

Independent Scrutiny of Police Complaints Panel

December 2024

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Purpose of the Independent Scrutiny of Police Complaints Panel

The Independent Scrutiny of Police Complaints Panel (ISPCP) consists of 11 independent panel members, as pictured below, 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](#).



Figure 1 – The Independent Scrutiny of Police Complaints Panel

STRUCTURE OF THE SESSION

4 panel members attended this quarter, and each panel member worked independently to scrutinise their own complaint cases. A total number of 24 completed complaint files were reviewed in detail by the panel prior to the meeting. The Panel opted to focus their meeting on the theme of complaints relating to Discrimination.

The cases scrutinised were discussed in depth verbally with HOPSD Larisa Hunt, Chief Inspector Sharon Baker and Inspector Louise Pressly from Avon and Somerset Constabulary’s PSD. The panel welcomed a presentation from Esther Wride, regarding the recent work of the Inclusion and Diversity Team.

Panel Attendees – KS (in-person), EK, LC, AD, (virtually)

Apologies - JS-G, TW, SB, BK, PR, JB.



ASC Outreach Team –

Esther Wride, Outreach Team Leader and Inclusion and Diversity Lead attended the ISPCP and delivered an update regarding the ongoing work and achievements of the Outreach Team.



Figure 2 – The Outreach Team - From left to right: Rizwan Ahmed, Halgan Dahir, Veron Dowdy, Eneyi Pemu, Abdulkadir Shekhusein, Paul Walker

The aim of the Outreach Team is to shape and promote the employment offering of ASC, to improve the diversity of applicants resulting in diverse talent pools. Further aims include, supporting and recruiting underrepresented groups to apply for roles in policing and raising awareness of opportunities available. Improving the perception and accessibility of careers within the police for communities and increasing community insight and engagement and overall to make a lasting, positive and progressive change within ASC.

The team carry out a great deal of external work. Including: Discovery Workshops which give an opportunity for people to join online and get a flavour of what policing is like. Pop Up Stalls at career events, Mosque Pop Up Stalls, Community Roadshows, In Conversation events and Post 16 schools are also visited as part of the team’s commitment to really encourage community and neighbourhood

engagement. There were over 20 visits in 2023. Neighbourhood Policing Team and Outreach coffee mornings are offered, creating a safe space where people can talk to the team in a supportive environment.

Internally the team offer a variety of services. Including: Safe Spaces, 21 sessions were run in 2023 with nearly 600 staff attending. Sessions are offered to educate staff on Demystifying Islam / Islamophobia and Ramadan. There is ongoing Race Matters work taking place, which focuses on how ASC can move forward and become an anti-racist organisation. The team also support with training for new Police Officers, assisting with roleplay scenarios.

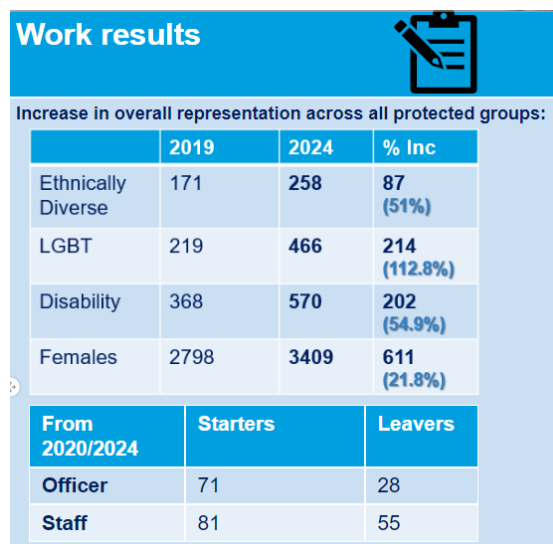


Figure 3 – one example of Data results illustrating what the team have achieved so far

Next steps moving into 2025 for the team include: a targeted campaign for increasing diversity in Police Staff roles, the development of a talent pipeline for ethnically diverse officers for promotion, further careers engagement for young people (+16) at Colleges/Universities and community events, increased engagement with external stakeholders to explore co-creating opportunities, and developing further internal Cultural awareness programmes linked with trauma informed education. Lastly to work towards the objective of becoming an Anti-Racist organisation. Read more about the Team’s work in their [Outreach Newsletter](#).

