



SUFFOLK
CONSTABULARY

PROFESSIONAL STANDARDS DEPARTMENT

COMPLAINTS OVERVIEW

1 April 2022 to 31 March 2023

OFFICIAL

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Introduction

This report presents figures on complaints relating to Suffolk Constabulary, received during the period, 1 April 2022 to 31 March 2023. 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 43-44 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 362 complaints were received in the reporting period, 1 April 2022 to 31 March 2023. Of these complaints, 301 were recorded under Schedule 3 and 61 were logged outside of Schedule 3 of the PRA 2002.

To compare with the previous year 2021/22, 374 complaints were received and of these, 292 were recorded under Schedule 3 and 82 were logged outside Schedule 3.

This is a decrease in complaints received of 3% compared to the previous 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 in the reporting period.

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The largest area of complaint has been recorded under the category of Delivery of duties and service. Of the 1,111 allegations recorded under new Regulations in the reporting period, 443 have been recorded under this category, which is 39.9% 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 (187 allegations – 16.8%)
- A3 Information (95 allegations – 8.6%)
- A4 General level of service (95 allegations – 8.6%)
- B4 Use of force (86 allegations – 7.7%)
- H5 Overbearing or harassing behaviours (74 allegations – 6.7%)

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 362 complaints received in the reporting period, 74.9% were logged within 2 working days and 78% of complainants were contacted within 10 working days.

The database used to record Complaints was upgraded on 19 October 2022 resulting in concerns about the functionality due to error messages and updates to cases not saving. Ongoing dialogue with the ICT department and the suppliers was held to resolve the issues but eventually the database became unusable on 24 November 2022. The Complaints process was switched to manual records for a period of 6 days while a fix was created and rolled out. The issues will have had an impact on timeliness to log and contact complainants.

- 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 273 complaints have been finalised in the reporting period and of those, 8.4% were investigated, 62.3% were handled otherwise than by investigation and 16.8% 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 complaints were either withdrawn, 11.4%, or discontinued, 1%, where the complaint 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 68 complaints finalised in the reporting period, 60 were resolved which is 88.2% of cases. If the complainant is dissatisfied with the outcome of their complaint, they can ask for their complaint to be recorded under Schedule 3.

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- All allegations are finalised to show the action taken as a result. Actions can include providing the complainant with an explanation, 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, as well as the actions taken to resolve complaints outside of Schedule 3.
- 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 378 complainants have made the 362 complaints received in the reporting period. The ethnicity of complainant has been recorded where it has been provided and in the reporting period 78.3% of cases contain the complainants' ethnic details. This is an increase from the previous year, 2021/22 where 73.7% of complainants provided their ethnicity.

Of the 378 complainants recorded on the 362 complaint cases, 9.5% are BAME, 68.8% are White and 21.7% are unknown ethnicity.

- Of the total 1,111 allegations recorded in the reporting period, 57 have been made alleging discrimination. Of these, 31 have been made under the protected characteristic of race which is 54.4% of the discrimination allegations recorded. 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 462 Suffolk Police officers, Special Constables and members of police staff are identified on the complaints recorded. Of the 425 Police officers and Special Constables, 2.6% are BAME, 95.5% are White and 1.9% are unknown/not stated.
- The learning identified from complaints, internal investigations and other matters referred to PSD are summarised and grouped within themes later in this report.
- Complaints recorded under Schedule 3 of the PRA 2002 allow complainants to request a review if they remain dissatisfied with the outcome of their complaint. In the reporting period the IOPC upheld 12 reviews and the Local Policing Body upheld 6 where they determined that the outcome of the complaint was not reasonable and proportionate.
- 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 2022 to 31 March 2023, 11 Chapter 13 reports have been sent. Seven relate to complaint cases and four relate to conduct cases.

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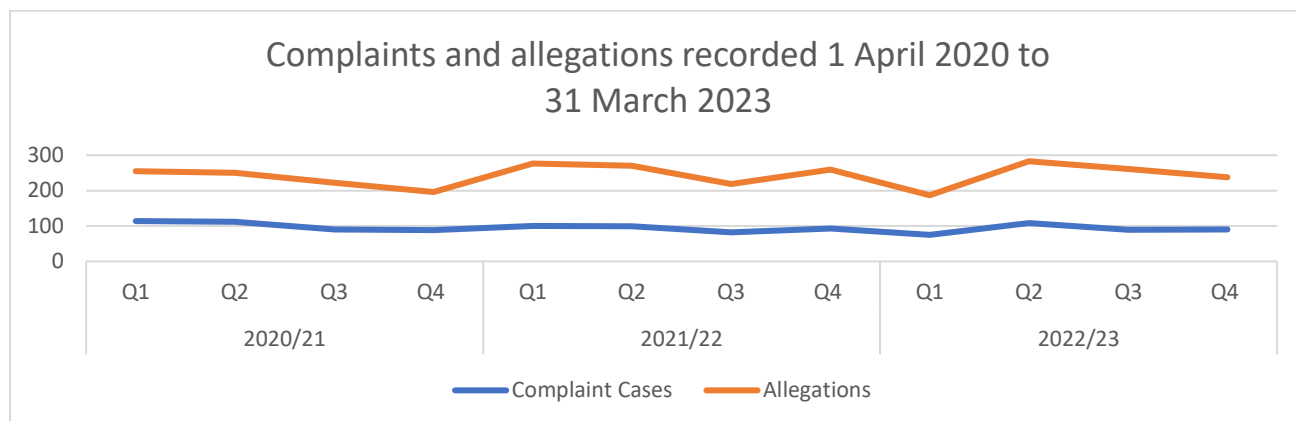
- A total of 52 internal conduct cases were recorded in the reporting period which is an increase of 33% compared to the previous year.

- In the reporting period eight misconduct hearings were held for officers and staff. Two individuals were dismissed, four would have been dismissed had they not resigned, one received a Final Written Warning, and one received a Written Warning. The two misconduct meetings held within the reporting period resulted in a Written Warning and referral to the Reflective Practice Review Process.

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>
2020/21	Q1	74	40	114	255
	Q2	72	40	112	250
	Q3	62	28	90	222
	Q4	57	31	88	196
2021/22	Q1	77	23	100	277
	Q2	77	22	99	270
	Q3	64	18	82	219
	Q4	74	19	93	259
2022/22	Q1	64	11	75	187
	Q2	82	26	108	283
	Q3	76	13	89	261
	Q4	79	11	90	238

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.

All complaints received prior to the introduction of the new Regulations are recorded under Schedule 3 of the Police Reform Act.

Schedule 3 and outside Schedule 3 complaints

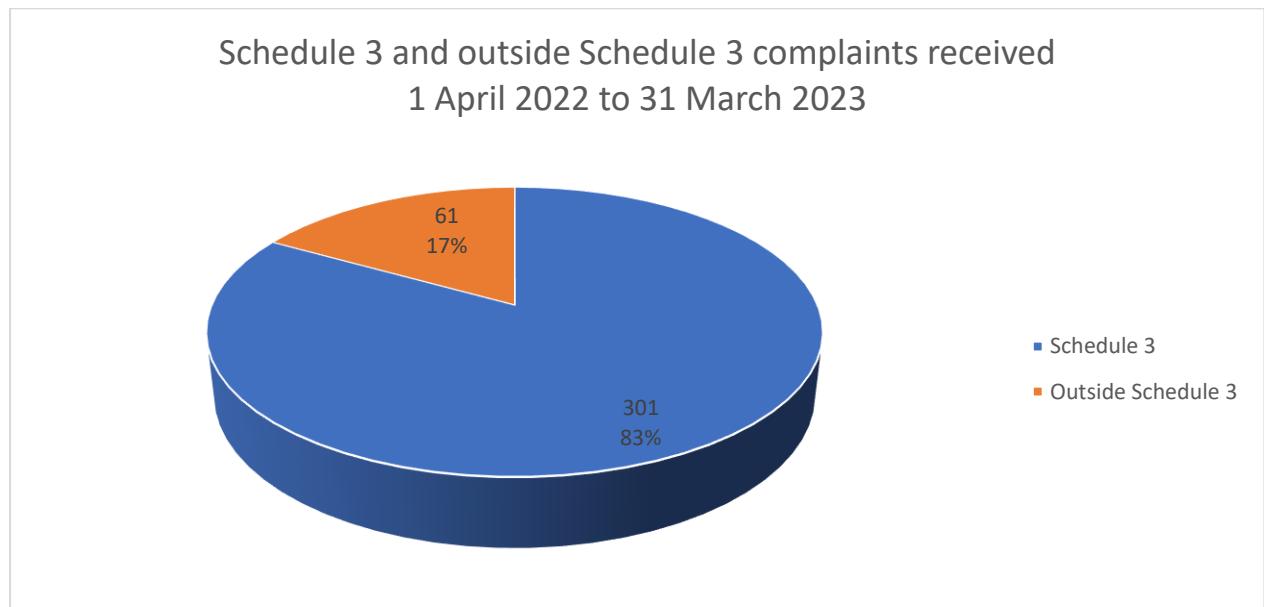
The IOPC Statutory Guidance states:

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, 1 April 2022 to 31 March 2023, broken down into either recorded under Schedule 3 of the PRA Act 2002 or logged outside of Schedule 3:



