serious sexual assault, sexual misconduct or inappropriate relationships, discharge of a firearm and any other member deemed relevant by the director.

Category B are cases which have been referred to PONI by a member of the public or Chief Constable concerning the use of attenuated energy projectiles, use of TASER, sexual assault, allegations of force causing physical injury (such as excessive bruising, broken bones, breaking of the skin or significant mental trauma), theft or fraud allegations, hate crime, neglect of duty linked to serious crimes, neglect of duty failing to protect members of the public, improper disclosure of information, driving offences and any other member deemed relevant by the director.

Category C are cases deriving from a public complaint where there has been allegations of an officer being uncivil or rude to a member of the public, biased or unfair behaviour, force causing minor injury, neglect of duty on administrative issues, neglect of duty linked to less serious crimes (minor road traffic collisions, common assault, criminal damage or where the alleged neglect in duty resulted in a failure to detect matters in a timely manner), need for clarification of police procedural issues and/or policy, allegation of breach of Police and Criminal Evidence Act, minor driving or parking offences and any other matter deemed relevant by the director.

Following the categorisation of cases, the document sets out that cases should be continually reviewed by the IO and their line manager, as well as the SIO and Senior Management Team. If an IO believes a case categorisation should be reviewed, they are told to escalate this to the DSIO. In the event of a case being re-categorised, the document indicates that the IO holding the case should discuss with their line manager if they should retain it or if it needs to move to another team dealing with the way the case is now categorised.

Specialist Investigations

Within PONI we were told that there are a number of specialist capabilities which have been developed and are listed as follows:

- Capability to screen a mobile telephone that is recovered to obtain information on it but they shared their belief that their capabilities are quite basic;
- Capability to perform open-source research on Social Media;
- Significant case teams have built up experience to investigate inappropriate relationships;
- Various individuals within the organisation are trained to different levels of suspect and witness interviewing;

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-
- Ability to interview children; and
 - Trained and accredited analysts working in the confidential unit.

PONI also shared with us that where they require specific skills that they do not have in-house; and that they procure these skills externally. This has happened in the past in respect of legal advice, digital forensic investigations and areas of very specific policy.

Resourcing

PONI currently have 81 staff working within the Current Investigations Unit, ten staff working in the Confidential Unit, and 25 Staff working in the Legacy Investigations Unit.

They shared with us that, due to COVID-19, they have a backlog of cases as well as a significant number of complaints following the end of the pandemic. They shared that ideally, they believe there should be 30 category A cases at any given time, 15 category B cases and 20-22 category C cases.

Body Worn Video

PONI highlighted to us that although they experienced an initial reduction in complaints post the implementation of body worn cameras in the PSNI, they actually went back up again after about 6 months and continue to rise to close to pre-implementation levels.

Training

PONI discussed a number of employee training programmes which are currently in place in the organisation. They shared with us that they offer a basic level of investigatory training across the board for all investigations employees and have introduced a strategy for all trainee investigators to go through 'Professionalising Investigations Programme (PIP)' Level One. 'Criminal Investigations Department (CID)' employees would receive PIP Level Two and SIOs would be in receipt of PIP Level Three.

Additionally we were told that PONI offer specialised training to certain employees in relation to advanced interviewing, family liaison and other specific areas.

Resourcing

In relation to building a sustainable talent pipeline, we were told that the organisation tends to bring investigators in as trainees. They indicated that although this is resource intensive, they see lots of progress coming from people who come in at this level. They shared with us a number of examples of people who joined a number of years ago, who have progressed to senior roles within the organisation.

They noted that they know there will always be a need for a degree of direct recruitment in specialist areas, however, as an organisation they like to see trainees progress through the organisation. They shared that specifically at Deputy SIO level, promotions are all done internally.

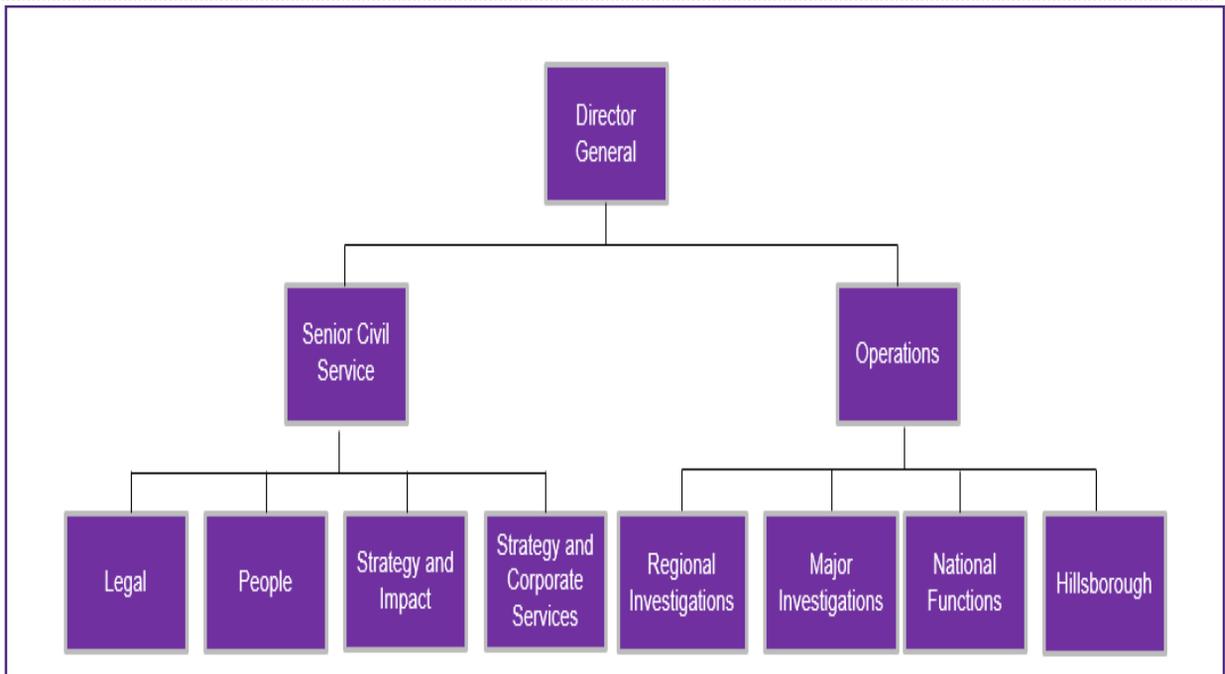


Illustration of department structure within the Independent Office for Police Conduct

Remit

The Independent Office for Police Conduct (IOPC) oversees the police complaints system in England and Wales. They investigate the most serious matters including deaths following police contact. Additionally, they set the standards by which the police should handle complaints made against them. Finally, the IOPC influences changes in policing through themes and learnings which arise through the course of their work.

