

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).

Information for police

You can find lots of useful information for police officers and staff on our [website](#). This includes information and guidance for professional standards departments, complaint handlers and local policing body reviewers.

Topics include complaint handling guidance and a toolkit, IOPC discrimination guidelines, guidance on managing unreasonable and unacceptable complainant behaviour, an operational advice note on 12-month timeliness reports and more.

Outside Schedule 3 project update

As mentioned in a previous newsletter, we have worked with seven forces to dip-sample files on handling complaints outside schedule 3.

We have completed the dip sampling of cases and categorised them. During the summer, we will feed back to the forces involved.

The aim of looking at these types of complaints was to understand the differences in how different force are using informal complaints handling, and whether the thresholds for handling are correct in the forces that were doing more informal handling. We also wanted to understand whether those forces doing less would be able to increase their numbers, thereby reducing demand on the formal complaints system.

Through this project, we are hoping to drive more consistency in the process too, so that levels of informal handling is commensurate across all forces. We also need to understand how all force PSDs were set up for dealing with informal complaints handling, so your Oversight Liaison will have asked you questions about this in your regular meetings. This feedback will also be included in any reporting on the project to help account for variations in forces.

We hope to be able to share a final version of our findings with all forces in autumn 2025. If you have any questions on this work, please contact [Simon Timms](#), Senior Oversight Liaison.

Complaints relating to handling of covert human intelligence sources

Complaints relating to handling of covert human intelligence sources are quite rare. Recently we had two review cases where no information other than 'Neither Confirm Nor Deny' (NCND) was

provided to the appropriate authority (AA) to make a decision. Consequently the IOPC was not provided with any information to assess the reviews. Both reviews were upheld and sent back for further investigation.

This is a reminder that **if a team within a force holds information that is necessary for the investigation of a police complaint, then the information must be provided to the investigator.**

NCND is not a justification for withholding information from the investigator, the AA or the IOPC. Regulation 35 of the Police (Complaints & Misconduct) Regulations 2020 allows the AA or the IOPC to withhold information from the complainant / interested party in certain circumstances, but that information needs to be available for review by the AA or the IOPC.

The IOPC has the systems and safe-handling methods to deal with covert and sensitive information. If you would like to know how we handle this, please contact your IOPC Oversight Liaison and we can arrange this.

Service user engagement opportunities

The IOPC now has a team dedicated to reviewing and improving the service user experience for all those who come into contact with the IOPC. As a service user of the IOPC, we warmly welcome you to share your views of your experiences. We plan to seek feedback using a range of methods including service user panels, surveys, telephone interviews and more. This work is currently ongoing.

If you have been involved in an IOPC review or investigation, and are interested in getting involved with our work, please email: yourvoice@policeconduct.gov.uk.

Reminder - Professional standards department new starter sessions

These sessions are a useful introduction to the IOPC for any new members of staff joining your teams. They cover the origins of the IOPC, the work we do, tips on complaint handling, and the opportunity to ask questions on any area of our work. They are held remotely on Microsoft Teams and last around 60-90 minutes. If you would like to book onto a future session, we have places available for the following dates:

- Wednesday 15 October 2025
- Thursday 22 January 2026

Please email the names and email addresses of any PSD new starters who would like to attend a session to oversight@policeconduct.gov.uk. Please include first and second choice date preferences and we will do our best to accommodate them.

? Common questions from forces and LPBs

Q: When responding to an allegation of discrimination, can I include comments about a complainant's complaint history in a final report?

A: It's generally not appropriate to consider the complaint history of the complainant unless potential repetition, or abuses, of the complaints system are identified. This may be reviewed early in the process to find out if the complaint has been made before or is already being handled either inside or outside Schedule 3 of the *Police Reform Act (PRA)*.

A complaint handler may wish to consider the complainant's complaint history to see how previous similar, or identical, complaints were handled. A pattern of similar complaints could help the complaint handler decide on the most appropriate method of handling.

For example, repeated complaints may result in an explanation that the matter has been dealt with previously and the circumstances and findings remain the same. Conversely, a pattern of repeated complaints may indicate that the matter was not addressed satisfactorily before and a fresh examination is warranted. A pattern of making repeated complaints should not be used to discredit the complainant, or as a reason in itself to dismiss the live complaint, without providing an explanation of why the previous handling was adequate.

The Home Office Statutory Guidance (paragraph 8.74) is clear. When making case to answer decisions, it is not the credibility of the witness or complainant that is being assessed but the credibility of the witness *account*. This is the approach that should be taken when analysing and weighing up the evidence.

Specifically on discrimination, if you have found that the evidence points away from discrimination, you could acknowledge the complainant has low confidence in the police, but explain that the evidence points away from discrimination in this instance. By doing this, you are acknowledging the complainants view and explaining the context in which you are looking at this particular complaint.

