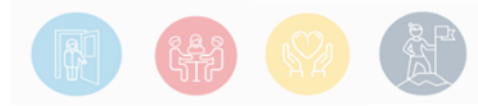


# **Independent Scrutiny of Police Complaints Panel**

September 2025



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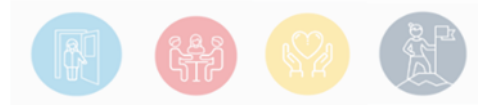
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# Purpose of the Independent Scrutiny of Police Complaints Panel

The Independent Scrutiny of Police Complaints Panel (ISPCP) consists of 10 independent panel members, as pictured below, who are all volunteers representing the communities of Avon and Somerset. Their aim is:

***'To act as a 'critical friend' to the Police and Crime Commissioner (PCC) and to Avon and Somerset Constabulary by providing feedback on completed complaint files to the office of the PCC and to the Constabulary's Professional Standards Department (PSD). The Independent Scrutiny of Police Complaints Panel (ISPCP) will review complaints against the police from a local citizen's viewpoint.'***

Further information can be found [on our website](#).



## STRUCTURE OF THE SESSION

A total of **28 completed complaint files** were reviewed in detail by the Panel ahead of the meeting. During the session, the Panel chose to focus specifically on discrimination-related complaints. Additionally, three Stop & Search complaints from Quarter 1 were reviewed, in line with the Panel's commitment to implementing a key recommendation from Desmond Brown's report: *Identifying Disproportionality in the Criminal Justice System*.

The cases scrutinised were discussed in depth with Inspector Louise Pressly from Avon and Somerset Constabulary's Professional Standards Department, who attended the meeting to provide verbal insights.



Sadly, the Panel recently bid farewell to one of its longest-serving members, who passed away following a period of ill health. As someone who had been part of the ISPCP since its inception, their thoughtful contributions and valuable insights will be deeply missed.

**Panel Attendees** – KS, BK, JB, PR, AD, LC,

Apologies – JSG, SB, EK, JFT

## Input from Avon and Somerset Constabulary's Professional Standards Department (PSD)



Owain Taylor, Administration Manager from Avon and Somerset Constabulary's Professional Standards Department (PSD) was joined by a colleague to provide an overview to the Panel regarding the police complaint handling processes.

### Avon & Somerset PSD Complaint Handling Timescales:

- **Non-Schedule 3:** Aim to resolve within **10 working days**.
- **Schedule 3:** Average resolution time is **139 working days**.

Assessors within PSD are responsible for a wide range of matters beyond public complaints, including business interests and potential conflicts of interest and ensuring that all cases are accurately recorded and assessed in line with statutory requirements.

Complaints are categorised using nationally defined Independent Office for Police Conduct (IOPC) categories, which have remained unchanged since 2020, with informal resolution preferred where appropriate. Approximately 3,000 complaints are received annually by Avon and Somerset Constabulary's PSD, with approximately 200 cases dip-sampled for quality assurance. This work is supported by the reviews conducted on a quarterly basis by the Panel.

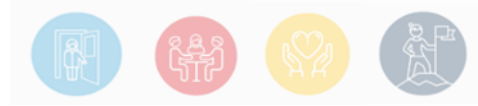
The case management system used to record police complaints is called Centurion and this has recently been upgraded, with further automation expected in early 2026. The team is also trialling the use of Co-pilot for proofreading and quality checks. Challenges remain around consistency in service levels between reporting routes (e.g. 101 vs online), managing repetitive complaints, and ensuring appropriate categorisation. However, PSD continues to refine its processes and values constructive feedback from the panel, which is used to inform ongoing improvements.