The organisation carries out reviews and appeals on complaints made against the police where the complainant is unhappy with the outcome of the complaint or how it has been handled. Furthermore, in the most serious cases, whether or not an allegation has been made, the IOPC can investigate this.

In addition to investigating and reviewing complaints made against police forces, the IOPC also oversees the complaints system for the following organisations:-

- HMRC;
- The National Crime Agency; and
- Gangmasters and Labour Abuse Authority.

Finally, the IOPC plays a role in developing and inspiring public confidence in policing to ensure accountability and spread best practice and high standards of customer service.

Systems & Processes

IOPC shared with us that they have significantly digitalised their Learning and Development processes within the organisation and have found this to have added efficiencies to learning processes within IOPC. Following the creation of a satisfactory business case, the organisation procured a Learning Management System.

IOPC have their own team of in-house training designers who design and produce learning which is then loaded on to the Learning Management System. From here, the Learning

Management System can be used to track training completions including training for investigators as per requirements from the UK Government.

The organisation said that this system is used to train employees throughout the organisation, not just within the Investigations teams.

In 2021, the IOPC said in their business statement that they intend to start a project to procure and implement a new case management system. They shared their belief that that a new Case Management System will mean investigators can record information more efficiently which in turn they hope speeds up the investigative process, and provides better data collection, improving the quality of the information and knowledge that they can share to improve policing. They also said they believed it would allow them to publish more information about their work so that they can be subject to scrutiny and held accountable for our performance.

Operations

IOPC shared with us that they are an entirely independent organisation. However, they noted that while they set their own targets, their business plan needs ultimate sign-off from the Home Secretary. They also report performance on their website, including publishing a table which illustrates how they are performing around timeliness and key processes.

As an organisation, they indicated that they identify 'key concerns' to focus on. For example, we were told that in recent years a key concern for IOPC had been timeliness of investigations which they reflected was due to a lack of funding within the organisation. However, they also shared with us that recently they are 'moving to a more intelligent way of thinking about volume' whereby they endeavour to focus on impact and those investigations where they believe the outcome will make the biggest impact.

They also shared that they are currently doing work internally on how to achieve greater quality standards and allowing themselves to be more open to challenge. They reiterated their priority to maintain their independence but recognised the importance of giving people the opportunity to challenge in certain instances. They shared that they are keen to move away from the current 'basic' KPIs they use to measure performance and move to something more sophisticated.

Furthermore, when we met with the organisation they shared that they have approximately 1,000 employees currently. They explained that the organisation is led by the Director General and has two separate 'arms'; one of which is led by a Deputy Director General and is referred to as 'Senior Civil Service' and the other which is led by two Directors and is referred to as 'Operations'. Within each of these 'arms', the following teams exist:

- Legal;
- People;
- Strategy and Impact;
- Strategy and Corporate Services;
- Regional Investigations;
- Major Investigations;
- National Functions; and
- Hillsborough.

Currently the IOPC have offices in London, Cardiff, Birmingham, Wakefield, Manchester and Warrington (dealing exclusively with Hillsborough investigations). They shared that they are not at full capacity in all of their offices following the COVID-19 pandemic and as a result are reviewing their estate footprint.

Investigations

Structure

Reporting to the Operations Directors there are four Investigations Units, each with a number of teams within. The teams are set out as follows:

- The Regional Investigations Units have a Director overseeing each region. Each regional unit covers police forces and investigate complaints on a geographical basis;
- The Major Investigations Unit is overseen by a director and includes specialist investigators for elements such as intelligence and digital specialists etc.;
- The National Functions Unit which has a Director, a casework team, an assessment unit, a customer contact centre and an admin hub; and
- There is a unit specifically dedicated to dealing with Hillsborough Investigations.

IOPC shared with us that once a case is referred to them, they operate a scoring system which decides whether or not the case is one that the organisation would be expected to take on. Following a decision to take a case, IOPC told us they will appoint a lead investigator who sets the strategy for approaching the case. This, they said, includes making a decision on the severity of the content within the case and that the lead investigator will have legal advice on hand to help them. The lead investigator is responsible for day-to-day decision-making within the case.

Our contact went on to say that once a lead investigator gets towards the end of a case, a separate decision-maker (likely to be a senior manager within the organisation) will decide whether a complaint will be upheld, and whether or not the file will be referred to the Crown Prosecution Service. The organisation shared that at this stage they will be starting to identify lessons learned and whether they can provide wider learnings on the issue at hand.

It is important to note that the IOPC stated, that in certain instances, senior managers are solely spending their time making decisions. An example of this is that a senior manager within the organisation is seconded full-time to make decisions about the Hillsborough Investigations.

Communication

The IOPC shared with us that in relation to updating victims and subjects of complaints, they will provide an update to victims or their families and other interested parties every 28 days, whether or not there is a material update to give. This is a statutory requirement which the lead investigator is responsible for. At the beginning of the case, the IOPC told us that they will liaise with the interested parties to confirm the method of communication they would like used when receiving updates. The organisation will endeavour to honour these preferences insofar as is possible.

The organisation shared that where there are particularly traumatic cases, they will deploy family liaison officers to help the family to process updates and address questions they may have.

In relation to public-facing and media communications, IOPC told us that they do not disclose very much when a case is ongoing as they believe this is paramount to protecting the investigation. However, in appropriate circumstances the organisation reflected that they hold community meetings to reassure people they are making progress with the case.

The organisation shared that they have a 'relatively small' communications team which they reflected they believe is too small for the level of work required to maintain a public profile. This team supports those within the organisation who are doing media work. They told us that where someone is doing an interview, the communications team will come with them or brief them for the appearance and that they also write press releases in collaboration with the operations professionals in the organisation.

The contact we spoke to reflected that the organisation is not 'out there' enough expressing the IOPC's position on various topics and that they intend to develop 'position statements' which are intended to steer the public on the IOPC stance on certain issues.

Specialist Investigations

When we spoke to IOPC they shared with us their belief that to date they have not managed to develop enough specialist capabilities in-house. However, they said that developing more specialist investigations teams is a goal for the organisation currently. As such, they shared that they have begun to develop a small number of specialised units for example the digital evidence unit. They also told us that they have a Major Investigations Directorate which are dedicated to major cases.

Further to this, our contact told us that they have developed subject matter networks which are multi-disciplinary, cross-organisation groups who focus on developing particular areas of expertise such as violence against women and as such can input into cases of this nature.

It is important to note that on the subject of specialised investigations teams, our contact reflected that although it helps to have a team who develop knowledge and expertise in a particular space, it is also important to consider the mental health implications on staff as some cases are particularly brutal therefore the organisation endeavours to ensure people have a broad spectrum of cases to work on.

