



ORIGINATOR: CHIEF CONSTABLE

PAPER NO: AP22/07

SUBMITTED TO: ACCOUNTABILITY AND PERFORMANCE PANEL –
14 JANUARY 2022

SUBJECT: COMPLAINTS AND PROFESSIONAL STANDARDS UPDATE

SUMMARY:

1. This report relates to Complaints, Misconduct and Professional Standards information for the period 1 April 2021 to 30 September 2021.
2. The report provides the following information: -
 - Complaints about Police Officers and Police Staff
 - Organisational Learning
 - Complaints Training
 - Reviews
 - Reflective Practice Review Process
 - Discipline Outcomes

RECOMMENDATION:

1. The Accountability and Performance Panel is asked to note the contents of this report.

DETAIL OF THE SUBMISSION

1. KEY ISSUES FOR CONSIDERATION:

- 1.1 The legislative framework governing the recording and management of public complaints is the Police Reform Act 2002. Aspects of this legislation have been amended by the Police Reform and Social Responsibility Act 2011, and subsequently the Policing and Crime Act 2017. The latter made significant changes to the police complaints system with the aim to achieve a more customer-focussed complaints system.
- 1.2 From 1 February 2020 Forces are required to log and report complaints about a much wider range of issues including the service provided by the police as an organisation, handled outside of Schedule 3 of the PRA 2002.
- 1.3 The Office of the Police and Crime Commissioner is now responsible for conducting reviews on all complaints recorded under the new regulations where they are the relevant review body.
- 1.4 A total of 198 complaints were received in the reporting period, 1 April 2021 to 30 September 2021. Of these complaints, 151 were recorded under Schedule 3 of the PRA 2020 and 47 were logged outside of Schedule 3 of the PRA 2002.
- 1.5 This is a decrease of 12% compared to the same period last year.
- 1.6 The largest area of complaints has been recorded under the category of Delivery of duties and service. Of the 574 allegations recorded, 209 have been recorded under this category and this is 36.4% of the total.
- 1.7 The IOPC Statutory Guidance states that complaints should be logged and the complainant contacted 'as soon as possible'. Of the 198 complaints received under the new regulations, 84.8% were logged within 2 working days and 42.7% of complainants were contacted within 10 working days.
- 1.8 Of the allegations recorded, 22 have been made alleging discrimination. Of these, 13 have been made under the protected characteristic of race which is 59%.
- 1.9 Learning identified from complaints is detailed within this report, together with common themes relating to individual learning.
- 1.10 Coronavirus and the lockdown measures have impacted policing significantly since March 2020, and this is detailed within this report.

2. FINANCIAL IMPLICATIONS

- 2.1 There are no significant financial issues associated with this report.

3. OTHER IMPLICATIONS AND RISKS

- 3.1 There are no significant risks in relation to this report.



SUFFOLK CONSTABULARY

PROFESSIONAL STANDARDS DEPARTMENT

COMPLAINTS OVERVIEW

1 April to 30 September 2021

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Introduction

This report presents figures on complaints relating to Suffolk Constabulary, received during the period, 1 April to 30 September 2021. These complaints are made by members of the public in relation to the conduct of those serving in the Force and recorded under Schedule 3 of the Police Reform Act (PRA) 2002.

The Policing and Crime Act 2017 made significant changes to the police complaints system to achieve a more customer-focussed complaints system. From 1 February 2020 Forces were required to log and report complaints about a much wider range of issues including the service provided by the police as an organisation, handled outside of Schedule 3 of the PRA 2002.

Data for this report is extracted from the Professional Standards Department live case management system.

This report will make mention of several terms. They are explained below:

Schedule 3: - The complaint must be recorded and handled under Schedule 3 of the legislation if the complainant wishes it to be or if it meets certain criteria as defined within the guidance.

Outside of Schedule 3: - The complaint can be logged and handled outside of Schedule 3 with a view to resolving the matter promptly and to the satisfaction of the complainant without the need for detailed enquiries to address the concerns.

Complaint: - Any expression of dissatisfaction with police expressed by or on behalf of a member of the public. Nationally complaints are grouped under specific categories and sub-categories as directed by the IOPC (see pages 37-39 for the full list of categories).

Allegation: - Complaints are made up of allegations. Alleged behaviour from officers/staff which has resulted in dissatisfaction and a complaint can contain any number of allegations.

A full explanation can be found in the IOPC Statutory Guidance at the following link:
[Statutory guidance | Independent Office for Police Conduct](#)

Executive Summary

- A total of 198 complaints were received in the reporting period, 1 April to 30 September 2021. Of these complaints, 151 were recorded under Schedule 3 and 47 were logged outside of Schedule 3 of the PRA 2002.

In the same period in 2020/21, 226 complaints were received and of these, 145 were recorded under Schedule 3 and 81 were logged outside of Schedule 3.

This is a decrease in complaints of 12% compared to the same period last year.

- The Independent Police Complaints Commission (IOPC) introduced new categories and sub-categories of complaint allegations which came into force with the new Regulations. This report details the categories and sub-categories, and the totals recorded on complaints received in the period.

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The largest area of complaint has been recorded under the category of Delivery of duties and service. Of the 574 allegations recorded in the reporting period, 209 have been recorded under this category, which is 36.4% of the total.

The types of complaint recorded under Delivery of duties and service relate to the service received, the action of officers following contact received, operational and organisational decisions, information provided and the general level of service.

The sub-categories of complaint were introduced in order to better understand the concerns raised by the complainant. Of the complaint allegations recorded, the top 5 sub-categories of complaint across the Force are:

- A1 Police action following contact (131 allegations – 22.8%)
- B4 Use of force (42 allegations – 7.3%)
- A2 Decisions (38 allegations – 6.6%)
- H1 Impolite language/tone (38 allegations – 6.6%)
- H4 Lack of fairness and impartiality (37 allegations – 6.4%)

Examples of the categories of complaint are included within the report.

- Chapter 6 of the IOPC Statutory Guidance states that complaints should be logged and the complainant contacted 'as soon as possible'. Of the 198 complaints received under new Regulations, 84.8% were logged within 2 working days and 42.7% of complainants were contacted within 10 working days. Figures for complaints received in October and November 2021, show that 83.6% of complainants have been contacted within 10 working days which would suggest measures implemented to improve timeliness are having a positive impact.
- Complaints recorded under Schedule 3 are handled reasonably and proportionately by way of investigation, otherwise than by investigation (responding to concerns raised and seeking to resolve them) or by taking no further action. A total of 132 complaints have been finalised in the reporting period and of those, 12.9% were investigated, 47% were otherwise than by investigation and 31.8% were resulted as no further action as they were assessed that the complaint had already been addressed or that there was insufficient information to progress. The remaining 8.3% of complaints were either withdrawn or discontinued under Regulation 41 (complainant decided not to proceed with the complaint).
- The outcome for complaints handled outside of Schedule 3 will be either resolved or not resolved. Of the 58 complaints finalised in the reporting period, 52 were resolved which is 90% of cases. The 6 cases not resolved is 10% of complaints finalised. If the complaint handler is unable to resolve the matter the complainant is able to ask for their complaint to be recorded under Schedule 3.
- All allegations which are linked to a police officer or member of police staff will be finalised with an action as a result. Actions can include offering an apology/acknowledging that something went wrong, individual and organisational learning and review of policy/procedures. Details are provided in this report of the actions taken where it was determined that the service provided was acceptable, and where the service provided was not acceptable under Schedule 3, and also complaints resolved outside of Schedule 3.

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- A member of the public is considered a complainant if they are directly or adversely affected by the conduct, witnessed the conduct or are acting on behalf of someone who meets the criteria of a complainant. As such, more than one complainant can be recorded on a complaint case. A total of 206 complainants have made the 198 complaints recording in the reporting period. The ethnicity of complainant has been recorded where it has been provided and for the reporting period this is 74% of cases which is comparable with the same period last year.

Of the 206 complainants recorded on the 198 complaint cases, their ethnicity and gender is as follows:

- 7.3% are BAME male
- 3.4% are BAME female
- 38.3% are White male
- 23.3% are White female
- 15.5% are unknown male
- 12.1% are unknown female

- Of the total 574 allegations recorded, 22 have been made alleging discrimination. Of these, 13 have been made under the protected characteristic of race which is 59%. The complainants feel the service they received was not acceptable, or they were treated less favourably, due to their ethnicity or ethnic appearance.
- A total of 261 police officers, Special Constables and members of police staff are identified on the complaints recorded. Of the 252 police officers and Special Constables, 3.6% are BAME, 93.7% are White and 2.8% are unknown.
- The learning identified from complaints, internal investigations and other matters referred to PSD are summarised and grouped within themes later in this report.

IOPC data capture

The IOPC recently published their Annual Report of Police Complaints for 2020/21. These are experimental statistics¹ as this is the first year of reporting on the changes to the complaints system. Alongside the Annual Report, the IOPC have published the Q4 data for each Force which has allowed us the first opportunity to review how data is being captured for other Forces including our most similar Forces group and nationally. From this, we have identified areas where there may be some discrepancies in our interpretation relating to recording complaint allegation sub-categories which are being addressed, such as establishing what constitutes an allegation being recorded as police contact as opposed to a general level of service provided. The data remains under continual review and this will be assisted with regular publications from the IOPC.

¹ The Office for National Statistics describes these as 'a series of statistics that are in a testing phase and not yet fully developed'.

Access to the complaints process

A significant amount of work has been ongoing to improve the accessibility of the complaints process.

Leaflets and Posters

Leaflets have been produced which provide members of the public with simple advice about how they can make a complaint against the police and the relevant processes that follow. The leaflets have been distributed to all custody suites and public enquiry offices across Norfolk and Suffolk.

We have updated the information available on our internet to ensure the advice and guidance is reflective of the reforms to the complaint regulations, and of the guidance in the leaflets.

A poster has been produced providing a snapshot of methods that can be used by members of the public to make a complaint and directs them to the website link above which provides further information. This poster should be available for distribution now and will be circulated to various partners agencies and other venues which may support our aim of increasing access to the complaints process. This work is currently being undertaken.

Coronavirus

Coronavirus and the lockdown measures have impacted policing significantly and in order to measure the number of complaints made about the use of police powers on the restrictions, police powers on infected persons and Coronavirus other (where the use of the powers are not the issue, but the coronavirus has still impacted the incident in some way), the IOPC created national factors to capture this information.

Several restrictions were lifted during the reporting period and the number of complaints recorded linked to Coronavirus has reduced.

A total of 7 complaints were recorded between 1 April and 30 September 2021 linked to Coronavirus, which is 3.5% of all complaints recorded.

Of the 7 complaints, 6 were recorded as Schedule 3 complaints and 1 was logged outside of Schedule 3.

The complaints contain a total of 7 separate allegations:

- 5 relate to not wearing PPE/exposing complainant to risk
- 1 relates to the action taken by officers to establish if a breach of restrictions had taken place
- 1 relates to an allegation officers failed to take action in relation to a breach of the restrictions

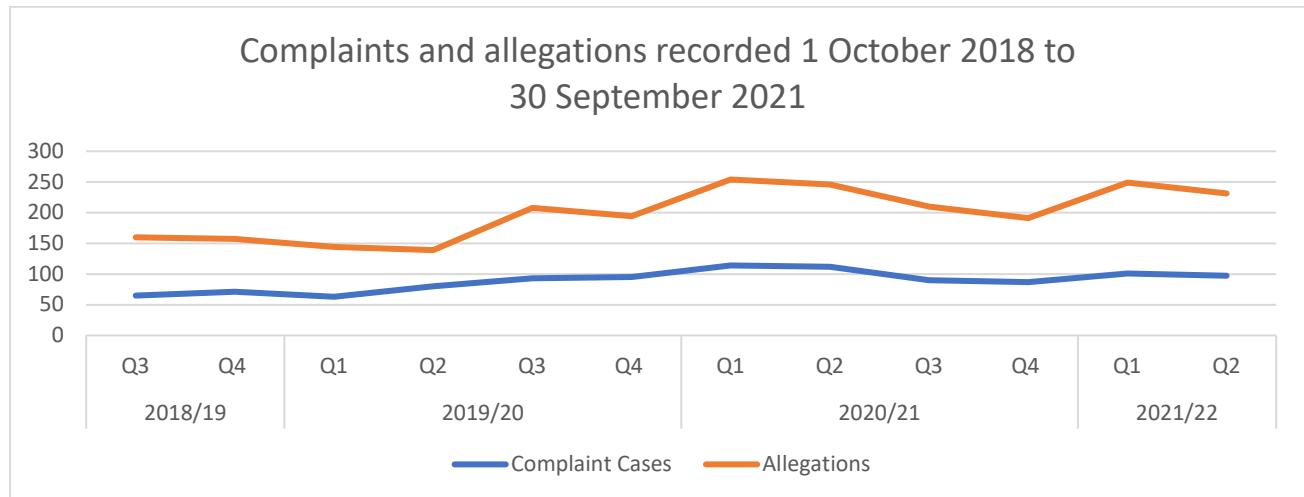
Of the 7 complaints recorded, 5 have been finalised to date. Of these 5 complaints finalised:

- 2 were determined that the service provided was acceptable
- 2 resulted in no further action being taken as in both cases the concerns had already been addressed outside of the complaints process
- 1 was resolved outside of Schedule 3

Complaint Cases

All complaints received in the Professional Standards Department are assessed and either recorded under Schedule 3 of the PRA 2002 or logged outside of Schedule 3.