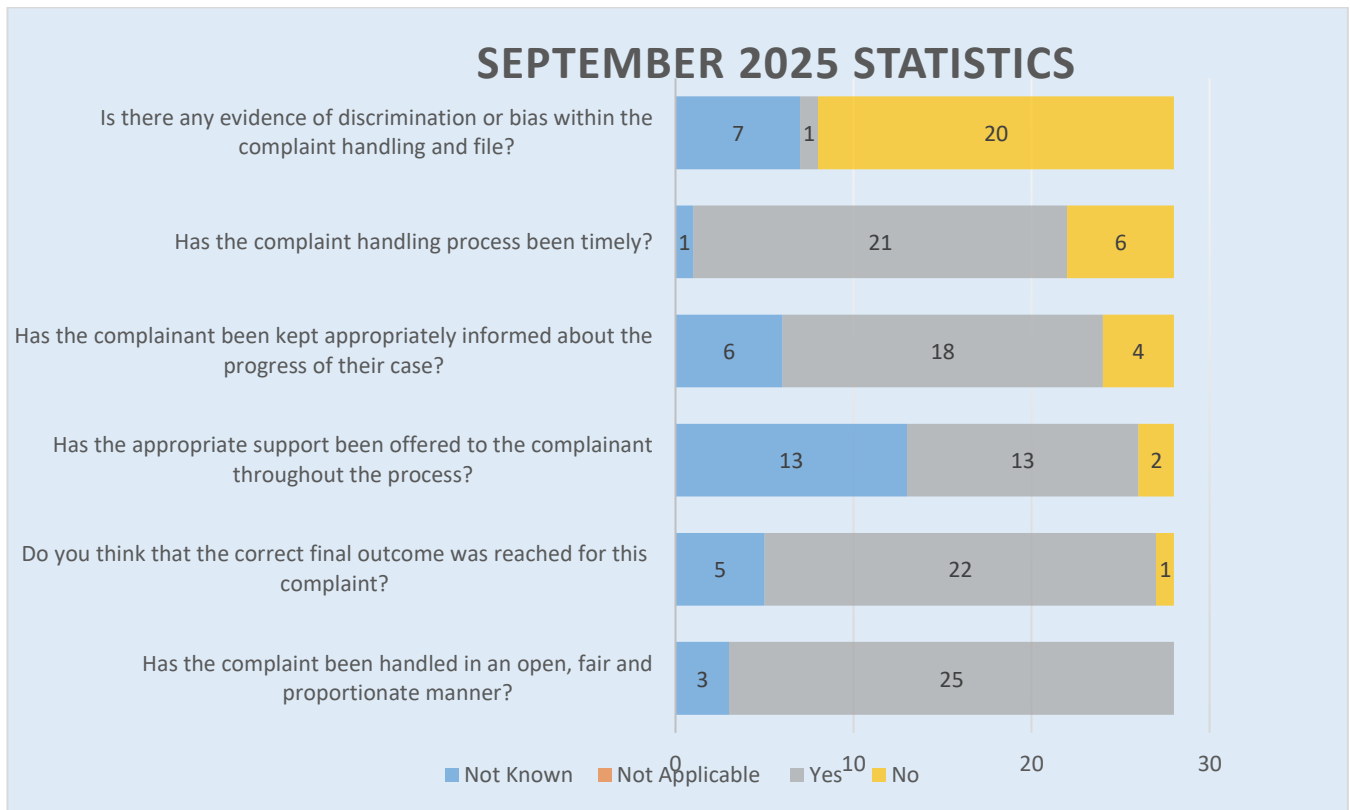
## MONITORING AND OVERSIGHT LOG

This section records ongoing actions requested by the Panel and supports continued scrutiny of police complaint handling.