PROFESSIONAL STANDARDS DEPARTMENT (PSD) UPDATE

Chief Inspector Sharon Baker, Head of PSD Larisa Hunt



PSD STAFFING UPDATE

Since the last ISPCP there have been some staff changes. Superintendent Larisa Hunt has now been appointed as Head of Professional Standards Department. The panel extended a warm welcome to Larisa and look forward to working with her.

COMPLAINT HANDLING

One area where PSD have been making progress is in the number of complaints kept within the department and resolved, without the need to investigate or send the complaint out to other departments to handle. This year PSD assessors have informally dealt with and resolved 66% of all the complaints PSD received, this is an increase from 50% the previous year. An excellent achievement which will make a difference to the rest of the organisation particularly front line supervisors.

OTBI AND RPRP WORKSHOPS 2024

Sharon and Louise continue to deliver OTBI and RPRP workshops and approximately 400 supervisors have received training to date. The continued rollout of these workshops will remain a focus for 2025. Within the workshops, feedback from the ISPCP is mentioned so staff are aware that there is a formal mechanism in place for reviewing completed police complaints.

LEARNING MEETINGS

Captured learning for 2024 Quarter 2 was shared with the panel. The aims of the meetings are to effectively action identified learning captured from PSD investigations, to discuss the best means by which to capture learning and to instigate a force wide approach to learning and to provide a means by which to escalate significant matters to force level.

Comments from Supt Larisa Hunt, Head of Professional Standards Department:

"I am the new Head of Professional Standards for Avon and Somerset Constabulary and I was delighted to be able to attend the scrutiny panel in December and meet some of the panel members. What struck me was the time and detail each member put in to scrutinising the cases and I would like to take this opportunity to thank all panel members for their dedication and care to this work. I am looking forward to sharing the great work completed by panel members when HMICFRS visit Avon and Somerset for our Integrity Inspection in February. I attended the panel meeting with Chief Inspector Sharon Baker who has worked alongside the panel for a number of years. She has been successful in a temporary promotion to the Head of criminal Justice. I am sure you will join me in thanking her for her hard work and support and wish her well in her new role."