On Call Provisions

IOPC shared with us that they have both a day response and out of hours response to calls. They indicated that this covers the entirety of England and Wales. They told us they will have both a lawyer and a member of the communications team available out of hours. Additionally, they said they will have managers and investigators on standby to allow for a national support function, this includes staff throughout the country who can be deployed locally if needs be.

In relation to On Call teams 'handing off' investigations once the core team is back in the office, the team at IOPC told us that generally the local office will keep the case however it may not necessarily be the individual investigator. In addition to this the organisation endeavours to implement an element of 'national tasking' whereby they move casework around however they acknowledge that there are certain cases which need to be addressed regionally.

In relation to the provision of On Call allowances, the organisation shared with us that different allowances are allocated for different types of work however this continues to be a point of negotiation with trade unions as the allowance is not high. While they do get time in lieu in certain instances, the organisation shared that they struggle with retention at the lead investigator grade as they believe their salaries are no longer competitive.

Resourcing

IOPC shared that currently investigators each hold 2-5 cases.

Body Worn Video

IOPC shared that they do not believe body worn video impacts admissibility. They shared their view that they prefer to decide on the referral form solely. They also highlighted that they believe body worn video requires a particular skillset and that not all investigators are able to do this. For example, that where there is body worn video as part of an investigation, it requires the investigator to sit and watch granular content for hours and highlighted that they believe this is a specific skill.

Training

We spoke to the Head of Learning and Development within IOPC who shared that there is a People Directorate within which three Heads of Unit report: Head of Organisational Design, Head of Learning and Development and Head of Talent.

Within the L&D team there are a number of specialisms. These include an Investigations Delivery Team who deliver all accredited training in-house, a Digital L&D team who are responsible for the aforementioned LMS and others. The team works on a consultative basis, designing annual training programmes based on the projected needs of the organisation, rather than waiting for someone to come to the requesting specific training. The team works more to solve problems that exist by 'prescribing' training which may work to solve the issue.

In relation to trainee investigators, the organisation told us that they bring on trainees on a two year contract at which stage they would expect they would become accredited investigators and move up to investigator grade.

The Organisational Development team currently produce and deliver management and leadership training within the organisation which anyone who is in a position where they may be required to manage people must do.

The L&D team consists of 30 staff in total.

Resourcing

In relation to building a sustainable talent pipeline, the organisation stated that they have had 'mixed success' when hiring people at more senior levels. They shared that 25% of investigative staff are ex-police and that this is something they review frequently as they do not want the investigations team to be entirely made up of ex-police from a public perception perspective.

They noted legislation requires that the IOPC Director General cannot be ex-police.

Police Investigations and Review Commissioner

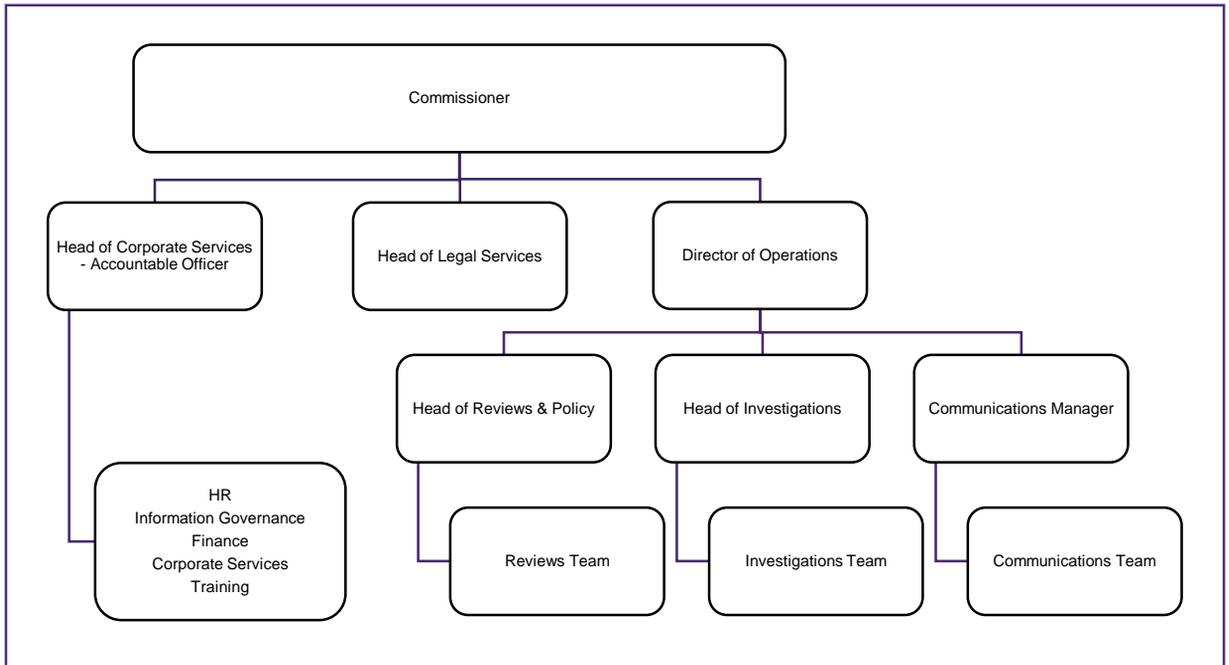


Illustration of department structure within the Police Investigations and Review Commissioner

Remit

The Police Investigations and Review Commissioner (PIRC) conduct investigations regarding incidents involving the police in Scotland as well as providing an independent review function over how the police handle complaints from the public.

They aim to inspire public confidence in policing through providing scrutiny as well as supporting lessons learned to improve the standard of service the public receives.

The PIRC can investigate a number of core areas which are listed as follows:

- Incidents which involve the police when directed by the Crown Office and Procurator Fiscal Service. This would include serious investigations such as deaths in custody and allegations of criminality;
- Incidents involving the police when requested by the Chief Constable or Scottish Police Authority (SPA) which may include serious injury of a person in custody, death or serious injury of a person following police contact or the use of firearms by police officers;
- Allegations of misconduct by senior police officers above the rank of Assistant Chief Constable (ACC) and above when requested by the SPA; and
- Relevant police matters which the Commissioner considers are in the public interest.

Systems & Processes

The organisation shared with us that they currently use Scottish Government systems. They believe they have made substantial progress in the past five years in relation to digitalisation.

For example, our contact reflected that five years ago the organisation used a lot of spreadsheets, so much so that they needed an admin team to help keep the spreadsheets up to date. However, now the organisation has an HR system, a system to manage flexi-time and a cyber awareness process in place. Therefore they believe they have made significant progress and now feel as though they can bring in new tools if they are needed.

Police Investigations and Review Commissioner



They noted that it is difficult to track the impact of greater digitalisation on FTE numbers as so many factors have impacted these in the past number of years. However, they shared that they have seen through making use of technology that investigators are required to be on the road less. They remarked that although the workload has increased, they have not had to increase their fleet or cars or the associated mileage.

