



A review of police handling of complaints outside of Schedule 3

October 2026

Contents

Contents	2
Summary	3
Background	3
Key findings.....	3
Methodology.....	4
Detailed findings.....	5
Was the decision to handle the complaint outside Schedule 3 reasonable and proportionate?	5
Was the outcome provided outside Schedule 3 reasonable and proportionate? ..	8
Good practice	9
Follow-up work	10
Feedback to forces and local policing bodies	10
Survey to all forces	10
Conclusion	12
Next steps	12

Summary

Background

This project follows previous IOPC Oversight work designed to review and improve police handling of complaints. In particular, we are seeking to support forces to increase the likelihood of complaints being resolved at the first attempt, highlight the importance of early engagement, and decide (and rationalise) the most appropriate handling method from the outset.

Previous work by the IOPC highlighted areas of good practice by police forces in their processes and team structures for initial complaint handling. Our work also identified variances in practices around initial contact and 'informal' handling of complaints.

Police complaints statistics also showed a notable difference in the number of complaints being handled outside the provisions of Schedule 3, of the *Police Reform Act 2002* across the 43 forces. Some forces handled as much as 80% of total complaints outside of Schedule 3, while others did far less. The Oversight Team sought to understand the reasons for this variance. We assessed whether the test for recording complaints was being applied correctly, and identified any shareable practices which may promote effective and timely handling of complaints outside Schedule 3.

Key findings

- We agreed that the majority of cases in the sample were suitable for handling outside Schedule 3, but found that 13% of cases in the sample (48 out of 361), should have been recorded.
- The 13% of cases we disagreed were suitable for handling outside Schedule 3 included allegations about violence against women and girls (VAWG), discrimination, use of force, and corruption.
- We found that outcomes provided in cases handled outside Schedule 3 were mostly considered reasonable and proportionate, but found 7% (26 out of 361) of outcomes were not. This was typically due to allegations being missed, the brevity of the explanation of the outcome, or the tone or format of the outcome not being reasonable or proportionate to the nature of the complaint made.
- Variance across forces, in the proportion of complaints being handled outside Schedule 3, may be partly explained by the finding that not all complaints handled outside Schedule 3 are being logged in a way that ensures they are captured for national reporting.

Methodology

Seven forces were invited to participate in the sampling exercise. We chose a mix of forces that appeared from the national complaints statistics to have handled a high percentage of complaints outside Schedule 3 and those that handled a much lower percentage.

We reviewed 361 complaints cases confirmed to have been handled outside Schedule 3 between October 2023 and September 2024. The sample included complaints that were finalised outside Schedule 3, as well as complaints that were initially handled outside Schedule 3 before being recorded.

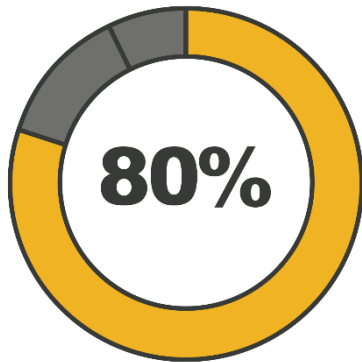
Cases were randomly selected from lists of complaint reference numbers for cases handled outside Schedule 3. As a remote sampling exercise, the original complaints and the background papers were shared with us electronically.

Sampling was conducted by reviewing the case files for each complaint provided and entering data on to a spreadsheet for analysis. The sampling considered whether the decision to handle the complaint outside Schedule 3 was reasonable and proportionate, as well as whether the outcome provided to the complainant was reasonable and proportionate. As part of our review of the complaints and analysis of the handling, we considered the quality of the record-keeping, the clarity and appropriateness of any explanations provided to the complainant, and whether it appeared complainants' rights were explained to them, if they remained dissatisfied with the handling of their complaint.