No	Date	Action (OPCC, ASC, Panel)	Progress update	Completed/ Ongoing/ Keep In View
1	2022-09	PSD to update the panel following Learning Meetings & provide a briefing on any recent complaint statistics of interest including the IOPC quarterly bulletins and annual complaints report. (ASC)	Dec 24 – C/I Baker shared Quarter 2 learning captured.  Update sought for Sept 25 meeting.  Rolled over until Dec 25 meeting when HOC will be in attendance.	KIV
2	2024-06	An Individual Learning Tracker has been created, and a new feedback system introduced to ensure that issues with grammar, spelling, and tone in PSD correspondence to complainants are addressed directly with individuals, including the sharing of positive feedback.	Dec 24 – system continues to work well with feedback being fed back directly to named individuals, including areas for improvement and work that can be positively praised.  Update Sept 25 – Owain Taylor attended, confirmed individual feedback is provided & discussed as a team.	Ongoing
3	2024-09	IOPC <a href="#">Youth Panel National Survey 2024 Report</a> . ISPCP Chair requests an update from PSD in response to report's key recommendations.	Due to recent staff changes from C/I Barlow, this action remains outstanding. BM to forward report to LH.	KIV
4	2024-09	Otherwise Than By Investigation Workshops	PSD – workshops rolled out over the autumn 2024 & to continue in 25. Dec – update sought	KIV
5	2025-03	Police Integrity Inspection Feb 2025	Supt Hunt to provide a full debrief at the next meeting in June. Supt Hunt aims to present relevant performance data at the next panel meeting in Sept	Update provided in June meeting.  Ongoing to Dec meeting
6	2025-09	All Stop & Search Complaint cases to be examined as per <a href="#">Identifying-Disproportionality-Report.pdf</a>	KS/1 Stop & Search complaint case referred to ISOPPP (Q3)	Ongoing to link in with ISOPPP



## STATISTICAL ANALYSIS



*This chart related to the six questions in the feedback form, 24 cases were sampled. Panel members record 'not known' when the case file does not give sufficient detail to allow a categorical yes or no answer*

## USEFUL READING

- For a reminder on complaint categories see Appendix A (page 28) onwards - [Guidance-on-capturing-data-police-complaints-Feb-2024 \(1\).pdf](#)
- The IOPC produce a monthly Oversight Newsletter for complaints handlers in forces and OPCCs – you can read the October edition [here](#)

In this newsletter you will find information on:

- new Focus issue - suspending investigations or other handling
- indecent images of children and the mandatory referral criteria
- telephone referrals to the IOPC
- spotlight on violence against women and girls: Positive practice
- a question and answer about complainant status



## HIGHLIGHTS OF CONCERNS, QUESTIONS OR ISSUES RAISED BY THE PANEL – THEMATIC - DISCRIMINATION

Panel Member Feedback	PSD Response
<b><u>JB/2 - Complaint Summary (Discrimination)</u></b>	
The complainant alleged that the police are not investigating the theft of bike properly, and that their case has been prejudiced due to his nationality.	
<b><u>Panel Member Feedback</u></b>	
<i><b>Positive comments</b> - The handling officer showed the appropriate level of empathy within the final letter regarding the loss of the complainant's bike</i>	
<i><b>Question for PSD</b> - The initial complaint was not formally recorded?</i>	<i>Initial complaint was suitable for handling outside of schedule 3 and did not require formal recording, once it was clear it was not resolved it went to next stage being formally recorded and dealt with as an OTBI.</i>
<i>Why aren't call logs included within the evidence?</i>	<i>Not an evidence bundle as such as this was an OTBI. The Storm log may or may not be included in the proportionate enquiries and referred to accordingly in the Final letter. It can be viewed at any time on Storm. Copying and printing storm logs is avoided for protection of data and duplicating data on our systems.</i>
<b><u>JB/3- Complaint Summary (Discrimination)</u></b>	
Complainant alleges that; the police are slow when carrying out their investigation into an alleged assault, the police send incorrect information to a hospital - only rectified by the complainant's actions, the police failed to send all of the evidence to the CPS, the police discriminated against the complainant due to their race, and that the police officer in charge of the case failed to regularly update the complainant.	



