



# Violence against women and girls:

End-to-end case handling review

February 2024

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## Executive summary

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Violence against women and girls is a concern for policing and the police complaints system. Complainants and victim-survivors continue to tell us about the barriers they face when they come into contact with policing. High-profile distressing cases such as the murder of Sarah Everard and the actions of police officers investigating the murders of Bibaa Henry and Nicole Smallman have led to increased public concern about the police's response in this area. This has damaged public confidence in policing and raised questions about the cultural attitudes towards women and girls in policing more generally.

The IOPC has a role to play in identifying and sharing learning, as well as ensuring the police are held accountable for their approach to complaints and misconduct involving violence against women and girls, including violence perpetrated by members of the police service.

As part of this responsibility, we worked with eight police forces to review a selection of complaint and conduct files. We examined 121 files to review how they handled complaint and conduct matters where violence against women and girls was a factor and whether their responses were appropriate, proportionate and in line with relevant law and guidance. We recognise that there have been many other reviews and enquiries into the police response to violence against women and girls. However, our scope was slightly different, and we have focused on our remit and powers: the police complaints system and the application of the *Police Reform Act 2002*. We share these findings so that all police forces in England and Wales can hold conversations about their own standards and culture in response to violence against women and girls.

The eight forces we worked with showed that in process terms, there are many areas where they are compliant with the legislation, which was encouraging to see. We know that through the increased scrutiny of the police response to violence against women and girls, professional standards departments (the departments that handle police complaint and conduct matters) have introduced new initiatives to raise awareness of the complaint process, provided better training for staff and adopted new processes to respond to complaint and conduct matters. Our findings may reflect this new focus.

We assessed whether police forces were appropriately applying the mandatory referral criteria to violence against women and girls cases and found that police forces were referring the correct cases to the IOPC. We also found that off-duty conduct was treated with the same level of seriousness as conduct that occurred while the officer or staff member was on duty.

However, our findings also demonstrate that even when most processes are followed correctly or go well, those that do not, have a devastating impact on the real people affected. We have identified some good practice, but we have also identified areas where things have gone wrong.

One clear and worrying example of a failure in the system was the lack of identification or recognition of vulnerability by some complaint handlers and no clear responsibility for safeguarding (although this was better when the complainant or victim-survivor is also a police officer). We feel that forces need to be better at working more closely with local support groups, charities and organisations and form partnerships to provide appropriate support for complainants and victim-survivors. Complaint handlers should have better access to information and resources about those local partnerships and the confidence to signpost to additional support.

While we found that most cases were handled reasonably and proportionately by the police, we also found that complaint handlers did not always consider if a pattern of behaviour was emerging with the police suspect or if there are other incidents within their complaints history that might be relevant. This is particularly important in violence against women and girls cases where, for example, predatory behaviour might be emerging in how an officer communicates and interacts with vulnerable people.

There was also a significant lack of cases to review where domestic abuse perpetrated by police officers or staff was a factor. We are concerned that professional standards departments have difficulty accurately identifying these types of cases because of the way they may be recorded or responded to. Treating allegations of domestic abuse by police as complaints or conduct matters from the very outset is essential to ensure they are dealt with appropriately. We will conduct further work with police forces to assess how these reports are recorded and responded to and how complaint and conduct matters are handled.

We have made a series of practical recommendations for policing which we hope will help them continue to make progress in the areas where improvements have been made, and make sensible changes where more work needs to be done.

Women and girls who have experienced violence and / or abuse, along with their advocates, tell us that the complaints process needs to be improved. They describe the negative experience of making a complaint where they feel disbelieved, subjected to language which seeks to blame them, and not being offered the right support. So we know that this review is only part of the picture, and this report sits within our wider work on the experience of women and girls who have accessed the complaints system after being subjected to violence and / or abuse.

As part of this programme we have produced guidance for our staff on **Ending victim blaming in the context of violence against women and girls: Why language, attitudes, and behaviours matter**. This will support staff who come into contact with women and girls who have experienced violence and / or abuse to help them avoid using words which implies, either intentionally or unintentionally, that victim-survivors are partially or wholly responsible for the abuse that has happened to them. We are proud of the guidance and it has been produced for use within all areas of the IOPC, as well as all police forces in England and Wales. The College of Policing and the National Police Chiefs' Council have expressed that they see the guidance as a valuable tool which they are willing to help endorse its use in police

forces. We are pleased to have received very useful feedback through our engagement with stakeholders such as the Suzy Lamplugh Trust and Women's Aid to inform this work.

We also plan to launch a campaign called Know your rights. This is focused on victim-survivors and the organisations who support them, to build awareness of the complaints system and encourage people to access it. We will also deliver the actions made as a result of the investigation into the Centre for Women's Justice super-complaint on domestic abuse perpetrated by police.

I would like to thank Cleveland, Cumbria, Greater Manchester, Gwent, Leicestershire, Merseyside, Staffordshire and Wiltshire Police for their contribution to this project and for allowing us open access to their files. We are extremely grateful to SafeLives and Women's Aid for their advice on the approach to this work and also to SafeLives for delivering training to IOPC staff.

A handwritten signature in black ink, appearing to read 'A. Rowe'.

**Amanda Rowe**  
Director of Operations  
Strategic Lead: Violence Against Women and Girls

## Our work on violence against women and girls

The IOPC has committed to a programme of work focused on violence against women and girls. This has been prioritised in response to increasing public concern about the police response to violence against women and girls and cultural attitudes in policing towards women and girls. A key focus of the work will address actions from the investigation into the Centre for Women's Justice super-complaint on police perpetrated domestic abuse. By focusing on our statutory function, oversight of the police complaints system, we aim to:

- Improve trust and confidence in complainants and those who support them in the police response to violence against women and girls
- Hold the police to account for their response to violence against women and girls
- Identify and share learning to improve policing practice
- Ensure the public understand our role within the police handling of violence against women and girls

## Who we are

The Independent Office for Police Conduct is the police complaints watchdog. We are not the police and are completely independent of them. We set the standards for the police complaints system. We make sure the police are investigating complaints about them properly. We also investigate the most serious and sensitive incidents involving the police ourselves.

Through our work, we hold the police to account when things go wrong, recommend changes to prevent the same mistakes happening again and promote high standards of policing. We use our evidence to drive improvements in police practices for the benefit of the public and the police. This will help achieve our vision for everyone to be able to have trust and confidence in policing.



## Background

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Recent high-profile cases and the subsequent reviews into policing have led to increased public concern about the police's response to violence against women and girls (VAWG). To help to drive improvements in policing, in 2022 the IOPC developed a thematic programme of work to tackle VAWG. This report shares our findings from an end-to-end review of police forces' handling of complaint and conduct matters where VAWG was a factor.

In March 2020, the Centre for Women's Justice (CWJ) submitted a super-complaint alleging that forces were not responding appropriately to cases of domestic abuse involving police officer or police staff suspects. The investigation into the super-complaint found that there are 'systemic deficiencies' in the way some police forces in England and Wales deal with allegations of police perpetrated domestic abuse (PPDA). The investigation identified several recommendations and actions to better protect and support victims and to improve the quality of investigations. The IOPC agreed to carry out a targeted programme of oversight work into the police's handling of PPDA cases. The findings of the CWJ super-complaint investigation have fed into the focus of this wider review into the police's handling of complaint and conduct matters relating to VAWG.

This report is written predominantly for policing stakeholders and therefore contains some reference to technical language. A glossary is included to explain some of the terminology. The case file review and subsequent report aims to improve the policing response to VAWG complaint and conduct matters and is therefore aimed at complaint handling practitioners.

## Methodology

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We reviewed 121 case files across eight police forces. The eight forces were invited to be part of the case handling review based on a number of factors including geographical split, size of force, police complaints data, and other intelligence such as known VAWG initiatives. The forces included in this review were:

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

We'd like to thank these forces for their participation in this project, for the information shared with us and their support to complete the dip sampling work. We wrote a proposal on the scope and methodology of the case handling review including how cases would be identified, what the focus of the review would be and

how data would be collected. We consulted on that proposal with all police forces and local policing bodies. We are also grateful to [SafeLives](#) and [Women's Aid](#) for their advice on the proposal.

Cases were selected by the IOPC from a list provided by the forces which had a VAWG Centurion national factor applied. This is a tag applied to complaint and conduct matters recorded on police systems to provide context to the allegation. The police forces did not have any involvement in the cases selected for review. We completed our file review on site at the selected police forces, looking at case papers either by reviewing Centurion records (the police case management system), or hardcopy, printed papers.

Data was captured on a spreadsheet for analysis purposes.

After each file sampling, we held feedback meetings with the individual forces to share our findings, areas for improvement or positive practice.

## Case criteria

Cases were selected by the IOPC from a list provided by the police force. The force was asked to provide the force reference number, Centurion national factor and a brief summary of the allegations only. The allegation summary allowed cases to be selected to ensure a cross-section of allegation types. No complainant or victim-survivor names were provided. The list of cases requested met the following criteria:

- complaint and conduct matters recorded under the *Police Reform Act 2002* during April 2022 to March 2023
- where at least one of the VAWG Centurion national factors was selected ([see Annex A](#))
- closed cases where an outcome has been decided (this excluded cases waiting for a review\* decision, so as not to prejudice the review outcome)

*\*A review is a method of having a case reconsidered if the person making the complaint is not happy with the outcome of their complaint or the way the police handled it.*

## Accessibility survey

As well as reviewing the police's handling of complaint and conduct matters, we explored with police forces how accessible the police complaints system is to victim-survivors and complainants of VAWG related behaviour. This includes police perpetrated behaviour and dissatisfaction with the way a VAWG case is handled. We were also interested to learn what mechanisms are available to police victims or witnesses to report police-perpetrated conduct matters involving VAWG.

We asked the eight police forces to respond to questions (see Annex B) to help us to understand how the complaints system is accessed by complainants and victim-survivors of VAWG. We also wanted to identify what information is available and collate any initiatives that we can share with forces to promote the complaints system to VAWG specific charities and support groups.

## In scope

The file sampling review concentrated on complaint handling and considered whether complaint and conduct matters are handled appropriately and in line with relevant guidance and laws.

The police response to violence against women and girls is receiving increased scrutiny, including the publication of high-profile cases and a number of reviews and inquiries into the police response. Other regulatory bodies including the College of Policing and His Majesty’s Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS) have also had a focus on VAWG. We know that individual police forces are introducing local initiatives to improve the police response. It is important that the IOPC focused on the areas where we can add most value in line with our role and our powers. It was also key that we had in mind the findings of the CWJ super-complaint on police perpetrated domestic abuse.

| Areas of focus  |  |
|---|--|
| <b>Initial handling decisions</b>   | To review the decisions made at the beginning of a case to include whether it is recorded and how it will be handled.<br><br>Specific focus on the recording of conduct matters where the victim is a police employee. |
| <b>Referral to IOPC</b>   | To assess compliance with, and application of, the mandatory referral criteria (see chapter 9 of the <a href="#">IOPC statutory guidance</a> ).  |
| <b>Contact, updates and information for victim-survivors and complainants</b> | Review the forces engagement and communication with victim-survivors and complainants from the initial contact through to the conclusion of the complaint / conduct matter.  |
| <b>Quality of handling / investigation</b>                                    | To consider whether the decisions and actions taken to handle the complaint or conduct matter are reasonable and proportionate to the allegations made. To review whether appropriate lines of enquiry are pursued.    |
| <b>Outcomes</b>   | To review whether outcomes are reasonable and proportionate and that matters are handled with  |

|                 |   |
|-----------------|---|
|                 | sufficient severity. To assess whether the police response is impartial and robust and whether there is consistency across forces in decision making. |
| <b>Language</b> | To assess whether forces avoid victim-blaming language and are sensitive to the needs of victim-survivors and complainants.                           |

## Out of scope

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This review does not consider the following:

- Cases that fall outside of the Centurion national factors definition of VAWG i.e. male victims ([see annex A](#)).
- VAWG offences where there is no complaint or conduct matter against the police.
- Open cases where no decision has been made.
- Closed cases that are within the review period or where a review has been submitted, but a decision has not been made.
- The handling of, or decision making at, disciplinary proceedings that follow a complaint or conduct matter involving VAWG.
- Intersections of VAWG with other protected characteristics – we acknowledge that experiences of VAWG and the police response may differ for different groups and communities. To properly review intersectionality would require a much larger dip sample, involving a wider range of police forces and subject matter experts. The constraints of this project did not allow for this wider work and there was a concern that the scope of the project could become too broad. Also, the number of cases with sufficient information recorded on demographics and protected characteristics is too small to draw any meaningful conclusions.

## Limitations

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The IOPC Oversight team (the team conducting the sampling) has knowledge and experience in complaint handling and application of the *Police Reform Act 2022*. Subject matter experts, both within the IOPC and outside, contributed to the planning and focus of the file sampling and gave advice where needed.

