
Fitness to Practise Improvement Plan - progress update

Executive Summary

This paper is to update Council on the progress of the Fitness to Practise (FtP) Improvement Plan. It includes an update of the project status for each of the 16 projects and a detailed look at projects nearing conclusion or those entering the benefits realisation stage

This is a shorter update since it is only a month since Council was last updated. The most significant progress since the last update has been on the projects that were rated as 'red' (the new case management system and projects dependent on that). These projects have now completed as the new case management system went live on 7 June 2021 in line with the revised plan.

We have also reached the end of the 18 week PerformPlus programme where we receive intensive support from PwC. This now enters a sustainability phase with less intensive support provided by the PwC team over the next few months. This paper includes some of the key benefits from the 18 week programme.

Overall, the projects are progressing well with ten projects completed and/or entering the benefits realisation phase. There are three projects due to be completed and/or move into the benefits realisation stage in July. For the two projects not progressing to plan or on hold we provide Council with an update below.

High level project status overview (see Appendix 1 for further detail):

Projects completed/in benefits realisation stage	10
Project due to complete in July 2021	3
Projects at risk (tracking as Amber)	2
Projects at risk (tracking as Red)	0
Projects on hold	1

This paper also includes analysis of our performance in FtP up to the end of May 2021.

Previous consideration New standing item at Council (as of February 2021) to update Council on the progress of the FtP Improvement Plan.

Oversight of the progress of our FtP Improvement Plan is also provided by the FtP Improvement Board.

Decision	Council is asked to note the update.
Next steps	The next report on progress will be provided to Council on 22 September 2021.
Strategic priority	Strategic priority 1: Continuously improve and innovate - Improve our performance to achieve the Professional Standards Authority's Standards of Good Regulation.
Financial and resource implications	None as a result of this paper.
Authors	Andrew Smith, Executive Director of Regulation Andrew.smith@hcpc-uk.org Laura Coffey, Head of Fitness to Practise Laura.coffey@hcpc-uk.org

1. Introduction

- 1.1 Improving our performance in Fitness to Practise (FtP) is the priority for the HCPC in 2021. This means improving the quality and pace of our management of FtP cases. The HCPC has an FtP Improvement Plan in place and we are taking action in 2021 to accelerate and augment our improvement work.
- 1.2 To do this we have prioritised 16 key projects to be delivered between January and July 2021. This paper provides a progress update to Council since the last meeting in May 2021 (including the status of each project) and a more detailed look at some key projects that have recently concluded (including the expected benefits of those projects).

2. Progress since May 2021

FtP Improvement Programme – Projects current status

- 2.1 Since we last reported to Council in May 2021, a further four projects have completed and moved into the benefits realisation stage, bringing to the total of completed projects to 10. Further details of those projects are set out below.
- 2.2 We have also provided an update on the two projects that are tracking amber.
- 2.3 There are no projects tracking red. One project is paused until July 2021.
- 2.4 Appendix 1 provides the high-level status update as of 31 May 2021.

A look at key projects that have been completed

- 2.5 In this section we provide an overview for Council on the key projects that have completed since our last report where the focus is turning to benefits realisation.
- 2.6 We also provide an update on the Perform Plus programme and the outsourcing of cases to external legal firms.

New case management system

- 2.7 On 7 June our new case management system (CMS) went live. Inevitably there have been some bugs with the system and our Project and IT teams have been working closely with the supplier to resolve them. We planned for this and put mitigations in place such as a two-week period of 'hyper-care' with our supplier for the weeks following go-live. None of the issues identified are preventing us from managing or progressing our business as usual work.
- 2.8 We are now in a period of adapting to the system and embedding the new ways of working the system will enable. A network of CMS Champions across the

FtP department are providing support to the teams and sharing best practice on how to use the system. This has included producing a series of 'How To' guides and drop-in sessions to share tips and 'hacks' for getting the best out of the system.

- 2.9 In July we will commence the work to scope out the phase two development of the system, which we expect to include a focus on further streamlining and automation of workflows.

Risk assessment tool and tailored case plans

- 2.10 At the last Council meeting we explained that projects that had a dependency on the new case management system had also been delayed. We have now been able to conclude the two relevant projects: the new risk assessment tool and the introduction of tailored case plans.

- 2.11 The risk assessment tool, which is embedded in the new system, is now operational. Case Managers received training on how to use the tool and our approach to risk assessments and interim order management in May. Focused refresher sessions have also been provided to the teams in early June.

- 2.12 We have a cohort of six Risk Champions across the case management teams, who are subject matter experts in this area. They have been involved in the development of the risk tool and training, and their role is to provide continued support and process confirmation of best practice across the teams.

- 2.13 From July, we commence quality assurance checks of the risk assessment tool and process. These checks will be undertaken monthly going forward as business as usual practice within the department.

- 2.14 The new case management system provides automated workflows for each part of the FtP process. This will help to improve consistency and compliance with our processes across the teams. In addition, we have introduced a new case management document to support best practice planning of FtP investigations. Training on the case planning document and approach was provided to all teams across May and June.