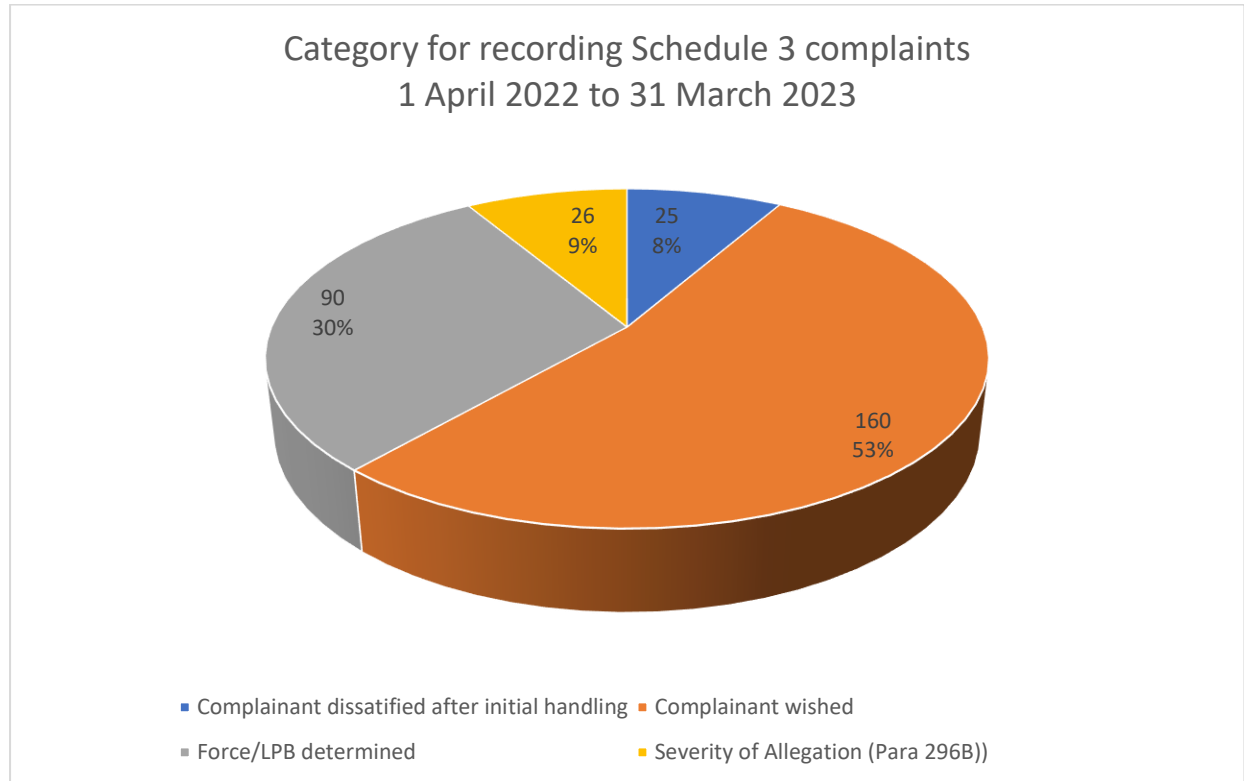
Of the complaints received, 83% have been recorded under Schedule 3, with the remaining 17% logged outside of Schedule 3.

To compare this to the previous year, 78% of complaints were recorded under Schedule 3, with the remaining 22% logged outside.

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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:



As a result of a discussion with the IOPC regarding the data capture for Q3 2022/23, it was highlighted that our recording decisions were not aligned to other most similar Forces. We were recording a high percentage of cases where, 'the complainant wished.'

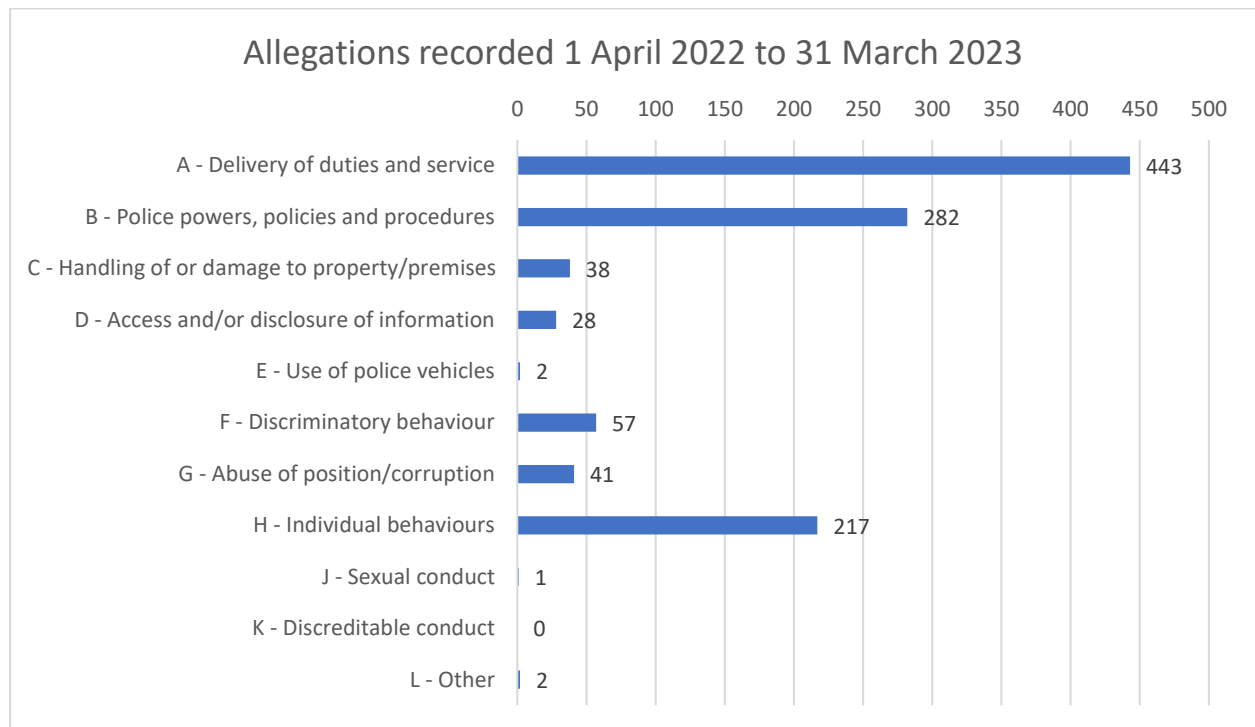
The IOPC held a workshop in January 2023 and following additional explanation of the Statutory Guidance we reviewed our recording decisions. This is reflected in an increase in recording decisions under the heading, 'Force/LPB determined.' These are cases where the nature of the allegations wouldn't lead to them ordinarily being recorded, but the matter has been recorded because the Appropriate Authority believes it to be reasonable and proportionate to do so.

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 added to 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 1,111 allegations recorded, 443 have been recorded under this category, which is 39.9% of the total.

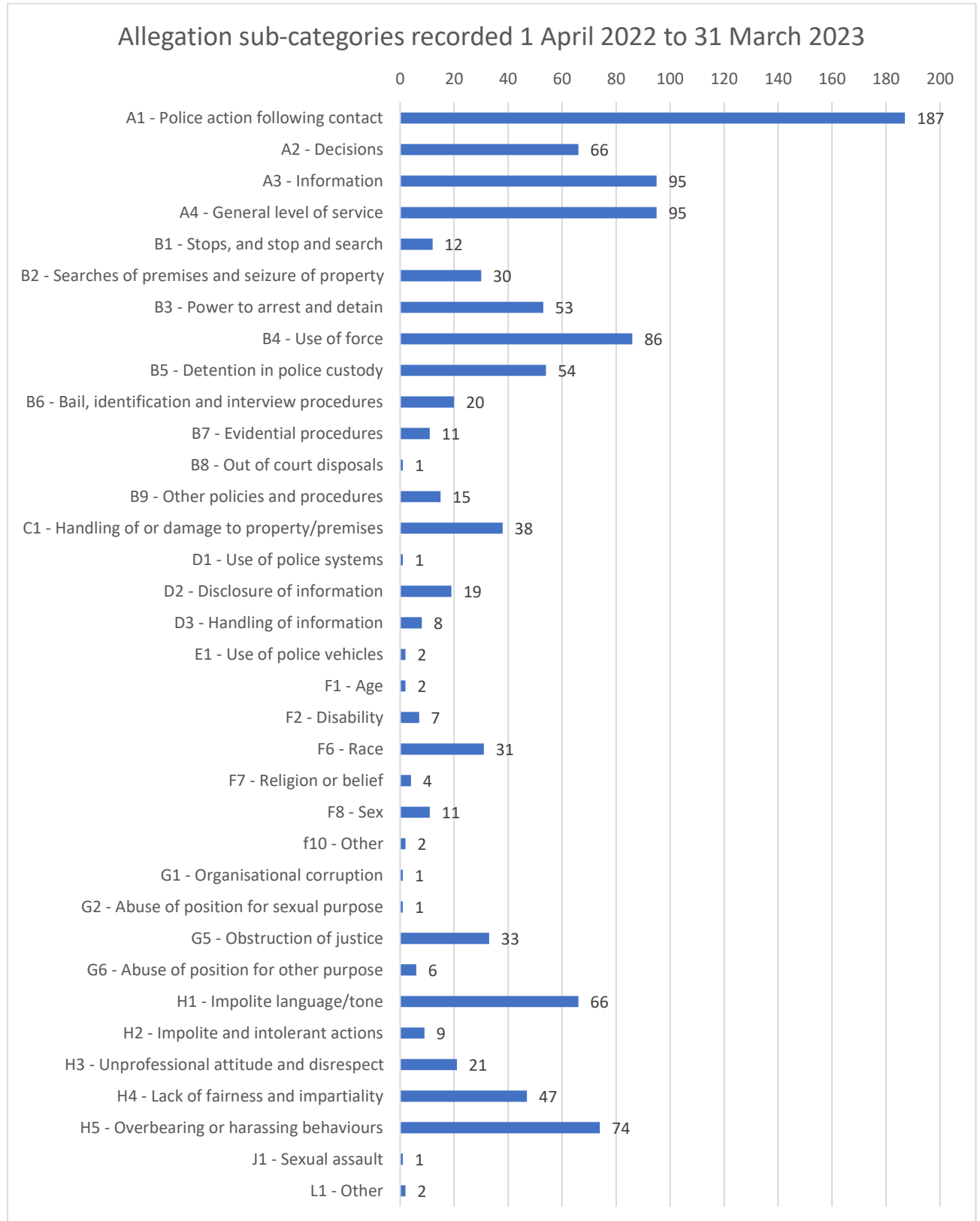
The types of complaint recorded under Delivery of duties and service relate to the service received by the complainant, in terms of the action of officers following contact (the police response to calls from the public), operational and organisational decisions (how the Force decides what action to take),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

The second largest category of complaint is Police powers, policies and procedures which is 25.4% of all allegations recorded and by Individual behaviours, which is 19.5%.