The review focused on key aspects of VAWG complaint and conduct matter handling as recorded on Centurion. Any information relevant to these cases held elsewhere on other police systems (such as crime files or personnel records), were not

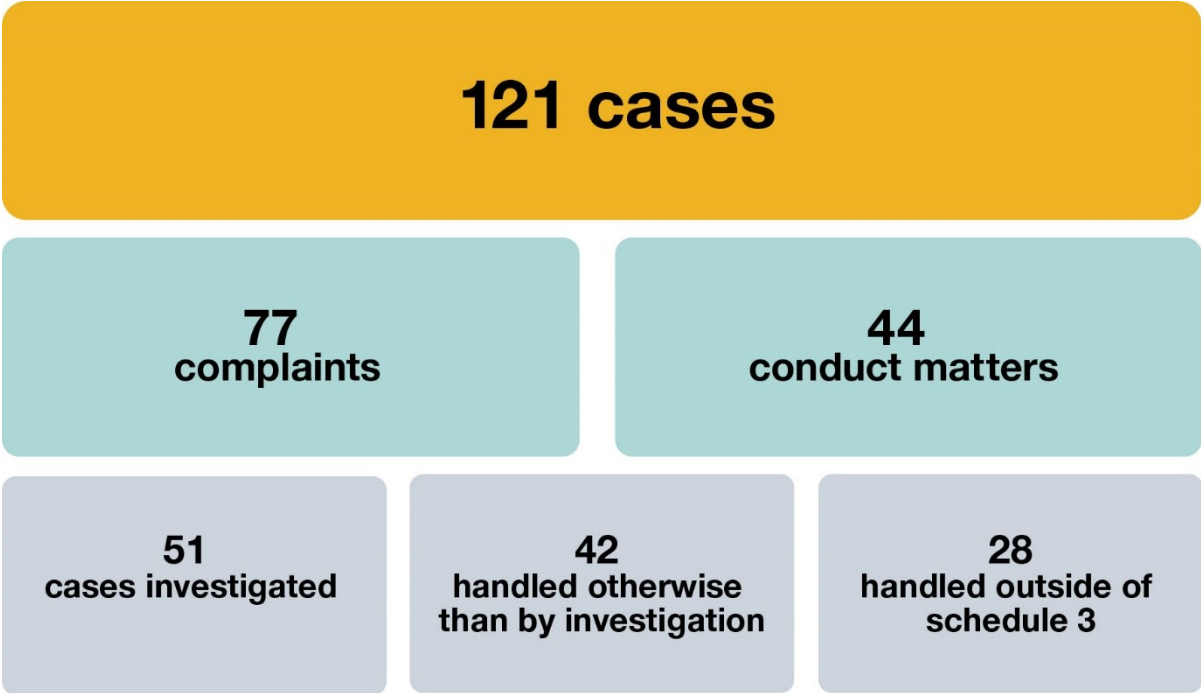
reviewed. In a number of cases, insufficient information was available, either through Centurion record keeping or the printed files, to make an informed assessment in some of the areas reviewed. This has led to 'unable to decide' answers.

When selecting cases for review, we asked police forces to provide information about the allegation category. This was to allow a range of different case types to form part of the sample. The ambition for this work was to sample around 30% of the total cases involving police perpetrated domestic abuse. Disappointingly, through the methodology used, there was insufficient PPDA cases available to select from. We sampled just 11 cases where PPDA was a factor. To satisfy the actions arising from the CWJ super-complaint, the IOPC is considering what further work might be possible to identify and review PPDA cases. This further work will form part of a separate sub-project and be reported separately to this report to avoid delaying the findings of this case file review.

## Data collected

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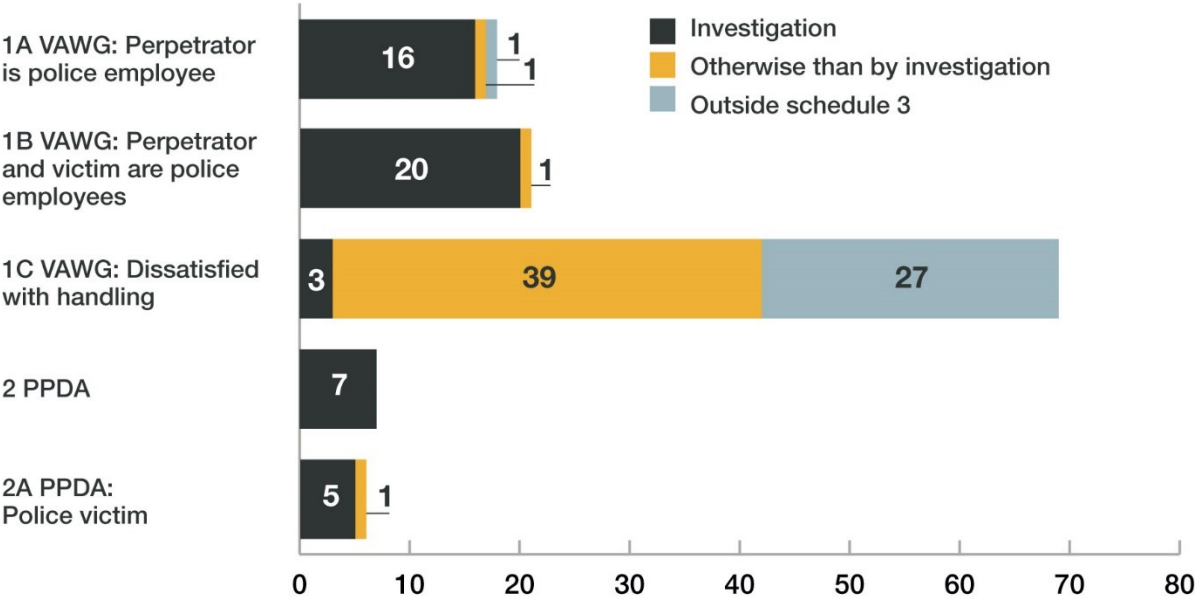
The following case files were reviewed:



See [Annex C](#) for explanation of investigation, handling otherwise than by investigation (OTBI) and handling outside of schedule 3.

Of the 121 cases reviewed, the type of VAWG matter is broken down by the following factors (as applied by the IOPC):

### Case types per factor



See [Annex D](#) for an explanation of the factors applied by the IOPC.

## Findings

### Centurion national factors

On reviewing the cases selected with a VAWG centurion national factor, it is apparent that police forces are over-applying the VAWG factors. We reviewed several cases where the VAWG centurion national factor was applied to circumstances and allegations that didn't meet the definition of VAWG. For example, any use of force complaint made by a female. These cases did not form part of the sample and were removed.

The purpose of the VAWG Centurion national factors is to capture scenarios that disproportionately affect women and girls, not any complaint or allegation made by a female. Inaccurate use of VAWG factors was found in all eight of the forces sampled and therefore, is likely to represent a national issue with the understanding of the VAWG definition and application of the factors. More guidance and case examples are needed to support forces to accurately apply the factors. This would lead to more consistent and reliable data sources.

We updated the IOPC [Focus guidance](#) on data capture in September 2023 to include more VAWG examples and clarify which cases would not meet the VAWG factors definition.

## Recommendation 1

The National Police Chief's Council (NPCC) provide guidance to all police forces in England and Wales on the definition and correct application of the VAWG Centurion national factors.

## Lack of police perpetrated domestic abuse data

As mentioned in the 'Limitations' section above, there was a significant lack of PPDA cases available to select and sample. When we asked police forces why this might be, we received a very mixed response including:

- cases might be dealt with outside of professional standards departments in specialist units, such as the public protection unit.
- cases might be recorded on other police systems such as crime systems.
- cases might be progressed as a criminal matter initially and then any conduct matters would be considered after that, taking into account the criminal decision.
- cases could be recorded as a miscellaneous (MI) case reference which means the matter is not recorded as a complaint or conduct matter from the outset, while enquiries are made.

It is concerning that professional standards departments are unable to provide an accurate picture of the number of PPDA cases reported within their force each year. We know from research into the CWJ super-complaint that there are PPDA cases in existence. However, it is difficult to identify those cases in a systemic and accurate way. The CWJ super-complaint found that “the initial handling of PPDA allegations as allegations of police misconduct was found to be generally poor in the cases and data that we reviewed. Too often forces failed to accurately treat PPDA allegations as police complaints and conduct matters”. They also found weaknesses in data recording and collection methods for PPDA. Based on our findings, and subsequent discussions with forces, it would seem things have not improved enough. Treating PPDA allegations as complaints or conduct matters from the very outset is essential to ensuring they are dealt with appropriately. Wherever possible, criminal matters and conduct matters should be considered in parallel, but where this is not possible, police forces should still ensure that conduct matters are properly recorded from the start. Ensuring that forces refer PPDA reports to professional standards departments and record them on Centurion from the outset also allows for accurate data reporting.

We are aware that a new PPDA Centurion national factor will soon be introduced which will allow cases recorded on Centurion to be identified and extracted more easily. However, this will not fully solve the problem if cases do not make their way to professional standards departments in the first instance or if they are not recorded on Centurion as a complaint or conduct matter from the outset.

## Recommendation 2

The IOPC will begin a separate project focusing on how police forces respond to PPDA reports. This will include how reports of PPDA are identified and recorded, through to how complaint and conduct matters are handled. The work will build on what we know from the CWJ super-complaint report and will focus on identifying solutions to improve the policing response to PPDA.

## Complaint versus conduct

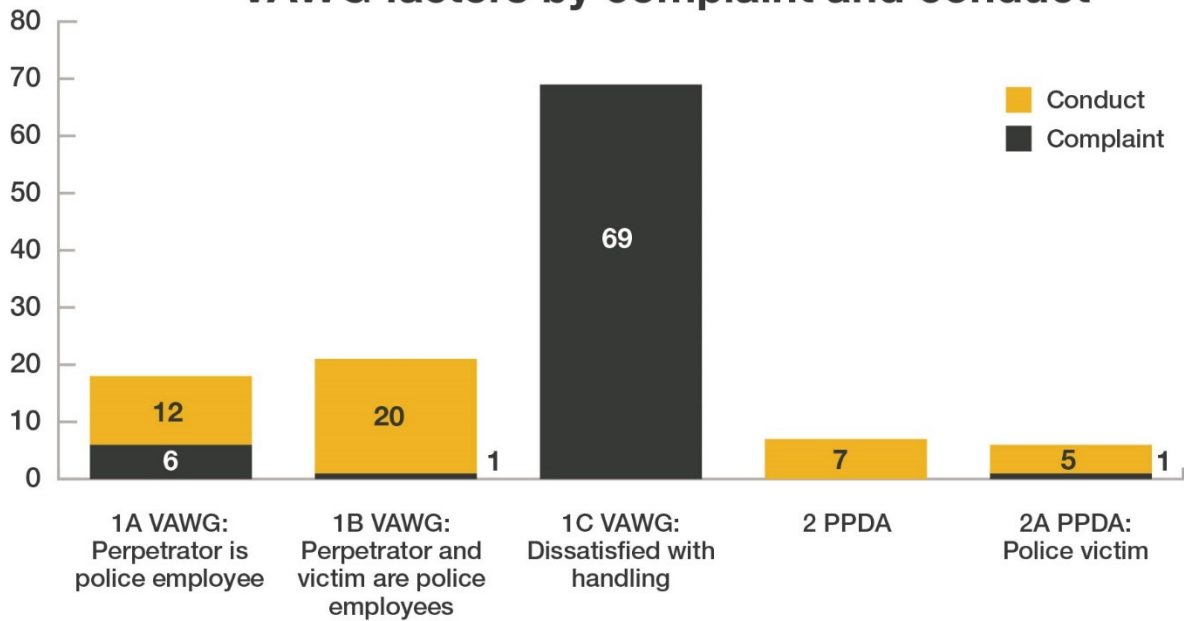
Our file review found that conduct matters (behaviour that is not the subject of a formal complaint) are generally treated more seriously than complaint matters. Conduct matter investigations tend to be swift and have good quality outcomes. This could be indicative of the fact that for a matter to be recorded as a recordable conduct matter, there must be an indication that a person serving with the police may have committed a crime or behaved in a manner that would justify disciplinary proceedings. Therefore, there is already some evidence of wrongdoing for a conduct matter to be recorded. For complaints, *all* expressions of dissatisfaction must be logged.

When we spoke to the police forces involved, they generally have a zero-tolerance approach to many VAWG related conduct matters and were keen to remove or discipline police perpetrators of VAWG swiftly and effectively.

The difference in approach to conduct matters also reflects the type of behaviour being examined. Most of the complaint matters we reviewed were a complaint of dissatisfaction with the handling of a VAWG related matter. Many of these were complaints about a lack of updates or information on an ongoing investigation. These are the types of matters that can easily be resolved without protracted enquiries and would not lead to a disciplinary outcome. For the conduct matters we reviewed, the majority were police perpetrated VAWG or police perpetrated domestic abuse which are more likely, if proven, to lead to robust outcomes such as disciplinary proceedings.



## VAWG factors by complaint and conduct



We found that the decisions made by police forces at the conclusion of handling was appropriate, whether that be for complaint or conduct matters. Therefore, the difference in handling of conduct matters reflects the way the system is designed and the serious nature of conduct matters. It is positive to see that overall, police forces are applying a robust and impartial approach to conduct matters, which tend to include police perpetrated VAWG and domestic abuse.

## Early engagement

Where a complaint is made or conduct matter recorded, the IOPC expects police forces to engage early with complainants and victim-survivors to understand the nature of the allegation, how the complainant / victim-survivor would like to be informed about the case and to discuss how the matter should be handled. This is especially important in VAWG cases where the complainant / victim-survivor might also be vulnerable. Good engagement from the outset can ensure a complainant / victim-survivor understands the complaints process, their expectations are managed, and they are more likely to participate in the process until its conclusion.

