

# Independent Scrutiny of Police Complaints Panel

June 2024

# Contents

Page 3 | **Purpose of the Independent Scrutiny of Police Complaints Panel**

Page 3 | **Structure of the Session**

Page 4 | **Presentation – Avon and Somerset Constabulary: VAWG**

Page 5 | **Professional Standards Department update & comments**

Page 6 | **Actions**

Page 7 | **Statistical Analysis**

Page 7 | **Examples of positive feedback**

Page 8 - 13 | **Highlights of Concerns, Questions or Issues raised by the Panel**

Page 14 | **Further Information & Get in Touch**

# Purpose of the Independent Scrutiny of Police Complaints Panel

The Independent Scrutiny of Police Complaints Panel (ISPCP) consists of 11 independent panel members who are all volunteers representing the communities of Avon and Somerset. Their aim is:

***‘To act as a ‘critical friend’ to the Police and Crime Commissioner (PCC) and to Avon and Somerset Constabulary by providing feedback on completed complaint files to the office of the PCC and to the Constabulary’s Professional Standards Department (PSD). The Independent Scrutiny of Police Complaints Panel (ISPCP) will review complaints against the police from a local citizen’s viewpoint.’***

Further information can be found [on our website](#).



## MEETING ATTENDANCE:

Attendees: AD, BK, EK, PR, SB, LC

Apologies: JS-G, JF-T, JB, KS, TW

## STRUCTURE OF THE SESSION

6 panel members attended this quarter each panel member worked independently to scrutinise their own complaint cases. This enabled the panel to review a higher number of complaint files.

The Panel opted to focus their meeting on the theme of complaints relating to Violence Against Women and Girls. Violence against women and girls (VAWG) is an umbrella term used to cover a wide range of abuse types that affect more women and girls than men and boys. These include domestic homicide, domestic abuse, sexual assault, abuse experienced as a child, female genital mutilation (FGM), forced marriage and harassment in work and public life.

The panel re-elected their same chair and reaffirmed the deputy chair for a further year, taking both positions until June 2025.

Since the last ISPCP meeting a new **Police & Crime Commissioner for Avon and Somerset** has been elected, **Clare Moody**. Clare joined the panel briefly, introduced herself and thanked the volunteers for their dedication and hard work during National Volunteers Week. One of Clare’s first objectives will be to draft and publish her Police & Crime Plan, she emphasised that VAWG will be a major focus of this.

A total number of 27 completed complaint case files were reviewed in detail by the panel prior to the meeting. These cases were discussed in depth verbally with Chief Inspector Sharon Baker, Inspector Louise Pressly and Admin Manager Owain Taylor from ASC’s PSD. The panel welcomed a presentation from Superintendent Jane Wigmore regarding the work Avon and Somerset Constabulary are doing to tackle VAWG.

## Presentation – Violence Against Women & Girls, ASC - Superintendent Jane Wigmore

In December 2021, the National Police Chiefs' Council (NPCC) published the first [national framework](#) for the delivery focused on what policing could do immediately to tackle VAWG. This prioritised three pillars of activity:

- Building Trust and Confidence
- Relentless Perpetrator Pursuit
- Safer Spaces

ASC, along with other forces then developed their own plans to improve their response to VAWG.

In March 2023 the NPCC published the first annual VAWG strategic threat and risk assessment (STRA) and committed to developing a 4P approach within the delivery framework. A 4P approach is a tested methodology that was developed in counter-terrorism:

1. Protect
2. Pursue
3. Prevent
4. Prepare

This new plan clearly states what the Constabulary must do to tackle crimes that adversely affect women and girls. It also demonstrates that policing alone can't tackle VAWG.

In spring 2023, the Home Secretary announced Violence Against Women and Girls

as a national threat and included it within the strategic policing requirement (SPR) alongside terrorism, serious and organised crime and child sexual abuse.

A&S has a nominated pillar lead, responsible for leading continuous improvement activity in relation to each pillar and progressing priorities set against the national delivery plan.

These pillars are led by Supt Wigmore as the force lead for VAWG under the Chief Officer Group lead, Assistant Chief Constable Jo Hall.

There are many aspects to the work that is being undertaken by ASC but this includes; VAWG tactical meetings, bringing together pillar leads, the core delivery team and relevant stakeholders that drive the delivery plan.

A Safer Spaces tactical delivery group who meet quarterly chaired by the lead of Pillar 3, bringing together key stakeholders to monitor and progress activity.

