



**SUFFOLK
CONSTABULARY**

Professional Standards

Complaints Statistics

1 April to 30 September 2017

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Executive Summary

This report presents figures on public complaints relating to Suffolk Constabulary recorded during the period 1 April to 30 September 2017. These complaints are made by members of the public in relation to the conduct of those serving with the Police and are dealt with under the Police Reform Act 2002 (PRA 2002). The PRA 2002 introduced a number of changes with regard to complaints against the Police. These changes came into effect on 1 April 2010 and aimed to improve the way that complaints are handled. Under the PRA 2002, forces are required to record all complaints made by the public in relation to the conduct of those serving in the force. Amendments made to the police complaints system by the Government in the Police Reform and Social Responsibility Act 2011, introduced in November 2012, were designed to streamline and remove unnecessary bureaucracy from the system, ensure that complaints are handled at the lowest appropriate level, and focus more on putting right the complaint made by the member of the public. As a result of the amendments Direction and Control issues are now recorded as Public Complaints and the allegations referred to as Organisational.

Data for the report is extracted from the Professional Standards database on a quarterly basis. The data is sourced from a live case management system and as such is a snap shot of the information as it was at the time therefore it should be noted that there may be variances between the quarterly figures and the accumulative data.

Key Findings

- Public complaint numbers have increased by 26%, from 152 complaints recorded in Q1-Q2 2016/17 to 191 in 2017/18. Allegations recorded have also increased, by 1% from 336 allegations in Q1-Q2 2016/17 to 340 in 2017/18.

This is a significant increase in complaint numbers when comparing quarterly data and the figure of 191 complaints is the highest recorded when reviewing Q1-Q2 data over the last 10 years.

This is not however, the largest percentage increase over that period of time. In 2013/14, complaint numbers rose by 50% in comparison to the same period in 2012/13.

The main areas of public complaint remain the same as in previous quarters with 'Other neglect or failure in duty' recording the largest percentage of all allegations.

- a) 'Other neglect or failure in duty' represents 47% of all recorded allegations. In the reporting period, 161 allegations were recorded in comparison to 32%, 106 allegations in 2016/17.
- b) 'Incivility, impoliteness and intolerance' represents 11% of all recorded allegations. A total of 37 allegations were recorded under this category in 2017/18, in comparison to 8%, 26 allegations the previous year.
- c) 'Other assault' represents 8% of all recorded allegations. A total of 26 allegations were recorded under this category in 2017/18, in comparison to 13%, 44 allegations the previous year.
- d) Organisational allegations represent 0.29% of all recorded allegations. In the reporting period 1 allegation was recorded, in comparison to 2%, 6 allegations in the same period the previous year.

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In Q1-Q2 2016/17, a total of 35 allegations were recorded under 'Oppressive conduct or harassment' and this represented 10% of the total allegations recorded however in 2017/18 this dropped to just 3%, 10 allegations.

Similarly there has been a decrease in allegations recorded under the Home Office category of 'Lack of fairness and impartiality'. In the reporting period 13 allegations were recorded which is 4% of the total. This compares to 31 allegations, 9% in 2015/16.

The allegations of Breach Code C PACE have halved, to 15 allegations, 4% of the total recorded from 28 allegations, 8% recorded in Q1-Q2, 2016/17.

Complaint outcomes

When a public complaint is upheld, there are a number of options available for dealing with the issue depending on the level of misconduct.

Management action

The purpose of management action is to:

- Deal with misconduct in a timely, proportionate and effective way that will command the confidence of staff, police officers, the police service and the public.
- Identify any underlying causes or welfare considerations.
- Improve conduct and to prevent a similar situation arising in future.

Management action may include:

- Pointing out how the behaviour fell short of the expectations set out in the Standards of Professional Behaviour
- Identifying expectations for future conduct
- Establishing an improvement plan
- Addressing any underlying causes of misconduct

Management action can be given to both police officers and police staff and is usually delivered in the form of words of advice.

If it is determined that the level of misconduct justifies a misconduct meeting, the chair can direct the outcome as management advice, up to and including a Final Written Warning. A misconduct hearing can result in dismissal.

COMPLAINT CASES AND ALLEGATIONS**Table A: Key Indicators Relating to Handling of Complaints**

<u>Measure</u>	<u>01.04.17 to 30.09.17</u>	<u>Same period 12 months previously</u>
% of cases recorded within 10 working days	86%	91%
Average number of days to Locally Resolve complaint*	58	43
Average number of days to Investigate complaint*	68	67

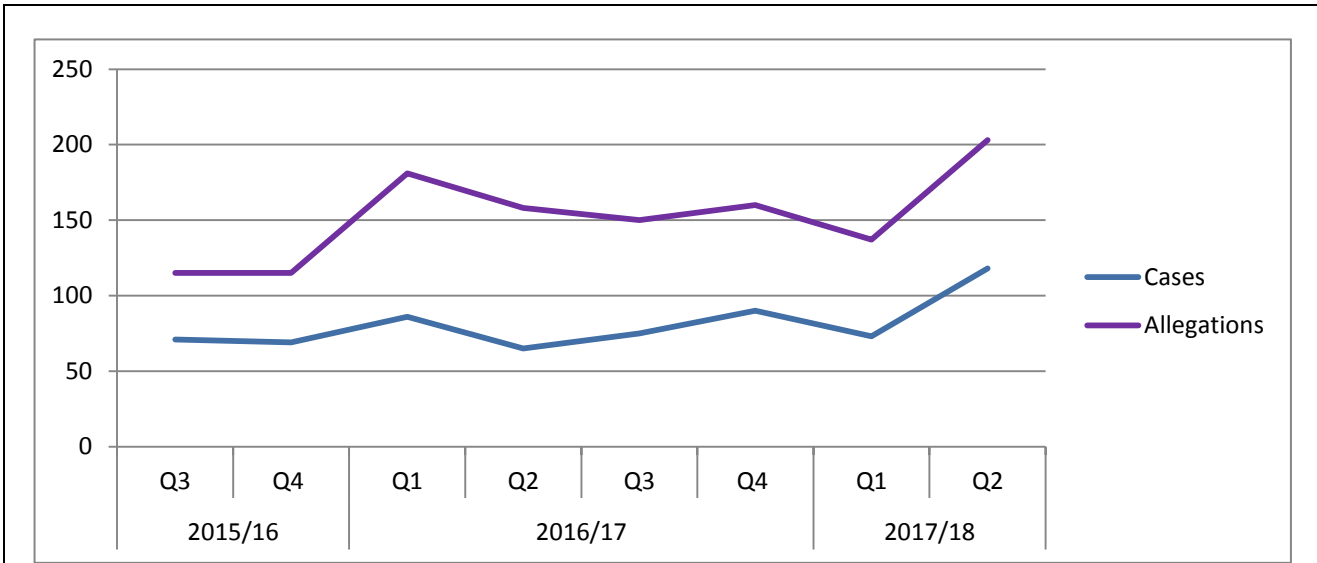
**The data relates to complaint cases, not allegations. The IPCC bulletin provides information regarding the average number of days to resolve/investigate allegations.*