- 2.15 This work is also supported by a cohort of four Case Planning Champions within the case management teams. Their role is similar to that of the Risk Champions.

- 2.16 As with the risk tool, from July we will also start checks on the quality of the case plans being produced in the teams. These checks will be undertaken monthly.

- 2.17 We have planned further follow-up training in September on case planning, to be supported by one of our legal providers.

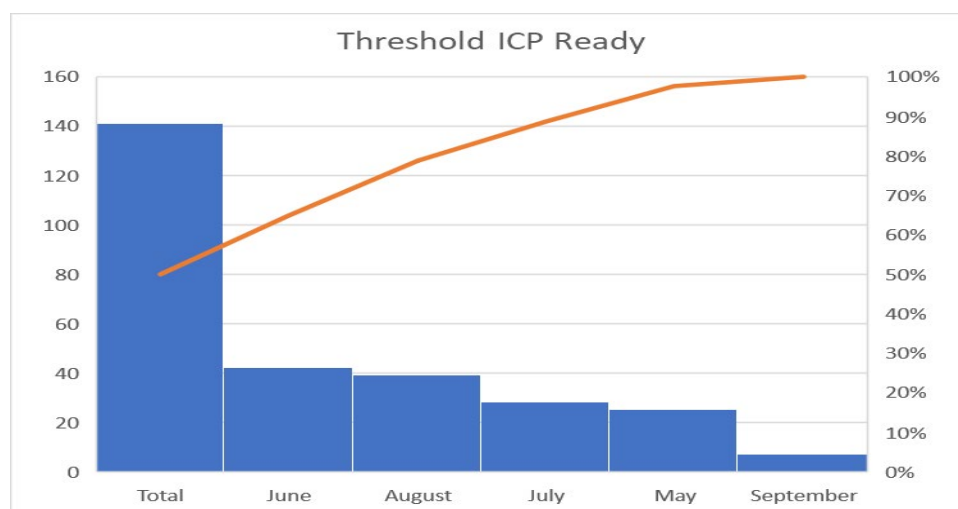
Update on the threshold cases we allocated to external legal providers and the frontloading pilot

2.18 In February 2021 we handed over 280 Threshold stage cases to the legal firms. In the previous paper, we explained that the forecast number of cases that would be closed against the Threshold had increased to 41% from our initial conservative planning assumptions of 35%. Based on current data from the legal firms we are now forecasting that 50% of these cases will be closed at threshold.

2.19 We are on track for the remaining cases to be returned to us for an ICP by September as planned.

Figure 1: Projected time for those cases not closed at threshold to be ICP ready

Threshold	Cases ready for ICP listing	% Total for ICP
May	25	18%
June	42	30%
July	28	20%
August	39	28%
September	7	5%
Total	141	100%



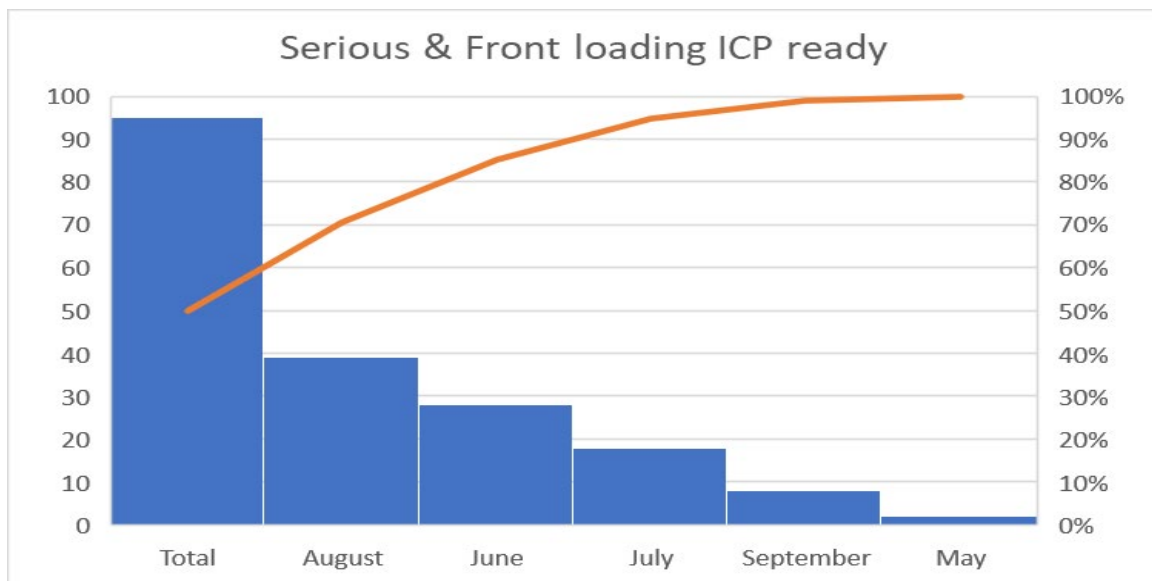
2.20 In February 2021, we have also allocated a total of 95 serious cases to external law firms, to be progressed as ‘frontloaded’ investigations. This means they will be returned to us for ICP ‘hearing ready’. In the previous Council paper the total number cases allocated to external law firms as part of this pilot was given as 100. The number has reduced as we have taken some of these cases back in-house where there is an ongoing third party investigation, or which are linked to another case we hold, which could not be completed during the timeframe of the pilot.

