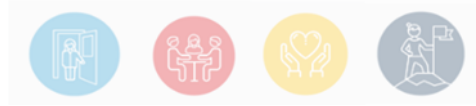


Independent Scrutiny of Police Complaints Panel

June 2026



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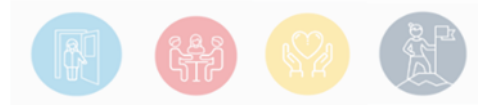
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Purpose of the Independent Scrutiny of Police Complaints Panel

The Independent Scrutiny of Police Complaints Panel (ISPCP) consists of 14 independent panel members, some of whom are 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 (ASC) 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.'

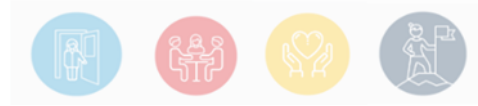
Further information can be found [on our website](#).



STRUCTURE OF THE SESSION

Ahead of the meeting, the Panel conducted a detailed review of 20 completed complaint files. During the session, it undertook thematic scrutiny focused on Police Powers, policies and procedures. This theme considers how police officers apply their statutory powers in practice, including adherence to legislation, force policies, and operational guidance, as well as the consistency, fairness, and proportionality of decision-making in interactions with the public.

In addition, the Panel reviewed two Stop and Search complaint cases for Quarter 4 (October–December 2025), which formed part of the overall sample of 20 cases. This work remains aligned with the Panel's commitment to delivering a key recommendation from Desmond Brown's report



Identifying Disproportionality in the Avon and Somerset Criminal Justice System (published on 23 February 2022). The report highlights the need to address disproportionality within the criminal justice system, particularly in police encounters involving minoritised communities.

The Panel engaged in an in-depth discussion of the cases scrutinised. Larisa Hunt, Head of PSD, attended the meeting and provided an update to the Panel, offering valuable insight and context to support the review process. She was supported by Inspector Matt Reed.

Panel Attendees – KS, BK, PR, AD, LC, KF, JR, OH, JT, JB, SB, JFT
Apologies – EK, JSG

OPCC – Update (Sally Fox & Karl Parfitt)

Sally Fox, Director of Performance & Accountability, attended the meeting in person, whilst Chief of Staff Karl Parfitt joined remotely. The OPCC provided an update on current and emerging areas relevant to scrutiny.

It was noted that forthcoming legislation remains subject to ongoing consultation, with no significant developments to report at this stage.

Members were informed of the recent Volunteers' Celebration Event held in May, which was positively received and provided a valuable opportunity to recognise the contribution of volunteers. The event also supported a broader understanding of areas of effective practice, alongside identifying opportunities for further development within volunteer-led scrutiny. The OPCC noted that a number of suggestions and ideas were captured from the event, and that further work will be undertaken to explore how these can be developed and implemented.

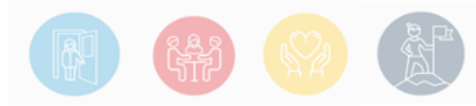
Looking ahead, the OPCC highlighted ongoing uncertainty regarding the future of volunteer scrutiny arrangements beyond May 2028. It was noted that greater clarity will be required at both regional and national levels to understand how scrutiny functions will be sustained and developed.

Karl Parfitt, Chief Executive Officer, introduced himself to the Panel, outlining his background of over 30 years as an Army officer and his experience within defence, which will support his contribution to scrutiny and governance. An update was also provided on anticipated changes to governance structures, with scrutiny functions expected to transition under the Police and Crime Board. While core scrutiny functions are expected to remain in place, further detail is required to understand how these will align with future resourcing and organisational arrangements.

Useful Reading

You can read more about the Government White Paper by clicking on the following link - [From local to national: a new model for policing - GOV.UK](#)

Published by the Home Office on 26 January 2026, this white paper sets out comprehensive reforms to policing in England and Wales to enable policing to better deliver for the public.



Professional Standards Department Update, Head Of PSD Supt Larisa Hunt



Larisa Hunt, Head of PSD, provided an overview of current performance, priorities and emerging issues within Professional Standards.

Concerns were noted regarding the **quality and consistency of investigations and supervisor reviews for investigations relating to domestic abuse**, with this identified as an area for ongoing focus. PSD continues to promote learning through the development of “bite-sized” training materials, including new videos on professional curiosity for officers attending domestic abuse incidents which have been released to Response Teams. It was confirmed that additional material produced internally can be shared with the Panel.

An update was provided on work linked to the **IOPC Youth Panel Manifesto and child-centred policing**, noting a transition to a revised framework. Activity is ongoing to strengthen safeguards for children, including training for officers and a continued focus on the appropriate use of Body Worn Video during Stop and Search, as well as scrutiny of more sensitive practices such as intimate searches involving young people. PSD will also be engaging with the IOPC to review referral processes relating specifically to complaints involving children.