In the cases we sampled, there is evidence that forces are making early contact with complainants/victim-survivors. Of 113 cases with a complainant / victim-survivor, contact was successful in 71% of cases (80) and was attempted but was unsuccessful in 11% (12). There were 7 cases where we were unable to decide if any contact was attempted and 14 cases where contact wasn't attempted. Where contact wasn't made with the complainant / victim-survivor, there were just four cases where we decided that this was not reasonable. In some cases, the information available showed that the complainant / victim-survivor made a report but requested not to be contacted again.

Within the initial engagement with a complainant / victim-survivor, the IOPC expects police forces to explain the complaints process so that a complainant / victim-survivor is fully informed about what to expect and is involved in decisions about how the matter should be handled. In those cases where there was a complainant / victim-survivor who wished to be engaged with, we found that the complaints process was explained well or adequately in almost a third of cases (32 of 106) and was not explained well in 22% of cases (22 of 106). In almost half of the cases (51 of 106), it was not possible to decide. This was mostly due to record keeping and the information recorded on the file. In some cases, police forces may have had initial discussions with complainants / victim-survivors over the telephone and while there may be a brief note of the call, it's not possible to decide from the telephone call notes whether the process was explained well.

## Police victims

Where a police victim works in the same police force as the person whose conduct is in question (under the direction and control of the same chief officer) they are unable to make a complaint under the *Police Reform Act 2002*. This does not mean that they cannot raise a conduct matter or that they should not be kept informed of the progress of that investigation. The Centre for Women's Justice super-complaint found that forces rarely appeared to treat police victims as 'interested persons' in PPDA cases. This would give them similar rights to a complainant to be kept informed of the progress of the investigation. In the CWJ victim survey, only one of the 45 police respondents said the police treated them primarily as an interested person.

Of the 22 cases where the victim-survivor was member of police, we found they were treated as an interested person in 32% of cases (7). It was not possible to decide if the force had treated the police victim as an interested person in 50% of cases (11) and they were not in 18% (4). This demonstrates some improvement from the findings of the CWJ super-complaint, although we acknowledged that there is still some progress to be made. Of the 50% of cases where it was not possible to decide, the police-victims may have been suitably informed about the progress of the investigation, but it was not possible to decide based on the case papers available to us. Through the feedback discussions with the police forces, the IOPC was satisfied that forces had good awareness of the requirement to treat police victims as interested persons and had processes in place to ensure police victims were updated. The IOPC reminded forces of this requirement in our monthly Oversight newsletter and will continue to have conversations with forces where we have concerns that this is not happening.

## Vulnerability and safeguarding

Owing to the nature of complaint and conduct matters involving a VAWG factor, we expect that complainants and victim-survivors will often be vulnerable or may require some form of support. From the data available, we are not persuaded that complainant / victim-survivor care and safety is always given due consideration, or

that there is clear decision making for who will be responsible for complainant / victim-survivor wellbeing.

Of the cases handled via an investigation or otherwise than by investigation (OTBI) (88 cases), we found that over half (61%) of the complainants / victim survivors were not considered to be vulnerable. A quarter were considered to be vulnerable and in the remaining cases, the forces' assessment wasn't clear. We found 14 cases where the complainant / victim-survivor should have been considered vulnerable and was not, and a further 11 cases where it wasn't possible to decide based on the information available.

In most cases, there was no clear responsibility for victim care. We would expect the complaint handler to have conversations with the complainant / victim-survivor about their needs and to signpost them to support agencies, where relevant. Some forces have good partnerships in place with local charities or organisations where complainants / victim-survivors might receive support, either because of an ongoing VAWG related matter or support through the course of making a complaint and the police investigation. In certain cases, the police force will take some responsibility for victim care, such as through its public protection unit, independent domestic violence advocate (IDVA) or independent sexual violence advocate (ISVA). Where this happens, it should be agreed and clearly documented on the file. We found little evidence of this happening.

Complaint handlers are not expected to become specialists in vulnerability support. However, we do expect that complainant / victim-survivor care and wellbeing are given due consideration and that police forces are aware of local provisions so they can signpost or refer people to these services. Examples include referral to independent victim support, telling victim-survivors about their victim rights, protective measures to safeguard an individual from the suspect, referral to an IDVA or ISVA, or referral to a multi-agency risk assessment conference (MARAC).

In one case of police perpetrated domestic abuse, the police perpetrator was swiftly arrested on suspicion of assault and coercive and controlling behaviour. The victim-survivor was identified as vulnerable at the scene and plans were put in place to safeguard her mental health. The victim-survivor was referred to a local mental health support agency. Reference was also made to the [victims code of practice](#) (focusing on victims' rights) being applied.

A member of the public reported to the police a domestic abuse incident involving her ex-partner who is a serving police officer. The ex-partner entered her home, verbally abused her and spat at her. The ex-partner could not be found, despite extensive enquiries. The complainant later made a complaint to the police that, despite being told that security measures would be put in place at her home, nothing was done and she had not received any update since the incident.

The complaint was handled otherwise than by investigation. The complaint handler arranged for a local victim support service to change the locks and install window alarms. A local charity contacted the complainant and provided information about a local refuge and other services. A risk assessment was completed with the victim, which resulted in a medium risk score. Usually, a monitored alarm is fitted in high-risk cases, but the complaint handler requested that although medium risk, a portable alarm was sent to the complainant. The complaint handler also offered for a crime prevention officer to visit her to provide advice.

### **Recommendation 3**

Police forces should work with local support groups, charities and organisations to form partnerships to provide appropriate support. Complaint handlers should have information and resources available to them so they know what those local partnerships are.

### **Recommendation 4**

Where a VAWG complaint or conduct matter is raised, complaint handlers should consider the possible vulnerabilities associated with being a victim-survivor or complainant of a VAWG matter. Complaint handlers should consider what support might be required and discuss the options with the victim-survivor / complainant. Responsibility for victim-survivor care should be documented on the file.

## **Police victim welfare**

Police victims face unique barriers when reporting police perpetrated VAWG. Police victims may fear that reporting a police perpetrator could impact negatively on their credibility or career. It is essential that a police victim is properly supported in making a report of VAWG.

For police victims, we found that vulnerability is identified more often than for members of the public making a complaint and welfare at work is also given

consideration. We found several examples of police victims of police perpetrated domestic abuse being supported through the various workplace services. In cases where the police victim and perpetrator work in the same police force, we found examples of consideration given to support by altering shift patterns to avoid the victim and perpetrator working on the same shift or moving one of the police employees to a different department. Welfare provisions were put in place with line managers and supervisors. In some cases, an employee assistance programme was used to provide support services to the police victim. While these are all positive examples of supporting police victims, we acknowledge there is room for improvement and not every case we reviewed was able to show good support for police victims.

Police forces should make support of police victims of VAWG a priority. This means ensuring that complaint handlers identify vulnerability early and signpost them to the proper support services.

## Language

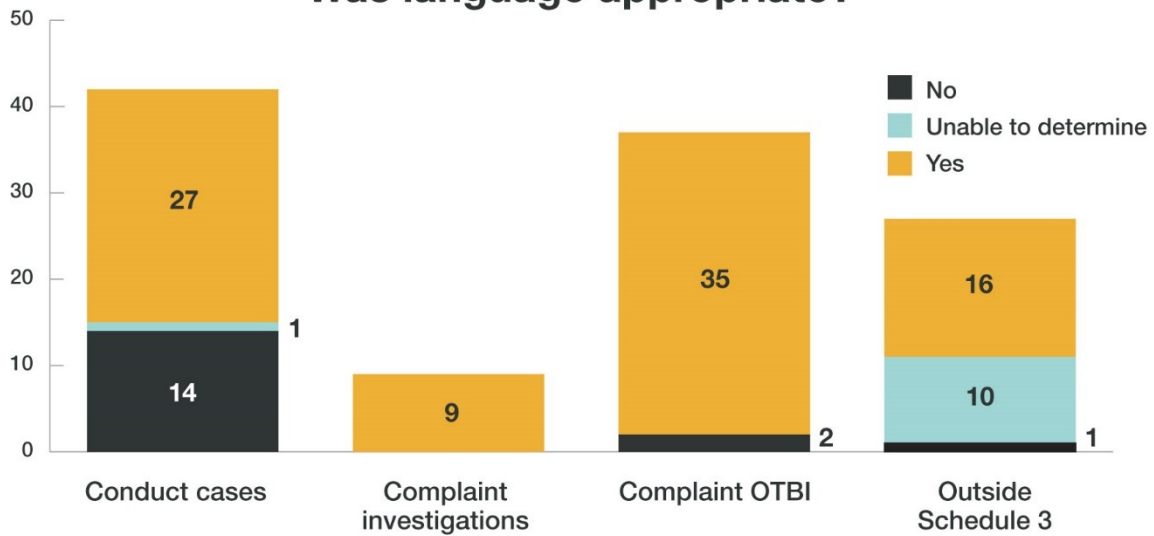
We reviewed the language used by complaint handlers when communicating with complainants and victim-survivors to establish if the contact was sensitive and if there was any evidence of victim-blaming. Victim-blaming can often be unconscious and based on commonly held beliefs or even sexism or misogyny. Victim blaming language, attitudes, and behaviours shift the blame to the victim-survivor, when it is the perpetrator who should be held accountable. Communicating in a way that is free from victim-blaming improves the confidence of victim-survivors in the process and avoids further victimisation. We looked for evidence of:

- language that focused on the actions of the victim, rather than the perpetrator
- comments and inferences around a lack of engagement from the complainant / victim-survivor (they might not be able to engage due to a variety of complex circumstances including fear)
- reference to a victim-survivor not leaving an abusive relationship so an inference that the abuse is not as serious as described.
- comments about the length of time it took a complainant / victim-survivor to report a matter, thereby questioning the validity of the report
- language that minimises, trivialises or dismisses behaviour or the impact of the harm a person has encountered for example 'low level' or 'just abusive comments'

### **We acknowledge that victim-blaming language can take many other forms.**

In the majority of cases we reviewed, we found police forces are communicating sensitively with complainants / victim-survivors during complaint handling and we found little evidence of victim-blaming language (as described above).

## Was language appropriate?



In one example of victim-blaming language, rather than focusing on the actions of the police perpetrator, the complaint handler documented the inexperience and age of the police victim which was not relevant. The focus was shifted to imply that the culture is to be expected:

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***"less experienced, younger and more naive member of the department....working on a shift of colleagues with established working relationships that are accustomed to the office banter and culture that exists"***

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Other examples of inappropriate language included ***'they became intimate'*** when referring to a report of sexual assault which implies consent and ***'she seemed really keen'*** when discussing CCTV images with a police perpetrator during interview.

## Initial handling decisions

We looked at the initial decisions made by police forces which decide how a complaint or conduct matter will be handled. This includes whether the matter should be recorded under schedule 3 of the *Police Reform Act 2002* and if it should be handled otherwise than by investigation or investigated. Complaints can be handled outside of the requirements of schedule 3 where a prompt and simple resolution is anticipated such as providing an explanation. Where matters are recorded under schedule 3, the legislation sets out that certain complaints must be investigated. Those that don't require investigation can be handled otherwise than by investigation (OTBI) where complaint handlers can be creative about what resolution might be reasonable. See [Annex C](#) for more details.

We found that most of the forces apply the initial threshold tests and choose to handle complaints in an appropriate way. Of the 28 cases that were handled outside

of schedule 3, we found four cases (14%) where we disagreed with that method of handling. Similarly, of the 42 cases handled OTBI, we found four that should have been investigated (10%).

## **Application of the mandatory referral criteria**

Once a complaint or conduct matter is recorded under schedule 3, the appropriate authority must make an assessment of whether the matter should be referred to the IOPC. We found that forces correctly applied the mandatory referral criteria to the VAWG cases in the sample. Of the 94 cases that were recorded under schedule 3, 13% (12 cases) were referred to the IOPC, or 23% when looking at investigation cases alone. Of those cases that were not referred, we found one case that required referral to the IOPC. This was a complaint about the lack of investigation into an allegation of sexual assault.

This is in contrast to the conclusions of the CWJ super-complaint which found evidence of a significant failure to refer PPDA cases to the IOPC. Since publication of the CWJ super-complaint report in June 2022, and alongside the increased national spotlight on the police response to VAWG, police forces have worked to introduce new initiatives and improvements to processes and standards. Our findings on the application of the mandatory referral criteria in VAWG cases could be a reflection of such improvements. However, we acknowledge that the number of PPDA cases included in this sample is small and therefore a direct comparison to the CWJ super-complaint findings is not possible.

## **Off-duty conduct**

Police officers are subject to the standards of professional behaviour, even when off duty. This means police officers should not behave in a manner that discredits the police service or undermines public confidence at any time. However, these restrictions must be balanced against the right to a private life. The CWJ super-complaint found that reports about domestic abuse, where the behaviour is likely to occur off duty, were not always correctly identified as potential misconduct. This included undue weight being placed on the fact a matter had occurred off duty when making a decision as to whether an officer had a case to answer for misconduct or gross misconduct.

We looked at whether off duty conduct affected the decisions made at the outset about how a case should be handled and if off duty conduct had an impact on the assessment of seriousness. We concluded that forces are assessing off duty conduct with the same level of seriousness. We found off duty conduct was present in 32 of the 121 cases (26%). It was not possible to decide if the conduct was on or off-duty in two cases due to limited information about the allegations. Of those cases where conduct was off duty, we concluded that off duty conduct was assessed with the same level of seriousness in 29 cases (91%). In the remaining three cases, we were unable to decide if off duty conduct had affected the handling.