2.21 These cases continue to progress well and we are expecting that all frontloaded cases will have been returned to use for an ICP by the end of September 2021. Previous forecasts from the legal firms were that 25 cases would be returned in September. This is now estimated to be eight cases with more cases being returned earlier (in August).

2.22 We are working collaboratively across the case management and Tribunal Services teams to ensure there is sufficient ICP capacity in place for both business as usual and case from this frontloading pilot cases over the next few months.

Figure 2: Projected time to conclude or progress our serious cases selected for the frontloading pilot

Serious	Cases ready for ICP listing	% Total for ICP
May	2	2%
June	28	29%
July	18	19%
August	39	41%
September	8	8%
Total	95	100%



[Update on the Perform Plus programme](#)

2.23 Cycle One the Perform Plus programme has concluded – bringing to an end an 18 week period of intensive coaching and development for our people supported by PwC.

2.24 During this 18 week period our teams have delivered a tangible impact in terms of increasing our productivity, developing leadership capacity, improving quality

and consistency of output and increasing staff engagement and collaboration. Figure 3 shows what we set out to achieve and how we did it. Figure 4 shows the impact it has had during this 18 week period.

Figure 3 – What we set out to achieve and how we did it

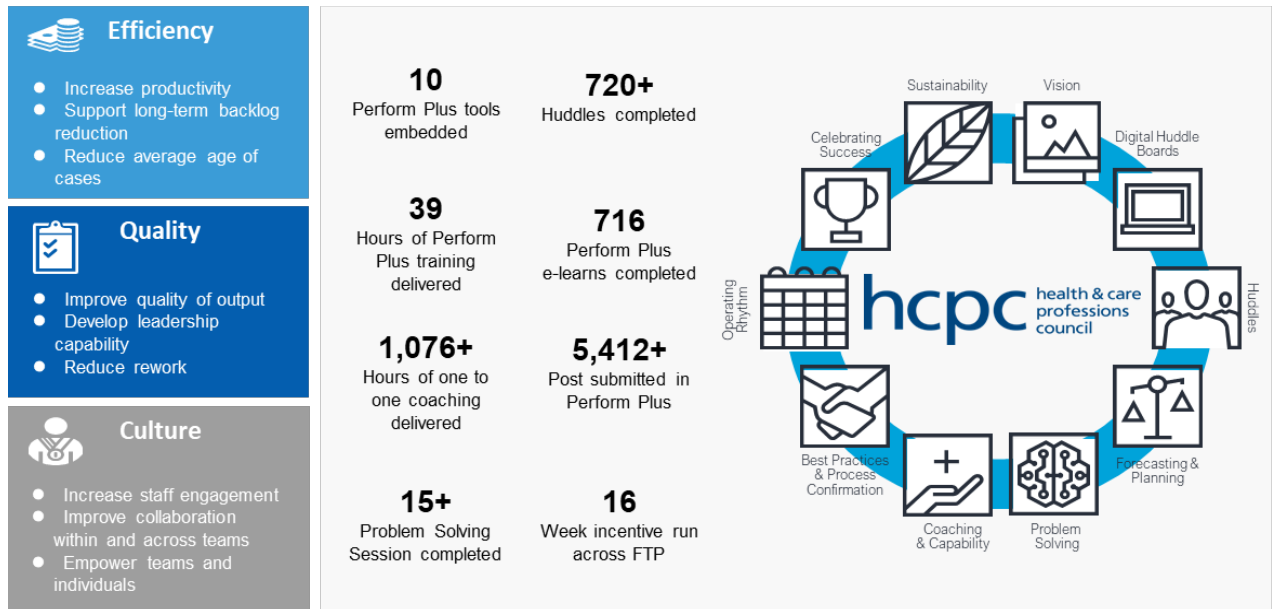


Figure 4 – Impact after 18 weeks



- 2.25 Since the start of the Perform Plus programme staff turnover in FtP has reduced from 34% in January 2021 to 21% in May 2021.
- 2.26 The completion of Cycle One has provided a solid foundation from which we can continue to make improvements. This is our new baseline and we must sustain and continue our improvement from this point onwards.
- 2.27 Cycle Two starts in July with the aim to embed the elements from the 18 week programme as a sustainable 'business as usual' model for FtP.
- 2.28 Momentum gained from Cycle One will be maintained and driven by a Perform Lead, Change Agent and our Champions, supported by e-learning for new joiners and refresher learning for all team members. In short, these new ways of working, with daily team huddles focused on individual and team performance, problem solving sessions, developing best practice standards and celebrating success is now 'just how we do things around here'.
- 2.29 To support continuous improvement 100 day plans created by managers for Cycle Two have identified opportunities to further develop performance.
- 2.30 Appendix 2 includes some examples of the feedback from the FtP team.