(Chart 1): The chart below shows all complaint cases received in the reporting period both recorded under Schedule 3 and logged outside of Schedule 3 together with the number of allegations recorded quarterly over the last three years:



(Table 1): The table below shows quarterly the number of complaints received and allegations recorded on the complaint cases:

<u>Year</u>	<u>Quarter</u>	<u>Schedule 3 complaints recorded</u>	<u>Outside Schedule 3 complaints logged</u>	<u>Total complaints received</u>	<u>Allegations Recorded</u>
2018/19	Q3	65	N/A	65	160
	Q4	71	N/A	71	157
2019/20	Q1	63	N/A	63	144
	Q2	80	N/A	80	139
	Q3	93	N/A	93	208
	Q4	73	22	95	194
2020/21	Q1	74	40	114	254
	Q2	71	41	112	246
	Q3	62	28	90	210
	Q4	56	31	87	191
2021/22	Q1	78	23	101	249
	Q2	73	24	97	231

The introduction of new Regulations on 1 February 2020 (within Q4 2019/20) requires Forces to log complaints received which are suitable for handling outside of Schedule 3 and the table above details the complaints recorded under Schedule 3 and logged outside Schedule 3. The table shows the increases in the total complaint cases recorded.

All complaints recorded under old Regulations are recorded under Schedule 3 of the Police Reform Act.

Schedule 3 and outside Schedule 3 complaints

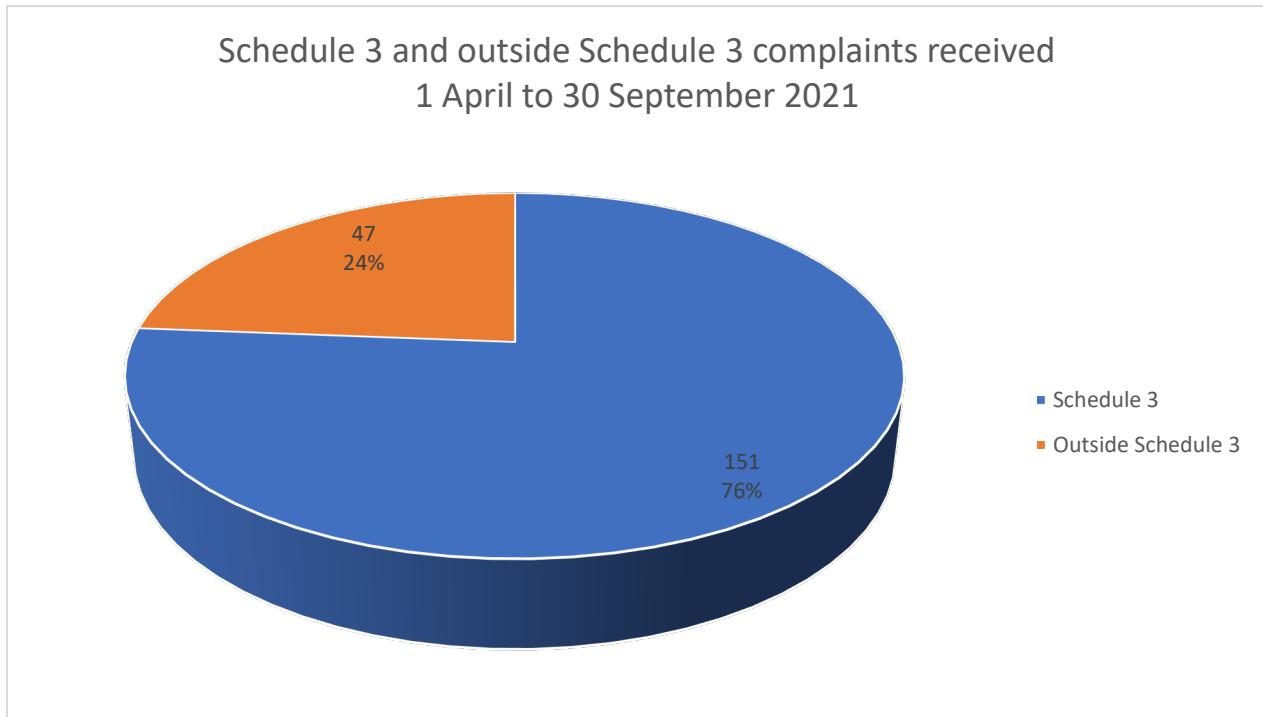
The IOPC Statutory Guidance states:

A complaint must be recorded under Schedule 3 to the *Police Reform Act 2002*, and handled in accordance with the provisions of that Schedule, if at any point the person making the complaint wants it to be recorded. This applies even if previous attempts have been made to handle the complaint outside of the requirements of Schedule 3. Where a complainant's wishes are unclear, reasonable steps should be taken to clarify what they are.

A complaint must also be recorded and handled under Schedule 3 if the chief officer or local policing body (where it is the appropriate authority or it has taken on responsibility for the initial handling of complaints) decides that it is appropriate or if the complaint:

- is an allegation that the conduct or other matter complained of resulted in death or serious injury
- is an allegation that, if proved, might constitute a criminal offence by a person serving with the police or justify the bringing of disciplinary proceedings
- is about conduct or any other matter which, if proved, might have involved the infringement of a person's rights under Articles 2 or 3 of the European Convention on Human Rights or
- meets any of the mandatory referral criteria

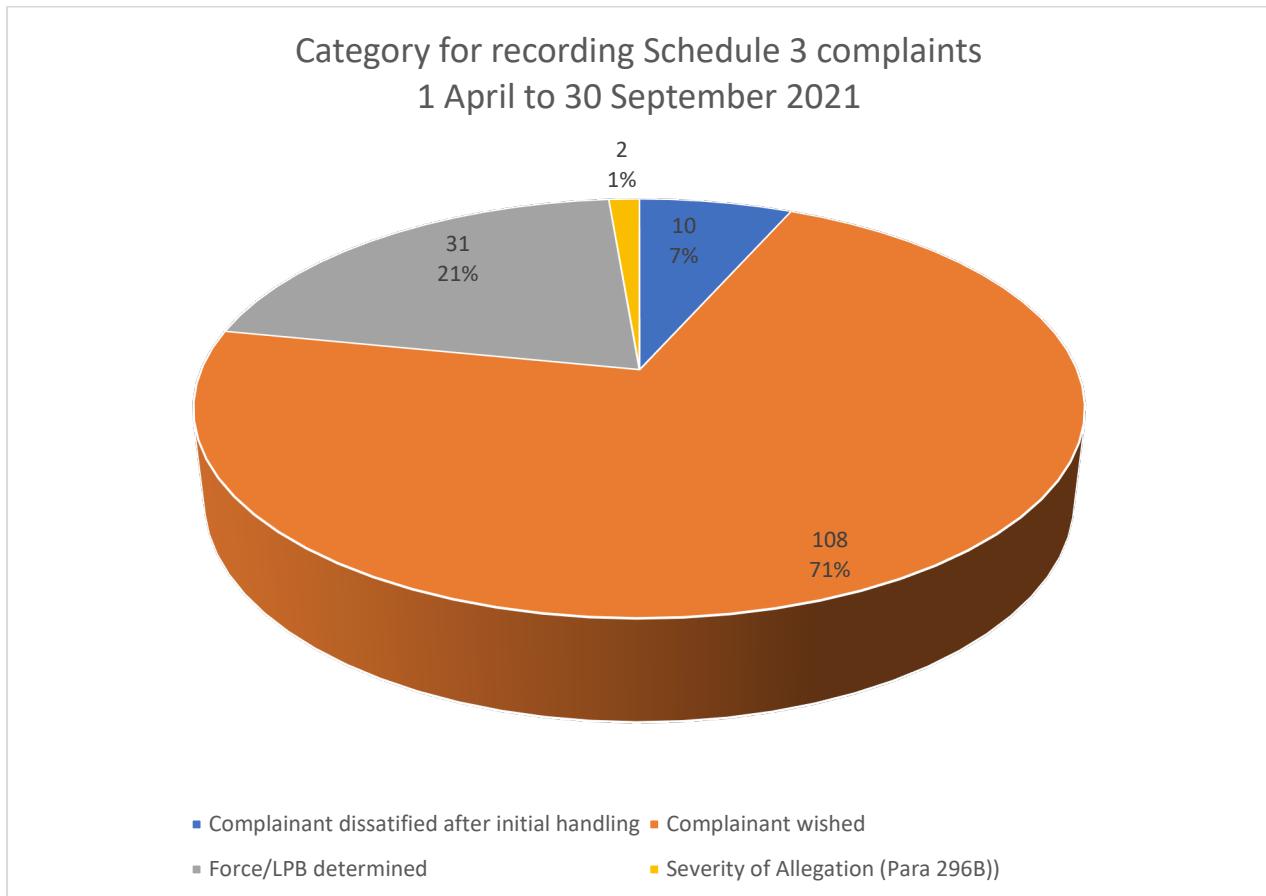
(Chart 2): The pie chart below shows the number and percentage of complaints received in the reporting period and a breakdown of recorded under Schedule 3 of the PRA Act 2002 or logged outside of Schedule 3:



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Schedule 3 complaints are recorded under categories to provide context for the reasons the complaints are recorded as such.

(Chart 3): The pie chart below shows the number and percentage of each of the categories:

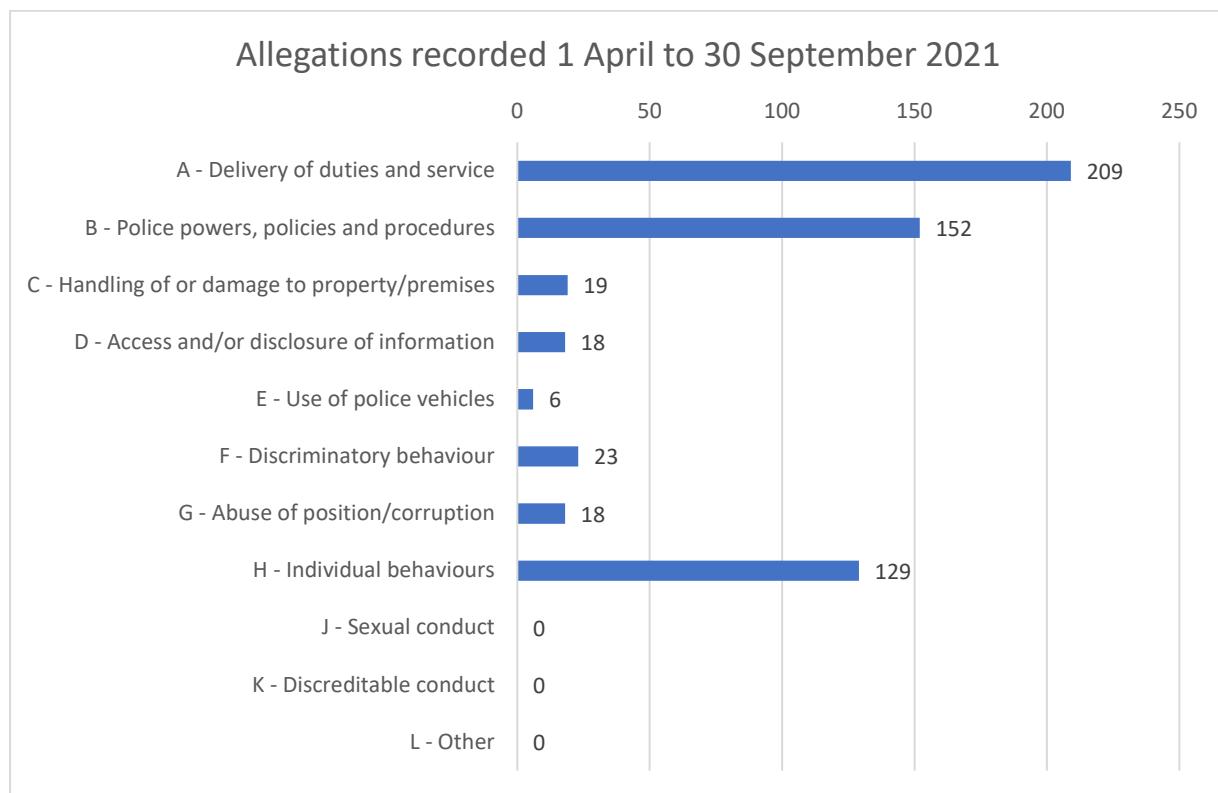


Allegations recorded

An allegation is made by the complainant about the service they have received. Multiple allegations can be recorded on complaint cases and new allegations can be added to complaints at any point during the complaint handling process, following discussion with the complainant to fully identify the allegations.