Table B: Contextual Information Relating to Allegations and Outcome

<u>Measure</u>	<u>01.04.17 to 30.09.17</u>	<u>Same period 12 months previously</u>
<u>Recorded allegations</u>		
% of 'other neglect or failure in duty'	47	32
% of 'incivility, impoliteness and intolerance'	11	8
% of 'other assault'	8	13
% of 'lack of fairness and impartiality'	4	9
% of 'Breach of Code C PACE'	4	8
% of 'oppressive conduct or harassment'	3	10
<u>Outcome of Allegations</u>		
% discontinued/disapplication	14	3
% withdrawn	9	3
% upheld investigations	9	12
% locally resolved	39	51
% special requirements*	2	1

*The IPCC Statutory Guidance indicates that where a complaint is subject to special requirements (the officer may have committed a criminal offence, or behaved in a manner which would justify the bringing of disciplinary procedures) the investigator should indicate their opinion as to whether there is a case to answer in respect of misconduct or gross misconduct or whether there is no case to answer rather than stating the complaint is upheld or not upheld. Following a court judgment the way in which outcomes are recorded on the database was amended to accurately reflect those cases subject to special requirements.

Public Complaint Cases and Allegations



(Chart 1): The above chart shows the number of public complaint cases and allegations recorded during the reporting period.

Table C: Complaint cases and allegations recorded

<u>Period</u>	<u>Complaint Cases Recorded</u>	<u>Allegations Recorded</u>
Q3	71	115
Q4	69	115
2016/17 Q1	86	181
Q2	65	158
Q3	75	150
Q4	90	160
2017/18 Q1	73	137
Q2	118	203

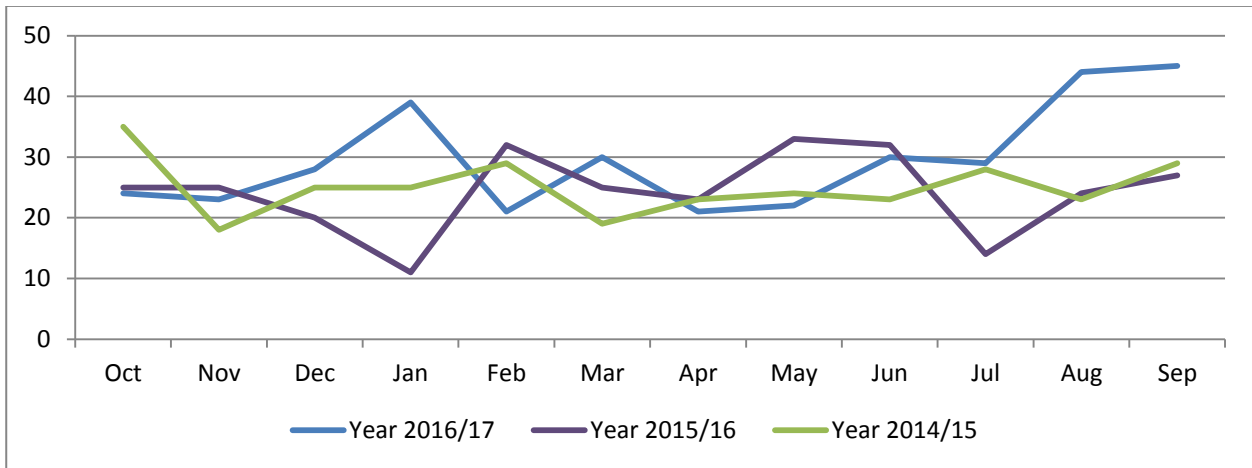
Note: Allegations recorded during specified periods may also include allegations added to existing cases. i.e. 137 allegations have been recorded during Q1. Of those, a proportion may be new allegations added to cases already recorded in Q4.

The accumulative quarterly complaint figures above do not take into account any cases which may have been initially recorded against Suffolk Constabulary and then changed to Norfolk Constabulary, or vice versa, following identification of the subjects. Equally, accumulative quarterly allegation figures do not take into account those allegations which are removed, amended or added to complaint cases during investigation and finalisation of the allegations, outside of the reporting quarter.