A look at key projects that are tracking amber

- 2.31 In this section we provide an update on the two projects that have an amber status on the programme summary report in Appendix 1.

Increase to 500 hearings

- 2.32 This project remains amber due to external factors, namely the ongoing impact of the pandemic, and the uncertainty around whether our emergency Rules that provide powers to hold remote hearings will continue beyond October 2021. We continue to plan for a return to holding in-person hearings in larger numbers from the autumn.
- 2.33 We have increased our hearing capacity and in June alone have held 41 substantive final hearings. This is the highest monthly final hearing activity since October 2019, when hearings were increased in preparation for the transfer of social work cases to SWE.
- 2.34 We will provide Council with more detail about our forecast for hearings activity at the next meeting in September.

SOPs and guidance

- 2.35 There has been delay to making the final edits to our draft guidance documents supporting our new ways of working. This was to ensure that the documents reflected the post-go live processes of the new CMS and to incorporate screen shots of the system.

- 2.36 The guidance documents will be signed off by the end of June and the project is therefore expected to close at the end of July.
- 2.37 As part of cycle two of Perform Plus, a further suite of Best Practice Standards will be produced by the teams. This will form a new, separate project commencing in July 2021.

3. FtP performance dashboard

- 3.1 See Appendix 3 for the FtP Performance dashboard. This shows month end data for May 2021 and includes analysis of the data. Council should note that the previous performance report presented to Council in May included data up to 14 May 2021. Going forward we will be presenting month end data to ensure consistency for comparison.

4. Risks

- 4.1 As the dashboard shows (section 3 and Appendix 3), we are concerned about the large number of cases at the Threshold stage. We have taken short term action to support the team by allocating cases to the external law firms (which is progressing well - see paragraphs 2.18 – 2.22 above), as well as longer-term action to increase capacity and stabilise the team through the recruitment of new case managers.
- 4.2 However, there is still a large number of cases at that stage of the process. To mitigate this we have taken steps to advance cases that have met the Threshold to the Investigations stage, and have held problem solving sessions with the team to identify and resolve barriers to case progression.
- 4.3 In addition, the Operational Manager in Investigations is also providing support to review cases suitable for transfer and providing case direction.

5. Benefits tracking for the FtP Programme and future reporting

- 5.1 We are on track to have delivered all projects in the FtP Improvement Programme by the end of July. Our focus will shift towards measuring and tracking the benefits of each project.
- 5.2 At the last meeting in May Council asked for future updates to focus on the impact of the projects and what this means for our trajectory in terms of improved performance.
- 5.3 From September's Council report onwards, we will provide Council with an overview and detailed discussion of the benefits we're realising as a result of the projects. We will also set out the trajectory for FtP improvement and, our progress against that trajectory.

- 5.4 We will continue to provide Council with the FtP performance dashboard with the addition of data relating to our quality measures.

6. Next steps

- 6.1 Council will be updated on the progress against our plan at each meeting in 2021.

Appendix 1: Project status report

	Project	RAG	Leadership Attention	R&I	Plan
1	New CMS		CMS launched on 7 June and is now in a 14 day 'hyper care' period, where the team are following up critical issues and managing any defects. A CMS Champions team has been created to support the team as they get used to using the new system. We will be starting to scope out Phase II shortly.		
2	New risk tool (embedded with CMS)		The new case risk assessment tool has gone live and training has been delivered to all staff. QA process to check the use of the new tool and the quality of risk assessment has been designed and agreed and will begin in July.		
3	New tailored case plans (embedded within the new CMS)		Tailored case plans have now been embedded within the case management teams. QA process to check the use of the case plans and the quality the plans has been designed and agreed and will begin in July.		
4	Update SOPs and guidance for new CMS and related process changes (including staff training)		There has been delay to making the final edits to our draft guidance documents supporting our new ways of working. This was to ensure that the documents reflected the post-go live processes of the new CMS and to incorporate screen shots of the system. The guidance documents will be signed off by the end of June and the project is therefore expected to close at the end of July.		
5	Targeted support to improve the age profile of cases at threshold stage		On track for all outsourced threshold cases to be returned by end of September. Current forecasts are that 50% of cases will be closed against the Threshold policy.		
6	Targeted support to accelerate old cases from SCT and Investigations team - including pilot of 'frontloading' for appropriate cases.		On track for all frontloaded serious cases to be returned by end of September, with the majority of cases being returned in August. The first frontloaded case will be considered by an ICP in August.		
7	FtP recruitment and retention strategy		7 Case Managers have joined since 1 June, and a further 6 to join by 7 July. Two further case managers will join later in the summer.		
8	Introduce legally qualified ICP chairs		This project is completed.		
9	New listings/scheduling process for HCPTS		High level process has been designed and final stakeholder engagement due to take place in July. Team training and process confirmation to be completed by July. Deployment moved to August to align with the first frontloaded cases being considered at ICP.		
10	Corrective case plans for all cases past KPI		This project is completed		
12	Internal quality audit of new threshold process		Project Completed, awaiting SMT approval of the report to close		
13	HCPTS panel member training		This project is completed.		
14	Tone of voice review		On hold		
16	Increase hearings to 500 hearings starting April 2021 (subject to COVID-19 restrictions)		Scaling up team to manage increased volume of hearings: 4 Scheduling Officers appointed and will start on 28 June. One Scheduling Assistant vacancy, 4 FTC Hearing Officer roles being advertised. This project remains amber due to external factors, namely the ongoing impact of the pandemic, and the uncertainty around whether our emergency Rules that provide powers to hold remote hearings will continue beyond October 2021. We continue to plan for a return to holding in-person hearings in larger numbers from the autumn. 41 final hearings scheduled in June.		