With the change in Regulations the IOPC devised a new set of 11 categories of complaint.

(Chart 4): The graph below shows the number of allegations under each category, recorded during the reporting period. Some of the allegations will be recorded on complaints logged and recorded prior to the reporting period:



The largest area of complaint has been recorded under the category of Delivery of duties and service. Of the 574 allegations recorded, 209 have been recorded under this category, which is 36.4% of the total.

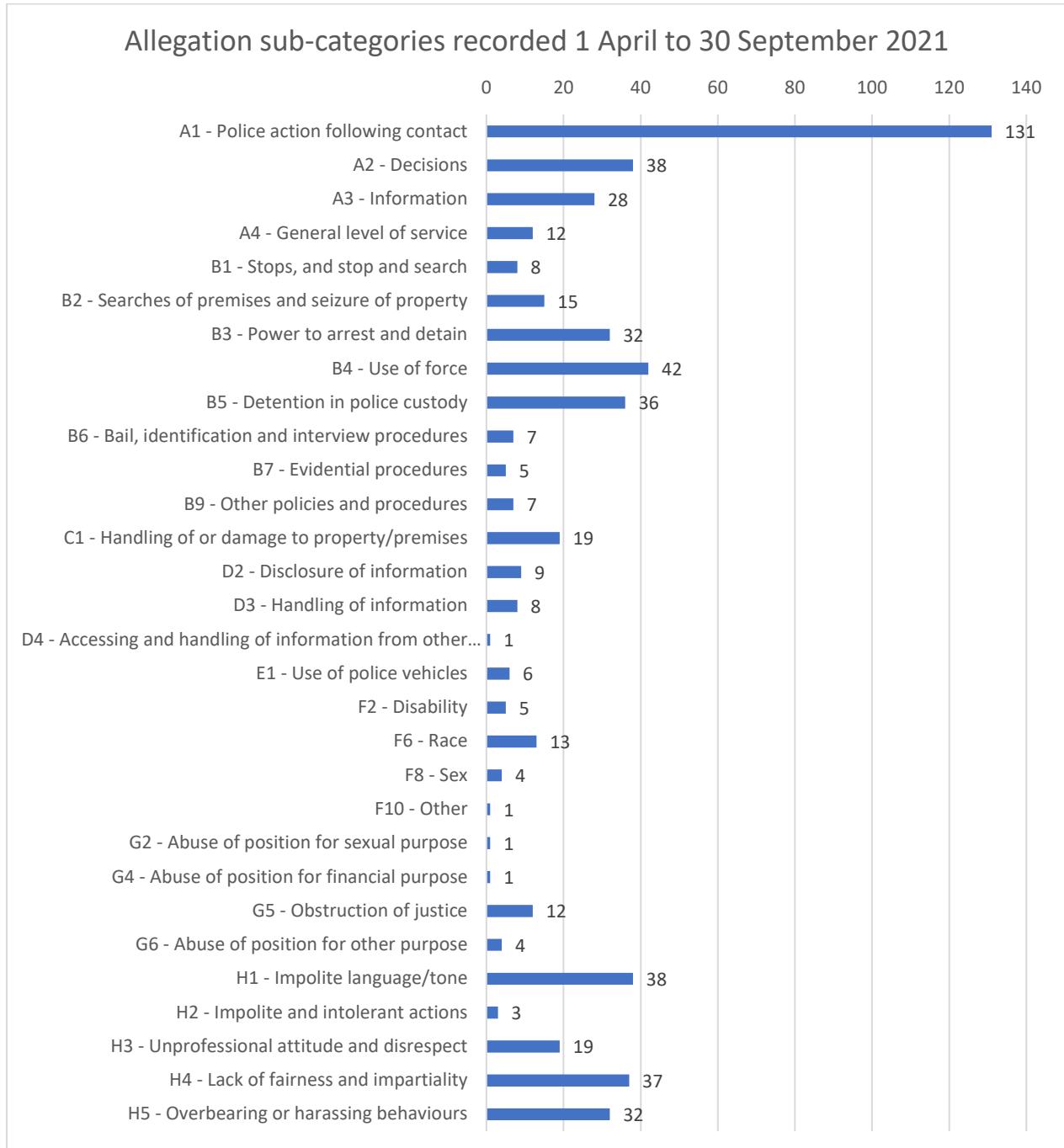
The types of complaint recorded under Delivery of duties and service relate to the service received by the complainant, in terms of the action of officers following contact (the police response to calls from the public), operational and organisational decisions (how the Force decides what action to take), information provided (how we communicate information) and the general level of service provided to the public

This is followed by Police powers, policies and procedures which is 26.5% of all allegations recorded.

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When the IOPC devised the complaint categories they created new sub-categories with a view to better understanding the nature of the complaints made.

(Chart 5): The graph below shows the sub-categories of the 574 allegations recorded in the reporting period:



The largest sub-category recorded is Police action following contact and it shows that 22.8% of allegations are recorded under this category. The types of complaint defined under this category can include:

- No or insufficient action in response to a reported incident. For example: the number of officers deployed to an incident or no officers attended, no action taken by the police, or a failure to investigate.

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- The size, nature or quality of an investigation. This includes allegations that evidence was not sought or obtained, and witnesses were not spoken to.
- No or insufficient response to a communication or other contact with police, such as no response to a letter sent to the chief officer.
- Timeliness of the response (including an investigation) to a reported incident, communication or other contact.

Following review of the IOPC annual statistics we identified that there may be discrepancies in our interpretation relating to the recorded of complaint allegations sub-categories and this is being addressed.

National and local factors

Every allegation recorded has a national and local factor applied to it. The purpose of the factors is to capture the situational context of the dissatisfaction. Multiple factors, both national and local, can be applied to each individual allegation.

(Chart 6): The chart below shows the national factors applied to the 574 allegations recorded in the reporting period:



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The most frequently used national factor is Arrest which has been applied to 130 allegations and is 22.6% of all allegations recorded.

Where the national factor of Arrest is applied to the allegations just over half of the allegations have been recorded under the category of Police powers, policies and procedures, with the largest number being Use of force and the Power to arrest and detain.

- 27% of complaints alleged the use of excessive force
- 24% of complaints are in relation to unlawful/unnecessary arrest and of those finalised to date, none have been upheld

Other issues raised relate to the investigation (failure to secure and/or ask for evidence, failure to update, conclusion/outcome of investigation), property seized (failure to return property, unlawful seizure of property), and allegations the complainants were not cautioned.

The next most frequently used national factor is Investigation and this has been applied to 90 allegations:

- 26% are dissatisfied with the conclusion/outcome of investigation
- 21% relate to a failure to investigate
- 18% relate to a failure to provide an update
- 8% relate to failure to secure and/or ask for evidence
- 8% are made alleging a failure to record the crime
- 6% are dissatisfied with the time taken to investigate

Timeliness for logging complaints and contacting complainants

Chapter 6 of the IOPC Statutory Guidance states that complaints should be logged and the complainant contacted 'as soon as possible'.

The length of time taken to log the complaints in Professional Standards and the time taken to make initial contact with the complainant are both measured.

The logged complaint timescales are from the date the complaint is received in Force to the date it is logged in Professional Standards.

Initial contact is measured from when the complaint is made to the point when initial contact is made with the complainant.

(Table 2): The table below shows the average number of working days to log and make initial contact, broken down quarterly over the reporting period:

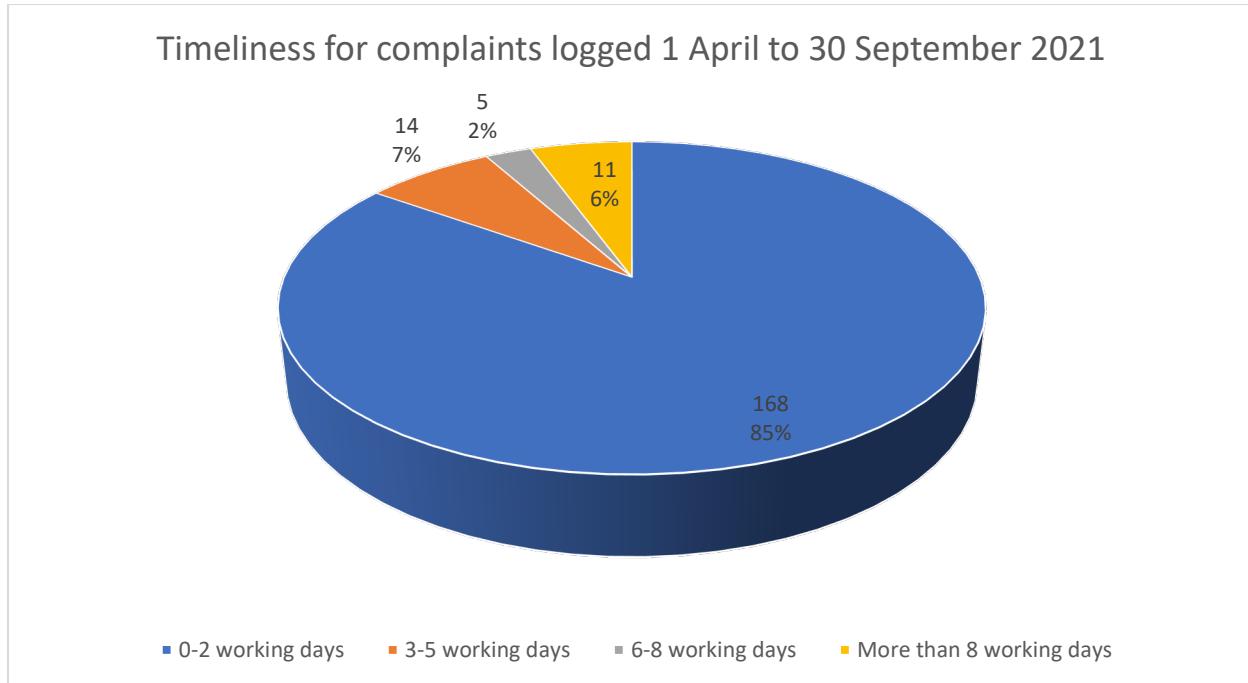
<u>Year</u>	<u>Quarter</u>	<u>Average number of working days to log complaint</u>	<u>Average number of working days to contact complainant</u>
2020/21	Q1	1	4
	Q2	2	8
	Q3	1	10
	Q4	2	15
2021/22	Q1	2	13
	Q2	2	12

(Table 3): The table below details the percentage of cases against the number of working days:

<u>Measure</u>	<u>1 April to 30 September 2020</u>	<u>1 April to 30 September 2021</u>
% of cases logged within 2 working days	89.8%	84.8%
% of cases logged within 3-5 working days	3.6%	7%
% of cases logged within 6-8 working days	4%	2.5%
% of cases logged in more than 8 working days	2.7%	5.6%
% of complainants contacted within 5 working days	58.4%	18.9%
% of complainants contacted within 6-10 working days	31.2%	23.8%
% of complainants contacted in more than 10 working days	10.4%	57.3%

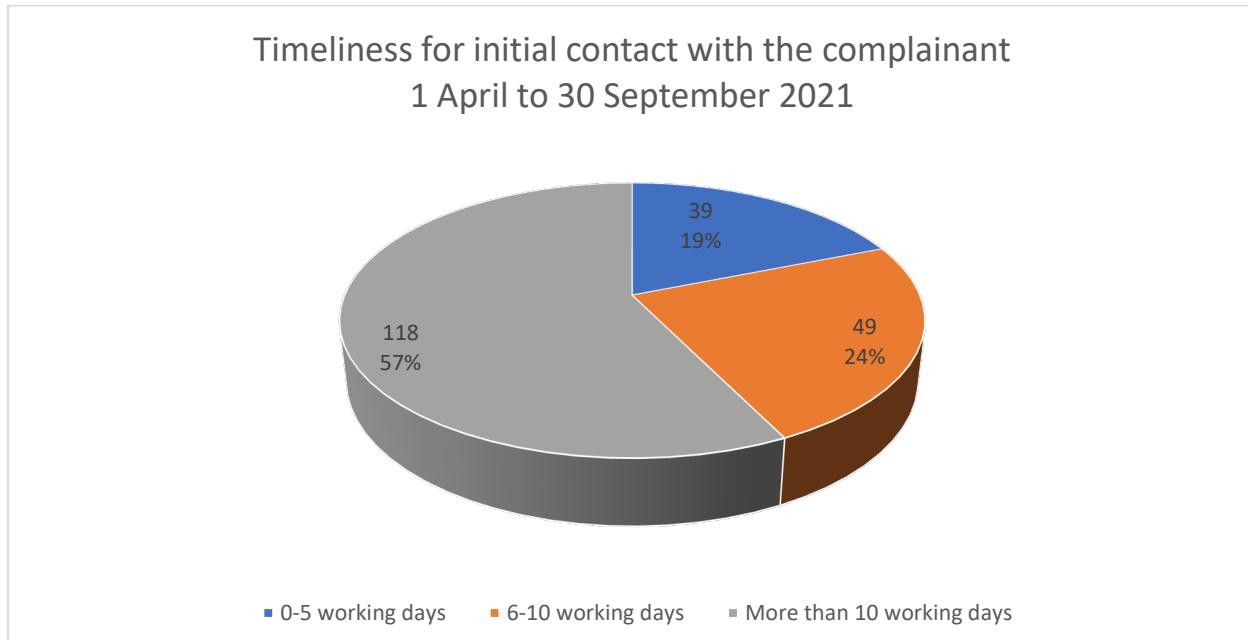
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(Chart 7): The chart below shows the timeliness for complaint cases logged in Professional Standards in the reporting period:



Of the 198 complaints received under new Regulations, 84.8% were logged within 2 working days.