Public Complaints recorded – three year comparison

Table D: The below table and graph details the public complaints recorded monthly over the last three years

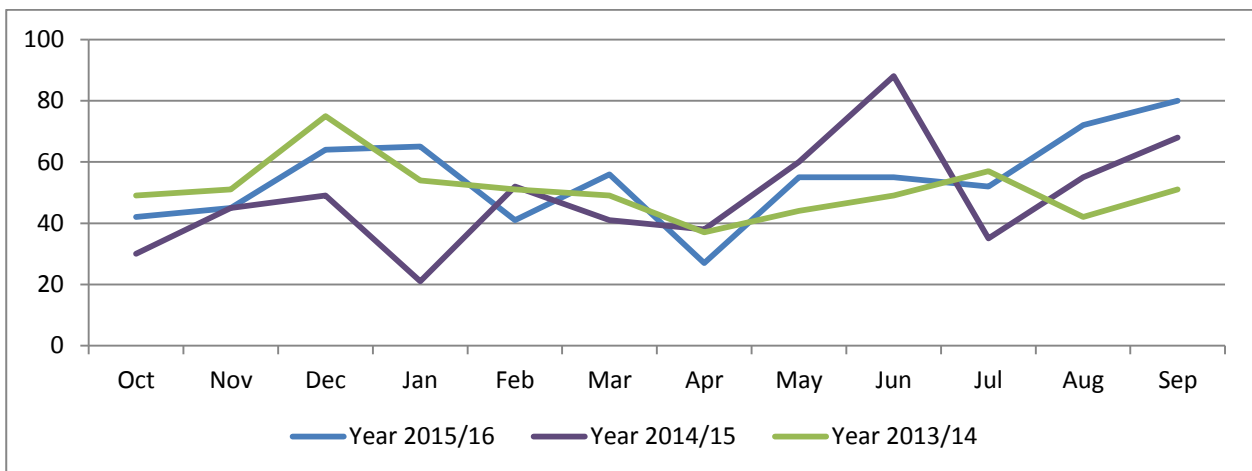
Month	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
Year 2016/17	24	23	28	39	21	30	21	22	30	29	44	45
Year 2015/16	25	25	20	11	32	25	23	33	32	14	24	27
Year 2014/15	35	18	25	25	29	19	23	24	23	28	23	29



Allegations recorded – three year comparison

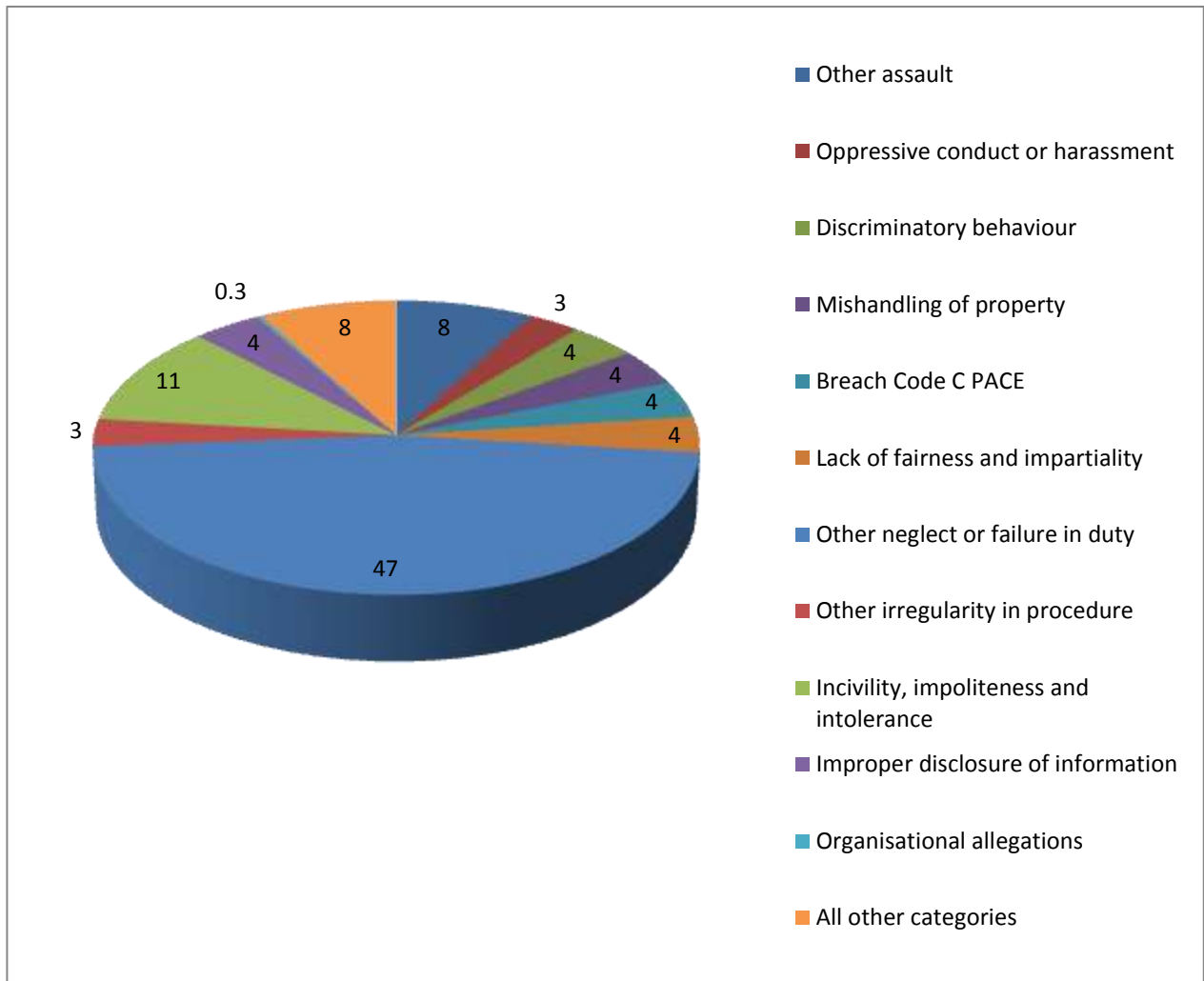
Table E: The below table and graph details the allegations recorded monthly over the last three years

Month	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
Year 2016/17	42	45	64	65	41	56	27	55	55	52	72	80
Year 2015/16	30	45	49	21	52	41	38	60	88	35	55	68
Year 2014/15	49	51	75	54	51	49	37	44	49	57	42	51