Appendix 2: FtP team feedback on the PerformPlus Programme

The feedback and responses received on the Perform Plus programme has been positive.

The high levels of engagement has been achieved alongside a large volume of ongoing change initiatives including implementing a new CMS system.

"I hope that the Perform Plus programme sustains and becomes a "Rock" firmly grounded in the culture of the Fitness to Practise Department and our ways of working in the coming Days, Weeks, Months and Years to follow"

"I think the PWC programme should be continued and we shouldn't let it slip. The Hardcore lessons of the actual steps are for me a piece of knowledge worth having in all walks of life"

"Thanks to HCPC for Perform Plus. Remote working has been challenging but having Teams chats and daily on time huddles has helped with keeping up with the updates and not feeling alone at home"

"I feel the programme has brought collaboration and new ways of motivating and engaging staff. It has helped boost team morale which was at an all time low before this programme. It has built a better relationship between staff and higher management"

"Although we had weekly team meetings, the introduction of Perform Plus programme has improved communication amongst team and other departments, made us take initiative to improve work processes and recognise successes and achievements of colleagues"

"Perform Plus has been great in creating a more positive department, with regular feedback and recognition of good work. It has also enabled us to work more closely with other teams in the department, which has been really positive"

"Perform Plus has greatly improved FTP teams communication and collaboration and I have personally enjoyed the experience"

"As a Department we have stumbled and met many challenges along the Perform Plus journey but we have also overcome obstacles in setting clear visions that have kept us on the path of continuous development and improvement whilst driving individual, team and departmental performance and increased productivity to be proud of"

Case volumes and case flow

Case Volumes at each stage of the process.

Month	Triage	Threshold	Investigations	SCT	Post-ICP
Current (May)	7 Cases	676 Cases	346 Cases	171 Cases	480 Cases
Prior (Apr)	12 Cases	698 Cases	356 Cases	150 Cases	470 Cases
Two Months Prior (Mar)	7 Cases	655 Cases	363 Cases	140 Cases	457 Cases

Case Flow Table

Case Split	Difference (May vs April)	Median number of weeks within current team	Difference (April vs March)	Median number of weeks within current team
Pre-ICP	-16	21	38	22
1. Triage	-5	1	7	2
2. Threshold	-22	15	29	15
External Law Firms	-42	38	-46	35
In-house	20	11	75	10
3. Investigations	-10	28	-15	31
External Law Firms	-5	9	25	5
In-house backlog team	-21	61	-16	53
In-house case teams	24	11	-21	12
Pending ICP	-8	25	-3	28
4. SCT	21	41	17	40
External Law Firms	-3	50	10	45
In-house SCT	21	26	7	35
Pending ICP (Internal)	3	50	0	45
Post ICP	10	38	11	40
Total	-6	123	49	128

Analysis

Threshold

- The number of open cases in the Threshold team at the end of May has decreased slightly from the end of the previous month but is higher than the end of February, when we allocated 280 cases to the legal firms. Whilst the total number also includes threshold stage cases allocated to our legal providers, it is still higher than where we would like it to be for this stage in the FtP process.
- We have taken steps to improve the flow of cases from Threshold to Investigations, including by directly moving cases where the threshold is met without the need for approval by a Senior Decision Maker. This is being run on a trial basis for three weeks. The Operational Manager in Investigations is also providing support to review cases suitable for transfer to the Investigations stage.
- The overall case flow balance of in-house threshold cases has increased, whilst the external cases have decreased as the legal firms have closed a number of cases. The decrease in the overall case volumes for Threshold is being driven by the work of the legal firms.
- The case remaining in the HCPC's Threshold team have a median age of 11 weeks, which is consistent with the median age in April. This means we have maintained performance but not improved since last month.

Investigations

- The HCPC's Investigation teams is performing relatively well as the number of cases in the team has decreased month on month (though this is in part due to cases not moving through from Threshold). The median age of case in that team is 11 weeks (9 weeks under the 20 week KPI). This is despite the age of the oldest case in the team increasing, which indicates the team are progressing cases across the age spectrum.
- The internal HCPC 'backlog' team caseload has reduced by more in May than the previous month as cases have been progressed to ICP. No new cases are being received by this team so we would expect the case flow to show a continued decrease. After a number of changes in the 'backlog' team we now have a stable team in place and this is evidenced by the improved performance in May.