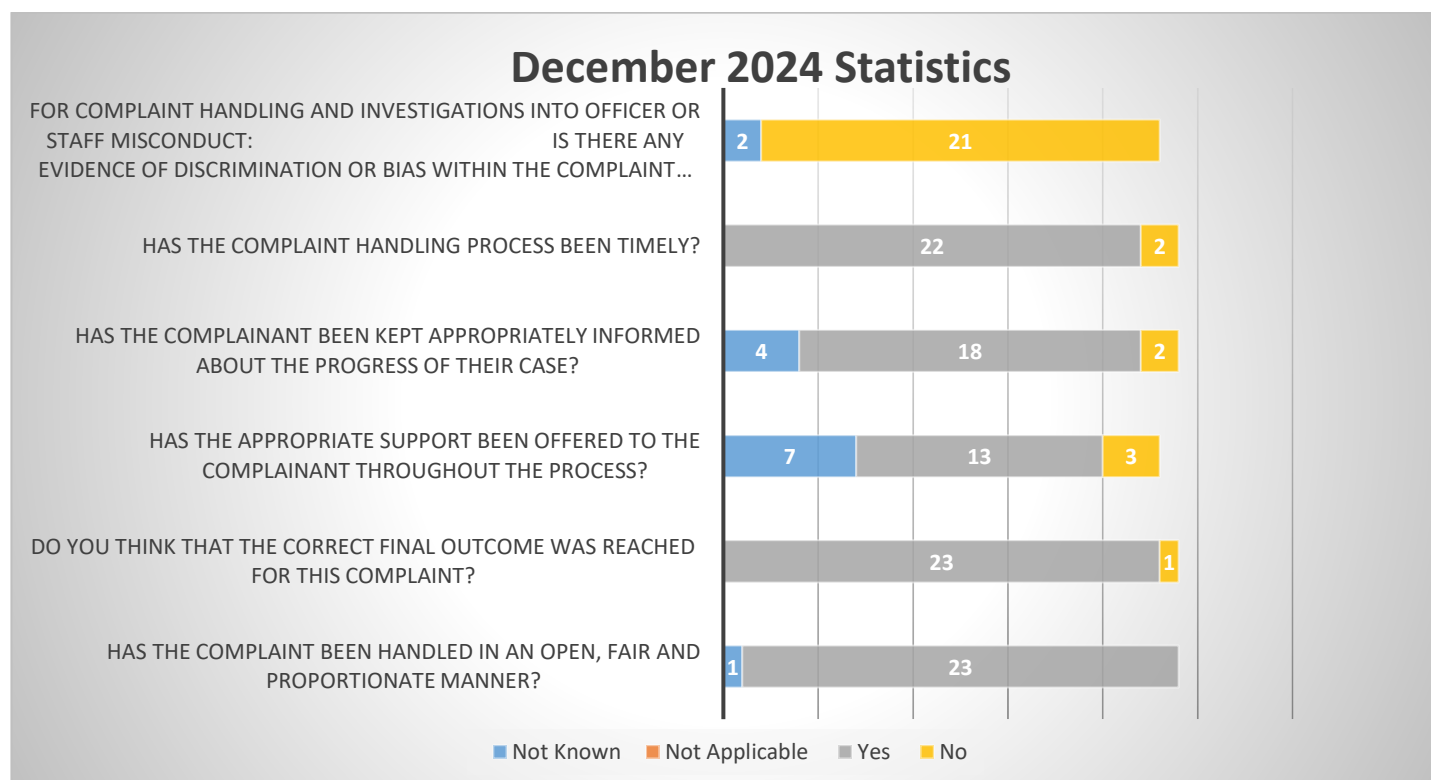
ACTIONS

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	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)	Dec 24 – C/I Baker shared Quarter 2 learning captured.	KIV
2	Feb 23	Schedule 3 advice issue to be monitored. (Panel)	Complainants can request that their complaint is recorded under Schedule 3. KIV the wording in the finalisation documents, 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'. Agreed this statement should be avoided as complainants could be dissuaded from exercising their right to have their complaint recorded.	KIV
3	Mar 24	Identifying Disproportionality in the Criminal Justice system. Recommendation 9 – examination of all Stop & Search Complaints to be examined. (Panel)	Sept 24 – ISPCP Chair confirms happy to take forward in 2025. OPCC to facilitate a meeting between the ISoPPP chair & ISPCP chair to discuss how this case scrutiny will interlink effectively between the two panels.	OPCC to facilitate meeting (DD OPCC)
4	Jun 24	Individual Learning Tracker created. New feedback system introduced: panel issues identified with grammar, spelling & tone of correspondence being sent out by PSD to complainants to be fed back directly to relevant individuals, this will also include positive feedback.	Dec 24 – system continues to work well with feedback being fed back directly to named individuals, including areas for improvement and work that can be positively praised.	Ongoing

No	Date	Action (OPCC, ASC, Panel)	Progress update	Completed Ongoing/KIV
5	Sept 24	IOPC Youth Panel National Survey Report - Youth-Panel-National-Survey-2024.pdf . ISPCP Chair requests an update from PSD on what they are doing to take account of the key recommendations contained in the report?	Due to recent staff changes from C/I Barlow, this action remains outstanding. BM to forward report to LH.	KIV
6	Sept 24	Otherwise Than By Investigation Workshops	PSD – workshops rolled out over the autumn, Powerpoint presentation shared with panel SB & emailed BM.	KIV
7	Dec 24	PSD have compiled a list of FAQs for the benefit of the panel (LP)	Share with Chair & Deputy for comments then circulate to all (BM)	Ongoing

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

HIGHLIGHTS OF CONCERNS, QUESTIONS OR ISSUES RAISED BY THE PANEL

Panel Member Feedback	PSD Response
<p><u>LC/1 - Complaint Summary (Discrimination)</u> Neighbour parking/blocking issues. Police involved after neighbours complained parking too close to their gate.</p> <ul style="list-style-type: none">• Age discrimination – dismissed the complainant was elderly, disabled and in ill health• No follow through when neighbours blocked her car parking space with a lorry on a previous occasion• Officer acted impartially <p><u>Panel Member Feedback</u></p> <p>1.) <i>Deadline for review application, final letter is 5/7 and 28 days from the day following is not 25/7/24. There was an earlier version of this final letter dated 27/6, which the complainant could not view/access. Date has been amended on the physical copy which was sent out, but not the appeal deadline date. Is this right, or should the appeal deadline be extended in line with the date of issue of the letter?</i></p> <p>2.) <i>Complainant struggling to access Box documents. I have seen many case files with similar access issues, are there any statistics on this, and is the constabulary going to review continued use of Box? I feel this is causing issues for some people and adds another layer of dissatisfaction when they are trying to access their outcome letters. As previous communications had happened via email, would it be better to attach a pdf of the final letter to an email if this had been a successful method of communication with the MOP?</i></p>	<p><i>I've asked for a response to each point from Owain our Admin manager:</i></p> <p><i>'The review period is from the date the final letter is created and shared with the complainant, there is an argument that because the complainant experienced issues accessing via box, the review period could have been changed, however, this isn't something that happens often enough for us to have a standard stance or policy on it.'</i></p> <p><i>'We have now stopped using Box. Box was originally introduced a number of years ago mainly as a safety net due to the volume of emails the admin team send (often working on multiple tasks at the same time) to ensure a document isn't sent to the incorrect recipient. However, we have now put additional measures in place (like better shift planning to minimise multi-tasking) to greatly reduce the risk'.</i></p>