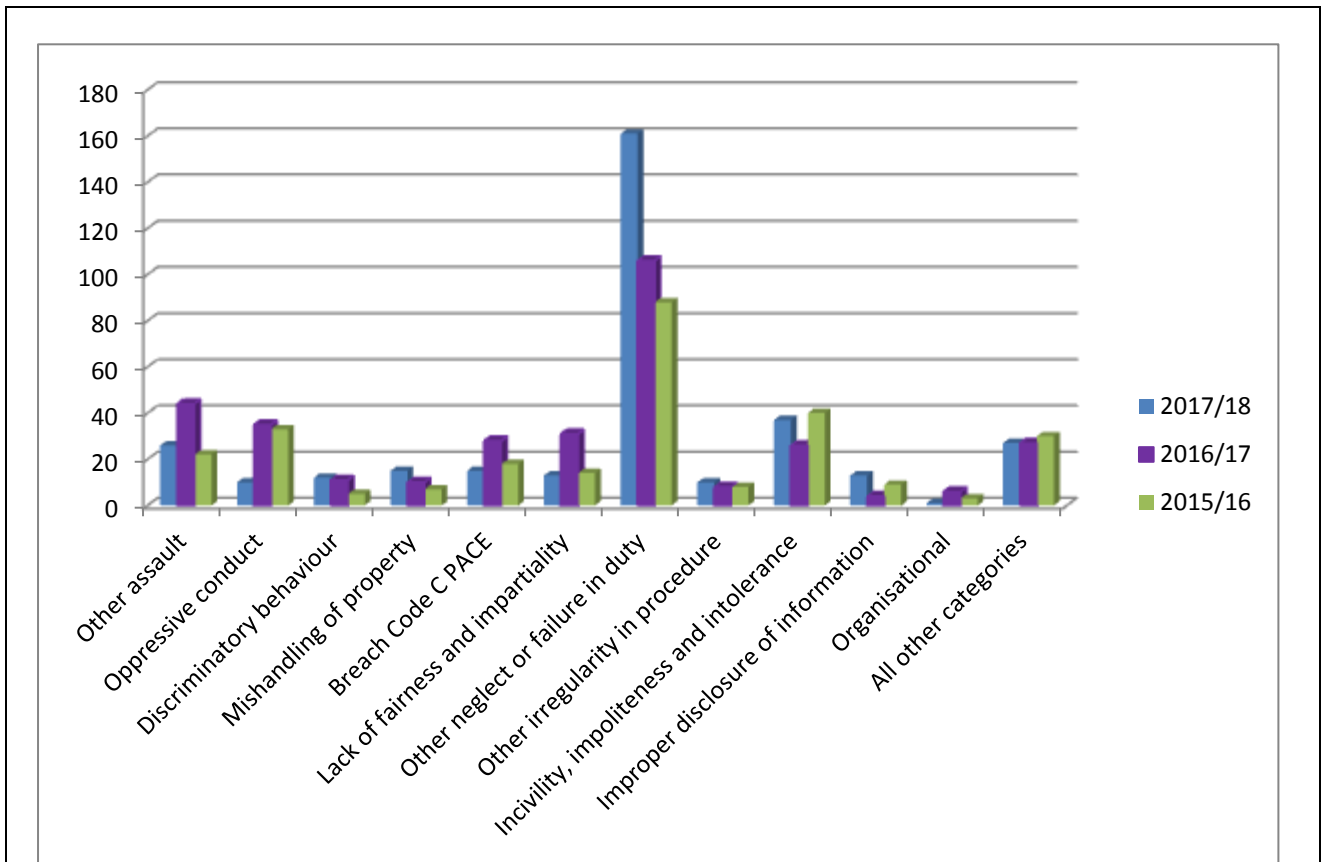
Allegations

Allegation categories recorded (percentage) between 1 April to September 2017



(Chart 2): The above chart shows the most frequently recorded allegations by type as a percentage of all allegations recorded. The categories which record the largest percentage (3% of the allegations and above) are displayed individually, with all others being grouped together.

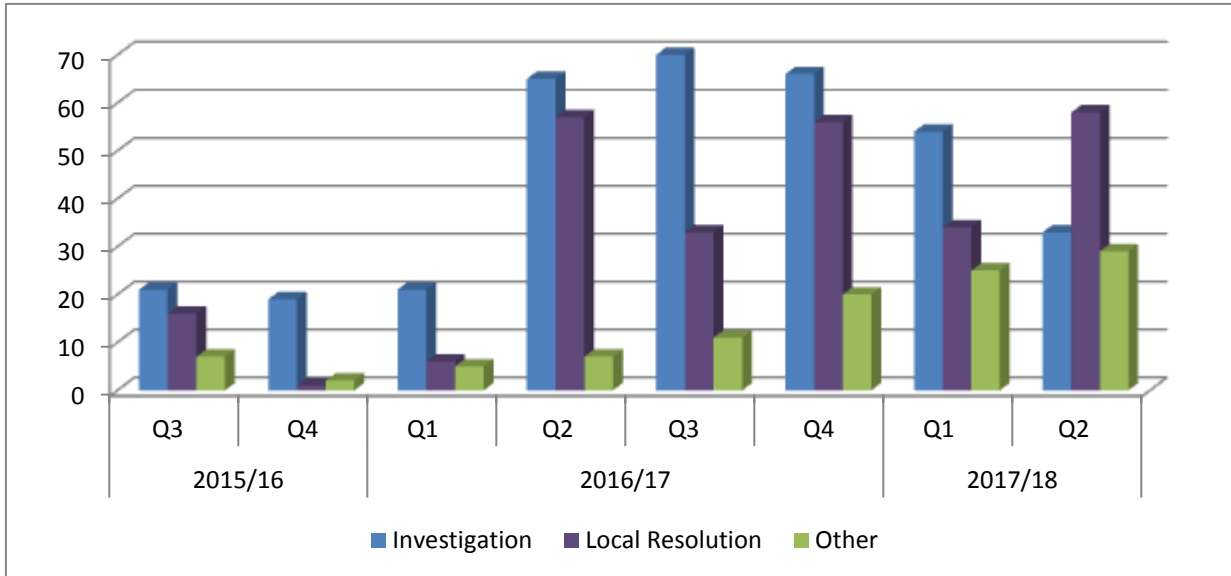
Allegations Recorded – Three year allegation comparison



(Chart 3): The above chart details the number of allegations recorded under each category. The categories which have the largest number of allegations recorded under them are represented, with all other categories being grouped together.