Panel Member Feedback	PSD Response
<p><b><u>Panel Member Feedback:</u></b>  <b><i>Negative comments - Potential data breach when the wrong email was supplied to the RUH. This was an oversight, therefore the police should follow-up to see whether the medical record was actually sent to this email address and what the recipient did with it. There was not a clear expectation set for how frequent the officer will contact the complainant.</i></b></p> <p><b><i>Question for PSD - Why was there omission from the file of evidence information about the requests/correspondence with the CPS?</i></b></p>	<p><i>I've checked to see if this is a data breach needing action. There is a full entry on the niche record. It was the complainant's medical consent form, which was emailed, not his medical records. It is a template form agreeing for his information to be released to the police. It did not contain any medical information; however, it did have his name and date of birth on it. The form was emailed to RUH medical records but their old email address rather than their current one, so it was undeliverable.</i></p> <p><i>This is all recorded in Niche. As an OTBI we wouldn't necessarily expect to see it in our case docs unless it was particularly relevant and necessary to the case. It would avoid duplicating sensitive docs into other systems.</i></p>
<p><b><u>LC/2- Complaint Summary (Discrimination)</u></b></p> <p>Complaint that officers removed an 11-week-old baby from the arms of her father, and allowed the baby to be taken to a northern county with her mother who was deemed to have mental health issues. Discrimination on gender as the mother (female) took priority over the needs of the father (male). Decision was supported by professional health care advice and was based on the immediate needs of the baby.</p> <p>Q10 - no evidence of support/signposting offered to complainant, but not sure what would be available. I can imagine he would be very distressed over losing close contact with his baby being taken so far away and would benefit from signposting to teams who could assist with him securing on-going contact.</p> <p>No evidence of the complainant being kept informed of progress with his case (Q11), and he emailed to request an update after approx 2 months. Case handling was not timely (Q12), but it was explained in the first contact that there was likely to be a delay.</p>	





Panel Member Feedback	PSD Response
<p><b><u>Panel Member Feedback:</u></b>  <b><i>Positive feedback - very thorough explanation of the decision-making process by the officer.</i></b></p> <p><b><i>Negative feedback - no updates on progress, and (as expected and acknowledged in an early comms to the complainant) not timely handling of case from submission to final letter.</i></b></p>	<p><i>There were delays, received and assessed in PSD 30/09/24, required indication test from a PSD Inspector, which created delay. Sent out to district to deal 11/10/24. So, complaint handler didn't receive until mid-October. Final letter sent out 06/12/24. 2 months for district to deal is not unreasonable when weighed against their competing demands.</i></p>
<p><b><u>LC/3 - Complaint Summary (Discrimination)</u></b>            5x allegations against 2x officers, 3x of the allegations deemed 'learning to be issued to officers', and 1x 'department learning'</p> <p>91 very long, repetitious documents to read through - many about incidents and complaints which have already been resolved many years ago. Very difficult to follow due to how they are written. I consider this was timely handling due to the volume of emails the handlers were up against.</p> <p><b><u>Panel Member Feedback:</u></b>  <b><i>Positive comments - A very challenging set of documents to read through and comprehend. I felt the right outcome was reached to the complaint, and good to see confirmation that RP had taken place with the officers.</i></b></p> <p><b><i>Questions for PSD - For the department learning identified against the 5th allegation, is that tracked against all complaints and not just relating to this complainant?</i></b></p>	<p><i>I think this refers to reasonable adjustments and the comments on the Final Letter:</i></p> <p><i>'However, the Investigating Officer will request the Administration Team now only respond to the email that is provided by Mr XXX and that this outcome is printed and provided as a hard copy. The Investigating Officer will request that</i></p>