A local performance framework and a bespoke VAWG Qlik app monitors performance and drives improvements through the VAWG tactical group and the Vulnerability and VAWG working group.

Under each of the 3 pillars an extensive amount of work is being done in each area and Supt Wigmore highlighted this. Supt Wigmore emphasised the importance of focusing the panel's scrutiny activity on complaints of Domestic Abuse, Child Sexual Exploitation/Abuse, Rape & Serious Sexual Offences and Cyber Crime, as the voices and experience of our panel community members can really help to inform improvement activity.



## PROFESSIONAL STANDARDS DEPARTMENT (PSD) UPDATE

Chief Inspector Sharon Baker

### NEW FEEDBACK SYSTEM

The panel have regularly identified issues with the grammar, spelling and tone of correspondence that is being sent out by PSD and police departments directly to complainants. In an effort to improve this, the OPCC and PSD are now working together to create a new feedback system. This system, will identify cases where the panel have provided both negative and positive feedback in relation to particular named individuals. PSD will then take this feedback forward to action, sharing it with the relevant individuals and offering guidance and further training where necessary.

**Comments from C/I Baker:** *'It was a pleasure to have attended the meeting in June, and to have met some of the new members. The Panel was also able to welcome the new PCC, Clare Moody, who attended the start of the meeting and spoke about the importance and value of the work that the scrutiny panel undertake. I have no doubt you will see the PCC at future meetings to share your on-going work. The theme for the Panel in June was VAWG. We all recognise the importance and relevance of this theme to present day policing and public confidence. The first pillar of the VAWG strategy is public trust and confidence. The Panel plays a critical part in this, providing public scrutiny. You are integral to that confidence.*

*Chief Superintendent Jane Wigmore is the force tactical lead on VAWG and provided a valuable input to the meeting, with an update on the progress being made in this area. She spoke about the 3 strategic pillars, the other two being the relentless pursuit of perpetrators and safer spaces. There was an emphasis on streamlining our work to focus on the core areas of concern.*

*As part of this work, I am delighted to provide the update, that as of June 2024, 20 Sexual Misconduct Advocates are in place working alongside the Sexual Misconduct Liaison Officer, to provide fully trained peers to give advice and support to any staff who has witnessed or are victims of sexual misconduct or abuse. Avon and Somerset is the first police force to establish such a scheme.*

*The Panel did also highlight their on-going concerns around the quality of our communications, in particular the standard of grammar and spelling and format of the final complaint letters. I want to reassure you we take your feedback seriously and continue to look at ways to improve. Owain Taylor, our admin manager, who attended the meeting and listened to your concerns, continues to work hard on improving our methods of communication. While we also continue the roll out of our PSD workshops to improve the quality of complaint handling.*

*Once again, I'd like to thank all the ISPCP members for your time and valuable feedback. You continue to help us provide the best possible service to the public.'*