Allegations finalised by means

Number of allegations finalised by means



(Chart 4): Shows the means by which allegations have been finalised. The means by which an allegation can be finalised are 'Investigation' (local, supervised, managed and independent), 'Local Resolution' and 'Other' (discontinuance, disapplication and withdrawal).

<u>Period</u>	<u>Investigation</u>	<u>Local Resolution</u>	<u>Other</u>
2015/16 Q3	21	16	7
2015/16 Q4	19	1	2
2016/17 Q1	21	6	5
2016/17 Q2	65	57	7
2016/17 Q3	70	33	11
2016/17 Q4	66	56	20
2017/18 Q1	54	34	25
2017/18 Q2	33	58	29

Allegations resulted as 'Special Requirements' have been investigated and are therefore included in the investigations

Finalisation of Allegations**Table F: Outcome of allegations finalised by investigation (recorded against complaint cases post-April 2010)**

<u>Period</u>		<u>Upheld</u>	<u>Not Upheld</u>	<u>Special Requirements</u>
2015/16	Q3	2	19	-
	Q4	0	19	-
2016/17	Q1	1	20	-
	Q2	8	54	3
	Q3	11	59	-
	Q4	3	63	-
2017/18	Q1	5	45	4
	Q2	2	31	-

The above table details the outcome of investigated allegations that were recorded against public complaint cases. The complaint is upheld where there has been an unreasonable breakdown in service or failure in service which has adversely affected the complainant. This does not imply that there is a case to answer for misconduct/unsatisfactory performance by a police employee.

Table G: Allegations finalised by other means

<u>Period</u>		<u>Local Resolution</u>	<u>%</u>	<u>Withdrawn</u>	<u>%</u>	<u>Dispensed/ Discontinued/ Disapplication</u>	<u>%</u>
2015/16	Q3	16	36	2	5	5	11
	Q4	1	5	0	0	2	9
2016/17	Q1	6	19	2	6	3	9
	Q2	57	44	4	3	3	2
	Q3	33	29	8	7	3	3
	Q4	56	39	7	5	13	9
2017/15	Q1	34	30	11	10	14	12
	Q2	58	48	8	7	21	18

The percentage totals are against all allegations finalised during the reporting quarter.

Force Appeals

The appeal body for complaints changed with the introduction of the Police Reform and Social Responsibility Act 2011 on 22 November 2012. This places the responsibility on the individual Force for dealing with the majority of appeals. The IPCC will remain the appropriate authority for all formal investigations, those cases which were referred to the IPCC and cases where a non-recording decision was made. An assessment of the complaint is conducted on receipt to determine the relevant appeal body (RAB). An additional RAB test is completed in respect of each appeal received to ensure that correct appeal body has been identified.

Within the reporting period, 1 April to 30 September 2017, 15 appeals against all categories were received by the Force, with 13 of those being valid appeals.

Of the 13 valid appeals recorded within the reporting period, 9 have been finalised.

Table H: The table below details the categories under which the appeal was made and details the outcome and a percentage of valid appeals upheld:

	Live	Upheld	Not upheld	Not Valid	Total	% Upheld
Outcome of police investigation	1	0	2	0	3	0
Outcome of local resolution process	3	1	5	2	11	17%
Application of Disapplication	0	0	1	0	1	0
Application of Discontinuance	0	0	0	0	0	0
Total	4	1	8	2	15	11%

The percentage of valid appeals upheld across all categories is 11%

The average number of working days taken to finalise valid appeals within the reporting period is 34 days.

To compare the data to the same period in 2016/17, a total of 22 appeals were received and 18 had been reviewed at the time of the data collection.

The percentage of valid appeals upheld across all categories was 23.5% and it took on average 28 working days to finalise the appeals.

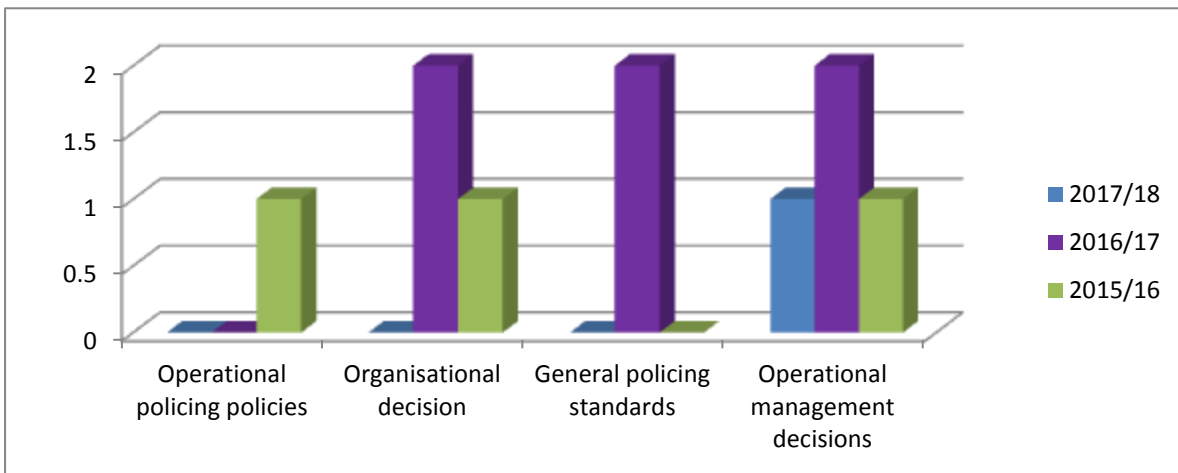
Direction and Control Complaints

On 22 November 2012, new legislation was introduced in the form of the Police Reform and Social Responsibility Act 2011 which changed the way that Direction and Control Complaints are recorded. All complaints of this nature are now recorded as Public Complaints, the allegations relate to Organisational issues and are categorised in the following way:

1. Operational policing policies
2. Organisational decisions
3. General policing standards
4. Operational management decisions

In the reporting period just one Direction and Control complaint was recorded.