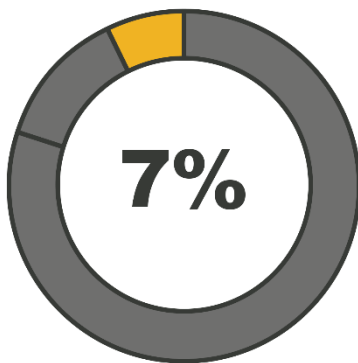
We are very grateful to the forces involved for their participation in this project, for the information shared with us and their support to complete the dip sampling work.

Detailed findings

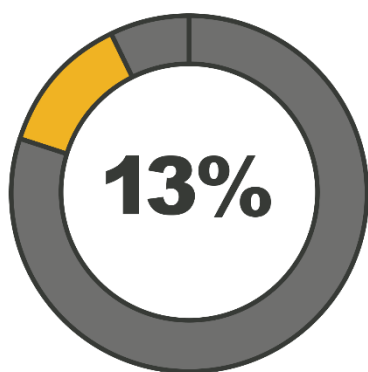
Was the decision to handle the complaint outside Schedule 3 reasonable and proportionate?



We **agreed** that the decision to handle the complaint outside Schedule 3 was reasonable and proportionate in 80% (287 out of 361) of cases. Common types of complaint in this category were allegations of low-level rudeness or abruptness by officers or call-handlers, dissatisfaction about waiting long periods for property to be returned, lack of updates for ongoing investigations, and concerns about the handling or closure of matters reported to the police.



In 7% (26 out of 361) of cases, while we did not have any significant concerns about the decision to try and resolve the matter outside Schedule 3 in the first instance, we considered the wording of the complaint to sit close to the recording threshold. Complaints of this type can be suitable for handling outside Schedule 3 but may require clarification with the complainant. Fully exploring and understanding the dissatisfaction and the complainant's expectations during initial contact is crucial for deciding the most appropriate handling method, especially for these types of cases. Ensuring a good audit trail of any telephone or email exchanges with complainants and documenting the rationale for any decisions made is also important, particularly where discussions may have influenced the decision about how to handle a matter. In this batch of cases, it was not always clear whether any such engagement had taken place, and/or a clear rationale for the decision to handle the complaint outside Schedule 3 was not documented.



We **disagreed** with the decision to handle the complaint outside Schedule 3 in 13% (48 out of 361) of cases sampled. This category included complaints that required recording from the outset based on the nature of the allegations made which, if proven, would justify the bringing of criminal or disciplinary proceedings i.e. allegations of discrimination, violence against women and girls, use of force resulting in serious injury, corruption, and sexualised behaviour.

In some of these cases, it appeared that readily available information e.g. a custody record, crime report or body worn video footage, was used to respond to the complaint quickly and this may have influenced the decision not to record the complaint. These complaints should be recorded formally but handled otherwise than by investigation.

Within the sample, we also saw complaints being finalised outside Schedule 3 for reasons such as:

- **Progressing the complaint would prejudice ongoing criminal investigation. The complainant was advised to make their complaint again after the criminal investigation and any proceedings were completed.**

Where handling a complaint would prejudice an ongoing criminal process, the complaint should be recorded and suspended. See [Focus issue 24](#) for guidance on suspended cases.

- **The complainant did not respond to attempts to contact them.**

If a complainant did not engage after reasonable attempts were made to contact them, the complaint should be recorded and may be subject to a 'no further action' decision if there is insufficient information available to progress the complaint. Complaint handlers should still consider whether a conduct investigation is required.

- **The complaint meets the recording criteria, but is similar or the same as a complaint about the same matter that was already handled, and an outcome provided, under the provisions of Schedule 3.**

If a complaint meets the recording criteria based on the nature of the allegations, it should be recorded. The complaint may still be handled in a reasonable and proportionate manner and, if appropriate, the findings of the previous complaint handling may assist with addressing the new complaint.

However, complaint handlers should consider whether any new allegations have been raised, or any new evidence provided, which has not previously been addressed.