We acknowledge that we reviewed cases that had come to the attention of the professional standards department (PSD) and where a complaint or conduct matter had been logged. There is the possibility that off duty conduct reported outside of the PSD system – for example, to local managers - could have an impact on the initial consideration of whether a report of VAWG is deemed a possible complaint or conduct matter and therefore referred (or not) to PSD for initial assessment.

## **Conflict of interest**

We know that for victim-survivors of police perpetrated VAWG, there can be many barriers to reporting. This includes the fear of not being believed, or that the police will not conduct an impartial investigation due to a belief (real or perceived) that the police will ‘protect their own’. This belief might be heightened in cases where the victim is also a police officer. It is crucial the police demonstrate that their response to reports of police perpetrated VAWG is impartial. One way to do this is to show that the appointed complaint handler has no previous connections to the subject of the investigation. Prior connections between colleagues within a police force will likely undermine confidence in the police response to the complaint or conduct matter.

We found that most of the police forces didn’t have clear declarations around conflicts of interest. The forces in the sample told us they had processes in place which relied upon the complaint handler flagging when a conflict was present, but there were no declarations made as standard practice in all cases, only where a conflict was present. This risks conflict of interest considerations being missed, or it being unclear if consideration was applied. Without a formal declaration of conflict, it is not possible to say with any certainty if the complaint handler has any prior connection to the person subject of investigation, or even the victim-survivor / complainant.

In one force, we found positive practice where complaint handlers answer conflict of interest questions on an activity log as standard, through a series of tick boxes. The activity log showed whether a conflict was present and if the complaint handler was suitable to respond to the complaint or conduct matter. Going through this process, even where negative responses are recorded, ensures that any conflict is given due consideration and the audit trail of that consideration is clear. Importantly, it demonstrates to the victim-survivor / complainant that the complaint handler is suitable.



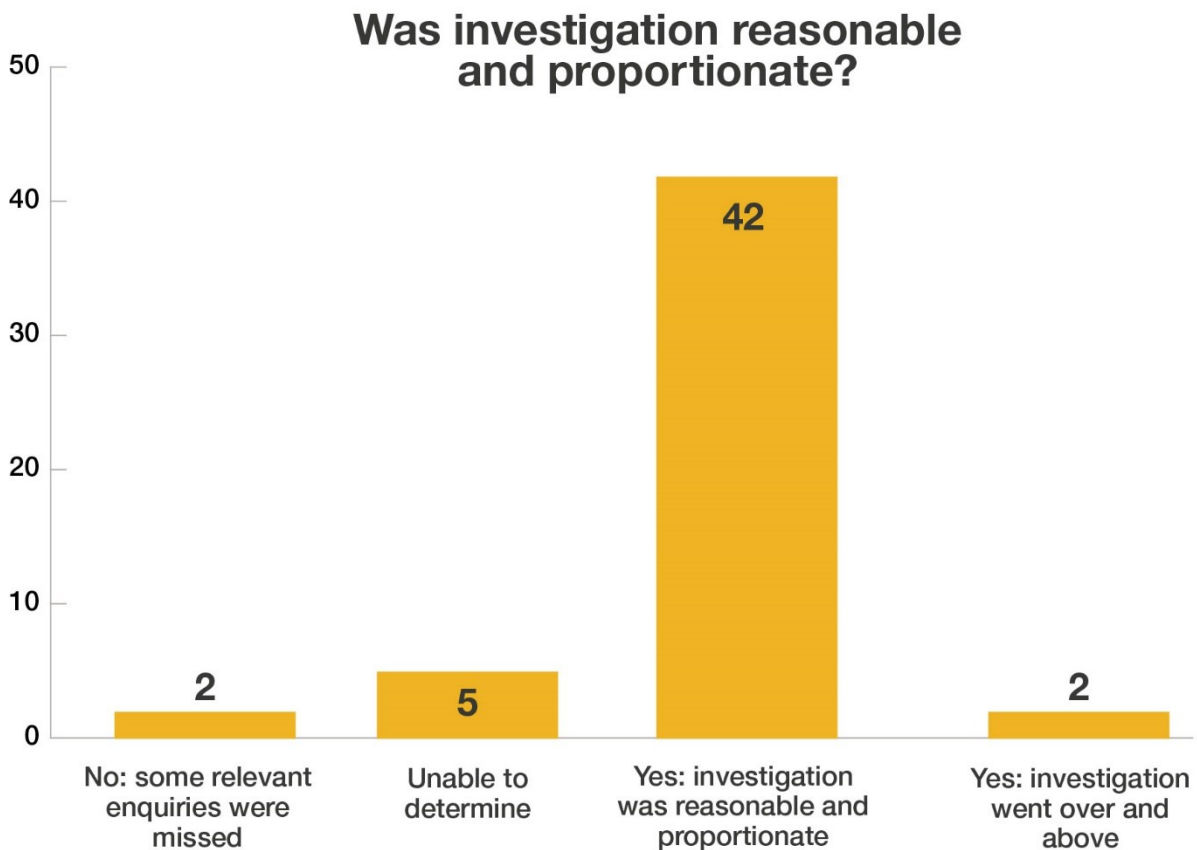
## Recommendation 5

Police forces should include conflict of interest declaration records as standard on all VAWG cases to show that they have considered any possible conflicts and to reassure victim-survivors / complainants of the suitability of the appointed complaint handler.

## Investigations

The majority (48 of 51) of the cases that were investigated related to police perpetrated VAWG or police perpetrated domestic abuse. We would expect these types of cases to be subject to a formal investigation. Three cases related to dissatisfaction with the handling of a VAWG matter. Overall, we found that investigations are being handled well, with reasonable and proportionate enquiries being made and in a timely manner.

### Reasonable and proportionate



For the cases that were subject to an investigation (51), we assessed whether the investigation was reasonable and proportionate. This involved consideration of whether forces pursued suitable enquiries and obtained relevant evidence. We found that in most cases (86%), police forces conduct investigations into VAWG matters that we considered were reasonable and proportionate. This was the case whether the matter was a complaint or conduct matter. When looking at the difference

between the handling of complaint and conduct matters, we found that 89% of complaint cases (8 out of 9) and 86% of conduct matters (36 out of 42) were handled reasonably and proportionately.

In one case, we found evidence of the police force pursuing a thorough investigation and having good engagement with the victim-survivor. During a police visit to a concern for welfare, the victim-survivor disclosed historical domestic abuse dating back 15 years by her ex-partner, a serving police officer. The victim-survivor did not want to make a complaint or support an investigation. Despite this, the police handled the report as a criminal matter and a conduct matter against the police officer. The complaint handler made positive attempts to build a rapport with the victim-survivor, respecting her wishes about how she wished to be contacted and engaged. This included giving the victim-survivor time to think about whether she wished to support an investigation. The victim-survivor provided additional information, but chose not to make a statement. A risk assessment was completed with the victim to ensure her safety.

Despite limited evidence available, the police force treated the matter seriously. The officer subject of the allegation gave a statement. Due to limited evidence available, the force concluded that no further action would be taken. However, the force reminded the victim-survivor that she could contact them to make a statement at any point and they would listen to her account if she changed her mind.

We found another case of positive practice on a report of sexual harassment that was handled seriously and thoroughly investigated. A member of police staff reported inappropriate comments made to her by a police officer about her outfit. A statement was taken from the police victim and the matter was categorised as gross misconduct. The police force reviewed the officer's complaints history to see if there was a pattern of behavior with any other incidents reported. None were found. The police officer was interviewed and accounts were obtained from witnesses. During his interview, the police officer reflected on how his comments were perceived. The officer was referred to the reflective practice review process (RPRP). This process provides the opportunity to reflect on actions and behaviour, and promotes learning and improvement. It was clear in this investigation that the police force treated the report seriously and conducted an impartial investigation.

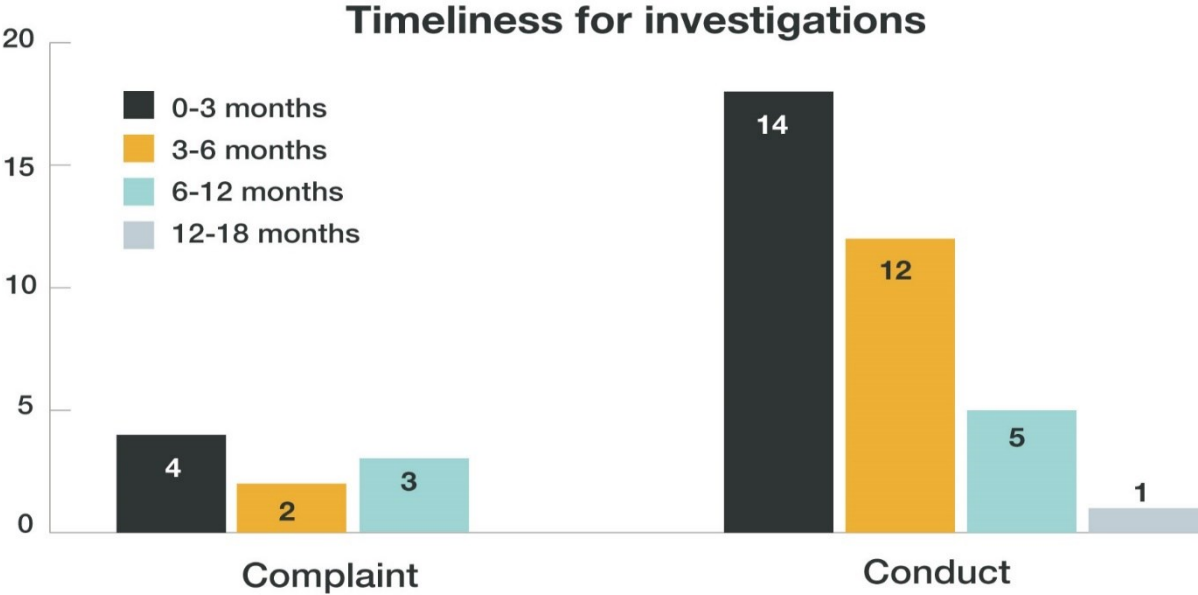
## Patterns of behaviour

When a complaint or conduct matter comes to light, the IOPC expects police forces to consider if there is a pattern of behaviour emerging with the police suspect or if there are other incidents within their complaints history that might be relevant. This is particularly important in VAWG cases where, for example, predatory behaviour might be emerging in how an officer communicates and interacts with vulnerable people. There may be instances where behaviour on its own might not initially appear concerning, such as friendly text messages to a victim of crime, but as a pattern, the behaviour could amount to an abuse of position for a sexual purpose (APSP). Not only does assessing patterns of behaviour strengthen the evidence available, it can also safeguard other possible victims of a similar behaviour, such as vulnerable victims the officer might come into contact with or new personal relationships. Where a police victim makes a complaint of unwanted behaviour in the workplace, it's important to consider if similar allegations have been made against the police suspect or indeed, if others working alongside the police suspect require protection or support.

We found that police forces do not consider patterns of behaviour in cases where it would be relevant to do so. It was evident that a pattern of behaviour was considered in just 35% of cases. Where a pattern of behaviour was considered, we found examples of the complaint handler considering a history of domestic abuse which formed a large part of initial decision making. In other APSP cases, mobile phone and social media accounts were reviewed to decide if there were other incidents of inappropriate contact with vulnerable victims. And for an internal conduct matter, all members of a department were given an opportunity to raise concerns about unwanted behaviour, allowing the complaint handler to include any patterns into their evidential considerations.

In one case of unwanted sexual behaviour at work, previous reported behaviour against the police suspect was taken into consideration. A female colleague reported that a male officer made her feel uncomfortable by staring at her and by the tone of his conversations. There were previous reports of this behaviour where the male officer had accepted his behaviour made women feel uncomfortable. He was placed on an informal 12-month action plan and the unwanted behaviour stopped. Once the plan ended, the behaviour started again. This was considered in the decision making of the recent case and led to robust formal intervention and management of his behaviour.

# Timeliness



Within the cases reviewed, we found that VAWG investigations are being handled in a timely manner and quicker than the national average for all complaint investigations. Almost half (49%) of the investigations reviewed were concluded within 0-3 months. The national average for complaint investigations in the same period (2022-2023) is 5 months or 159 days. We concluded that the timescale for investigations was proportionate in 85% of cases. One conduct matter took 12 to 18 months to investigate, and we decided this was appropriate given the lengthy enquiries needed for an abuse of position for a sexual purpose investigation and the time the matter spent with the force’s legal team. In some cases, it was difficult to decide if the time taken was proportionate as it was unclear what action was taken from the records available.

One case provided an excellent example of where swift action can be taken to respond to inappropriate behaviour in a way that instils confidence.

Eight female police officers were having lunch in the canteen. Two male police staff members were watching and staring at them in a way that made them feel uncomfortable. The males were talking and laughing in manner that made it clear they were talking about the females. The behaviour was also witnessed towards other passing females. The female officers reported the inappropriate behaviour.

Within **one hour**, an investigating officer from PSD spoke to the police victims and took their accounts. The same afternoon, information was referred to the force’s human resources department (the process for members of police staff). The outcome of the report was reflective practice for the male staff members.

