

# OVERSIGHT

## newsletter

Welcome to our monthly newsletter which provides updates about the work of the Independent Office for Police Conduct (IOPC). The newsletter is for complaint handlers in forces and local policing bodies (LPBs).

### Violence against women and girls update

#### New strategic lead

The IOPC has appointed Amanda Rowe, Director of Operations, as the new strategic lead for the violence against women and girls' thematic work. Amanda replaces Thea Walton, who recently left the organisation on secondment. Amanda said of her new role, *"this is a vitally important area of work for the IOPC and the wider criminal justice system. I am keen to continue the excellent work led by Thea and the team so there is greater awareness across the IOPC on these issues, It's important that everyone works together to make improvements in this area and support people affected by violence against women and girls, which also includes police-perpetrated domestic abuse"*

#### Referrals analysis

We will soon publish our referrals analysis report on violence against women and girls. This report is a statistical analysis of the referrals received by the IOPC to assess what police forces are referring to us. We will use this as a baseline to monitor and compare referral rates in the future.

#### End-to-end case handling review

We invited the following forces to take part in the dip sampling project of violence against women and girls' cases:

- Cumbria
- Cleveland
- Greater Manchester
- Gwent
- Leicestershire
- Merseyside
- Staffordshire
- Wiltshire

Thank you to the forces that agreed to be part of the project. We will be in touch (if we haven't already) to arrange dates for members of the team to visit your offices over the summer months.

### Timeliness reporting requirements

Thank you for continuing to update us on investigations that have exceeded 12 months. When completing your timeliness reports, we would be grateful if you could include the following information:

- Force reference number
- Date the complaint was made (for complaints) or the date the conduct came to the attention of the AA (for conduct)

- Name of the complainant for complaints, name of the officer under investigation for conduct matters, and names of the deceased or injured person for death or serious injury cases
- For 18, 24 or 30 month updates, please ensure you specify the reasons for the delay occurring within the most recent six month period, (this could be different to reasons for the delay in the initial 12 months).
- If you have multiple cases that need a timeliness report, please send each case on a separate form for GDPR purposes. You can send us multiple forms as separate attachments in one email if needed.
- For suspended cases, please provide a summary of the complaint and how it links to the criminal investigation. Please also ensure you continue to provide a timeliness report every six months during the suspension, not only when the investigation resumes.
- Please highlight any sensitive information within the letter that should not be disclosed to the subject officer(s) or complainant.
- Please aim to send us timeliness reports as close as possible to the due date.
- Please remember to notify us when you submit the investigation to the AA.

Having all of the required information available from the outset helps us to avoid sending you follow-up emails to clarify the details. We thank you for your cooperation.

## Recent information

### Letter to Chief Constables about the super-complaint on the police response to stalking

The Independent Office for Police Conduct, His Majesty's Inspectorate of Constabulary and Fire & Rescue Services and the College of Policing have written to Chief Constables to confirm that we have started our joint investigation into the super-complaint on the police response to stalking. The super-complaint was submitted by the Suzy Lamplugh Trust on behalf of the National Stalking Consortium. The full super-complaint can be found at [GOV.UK](https://www.gov.uk), along with information about the super-complaint system. We are aiming to complete our investigation this year and report on our findings and any recommendations in 2024.

### 'Call it out' campaign at Merseyside Police

Merseyside Police is conducting a programme of work around inclusion and recently launched their 'Call it out' campaign. This is based on the premise that if staff feel empowered to challenge behaviour internally, this will positively impact on the internal force culture and in turn, police interactions with the public. The emphasis is on being reflective, emotionally aware and taking responsibility.

A key piece of work around training for staff is under development. The force has commissioned local service providers with lived experience of topical matters to deliver face-to-face training. They recently collaborated with the Anthony Walker Foundation to create and deliver bespoke discrimination training to staff. The training is in development but will cover areas such as anti-racism, history of policing minority ethnic communities, connecting the history to local issues, and the relationship between police and local communities. Force leaders felt that staff will relate to and understand the stories of personal impact more keenly if they address local policing and relationships with communities in Liverpool.

They are also refreshing existing training and providing new opportunities for learning to staff. Enhanced training is being offered to those in leadership roles and there is an emphasis on access to continuous professional development for all staff. Examples include:

- Diversity and inclusion – This looks at raising awareness of how society changes, use of language and tackling offensive terms through open conversations.
- Leadership and me – The focus of this training is how to proactively model and promote positive behaviours.
- Leadership programme – The aim is to empower first line leaders to lead their teams well, live and maintain standards and values, engage in difficult conversations, and manage their staff effectively.
- Sponsorship events – New staff are allocated a senior sponsor to engage in discussions on topical matters, to build awareness and knowledge.
- Online training platform – The force is looking to develop a 24-hour self-service training platform that provides access to training on a large range of topics. The idea is that staff can access the training at any time, to help equip themselves in real time to deal with a current issue or task. For example, they can work through a scenario or briefing session to prepare for an incident they have been called to or a community meeting they are attending.
- Annual refresher training on standards and values – This focuses on themes, for example, police-perpetrated domestic abuse or use of social media, and includes knowledge checks and ethical based discussions. Staff are expected to proactively demonstrate positive behaviours and values.

The Fairness in Policing team provides scrutiny on use of powers, including stop and search and use of force. Members of the community are invited to review encounters and can provide feedback. In one example, there had been a firearms stop of a Black man where there were concerns raised by the local community about potential racial profiling. The group looked at the body worn video and listened to the initial call made alongside the deployment of officers. It established that the person stopped matched the description given in the area being searched. It was also seen that the police officers involved had dismissed other Black members of the public as not meeting the description. The group was satisfied that this demonstrated the police had acted appropriately on relevant information and had not racially profiled the man.