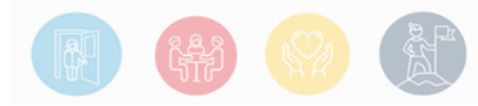
Updates were also provided in relation to HMICFRS Areas for Improvement. Progress is being made to strengthen complaint and conduct decision-making processes (AFI3), improve the handling and management of

complaints and allegations (AFI4), and develop a better understanding of disproportionality within complaint handling (AFI5). It was acknowledged that while disproportionality can be identified, there remains more work to do to fully understand and evidence its root causes. Data retention remains a challenge, particularly in ensuring appropriate records are available while remaining compliant with retention requirements.

Performance data indicates an **18% year-on-year increase in recorded complaints**. This is attributed to a range of factors, including increased scrutiny, growing complexity (including AI-related matters), and broader changes in demand. Despite this increase, there has not been a corresponding rise in misconduct outcomes. The Panel noted concern regarding the upward trend in complaint volumes. PSD reported that 65% of scheduled complaints were handled outside of Schedule 3.

The relationship with the IOPC remains **positive**, with **referral quality noted as strong**, although demand continues to fluctuate depending on case type. Progress is being made in **reducing backlog cases**, although pressures remain, particularly in light of **potential reductions in PSD resources**.

Finally, assurance was provided regarding the use of AI, with PSD confirming that **appropriate safeguards are in place to prevent data breaches** and ensure sensitive information is handled securely.



Guest Speaker, Ali Price - Lead Trainer: Public and Personal Safety Training, Avon and Somerset Constabulary

Ali Price delivered an overview of Police Use of Force training, centred on the application of the National Decision Model (NDM) as the framework underpinning lawful and proportionate decision-making. The NDM supports officers at both operational and strategic levels, starting with a clear focus on legality, ethics, and acting in the public interest.

The model emphasises a structured approach, including gathering information and intelligence, assessing threat and risk, considering powers and policy, identifying options and contingencies, and ultimately taking appropriate action. The importance of officers' situational awareness and use of their senses in forming decisions was highlighted.



Training was described as scenario-based, with officers currently receiving around 12 hours annually. It was noted that while some forces are reviewing this provision, there is an aspiration for more frequent and immersive training, ideally beyond current levels, to support decision-making becoming instinctive in high-pressure situations. De-escalation was identified as a consistent “golden thread” running throughout all training.

Discussion also explored supervisory oversight and learning, particularly given a workforce with a high proportion of less experienced frontline officers.

Figure 1 – National Decision Model, UK Police

While supervision is mandated and generally well complied with, the quality and consistency of reflective learning varies. Wider considerations, including safeguarding, vulnerability, and internal reporting mechanisms, form part of the learning and review process.

Useful Reading

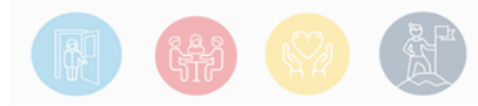
You can read more about the National Decision-Making model by clicking on the following link - [National decision model | College of Policing](#)



MONITORING AND OVERSIGHT LOG

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

N o	Date	Action (OPCC, ASC, Panel)	Progress update	Close/ Ongoing/ Keep In View
1	2022-09	PSD to provide the Panel with updates arising from learning activity, together with a briefing on any recent complaint statistics of interest. This should include relevant information from IOPC quarterly bulletins and the Annual Complaints Report (ASC).	Learning meetings no longer take place. Instead, all organisational learning is now recorded centrally via Centurion and PSD's Organisational Learning Form, with each item owned and tracked by the Organisational Development Team to ensure follow-up. Key themes are escalated quarterly to the Confidence & Legitimacy Committee for oversight. Learning is shared locally through PSD newsletters, Federation vlogs, and internal communications and team briefings.	● Keep in View (KIV)
2	2024-06	An Individual Learning Tracker has been created to ensure individual feedback is provided to complaint handlers. (ASC & OPCC)	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. Panel would welcome continued feedback on how learning is embedded in practice, including evidence that feedback is provided directly to named individuals.	● Ongoing
3	2024-09& 2026-03 & 06	IOPC Youth Panel Manifesto 2030 . Sets out 10 major reforms to improve young people's trust & confidence in the policing & police complaints system (ASC)	ISPCP agreed to keep this in view as an ongoing action, seeking updates from PSD on how elements of the manifesto could be implemented.	● Keep in View (KIV)



4	2024-09	Otherwise Than By Investigation Workshops (PSD)	Workshops ran in 2024/25. However, a mid-line leaders course has now been introduced which has OTBI input, although MR will provide focused input where needed.	● Keep in View (KIV)
5	2025-03	Police Integrity Inspection Feb 2025 (PSD)	Performance Data shared by LH to be circulated to panel. Progress against HMICFRS recommendations will be shared on a routine basis.	● Keep in View (KIV)
6	2025-12	ISoPPP Referral UoF/ASB – Special Case Review	Supplementary BWV obtained & shared with sub-panel (DB, BK, KF) 25.03.26 - for feedback if deemed appropriate.	● Ongoing
7	2026-03	PSD Disproportionality Data	Panel to be kept informed of any opportunities to improve this data-quality set.	● Ongoing

Panel Recommendations

Recommendation - Improve outcome letter accessibility: Introduce a summary at the start of OTBI outcome letters and continue to promote plain English and accessible communication.