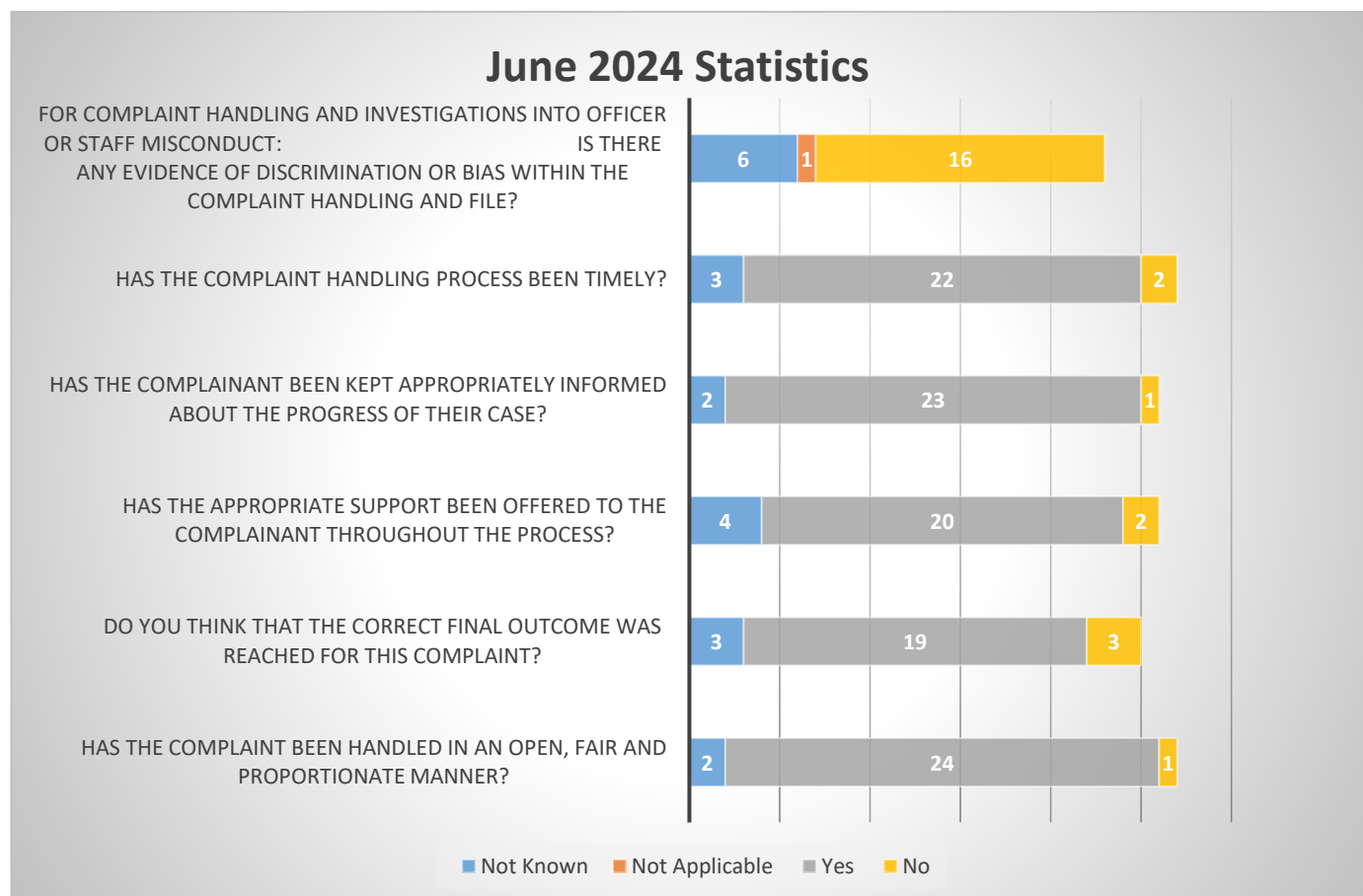


## ACTIONS

This section logs ongoing actions requested by the Panel and forms part of their ongoing work to scrutinise police complaint handling.

No	Date	Action (OPCC, ASC, Panel)	Progress update	Completed Ongoing/KIV
1	March 2021	Inclusion & Diversity training for all panel members. (OPCC)	The Equality and Diversity E-learning package regarding the Equality Act Training has been circulated 28/09/23. The ASC Inclusion & Diversity Team run information sessions about Race (Safe spaces) and Demystifying Islam (and Ramadan).	KIV
2	Sept 2022	PSD to update the panel following Learning Meetings & provide a briefing on any recent complaint statistics of interest including the IOPC quarterly bulletins and annual complaints report. (ASC)	To continue to discuss points of interest at future meetings.	KIV
3	Feb 23	Schedule 3 advice issue to be monitored. (Panel)	Complainants can request that their complaint is recorded under Schedule 3. It was noted in one case by the panel that in the final paragraph of the finalisation email the wording is that, whilst the Complainant has the option of having the complaint formally recorded under Schedule 3 of the Police Report Act 2003, the 'outcome will remain the same'. It was agreed that this statement should be avoided as complainants could be dissuaded from exercising their right to have their complaint recorded.	KIV
5	Mar 24	Identifying Disproportionality in the Criminal Justice system. (Panel)	Recommendation 9 – examination of all Stop & Search Complaints to be examined.	KIV

## STATISTICAL ANALYSIS



This chart related to the six questions in the feedback form, 34 cases were sampled. Panel members record 'not known' when the case file does not give sufficient detail to allow a categorical yes or no answer

## EXAMPLES OF POSITIVE FEEDBACK

*"There was clear concern by the person dealing with this complaint for the victim's welfare and this was expressed in communications with them checking that they had support and were in contact with relevant agencies. The complainant had moved to Yorkshire but did not want to be interviewed by Manchester police regarding the assault but wanted any arrangements to be initiated Avon and Somerset Police only. The complaints handler was very happy to comply with this request and proceeded to action this promptly"*