The types of allegations we disagreed were suitable for handling outside Schedule 3 were varied, but most commonly fell into the following themes:

- excessive force
- corruption and integrity issues
- failure to safeguard vulnerable victims
- poor treatment in custody
- discrimination
- errors in policy or legal process e.g. unlawful entry/searches, improper disposals, breach of sensitive information

Violence against women and girls

Complaints relating to violence against women and girls (VAWG) and discrimination are unlikely to be suitable for handling outside Schedule 3, except in limited circumstances. Of the cases we disagreed were suitable for handling outside Schedule 3 (48 cases), 17% (8 cases) fell into the VAWG category. Five of these complaints related to the police response to ongoing domestic abuse reports. Two of these raised concerns about a police failure to recognise ongoing behaviour by a perpetrator as breaches of existing protective orders. VAWG complaints in the sample also included allegations of inappropriate touching, covering up for a police perpetrator, failure to protect a victim-survivor of abuse from further harm, and officers minimising serious incidents or making inappropriate comments about victim-survivors.

We note the complaint files we sampled dated from October 2023 to September 2024. In June 2025, we published [Issue 23 of Focus on violence against women and girls](#) which provides more guidance on handling complaints relating to VAWG.

Discrimination

There were two complaints involving allegations of discrimination that we considered should have been recorded. Complaints of discrimination are unlikely to be suitable for handling outside Schedule 3.

There were two more complaints that we considered should have been explored further with the complainant during the initial contact, to clarify any discriminatory elements. If this was explored, we needed a better audit trail of any complainant engagement to understand the reason why the complaint was deemed suitable for handling outside Schedule 3.

Use of force

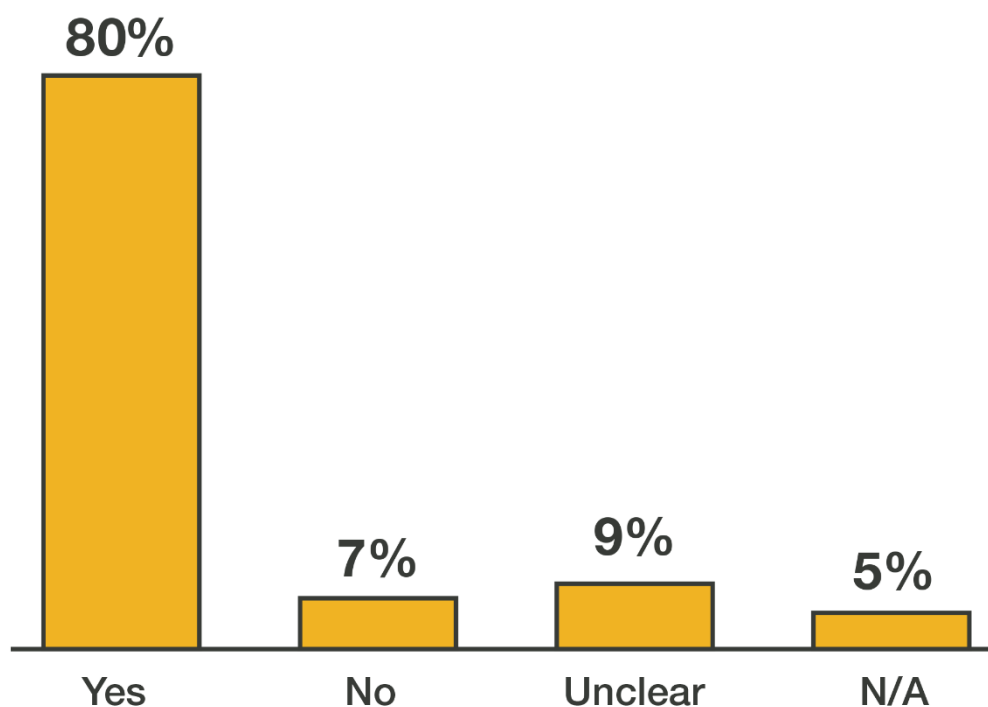
Use of force complaints within the sample varied from dissatisfaction that handcuffs were used during an otherwise compliant arrest, to complaints that officers used

excessive force resulting in a serious injury. In some cases, the decision to informally handle the allegation relating to force appeared reasonable based on the information available to us. However, complaints involving more serious allegations of excessive force, force being used on children, and force resulting in fracture injuries should have been recorded from the outset and considered for IOPC referral.