(Chart 8): The following chart shows the timeliness recorded for initial contact with the 206 complainants:



Over the 6-month reporting period, it took on average 12 working days to make initial contact with the complainant.

Some dissatisfaction, which does not meet the criteria for recording a complaint under Schedule 3 of the PRA 2002, may be resolved quickly to the satisfaction of the complainant. There is no requirement to log these expressions of dissatisfaction as police complaints.

Other expressions of dissatisfaction must be logged, provided they meet the following criteria:

- the person making the complaint must be eligible to make a complaint
- the complainant wants the matter formally recorded.

Ideally contact should be made on receipt of the complaint, but this is not always possible. We aim to log and make contact within 1-10 days. Under the old Regulations, the requirement was to record within 10 days and communicate a recording decision within a further 5 days.

Over the reporting period the number of cases logged within 2 working days has remained consistently high at 84.8%.

The number of days to contact the complainant has gone from an average low of 4 days in Q1 2020/21 to an average high of 15 days in Q4 2020/21. The average time to make contact with the complainant over the reporting period was 12 working days.

The percentage of complainants contacted in excess of 10 working days has increased from 10.4% in the period April to September 2020 to 57.3% in the current reporting period. This is not an insignificant increase and has been due in part to the number of contacts received. In the reporting period a total of 1,252 contacts were made to the Joint Professional Standards Department and 1,206 were received within the previous 6 months, resulting in challenges managing the demand with current resources. To seek to make improvements, changes have been made to processes and 2 new roles have been created, Early Intervention Officers.

The Early Intervention Officers will be responsible for managing low level dissatisfaction, utilising the 'Listen, Say Sorry, Fix-it' principle. They will contact complainants at the earliest opportunity to seek to resolve their dissatisfaction outside Schedule 3 and if unable to do so, obtain information to inform the assessment process. This new process will serve to improve significantly the contact times, as well as the level of service provided to complainants.

Complaint and allegation outcomes (Schedule 3)

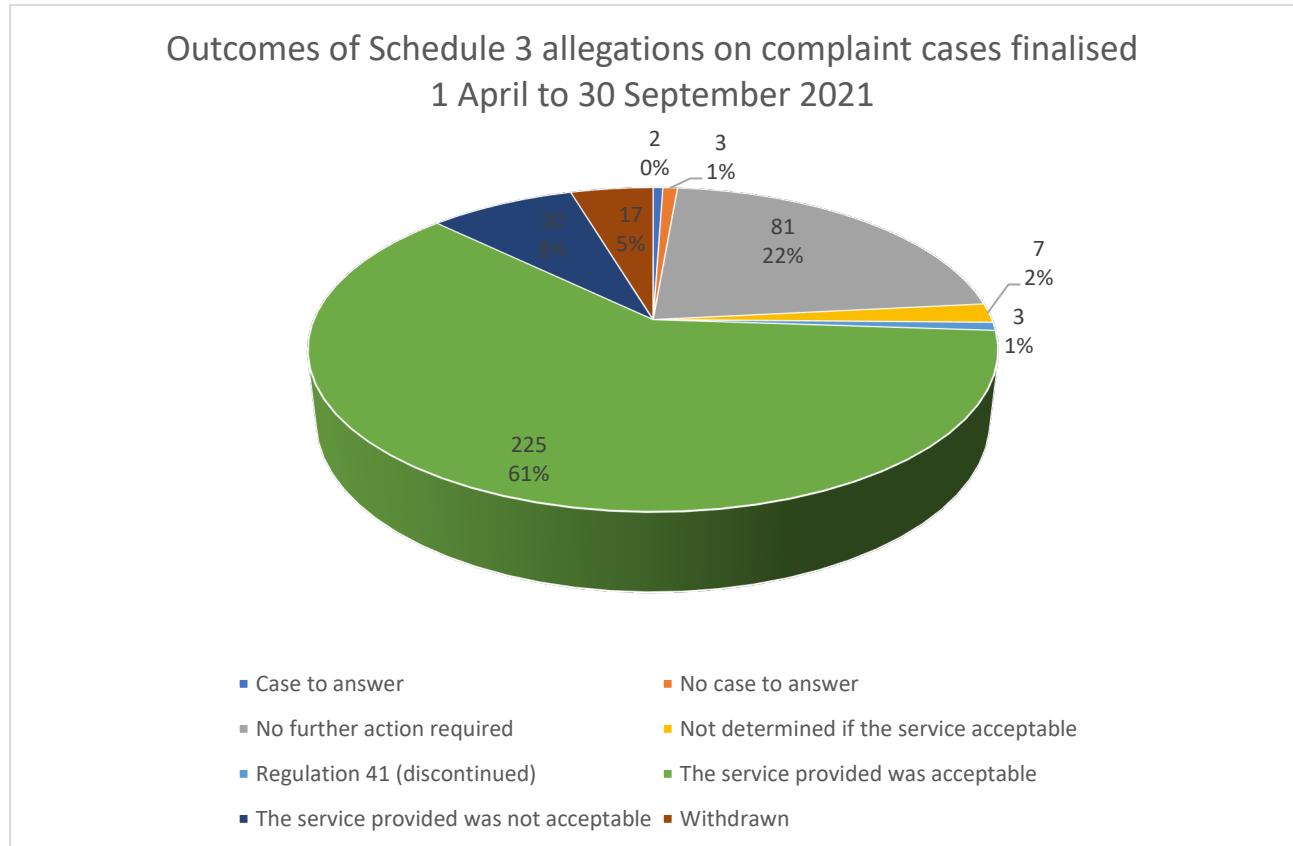
Under new Regulations, Schedule 3 complaints will either be investigated, resolved otherwise than by investigation (responding to concerns raised and seeking to resolve them) or determined that no further action will be taken.

In some cases, the complaint will be withdrawn by the complainant or discontinued under Regulation 41.

(Table 4): A total of 132 complaint cases were resulted under Schedule 3 in the reporting period and the table below shows the way in which the complaint cases have been handled:

<u>Year</u>	<u>Quarter</u>	<u>Investigation</u>	<u>Otherwise than by investigation</u>	<u>No Further Action</u>	<u>Regulation 41 (Discontinued)</u>	<u>Withdrawn</u>
2020/21	Q1	0	11	10	0	0
	Q2	9	26	13	1	1
	Q3	4	35	19	1	0
	Q4	4	32	11	1	5
2021/22	Q1	7	15	18	2	2
	Q2	10	47	24	1	6

(Chart 9): Every complaint contains at least one allegation. The chart below details the outcomes to the 368 complaint allegations finalised under Schedule 3 complaints for the reporting period:

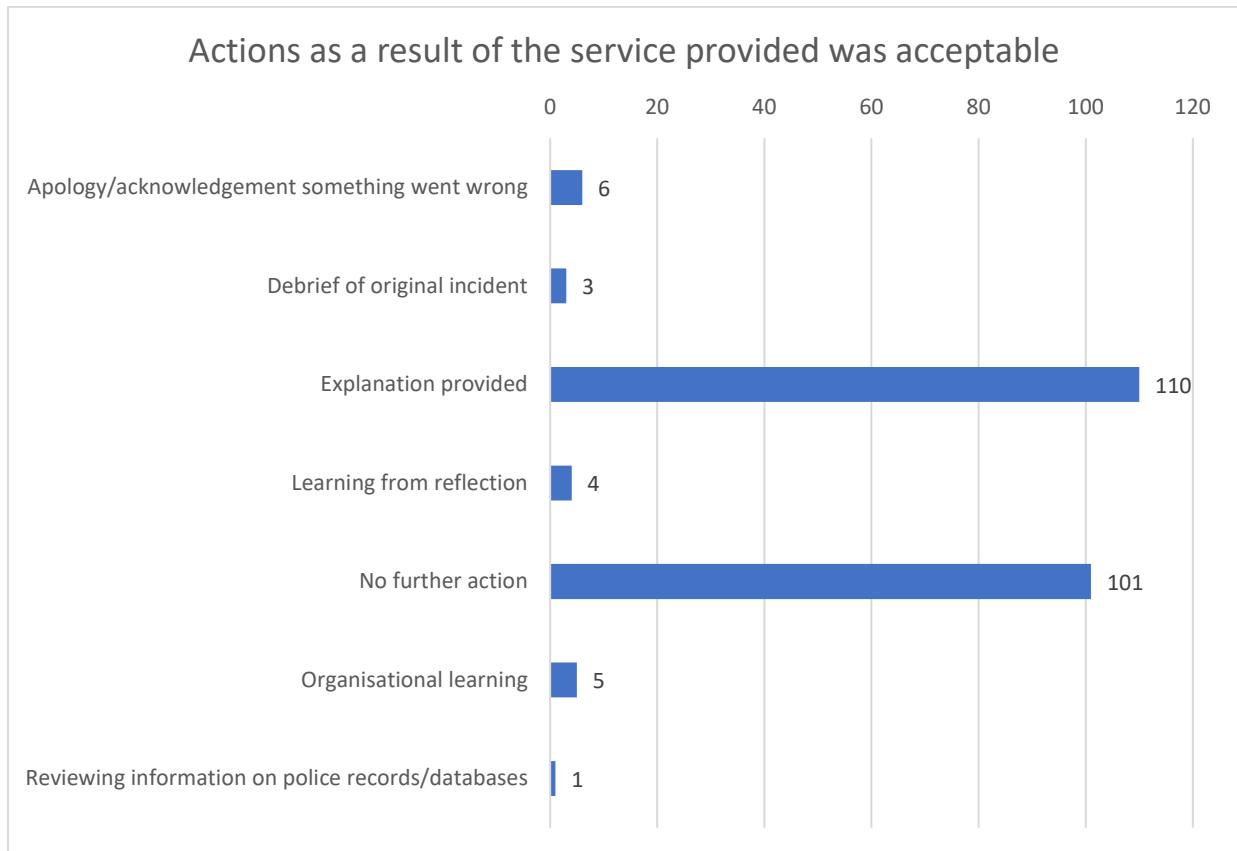


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Allegations resulted under the new Regulations show an action recorded for each allegation, which shows how the matter has been resolved.

Even where it has been determined the service provided was acceptable, there are opportunities to resolve the issues and learn from the complaints in a number of ways.