*"Investigating Officer spoke with complainant, who said she had new evidence, he requested this be sent to him so that it can be investigated. Final letter sympathetic, acknowledging that for part 1 of the complaint this may not be the outcome the complainant desires"*

*"Relevant legislation, available videos, BWV, meeting with involved police personnel and applicable reports were reviewed (as detailed in the final complaint correspondence) evidencing a robust investigation was carried out. The outcomes were clearly presented to the complainant in that the final complaint letter was written in a format that broke down each element of the complaint and the language used was jargon free. Response times from when the complaint was first submitted to its conclusion were within prescribed timescales"*

# HIGHLIGHTS OF CONCERNS, QUESTIONS OR ISSUES RAISED BY THE PANEL

Panel Member Feedback	PSD Response
<p><b><u>AD/2 - Complaint Summary (VAWG)</u></b> The complainant alleges that on 15 March 2022 she went to Patchway Police Centre to report that her ex-partner had threatened her. She spoke with a male police officer who advised her to take out a non-molestation order. She has now asked for disclosure of all previous incidents reported to the police for the Family Court and there is no record of this being recorded by the police.</p> <p><b><u>Panel Member Feedback</u></b> <b><i>The complainant stated they used the external phone system, to which an officer from within the building came out to speak. Is there a use log kept for the external phone?</i></b> <b><i>What systems/procedures are in place, or can be implemented to avoid a similar situation happening again?</i></b></p>	<p><i>Comms complaints coordinator consulted and provided the below response:</i> <i>'There isn't a specific log for these apart from the calls being recorded on the communications telephony recording system (along with all the other calls). They connect straight to the call-handlers in the control room, and they will call a station to locate someone or request a dispatcher (radio operator) makes a call over the radio for an officer to go and speak to the person on the phone. If just managed by switchboard no logs would be created to describe the call. The only record is on the telephony system which would give time and date a call was made and from which phone (not all external phones connect or record in the same way either, it will be dependent on location).'</i> <i>Searching this system is a lengthy process and would probably not be deemed proportionate for an OTBI.</i></p>
<p><b><u>SB/1- Complaint Summary (VAWG)</u></b> Complainant runs a safe house for women and children – she receives a call that a male has accessed the property and is holding a weapon.</p>	



## Panel Member Feedback

## PSD Response

Complainant attends property at same time as officers – there is indeed a male on the premises who then leaves. Complainant complains that officers did not search him and essentially said that there was little they could do.

### **Panel Member Feedback:**

***The decision on the stop and search element of the complaint.***

***I am concerned that the complaint investigator agreed with the attending officers that they could not search the male because they needed “a direct witness or CCTV” and that the male was at a “residential dwelling”. I would question this because: 1. This was not just a residential dwelling but a registered safe house which would carry a much higher safety risk 2. The male was not authorised to be in the safe house 3. There was intelligence from the 999 call that the male had a weapon. Given this combination of circumstances, it is at least arguable that there was an objective basis for reasonable suspicion in this case. I appreciate that there is an element of officer discretion, however, the response to the complaint suggests that the officers had no option to stop and search, whereas a number of sections of Code A of PACE would appear to apply, namely: 2.2 (objective basis), 2.4 (information and intelligence), and 2.6B (behaviour time and location).***

*I’ve asked our force lead on stop and search to review the case and she has given the below response:*

*‘I’ve had a look and completely agree with the below in relation to the residential dwelling part. There would have been grounds for search for a weapon if he was found in a public place, but he was located in a dwelling – so no powers under s.1 PACE to search. This is the right decision on the part of the officers.*

*I disagree with the needing a direct witness or CCTV part – I’m usually all for more is better when it comes to grounds, but I would have been happy to search (if in a public place) on the information in the log. I don’t fall out with the panel’s comments, it’s just a non-starter as we couldn’t have legally searched him where we found him.’*

### **JB/2 - Complaint Summary (VAWG)**

Complainant states that the service received from LSU (Lighthouse Safeguarding Team) was very poor in that the initial contact made by FN was late at night, by mobile with caller not leaving any contact details e.g. badge number, case reference number, defendant’s name, causing the complainant additional stress as unable to make further contact with FN. Complainant was not advised at any time that she could retract her statement.