SCT

- The overall case load for the Serious Case Team has increased since the April. This is due to the team starting to take new serious cases again from the end of April (previously these had been allocated to external firms as part of the frontloading pilot). The median age of cases within SCT is 26 weeks (6 weeks over the 20 week KPI) but nine weeks lower than the previous month showing an improvement in performance. This includes cases subject to a third party investigation.

Performance against KPIs

Current Cases Compared To Targets

Team - Ordered	Target (Weeks)	Ahead of Target	% Ahead	Behind Target	% Behind
1. Triage	2	7	100.0%		
Triage	★	2	7	100.0%	
2. Threshold	10	238	35.2%	438	64.8%
External law firms	★	10	1	169	99.4%
Inhouse	★	10	237	269	53.2%
3. Investigations	20	156	45.1%	190	54.9%
External law firms	★	20	33	3	8.3%
In-house backlog team	★	20	7	113	94.2%
In-house case teams	★	20	85	35	29.2%
Pending ICP (Internal)	★	20	31	39	55.7%
4 SCT	20	49	28.7%	122	71.3%
External law firms	★	20	20	69	77.5%
In-house SCT	★	20	28	41	59.4%
Pending ICP (Internal)	★	20	1	12	92.3%
5. Post-ICP	39	246	51.3%	234	48.8%
External law firms	★	39	28		
Inhouse	★	39	218	234	51.8%
Total	20	696	41.4%	984	58.6%

Analysis

Triage

- The Triage team is performing well with all cases being within KPI and only a small number of cases remaining in the Triage status at the end of the month.

Threshold

- The proportion of the in-house Threshold case load outside of KPI has increased since last month and is now over half the caseload at 53%. The impact of UAT for the new case management system and related training during May has impacted on the team's productivity last month. We are also trialling advancing threshold met cases to Investigations without the need for an SDM decision and will be reviewing the use of corrective case plans within the team before the end of June.
- A number of problem solving sessions have been held within the team and with the SDMs to identify barriers to progressing cases. From June, managers within Threshold will be taking a more targeted approach to reviewing case progression for cases nearing and over KPI. The Operational Manager in Investigations is also providing support to review cases suitable for transfer to the Investigations stage

Investigations

- The HCPC's Investigation team managing the normal flow of cases is performing relatively well with 70% of cases within KPI. This is an increase from last month when 63% of cases were within KPI. The majority of cases waiting for ICP are over KPI and this reflects the work done by the team to progress the oldest cases through to the ICP stage of the process. The in-house team have a relatively small active caseload and for that reason we have re-balanced the caseload via the direct referral of Threshold met cases.
- The HPC's backlog team (that was created in September 2020) is reported separately as by the very nature of this team the cases are older. At its inception the backlog team took on some aged cases from the Threshold team which when transferred to Investigations sat within the latter team's KPI.

SCT

- Of the in-house SCT cases behind target, only 10 are not subject to a third party investigation.

Age range of case

Volume of Cases (Case age looks only at cases in their current state)

Data Date Pre/Post ICP	1.Current (May)			2.Prior (Apr)			3.Two Months Prior (Mar)		
	Median Weeks With Team	Max Weeks with Team	Min Weeks with Team	Median Weeks With Team	Max Weeks with Team	Min Weeks with Team	Median Weeks With Team	Max Weeks with Team	Min Weeks with Team
<input type="checkbox"/> Pre-ICP	21	211	0	22	207	0	23	202	0
<input type="checkbox"/> 1. Triage	1	2	0	2	16	0	1	2	0
Triage	1	2	0	2	16	0	1	2	0
<input type="checkbox"/> 2. Threshold	15	75	0	15	84	0	18	78	0
External law firms	38	72	10	35	84	6	29	78	4
Inhouse	11	75	0	10	69	0	8	58	0
<input type="checkbox"/> 3. Investigations	28	151	0	31	147	1	31	158	0
External law firms	9	76	1	5	55	1	1	49	0
In-house backlog team	61	150	12	53	146	29	49	140	23
In-house case teams	11	151	0	12	147	1	10	141	0
Pending ICP (Internal)	25	109	2	28	105	5	23	158	4
<input type="checkbox"/> 4 SCT	41	211	1	40	207	1	42	202	0
External law firms	50	143	5	45	139	1	43	133	0
In-house SCT	26	211	1	35	207	1	31	202	8
Pending ICP (Internal)	50	91	19	45	198	16	47	72	10
<input type="checkbox"/> Post-ICP	38	296	0	40	292	0	37	286	0
<input type="checkbox"/> 5. Post-ICP	38	296	0	40	292	0	37	286	0
External law firms	0	33	0	0	29	0	0	24	0
Inhouse	41	296	1	41	292	0	38	286	0
Total	25	296	0	26	292	0	26	286	0