## Outcomes

At the conclusion of a local investigation, the appropriate authority must decide on the outcome of the complaint or conduct matter and what action (if any) should be taken. Those outcomes will be different depending on whether the investigation was subject to special procedures or not. Special procedures apply for any investigation into a recordable conduct matter, and any complaint where there is an indication that a police employee has committed a criminal offence or behaved in a manner that would justify criminal proceedings.

For investigations subject to special procedures, a decision should be made about whether the police employee has a case to answer for misconduct, gross misconduct or has no case to answer. For non-special procedure investigations, a decision should be made as about whether the service provided by the police was acceptable or not acceptable. It could be concluded that it was not possible to decide if the service was acceptable. This should be relied upon in limited circumstances.

For the 48 investigations subject to special procedures, the following case to answer decisions were made:

| <b>Case to answer decision</b> | <b>Conduct matter<br/>42 cases</b> | <b>Complaints<br/>5 cases</b> |
|--------------------------------|------------------------------------|-------------------------------|
| <b>Gross misconduct</b>        | 5                                  | 1                             |
| <b>Misconduct</b>              | 5                                  |                               |
| <b>No case to answer</b>       | 26                                 | 4                             |
| <b>No decision made</b>        | 6*                                 |                               |

\* Six cases had no case to answer decisions made because the investigation ended before a decision was made. This was due to a number of reasons such as the matter being closed as no offences were disclosed or other employment processes for probationary officers took precedence. In two cases, the investigation was still live and a decision had not been made. While the case selection criteria was for cases that were closed, we fully reviewed these cases when it became apparent that the investigations were still live. We chose to include the relevant information we had reviewed, being unable to comment only on the outcome decisions made.

As explained above, all conduct matters will have a case to answer decision.

We didn't find any cases where we disagreed with the case to answer decision. We agreed with the case to answer decision in all five of the complaint cases. For the conduct matters, we agreed with the case to answer decision in 74% (31 out of 42) of cases. In the remaining cases, we were unable to make a decision due to a number

of factors including insufficient reasons given for the decision or insufficient information about the enquiries conducted to reach the decision.

For the 11 cases where there was a case to answer for misconduct or gross misconduct, six cases went to a misconduct hearing, three resulted in a misconduct meeting and it was unclear in two cases.

For those that resulted in a misconduct hearing; two hearings hadn't taken place, in two cases the police staff member resigned before the hearing could take place and in one case, the officer was dismissed. This was a case where a police sergeant made sexual comments to a junior officer within the team. The inappropriate behaviour was corroborated by multiple witnesses, with evidence to suggest that the behaviour continued even after being challenged. The panel in the misconduct hearing made a decision to dismiss the officer based on the severity of the behaviour and its impact on the police victim. The police force took the report seriously and demonstrated an impartial approach to removing officers that have sexist or misogynistic attitudes.

We found four conduct cases where the outcome was inappropriate. In all four cases, we concluded that reflective practice would have been suitable for the employee concerned.

In one conduct case, the police force demonstrated a good cultural response to the report of inappropriate behaviour by a colleague by documenting in the report:

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***"Staff should be able to come to work and have an environment free from inappropriate comments that make them feel uncomfortable. We are striving to make the workplace inclusive of all and education plays a part"***

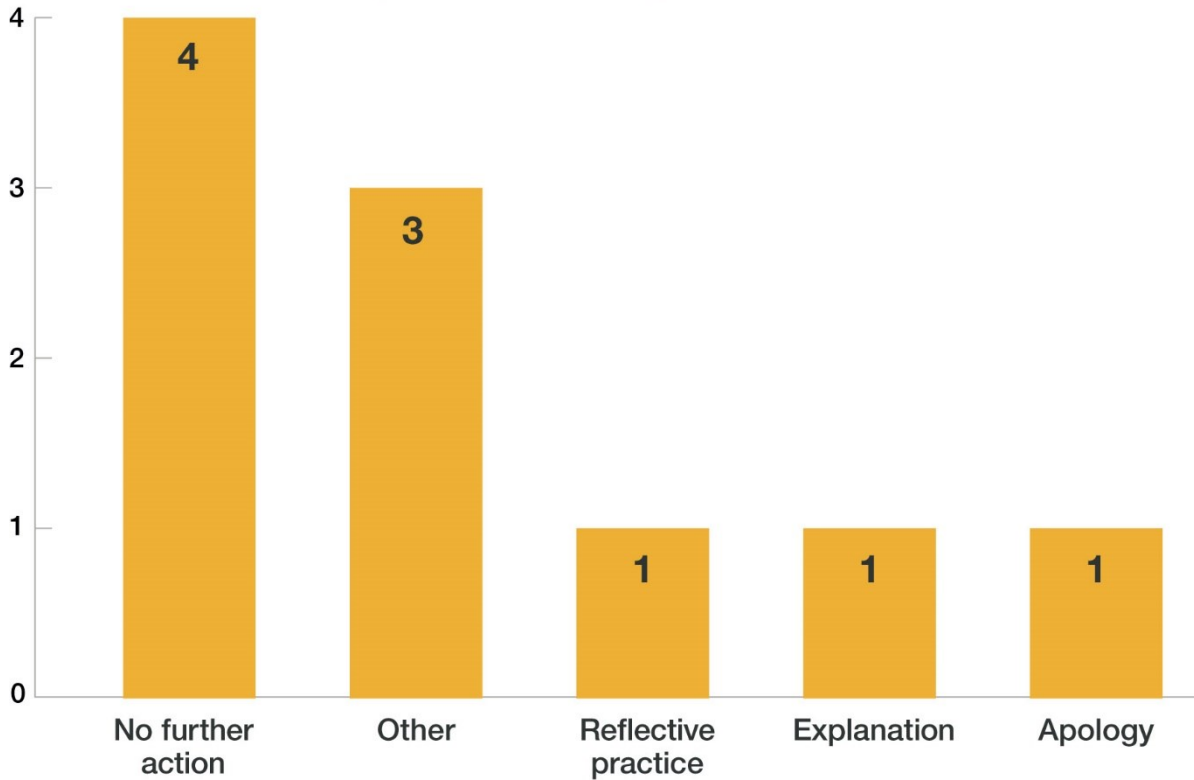
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In another similar conduct case, the appropriate authority overturned the recommendation of the investigating officer of no action for the police officer concerned and instead, sent him to the reflective practice review process (RPRP). Also, the whole department where the inappropriate behaviour took place received diversity and inclusion training to understand and focus on boundaries. This is a positive example of the appropriate authority decision making providing a level of quality assurance over the investigation and its recommendations.

The most common action taken as a result of a VAWG complaint investigation was no further action (40%). This is in line with the handling of complaint matters generally. For all complaints handled formally in 2022/23, 40% resulted in no further action being taken. Just over half of those (52%) had at least one allegation resulting in an explanation or apology.

Conduct matters do not have actions recorded in the same way that complaint cases do. For example, an explanation or apology is not applicable as there is no complainant.

### Complaint investigation outcomes



*Note: An investigation can have more than one outcome recorded.*

Of the nine complaint investigations, we agreed with the outcomes in all of those. This includes agreement with a decision to not take any action.

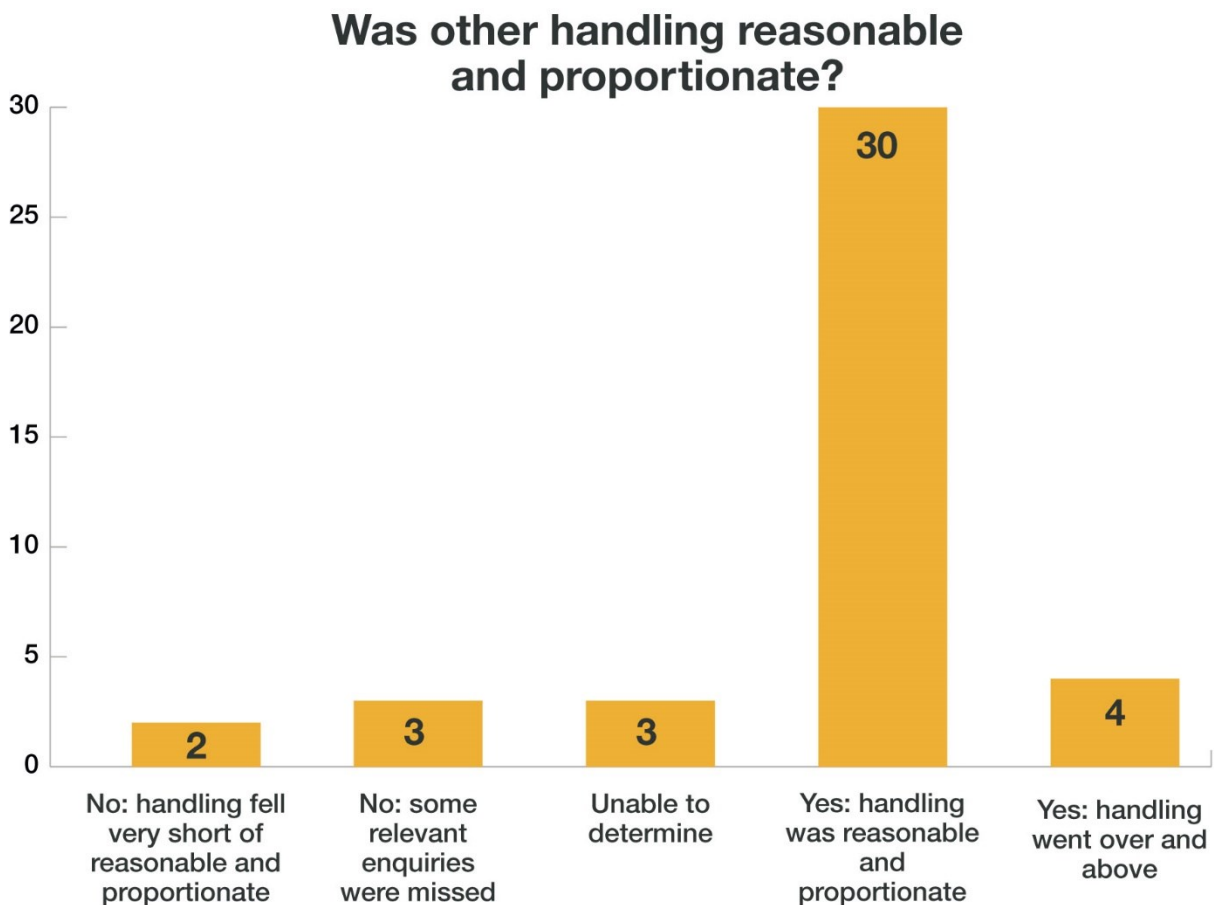
### Handling otherwise than by investigation

Of the cases handled formally, otherwise than by investigation (OTBI), the majority (39 of 42 cases) were complaints of dissatisfaction about the handling of a VAWG matter. We expect these types of cases to be handled in this way. Many were about the information a victim-survivor received, or a lack of updates during a police investigation into a VAWG matter. In the remaining three cases, the matter was about police perpetrated VAWG or police perpetrated domestic abuse.

We found that 38 of the 42 cases were suitable to be handled in this way. Of the four cases where we disagreed with the handling decision, this was based on the seriousness of the complaint and a decision that an investigation would have been more suitable to address the concerns.

Just two of the 42 cases handled OTBI were conduct matters, the rest were complaints by members of the public.

## Reasonable and proportionate



Of the 42 cases handled OTBI, we decided that 30 cases (71%) were handled reasonably and proportionately. We found four cases that went above and beyond. In two cases, we decided that the handling fell very short. In one case, the handling was rushed through to an outcome, and it was decided that the process was not correctly followed. We also considered that the response was not impartial as it appeared to defend the officer's subject of the complaint. In the other case, which was a complaint about the handling of a criminal matter, the complaint handler failed to consider any of the original crime incident and made a decision that simply endorsed the actions of the evidence review officer, without any independent assessment of the evidence.

## Timeliness

Of the cases we reviewed that were handled OTBI, we found that the majority (95%) concluded within a proportionate timescale. Almost three-quarters of the cases were in line with the national average for all complaints.

Seventy per cent of cases were resolved in 0-3 months. The national average for handling cases OTBI is 3 months or 97 days. The other 30% of cases took 3-6 months.