The organisation also shared with us that the investigations teams use CLUE 3 to manage their investigations and can use this to log evidence and witness statements. They also referenced reporting packages which they hold on their internal network. In addition to this, while they said investigations officers manage their own investigations within the CLUE system, there is an admin team whose role it is to provide clerical support and work with them to conduct a quality assurance process which insures investigations reports are standardised and consistent.

Operations

PIRC shared with us that they have a Commissioner who is appointed by the Scottish Government. They noted that this person cannot be an ex police officer. Their strategy is determined by senior managers within the organisation. They begin by determining their operating plan and then report that to the audit and accountability committee. Interestingly, they shared that due to their being in a public consultation regarding the future of PIRC currently, they decided not to produce a strategic plan this year.

In relation to Key Performance Indicators, the organisation shared that they have timescales relating to complaints handling, reviews and investigations which they have to adhere to. However, they did note that when they are awaiting information from another party such as Police Scotland, they pause the clock and this time is not considered as part of their KPI.

PIRC shared with us that they have a 'very good' relationship with Police Scotland. They noted that their approach to their work is to make it about learning and improvement. They said they want to improve confidence in policing and do this through asking 'how do we ensure that the wheels don't come off next time?' They conceded that they know there are times when they should be critical of Police Scotland when things go wrong, however stipulated that where there is no criminal investigation they try not to 'point fingers' at individuals. They reflected that they believe their relationship with Police Scotland to be non-confrontational.

PIRC is made up of 3 divisions which are as follows:

- Corporate Services;
- Legal; and
- Operations

PIRC told us that they are based in Hamilton and that while they don't have regional offices, they use Scottish Government Offices as a base when they need a more local option. They said that they are currently on the Scottish Government network and as such can access their computers via Scottish Government Buildings.

Investigations

Structure

Investigations within PIRC are led by a Head of Investigations. The Current Investigations unit is currently split out into the following 3 teams:

- Investigations;
- Reviews & Policy; and
- Communications

Police Investigations and Review Commissioner



PIRC shared with us that they have a Head of Department who has four Senior Investigators reporting to him. In addition to this, there is an Assessment Unit, a Forensic Unit (who also deal with digital recovery of evidence) and an Administration Unit. There are a total of ten Investigations Teams who sit under the Senior Investigation Officers (SIOs) with each of these teams having a deputy SIO in charge of them.

In relation to making a decision on whether not to investigate a complaint, our contact shared that it is the Head of Unit who decides. The Assessment Unit where complaints are assessed has two Deputy SIOs who run it.

Communication

The organisation has a communications team with two members of staff who deal with enquiries from the Media. They said that they do not proactively put out media statements, however they prepare 'if asked' for, a line for each investigation which consists of a short narrative that can be given to the media in the event they are asking questions about a particular complaint or investigation. The organisation shared that while they are unable to publish crown instructed investigations, they can publish ones which have been referred by the police and do so on the website once the case is complete.

In relation to communicating with parties which are interested in the case, PIRC speak to complainants very early on in an investigation and are transparent with them if they believe the investigation will take a long time. Furthermore, they said that they have family liaison officers who stay in contact with complainants in certain circumstances.

Categorisation

PIRC shared with us that they operate a categorisation strategy for both reviews and investigations. They said that the majority of complaints initially go to Professional Standards. They believe this to be impactful as their data shows that 43% of complaints can be resolved by an apology letter so this is efficient.

In relation to reviews, PIRC stated that the public must come to them within three months of getting a response from the police. Following this, they determine whether the complaint is an employment or criminal matter before requesting papers from Police Scotland. It is at this point that the SIO will categorise the case per the following categorisation strategy:

Category A refers to major investigations or complaints which generate significant interest. This will trigger an associated response that normal staffing levels are not enough to keep pace with the investigation.

Category B refers to an investigation where it may be apparent what happened but the enquiry or securing evidence can only be achieved through protracted investigation.

Category C refers to an investigation where it is obvious from the outset what happened and securing evidence or completing the enquiry can be achieved relatively easily.

Specialist Investigations

When we spoke to PIRC they shared that due to their requirement to provide a local response in certain circumstances, it is difficult to maintain specialist teams or officers who only deal with certain cases as this could cause delays in other investigations.

For example, they shared that in relation to sexual crimes, they are not presently set up to provide an immediate response to these. However, in relation to historic cases, they shared that they have sexual liaison officers.

Finally, they told us that in relation to investigative interviews, they have people trained to be joined investigative interviewers which means they can interview children in the presence of parents or an appropriate adult.

Police Investigations and Review Commissioner



On Call Provisions

PIRC shared with us that they have one investigations team who is on call at all times. This team will determine if there is need for an immediate response such as the event of a serious incident or a death in custody. Police Scotland can contact the SIO or Head of Investigations who can in turn call out other teams if needs be.

The current On Call allowance is £171.23 per week which is a return for being on call. If an investigator is actually called out they can claim payment at their normal rate or choose to use the time as Flexi-Time which can be taken off at another time.

Body Worn Video

PIRC shared with us that currently only armed officers wear body worn video, however, there are plans to roll this out across all operational police officers. They shared that they are very confident this will cause a decrease in cases for them and cited a study they were privy to which reflected that complaints against the police in Derry/Londonderry in Northern Ireland declined by 90% following the implementation of body worn video (note the comments from PONI above in relation to this).

Resourcing

PIRC shared with us that they endeavor to distribute investigations in an 'equitable' manner. In some cases, they said that a more minor investigation will be passed to an Investigator who will look after it themselves and in the event that a more complex case arises, a Deputy SIO will take it on. For the most complex cases, PIRC told us that a SIO will investigate.

In total, our discussions with PIRC reflected that each team will carry a total of two serious investigations and up to five further minor investigations at any given time, with priority always being given to more serious cases.

The team aim to complete 80% of serious cases within three months and are currently achieving a 79% close rate on cases of this nature.

In relation to grading, PIRC shared with us that they are paid at the Scottish Civil Service rate of pay. They indicated that the Commissioner is a 'Senior Civil Servant', Director is a C3 grade, Head of Investigations is a C2 grade, SIOs are C1, Deputy SIOs are B3 and Investigators are B2.

Training

We spoke to the Head of Corporate Services with PIRC who discussed some of their training practices with us. She shared that recently, they have introduced skill and role profiles within the organisation, therefore they have a list of desirable skills associated with every role. They shared that as part of this body of work, employees within the organisation have been asked to review the skillset associated with their role and ascertain if they need extra training or refresher courses to help them bridge any gaps.

They offer a number of recurring training options such as health and safety training in-house, manager training for all those who are managing people as well as equality and diversity training for all members of staff.

The organisation noted that in relation to the nature of the work, they have had people trained in de-escalation and trauma to better understand complainants and handle situations in a helpful manner.