Analysis

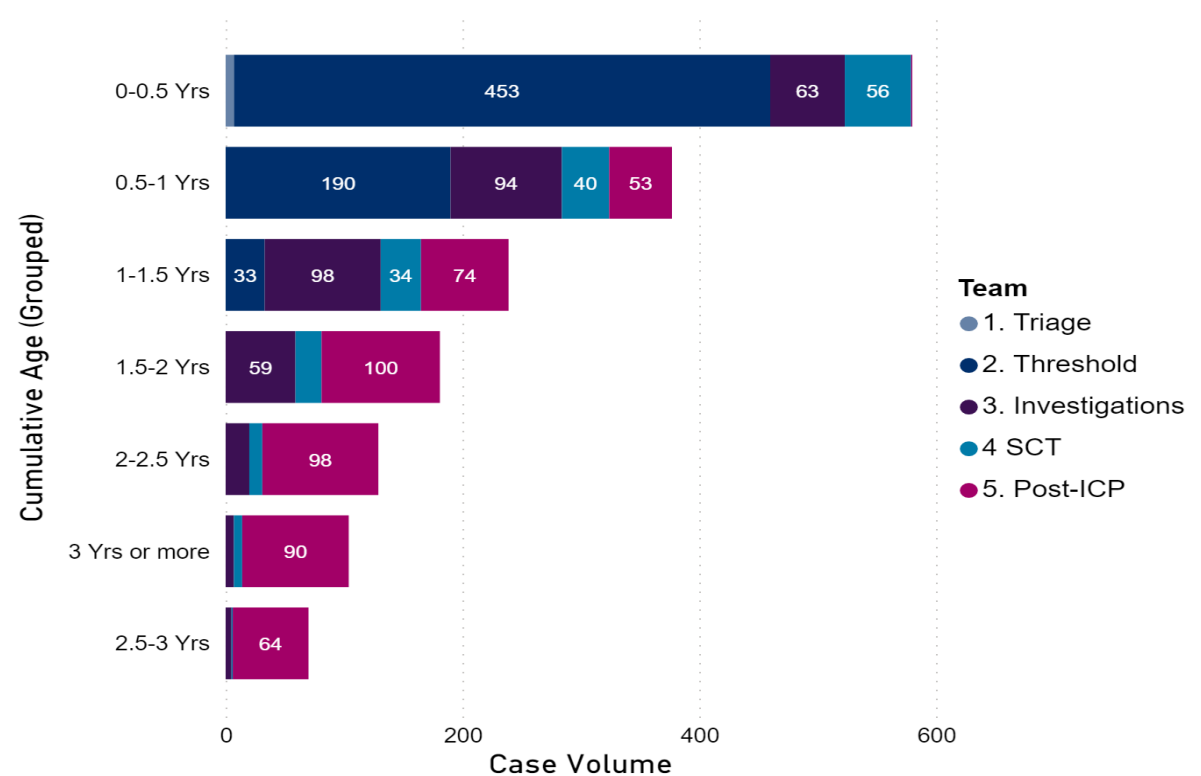
- **Triage:** The data shows that Triage cases in May have been managed within KPI.
- **Threshold:** The oldest case in the in-house Threshold team is with the Senior Decision Makers pending a decision. The next oldest case with the Threshold team is 48 weeks old.
- **Investigations:** The current oldest in-house case (151 weeks) was considered by an ICP in April but adjourned for further information. The oldest case in Investigations that does not have a future ICP is 99 weeks old.
- **SCT:** The SCT have progressed a number of cases to IPC in May increasing the number of pending cases at this stage. The oldest case in-house (209 weeks) is subject to a third party investigation. The oldest case in-house with SCT that is not subject to a third party investigation and does not have a future ICP date is 77 weeks.

Cumulative age of cases

Overall Cumulative Age (Weeks)

Team	Cumulative Target	Median Cumulative Age	Max Cumulative Age	Min Cumulative Age
1. Triage	2	1	2	0
2. Threshold	12	16	75	1
External law firms	12	39	73	10
Inhouse	12	12	75	1
3. Investigations	32	57	273	6
External law firms	32	43	95	32
In-house backlog team	32	84	273	52
In-house case teams	32	29	159	6
Pending ICP (Internal)	32	43	139	10
4 SCT	22	45	247	1
External law firms	22	55	201	6
In-house SCT	22	28	247	1
Pending ICP (Internal)	22	50	91	20
5. Post-ICP	71	107	386	14
External law firms	71	49	113	35
Inhouse	71	110	386	14