Direction and Control complaints are low in previous quarters and the graph below details the Organisational allegation recorded in the reporting period, 1 April to 30 September 2017, in comparison to the same period the previous two years:



The organisational allegation recorded relates to Operational management decisions.

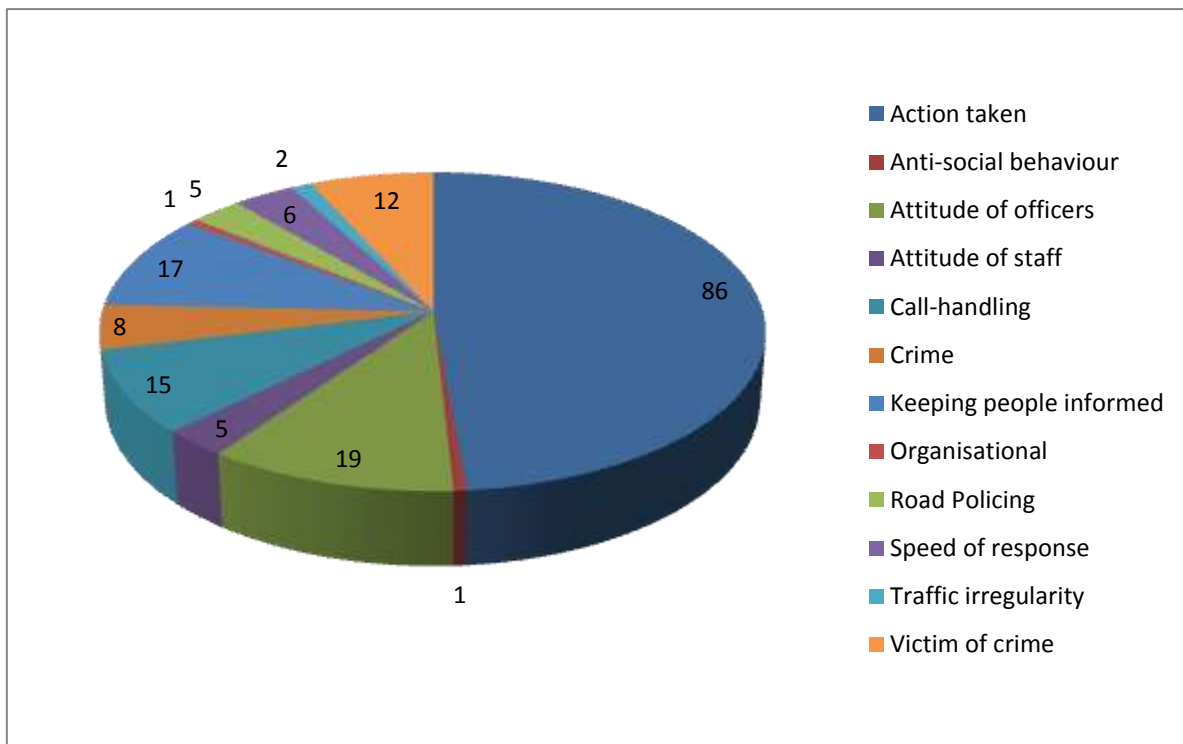
The complainant in this case had wanted to report an incident and was unhappy that the Suffolk Police station they attended was no longer open to the public when the town was growing. The complaint was locally resolved and the policy in relation to this was not reviewed.

Service Recovery

On 7 July 2014, Service Recovery was introduced to replace the Dissatisfaction process in order to deal with low level matters, where there is no complaint, quickly and to the satisfaction of the member of public. This process is managed by Professional Standards which allows a consistent approach to dealing with all issues raised by the public concerning the service they receive.

During the period, 1 April to 30 September 2017, 177 Service Recovery issues have been recorded. Each issue is categorised into the reasons for the matter being raised.

(Chart 5): The below chart details those categories and the numbers recorded under each:



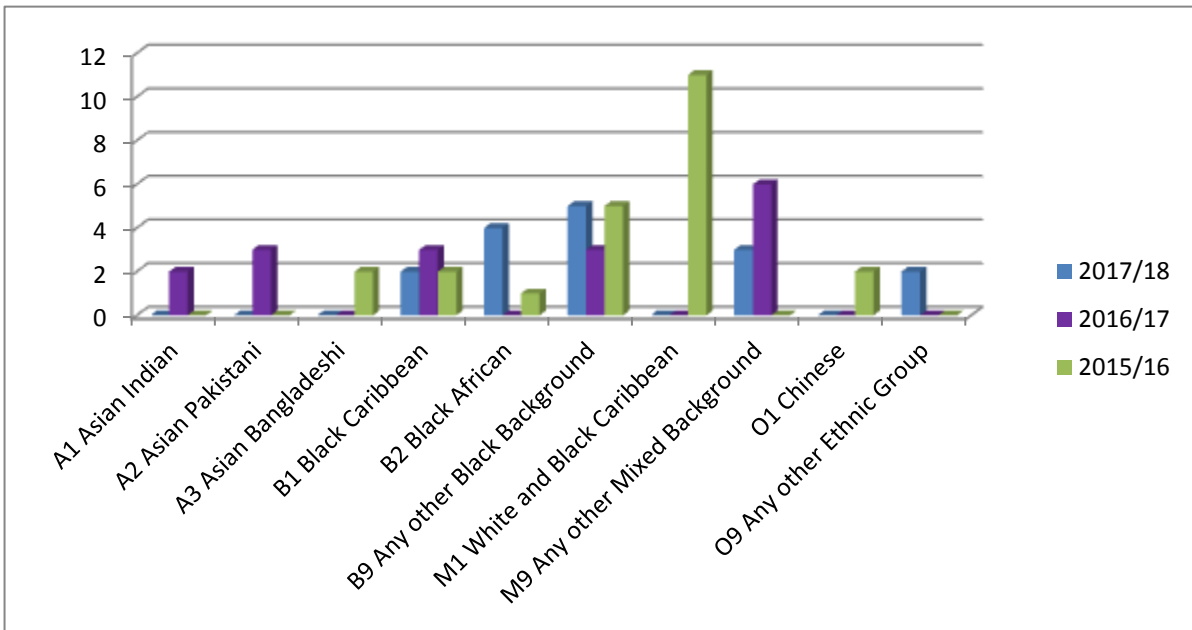
Once the Service Recovery process is entered, the member of public is still able to make a formal complaint if they wish to do so. Of those issues recorded as Service Recovery, 8 (4.5%) were unable to be resolved under this process, were recorded as public complaints and dealt with under the Police Reform Act 2002 (PRA 2002).