## Panel Member Feedback

## PSD Response

### **Panel Member Feedback:**

*I believe the purpose of Lighthouse is to provide an enhanced service of support to the victim. This does not seem to have happened here.*

*I do not find the investigation outcomes written in a helpful or satisfactory manner.*

*The response from the investigating officer, Regional Manager Mr F, is very formal, and could give the impression of being dismissive of the issues raised.*

*Query whether the impact of the lack of communication over this period of time has been considered. I accept that responses were made within the allotted timescales, however the lack of communication/contact clearly increased the stress experienced by the complainant.*

*The final complaint email detailing the outcomes /actions could have been written in a more empathetic manner in recognising the position of the complainant to provide confidence that any learning outcomes in practices would be addressed through supervision and ongoing development.*

*What training is provided for complaint handling within the LSU?*

*Reviewing the emails I think it is acknowledged that the service provided by LSU was not good, but I agree it could have been communicated far better and more empathetically, and with a clear apology. This will of course be fed back to the author.*

*I agree with the comments on the final email to the complainant. This was written by one of the assessors. I will send this feedback to Owain Taylor our admin manager who manages the assessors. He has provided the below response: 'This is similar feedback as provided about copy and pasting responses from area. I do think that on occasions the force isn't 'at fault' we have a duty to inform complainants of that. But I agree we could have shown more empathy. This is something we will be working on with the overview of the final letters.'*

*We have recognised a lack of training for all staff who handle complaints and we have therefore been running an OTBI workshop through April and May for all supervisors across the organisation. We are emphasising the quality of the final letters and being free to apologise, if necessary, without apportioning blame.*

### **JS-G/2 – Complaint Summary (VAWG)**

The complainant alleges that they saw an officer opening their car door and looking around their car. When challenged the officer stated they were trying to ascertain the identity of the driver as they believed that the car had hit their car. The complainant alleges the officer presented as very angry and the behaviour scared them. The complainant considers this to have been an abuse of the officer's authority and considered their actions to be invasive.

### **Panel Member Feedback:**

*Would it be normal practice when investigating a complaint to not make contact with the complainant should inconsistencies in*

*Handlers of OTBIs have up until recently had no input, training, or advice on how to handle an OTBI complaint. No expectations have been set*

**Panel Member Feedback****PSD Response**

***accounts arise during the investigation? In this case the officer maintains he didn't present as angry and took efforts to not intimidate the complainant e.g. sitting in his car to not physically intimidate but I can see no evidence of this being further explored with the complainant.***

***If there has been a delay in a complaint being investigated, would there be an expectation for this to be acknowledged with the complainant, both during the deadline period, and again in the final outcome communication?***

*and it has been left to individual staff of varying knowledge and experience. They are trying to handle the complaint while prioritising operational issues, we acknowledge that it will often not be at the top of their list of priorities. There is guidance on OTBI handling on Pocketbook, however it tends to provide information on the processes involved rather than the nuances of dealing and communicating with complainants. There is a 30 minute video which advises on OTBI handling. There is no specific requirement to continue to go back to a complainant with officers' accounts, that would be at the discretion of the complaint handler.*

*We are aiming to rectify the previous lack of training on complaint handling, with fortnightly workshops on OTBIs for all supervisors. In these workshops we emphasise the importance of contact with the complainant, making sure they fully understand the complaint, being timely in contact and being prepared to apologise if necessary.*

**KS/3 - Summary of Complaint (VAWG)**

1. Complainant alleges discrimination on grounds of disability. Has been reporting crimes of cruelty against animals, which, due to a call handler diagnosing complainant with delusions, have not been taken seriously

2. Complainant alleges call handler diagnosed delusions which ruined her reputation

NPT Supervisor review (quoted on Indication Test) states that numerous reports of animal cruelty/theft by neighbours have been made by complainant, all followed up, nothing found. On last occasion 11/23, OIC made numerous attempts to contact complainant with no success, hence case closed.