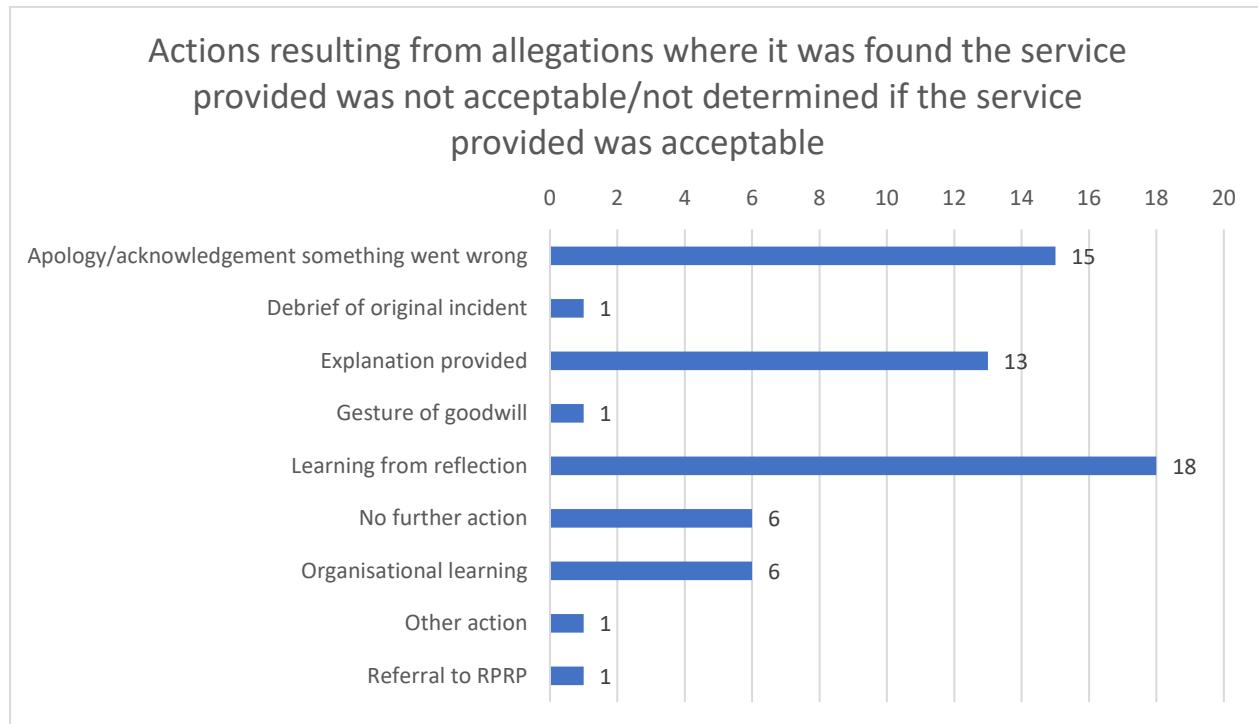
(Chart 10): The graph below shows the actions which have resulted from the 225 allegations where it was found that the service provided was acceptable:



In the majority of cases an explanation was provided to the complainant. Learning for the individuals involved and also the organisation can be identified and, where appropriate, an apology given.

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(Chart 11): It was determined that the service provided was not acceptable for 30 allegations in the reporting period. In a further 7 allegations it could not be determined if the service provided was acceptable or not. In total these 37 allegations have resulted in the following actions:



The actions show that in a number of cases learning for both the individual and the organisation was identified, and an apology was given to the complainant.

All cases handled under Schedule 3 took on average 87 working days to finalise from the date the complaint was made to the date the complainant was informed of the result. This includes any time that the case was suspended due to being sub judice.

The length of time the case was with the complaint handler was on average 43 working days, not including any time the case was suspended.

Reflective practice

The Reflective Practice Review Process (RPRP) encourages officers to reflect and learn from any mistakes or errors and was introduced to increase the emphasis on finding solutions, rather than focussing on a punitive approach. It is not a disciplinary process or a disciplinary outcome.

RPRP is as a result of a determination of Practice Requiring Improvement following an investigation and in the reporting period 2 officers were referred for reflective practice on one complaint case.

Reflective practice is encouraged for all complaints, not just those investigated, and is a process which can be conducted by the complaint handler at any stage during the resolution of a complaint. This was previously captured on the PSD case management system under individual learning however since January 2021 this is now recorded as 'Learning from reflection'

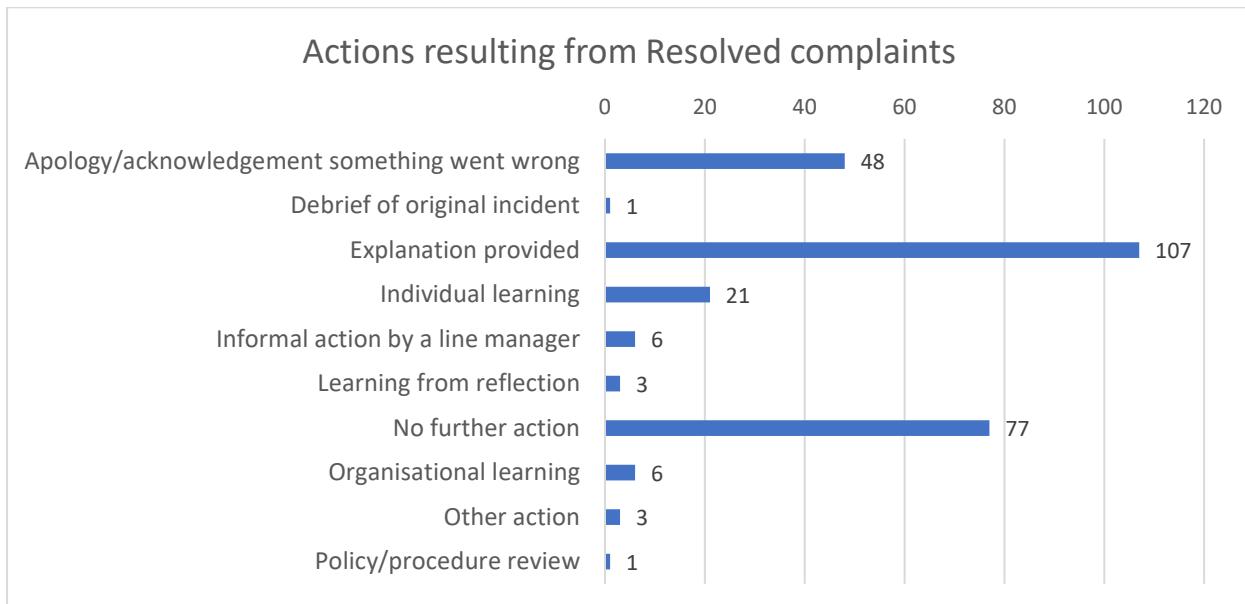
Complaint and allegation outcomes (Outside Schedule 3)

Cases dealt with outside of Schedule 3 of the PRA 2002 are handled with a view to resolving them to the complainant's satisfaction. It allows complaints to be addressed promptly and, in many cases, complainant's may only want an explanation or for their concerns to be noted.

(Table 5): A total of 58 complaint cases were handled outside of Schedule 3 in the reporting period and the table below details the outcomes to those cases:

<u>Year</u>	<u>Quarter</u>	<u>Resolved</u>	<u>Not resolved – No further action</u>
2020/21	Q1	27	2
	Q2	35	3
	Q3	30	3
	Q4	24	5
2021/22	Q1	25	2
	Q2	27	4

(Chart 12): The graph below shows the actions resulting from the 58 complaints which were resolved:



As with complaints handled under Schedule 3, there are opportunities to learn and offer an apology where appropriate. In the majority of cases, an explanation was provided to the complainant.

Where a complaint has been logged outside of Schedule 3, the complainant can request their complaint is recorded under Schedule 3 and in the reporting period, 6 cases were moved to Schedule 3. Data has only recently been collected for this area and therefore comparisons will be made in future reports.

Cases handled outside of Schedule 3 took on average 50 working days to finalise from the date the complaint was made to the date the complainant was informed of the result

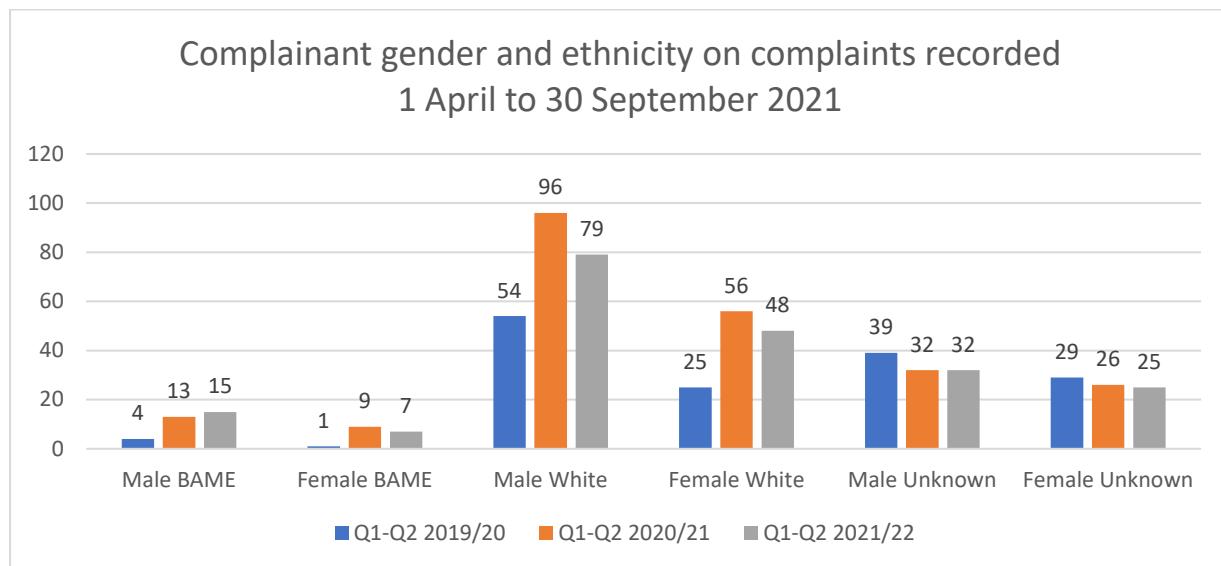
Complainant demographic

A member of the public is considered a complainant if they are directly or adversely affected by the conduct, witnessed the conduct or are acting on behalf of someone who meets the criteria of a complainant. As such, more than one complainant can be recorded on a complaint case.

In the reporting period, 1 April to 30 September 2021, 198 complaint cases were received. A total of 206 individual complainants are recorded as having made the complaints and where known, details of the complainant's gender and ethnicity are recorded.

There is no requirement for complainants to provide their ethnicity when making a complaint. Of the complaints recorded in the reporting period the complainant's ethnicity has been recorded on 74% of cases. This is a slight decrease from 75% of complainants providing their ethnicity in the same period last year but an increase on 55% in Q1 to Q2 2019/20.

(Chart 13): The graph below shows the gender and ethnicity of those making complaints, in comparison with the previous 2 years:



Complaints made by Black, Asian and Minority Ethnic

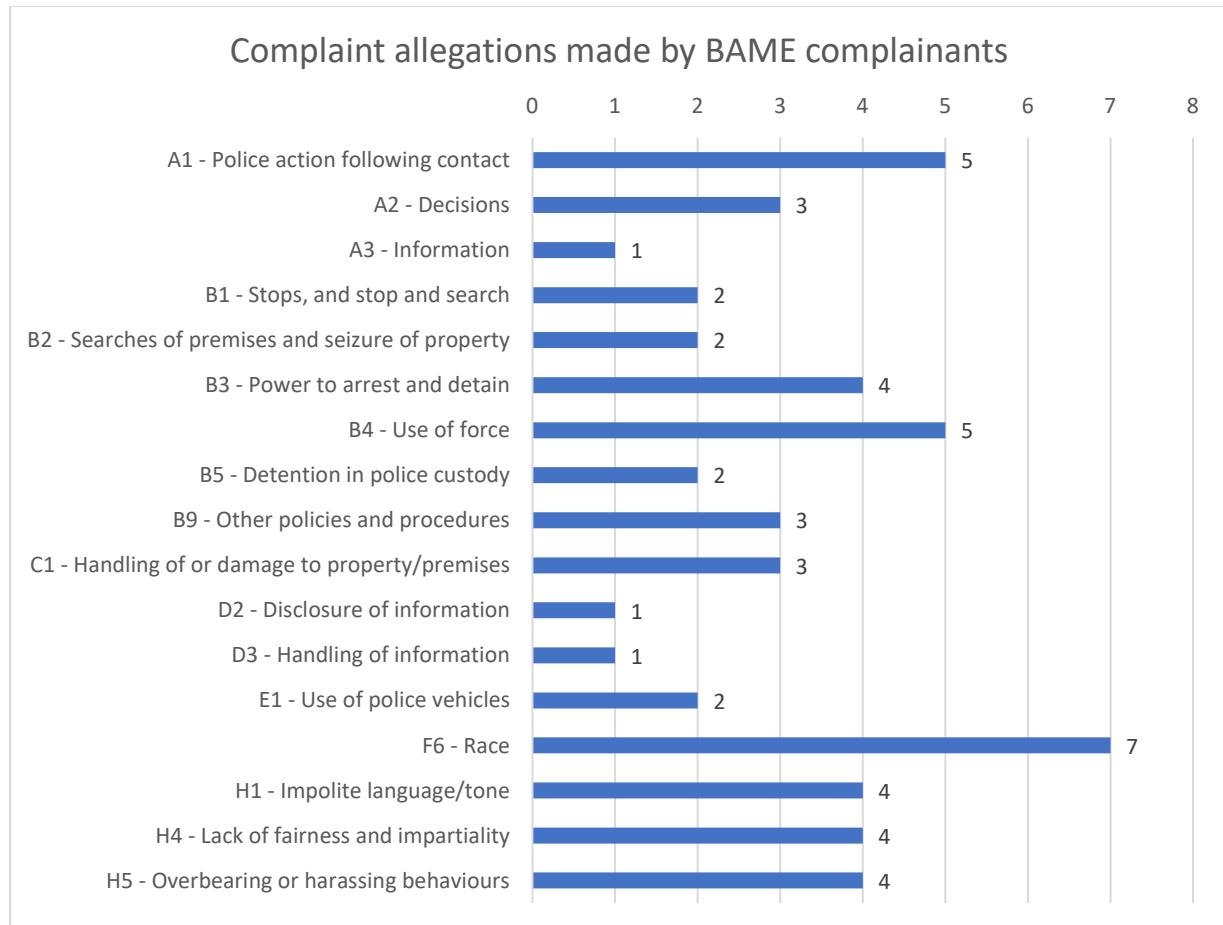
Of the 206 complainants recorded on the cases, 22 have advised PSD they are Black, Asian and Minority Ethnic (BAME). This is 10.7% of all the complainants recorded.