Finally, in relation to investigator training, PIRC has a two year programme which leads to the individual being able to take on the role of investigator upon completion. The programme contains very specific training which PIRC shared with us, such as attending a post-mortem and taking statements. They also have an agreement in place with Police Scotland whereby the trainees will go through the detective/investigator programme with them.

Police Investigations and Review Commissioner



Resourcing

The entire organisation is graded in line with the Scottish Civil Service which the Head of Corporate Services believes is appropriate.

The organisation shared that over 50% of employees are Investigators. They also noted that while they have historically outsourced legal work, they have recently hired a Head of Legal Services due to the volume of work currently.

Independent Police Conduct Authority

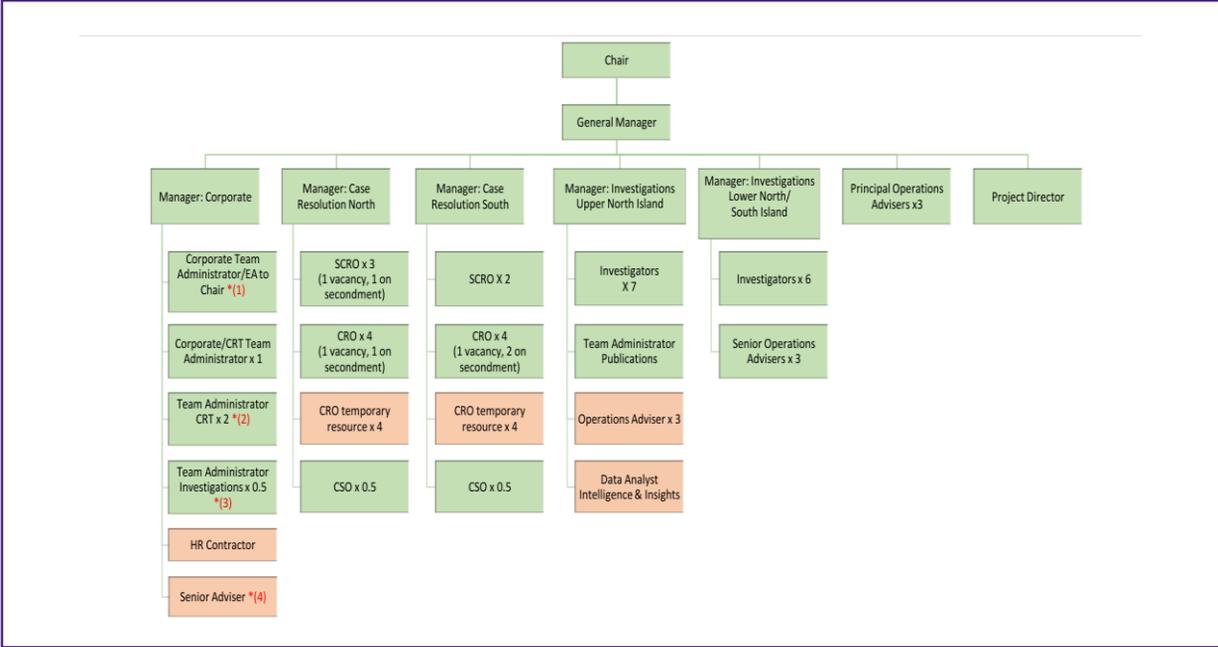


Illustration of department structure within the Independent Police Conduct Authority

Remit

The Independent Police Conduct Authority (IPCA) handles and resolves complaints made against the police in New Zealand. They are also notified of incidents where the police have caused deaths or serious injury and are able to investigate these also. Furthermore, the IPCA monitor police detention facilities to ensure that human rights standards are being met.

Systems & Processes

When we spoke to the IPCA they shared with us that they have moved entirely away from being paper-based. They have a case management system which they believe works well. They told us that this is in addition to having access to 3-4 police terminals within the building which they can use to access police information. They noted that their system is audited quarterly and that each person who accesses must log what exactly they are accessing and the reason for this.

Operations

The organisation is an independent organisation led by a judge. They have Seven Departments which are organised mostly in accordance with location. They are listed as follows:

- Corporate;
- Case Resolution North;
- Case Resolution South;
- Investigations Upper North Island;
- Investigations Lower North / South Island;
- Principal Operations; and
- Projects.

Our contacts reflected on a largely collaborative relationship with the police. They shared that they do not have

Independent Police Conduct Authority



power to prosecute and can solely make recommendations which makes for a relatively good relationship. They did add that they are extremely conscious of their independence therefore do not want the perception that they are cooperating too closely with police as maintaining independence is essential to the organisation.

Investigations

Structure

The IPCA shared with us that the investigations teams are led by a General Manager and each of the teams have a Manager who is responsible for that specific area. The teams are split out on a location basis as summarised below:

- Case Resolution North
- Case Resolution South
- Investigations Upper North Island
- Investigations Lower North / South Island

Communication

The organisation told us that they publish 99% of the independent investigations on their website unless there is an exceptional reason not to do so. The current Commissioner has increased public reporting, they said.

Categorisation

The IPCA have a triage process which relates to admissibility. Per this process there are cases which clearly require investigation for example the discharge of a firearm, similarly there are cases which do not need an investigation and this is clear from the outset. However, there are a number of cases where the team need to complete an admissibility assessment which involves reviewing the complaint, custody footage and evidence; and then make a decision whether this is something which needs investigated. The organisation noted that the final decision on this is made by the management committee and the judge.

Our contact shared that there is a categorisation meeting weekly which sometimes results in a robust debate. They noted that the categorisation meeting will end with a case being put into one of the following four categories:

- Independent – this is where IPCA conduct an independent investigation of the case;
- Oversight – this is where IPCA oversee an investigation being carried out by the police force;
- Not serious – this is where they believe an apology or similar will resolve the issue; and
- Not investigating – this is where they deem the complaint not to need an investigation.

Specialist Investigations

The organisation shared with us that while they do not have specialist investigatory capabilities, they engage with a government body who are also contracted by the police to conduct all specialist investigations. However, they were clear that some of their Investigators have specialist interview training allowing them to interview complainants in specific sensitive circumstances.

On Call Provisions

The team told us that where there is a critical incident the police force will get in contact with the General Manager. They indicated that there is no need for them to respond immediately therefore they don't have people who are on call.

Body Worn Video

The IPCA shared with us that the New Zealand Police do not have this.

Independent Police Conduct Authority



Resourcing

The IPCA currently have 13 investigators split across 12 FTEs. There are 96 open category A cases which are at various stages. They also said there are 240 category B cases and that annually the organisation is in receipt of around 4,000 complaints.

They noted that each year they endeavour to ensure that each investigator deals with 7/8 category A cases and 8 category B cases.