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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 1,111 allegations recorded in the reporting period:



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The largest sub-category recorded is Police action following contact and it shows that 16.8% of allegations are recorded under this category. The types of complaint defined under this category can include:

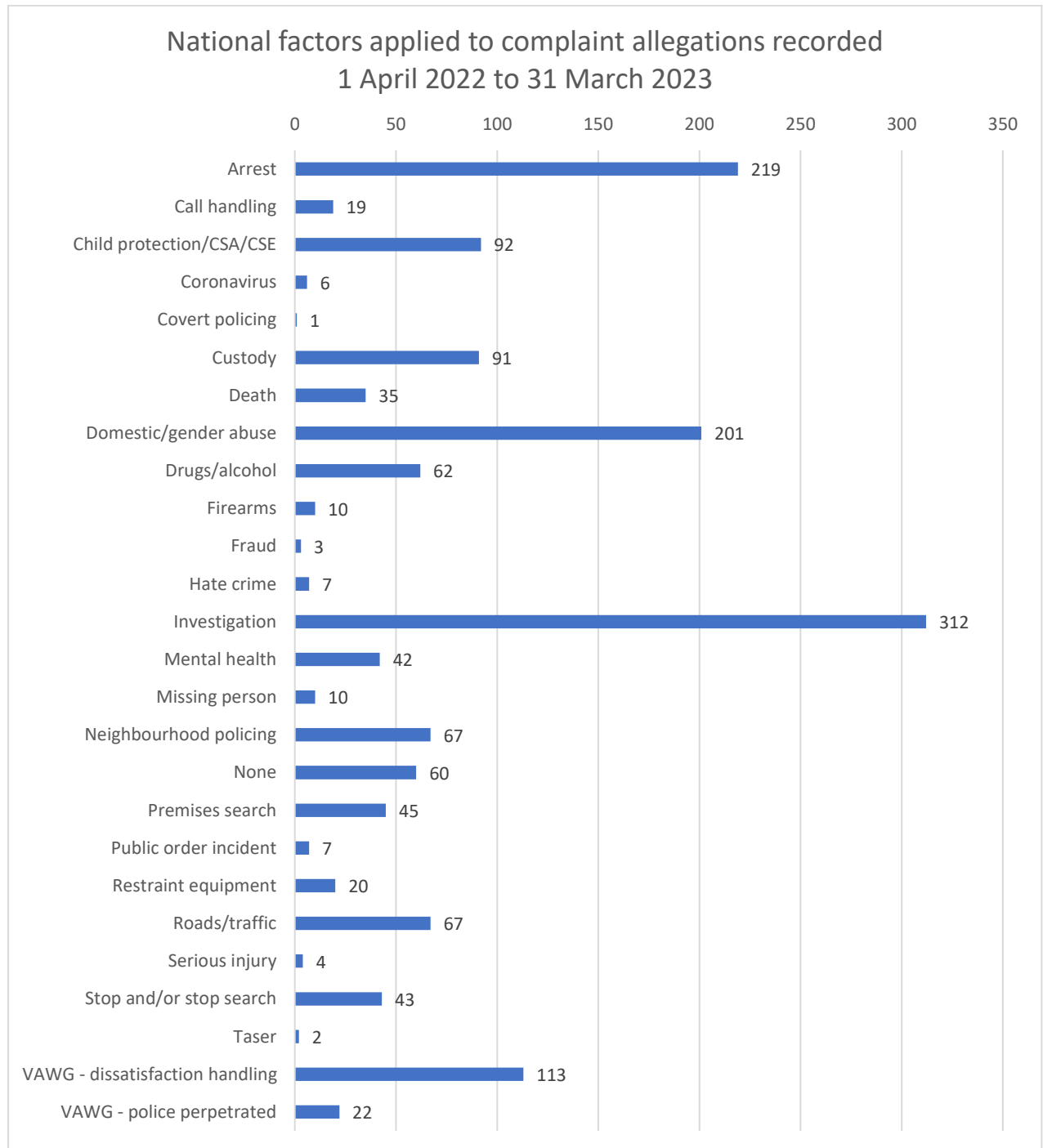
- No or insufficient action in response to a reported incident. For example: the number of officers deployed to an incident or no officers attended, no action taken by the police, or a failure to investigate.
- The size, nature or quality of an investigation. This includes allegations that evidence was 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.

The IOPC Quarterly Complaints Statistics for Q1-Q3 2022/23 shows that nationally, 25% of allegations are recorded under the sub-category of Police action following contact.

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 1,111 allegations recorded in the reporting period:



The most frequently used national factor is Investigation which has been applied to 312 allegations and is 28% of all allegations recorded.

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Where the national factor of Investigation is applied to the allegations, over half, 54.2%, have been recorded under the complaint category of Delivery of duties and service, with the largest number of allegations being linked to Police action following contact.

Of the 312 allegations, 48.7% have been linked to crime enquires:

- 15% relate to an allegation of failure to investigate
- 11% relate to a failure to update
- 7% relate to a failure to secure and/or ask for evidence
- 6% are dissatisfied with the conclusion/outcome of the investigation
- 4% are dissatisfied with the time taken to investigate
- 2% made an allegation of failure to record a crime

The second most frequently used national factor is Arrest and where it is applied to the allegations, 59% have been recorded under the category of Police powers, policies and procedures, with the largest number being linked to Use of force and Power to arrest and detain:

- 27% of complaints allege the use of excessive force during arrest or whilst in custody
- 23% of allegations relate to the power to arrest and detain whereby complainants state the arrest was unlawful or unnecessary

Of the 51 allegations recorded under the complaint category of Power to arrest and detain, 33 have been finalised to date with none being determined that the service was not acceptable.

The third most frequently used national factor is Domestic/gender abuse and this national factor has been applied to 201 allegations, which is 18% of all allegations recorded. Almost half the allegations, 96, have been recorded under the category of Delivery of duties and service. The national factor of VAWG – dissatisfaction handling has been applied to 62 of the allegations and relates to complaints around the handling of VAWG cases.

Violence against women and girls (VAWG)

In March 2022, the VAWG taskforce from the College of Policing (CoP) contacted all Forces to request that complaints and conduct cases recorded in the year 2021 be reviewed and national factors applied to cases. A further data collection was obtained in September 2022 and the benchmark data was published on 15 March 2023, for the reporting period October 2021 to March 2022, around police perpetrated VAWG.

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	2	4
	Q2	2	7
	Q3	1	10
	Q4	5*	17**
2021/22	Q1	2	12
	Q2	2	12
	Q3	3	7
	Q4	3	10
2022/23	Q1	3	8
	Q2	2	4
	Q3	4	9
	Q4	3	7

*One complaint logged in Q4 2020/21 was received in Force in April 2020 but not referred to PSD until February 2021 at which point it was logged. This is reflected in the average working days recorded, without this case the average would be 2 days.

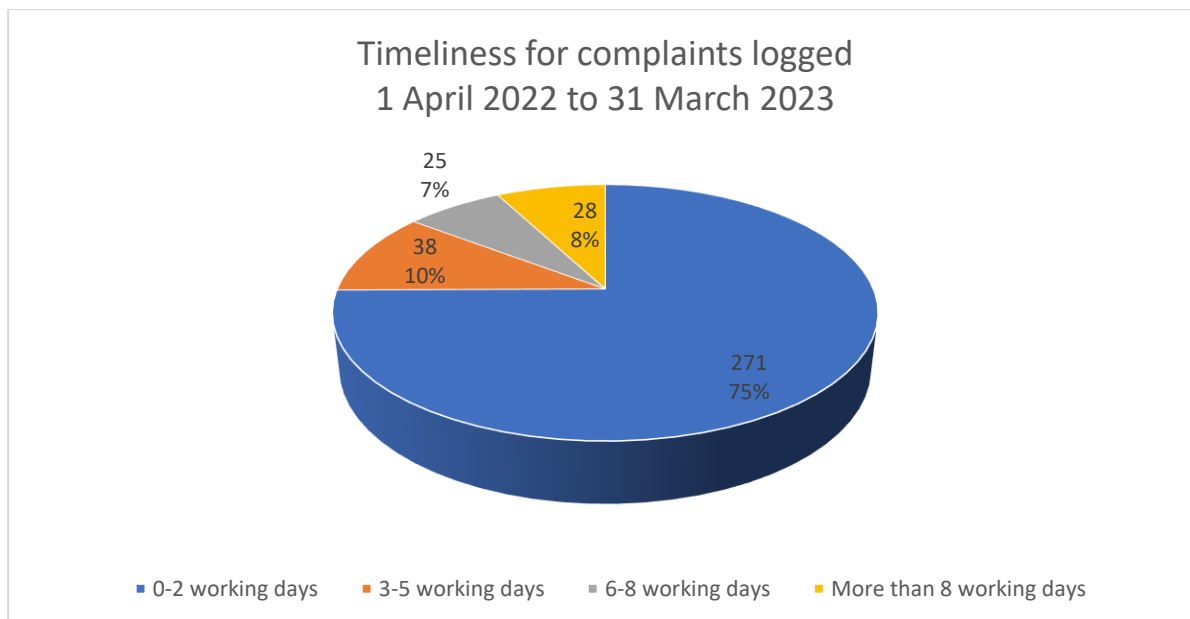
**The case referred late to PSD has also impacted on the average working days to contact the complainant. If this case were not included, the average would be 15 days.

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

<u>Measure</u>	<u>1 April 2021 to 31 March 2022</u>	<u>1 April 2022 to 31 March 2023</u>
% of cases logged within 2 working days	86.1%	74.9%
% of cases logged within 3-5 working days	5.3%	10.5%
% of cases logged within 6-8 working days	2.1%	6.9%
% of cases logged in more than 8 working days	6.4%	7.7%
% of complainants contacted within 5 working days	25.6%	45.2%
% of complainants contacted within 6-10 working days	33.3%	32.8%
% of complainants contacted in more than 10 working days	41.1%	22%

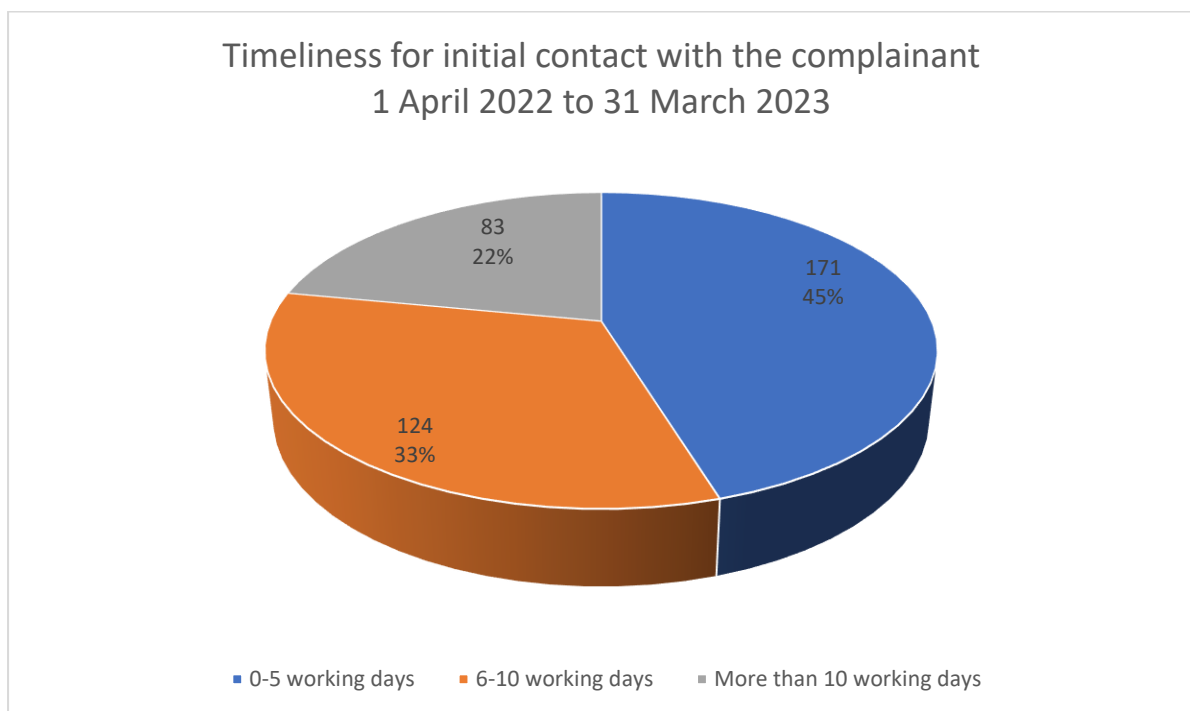
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(Chart 7): The chart below shows the timeliness for complaint cases logged in Professional Standards in the reporting period:



Of the 362 complaints received under new Regulations, 74.9% were logged within 2 working days.