This compares to 22 complainants from BAME backgrounds in the same period last year, which was 9.5% of the 232 complainants recorded and 5 complainants in Q1-Q2 2019/20 which was 3.3% of the 152 complainants.

The percentage of complainants from BAME backgrounds has increased and the percentage of complainants providing their ethnicity data has also increased.

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(Chart 14): The 22 complainants from BAME backgrounds have made 53 separate complaint allegations in the reporting period and these are broken down into the following sub-categories:



Examples of the allegations recorded between 1 April and 30 September 2021 under the top 7 sub-categories are detailed as follows:

- **Race** – the complainant states the traffic stop was motivated by racial bias
- **Police action following contact** – following a complaint about neighbours the complainant is dissatisfied that police have not dealt with their concerns
- **Use of force** – police used force to smash a car window which the complainant believes was unnecessary and exposed a child to risk from broken glass
- **Power to arrest and detain** – the complainant believes their arrest to be unlawful
- **Impolite language/tone** – the complainant states the officer was rude and aggressive
- **Lack of fairness and impartiality** – the complainant is a victim of crime and believes that preferential treatment has been given to the other party
- **Overbearing or harassing behaviours** – the complainant feels harassed and intimidated by officers due to the number of times they have attended their address

Discrimination complaints

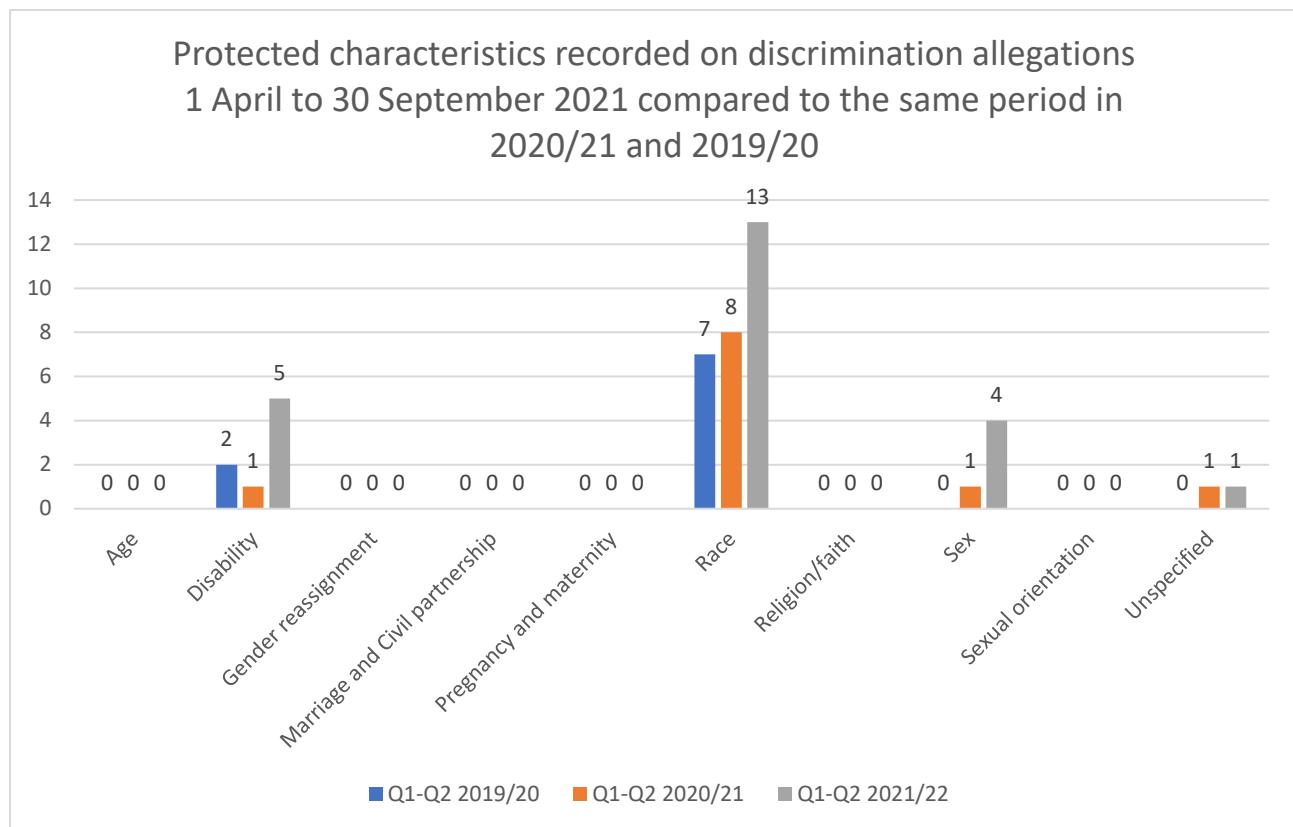
In the reporting period 1 April to 30 September 2021, the Professional Standards Department recorded 574 complaint allegations under new Regulations. Of this total, 23 allegations were recorded alleging discrimination which is 4% of the total.

To compare this to the same period last year, 11 allegations of discrimination were recorded which is 2.5% of the total 436 allegations linked to complaints recorded.

In Q1-Q2 2019/20, 9 allegations of discrimination were recorded which is 3% of the 301 allegations recorded.

This category of complaint covers all discrimination under the protected characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation and other (identifiable groups not protected under the Equality Act 2010).

(Chart 15): The chart below shows the protected characteristics recorded on allegations received in the reporting period, compared to April to September in 2020/21 and 2019/20:



The current status of the 22 allegations recorded, is as follows:

- 4 resulted as the service provided was acceptable
- 2 resulted as the service provided was not acceptable
- 1 withdrawn by the complainant
- 1 has been finalised as resolved
- 11 live investigations
- 1 investigation has been suspended as it is currently sub judice
- 2 are subject to IOPC reviews

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Of the 22 allegations recorded, 13 were made under the protected characteristic of race. Complainant's feel the service they received was not acceptable, or they were treated less-favourably, due to their ethnicity.

Of the complaints recorded:

- 46% relate to an investigation, believing they have been treated differently or less-favourably during the investigating or that the arrest was made due to their ethnicity.
- 38% relate to the pro-active use of police powers, i.e. traffic stops or stop and search where the complainant believes that the stop was motivated by race.
- The remaining complaints relate to interaction with police when responding to an incident and comments made by an officer when having a conversation with the complainant.

Allegations of discrimination recorded 1 April to 30 September 2021

1. The complainant believes officers treated them differently due to their ethnicity – **RACE** (Schedule 3 complaint – the service provided was acceptable)
2. The complainant was stop searched and they believe this was racial profiling – **RACE** (Schedule 3 complaint – the service provided was acceptable)
3. When dealing with the incident police have failed to make reasonable adjustments – **DISABILITY** (Schedule 3 complaint – the service provided was acceptable)
4. The complainant was arrested and believes they were discriminated against due to their sex – **SEX** (Schedule 3 complaint – it was determined the service provided was not acceptable as the complaint handler identified that the complainant had made a counter allegation which was not recorded as a crime and investigated. The complaint handler considered this to be an oversight by the officers and has recorded the crime, apologised to the complainant and identified learning for the officers)
5. The complainant is a victim of domestic abuse and believes they have been discriminated against – **RACE** (Schedule 3 complaint – live investigation)
6. Officers stopped the complainant whilst driving and made a racist comment – **RACE** (Schedule 3 complaint – it was determined the service provided was not acceptable. The complaint handler obtained accounts from officers present and the body worn video showed that when the officer was providing a rationale around the stop they made a comment about the driver's nationality. The complainant was provided with an apology and learning was identified for the officer)
7. The complainant believes the traffic stop was motivated by racial bias – **RACE** (Schedule 3 complaint – subject of an IOPC review)
8. The complainant states the behaviour of the officer when speaking to them was inappropriate, derogatory and racist – **RACE** (Schedule 3 complaint – live investigation)
9. The complainant was mistakenly identified and arrested by officers and they believe this was racial profiling – **RACE** (Schedule 3 complaint – live investigation)

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10. The complainant believes they have received different treatment by officers due to their race – **RACE** (Schedule 3 complaint – live investigation)
11. During a police investigation the complainant states the other party was to receive words of advice however the complainant was arrested and believe they have been discriminated against – **SEX** (Schedule 3 complaint – the service provided was acceptable)
12. The complainant does not believe their mental health was considered and put them at a disadvantage – **DISABILITY** (Schedule 3 complaint – live investigation)
13. Officers attending an incident made comments to the complainant which they feel are racist – **RACE** (Schedule 3 complaint – live investigation)
14. The complainant's property was searched by officers and they were arrested which they believed to be discriminatory – **DISABILITY** (Schedule 3 complaint – withdrawn by the complainant)
15. The complainant believes police have pursued them with no evidence – **RACE** (Schedule 3 complaint – subject of IOPC review)
16. The complainant was issued with a ticket for excess speed and feels they were discriminated against by the officer due to their previous record – **OTHER** (Schedule 3 complaint – currently suspended due to being sub judice)
17. Officers attended an incident and the complainant is unhappy with the action taken – **DISABILITY** (Schedule 3 complaint – no further action taken)
18. The complainant is dissatisfied with the action of the officers when arrested and believes they were treated unfairly due to their gender – **SEX** (Outside Schedule 3 complaint – resolved)
19. Officers conducted a vehicle stop and the complainant believes they were racially profiled – **RACE** (Schedule 3 complaint – live investigation)
20. The complainant feels the way the officer dealt with the situation was demeaning – **SEX** (Schedule 3 complaint – live investigation)
21. The complainant feels that officers lack consideration for their disability – **DISABILITY** (Schedule 3 complaint – live investigation)
22. Officers attended the complainant's address and they believe they were treated less favourably due to their skin colour – **RACE** (Schedule 3 complaint – live investigation)
23. The complainant was stopped whilst driving and believe this was due to being black – **RACE** (Schedule 3 complaint – live investigation)

Police officers and staff subject of complaint

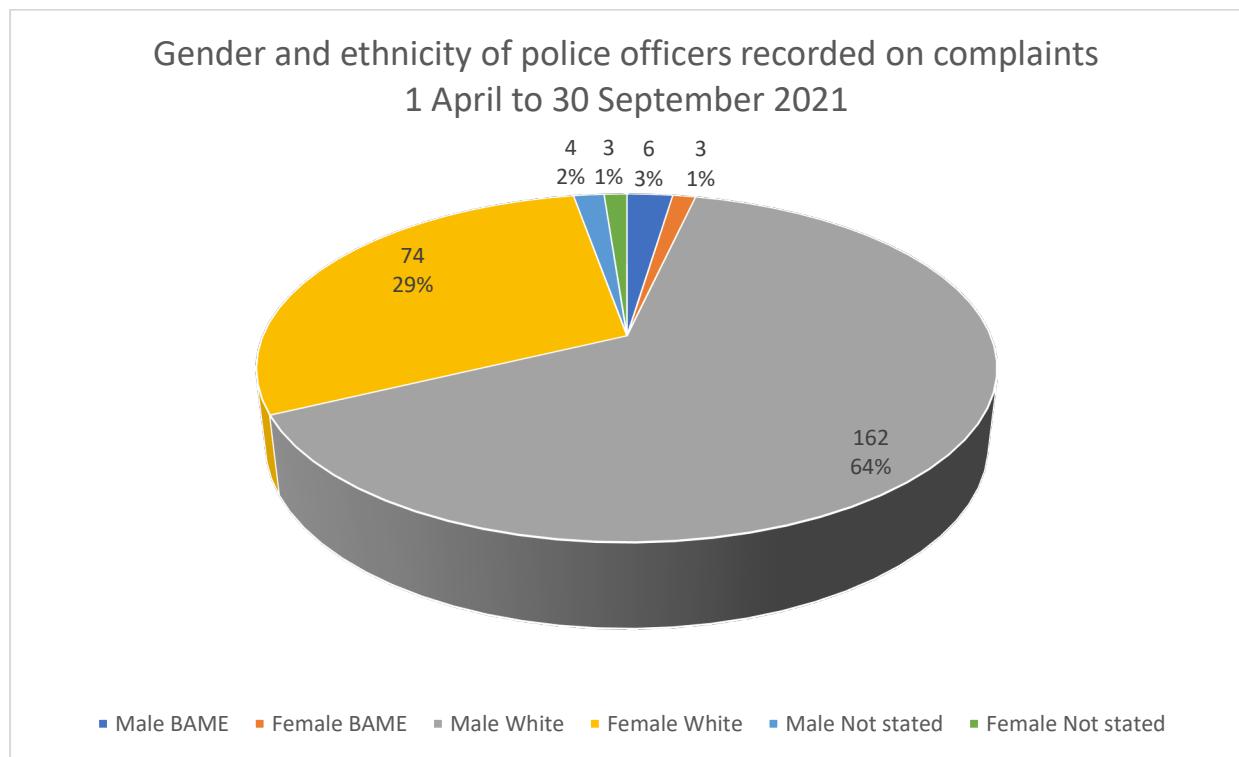
The 198 complaints received in the reporting period have been made against 384 police officers, Special Constables and members of police staff (subjects).