Complaints made by Black and Minority Ethnic Groups

In the reporting period, 1 April to 30 September 2017, 6 public complaint cases were recorded where the complainant is self-declared as Black and Minority Ethnic.

A total of 6 complainants are linked to the complaint cases and 8 separate allegations have been recorded. In addition to those 8, a further 8 allegations have been recorded against complaint cases recorded prior to the reporting period.

Of the 340 total allegations recorded for the period, 4.7% were made by a complainant from a BAME group. This compares to 17 allegations in 2016/17 (5%) and 23 allegations in 2015/16 (8%).



(Chart 6): The above chart displays the 16 allegations recorded within the reporting period for 2017/18 in comparison to the same period the previous two years, against the self-classification of the complainant, provided at the time the complaint was reported or during the investigation.

The most common allegations made by the complainants are ‘Discriminatory behaviour’ and ‘Other neglect or failure in duty’. A total of 4 allegations have been recorded against each category. This is followed by 2 allegations each of ‘Incivility, impoliteness and intolerance’ and ‘Other assault’. The remaining allegations are recorded as ‘ Mishandling of property’, ‘Oppressive conduct or harassment’, ‘Irregularity in evidence/perjury’ and ‘Sexual assault’.

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Examples of some of the allegations recorded between 1 April and 30 September 2017 are detailed as follows;

B1 – Black Caribbean	Allegation that following a report to police in 2015 of threats, the complainant has heard nothing further from police causing them to be in fear of harassment
B2 – Black African	Allegation the officer used discriminatory overtones and stereotyped the complainant when dealing with them regarding a traffic matter
B9 – Any other Black Background	Allegation that the complainant's property was thrown on the floor when being released from custody
M9 – Any other Mixed Background	Allegation the officer did not contact the complainant when they said they would resulting in the complainant having to make contact with police again
O9 – Any other Ethnic Background	Allegation the officer was rude and dismissive towards the complainant when investigating the crime

PCC Case Sampling

Professional Standards Department and the Office of the Police and Crime Commissioner have agreed a protocol for the process of case sampling public complaint files which have been finalised. The purpose of this protocol is to ensure that complaints are being dealt with proportionately and fairly in accordance with the IPCC Statutory Guidance to the Police service on handling of complaints (2013) and the Force's Policy documents and processes. For example, that cases and related allegations are recorded appropriately and stages of the process of dealing with the complaint are consistently in line with expectations of the guidance.

Due to staff changes within the Suffolk OPCC no complaint cases have been sampled during this time period. However, Suffolk PCC's new correspondence officer has met with PSD and received initial training on Centurion (PSD Case handling system) and dip-sampling will be undertaken over the coming months with outcomes reported in the next report in June.

Discipline Outcomes

GROSS MISCONDUCT MEETINGS 1 APRIL TO 30 SEPTEMBER 2017		
1	A police officer attended a misconduct hearing for Discreditable conduct Inappropriately touched a colleague and made comments	Final Written Warning
2	A police officer attended a special case hearing for Discreditable conduct Found guilty at court for criminal offence	Dismissed
3	A member of police staff attended a hearing for Authority, respect and courtesy Inappropriate comments on social media	Final Written Warning
MISCONDUCT MEETINGS		
1	A police officer attended a misconduct meeting for Authority, respect and courtesy Inappropriately touched colleague whilst off duty	Final Written Warning
2	A police officer attended a misconduct meeting for Duties and responsibilities Discrepancies in working times	Management advice
3	A police officer attended a misconduct meeting for Discreditable conduct Inappropriate behaviour whilst off duty	Final Written Warning
4	A member of police staff attended a disciplinary meeting for Confidentiality Accessed Force systems for a non-policing purpose	Final Written Warning

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5	<p>A member of police staff attended a disciplinary meeting for Honesty and integrity</p> <p>Undertook additional employment without authority</p>	Written warning
6	<p>A police officer attended a misconduct meeting for Duties and responsibilities and Orders and instructions</p> <p>Neglected duties by being away from policing area engaged in non-policing matters and failed to follow instruction of supervising officer</p>	Final Written Warning and management action

Lessons Learned

Below is a small selection of the Lessons Learned which have been recorded as a result of Public Complaints made in Suffolk. All lessons identified during the investigation are collated, actioned and tracked to ensure a suitable conclusion. A monthly 'Learning Times' bulletin is produced by PSD in order to disseminate the learning Force wide. The Independent Police Complaints Commission (IPCC) publish their own 'Learning the Lessons' bulletin focusing on national lessons identified and each bulletin is reviewed within Professional Standards and issues disseminated for awareness.