Panel Member Feedback	PSD Response
<p>3.) I have also noticed that the complainant was given two different passwords to access her Box documents. One was the case reference and her Surname (email dated 27/6), one was the case reference and her First name (email dated 28/5). This may have added to the confusion and inability to access her docs. Is there a standard format for the passwords?</p>	<p><i>'The standard format for passwords is case reference followed by Surname, however, if the complainant is experiencing issues, we would try other similar formats'.</i></p>
<p><u>LC/3- Complaint Summary (Discrimination)</u> Car marker for firearms. Allegations:</p> <ul style="list-style-type: none"> • Impolite language/tone (x2) • Overbearing or harassing behaviours • Race discrimination <p><u>Panel Member Feedback:</u></p> <p>1. Very long time from receiving complaint to final letter, almost 9 months. No evidence on keeping the complainant informed of progress during this time, deprived of their medication at the point when it is due?</p>	<p><i>Explanation provided in final letter:</i></p> <p><i>'Firstly, let me apologise for how long this has taken to review. The officer who has been subject of this complaint was away from my team for quite some time but has now returned. Alongside our daily demand this has made it quite difficult to send you this letter. I do apologise for this, and I appreciate the phone call we had was some time ago'.</i></p> <p><i>Agreed complaint handler could have made contact in meantime to manage expectations. This was a district inspector and there are issues with the level of demand on CIMs. We have run the OTBI workshops where we emphasise the importance of keeping complainants updated. Also, a district complaint handler doesn't have access to PSD case docs, so if they have contacted a complainant, they will be saved to their own records not the case docs. There may have been more contact, although it would appear from the apology there probably hadn't been in this case.</i></p>
<p><u>AD/1 - Complaint Summary (Discrimination)</u> Complainant alleges discrimination in the form of bullying of a person with a protected characteristic.</p>	

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

The complainant withdrew their complaint because since raising the issue, they reported harassment had ceased, so why?

This suggests merit behind the original complaint, in which case the investigation should continue to determine whether the officer involved had any influence in the decision to withdraw, or whether the conduct preceding withdrawal did in fact warrant action.

On this basis, I cannot answer positively to the review questions.

Very valid observations. The decision whether to pursue a withdrawn complaint is made on a case-by-case basis. If the IO feels there may be a serious issue which would need Misconduct recording and investigating, they could and should do further fact finding.

I have spoken with the IO for this case. She did not stop investigating as soon as the complaint was withdrawn, she made some additional proportionate enquiries. She spoke with the PCSO, checked records and viewed his messages on his phone. This confirmed his account that his visits to the complainant's address was linked to an on-going neighbour dispute. The complainant had made it clear he was unhappy about the contact and would make a complaint, this was reported by the PCSO at the time. These enquiries were recorded by the IO on Centurion and a rationale given for filing the complaint.

PR-3 – Complaint Summary (Discrimination)

Complainant alleges police have shared her confidential details with other agencies. She also claims the police have falsified information about her, and that this has been gained through a chip being implanted into her during a medical examination. She further claims that she has been discriminated against by the police and that they have been racist in attitude towards her.

The officer investigating this complaint, sent emails requesting evidence to support these allegations, asking for names or numbers of offending officers and details of specific occurrences. No evidence of this kind was forwarded by the complainant.

It transpires that the complainant had made similar complaints which had been investigated previously under schedule 3 and not upheld. There is a long-documented history of this person making these same complaints stretching back to 2018. During a 4-day period in Dec 23 nine complaints were made, basically

Panel Member Feedback

PSD Response

repeating the same claims but without providing evidence.

When an officer went to interview this lady over her claims, she reported back that she made “no sense”.