Corruption and integrity issues

The sample included complaints which raised concerns about corruption and the honesty and integrity of officers. This included allegations of officers providing false accounts, covering up a sexual assault, protecting a suspect of domestic abuse and deleting or tampering with evidence. These complaints required recording from the outset on the basis that, if proven, they would justify the bringing of criminal or disciplinary proceedings. It is important that this test is applied based on the wording of the allegations alone, not on their apparent merit even if there may be information readily available which indicates the allegation may not be supported by evidence. Complaints of this nature should also be considered for IOPC referral.

Was the outcome provided outside Schedule 3 reasonable and proportionate?



We **agreed** that the outcome was reasonable and proportionate in 79% (284 out of 361) of cases sampled. We saw examples of well-explained, sensitively worded and timely outcomes being provided outside of Schedule 3.

Out of the 48 cases in the sample we considered should have been recorded from the outset, it is noted that for 14 of these cases, we still felt that the outcome provided was good from a customer service perspective. We saw examples where thorough explanations were provided, relevant sources of evidence such as body worn video or custody records were referenced, and the findings and any actions arising from the complaint handling appeared to address the matters to the satisfaction of the complainant.

Reasons why outcomes were **not** considered reasonable and proportionate included:

- allegations missed
- enquiries too limited to fully address the complaint
- explanations too brief or unclear
- communication preferences not followed
- language or tone of written outcomes not appropriate
- format of the outcome not appropriate for subject matter (e.g. voicemail left for a vulnerable complainant regarding a sensitive matter)
- the decision (resolved/not resolved) did not appear to reflect the complainant's view
- the complainant appeared to remain dissatisfied, but their complaint was not recorded or that their right to have the complaint recorded was not explained.

We were unable to assess the outcome in 9% (34 out of 361) of cases. This was due to there being insufficient records of what actions were taken or what information was provided to the complainant.

Complaints handled outside Schedule 3 are not expected to have the same level of written record as complaints handled formally under Schedule 3. However, records should contain enough information to show what action was taken to deal with the complaint and what information was given to the complainant as an outcome. Where a complainant was updated verbally, a short summary of the conversation should be documented.

There were 18 cases (5%) where there was no outcome provided outside Schedule 3. This was due to complaints initially assessed as suitable for handling outside Schedule 3 being recorded, before an outcome could be provided.

Good practice

It is positive that we agreed the decisions to handle a complaint outside Schedule 3 and the outcomes provided were reasonable and proportionate in the majority of cases in the sample.

Overall, we found the audit trail was easier to follow and more detailed where the complaint handling was documented on a case management system e.g. Centurion.

Where template forms to document the actions taken to handle a complaint were completed in full, they gave a clearer record of the reasons for the decisions made,

any engagement with the complainant, and the actions taken to respond to the complaint.

We saw some examples of clear and very thorough responses to complaints, as well as some empathetic and supportive, written outcomes to sensitive matters.

One force, where we agreed with their decisions in 92% of cases, shared with us the practices and principles they consider are key to successful informal handling of complaints. They emphasised the importance of recruiting the right people into complaint handling roles - people with customer service backgrounds who are willing to pick up the phone to have a conversation with a member of the public.

Follow-up work

Feedback to forces and local policing bodies

We met with all seven PSDs involved in the dip-sampling to provide individual feedback on the cases they provided, supported by a written report of the findings for their force. In these meetings, we emphasised the importance of maintaining a good audit trail of any actions taken. In particular, we encouraged more detailed documentation of the substance of any discussions when making initial contact via telephone, particularly if those conversations are influencing the decision to record a complaint or handle it outside Schedule 3.

We also reminded PSDs that the test for whether a complaint must be recorded is based on the wording of the complaint alone, without taking into account the merit of the allegations made and without considering available information, even if relevant information or evidence is readily accessible.

We provided the same feedback and report to the local policing body for each force for their information and awareness.