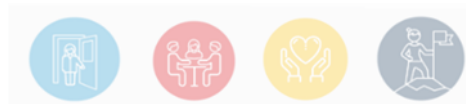


Panel Member Feedback	PSD Response
	<p><i>the reasonable adjustments are noted against the file for Mr XXX on the PSD computer system.'</i></p> <p><i>I put your query to Owain Taylor:</i></p> <p><i>'The short answer is yes; the assessors will look out for reasonable adjustments. For example, we recently had a case whereby a complainant mentioned they were dyslexic and didn't like using written communication, a note was put on the complainant record for future complaints, so they didn't need to have the same conversation again. Left is another example which was added to a staff record in October 2024 - the Note reads "Mr X has ADHA, Autism, and Dyslexia so finds communicating in writing extremely challenging and will always prefer a phone call".</i></p>
<p><b><u>JSG/2 – Complaint Summary (Discrimination)</u></b></p> <p><i>Complainant alleges being run over by a known person who has allegedly also been racially abusing the complainant for a number of years. The complainant alleges that the perpetrator has lied to Police, and made numerous complaints over the course of months in respect to the handling of the incident but these had been deemed not eligible complaints as they related to the validity of statements, and not the actions of Officers. The complainant was unhappy with the handling of their complaints and requested a complaint was recorded and responded to. The complaint states that they feel discriminated against due to their race, and that the matter would have been handled differently if they were white.</i></p> <p><b><u>Panel Member Feedback:</u></b></p> <p><b>Negative feedback:</b></p> <p><b>-A - Review &amp; Response Required - 08.11.24.msg: This message starts with "Sorry to bring this matter to your attention again." This infers both a level of bias and frustration against the complainant and should not have been included in a professional communication.</b></p>	<p><i>Internal communication, which may be acknowledging demand on people's time/attention.</i></p>





Panel Member Feedback	PSD Response
<p><i>potentially have reduced capacity e.g. cognitive health needs etc?</i></p>	<p><i>we need to ensure we don't assume they would benefit from a reasonable adjustment.</i></p> <p><i>It would be interesting to know what the panel would suggest as a reasonable adjustment for the above example, maybe it is something we haven't thought about.'</i></p> <p><b><u>Response from Panel Member post meeting:</u></b></p> <p><i>One suggestion regarding reasonable adjustments is whether verbal communication could be considered more (if capacity allows) for complainants with additional health or learning needs.</i></p> <p><i>I imagine there are more ways to make things accessible. Perhaps it might be worth PSD consulting with the inclusion, equalities and disability lead within A&amp;S in relation to any further potential reasonable adjustments to the system for complainants who have self-identified additional health needs that might impact on their cognitive functioning.</i></p> <p><i>(Feedback shared with PSD)</i></p>
<p><b><u>AD/2 - Complaint Summary (Discrimination)</u></b></p> <p>Claims his brother had not been adequately informed of bail appearance date changes until after the fact, and as a result he has suffered financial losses due to funding the attendance himself, which he claims as disability discrimination.</p> <p><b><u>Panel Member Feedback:</u></b>  <b><i>Positive feedback - the complaint was upheld (in terms of the failure to communicate) and appropriate action taken.</i></b></p> <p><b><i>Question for PSD - This case has possibly been misfiled under `discrimination` on the grounds of Disability, which only related to the complainants status, and was not really related</i></b></p>	<p><i>On-line submission form:</i></p> <p><i>Discrimination</i></p> <p><i>Does your complaint relate to any of the following? Disability</i></p> <p><i>Assessor has categorised it as discrimination as complainant has stated the complaint relates to his disability, however, Chief Inspector conducting the indication test has stated:</i></p> <p><i>'Having read the above complaint I do not feel that the complainant is alleging discrimination, more the fact that this is causing them expense when they have limited funds therefore, I have not assessed it as discrimination'.</i></p>