## Outcomes

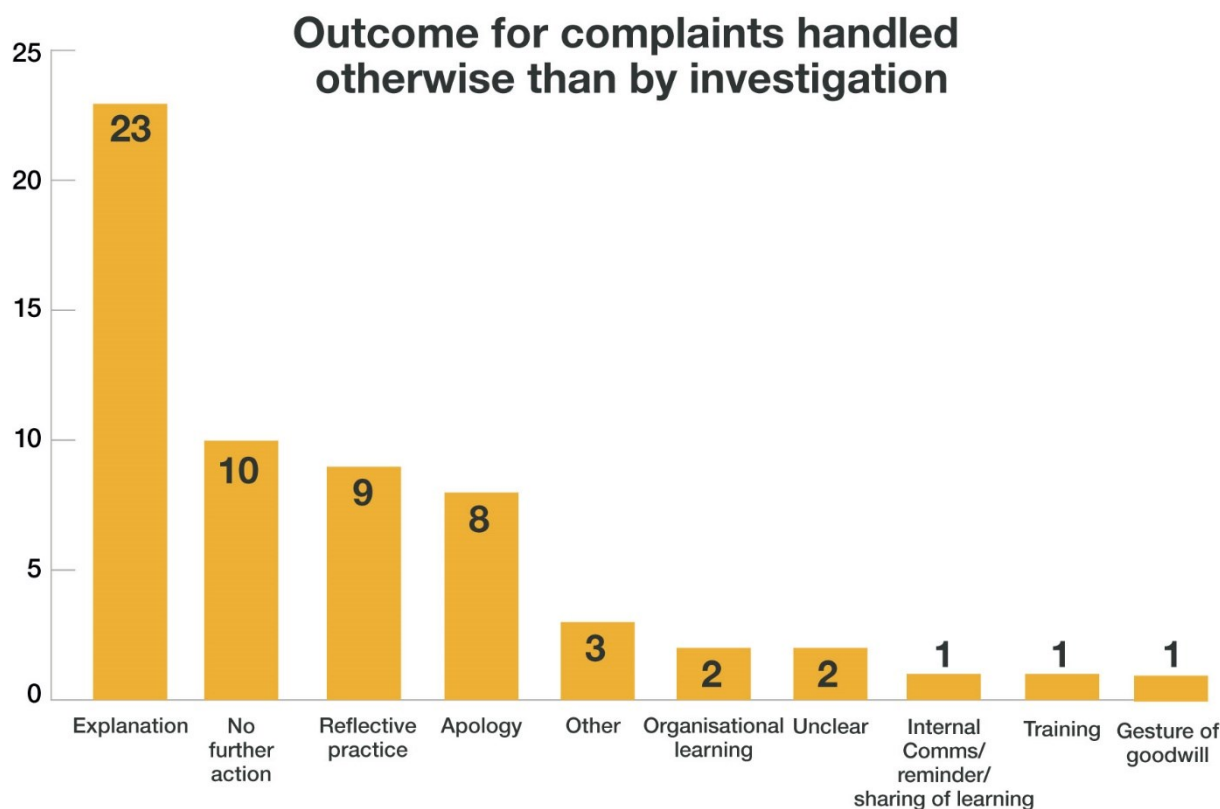
Where a complaint was handled OTBI, at the end, the complaint handler should decide whether the service provided by the police was acceptable or not acceptable.

We found that VAWG related cases are more likely to find the service provided by the police was unacceptable, than the average for all complaints. We agreed with the outcome in the majority of cases (83%).

Of 42 cases handled OTBI, the service provided was acceptable in 23 cases (55%), the national average for all complaints is 67%. The service provided was unacceptable in 11 cases (26%), the national average is 14%. In two cases the complaint handler found they were unable to decide. In some cases, the process was not correctly followed, and it wasn't clear from the final letter to the complainant if a decision had been reached.

In five of the cases, we found that the decision was not correct. In two of these cases, we assessed that the matter should have been handled via a formal investigation. In the remaining cases, we disagreed with the decision that the service provided was acceptable because some areas for improvement or learning had been identified by the complaint handler. Therefore, it would have been more appropriate to reflect those findings in the decisions made.

At the conclusion of handling otherwise than by an investigation, the appropriate authority should consider what action should be taken, if any, to remedy the dissatisfaction. For the VAWG cases we reviewed, the most likely outcome was an explanation.



*Note: A case can have more than one outcome recorded.*

Of the 59 outcomes recorded, 39% resulted in an explanation to the complainant (23), 20% had no further action taken (12), 15% resulted in reflective practice for the officer (9) and 14% of cases had an apology issued (8). This is in line with the national statistics for complaints handled formally where the most likely outcome is an explanation or apology (52% of cases) followed by taking no further action (40%). This shows that VAWG cases handled OTBI are less likely to have an outcome of no further action, in comparison to complaints generally.

Having considered all of the information available to us, we decided that the action taken was appropriate in 86% of cases. This shows that police forces are reaching appropriate conclusions, considering all of the information available, in the majority of cases reviewed. We were unable to decide in five cases due to the information that was available.

## Handling outside schedule 3

Matters handled outside of schedule 3 (i.e. informally handled) are those that complaint handlers can respond to quickly and without pursuing lengthy enquiries. For example, by providing an update on a criminal investigation.

Of the 28 cases that were handled outside of schedule 3, we found four cases (14%) where we disagreed with that method of handling and which should have been formally recorded. This was based on the type of complaint made and the response required. For example, some form of enquiry to address the dissatisfaction.

While most of the complaints were suitable to be handled in this way, we found after speaking to the forces that a small number have a process where they try to handle the majority of complaints informally in the first instance, as a matter of course. This practice is not in accordance with the legislation for handling complaints. It is not always suitable to attempt to handle all complaints informally, and a complaint should be assessed based on the seriousness of the matters raised, the most appropriate way of responding to those complaints, and the wishes of the complainant. We took steps to work with these forces individually to remind them to apply the threshold tests at the initial assessment phase and to provide guidance to improve their processes. We are satisfied that these forces now understand the requirements of the legislation and we will continue to monitor its application.

27 of the 28 cases related to complaints of dissatisfaction with the handling of a VAWG matter. Many of these were complaints around a lack of information received. We would expect these cases to be handled informally where often, an update or explanation is all that is required. The final case was classified as police perpetrated VAWG where a sex worker complained that she was spat on by a police officer and verbally abused. This was one of the cases where we decided informal handling was not appropriate.

A complainant reported her dissatisfaction with the way the police had responded to a stalking and harassment case and a lack of updates received. The complainant expressed being in fear for her safety as the perpetrator was at large. She was no longer able to reside with her children and had not received any information from the police about the perpetrator's court appearances and outcome. The complainant left the area in fear for her safety and was living in a hotel, away from her children. She was unable to obtain any information and received no response to her attempts to contact the police.

This matter was not suitable to be handled outside of schedule 3. The police force limited the scope of the complaint to the complainant simply requiring an update. We have wider concerns about how the force considered the complainant's safety and their response to her vulnerability. The handling of the complaint should have included whether the police had appropriately safeguarded the complainant and the service provided to a vulnerable victim. There was also no evidence that the police force asked the complainant how she would like the matter to be handled and if she would like the complaint to be formally recorded.

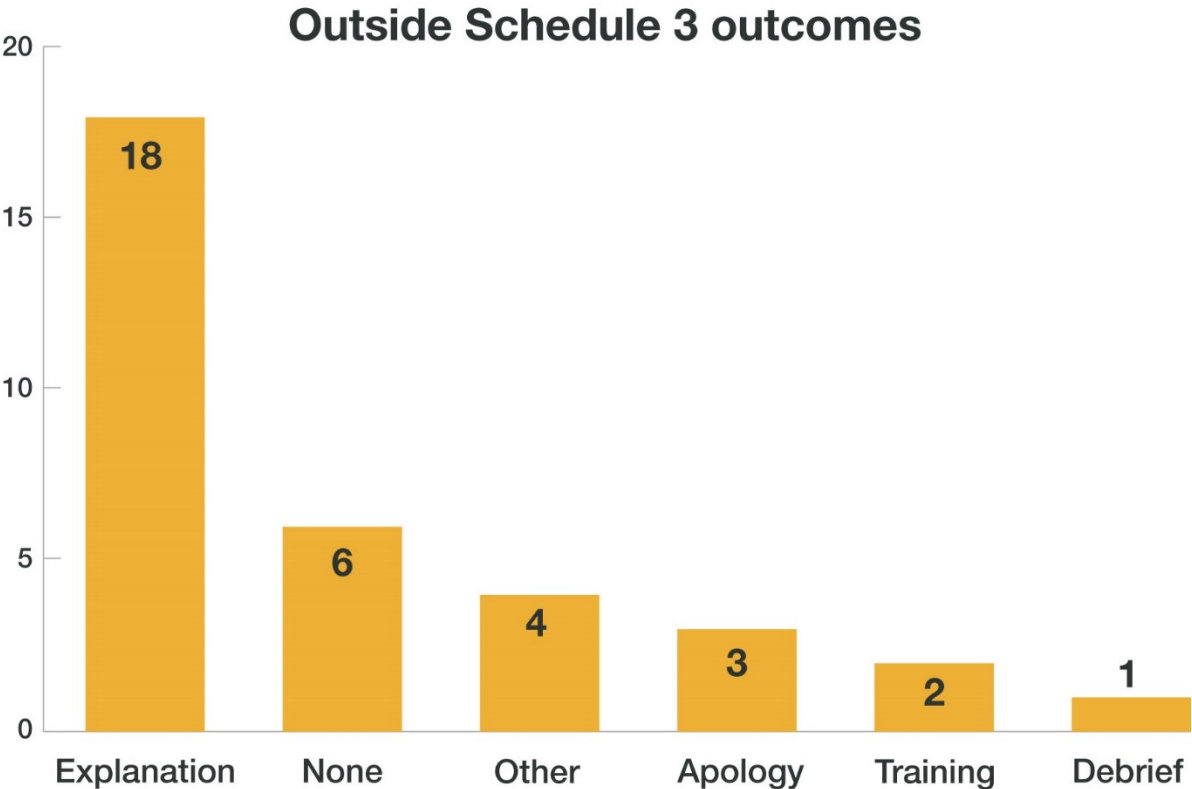
## **Timeliness**

Of the 28 cases handled informally, 19 (68%) were handled within 0-2 weeks and one case took 2-4 weeks. This is what we would expect for cases handled informally which aim to find a swift resolution without the need for protracted enquiries. This is in line with the national average for handling complaints informally which is 16 days.

There were six cases that took 1-3 months and two cases took 3-6 months. Taking a matter of months to resolve a complaint informally is longer than expected and is an indication that the matter required formal handling.

### Outcomes

The most common action resulting from complaints handled informally was an explanation being given to the complainant (53%). This is consistent with the national average of 58%. The number of VAWG complaints handled informally resulting in no action (18%) is in line with the average for all complaints handled informally (21%). Nine per cent of VAWG complaints handled informally resulted in an apology.



*Note: A case can have more than one outcome recorded.*

We agreed with the actions taken in 67% (18) of the complaints. In eight cases, we were unable to reach a decision as to whether the action taken was appropriate or not, because of a lack of information recorded. In the majority of cases, a verbal update was provided to the complainant with little, if any, written record on Centurion of the conversation. For complaints handled informally, we would expect written records to be much less than for those cases handled formally. For example, there is no requirement to produce a detailed report about the handling. However, we would expect police systems to record enough information to be able to decide what action has been taken and what information they gave to the complainant. Where a complainant was updated verbally about the informal handling, we would expect a short summary note to be added to Centurion to document that conversation. This does not need to be lengthy and bureaucratic. An example of a note could simply be:

*‘Spoke to the complainant today and provided an update on the progress of the harassment investigation. Explained that the officer in charge is going to contact her this week and apologises that they have been on leave for two weeks. I have provided an apology for the lack of updates received and the complainant was happy with the explanation provided.’*

This short summary provides sufficient detail to understand that an explanation was provided, an apology was issued and the matter was resolved to the complainant’s satisfaction. In the cases we reviewed, it was not always possible to decide what the outcome or action was.

There were two cases where we felt the handling of the complaint was not reasonable and we disagreed with the action taken. This was based on a number of factors including insensitive language, a lack of engagement with the complainant, no action being taken or it not being possible to understand what action was taken.

## **Recommendation 6**

Police forces should make improvements to record keeping for complaints handled informally and apply some basic standards. Police systems should record enough information to show what action has been taken and what information was given to the complainant. Where a complainant was updated verbally about the informal handling, a short summary note should document that conversation.

## **Communicating the outcome**

At the conclusion of complaint handling, a complainant should receive an update on the outcome of the handling. For complaints handled informally (outside of schedule 3), this is often a telephone call explaining what action was taken. A written record of the telephone conversation should be made. For complaints handled inside schedule 3, the complainant should receive the outcome in writing explaining what enquiries were conducted and the outcome of those enquiries. Depending on the complainant’s contact preferences, the outcome might also be discussed face-to-face or over the phone.

It is vital that at the end of their complaint, a complainant is clear about what has happened with their complaint, what action will be taken (if any) and if any learning was identified. Where it was considered proportionate to take no further action on a matter, the reasons for this should be clearly explained. For conduct matters involving police victims, they have a right to be treated as an interested person and updated on the outcome of the conduct matter.

For VAWG matters, it is important to consider how complainants and victim-survivors want the outcome of the handling to be communicated, what support they may need to understand the outcome of the handling and to consider their specific needs or vulnerabilities.

We reviewed the quality of the communication of the outcome to complainants / victim-survivors. We looked at whether enough information was provided to them to properly understand the handling of the matter, whether all reported matters were addressed and if a clear rationale for the findings was given. We also assessed whether the language was clear and accessible, impartial and sensitive, and acknowledged any harm caused where appropriate. We found that outcome reports for cases handled formally were accurate and addressed all matters raised in three-quarters of the cases reviewed.

Of the 28 cases handled outside schedule 3, in half the outcome was provided in writing (13) and half were updated verbally (11). We found four cases where it was not clear how the complainant was updated, due to no record on the file. We found that in 64% of cases (18), the outcome was communicated appropriately. In the remaining cases, the outcome was either not appropriately communicated or it was not possible to decide because the file did not contain information about the discussion with the complainant. In some cases, there was insufficient information provided about the process and in one case, we concluded the communication was cold and impersonal.