In respect of critical incidents, the IPCA shared with us that they allocate these to 1 of 4 senior investigators who will lead on the case. They also noted that they assign a junior investigator to shadow the senior investigator to ensure this is a learning experience.

Grading

Those we spoke to in the IPCA stated that they do not have a standardised public sector grading in New Zealand. They indicated that different departments operate different grading systems. They said that although there isn't a grading system, they do have remuneration bands which have been recently reviewed. They indicated that these had fallen behind market rate which caused an adverse impact on recruitment for the organisation. They added that due to many of the skills needed for a successful police oversight body being in a highly competitive talent market, it is important to be an attractive employer.

Office of Public Integrity, South Australia

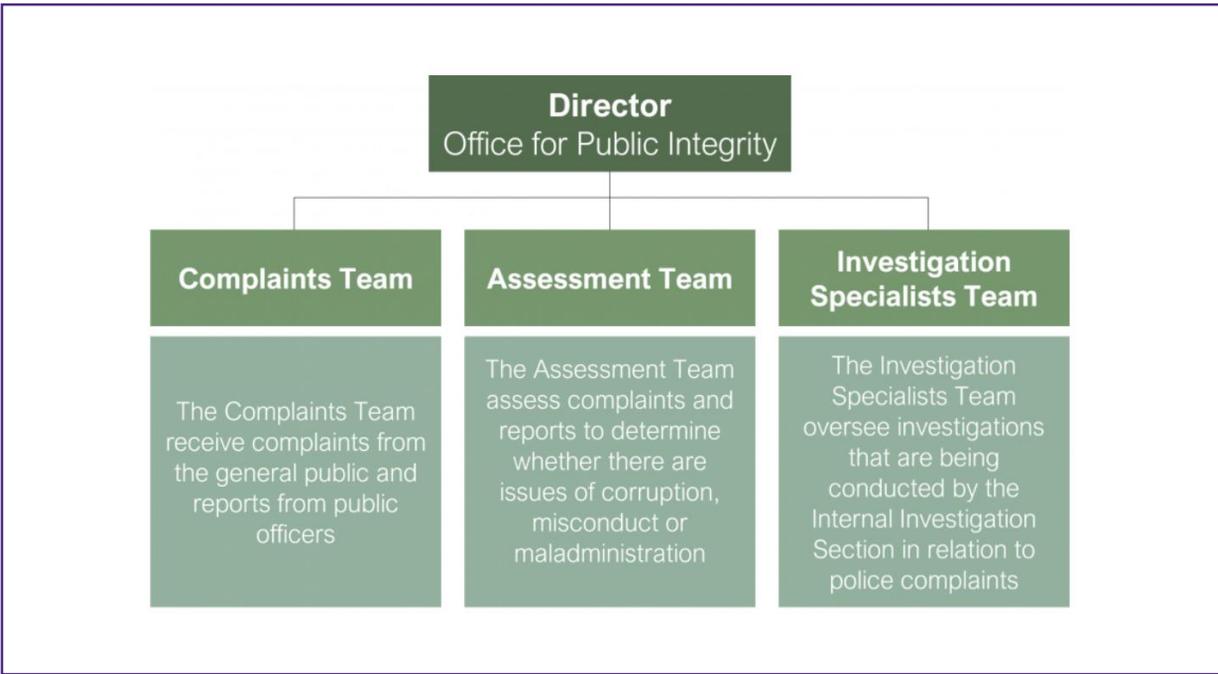


Illustration of department structure within the Office of Public Integrity

Remit

The Office of Public Integrity (OPI) has a wider remit than some of the other police oversight bodies we have spoke to. Their geographical remit covers the entirety of South Australia. As well as police, the OPI handles complaints about public administration, reports of corruption, misconduct and maladministration in public administration from public officers and authorities. Following this, they may refer complaints or reports to subsequent bodies such as the following:

- The Ombudsman South Australia;
- The Independent Commission Against Corruption; and
- Judicial Conduct Commissioner.

It is important to note that the OPI provides oversight of investigations and complaints about police officers and comments on them rather than delivering an investigative function themselves.

Systems & Processes

The OPI shared with us that they have live, unrestricted access to the South Australian Police case management system and can see everything the police can see in real time. They shared that the former police ombudsman body did not have this access and the OPI believe that one key benefit of this change is that they can oversee investigations as they progress and do not need to wait until the end to investigate or review them. They highlighted that they can intervene at an early stage in the investigation if they feel they need to and that this saves time and can serve as a preventative measure rather than a corrective one. They noted that they believe this is more efficient in comparison with reviewing an investigation at the end and that it allows them to do their job more effectively and more efficiently.

In addition, OPI have their own case management system which is called Revolve. They indicated that they extract relevant content across from the South Australian Police case management system as well as recording all of their own decision-making on this system.

In conclusion, OPI indicated their belief that they are reasonably digitally mature and that currently they would not seek to do anything differently.

Operations

The OPI is an independent organisation who is led by a Director. She reports to the Attorney General and for HR purposes the organisation is a business unit within the Attorney General's office. However, they noted that for the purpose of decisions, they are completely independent and nobody can 'interfere' with their decisions. The organisation has 18 employees and three key units as follows:

- Complaints Team;
- Assessments Team; and
- Investigation Specialists Team

The organisation also shared with us that they enjoy a relatively good relationship with the South Australian police. They went on to say that although there are points where they have different perspectives on things, the relationship is respectful and productive.

They said that they are based in Adelaide with no other regional offices.

Investigations

Structure

OPI shared with us that within their Investigation Specialists Team, they have only two employees who oversee South Australian police internal investigations into police officers. They said that within the police force itself there is a team who conduct internal investigations containing ten Detectives and two Chief Inspectors.

Communication

The organisation stated that they are a relatively new body which was formerly the Police Ombudsman, they are 'starting from scratch' with the media. They said that they designed a new website and promotional material to communicate their remit and approach to the public. They also said that while they update complainants personally with the outcome of all complaints, they are not sure how much contact they receive through the duration of the process.

Categorisation

Due to the nature of overseeing the investigations in real time, the OPI shared with us that they do not categorise the investigations.

Specialist Investigations

Due to the small team they have in-house, they do not have specialist investigations teams.

On Call Provisions

The OPI noted that they are not On Call and solely oversee complaints investigations during business hours.

Resourcing

The organisation shared with us that there are currently have approximately 200 active investigations. These will be divided between internal investigations in South Australian Police or given to external specialists. The two Investigations Specialists within OPI will oversee 100 cases each.

Body Worn Video

OPI spoke at length about how they perceive the impact of body worn video on police oversight. They discussed that they generally don't have an issue with officers switching on the cameras as it is a breach of their code of conduct not to do so.

They did however highlight that teams such as Special Forces and Rescue do not have to switch them on which has caused problems in the past.

The body worn video footage is kept for three months and is automatically uploaded on to the intranet which OPI have access to.