**Panel Member Feedback:**

***Final letter does not acknowledge second part of complaint re call handler, other than to state that the service provided was***

**Panel Member Feedback****PSD Response**

***acceptable. In the complaint C states "Here is the note where a call handler chose to diagnose me..." suggesting that she has provided evidence to support her assertion.***

***Please can the second allegation referring to the call handler be addressed to see if there are in fact references to C's mental health recorded anywhere, and, if there are, the source of the information, and whether it has been used appropriately.***

***Without this knowledge, it is not possible to see how conclusion was reached that the service was acceptable for this part of the complaint. It forms the basis for the allegation of discrimination and her ongoing concern that her reports are not taken seriously as she is deemed "delusional".***

*I have looked at the storm log for this call, there is nothing on the log to suggest that the call handler was making any assumptions about the complainant's mental health. The complainant indicates this was done previously. Bearing in mind the issues have been on-going for at least 2 years and numerous calls made it is not proportionate to listen back to all calls/look at logs. I have done a name check on the complainant and can't find anything on our systems to indicate we have a care plan or specific record relating to their mental health. There are over 100 records for the complainant, so it is not proportionate to look back and see if assumptions were made about her mental health in any previous investigations or reports.*

*The complaint handler was an NPT Inspector who answered the allegations pertinent to NPT staff. It does not appear that the call handler or log in question was identified, this should have been communicated to the complainant. I have found no evidence of a note, this may be because it was not provided, but the complaint handler should have explored this, and made reference to it. Feedback will be provided to complaint handler.*

**JB/3 - Summary of Complaint (Discrimination)**

1 Complainant states that police don't take violence against transgender women seriously, in that if the incident had been related to cisfemales the officers would have handled the investigation differently.

This belief is compounded by officers waiting over a month to obtain CCTV footage of the incident from the hotel of the incident by which time the footage had been deleted.

2 Correspondence to the complainant was addressed not in accordance with the complainant's request further endorsing the complainant's belief that officers discriminate against transgender persons.

## Panel Member Feedback

## PSD Response

### **Feedback Panel Member 1:**

*It was noted that in the final complaint letter usage of the abbreviation PSD had been used without any text to amplify/provide meaning to the abbreviation.*

*It was noted that in correspondence dated 30/07/23 the complainant had highlighted that they wanted to be addressed as Ms. However, in the complaint summary letter 18/08/23 the complainant was addressed as Mr. this admin error was unacceptable.*

***What administration steps are taken to spell check correspondence sent to complainants?***

### **PR/3 - Summary of Complaint (Discrimination)**

This complaint is comprised of two component parts. In the first instance, the complainant alleges that the police kept hold of personal possessions, including his mobile phone after he was arrested, and not returned after his release.

The second allegation is a charge against the police of discrimination. He cites as an example of this a white woman who was arrested alongside him but had her personal effects returned to her many months earlier.

### **Feedback Panel Member 1:**

***Feedback, no direct question - It appears from the file that the complainant was released from prison around three to four months before any action was taken to return his personal property to him. This seems to be a rather long time for anyone to wait and I think the police complaints accept this as a genuine failure and valid criticism on their part. I think perhaps the way they worded the reasons for this could been better written to reflect a sincere apology, "operational pressures on the organisation" doesn't seem adequate!***

*There are no steps by admin to spell check the final letters, it is the responsibility of the individual complaint handler submitting the letter. We are emphasising this in our OTBI workshops. We also emphasise that they should avoid use of police acronyms and if they do use them, they should explain what they are.*

*The use of Mr to address the complainant is an admin error and we will feedback to the admin manager.*

*We can cover this in our OTBI workshops, we talk about not being afraid to apologise, but we could also mention, the importance of the wording and sounding sincere.*

# Further information about the Independent Scrutiny of Police Complaints Panel (ISPCP)

Further information about the ISPCP can be viewed through the following link:

[Independent Scrutiny of Police Complaints Panel | OPCC for Avon and Somerset \(avonandsomerset-pcc.gov.uk\)](https://www.avonandsomerset-pcc.gov.uk)

## Get in touch

Avon and Somerset Police and Crime Commissioner  
Avon and Somerset Police Headquarters  
Valley Road  
Portishead  
Bristol  
BS20 8JJ

[www.avonandsomerset-pcc.gov.uk](https://www.avonandsomerset-pcc.gov.uk)

Or you can contact the office by telephone on 01278 646188

You can find us on social media here:



[Facebook](#)



[X\(Twitter\)](#)



[LinkedIn](#)



[Instagram](#)



[YouTube](#)

**Rebecca Maye**

**Scrutiny & Assurance Manager**

**Office of the Avon & Somerset Police and Crime Commissioner**

[Rebecca.maye@avonandsomerset.police.uk](mailto:Rebecca.maye@avonandsomerset.police.uk)