(Chart 8): The following chart shows the timeliness recorded for initial contact with the 378 complainants who made the 362 complaints:



Over the 12-month reporting period, it took on average 7 working days to make initial contact with the complainant and 78% of complainants were contacted within 10 working days.

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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 high at 74.9%.

The average time to make contact with the complainant over the 6-month period is 7 working days and 78% of complainants were contacted within 10 working days.

The database used to record Complaints was upgraded on 19 October 2022 resulting in concerns about the functionality due to error messages and updates to cases not saving. Ongoing dialogue with the ICT department and the suppliers was held to resolve the issues but eventually the database became unusable on 24 November 2022. The Complaints process was switched to manual records for a period of 6 days while a fix was created and rolled out. The issues will have had an impact on timeliness to log and contact complainants.

The level of contact from complainants remains high and in the last 12 months 2,623 contacts were made to the Joint Professional Standards Department, compared to 2,595 contacts in 2021/22.

The introduction of the Early Intervention Officers and changes to our processes has seen a significant improvement in timeliness for contact with complainants, as well as improvements to the level of service we are now able to provide utilising the 'Listen, Say Sorry, Fix-it' principle.'

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Complaint and allegation outcomes (Schedule 3)

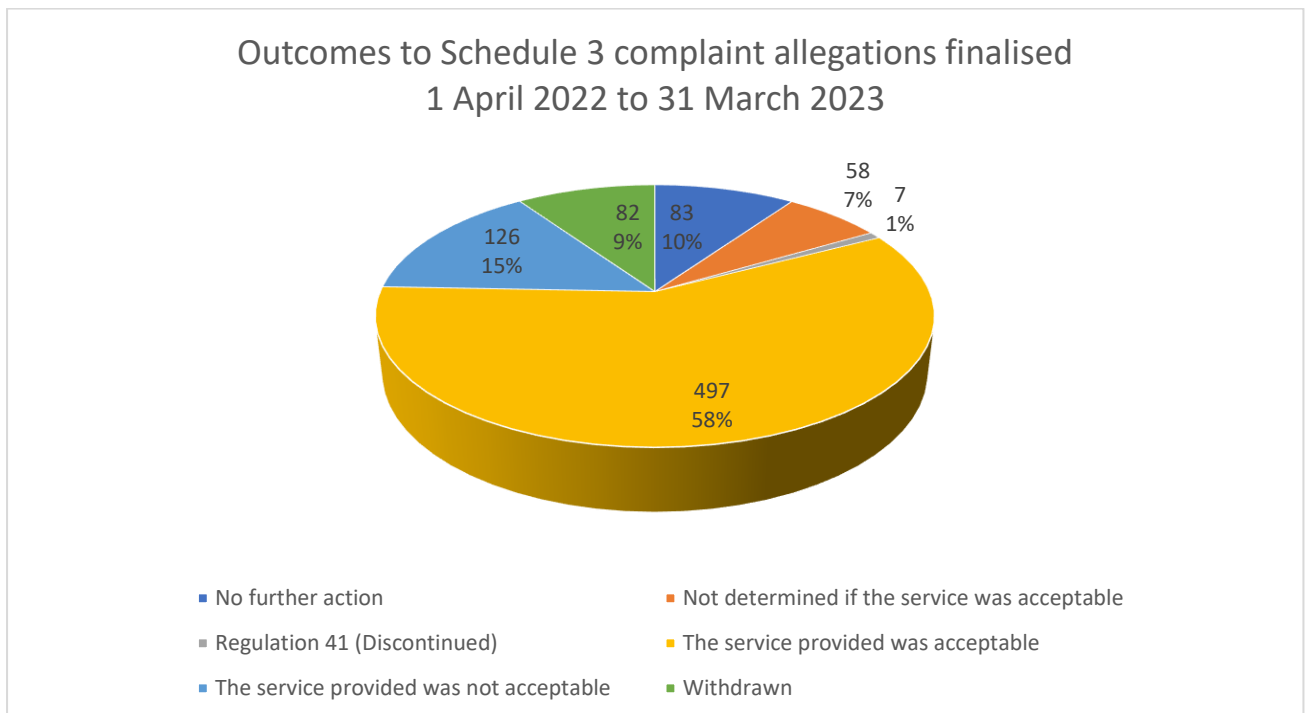
Under new Regulations, Schedule 3 complaints will either be investigated, handled otherwise than by investigation (responding to concerns raised and seeking to resolve them) or determined that no further action will be taken.

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

(Table 4): A total of 273 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	3	31	11	1	5
2021/22	Q1	7	15	18	2	2
	Q2	10	45	24	1	6
	Q3	6	36	17	2	6
	Q4	7	30	9	2	1
2022/23	Q1	5	29	20	0	6
	Q2	7	47	13	0	8
	Q3	5	47	4	2	6
	Q4	6	47	9	1	11

(Chart 9): Every complaint contains at least one allegation. The chart below details the outcomes to the 853 complaint allegations finalised in the reporting period, on Schedule 3 complaints:

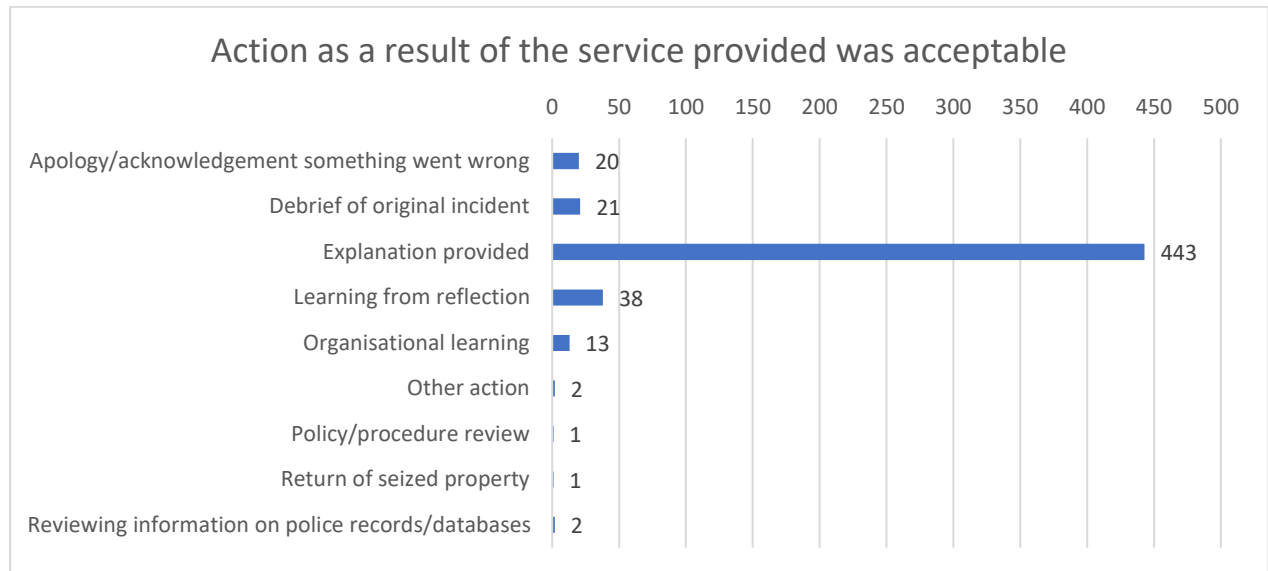


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Allegations resulted under the new Regulations have an action recorded for each allegation, which shows how the matter has been resolved.

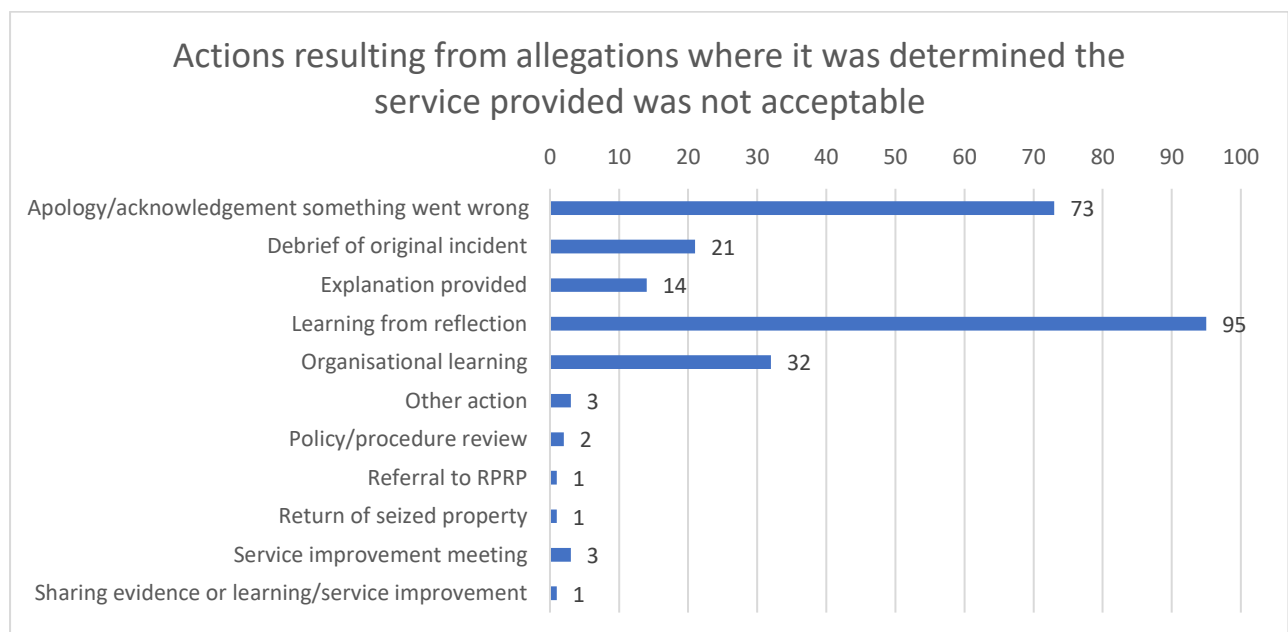
Even where it has been determined the service provided was acceptable, there are opportunities to resolve the issues and learn from the complaints in a number of ways.