Survey to all forces

We contacted all force PSDs about their set up for complaints handling to provide us with an overall picture of logging and recording practices.

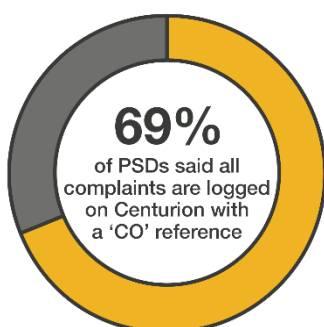
We received 29 responses.



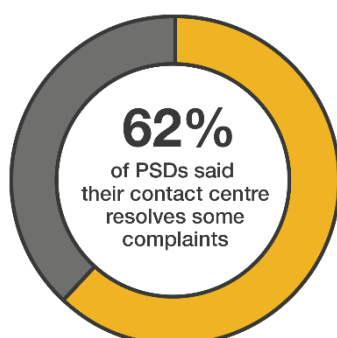
Two forces informed us that they are not aware of all complaints, as they operate under model 2 or 3, therefore we would not expect them to be aware of all complaints as their local policing body is responsible for handling complaints outside Schedule 3. Nevertheless, those forces would still be aware of the types of complaints being logged.

A further six forces responded that they may not be informed about expressions of dissatisfaction that are immediately resolved there-and-then by an officer or supervisor e.g. by providing an update. Other PSDs advised that they are not necessarily made aware of expressions of dissatisfaction made to other departments. On the face of it this may seem concerning, but if we revisit the guidance we gave to forces when legislation changed in 2020, and also what is contained in our [data capture guidance](#) document, it can be read as consistent with that. We said to forces:

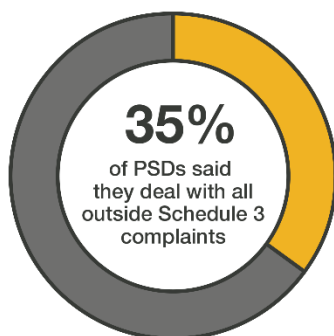
You must consider the intent of the complainant: if it is an enquiry of someone dissatisfied, that is resolved quickly, to the satisfaction of the complainant, then forces need not formally log it. We are not suggesting that everything handled in control rooms for example, should be logged, if the complainant is satisfied with the response.



Not all complaints handled outside Schedule 3 are being logged in a way that ensures they are captured for national reporting. Some expressions of dissatisfaction remain on control room / call centre systems or are entirely handled outside of PSDs, on division.



Of the 62% (18 of the 29) responding PSDs that informed us that their contact centre resolves some complaints, half of them confirmed that their contact centre has complaint handling guidance. Only a third could confirm that the complaints handled by the contact centre are captured as data for learning and trends analysis.



The remaining 65% advised that complaints that are low-level and suitable for service recovery through outside Schedule 3 handling are either handled by PSD or may be sent out on division.

Conclusion

As discussed above, when legislation changed in 2020, the IOPC advocated a 'common-sense' approach to the logging of expressions of dissatisfaction. We realised that when a matter can be resolved satisfactorily and immediately, to build an administrative process around such matters may be disproportionate. Provided there was a way to audit the issues, then it could be left to the discretion of the force. HMICFRS have reiterated the need for forces to have knowledge of those issues that don't get formally logged or recorded in the police complaints system, in order to identify themes, trends and learning opportunities. Police forces need to ensure that these proportionate arrangements do not stray beyond the type of issues that can be resolved quickly, and that proper scrutiny is given to those complaints that should be logged and recorded, taking into consideration the intent of the person raising the issue.

Next steps

We are reviewing our existing guidance for any areas where clarification or additional case studies may assist forces to meet their statutory obligations and provide a good customer service when dealing with complaints. In particular, we are considering if additional messaging is needed around the recording threshold and how to apply that test, with a particular focus on complaints about VAWG, use of force, corruption and discrimination.

As above, we will review our guidance on the common-sense approach to handling matters immediately, to ensure it gives forces enough detail to understand what kind of complaints need to be logged and recorded. We always welcome feedback in this area.

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