Panel Member Feedback	PSD Response
<p><b><i>to the actual crux of the complaint, which was poor communication. There was no evidence of discrimination.</i></b></p>	<p><i>I have put this to Owain Taylor and he has provided the below response:</i></p> <p><i>'I agree, I don't think this complaint is related to discrimination. I will provide this feedback to the Assessor. If the complaint was being dealt with by PSD, the process would be for the PSD IO to amend or contact the assessor to amend the allegation. For complaints that go on area, I don't think we currently have a process, but I will be speaking to my admin team to ask them to raise anything like this with me going forward at Finalisation.</i></p> <p><i>I will also arrange for this complaint to be amended to reflect the complaint accurately.'</i></p>
<p><b><u>PR/1 - Complaint Summary (Discrimination)</u></b></p> <p>The complaint concerns the verbal, physical, and sexual abuse of a 12-year-old mixed-race boy by another pupil. The complainant, the child's grandmother, feels both the school and police failed to respond adequately to repeated reports of bullying and abuse.</p> <p>Despite multiple contacts from the victim's mother, the school did not act, prompting her to involve the police. Initial police engagement was minimal, with delays and reassignment of the investigating officer. Only after the sexual assault and discovery of CCTV evidence did the police and school take the matter seriously.</p> <p>The family believes the lack of action was racially motivated, and the complaint alleges institutional racism within Avon and Somerset Constabulary. The case has been deemed suitable for investigation under the Organisational and Thematic Based Investigation (OTBI) category.</p> <p><b><u>Panel Member Feedback:</u></b></p> <p><b><i>Positive feedback - The unconditional acceptance by the investigating officer as to the failings in the level of service regarding both</i></b></p>	



## Panel Member Feedback

## PSD Response

*timeliness of investigation and the failure of the officers involved to instigate actions or measures to improve this situation. The final outcome of the school, police, parents and other agencies involved all working together to achieve a change in the perpetrators attitude a desirable outcome.*

**Question for PSD - At each stage of escalation of the bullying there were missed opportunities by the police for intervention. I would argue that it is in the best interest of the public interest that these incidents are nipped in the bud early. Why did the CID not sign post to other agencies who could have helped at an earlier stage?**

**Will the designation of a named community office as promoted by the government make a different?**

*The intervention was completed by the school which is appropriate.*

*The Niche record shows that the OIC liaised closely with the school and had a meeting with the Principal. The school had actioned a number of interventions and sanctions with the boys. There had been no further incidents.*

*The school has procedures it implements for children displaying sexualised behaviour and/or racist attitudes.*

*Safeguarding referrals completed for both boys.*

*I can't comment on the impact as there will be many factors to consider, However, it would not change the outcome in a case like this. The guidelines from the NPCC and Home office is that police intervention with school children should be a last resort and incidents happening at school should be dealt with by the school. If it comes to police notice it is usually because a parent is unhappy with how the school have dealt with it. In which case we will record the matter and liaise with the school to check their response has been appropriate.*



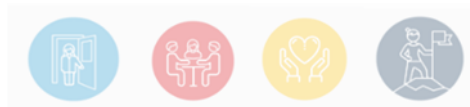
# STOP & SEARCH COMPLAINT CASES

## – QUARTER 1 (Jan-Mar 2025)

If any queries or concerns are identified during the analysis of Stop and Search cases, they will be highlighted within this report and referred to the Independent Scrutiny of Police Powers Panel. The panel will then review the issues, provide analysis, and offer feedback to support transparency and accountability in the use of police powers.