Training

Our contact shared with us that while there is no mandatory order on the OPI to provide education to the police internal investigations team, they have introduced a training programme at the Police Academy about their obligations within the police. They believe this will have a positive impact on investigations at an early stage.

Grading

We were told that grading within the organisation is in line with South Australian public service and that there is an administrative stream, a legal stream and an executive stream.

Regulatory and Oversight Bodies, Ireland

Introduction

In addition to the extensive police oversight benchmarking that we conducted, we also spoke to a number of regulatory and oversight bodies based in Ireland. The organisations we spoke to are listed as follows:

- Office of the Ombudsman;
- Ombudsman for Children;
- Data Protection Commissioner;
- Health and Safety Authority;
- Revenue Commissioners; and
- Department of Social Protection

We had individual discussions with each of the organisations and discussed their systems and processes, including digital maturity, their operational procedures, staffing and grading as well as training and how they conduct investigations within their specific remit.

We noted a number of important insights, which we believe may be relevant in the GSOC transition process.

Systems, Processes & Operations

Some of the organisations referenced above, use a case management system as well as SharePoint to manage cases and communications throughout the lifecycle of their cases. Others discussed Lotus Notes and Microsoft Dynamics with us as having been something which helped them on their path to become paperless.

They reported varying levels of digital maturity throughout our discussions with each of the organisations.

Some shared that they collate data through their respective case management systems each month and use this to inform Key Performance Indicators and overall performance within the organisation. For example, some of the KPIs we discussed with the comparable bodies were as follows:

- Complaints per year;
- Complaints progressed to investigations stage;
- Frequency of contact with complainant;
- Hits on the website, phone or in-person complainant service;
- Complaints at each stage; and
- Complaints being progressed to conviction.

One organisation shared with us that they have a Wellness Committee made up of staff members who organise social things and wellness events each month. They reflected that they believe although there is a relatively small budget for this, it has been a successful initiative.

Staff Grades

Each of the organisations we met with told us that their grading and salary bands are in line with those of the Irish Civil Service. Many of them expressed challenge with this and said they believe it to have an adverse impact on talent attraction and hiring.

They also shared that within their organisations there are a combination of professional and technical grades as well as administrative grades.

Regulatory and Oversight Bodies, Ireland

Investigations

All of the organisations we met with provide oversight and conduct investigations in some respect. They each discussed their process for investigations or inspections and elements of each they believe are important and efficient.

Competitor and Consumer Protection Commission: This organisation disclosed that they have a set period within which they must decide on admissibility. They indicated that the specific period depends on the business unit, however, they endeavor to contact the consumer within three days before screening the complaint and responding within a further three weeks.

Data Protection Commissioner: This organisation shared with us that they provide deadlines to bodies under investigation to provide answers to a list of queries sent to them by the Data Protection Commissioner. They noted that they are on call to receive forms at all times. In relation to communications, the Data Protection Commissioner shared with us that they are very media aware and media focused and for this reason they pursue proactive engagement with the media. They also maintain an active social media presence and deliver presentations to conferences and stakeholder groups.

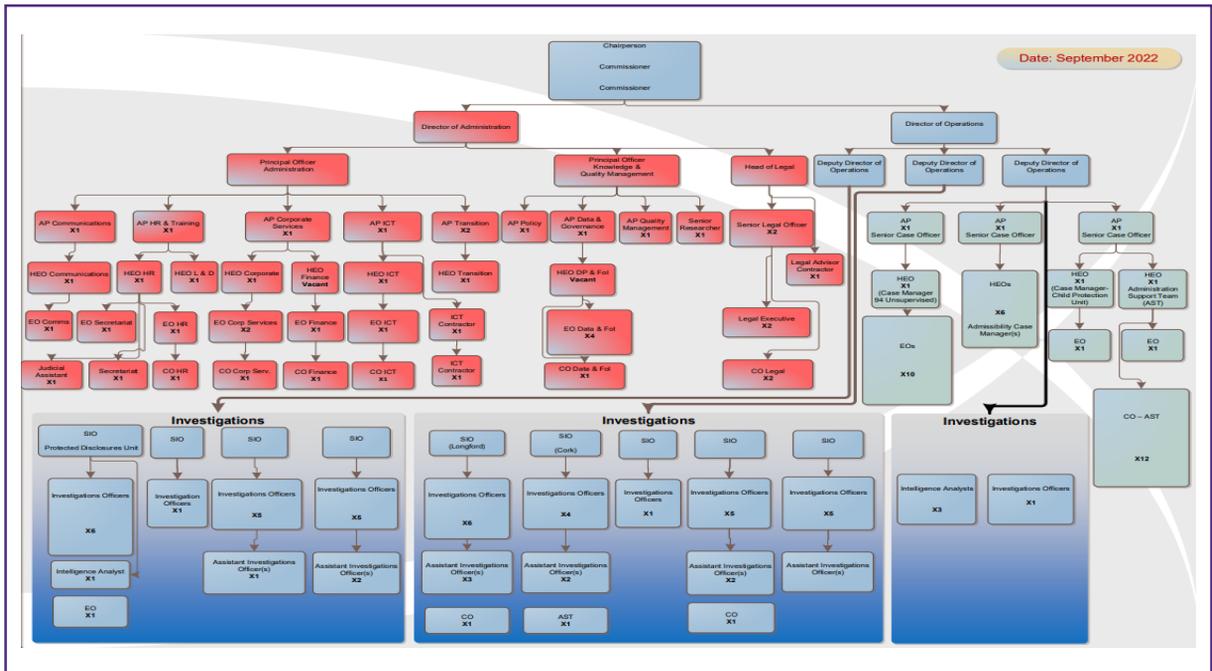
Department of Social Protection: This organisation highlighted to us that they have a number of Gardaí who are on secondment. These officers report to their local chain of authority and maintain all of their Garda powers when investigating on behalf of the Department. They also noted that they have social welfare inspectors linked to each geographical location and that this works extremely well. They noted a figure of approximately 60-70 work items per Inspector per month but added that not all of these are urgent.

Office of the Children's Ombudsman: This organisation shared with us that it is their believe that more than one person should investigate each case and that at any given time investigators will be involved in 4-5 investigations. They shared that they have a 'watch list' meeting every Monday where they discuss cases. They will also touch on when everyone involved has been contacted last to ensure they meet their objective of contacting complainants at least once every six weeks.

Health and Safety Authority: This organisation noted that they do not have a formal on call system currently and that they have been relying on goodwill for a number of years. However they shared that there is a pilot sanctioned for an annual figure of 3,500 euro per person on call. They shared that they intend to have a team of four available weekly in different areas of the country. They also shared that they do have specialist teams which works well when investigations require specific expertise.