<u>Origin of Lesson</u>	<u>Summary</u>	<u>Lessons identified</u>	<u>Action</u>
Public Complaint	The complainant was a victim of burglary and the investigating officer failed to adhere to the Victim's Contract in relation to the timescales set out	Officers must at all times adhere to the Victim's Contract agreed at the beginning of the investigation. Should they be unable to do so, due to other commitments this must be brought to the supervisors' attention who can arrange contact by other officers.	Disseminated to the County Policing Command officers and raised at the one to one meeting with Command Heads.
Public Complaint	Complaint that officers failed to inform the complainant of their mothers' death and found out through a third party	The officer made several attempts/enquiries to make contact with the next of kin but was unable to reach them. The necessary paperwork was completed and submitted to the Coroner's office advising that next of kin had not been informed and was under the impression this would be completed by staff at the Coroner's office.	Officers to be made aware that it is not the responsibility of the Coroner's office staff to inform the next of kin. The investigating officer has requested the Policy is reviewed to make the wording clearer for officers. Included in the August Learning Times publication and disseminated to County Policing Command officers
Conduct investigation	During a conduct investigation it was identified that officers were not correctly using the status buttons on the Airwave radios and not updating their vehicle index	If officers fail to update their status and vehicle details it can prove difficult for the Control Room to manage their resources	An entry was made in Suffolk Force Orders in March 2017 to reiterate the importance of officers using their status button and updating vehicle indexes. This was again reiterated in May 2017 following the recent terror attack and has been included in the October Learning Times publication

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<p>General file</p>	<p>A bicycle was seized when a member of the public was arrested. The bike was left insecure in the public accessed cycle rack at the entrance to the PIC in order that the detainee could use it on release. The detainee was remanded in custody then received a custodial sentence at court. When released, no trace of the bicycle was found</p>	<p>The bicycle was not seized as potential evidence but was property in possession of the person when arrested and needed to be recorded as such.</p>	<p>All officers received management action in the form of words of advice as they did not ensure the safe keeping of the bicycle. Disseminated to County Policing Command officers and included in the August Learning Times publication</p>
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Glossary

Complaint Case – A single complaint case may contain one or more linked allegations, made by one or more complainants, against one or more persons serving with the Police.

Allegation – Describes the type of behaviour complained about. A single complaint case can have one or more attached allegations. For example, a person may allege that they were pushed by an officer and that the officer was then rude to them. This would be recorded as two separate allegations forming one complaint cases. An allegation is recorded against an allegation category.

Local Resolution – For less serious cases, such as rudeness or incivility, a complainant may agree to Local Resolution. This usually involves a local police supervisor handling the complaint and agreeing with the complainant a mutually acceptable way of addressing the issue. This may be through a more thorough explanation, an apology or an outline of what actions will be taken in order to prevent future complaints of a similar nature.

Investigation – In other circumstances a thorough investigation of circumstances may be necessary. This involves the appointment of an investigating officer which will examine allegations and report upon whether each allegation is ‘Upheld’ or ‘Not Upheld’. A complaint will be recorded as ‘Upheld’ if the service or conduct complained about does not reach the standard a reasonable person would expect. The outcome, therefore, is not solely linked to proving misconduct.

Local Investigations – Investigations carried out entirely by the Police. Complainants have a right of appeal to the IPCC following a local investigation.

Supervised Investigations – Investigations carried out by the Police under their own direction and control. IPCC sets out what the investigation should examine (terms of reference) and will receive the investigation report upon completion. Complainants have a right of appeal to the IPCC following a supervised investigation.

Managed Investigations – Investigations carried out by Police under the direction and control of the IPCC.

Independent investigations – Investigations carried out by IPCC investigators and are overseen by IPCC Commissioners.

Special Requirements – If at any time during an investigation of a complaint, it appears to the investigator that there is an indication that a person whose conduct the investigation relates may have; committed a criminal offence; or behaved in a manner which would justify the bringing of disciplinary proceedings then the investigator must certify the investigation as one subject to special requirements.

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Discontinuance – Forces may find it impractical, on occasion, to conclude an investigation. This could occur if a complainant fails to cooperate, if the complaint is repetitious or refers to an abuse of procedure. In such cases, an application can be made to the Appropriate Authority to discontinue the investigation.

Disapplication – Introduced in the new Statutory Guidance, to replace Dispensation, an application can be made to the Appropriate Authority to disapply a complaint on the grounds that the complaint is over 12 months old, already subject of a complaint, remains anonymous, is vexatious or repetitious.

Withdrawn – No further action may be taken with regard to a complaint if the complainant retracts the allegation(s).

Sub judice – Subsequent to recording, the start of any work on a complaint may be postponed due to the matter being considered ‘sub judice’. This is when a person linked to a complaint case is associated with separate criminal proceedings. The complaint is reviewed by the Complaint Manager regarding any prejudice in investigating the complaint and a decision made as to whether the matter should be sub judice.

Investigation appeal - This applies to all complaints investigated by the force itself or where the investigation has been supervised by the IPCC. There is no avenue of appeal from independent or managed investigations.

Local resolution appeal – Complainants are entitled to appeal to the Appropriate Authority against the local resolution outcome.

Complainants - Under the PRA 2002, a complaint about the conduct of someone serving with the Police can be made by the following types of people:

- a) Any member of the public who alleges that police misconduct was directed at them
- b) Any member of the public who alleges that they have been ‘adversely affected’ by police misconduct, even if it was not directed at them
- c) Any member of the public who claims that they witnessed misconduct by the police
- d) A person acting on behalf of someone who falls within any three of the categories above. This category of person is classed as an ‘agent’ or ‘representative’, not as a complainant in their own right, and must have the written permission of the complainant.

Being ‘adversely affected’ is broadly interpreted in the legislation and includes distress, inconvenience, loss or damage, or being put in danger or at risk. This might apply, for example, to other people present at the incident, or to the parent of a child or young person, or a friend of the person directly affected. It does not include someone distressed by watching an incident on television. A witness is defined in the PRA 2002 as someone who ‘acquired his knowledge of that conduct in a manner which would make him a competent witness capable of giving admissible evidence of that conduct in criminal proceeding’. This includes, for example, someone in control of CCTV cameras or in possession of material evidence. One complaint case can have multiple complainants attached and one individual can make more than one complaint within the reporting year.

Subjects – The PRA 2002 broadened the range of people who could be subject to a complaint. Complaints can be made against the following police personnel;

- a) Police officers of any rank
- b) Police staff, including Community Support Officers and Traffic Wardens
- c) Special constables
- d) Contracted-out staff designated under section 39 of the PRA 2002 – for example, escort or custody officers employed by another company.

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