Q: Focus 23 on violence against women and girls (VAWG), states that every victim-survivor of police perpetrated VAWG must be contacted and given an opportunity to record a complaint under the *Police Reform Act 2002*. It goes on to state that victim-survivors must be given the opportunity to fully understand their rights, not only as a victim of a breach of criminal law, but also as a complainant under the *Police Reform Act 2002*. Could you please clarify the relevant section of the legislation that makes this a requirement?

A: Firstly, it is important to keep in mind the wider community context and the national policing priority that is placed on VAWG, when reading our Focus guidance. Therefore, what might be suitable for some complaint and conduct matters, might not be suitable for a complaint or conduct matter involving VAWG. See [Focus issue 23](#) for more details.

It is difficult to imagine a scenario where police perpetrated VAWG would be investigated as misconduct without ever speaking to or providing support and updates to the victim-survivor. Focus guidance (page 27) states that "every victim-survivor of police perpetrated VAWG must be contacted to discuss their report and given the opportunity to record a complaint under the *Police Reform Act 2002* (if they haven't already done so)". The IOPC's view is that this is required by the legislation.

Paragraph 2 (6) of schedule 3 of the *Police Reform Act 2002* states that "[appropriate authorities] shall contact the complainant and seek the complainant's views on how the complaint should be handled".

Para 6.26 of 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.”

Where a member of the public reports a crime against a police officer, they have not only reported a crime, but have also, without necessarily realising it, made an expression of dissatisfaction against a person serving with the police. Therefore, they have made a complaint under the *Police Reform Act 2002*. It is the IOPC’s view that in order to comply with the obligation to seek the complainant’s views on how the complaint should be handled and take reasonable steps to clarify the complainant’s view, forces must at the very least, notify the complainant that they are a complainant under the *Police Reform Act 2002*, explain what their options are and ask what they wish to do.

Given the context mentioned above, the IOPC expects that every police force should respond to reports of police perpetrated VAWG rigorously and impartially. That principle should be applied whether the matter is recorded as a complaint or a conduct matter. It is important that communication with the victim-survivor is clear and transparent. If, having been made aware of their rights as a complainant, the victim-survivor chooses not to pursue their complaint, a conduct matter should be recorded, and they should be treated as an interested party (with their consent).

Corporate news

IOPC Director General comments on annual deaths statistics for 2024/25

The Independent Office for Police Conduct (IOPC) has published its annual report ‘Deaths during or following police contact, Statistics for England and Wales 2024/25.’.

Now in its 21st year, the statistics provide an official record setting out the number of such deaths and the circumstances in which they happened. Figures across the different categories can fluctuate each year, and any conclusions about trends need to be treated with caution.

While there has been a reduction in fatalities in some categories in 2024/25, the figures are broadly in line with the averages over the last decade.

There was a substantial fall in the number of people who had force used against them by police before their deaths in or following custody. Restraint by police featured in less than a third (29%) of these deaths in 2024/25, which is below the average for the last decade (41%). Please note that the force used did not necessarily contribute to the deaths.

Mental ill health, drugs and alcohol remain common factors in deaths in custody and following police contact.

Commenting on the report, IOPC Director General Rachel Watson said:

“Behind every death is a human story - each one is a terrible loss for their family and friends. Our thoughts are with all those impacted.

“Our ambition must be to reduce these deaths wherever possible. We know that policing cannot do this alone and a wider, multi-agency response is required.

“We welcome initiatives led by the National Police Chiefs’ Council, College of Policing and the Independent Advisory Panel on Deaths in Custody aimed at improving policy, training and practice within policing and ensuring that detainees have a safe journey through and after police custody.

“It is disappointing that mental ill health remains a common factor in so many of these deaths. We welcome changes in the Mental Health Bill to end the use of police cells as an appropriate place of safety for those in crisis, as well as the Right Care, Right Person initiative which aims to ensure vulnerable people receive the most appropriate service from the right agency.

“We will continue to work with others to ensure that learning from these deaths is used to inform improvements to policing. Recommendations we and others make will now be collated in a new national database being developed by the College of Policing. This is a positive development which will help ensure learning from cases is built into future police training and guidance.”

Read the [statistical news release](#) and full [report](#) on our website.

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. on our website.

[Statement regarding further child sex abuse reports by Rotherham victim-survivors against former South Yorkshire Police officers](#)

[Kent Police officer sacked for gross misconduct for inappropriate contact with a woman who reported a crime](#)

[Former Met officer would have been sacked for gross misconduct for not investigating firearms incident](#)

[Former Sussex PC to face assault charges for excessive use of force when detaining a man](#)

[Witness appeal as IOPC investigates death of man who was detained by Lancashire Constabulary](#)

[IOPC issues findings of no case to answer after inquest into death of man detained by Notts Police](#)

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