## **? Common questions from forces and LPBs**

**Q: On cases involving violence against women and girls, does the IOPC have any views on managing expectations of the victim where there is allegations of both criminal and conduct matters? There can be challenges when the victim thinks that if the criminal matter ends in ‘no further action’ (NFA), the allegation will always be rectified through conduct proceedings.**

A: The [report](#) into police perpetrated domestic abuse arising from the Centre for Women’s Justice super-complaint includes a recommendation that chief constables assure themselves that case updates and information are shared with victims in an accessible way that encourages trust and confidence in the police response.

Forces should therefore already be taking steps to ensure that updates allow complainants to understand the actions taken and decisions reached. Through our dip sampling work with forces, we will review how they communicate with complainants and how they communicate outcomes. As part of this, we can look at how forces are managing expectations, review whether the processes are explained well, whether the language is easy to understand and free from jargon. Complaint handlers should be able to explain the different burdens of proof and clarify that even though the bar is lower for misconduct, it doesn’t mean that misconduct will be proven. It is equally important that complaint handlers avoid the presumption that a conduct matter should not be pursued due to the fact that the criminal prosecution has reached the outcome of NFA. It will also be important that they have conversations around whether the most appropriate route for handling the matter is via a complaint or as a conduct matter, where the victim is treated as an interested person.

**Q: When the IOPC updates the Professional Standards Department (PSD) and complainant with the timeframe for allocation of the review, could the IOPC routinely update the Federation as a significant stakeholder, so that they can start to manage the welfare of the subjects etc?**

As part of the local complaint handling, PSDs will usually engage with the Federation according to the individual circumstances of the complaint and needs of the subject. Given this, it would not be appropriate to issue an update to the Federation for every review we receive with the allocated timeframe. This information can be provided by the PSD as and when needed.

We acknowledge the impact of lengthy complaint handling on officer/ staff welfare and that our reviews backlog contributes to this. So we urge you to contact us as soon as possible if you believe the review should be prioritised because of concerns around welfare and we will consider whether we can allocate the review earlier. There are some IOPC teams that regularly engage with Federation representatives and through this forum, we are happy to discuss any concerns about the impact of our backlog on the staff and officers they represent. Our current allocation timescales are available on the IOPC website, so please do circulate the [link](#) to the relevant policing stakeholders who may have an interest.

**Q: One strand of a multiple-allegation complaint needs to be suspended as it is linked to a criminal investigation. However, the complainant has asked us to suspend the entire complaint. Are we required to follow the wishes of the complainant?**

A: You do not have to suspend a complaint on the request of a complainant. However, it is worthwhile working with the complainant to help them understand any approach you decide to take. You may wish to discuss the matter with the complainant to understand the reasons for their request and their concerns about proceeding with the other strands of the complaint. You could also begin any lines of enquiry but wait before deciding on any findings. Alternatively, if the strand of the complaint that requires suspension is very different to the other strands, you may consider splitting the complaint.

**Q: Is a complainant required to provide their address and contact details?**

A: There is no requirement for a complainant to provide their address, if you have another way of contacting them and you are satisfied that they are who they say. You must also be satisfied that the complainant is eligible to make their complaint, which can be difficult when limited information is provided. If proving eligibility is an issue, you should explain this to the complainant and that their complaint will not be logged or recorded. Where limited personal information means that you cannot find out more about their complaint or any linked incidents, you may only be able to provide a limited explanation or conclude with 'no further action' as your decision.

## Corporate news

### **Our statement on the 30th anniversary of the murder of Stephen Lawrence**

Tom Whiting, IOPC Interim Director General, said:

"Today marks 30 years since the murder of Stephen Lawrence in Eltham, South London. The tragic events that unfolded on 22 April 1993 shook our country to its core, changing the policing model in England and Wales forever. It is the very reason the Independent Office for Police Conduct exists today.

"Today, we remember Stephen – and the loved ones who have fought tirelessly to ensure his legacy lives on. We remember, we reflect, and we reaffirm our commitment to driving change wherever it is needed.

"Thirty years on, Stephen remains at the heart of our organisation, and everything we do to improve policing practice for all."

### **National recommendation to review bail policies, procedures and training**

The IOPC recommends that the National Police Chiefs' Council (NPCC) shares the learning from IOPC cases with force bail leads, asking them to review their bail policies, procedures and training to ensure that risk assessments are conducted when suspects of child sexual abuse offences answer bail.

This follows an IOPC review of a death and serious injury local investigation where a male under investigation for child sexual abuse offences took his own life one week after answering bail. A risk assessment was not conducted when he attended the custody suite.

There is already an expectation that suspects of child sexual abuse offences should be subject to a risk assessment when answering bail, and during other potential 'trigger events', as outlined in the College of Policing's operational advice on 'Managing the risk of suicide for persons under

investigation for online child sexual abuse and exploitation'. However, IOPC cases have identified some inconsistent practices between different forces in how they apply this advice in relation to the use of risk assessments during such situations.

## **Latest news**

Keep up to date on our investigations and other work to increase public confidence in the police complaints system. You can find our [latest IOPC news](#) on our website.

[Former Greater Manchester Police cadet leader convicted of sexual assault](#)

[Former West Yorkshire Police detention officer sentenced over offensive social media posts](#)

[North Wales Police officer dismissed without notice after gross misconduct proven for viewing intelligence without a police purpose](#)

[Former Met officer charged following investigation into corruption allegations](#)

[Gross misconduct proven against South Wales Police officer who was dismissed for repeatedly punching a man](#)

[Investigation finds Thames Valley Police firearms officers acted appropriately during fatal shooting in Milton Keynes](#)

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If you have any questions, please get in touch with your Oversight Liaison or a member of the Oversight team.