Not all officers and staff are identified at the point the complaint is made as the complainant may not know the details of the person they had contact with.

A total of 261 individual officers and staff² have been identified on the 198 complaints received in the reporting period however it is likely that this number will increase during the investigation / resolution of the complaint.

Police officers

(Chart 16): Of the identified subjects, 252 are police officers and Special Constables and details of their gender and ethnicity are detailed in the chart below:



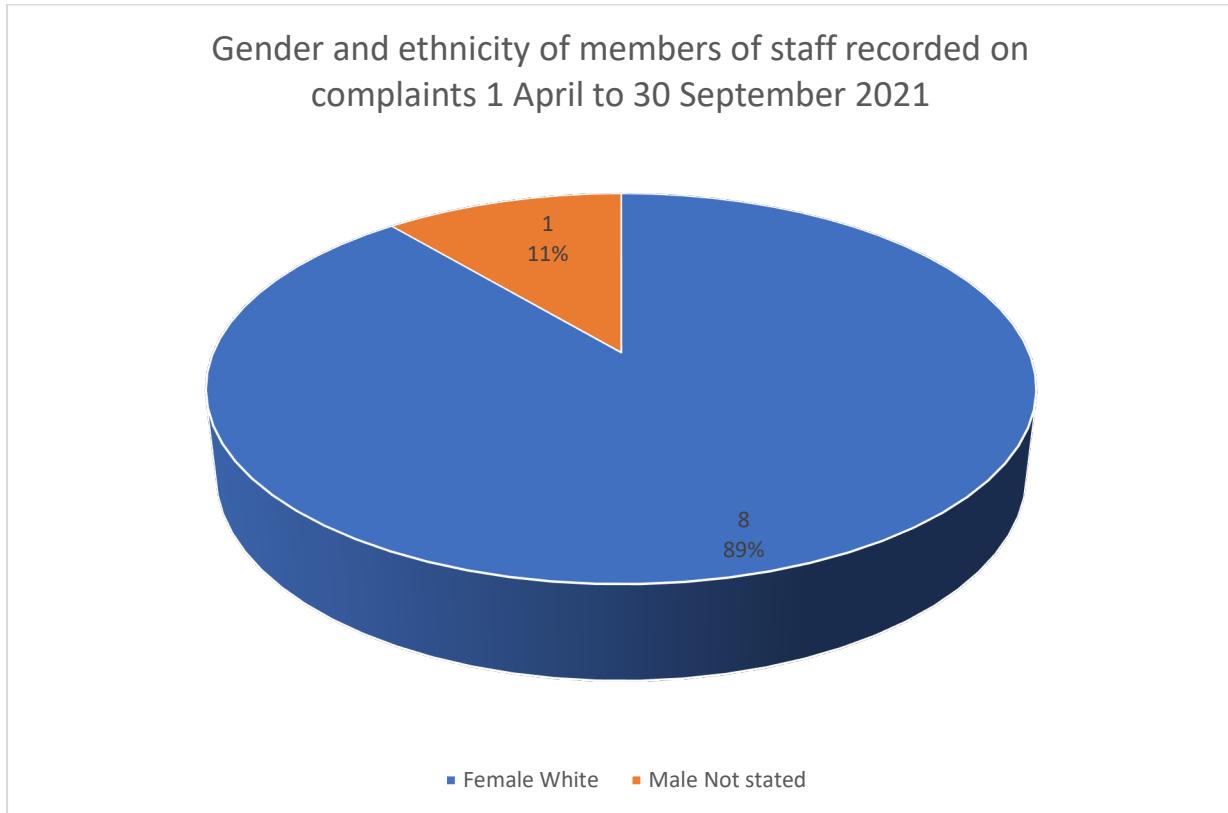
Of the 252 identified officers, 3.6% are BAME, 93.7% are White and 2.8% are unknown.

Suffolk workforce figures show that 2.7% of police officers are BAME, 95.9% are White and 1.4% have not stated their ethnicity.

² Officers and staff have been counted once regardless of how many complaints they may be linked to in the reporting period.

Members of police staff

(Chart 17): Of the identified subjects, 9 are members of police staff and details of their gender and ethnicity are detailed in the chart below:



Organisational learning

Organisational and individual learning is an important part of the complaints process. Opportunities to learn come from a variety of sources and when identified are referred to PSD.

The following examples highlight some of the organisational learning from the reporting period where follow up action has been completed in order to reduce the likelihood of the same problem reoccurring:

1. PSD have recorded complaints relating to poor levels of communication between the investigating officers and victims of crime. This has been addressed with individual officers by their line managers. In addition, further guidance has been produced and disseminated to all officers which highlights their responsibility under the victims code of practice (VCoP). This guidance has been published internally to all officers and members of staff.
2. Officers have been reminded of their obligations when interacting with the public, so that they do not intentionally or inadvertently abuse their position as Police officers. A special edition of Learning Times was published which focussed on abuse of position. A new video entitled 'Abuse of Position' has been produced and it is mandatory for all officers to view it. Officers are encouraged to report any behaviour from colleagues which fell below that expected, to the anti-corruption unit within PSD.
3. A common theme of individual learning is under use of Body Worn Video. Which has been addressed accordingly – poster guidance has been produced and circulated to all operational bases across Suffolk. PSD have worked closely with Learning and Development to improve the use of Body Worn Video by providing additional support to student officers during their training period; to help them create the muscle memory of using body worn video. As a result, body worn video is now allocated to student officers at the start of their training and is used to record footage when completing role play scenarios. Officers are also reminded during taser courses of the importance of using BWV when deploying this use of force.
4. In addition to the above matters a trend has been identified regarding the wearing of personal protective equipment owing to the COVID pandemic – these were, mostly dealt with on an individual basis. However, reminders were issued through the use of learning times/ 60 second briefing and posters within Police stations.
5. Officers attended the scene of an RTC and failed to place cones and signage appropriately, causing vehicles to swerve. This contributed to a further RTC at the same location. The officers involved were spoken to by their line managers and instructed to complete a 'Fast Roads' e learning package. As a result of this incident a training package is being completed with the intention that it is rolled out to all frontline officers.

The vast majority of individual learning is managed by line managers through advice which can be recorded as part of the PDR process and in some cases reflective practice. The use of reflective practice is currently under review in order to promote its use and expand the circumstances in which it is used. The intention is to foster a culture of learning through self-reflection.

In addition to the above matters a proportion of complaints relate to the way in which officers interact with the public when attending incidents. The common theme relating to these

complaints is incivility. In all circumstances of recorded learning the officers have been spoken to by their supervisors and asked to reflect not only on the words that are used but their nonverbal cues.

Complaint training

Prior to the introduction of the new reforms in February 2020, a number of presentations were delivered to supervisors and senior managers in both counties, to raise awareness. COVID-19 has meant that training has had to be tailored to meet any restrictions and where possible training has been delivered face to face, but in the main via Teams. Presentations have been delivered to new supervisors as part of their development, as well as mini masterclasses on complaint handling to individuals and small groups arranged by local managers.

The PSD Intranet pages and communications, including Learning Times provide up to date information on the reforms, guidance and best practice, as well as any changes to process. Staff in CMU are available to respond to queries and to offer support and guidance in the management of cases.

Work is ongoing with L&D to produce a bespoke learning package for complaint handling for new supervisors on the Best I Can Be portal. When this is finalised we will look to develop something similar for Inspectors who will be responsible for managing more complex investigations.

The Serious Cases Unit within Professional Standards has continued to support the training of Student Officers, Custody Sergeants and Special Constables, this has been further expanded to assist and support the development through presentations to Suffolk Sergeants and the Foundation Detective Course. Whilst the method of delivery had been digital (via Teams), and whilst face to face training is being resumed in part, a degree of flexibility on delivery method has been maintained to allow for the changing operational restrictions to ensure safer working whilst the pandemic still has an impact.

Reviews

Complaints recorded under Schedule 3 of the PRA 2002 from 1 February 2020, allow the complainant to request a review if they remain dissatisfied with the outcome of their complaint.

The request for review is made to either the IOPC or the Local Policing Body and the outcome letter to the complainant will advise them who the relevant review body is.

IOPC reviews

In the reporting period the IOPC received 10 requests to review the outcome of the complaint and of those, 2 have been concluded.

In both cases the IOPC determined that the outcome of the complaint was reasonable and proportionate.

Local Policing Body (PCC) Reviews

Where the relevant review body is the PCC, the Office of the PCC (OPCC) will review the complaint and consider whether the response provided by Suffolk Constabulary appears 'reasonable and proportionate' based on the evidence supplied. The review will also consider whether the outcome of the complaint was reasonable and proportionate and whether there is a need to make any recommendations to Suffolk Constabulary.

In the event that any recommendations are necessary, Suffolk Constabulary must provide a written response to both the complainant and the PCC.

A total of 17 reviews were recorded by the Local Policing Body (PCC) in the period of 01/04/21 – 30/11/21 and only one of these reviews remains outstanding.

The outcome of the 16 finalised reviews for period 01/04/21 – 30/11/21 are as follows:

- 12 not upheld;
- 2 upheld – In 1 case no formal recommendations were made because the missing explanation was provided. In 1 case a formal recommendation was made for the complaint to be reinvestigated. This recommendation was accepted by the PSD and actioned as appropriate.
- 1 review request was withdrawn.
- 1 review remitted to IOPC as Relevant Review Body

12 Month Letters (Chapter 13)

As part of the oversight requirements on Local Policing Bodies under chapter 13 of The Police (Complaints and Misconduct) Regulations 2020, the Chief Constable is required to notify of any police complaints which take longer than 12 months to resolve and explain the reasons.

A total of four 12-month letter was received by the Local Policing Body (PCC) in the reporting period of 01/04/21 – 30/11/21. We are content with the explanation received and will continue to monitor this area moving forward.

Chapter 13 Reviews

Where a local investigation is not completed within 12 months the appropriate authority must provide the local policing body and the IOPC with details, in writing, of the cases including the progress of the investigation, an estimate of the timescales, the reason for the length of time taken and a summary of the steps to progress the investigation and bring it to a conclusion.

In the reporting period, 1 April 2021 to 31 September 2021, 1 complaint case was highlighted as not being completed within 12 months. The investigation had been suspended for a period of time due to the complaint being sub judice. There were also 2 conduct cases which met the criteria.