(Chart 10): The graph below shows the actions which have resulted from the 497 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 has been identified and, where appropriate, an apology given. A debrief of the incident allow those involved the opportunity to reflect on the circumstances.

(Chart 11): It was determined that the service provided was not acceptable for 126 allegations. These 126 allegations have resulted in the following actions:



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The largest action recorded is Learning from reflection, followed by an apology or acknowledgement to the complainant that something went wrong.

(Table 5): The table below shows the average working days taken to deal with all complaint cases recorded under Schedule 3, for cases finalised quarterly in the reporting period. This is calculated from the date the complaint is recorded to the date the complainant is informed of the outcome. The working days do not include any time the case was suspended due to being sub judice:

<u>Year</u>	<u>Quarter</u>	<u>Average working days (not including time suspended)</u>
2021/22	Q1	53
	Q2	69
	Q3	54
	Q4	82
2022/23	Q1	75
	Q2	88
	Q3	75
	Q4	82

In the reporting period, cases handled under Schedule 3 took on average 80 working days to finalise from the date the complaint was recorded to the date the complainant was informed of the result, excluding time 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 one officer was referred for reflective practice.

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.

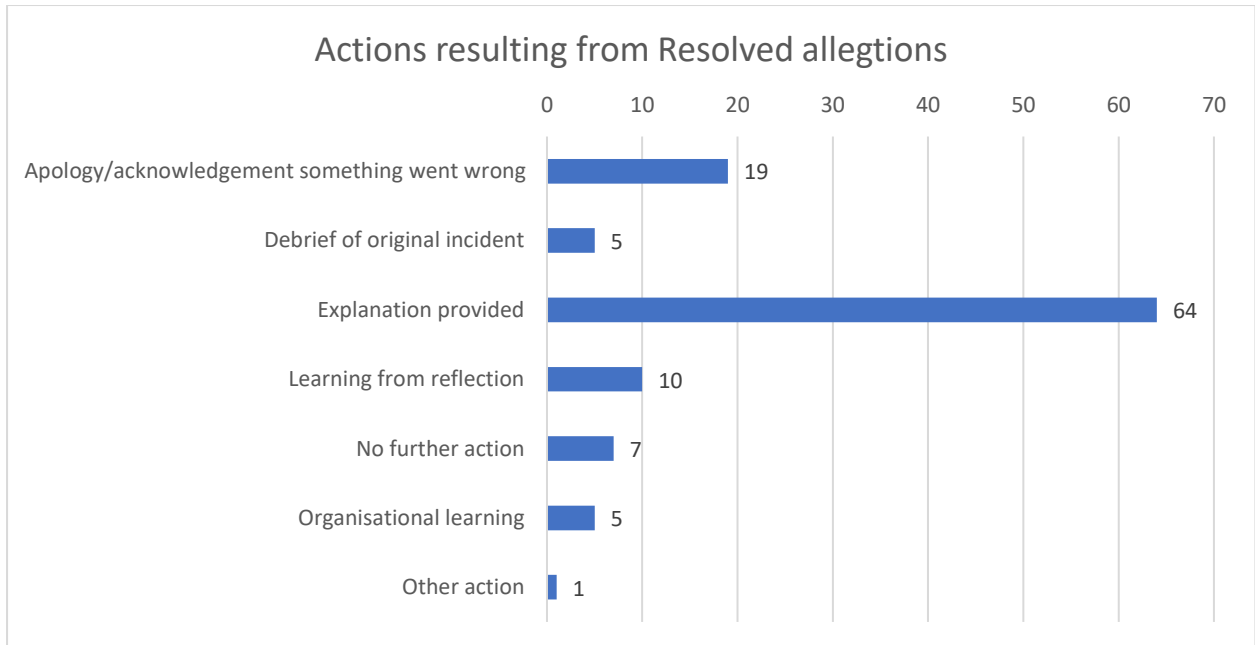
Complaint and allegation outcomes (Outside Schedule 3)

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, complainants may only want an explanation or for their concerns to be noted.

(Table 6): A total of 68 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	26	2
	Q2	35	3
	Q3	30	3
	Q4	23	5
2021/22	Q1	25	2
	Q2	27	4
	Q3	11	2
	Q4	15	1
2022/23	Q1	13	3
	Q2	21	3
	Q3	21	0
	Q4	5	2

(Chart 12): The graph below shows the actions resulting from the 97 allegations which were resolved in the reporting period:



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 to resolve their concerns.

The action listed as 'other action' related to Operational decisions regarding ongoing issues.

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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, 4 cases were moved to Schedule 3.

(Table 7): The table below shows the average working days taken to deal with complaint cases logged outside Schedule 3, for cases finalised quarterly in the reporting period. The working days are calculated from the date the complaint is recorded to the date the complainant is informed of the outcome.

<u>Year</u>	<u>Quarter</u>	<u>Average working days</u>
2021/22	Q1	47
	Q2	51
	Q3	29
	Q4	34
2022/23	Q1	49
	Q2	39
	Q3	36
	Q4	27

In the reporting period, cases handled outside of Schedule 3 took on average 40 working days to finalise from the date the complaint was recorded to the date the complainant was informed of the result.

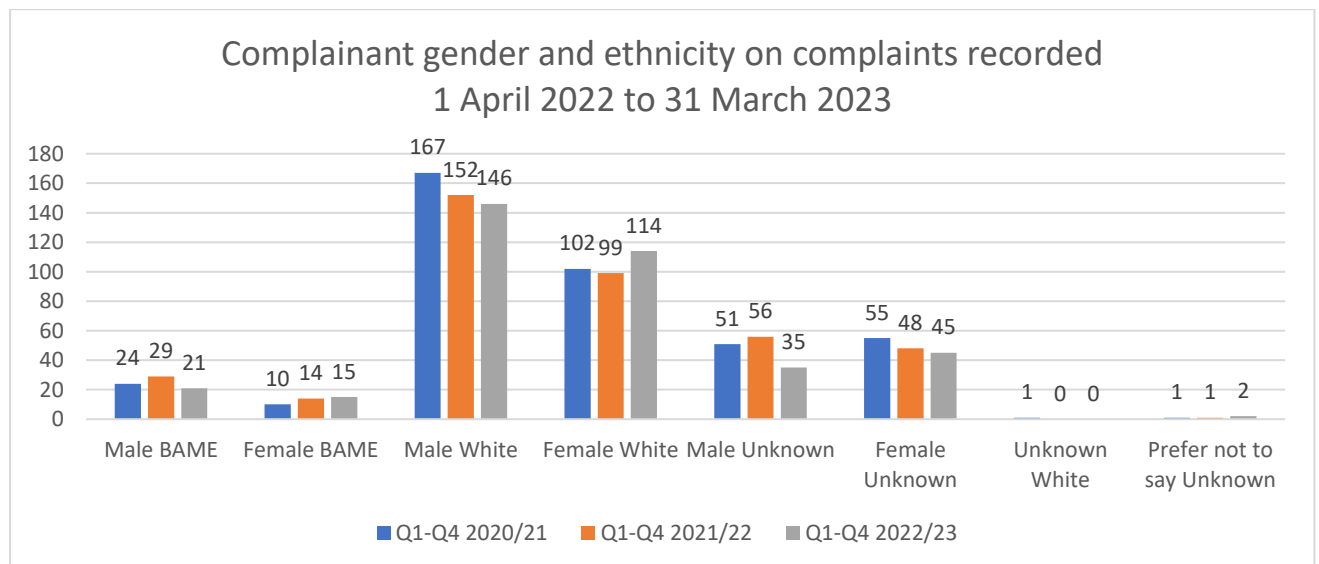
Complainant demographic

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 2022 to 31 March 2023, 362 complaint cases were received. A total of 378 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 78.3% of cases. This is an increase from 73.7% of complainants providing their ethnicity in 2021/22 and also in 2020/21.