Volume of cases by age and stage

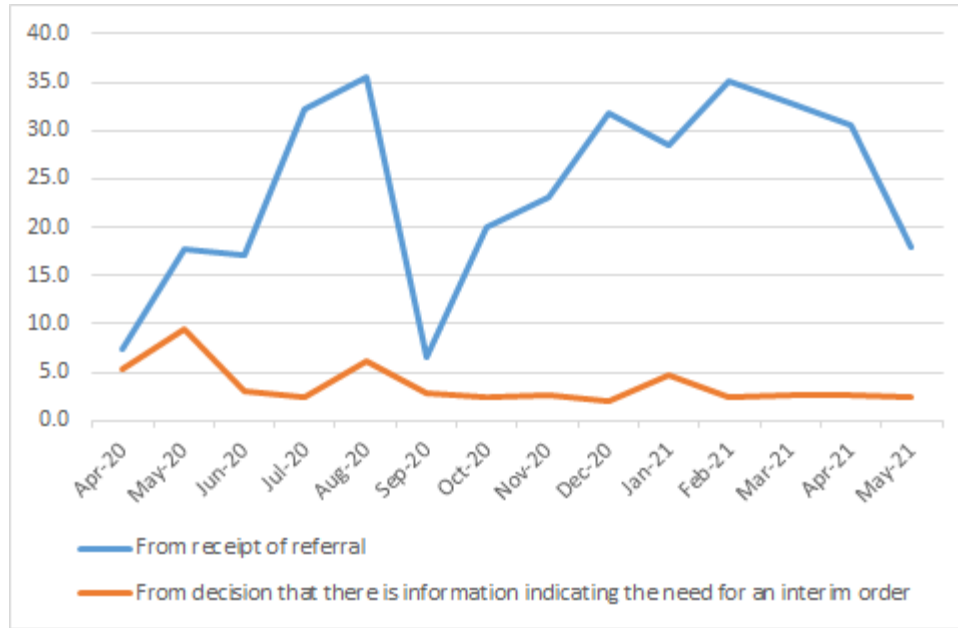


Analysis

- As we would expect, the majority of our caseload is at the earliest stages in the process, and most of our oldest cases are in the post-ICP stage. However, there is still a significant number of aged cases in the pre-ICP stage in the process that we need to reduced. The median age of the in-house threshold team meets KPI as the volume of new cases received balances out the number of cases over KPI. The oldest case relates to an ongoing employer investigation.
- The median cumulative age of cases in the in-house investigations team is below the target for the first time. The oldest case in Investigations not pending an ICP is 100 weeks. The majority of aged cases with the in-house SCT team are subject to third party investigations. Of those which can be progressed, the age of the oldest case which is not listed for an ICP is 52 weeks.
- Post-ICP the median age of cases is noticeably above KPI. This reflects the ongoing impact of the pandemic on our ability to conclude final hearings last year. We would expect the median age of cases post ICP to remain above KPI as the aged cases from earlier in the process move through to the final hearing stage.

Note: Data presented excludes Rule 12 cases which are cases we are unable to progress due to ongoing criminal investigations. Except for IO cases relating to criminal investigations where these are included due to ensure enhanced monitoring and oversight.

Interim order performance



	From receipt of referral (Weeks)	From decision that there is information indicating the need for an interim order (Weeks)
Apr-20	7.4	5.4
May-20	17.7	9.4
Jun-20	17.1	3.1
Jul-20	32.1	2.5
Aug-20	35.4	6.2
Sep-20	6.6	2.8
Oct-20	20.0	2.4
Nov-20	23.1	2.7
Dec-20	31.7	1.9
Jan-21	28.5	4.7
Feb-21	35.1	2.5
Mar-21	32.9	2.6
Apr-21	30.6	2.7
May-21	17.9	2.5

Analysis

- This data shows the length of time (in weeks) it has taken us to seek an interim order from a panel. It reflects how quickly we take action when we identify that a registrant may present a serious or immediate risk to public safety, the public interest or their own interest.
- We currently report this data on a quarterly basis to the PSA. We are now able to provide monthly data for SMT and Council, which will make it easier to monitor our performance and identify issues as they emerge. We have provided monthly figures going back to April 2020 to show the trend over the last year. We will continue to provide the data showing a rolling 12 month baseline for comparison.
- Our performance in this area is starting to improve. The length of time it has taken from receipt of a concern to consideration by the panel has decreased month on month since March. There has been a significant improvement in performance in May where the median from receipt of referral to the IO panel was 17.9 weeks, a reduction of 12.7 weeks from April. This is the lowest median for this measure since September 2020.
- The length of time it has taken for an interim order to be considered by a panel once we have received information that gives rise to the need for an order has decreased slightly in May compared to the previous month. This measure has remained consistently low over the past three months.

Protection of Title cases

Protection of title cases	Open cases	Open over KPI (60 days)	Closed in month	Average Length of time receipt to closure	Shortest time to closure	Longest time to closure
May 2021	78	54	20	16 weeks	5 days	150 weeks
April 2021	74	36	28	27 weeks	7 days	195 weeks

Analysis:

- The number of open POT cases at the end of May is in line with the position at the end of April, but the number of cases over KPI has noticeably increased. The number of closures in May is slightly lower than April and the average length of time from receipt to closure has reduced in May from April, which indicates that newer cases are being prioritised for progression to closure over the older cases. Reducing the number of older cases is a team priority in their 100 day plan.
- COVID has also impacted our ability to progress a number of POT cases as a number of the premises we have been writing to as the official address of a respondent have been closed during the various lockdowns over the last year. We also have a number of long running cases involving third party websites that are time consuming to resolve. A workplan activity for Q3 is to undertake an evidence-based review of our POT KPI and review our approaches to managing cases involving third party websites, including how we can work with other organisations where there is a regulatory overlap e.g. Advertising Standards Authority.