Office of the Ombudsman: This organisation told us that they have a stringent triage system in place for each complaint including an early resolution team made up of more junior employees who try to resolve cases at an early stage. They noted that only 15% cases make it to investigation stage. They shared that investigators at AP level carry 12-15 cases at each time. They receive roughly 4,000 complaints annually.

The Garda Síochána Ombudsman Commission



Remit

GSOC is an independent statutory body tasked with the responsibility of providing efficient, fair and independent oversight of policing in Ireland. The organisation received and deals with complaints made by members of the public in relation to the conduct of members of An Garda Síochána. In addition to this, GSOC holds a number of other responsibilities which are listed as follows:-

- Conducting independent investigations, following referral by An Garda Síochána, in the event it appears the conduct of a Garda may have resulted in death or serious injury to a person;
- Investigating matters in relation to conduct of Gardaí when it is in the public interest, even in the absence of a complaint;
- Investigating an instance where there is a concern that the Garda Commissioner may have committed an offence or behaved in a way which would constitute serious misconduct; and
- To examine any 'practice, policy or procedure' of An Garda Síochána.

The organisation works to fulfil this remit and publishes an annual report each year which details activity undertaken in relation to their oversight responsibilities.

Systems & Processes

In relation to systems within the organisation, GSOC intend to procure a new Case Management System as the one currently in use is now dated and out of support (although an extended support package is in operation). Discussions with employees within the protected disclosures unit highlighted that instances where the CLUE system (used to manage certain cases) is used, it is much easier to use than the current CMS.

We also discovered that some people within GSOC use a number of Excel trackers to report on their daily roles and responsibilities.

An Garda Síochána Ombudsman Commission



Operations

GSOC is currently overarched by a three person Commission. Following the implementation of the Policing and Security 2022 Bill, the organisation will be led by an Ombudsman, a Deputy Ombudsman and a Chief Executive Officer. GSOC is currently split into two directorates – Administration and Operations. Within the Administration Directorate there are the following units:

- Communications;
- HR and Training;
- Corporate Services;
- ICT;
- Transition;
- Policy;
- Data and Governance;
- Library; and
- Legal

Within the Operations directorate there are the following units:

- Investigations; and
- Case work

GSOC currently reports to the Department for Justice.

Investigations

Structure

The investigations unit sits within the Operations directorate of GSOC. As such it is ultimately led by the Director of Operations. The unit has three Deputy Directors and Nine Senior Investigating Officers who each have a team of investigators. Currently the teams are location based with one team in Cork, one team in Longford and the majority based in Dublin. This is with the exception of the Protected Disclosures Unit, whose grouping is based on the protected disclosures role itself.

Communication

The organisation shared with us that they have always been generally risk adverse when it comes to communication. They do not proactively engage with the media and most media engagement would be simply to state 'no comment'. However the organisation has ambitions to improve media engagement and try to create a face of the organisation to greater inform the public of their purpose and some of the key outcomes they drive for them.

Categorisation

The investigations are categorised on a Category A, Category B and Category C system depending on the gravity of the case. Those we spoke to within GSOC also highlighted that it is possible for a case to transcend the scale depending on political sensitivity or public interest. Often, categorisation decisions can be made at as senior as Commission level. It is often that cases are not categorised and the category system is not used for assigning cases.

Training

Throughout our discussions with GSOC we ascertained that there is not a proactive and intentional approach to training and development within the organisation. They highlighted that they believe there should be a more structured approach taken to training and development both within the Investigations teams and the wider directorates as well.

An Garda Síochána Ombudsman Commission



Resourcing

GSOC is currently structured in line with the Civil Service grading structure in Ireland. Within the Administration Directorate, roles are graded according to the Civil Service pay scale. Within the Operations Directorate, roles are graded in line with Civil Service grades, except that they are investigatory grades which align with various sections in the pay scale.

Benchmarking Findings

Summary

Theme	Comparison
Remit	Our benchmarking exercise found quite a broad spectrum in terms of remit amongst the Police Oversight Bodies. Some of the bodies are similar to GSOC in that they investigate complaints from the public and hold some police powers e.g.. Warrant cards. However, there were others who noted that they simply oversee and review investigations rather than playing an active role in the process. We found the body with the most similar remit to GSOC to be PONI.
Systems and Processes	Each of the organisations reported varying levels of digital maturity, with some of them using a case management system and others using a mixture of tools such as Microsoft, SharePoint and Lotus Notes for their document and process management. Most notably, OPI shared with us that they have real-time and unrestricted access to South Australian Police systems and that they believe this saves lots of time and can be a preventative measure rather than a corrective one when performing police oversight. This, they believe, allows the citizen to have a more positive experience.
Operations	All the oversight organisations we spoke to noted that they are independent and each reported varying levels of proximity to their parent department. Each of the Police Oversight Bodies discussed their relationship with their respective police force with PIRC noting that they believe working together with Police Scotland to enhance the public perception of policing makes it essential to have a good working relationship. They all noted their KPIs which included elements such as time to complete investigations and frequency of contact with complainants.
Investigations	We discussed investigations and inspections in-depth with all the organisations we spoke to. Unsurprisingly, due to the variation in remit of the organisation, the number of cases per Investigator or Inspector also varied. However, where an organisation had a similar remit to GSOC, cases per Investigator were notably lower. More information on caseloads, location and triaging of complaints can be found on the next page of this report.
Training	We discussed training and development with all the organisations we met with. Each of the organisations said that they work with a mix of trainee investigators and experienced hires in the investigations space providing specialist training where case volume called for it. In relation to trainee investigators, a number of the organisations we met with highlighted that they had a form of 'trainee scheme' whereby trainee investigators embark on on-the-job shadowing and training with view to becoming a fully-fledged investigator within two years.
Resourcing	Aside from OPI, all of the organisations we met with from outside Ireland stipulated that they do not work strictly within the local Civil Service grading system. However, each of the bodies we met with within Ireland are tied to the Irish Civil Service grading system.

Benchmarking Findings

Police Oversight Comparisons

Organisation	Case Numbers	Triaging System	Geographical Footprint
Police Ombudsman of Northern Ireland	30 category A, 15 category B and 20-22 category C split between 91 investigators at any one time.	Cases are triaged at complaints handling stage on admissibility and destination of the case	One location in Belfast
Independent Office of Police Conduct	2-5 cases per investigator	Cases are triaged based on a scoring system	London, Cardiff, Birmingham, Wakefield, Manchester and Warrington
Police investigations and Review Commissioner	2 serious investigations and 5 more minor investigations per team	The head of unit (SIO) makes decisions on whether to investigate a case or not	One location in Scotland
Independent Police Conduct Authority (NZ)	7-8 category A cases and 8 category B cases per investigator per year	There is a triage process to determine admissibility and category at the initial stage	One location in New Zealand
Office of Public Integrity (Australia)	100 per investigations specialist (only providing oversight not investigating)	There is no triage system as cases are investigated in real time	One location in South Australia