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

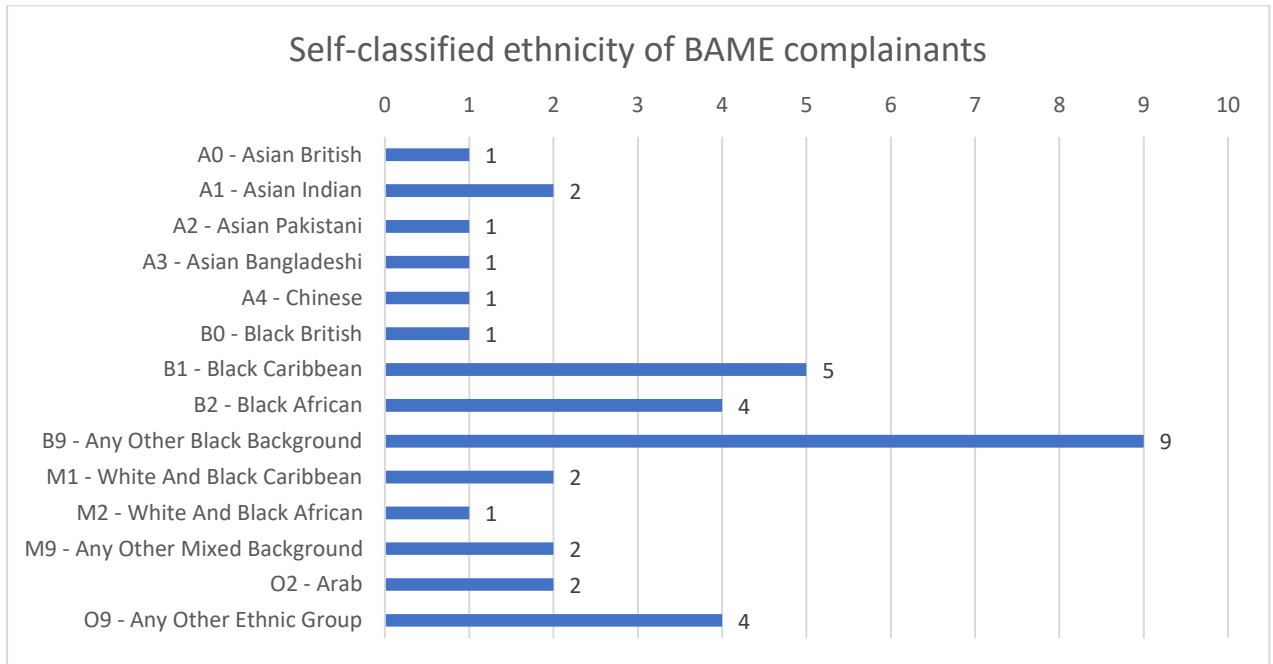


Complaints made by Black, Asian and Minority Ethnic

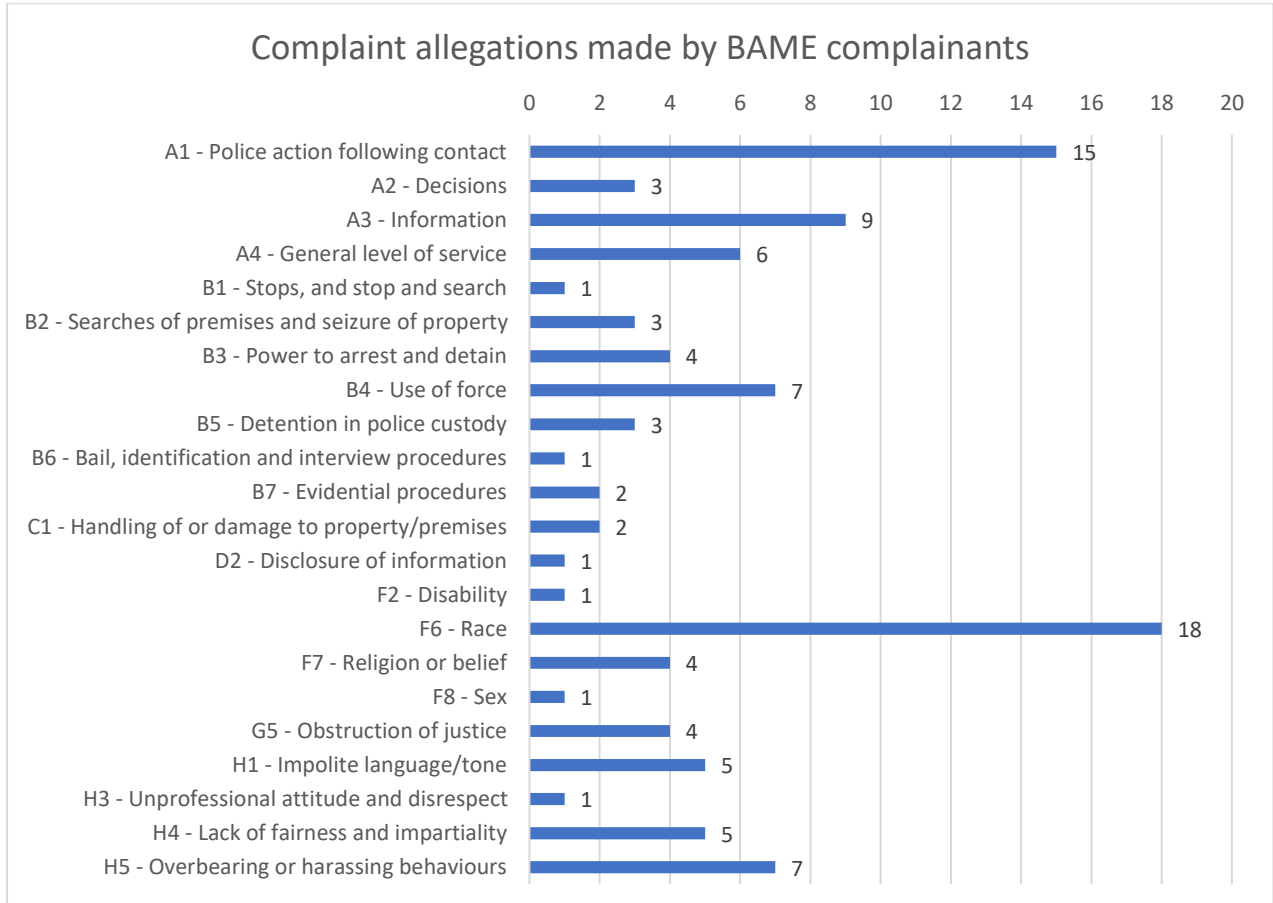
Of the 362 complainants recorded on the cases, 36 have advised PSD they are Black, Asian and Minority Ethnic (BAME). This is 9.5% of all complainants recorded.

This compares to 43 complainants from BAME backgrounds in 2021/22, which was 10.8% of the 399 complainants recorded and 34 complainants in 2020/21, which was 8.3% of the 411 recorded.

(Chart 14): The chart below details the self-classified ethnicity of the 36 BAME complainants:



(Chart 15): The 36 complainants from BAME backgrounds have made 103 separate complaint allegations in the reporting period and these are broken down into the following sub-categories:



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The largest number of complaints have been made in relation to discrimination on the grounds of Race, this is followed by Police action following contact and Information.

Examples of the complaints recorded between 1 April 2022 and 31 March 2023, under the top 5 sub-categories are detailed as follows:

- **Race** – the complainant was subject of a vehicle stop and ordered to perform a drug test which was negative. They believe this is harassment based on their race.
- **Police action following contact** – the complainant called the police however when officers attended, they went to see the perpetrator before the complainant. They state officers acted unlawfully and failed to follow the Victims Code.
- **Information** – the complainant states there was a lack of contact and updates from officers in relation to reported crimes.
- **Use of force** – officers arrested the complainant and it is alleged they used excessive force resulting in the complainant being taken to the ground and a spit hood being applied.
- **Overbearing or harassing behaviours** – the complainant attended the police station voluntarily and states the officer refused to let them leave even though they were not under arrest or being detained.

Discrimination complaints

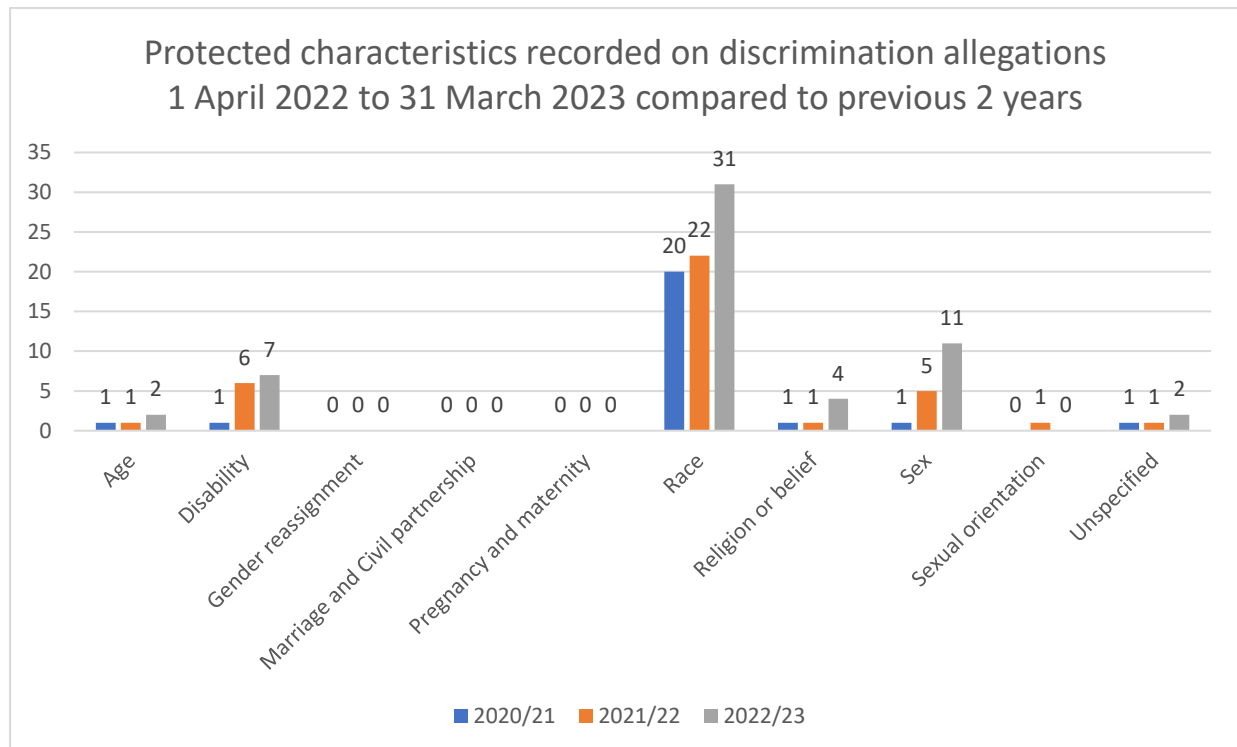
In the reporting period 1 April 2022 to 31 March 2023, the Professional Standards Department recorded 1,111 complaint allegations under new Regulations. Of this total, 57 allegations were recorded alleging discrimination which is 5.1% of the total.

To compare this to the year 2021/22, 37 allegations of discrimination were recorded which was 3.7% of the total 990 new Regulation allegations recorded.

In 2020/21, 25 allegations of discrimination were recorded which is 3.1% of the 795 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 16): The chart below shows the protected characteristics recorded on allegations received in the reporting period, compared the previous years, 2021/22 and 2020/21:



The chart above shows there has been a year-on-year increase in allegations made of discrimination on the grounds of race.

Of the 57 allegations recorded, 31 were made under the protected characteristic of race, which is 54.4% of all discrimination allegations. Complainants feel the service they received was not acceptable, or they were treated less-favourably, due to their ethnicity.

Of the 31 allegations recorded:

- 52% relate to an investigation, believing they have been treated differently or less-favourably during the investigation or that the arrest was made due to their ethnicity.

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- 35% relate to the pro-active use of police powers, i.e. traffic stops where the complainant believes that the stop was motivated by race, where the complainant was subject to excessive stops, where an inappropriate comment made or where the officer made an assumption about the complainant's ethnicity.
- The remaining complaints relate to interaction with police when responding to a neighbour incident, checking bail conductions, treatment in custody and the response by call handlers.

Of the complaints recorded as discrimination on the grounds of race, 19 have been finalised:

- 12 were determined as the service provided was acceptable
- 3 were determined that the service provided was not acceptable resulting in an apology to the complainant and learning for the officers
- 1 not determined if the service was acceptable
- 1 was resolved outside of Schedule 3
- 1 was withdrawn after the conclusion of the criminal investigation
- 1 resulted in no further action being taken as the complaint had been responded to in a reasonable and proportionate way

Of the remaining 26 allegations, 11 have been recorded under the protected characteristic of Sex. Of the allegations, 10 have been made by male complainants and they believe they have been treated differently due to their gender or not taken seriously. The one complaint made by a female states she was treated less favourably by male officers because she is a female victim.

Seven allegations of discrimination under the protected characteristic of disability have been recorded in the reporting period. Complainants believe officers have not considered their disability, not made reasonable adjustments or have taken advantage of/exploited their disability.