For complaint cases handled inside schedule 3, we found that a written report was provided to the complainant in nearly all cases (48 out of 49). The same was not true of conduct cases, where we found only five of 44 cases where a report was provided to the victim-survivor at the end. While not required in all cases, we would expect this figure to be higher. We found seven cases where a verbal update was instead provided to the victim-survivor and we decided this was appropriate due to the wishes of the victim-survivor. In some conduct cases, there isn't always an identifiable victim-survivor or interested person. In some of the cases we reviewed, a conduct matter was identified but the victim-survivor did not wish to engage in the process or pursue the matter in any way, but rightly the conduct investigation continued. We know that the CWJ super-complaint found that police victims were not treated as interested parties entitled to information about the investigation of a conduct matter. Our findings support the fact that in conduct cases, we didn't find evidence that a victim-survivor or interested person is routinely updated on the outcome of the conduct investigation. A report of the conduct investigation is written for internal purposes and to respond to the conduct matter. From our review, we didn't find evidence that victim-survivors / interested persons are either given a copy of the conduct report or updated another way about the outcome of the investigation.

## Recommendation 7

Police forces should satisfy themselves that they have processes in place to ensure that victim-survivors or interested persons in a conduct investigation are fully updated on the outcome of the conduct investigation. The outcome can be communicated by giving them a copy of the conduct investigation report, where appropriate, or by other means agreed with the victim-survivor, such as face-to-face. Where the outcome is communicated verbally, a record of the conversation should be made.

We examined whether outcome reports represented an accurate summary of the investigation or handling and whether all complaints or reports were addressed. For all cases handled formally where a report was written (91), we found three quarters (68) contained an accurate summary of the handling of the complaint or conduct matter. Similarly, we found that in 77% of cases handled formally, all complaints / reported matters were addressed. In the cases where we decided the summary of the handling was not accurate, this was because of a lack of detail about the enquiries progressed or the evidence obtained, or short summaries that did little to explain to the complainant what had happened with their complaint. In one case a very basic summary was given to the complainant but on inspection of the Centurion record, we found sufficient information to explain what enquiries had been progressed and the rationale for the outcome. This information was not provided to the complainant and would have helped them to understand the outcome of their complaint. Complaint handlers should always consider if there is a good reason to withhold information from a complainant and where there is not, the information given should be open and transparent.

We found that police forces are good at providing and explaining the right of review. A right of review was provided in 97% of complaints handled formally.

Please note, as set out in law, there is no right of review for complaints handled outside of schedule 3.

We found four investigation reports where we considered the language in the outcome report to be inappropriate. Three of these contained victim blaming language, as described in the section above. In one case of reported sexual assault, the victim was not contacted as part of the conduct investigation, instead only being considered a victim-survivor in the criminal investigation. The outcome report for the conduct matter did not include the perspective of the victim-survivor in any of the documents. Without an account from the victim-survivor, it was not possible to decide if the outcome of the conduct matter was appropriate. The language in the report was not balanced and impartial, and didn't consider the needs of the victim-survivor who should have been considered vulnerable.

A detective constable abused his position with a university student seconded to the police, by communicating with her in a sexual way, including the sending and requesting of explicit photos and flirtatious messages. Upon completion of her studies, the university student was employed by the police and reported the behaviour. The matter was treated seriously with the officer arrested and interviewed. The victim withdrew support for the investigation due to other personal issues. The investigation into the conduct matter was proportionate and the outcome report addressed all the matters reported, but the language failed to acknowledge the power imbalance between an experienced officer and a student. The report should have explored how the power imbalance affected the way the victim behaved in not rejecting the contact and the officer's mitigation that he had no reason to know the victim-survivor felt uncomfortable. The language in the report focused too heavily on the behaviour of the victim-survivor and not the officer. While there was evidence of mutual communication, the victim-survivor spoke of being concerned for her career prospects if she rejected the officer and spoke up.

We found few cases where there was evidence that the vulnerability or needs of the victim-survivor / complainant were considered when communicating the outcome of the handling. As explained above, we would expect that a high proportion of victim-survivors / complainants of a VAWG matter are vulnerable in some way, due to the nature of the behaviours being reported.

We would expect complaint handlers to consider the needs of the victim-survivor / complainant throughout the handling of a complaint or conduct matter, but particularly at the end of the handling where a victim-survivor / complainant may have expectations about the outcome or action to be taken, or even feel more isolated or vulnerable when the handling comes to an end. We found some domestic abuse cases where complainants reported feeling vulnerable or fearful for their safety within their complaint, yet signposting to support was not given either at the start of the handling or at the end, when the outcome was communicated. In these cases, we would expect the complaint handler to signpost to relevant support services such as an IDVA / ISVA or domestic abuse organisation. In some cases, we found that the complaint handler should have signposted to victim support services when communicating the outcome of the complaint.



A third party made a report of police perpetrated domestic abuse by a serving police officer towards their friend. The matter was investigated as a conduct matter. The victim-survivor did not support the investigation. At the conclusion of the investigation, the victim-survivor was contacted by police and the outcome of the investigation was explained. The complaint handler signposted the victim-survivor to a local domestic abuse project that could provide support and advice.

Victim-survivors of domestic abuse may not support criminal or conduct investigation into a partner's abuse for a variety of complex reasons. This could be feelings of shame, fear of victim-blaming, fear of repercussions, financial dependency, being isolated from a support network, fear of losing children, to name a few. It is important that complaint handlers understand these complexities. Even though the victim-survivor in this case did not want to support the investigation, the police force showed positive practice by communicating the outcome of the conduct investigation to her and signposting her to relevant support services.

### **Recommendation 8**

Complaint handlers should ensure that when communicating the outcome of a complaint or conduct matter, they consider the specific needs or vulnerabilities of the VAWG victim-survivor / complainant. They should give consideration to the way the outcome is communicated and what support is required after the handling of the VAWG matter. Complaint handlers should seek to signpost to relevant support where appropriate. This links to recommendation three where vulnerability and support should be considered throughout the handling of the VAWG matter.

## **Accessibility**

We asked the eight police forces what initiatives (if any) they have in place to raise awareness of the police complaints system to VAWG-specific groups, service-providers, complainants or victims-survivors. Of the five forces that responded, three had examples of how they have done this. Two forces reported that they don't have any specific initiatives for public complaints in this area, outside of the usual channels to raise dissatisfaction.

One force explained that it has a dedicated Prevent Officer who engages with partnership agencies to raise awareness of the complaints system. Another force said it is holding a VAWG conference for all Multi-Agency Risk Assessment Conference (MARAC) partners. It aims to educate their partners on VAWG issues and abuse of position for a sexual purpose (APSP), and to explain reporting mechanisms and the police complaints system. The final force that responded to this question explained that they had made it easier and more accessible for members of

the public to raise their dissatisfaction through the Single Online Home portal. This is a digital platform where the public can make a complaint (among other things). It acknowledged that while the portal is not specifically for VAWG groups, it has adopted this as a strategic objective within their VAWG Delivery Plan.

We also asked how forces ensure access to the police complaints system for complainants/victims that might be particularly vulnerable or have a distrust of the police due to police perpetrated VAWG. Of the five forces that responded to this question, examples provided included involving IDVAs / ISVAs, requesting anonymity at hearings and ensuring all matters of police perpetrated crime, and specifically domestic abuse, are treated as a priority to be investigated by professional standards departments. One force explained that it has a public portal called Safecall that allows members of the public to report any such abuse anonymously through an independent party.

When asked how forces ensure that a complainant / victim-survivor's journey through the complaint system is supported; recognising and responding to specific needs and vulnerabilities, they gave several examples. Two of the five forces to respond talked about how cases are allocated to experienced, specialist officers with expertise in the subject matter. One force emphasised that it discusses special measures (a range of measures which facilitates the gathering and giving of evidence by vulnerable and intimidated witnesses) at an early stage, agrees individual victim contracts on their preferred way of contact, and use of IDVA / ISVAs. One force explained that complaints handlers will respond to the needs of vulnerable complainant / victim-survivors and will refer to support services where appropriate.

We also asked forces what mechanisms they have in place for police victims to report conduct matters involving VAWG. All five forces who responded said they have a confidential reporting line. One force said it routinely shares examples with its officers and police staff of outcomes from misconduct matters, providing details of poor behaviour. The same force said it has also conducted three 'VAWG courageous conversations' events where police staff and officers are invited to discuss their experience of VAWG. In another force, domestic abuse champions are available to provide support and advice to police victims. Another force said it has adopted the initiative of 'Listening Circles', which are overseen and coordinated by the VAWG strategic lead, alongside a senior representative from the Association of Women in Policing. Any issues raised in this forum are brought to the attention of the senior leadership in PSD. These mechanisms are considered to be positive practices to allow open conversations and to raise awareness of VAWG and the unique difficulties faced by police victims in reporting behaviour.

We asked forces how they ensure that police victims of police perpetrated VAWG are properly supported to report conduct matters and through any subsequent investigation. Two of the forces that responded also talked about a welfare officer being appointed at the start of an investigation, whereas a third force mentioned a dedicated victim engagement officer acting as a single point of contact for regular and relevant updates. Other examples raised by the four forces that responded to

this question included changing the duties of alleged perpetrators and signposting to support organisations and Police Federation support. One force explained that at the start of an investigation involving a police victim, a coordination meeting may take place to ensure their wellbeing is supported through the command team, occupational health unit and line managers. Trade unions were mentioned as a source of support, alongside a victim hub providing enhanced support for victims.

Finally, when asked how forces ensure that police victims are aware of their right to report a conduct matter and be treated as an interested person under the *Police Reform Act 2002*, a number of examples were provided. Two forces said they issue a quarterly newsletter that includes information such as case studies and positive outcomes. The same forces also referred to raising awareness through inputs and attendance at wellbeing and force training events, alongside leadership training. Another force said it has a dedicated organisational learning, prevent and education team who deliver sessions to student officers, as well as newly promoted sergeants and inspectors. The sessions raise awareness of VAWG, what is considered inappropriate behaviour and how to report it. One force explained that it has created a PSD witness pledge, where PSD investigating officers consider witness welfare and those who report conduct matters receive 28 day updates. It said the pledge also provides witness support when providing evidence at meetings or hearings.

### **Recommendation 9**

All police forces should consider what initiatives and mechanisms they have in place to promote access to the police complaints system for VAWG specific groups. Forces should consider what local partnerships their police force could benefit from. They should also look at the specific needs of police victims to access the system and what provisions are in place internally to support them. Consideration should be given to how these initiatives and mechanisms to report VAWG are promoted.

# Recommendations

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|          |   |
|----------|---|
| <b>1</b> | The National Police Chief's Council (NPCC) provides guidance to all police forces in England and Wales on the definition and correct application of the VAWG Centurion national factors.  |
| <b>2</b> | The IOPC will begin a separate project focusing on how police forces respond to PPDA reports. This will include how reports of PPDA are identified and recorded, through to how complaint and conduct matters are handled. The work will build on what we know from the CWJ super-complaint report and will focus on identifying solutions to improve the policing response to PPDA.  |
| <b>3</b> | Police forces should work with local support groups, charities and organisations to form partnerships to provide appropriate support. Complaint handlers should have information and resources available to them so they know what those local partnerships are.  |
| <b>4</b> | Where a VAWG complaint or conduct matter is raised, complaint handlers should consider the possible vulnerabilities associated with being a victim-survivor or complainant of a VAWG matter. Complaint handlers should consider what support might be required and discuss the options with the complainant / victim-survivor. Responsibility for victim-survivor care should be documented on the file.                    |
| <b>5</b> | Police forces should include conflict of interest declaration records as standard on all VAWG cases to show that they have considered any possible conflicts and to reassure complainants / victim-survivors of the suitability of the appointed complaint handler.   |
| <b>6</b> | Police forces should make improvements to record keeping for complaints handled informally and apply some basic standards. Police systems should record enough information to be able to show what action has been taken and what information was given to the complainant / victim survivor. Where a complainant was updated verbally about the informal handling, a short summary note should document that conversation. |

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| 7 | Police forces should satisfy themselves that they have processes in place to ensure that complainants, victim-survivors or interested persons in a conduct investigation are fully updated on the outcome of the conduct investigation. The outcome can be communicated by giving them a copy of the conduct investigation report, where appropriate, or by other means agreed with the complaint / victim-survivor such as face-to-face. Where the outcome is communicated verbally, a record of the conversation should be made.                                    |
| 8 | Complaint handlers should ensure that when communicating the outcome of a complaint or conduct matter, they consider the specific needs or vulnerabilities of the VAWG victim-survivor / complainant. They should give consideration to the way the outcome is communicated and what support is required after the handling of the VAWG matter. Complaint handlers should seek to signpost to relevant support where appropriate. This links to recommendation three where vulnerability and support should be considered throughout the handling of the VAWG matter. |
| 9 | All police forces should consider what initiatives and mechanisms they have in place to promote access to the police complaints system for VAWG specific groups. Forces should consider what local partnerships their police force could benefit from. They should look at the specific needs of police victims to access the system and what provisions are in place internally to support them. Consideration should be given to how these initiatives and mechanisms to report VAWG is promoted.   |

## Next steps

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The recommendations made in this report are aimed at improving the handling of complaints involving VAWG, and complaints handling in general. We aim to build trust and confidence to report complaints and conduct matters involving VAWG and support the police response to those matters in a way that is robust and victim focused. We found some positive examples of good handling of VAWG complaint and conduct matters, but we acknowledge there is still room for improvement, particularly around understanding the vulnerabilities of VAWG complainants and victim-survivors. We want to help police forces to better respond to those needs, and to share positive practice when we find it.