Reading through the file I found the claims to be both chaotic and irrational. There are language difficulties in that the complainant’s native language is Polish, but the accusations appear to be random and wildly inconsistent, and largely incoherent.

The outcome of the investigations which were presented in the final letter said that it was neither reasonable nor proportionate to take further action.

Panel Member Feedback:

Is there any limit to number of complaints a person can put forward for investigation, particularly if all of the complaints are broadly similar and raising the same issues?

There is no limit to how many times someone can complain, but we do have a ‘repetitious complainant’ policy, and we may record the complaint, but we do not have to investigate it. The policy has been followed in this case.

An initial assessment will be made to ensure there is nothing new or valid within the complaint, then if it is found to be a repetition of a previous complaint the complainant will be notified, and the matter will be filed under the original complaint.

Sometimes allegations which appear similar will be split when different national markers are identified. So, for example, if the complainant now says she believes the police actions are racist. Assessors would potentially split that allegation from the main broad complaint to identify an allegation of discrimination.

KS-2 - Summary of Complaint (Discrimination)

Complainant alleges:

- 1.) When he needs the police he is ignored, but when neighbours complained the police were prompt to arrest him. Police are biased and discriminate on the grounds of his mental health, no evidence to support this. On balance of probabilities service was acceptable
- 2.) Use of excessive force when arresting him. On balance of probabilities service was acceptable
- 3.) Officer lied to court about loosening the handcuffs. On balance of probabilities service was acceptable
- 4.) He was interviewed when not in a fit state. On balance of probabilities service was acceptable.
- 5.) Care in custody was inadequate - no medication as no nurse available. On balance of probabilities service was acceptable

Panel Member Feedback	PSD Response
<p>6.) Complained to Sgt who took action but did not log complaint. I have not been able to determine whether service was acceptable</p> <p>Panel Member Feedback: <i>Is the Investigation Plan required for all complaints? It sets a clear framework for supervising and reviewing compliant investigations, ensuring that nothing is missed. A good learning tool.</i></p> <p><i>Is this final letter format now required for all complaints? It is excellent! Easy to read but a full explanation, clearly showing how the decision was reached.</i></p>	<p><i>Only required on Misconduct or Gross Misconduct investigations, but supervisors might add an investigation plan on other investigations depending on the skill set and experience of the investigator.</i></p>
<p><u>BK-1 - Summary of Complaint (Discrimination)</u> Complainant alleges police have let her down and that she was physically assaulted and racially discriminated against. Stated police officer told her to 'go back to her home country'.</p> <p>Feedback Panel Member 1: <i>Was any support/signposting offered to complainant?</i></p>	<p><i>Complainant has had a lot of contact from police. I can see the incident she complained about and the relevant niche, and clear efforts were made to support the Complainant. Entry on niche:</i></p> <p><i>'D****' was offered phone number for mental health but she stated she does not require them as she attends the BRI when she has mental health difficulties.'</i></p> <p><i>There has since been a safeguarding niche raised to liaise with partner agencies for a safeguarding strategy.</i></p> <p><i>There is a difficulty in signposting complainants to mental health services as they can feel insulted that we are suggesting they have mental health issues.</i></p>

EXAMPLES OF POSITIVE FEEDBACK SHARED BY THE PANEL



“A very thorough OTBI file, a pleasure to review..... Excellent final letter. Very detailed setting out the evidence explaining the terms (Web Storm Log, Niche, & BWV) reviewed and clearly showing how the conclusions were reached. Evidence includes quotes from PACE, stills from BWV, and an image showing how the handcuffs should look, compared with the image of complainant in handcuffs.”

“This was a very thorough and rigorous investigation concluding with a well written letter sensitively dealing with the issues raised by the complainant. The letter also admitted to some policing failures on the day of the incident and offered an apology. Furthermore, the offer by the Chief Constable to meet with the preacher to discuss the situation seems a very prudent gesture to make.”

“Correspondence was timely and provided detailed information. The final complaint letter was divided into 3 sections – outlining the complaint and officers involved; recorded details of telephone conversation with the investigating officer; the conclusion and rationale within which each allegation was made clear. This method provided information that was easy to understand and the logic behind the decisions made. The Right of Review information, with dates was provided within the final letter.”

“Appears to have been a very thorough and wide-ranging investigation including interviewing officers, reviewing BWV and the custody record, as well as digital information supplied by C. The BWV in particular gives some comfort that the officers were professional as they are described to be in the report”

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

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