Police officers and staff subject of complaint

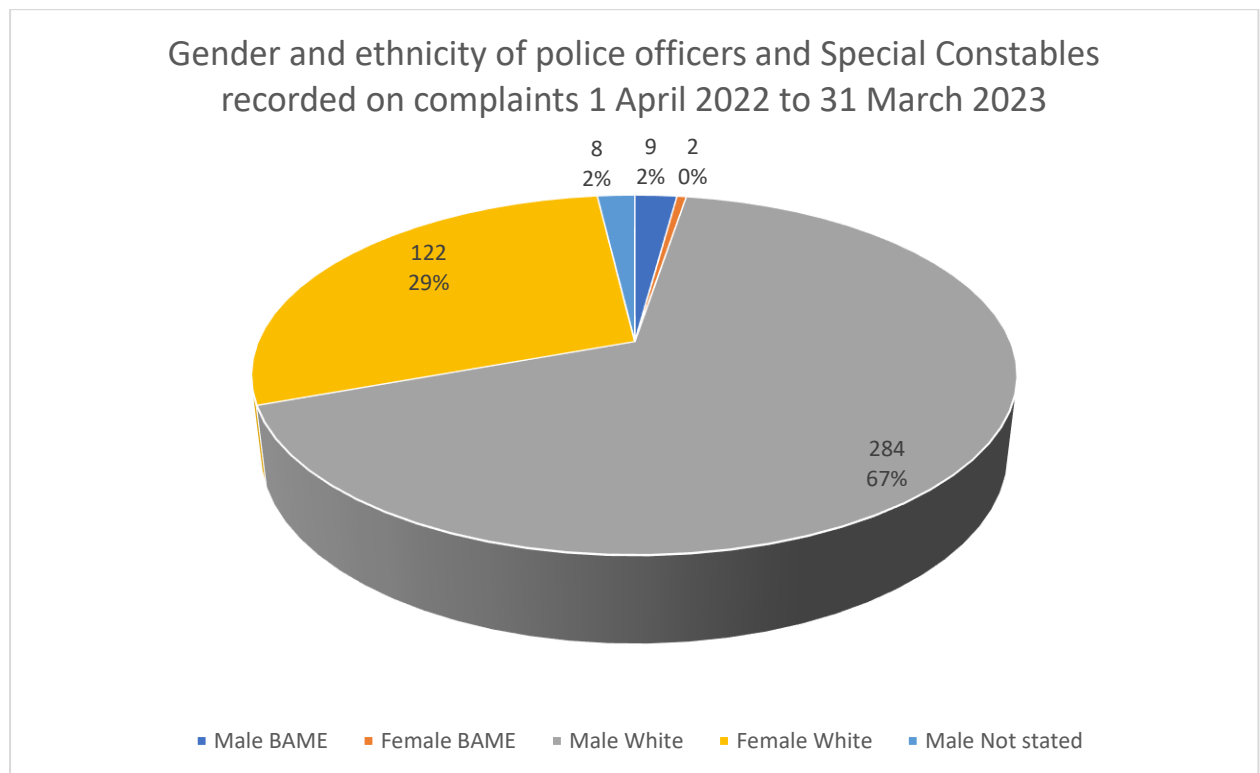
The 362 complaints received in the reporting period have been made against 735 Suffolk police officers, Special Constables and members of police staff (subjects).

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 462 individual officers and staff¹ have been identified on the 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 17): Of the identified subjects 425 are Suffolk police officers and Special Constables and details of their gender and ethnicity are shown in the chart below:



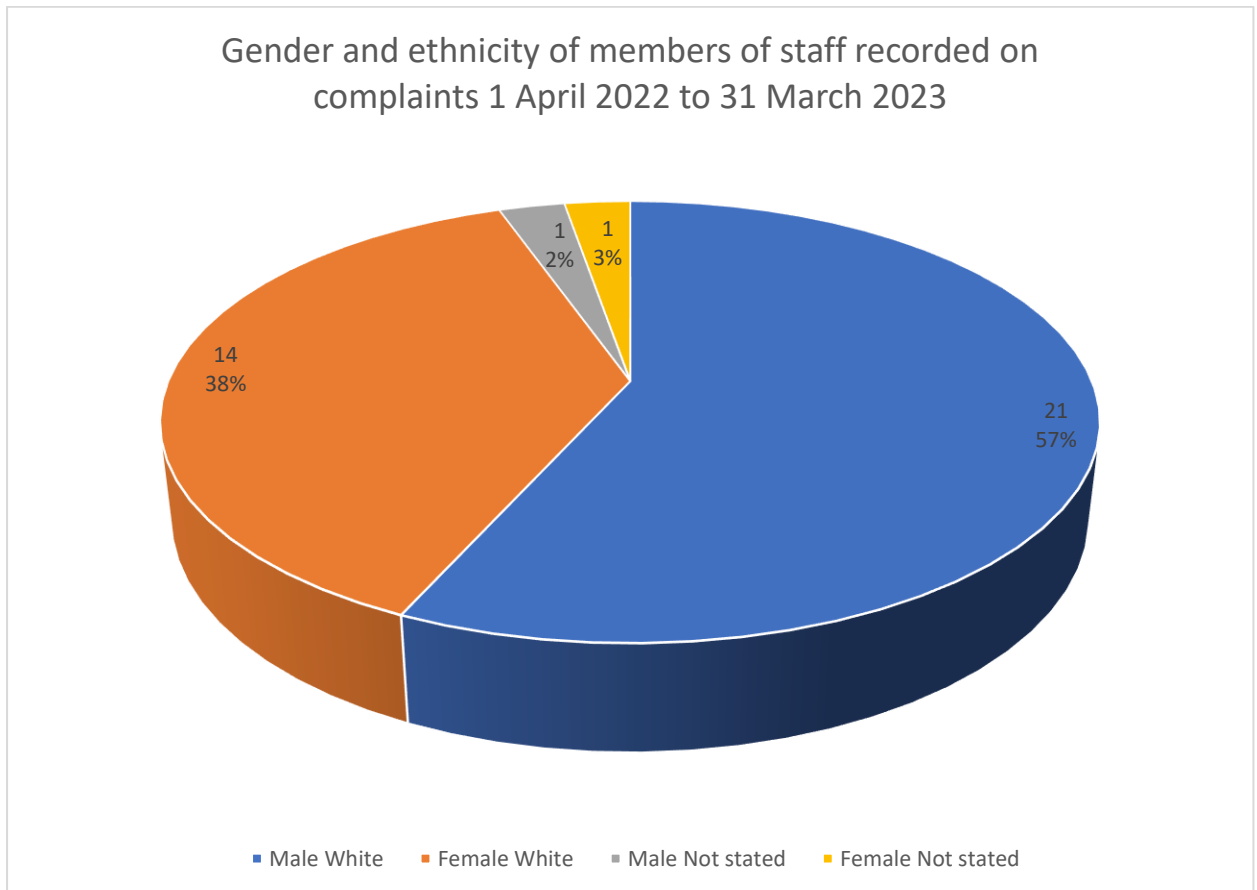
Of the 425 identified officers, 2.6% are BAME, 95.5% are White and 1.9% are unknown/not stated.

Suffolk workforce figures show that 2.5% of police officers are BAME, 96.3% are White and 1.3% have not stated their ethnicity.

¹ Individual 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 18): Of the identified subjects, 37 are members of police staff and details of their gender and ethnicity are shown in the chart below:



Organisational learning

Identifying and implementing organisational and individual learning is essential for any organisation to grow and develop. Suffolk Constabulary works closely with the Independent Office for Police Conduct (IOPC) and OPCC to identify opportunities to learn through the complaint and review process. The Service Improvement Team within the Professional Standards department (PSD) share the learning and seek to implement processes to prevent similar occurrences in the future.

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

1. The Professional Standards department have identified a number of cases whereby officers and staff are over claiming expenses. In the majority of cases this has been an error of judgement rather than a deliberate act of malice. However, it has revealed a lack of knowledge and clear guidance surrounding claims and officer entitlements. In order to educate officers and staff, the finance department were asked to provide clear guidance. This guidance was then shared to all staff and reinforced in the learning times publication. PSD have also asked supervisors to be more diligent and provide greater scrutiny when signing off expense claims.
2. Inappropriate personal relationships involving Officers and staff has the potential to cause significant issues for the organisation, it also has the potential to reduce public confidence in the Police service. Therefore, to address concerns raised during a recent misconduct investigation, guidance has been created and circulated to advise all staff on how to behave professionally in the workplace. It also provides advice to line managers on challenging inappropriate behaviours or relationship. It includes steps to be taken to minimise the impact on the individuals, the organisation and public.
3. Suffolk Constabulary recently received a complaint from a parent regarding a stop and search of their child by Police officers. The circumstances of the stop and search were examined through the complaint process. It was deemed that the officers had acted professionally and that they held the requisite 'suspicion' required to complete the search lawfully. However, it was identified that the suspicion held by the officers was based on inaccurate information relayed to them by the control room. The officers based their suspicion on a description passed to them by the control room relating to an earlier incident. That description was wrong which led to the mistaken suspicion by the officers. The stop and search had a negative impact on the child and his family. Suffolk Constabulary have apologised for this mistake and have taken steps to prevent this reoccurring. The importance of recording and providing accurate information to Officers has been reiterated to Control room staff. This case has been highlighted to show the effect poor communication can have on public confidence.

PSD are continuing to train all Sergeants and Inspectors in complaint handling. The training focuses on how best to address the concerns of the public and provide a reasonable and proportionate response to issues or concerns raised. We are asking supervisors to acknowledge when something has gone wrong and to identify learning where possible. This approach has led to a slight increase in the number of complaint cases where an outcome of 'service not acceptable' has been recorded. However, we feel this approach is necessary to grow and learn as an organisation. We continue to encourage the use of reflective practice to address instances where officers and staff could have behaved differently.

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PSD frequently record complaints relating to investigations, most commonly relating to officer updates to victims and witnesses. A 'learning times' article relating to Victims Code of Practice (VCoP) as well as officer obligations under the crime recording standards was published, to bridge any knowledge gaps. This has also been addressed individually with officers by their line managers.

Complaint training

Since the introduction of the complaint reforms in February 2020 we are aware that there is a knowledge gap for Sergeants and Inspectors across Suffolk. To address this concern, we have devised numerous tailored training packages. Presentations have been delivered to new supervisors as part of the STRIPES course to aid development and ensure a consistent approach to complaint handling. To date we have trained approximately 50 new Suffolk sergeants.

Mini masterclasses on complaint handling have been delivered to individuals and small groups, this has been arranged by PSD initially training officers where a training need was identified. However, following positive feedback from the participants we have increased our training capacity and aim to deliver the training to all sergeants and Inspectors in Suffolk over the next year. We are hopeful that with an increased knowledge of the complaints system, we will be able to reduce the amount of time taken to investigate complaints and ensure a better service for our service users.

PSD also delivered a compressed version of the complaint handling training to all of Suffolk's sergeants and inspectors through the recent 'PEEL' training. This input also included guidance on the code of ethics, standards of professional behaviour and abuse of position for sexual purpose.