Panel Member Feedback	PSD Response
<b><u>KS/1 - Complaint Summary (Stop &amp; Search)</u></b>	
<p>When involved in Stop &amp; Search Complainant alleges:</p> <ol style="list-style-type: none"> <li>1. car was boxed in, nearly hit, officer rude &amp; shouting at them</li> <li>2. handcuffed in front of children &amp; prevented from tending to them</li> <li>3. even when C proved she was the new owner, she was told that her driving was suspicious, and she was kept in tight handcuffs and searched in front of passing cars which made her feel uncomfortable and intimidated.</li> </ol>	
<p><b><u>Panel Member Feedback</u></b></p> <p><b><i>Negative comments</i></b> - Not all parts of Allegations 2 &amp; 3 are covered in the response</p>	<p><i>This is sometimes an issue with the non-schedule 3 complaints when supervisor responses to the assessors are not detailed enough. I will feed this information to Owain Taylor.</i></p>
<p><b><u>Question for PSD - Re Allegations 2&amp; 3:</u></b></p> <ol style="list-style-type: none"> <li>1. Niche records reason for the stop was the ANPR marker. If, as C states, she was able to prove that she was the new owner of the car, why did the reason then change to suspicious driving?</li> </ol>	<p><i>It was a combination of an Intel marker and the fact the car had been driven from WSM into Knowle West, driven around Knowle and then headed back to WSM, this was the suspicious driving they have referred to and indicated potential drug dealing on the day along with the previous information relating to drugs.</i></p>
<ol style="list-style-type: none"> <li>2. Does the record explain what was suspicious about C's driving, and the grounds to proceed to a search?</li> </ol>	<p><i>Yes, as above.</i></p>
<ol style="list-style-type: none"> <li>3. Why was C kept in handcuffs? BWV showed that the complainant was compliant throughout. The IO response states "Attending officers handcuffed the driver and front passenger in order to conduct a stop &amp; search."</li> </ol>	<p><i>Routine/default handcuffing is not considered acceptable by A&amp;S, however a decision to handcuff does remain with each individual officer to justify and in the context at the time. So, for example, an officer's personal experience</i></p>





## Panel Member Feedback

## PSD Response

*The A&S guidance states: Routine and default handcuffing should not be the 'norm' Handcuffing was not addressed in the final response.*

*of previous stop searches and/or their physical size and gender etc could be considerations for them when deciding to use handcuffs. The demeanour of the subject being searched is a major factor but not the only one officers consider when handcuffing. With drug stop searches where drugs can be hidden very easily anywhere on the person and in clothing and removed quickly either to dispose of or digest, officers may decide to use handcuffs. The purpose is not to prevent violence or escape it's to prevent disposal of drugs.*

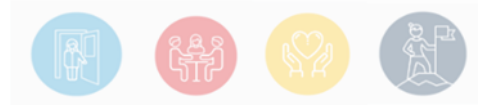
**ACTION** – Panel member request the Independent Scrutiny of Police Powers Panel (ISoPPP) review this case to ascertain why the female was handcuffed in this instance?



## Comments Head of PSD Supt Larisa Hunt

*I hope that you benefitted from the presentation at the last meeting where Owain Taylor and his colleague spoke about our complaint handling times and the role of the assessors. Since then, I can tell you that they continue to drive our timely response to those who are dissatisfied with the service provided by the police. During our Summer period, the number of outstanding matters to be assessed had increased which is a regular seasonal trend. However, between the 20th October and the 7th November this year, 141 Complaint Cases have been finalised with 82% (116) being handled outside of Schedule 3. There are benefits of cases being dealt with outside of Schedule 3 because they are dealt with in a timely manner and do achieve a resolution. This is good work by the team. As a result of the recent HMICFRS Inspection, we are recruiting an additional Inspector to line manage the Assessors and oversee handling decisions. This Inspector will also take on the great work completed by Louise Pressly when she retires, therefore officially formalising this ongoing partnership between the panel and PSD for the future. I hope to be able to provide you with our most recent performance data at the next meeting. I want to thank you as ever for your time, attention to detail and very important feedback. This adds value to the service we are able to provide, and I am very grateful for all of the hard work you do to help us improve the service we provide to our communities.*





## Further information about the Independent Scrutiny of Police Complaints Panel (ISPCP)

Further information about the ISPCP can be viewed through the following link:

[Independent Scrutiny of Police Complaints Panel | OPCC for Avon and Somerset \(avonandsomerset-pcc.gov.uk\)](https://www.avonandsomerset-pcc.gov.uk)

## Get in touch

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