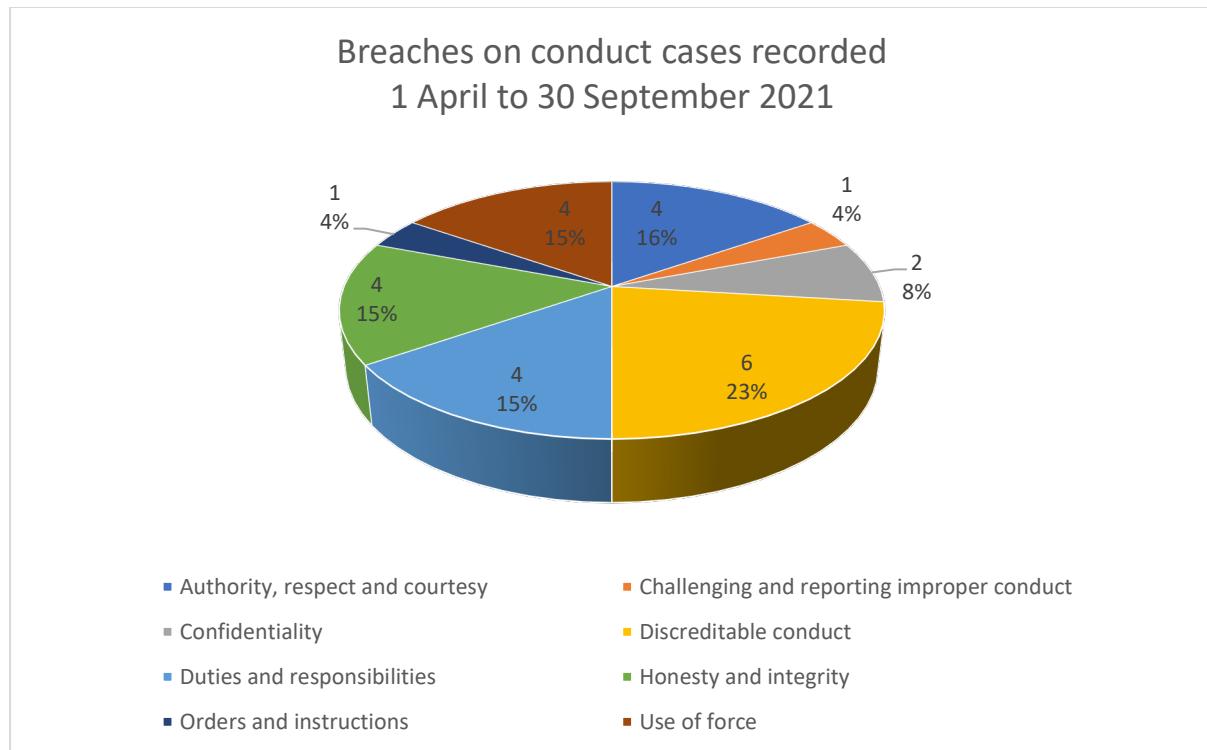
The IOPC confirm there is no requirement to review cases which are sub judice and provide a formal response. However it has been agreed that the appropriate authority will advise the local policing body of all cases which meet the 12-month time period and also highlight any IOPC independent investigations which take longer than 12 months to complete. During the reporting period, 1 April 2021 to 31 September 2021 there were 3 cases which met this criteria, none of which were IOPC independent investigations.

Internal Investigations

In the reporting period, 1 April to 30 September 2021, 15 internal conduct cases were recorded.

A total of 26 separate breaches of the Standards of Professional Behaviour have been recorded on the 15 conduct cases. These breaches relate to 15 Police officers, 2 members of Police staff and 1 member of the Special Constabulary.

(Chart 18): The chart below displays a breakdown of the breaches recorded on the conduct cases under each category and as a percentage overall:



The most frequently recorded breach in the reporting period was 'Discreditable conduct' which is 23.1% of the total recorded. This was followed by 'Authority, respect and courtesy', 'Duties and responsibilities', 'Honesty and integrity' and 'Use of force' all at 15.4% of the total.

Examples of some of the breaches recorded are as follows:

- Allegation the officer was abusive to members of staff in a fast food restaurant, whilst off duty
 - *Live investigation*
- Allegation officers used inappropriate language towards a member of the public during their arrest
 - *Live investigation*
- Allegation the member of staff has failed to follow Force policy and practices in their role
 - *Live investigation*
- Allegation the police officer was not honest in their account given to a colleague

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- *Live investigation*
- Allegation the police officer used excessive force during an arrest causing injuries
 - *Live investigation*

Of the conduct cases recorded in the reporting period, 5 have been finalised to date:

- 1 case resulted in the matter being determined as Practice Requiring Improvement and was referred for Reflective Practice
- 1 case resulted in informal management action
- 1 case resulted in the officer resigning and no further action was taken
- 2 cases resulted in no case to answer for misconduct and no action was taken

Misconduct outcomes

(Table 6): The following table provides details of the misconduct outcomes recorded against police officers, police staff and members of the Special Constabulary as a result of hearings and meetings.

MISCONDUCT HEARINGS 1 APRIL TO 30 SEPTEMBER 2021			
1	A misconduct hearing was held for a former police officer for Authority, respect and courtesy and Discreditable conduct Inappropriate behaviour towards a female colleague		Amounted to misconduct rather than gross misconduct and as the officer is no longer serving no further action will follow
MISCONDUCT MEETINGS			
1	A police officer attended a misconduct meeting for Duties and responsibilities Failed to provide prompt and accurate information to colleague		Written Warning

Resignations

The Policing and Crime Act (PCA) 2017 contains a number of reforms and from 15 December 2017 allows officers under investigation to resign or retire however there is an expectation that misconduct proceedings for gross misconduct will be taken to conclusion.

The Police Barred List is a list of all officers, special constables and staff members who have been dismissed from policing after investigations under the Police (Conduct) Regulations 2012 or Police (Performance) Regulations 2012 as well as the equivalents for police staff.

The Police Advisory List is a list of all officers, special constables and staff members who have resigned or retired during an investigation into a matter that could have resulted in their dismissal, or who leave before such an allegation comes to light. They will remain on the Advisory list until the outcome of the investigation is determined. This list also includes designated volunteers who have had their designated status withdrawn due to conduct or performance matters.

Both lists are held and administered by the College of Policing.

In the reporting period two police officers resigned whilst under investigation. One resulted in a misconduct hearing for the former officer and in the other case, no further action was taken.

Public Hearings

Since 1 May 2015, in cases where an officer is given notice of referral to misconduct proceedings under regulation 21 (1) or 43 (1) of the conduct regulations, the case will be heard in public. This is also the case for special case hearings (fast track cases). Exemptions from this are subject to the discretion of the person chairing or conducting the hearing to exclude any person from all or part of the hearing.

The regulations do not apply to misconduct meetings or third stage unsatisfactory performance meetings.

Venues for public hearings will be carefully selected according to the nature of the hearing.

In cases where an officer is given notice of referral to misconduct proceedings under regulation 21 on or after 1 January 2016 the hearing is heard by legally qualified chairs. Any cases prior to this date will continue to be heard by a member of the National Police Chief's Council (NPCC).

One misconduct hearing was held in public within the reporting period for a former officer.

Dip Sample by the Office of the Police and Crime Commissioner

Dip sampling of complaint files is a key component of the oversight arrangements which are implemented by the Police and Crime Commissioners in pursuit of the statutory duties set out in the Police Reform and Social Responsibility Act 2011, and further strengthened in the Policing and Crime Act 2017.

Since the last report was presented to the Accountability and Performance Panel, the OPCC has completed Dip Sampling from the finalised cases provided by the Constabulary's Professional Standards Department (PSD) for the periods of 1 January 2021 to 31 March 2021 and 1 April 2021 to 30 June 2021.

A total of 17 files were subject to Dip Sampling which included complaints that were handled under the new complaint system introduced as part of the Policing and Crime Act 2017 that came into effect on 1 February 2020.

The finalised complaints included files where investigations were conducted by both Suffolk Constabulary and PSD (and included complaints both upheld and not upheld). Consideration was also given to files where it was decided to record and take no further action (under the new regulations) as well as complaints that were withdrawn. To ensure consideration of the full complaints process, the sample also included two cases which were subject to an appeal (under the old regulations).

Overall, the files sampled were completed to the expected standard with few issues highlighted with the process followed. There were a number of positive examples of detailed final reports being provided to the complainant which were well written and covering all the issues raised. There were also examples where additional operational learning had been identified on elements that did not form the main focus of the complaint received.

The most common issue highlighted within the Dip Sample was officers not being kept updated upon the conclusion of the complaint process. There were also examples of delays in progressing complaints by the investigating officers after a complaint had been allocated to them. This process was managed well within the PSD however this did result in some delays in finalising complaints which could have increased the frustration of the complainant.

Other issues highlighted included:

- Complaint outcomes being recorded incorrectly due to a Centurion error.
- Example where all the outcomes of an IOPC investigation were not recorded correctly.
- Delay in the complaint assessment process.

Overall, it must be stated that this was a positive Dip Sample with clear examples of detailed investigations taking place which covered a number of sensitive subjects. There were several examples of positive and proactive engagement with complainants as well as apologies being offered in line with the new complaint procedures. Improvements were also evident between the two quarters sampled which is a positive example of the new procedures being implemented by the PSD having a positive impact on the complaints process.

Glossary

Appropriate authority - the appropriate authority for a person serving with the police is:

- for a chief officer or an acting chief officer, the local policing body for the area of the police force of which that officer is a member; or
- in any other case, the chief officer with direction and control over the person serving with the police

In relation to complaints not concerning the conduct of a person serving with police, the appropriate authority is the chief officer of the police force with which dissatisfaction is expressed by the complainant.

Complaint – any expression of dissatisfaction with police expressed by or on behalf of a member of the public

Complaint handler – is any person who has been appointment to handle a complaint

IOPC Statutory Guidance – is the guidance from the IOPC to assist local policing bodies and Forces to achieve high standards in the handling of complaints, conduct matters, and death or serious injury (DSI) matters concerning those serving with the police, and to comply with their legal obligations.

Schedule 3 – of the Police Reform Act 2002

Outside Schedule 3 – handling a matter outside of the Police Reform Act 2002

Investigation – an investigation of the matter recorded under Schedule 3.

Otherwise than by investigation – responding to concerns raised and seeking to resolve them under Schedule 3.

Service provided was not acceptable – the service provided (whether due to the actions of an individual, or organisational failings) did not reach the standard a reasonable person could expect.

Not been able to determine if the service provided was acceptable – should only be determined in situations where despite the complaint being handled in a reasonable and proportionate manner, there is too little information available on which to make the determination.

Local Policing Body – is the term for the Police and Crime Commissioners

Practice requiring improvement – underperformance or conduct not amounting to misconduct or gross misconduct, which falls short of the expectations of the public and the police service.

Regulation 41 – the Regulation under the Police (Complaints and Misconduct) Regulations 2020 under which the appropriate authority contacts the complainant following a suspension of the investigation of a complaint to ascertain whether they wish for the investigation to be started or resumed. If the complainant does not want the investigation started or fails to reply the appropriate authority must determine whether it is in the public interest for the complaint to be treated as a recordable conduct matter.

Reflective Practice Review Process – the procedures set out in Part 6 of the Police (Conduct) Regulations 2020, for handling practice requiring improvement

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Relevant review body (RRB) – the relevant body (the IOPC or the Local Policing Body) to consider a review made under Paragraph 6A or 25, Schedule 3, Police Reform Act 2002.

Withdrawn complaints – a complaint that is withdrawn in accordance with regulations 38 and 39, Police (Complaints and Misconduct) Regulations 2020 following an indication or notification from the complainant.

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IOPC Complaint Categories:

Reference	Category / sub-categories
A	<p>Delivery of duties and service</p> <p>A1 Police action following contact A2 Decisions A3 Information A4 General level of service</p>
B	<p>Police powers, policies and procedures</p> <p>B1 Stops, and stop and search B2 Searches of premises and seizure of property B3 Power to arrest and detain B4 Use of force B5 Detention in police custody B6 Bail, identification and interview procedures B7 Evidential procedures B8 Out of court disposals B9 Other policies and procedures</p>
C	<p>Handling of or damage to property/premises</p>
D	<p>Access and/or disclosure of information</p> <p>D1 Use of police systems D2 Disclosure of information D3 Handling of information D4 Accessing and handling of information from other sources</p>
E	<p>Use of police vehicles</p>
F	<p>Discriminatory behaviour</p> <p>F1 Age F2 Disability F3 Gender reassignment F4 Pregnancy and maternity F5 Marriage and civil partnership F6 Race F7 Religion or belief F8 Sex F9 Sexual orientation F10 Other</p>

Reference	Category / sub-categories
G	Abuse of position/ corruption G1 Organisational corruption G2 Abuse of position for sexual purpose G3 Abuse of position for the purpose of pursuing an inappropriate emotional relationship G4 Abuse of position for financial purpose G5 Obstruction of justice G6 Abuse of position for other purpose
H	Individual behaviours H1 Impolite language/tone H2 Impolite and intolerant actions H3 Unprofessional attitude and disrespect H4 Lack of fairness and impartiality H5 Overbearing or harassing behaviours
J	Sexual conduct J1 Sexual assault J2 Sexual harassment J3 Other sexual conduct
K	Discreditable conduct
L	Other

The above categories are explained in greater detail in this document (Appendix A):

[Guidance on capturing data about police complaints Jan2021.pdf](https://policeconduct.gov.uk/Guidance_on_capturing_data_about_police_complaints_Jan2021.pdf)
policeconduct.gov.uk