The PSD intranet pages are in the process of being updated to include a help section. This will include a fictitious case study guiding officers through the complaint process, demonstrating best practice and giving guidance. These pages will serve as a help to officers dealing with complaints out of normal office hours. As with all training packages and publications officers are encouraged to contact PSD to discuss any questions or concerns they may have regarding the management of complaints.

The learning times monthly publication section entitled 'INSIGHTS' is specifically aimed at complaint handlers providing hints and tips and highlighting best practice.

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.

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 (the Office of the Police and Crime Commissioner) and the outcome letter to the complainant will advise them who the relevant review body is.

IOPC (Independent Office of Police Conduct) reviews

In the 12-month reporting period the IOPC received 30 requests to review the outcome of the complaint and of those, 16 were concluded within the reporting period.

The IOPC determined on 25 reviews in the reporting period (includes reviews received prior to the reporting period) and of those:

- 12 were determined as the outcome was reasonable and proportionate
- 12 were determined as the outcome was not reasonable and proportionate
- 1 was withdrawn

Of the 12 cases upheld by the IOPC:

- In seven cases the IOPC determined that the complaints should be investigated/re-investigated/address concerns in a reasonable and proportionate manner. In one case this has been concluded and the complainant provided with a further right to request a review. In the remaining 6 cases the investigations are continuing.
- Five cases resulted in recommendations by the IOPC in relation to the Force taking action to remedy the dissatisfaction and apologise to the complainants and additional learning. In one case the IOPC recommended the officer be referred to the Reflective Practice Review Process and this has been completed.

Local Policing Body (PCC) reviews

In the period, 1 April 2022 to 31 March 2023, the Local Policing Body concluded 43 reviews, (includes reviews received prior to the reporting period) and of those:

- 27 the police complaint outcome was reasonable and proportionate;
- 6 the police complaint outcome was not reasonable and proportionate;
- 6 were passed to the IOPC as the appropriate review body;
- 4 were withdrawn by the complainant.

In the six cases which were upheld (i.e. considered not reasonable and proportionate) all resulted in recommendations being made by the OPCC in relation to learning, reviews of process and policy and amending the outcomes to show the service provided was not acceptable or that it was not determined if the service provided was acceptable.

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. There is a requirement to provide a response every 6 months following the 12-month anniversary until the investigation is finalised.

In the reporting period, 1 April 2022 to 31 March 2023, 11 Chapter 13 reports have been sent. Seven relate to complaint cases and four relate to conduct cases.

Of the seven complaint cases, three are currently suspended due to the matter being sub judice. Three complaint cases are no longer suspended but spent between 6 and 12 months under this process. The remaining case was not suspended and is now finalised.

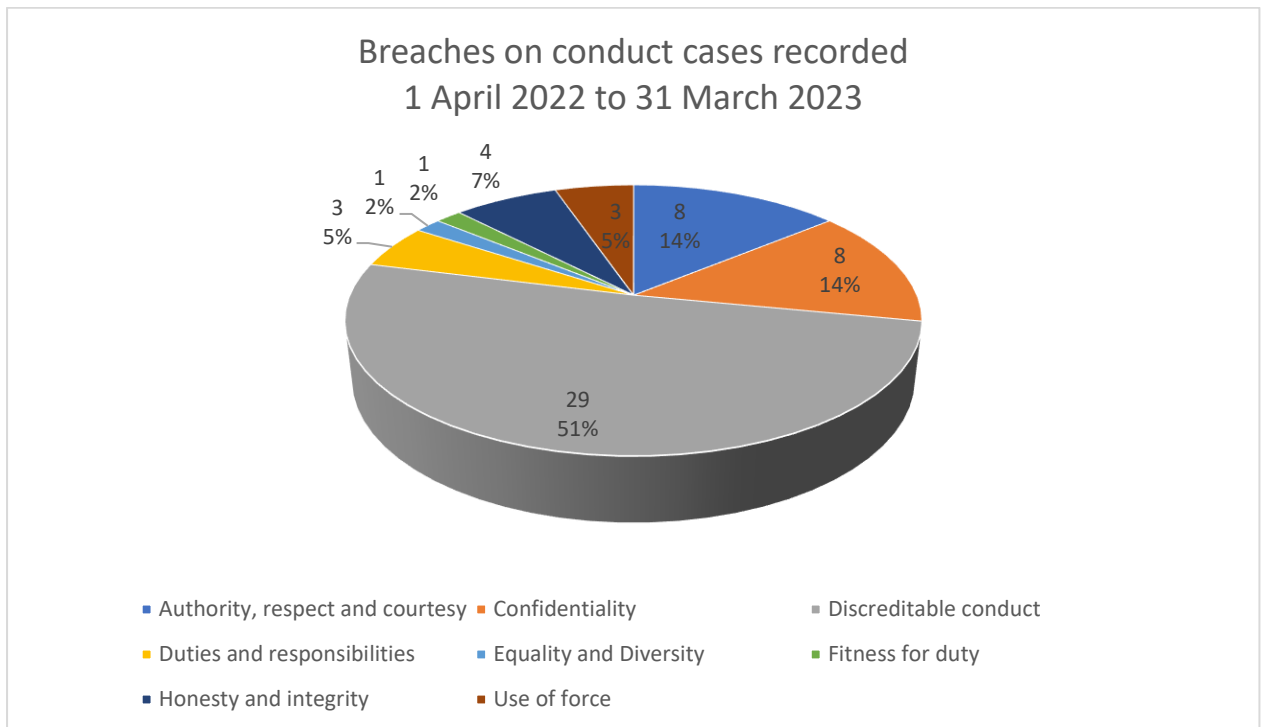
The investigation of the complaint cannot take place whilst the case is suspended and the therefore the timeliness of cases can be impacted by delays in the court process.

Internal Investigations

In the reporting period, 1 April 2022 to 31 March 2023, 52 internal conduct cases were recorded. This is an increase of 33% compared to the previous year when 39 conduct cases were recorded.

A total of 57 separate breaches of the Standards of Professional Behaviour have been recorded on the 52 conduct cases. These breaches relate to 74 Police officers, 9 members of Police staff and 4 members of the Special Constabulary.

(Chart 19): 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 50.9% of the total recorded. This was followed by 'Authority, respect and courtesy' and 'Confidentiality' both at 14% of the total recorded.

Examples of some of the breaches recorded are as follows:

- Allegation the officer committed traffic offences whilst travelling to work
 - *Referral to the Reflective Practice Review Process*
- Allegation the member of staff committed domestic abuse offences
 - *Live investigation*
- Allegation the officer committed a criminal offence
 - *Referred to a misconduct hearing where the officer would have been dismissed had they not resigned*
- Allegation the content of the officers' WhatsApp messages was unprofessional and discourteous

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- *Referred to the Reflective Practice Review Process*
- Allegation the officer engaged in behaviour towards a colleague which caused them to feel harassed and uncomfortable
 - *Referred to a misconduct meeting resulting in referral to the Reflective Practice Review Process*
- Allegation the officer has shared information from police systems
 - *Referral to the Reflective Practice Review Process*
- Allegation the officer has accessed Force systems for a non-policing purpose
 - *Live investigation*

Of the conduct cases recorded in the reporting period, 22 have been finalised to date:

- 3 cases resulted in the matters being referred to proceedings
- 11 cases resulted in the officers being referred to the Reflective Practice Review Process
- 3 cases resulted in Learning from reflection
- 5 cases resulted in no action

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Misconduct outcomes

(Table 8): 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		
	Nature of Offence	Outcome
1	A police officer attended a misconduct hearing for Discreditable conduct Theft of property	Dismissed
2	A misconduct hearing was held for a former member of police staff for Discreditable conduct Conviction for driving a motor vehicle with a proportion of a specified controlled drug above the specified limit	Would have been dismissed had they not resigned
3	An accelerated misconduct hearing was held for a former officer for Discreditable conduct Conviction for driving with excess alcohol	Would have been dismissed had they not resigned
4	A police officer attended a misconduct hearing for Discreditable conduct. Purchase of an illegal firearm	Written warning
5	An accelerated misconduct hearing was held for a former police officer for Discreditable conduct Suspect in criminal investigation	Would have been dismissed had they not resigned
6	A misconduct hearing was held for a former officer in relation to two cases of Discreditable conduct Inappropriate contact with vulnerable persons	Would have been dismissed had they not resigned
7	A member of police staff attended a misconduct hearing for Discreditable conduct and Fitness for duty Conviction for driving with excess alcohol	Dismissed
8	A police officer attended a misconduct hearing for Authority, respect and courtesy Inappropriate behaviour towards police colleagues	Final Written Warning
MISCONDUCT MEETINGS		
1	A member of police staff attended a misconduct meeting for Orders and instructions	Written warning

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	Drove an unmarked police vehicle not in accordance with Force policy.	
2	<p>A police officer attended a misconduct meeting for Authority, respect and courtesy</p> <p>Inappropriate behaviour towards a colleague</p>	<p>Referral to Reflective Practice Review Process</p>

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 three police officers resigned whilst under investigation. Two resulted in a misconduct hearings for the former officers and in the other case the investigation is ongoing.

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.

Six misconduct hearings for police officers were held during the reporting period, three were in public and three held in private.

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 by Suffolk Constabulary, the OPCC has completed Dip Sampling from the finalised cases provided by the Constabulary's Professional Standards Department (PSD) for the periods of 1 July 2022 to 30 September 2022 and 1 October 2022 to 31 December 2022.

A total of 16 files were subject to Dip Sampling with all complaints being 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 where the level of service was judged to be acceptable and not acceptable). Consideration was also given to files where it was decided to record the complaint and take no further action as well as complaints that were withdrawn.

Overall, the files sampled were completed to the expected standard with processes and procedures followed. There were positive examples of appropriate learning being identified as well as positive engagement with complainants.

There were positive examples of detailed final written reports being provided which responded to all the issues raised within the complaint. PSD also provided examples of where learning identified within the complaints process has led to changes in procedure being implemented to improve the service moving forwards.

This Dip Sample highlighted a few areas of improvement that have been discussed with the Suffolk Constabulary Professional Standard Department (PSD). These issues included:

- Delay in complaint assessment.
- Delay in complaint allocation. (A new process has already been implemented around monitoring allocated complaints so this can be managed against operational workload).
- Delay in complaint progression.
- Delay in final documents being sent to complainant from PSD

In conclusion, whilst there have been some issues highlighted 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. It is clear Suffolk Constabulary continue to strive for improvements within this process even in view of other challenges being faced.

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 – 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 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.

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

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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

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	Delivery of duties and service A1 Police action following contact A2 Decisions A3 Information A4 General level of service
B	Police powers, policies and procedures 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
C	Handling of or damage to property/premises
D	Access and/or disclosure of information D1 Use of police systems D2 Disclosure of information D3 Handling of information D4 Accessing and handling of information from other sources
E	Use of police vehicles
F	Discriminatory behaviour 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

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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](#)
policeconduct.gov.uk