## Recommendation 1

The IOPC will work with the NPCC to improve the guidance around the application of Centurion national factors on VAWG. This will improve the quality of data collection. Having more accurate data will allow police forces and other oversight bodies to understand the picture in policing as it relates to VAWG and in turn, to monitor and track improvements or areas of concern. We have already started conversations on this recommendation.

We will publish updates about this recommendation in our Oversight monthly newsletter, which is aimed at complaint handlers and is published on our [website](#).

## Recommendations 2 – 8

The IOPC Oversight team, as part of our regular engagement programme with police forces, will hold structured discussions on these recommendations. These conversations will monitor implementation of the recommendations and support forces to put in place initiatives that work to improve complaints handling.

We will publish any shareable practice in our Oversight monthly newsletter to help police forces improve their processes and to support positive practice.

## Wider VAWG thematic work

### **Focus issue 12: Data capture guidance**

The IOPC has updated its [Focus guidance](#) on data capture to include VAWG case studies and examples to support the application of VAWG Centurion national factors. Alongside the NPCC guidance, this will improve data collection and intelligence about VAWG complaint handling.

### **Focused PPDA project**

As explained above, this dip sample did not identify a sufficient number of PPDA cases to satisfy the actions arising from the CWJ super-complaint. The IOPC will conduct further work into the handling of PPDA cases in police forces. This further work will form part of a separate sub-project and we will create a separate report on it.

We will communicate with policing stakeholders about this project, once the proposal and methodology has been agreed. We will also share details about this work with the non-policing stakeholders we have been working with, in particular the Centre for Women's Justice.

## **Avoiding victim blaming language guidance**

Our work to improve the police response to violence against women and girls is a vital component in our aim to improve public confidence in policing - and the complaints system. With this in mind, a guidance document called **Ending victim blaming: violence against women and girls: Why language, attitudes, and behaviours matter** has been produced. It will be made available for IOPC staff and all police forces to use. We aim to publish the guidance externally in March 2024.

## **Know your rights campaign**

We are developing a targeted campaign to raise awareness of the police complaints system and the rights of victims when making a complaint against the police. The campaign will be targeted at victim-survivors of violence against women and girls and the organisations supporting them. The campaign will launch in the Spring 2024.

## **IOPC internal review of VAWG case handling**

To complement this dip sampling in police forces, the IOPC conducted an internal review of its handling of VAWG cases in independent investigations and reviews. The IOPC quality and service improvement team has reviewed 60 independent investigations, 55 reviews as well as a separate review to consider victim blaming language. These reviews aimed to give an end-to-end overview of recent IOPC practice in cases featuring VAWG. We are considering the findings of these dip samples which will feed into internal improvement work.

## **Statistical review of referrals**

In May 2023, we published a [statistical review](#) of VAWG referrals received by the IOPC. The review assessed compliance with the mandatory referral criteria and provided a baseline to measure referrals against in future. It included a reminder on legislation and guidance about off duty conduct. We plan to repeat the review and monitor referrals numbers in 2024.

## **Annex A**

### **VAWG Centurion National factors:**

#### **VAWG – Police perpetrated**

This concerns any complaint matter arising from or relating to a VAWG incident where the alleged perpetrator (of any gender) is a police employee. If a police employee is also the victim, the 'VAWG – police victim' factor should also be selected. The complainant does not have to be the victim of the VAWG incident.

#### **VAWG – Police victim**

This concerns any complaint arising from or relating to a VAWG incident where the victim is a police employee. If a police employee is also the perpetrator, the 'VAWG – police perpetrated' factor should also be selected. The complainant does not have to be the victim of the VAWG incident, and the perpetrator can be of any gender.

#### **VAWG – Dissatisfaction handling**

An expression of dissatisfaction as to the handling of a VAWG case that is expressed by or on behalf of an individual eligible to make a complaint under schedule 3 of the *Police Reform Act 2002*. The complainant does not have to be the victim of the VAWG incident, and the perpetrator can be of any gender.



## Annex B

### Accessibility survey

**Q1. What initiatives (if any) do you have in place to raise awareness of the police complaints system to VAWG-specific groups, service-providers, complainants or victim-survivors?**

*For example: collaborating with local community groups or VAWG charities/organisations to share information on the police complaint system and complainants' rights? This may also include work by your local policing body.*

**Q2: We know that victims may find it especially difficult to report VAWG related offences, with specific concerns they will not be believed, will not receive an impartial police response or fear of repercussions. How do you ensure access to the police complaints system for complainants / victim-survivors that might be particularly vulnerable or have a distrust of the police due to police perpetrated VAWG?**

**Q3: As well as ensuring good access to the complaint system, how do you ensure that a complainant / victim-survivor's journey through the complaint system is supported, recognising and responding to specific needs and vulnerabilities?**

**Q4a: What mechanisms do you have in place for police victims to report conduct matters that are VAWG related?**

*For example: confidential reporting line, via line managers, reporting area on force intranet page.*

**Q4b: How do you raise awareness of the mechanisms available for police victims?**

*For example: News articles, new recruit training sessions, professional standards department inputs, line manager training.*

**Q5: How do you ensure that police victims are aware of their right to report a conduct matter and be treated as an interested person under the *Police Reform Act 2022*?**

*For example: News articles, professional standards department inputs, sharing case studies, leaflets and materials in police buildings.*

**Q6: We know that for police victims, there can be additional concerns about the impact on their working life. How do you ensure that police victims of police perpetrated VAWG are properly supported to report conduct matters and throughout any subsequent investigation?**

*For example: welfare officers, signposting to support agencies, relocating either the victim or perpetrator, consideration of shift patterns, line manager awareness and training.*

## Annex C

### Handling outside of schedule 3

Where suitable, some complaints can be dealt with outside of the requirements of Schedule 3 of the *Police Reform Act 2002*. Some complaints might simply require an explanation, an update or for information to be shared. These are actions that can be taken quickly without detailed enquiries taking place. Handling a complaint outside the requirements of Schedule 3 provides an opportunity to promptly address the concerns a complainant has raised and aims to resolve the matter to the complainant's satisfaction. Handling complaints outside of Schedule 3, promptly, may be the most efficient, effective, and beneficial way to resolve the complaint.

Some complaints are not suitable to be handled outside of Schedule 3. If the complaint handler cannot resolve the complaint to the complainant's satisfaction, or it becomes apparent that further enquiries are needed, this indicates that the matter should be recorded. A complaint will not be suitable for handling outside of Schedule 3 where accounts need to be taken from officers, or other investigative steps are required. If a complainant is dissatisfied with the way their complaint has been handled, they can ask for it to be recorded.

A complaint must be recorded and handled under Schedule 3 if the appropriate authority decides that it is appropriate, if the complainant requests for it to be recorded or if the complaint:

- is an allegation that the conduct or other matter complained of resulted in death or serious injury
- is an allegation that, if proved, might constitute a criminal offence by a person serving with the police or justify the bringing of disciplinary proceedings
- is about conduct or any other matter which, if proved, might have involved the infringement of a person's rights under Articles 2 or 3 of the European Convention on Human Rights or
- meets any of the mandatory referral criteria

### Handling otherwise than by investigation

Where a matter has been recorded and there is no requirement to investigate, and the appropriate authority decides that it is not reasonable and proportionate to investigate a recorded complaint, the complaint can be handled under Schedule 3 otherwise than by investigation (OTBI). Complaint handlers can think creatively about what action will be most useful to provide meaningful answers and to remedy the dissatisfaction of the complainant.

Where the complaint includes concerns about the actions of a person serving with the police, that person should be actively encouraged to participate in the handling of

the complaint. It is generally expected that they will, at a minimum, comment on the complaint.

## Investigation

A complaint must be investigated where the appropriate authority decides that is the reasonable and proportionate way to handle it. In addition, the following must be investigated:

- any complaint where there is an indication, either from the complaint itself or from handling to date, that:
  - a person serving with the police may have committed a criminal offence or behaved in a manner that would justify the bringing of disciplinary proceedings, or
  - there may have been the infringement of a person's rights under Articles 2 or 3 of the European Convention on Human Rights
- any complaint, death or serious injury matter or recordable conduct matter that the IOPC has decided must be investigated, following the referral of the matter to the IOPC or the IOPC treating the matter as having been referred
- any complaint that the IOPC has decided must be investigated or re-investigated following its decision in respect of a review.

## Annex D

# VAWG factors applied by the IOPC

## 1a. Violence against women and girls (VAWG)

Any cases concerning a matter arising from or relating to a violence against women and girls incident and where at least one victim is a woman or girl, including transgender women and girls, or perceived as such. Cases involving an abuse of position for sexual purpose (APSP) also fall within the violence against women and girls category.

## 1b. VAWG: Perpetrator is a police employee

This concerns any matter arising from or relating to a violence against women and girls incident where the alleged perpetrator (of any gender) is a police employee. If a police employee is also the victim, the 'Perpetrator and victim are police employees' sub-factor would be selected instead.

## 1c. VAWG: Perpetrator and victim are police employees

This concerns any matter arising from or relating to a violence against women and girls incident where both the perpetrator and the victim are a police employee. The alleged perpetrator can be of any gender.

## 1d. VAWG: Dissatisfied with the handling of a violence against women and girls related matter

An expression of dissatisfaction as to the handling of a violence against women and girls case. The complainant does not have to be the victim of the violence against women and girls incident, and the perpetrator can be of any gender.

## 2. Police perpetrated domestic abuse (PPDA)

This concerns any domestic abuse complaint or conduct matter where the alleged perpetrator (of any gender) is a police employee. Our guidance states that:

"A police perpetrator is a police officer (of any rank), special constable, police community support officer, police staff or person contracted to work for the police.

Domestic Abuse:

Behaviour of a person ("A") towards another person ("B") is "domestic abuse" if -

- A and B are each aged 16 or over and are personally connected to each other, and
- the behaviour is abusive

Behaviour is “abusive” if it consists of any of the following—

- physical or sexual abuse
- violent or threatening behaviour
- controlling or coercive behaviour
- economic abuse
- psychological, emotional, or other abuse
- and it does not matter whether the behaviour consists of a single incident or a course of conduct

Two people are “personally connected” to each other if any of the following applies—

- they are, or have been, married to each other
- they are, or have been, civil partners of each other
- they have agreed to marry one another (whether or not the agreement has been terminated)
- they have entered into a civil partnership agreement (whether or not the agreement has been terminated)
- they are, or have been, in an intimate personal relationship with each other
- they are relatives
- they each have, or there has been a time when they each have had, a parental relationship in relation to the same child. Please note, a person has a parental relationship in relation to a child if—
  - the person is a parent of the child, or
  - the person has parental responsibility for the child
  - “child” means a person under the age of 18 years
  - “civil partnership agreement” has the meaning given by section 73 of the Civil Partnership Act 2004
  - “parental responsibility” has the same meaning as in the Children Act 1989 (see section 3 of that Act)
  - “relative” has the meaning given by section 63(1) of the Family Law Act 1996.”

## **2a. Victim is a police employee**

This concerns any incident arising from or relating to a police perpetrated domestic abuse incident where the victim is a police employee.

# Glossary

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## Appropriate authority

The appropriate authority is the chief officer with direction and control over the police employee. For most forces, this is the chief constable. Where the chief officer is subject of a complaint or conduct matter, the appropriate authority is the local policing body (the police and crime commissioner or equivalent).

## Centurion national factor

A 'tag' applied to complaint and conduct matters onto the police case management system to provide situational context to the complaint or conduct matter.

## Conduct matter

Any matter which is not subject of a complaint, where there is an indication (whether from the circumstances or otherwise), that a person serving with the police may have committed a criminal offence or behaved in a manner which would justify disciplinary proceedings.

## Mandatory referral criteria

Complaints and recordable conduct matters that must be referred to the IOPC. See IOPC [statutory guidance](#) for more information.

## Misconduct and gross misconduct

Misconduct is a breach of the policing [Standards of Professional Behaviour](#) that is serious enough to justify disciplinary action.

Gross misconduct is misconduct so serious it warrants an officer's dismissal from the police.

## Non-police victims

Victim-survivors who are not police employees.

## Police complaint

Any expression of dissatisfaction with a police force that is expressed by or on behalf of a member of the public.

## Police employees

Police officer (of any rank), special constable (volunteer police officers), police community support officers (PCSOs), police staff, and people contracted to work for the police.

## **Police victim**

Victim-survivors who are also police employees.

## **Reflective practice review process (RPRP) / reflective practice**

The reflective practice framework is designed to give officers and staff an opportunity to discuss where things could have gone better and look for ways of addressing those issues together with their line manager. It does not lead to a disciplinary outcome. A reflective discussion between the officer and their line manager takes place, where the emphasis is on learning from mistakes and preventing a recurrence of the matter. Actions might be agreed to help officers and police staff develop and improve their performance. Reflective practice can be used as a method of handling a complaint otherwise than by investigation. A referral to RPRP can be made as part of an outcome following a complaint or recordable conduct matter.

## **Standards of professional behaviour**

A statement of the expectations that the police and the public have of how police officers should behave.

## **Victim-blaming**

The transference of blame from the perpetrator to the victim-survivor who is held entirely or partially to blame for the harm they suffered.

## **Victim-survivor**

Although 'victim' is a legal definition within the criminal justice system, 'survivor' can be used as a term of empowerment to convey that a person has started the healing process and may have gained a sense of peace in their life. Some people identify as a victim, while others prefer the term survivor. Throughout this guidance, we use the term 'victim-survivor'.



Published February 2024

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