Recommendation - Reduce use of jargon & increase empathy in responses: Continue efforts to minimise acronyms and police-specific terminology in correspondence. Ensure complaint responses consistently demonstrate empathy towards complainants.

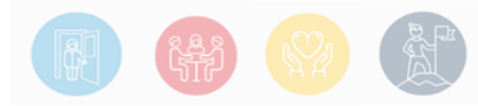
Recommendation – Strengthening informal resolution standards: the panel expressed concern at the practice of resolving informal complaints by simply reproducing an officer's email response without additional commentary or analysis. This will be raised with Complaint Assessors.

Professional Development

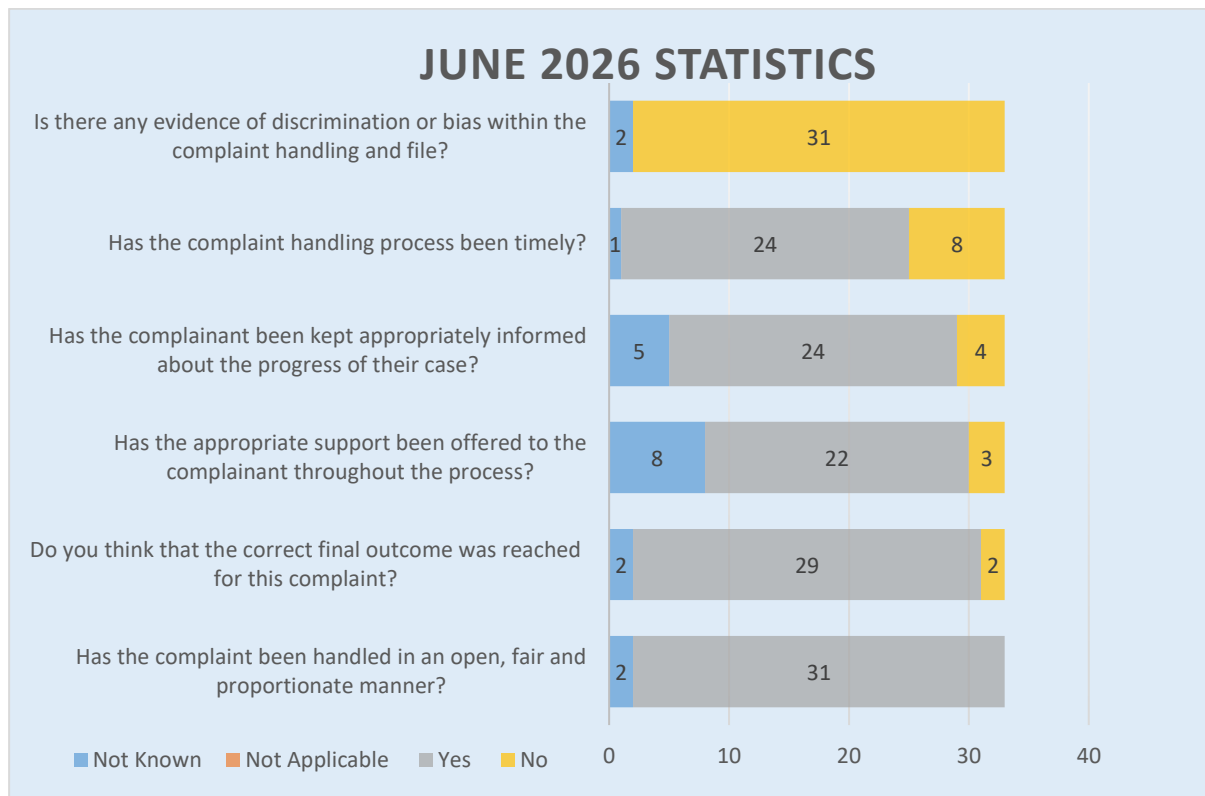
Developmental feedback was issued to 3 Area Complaint Handlers to support continuous improvement.

Recognition of Excellence

Positive feedback was provided in 3 cases where complaint handling demonstrated a high standard of practice.



STATISTICAL ANALYSIS



This chart reflects responses to the six feedback questions, based on a sample of 20 cases. Panel members record 'not known' where the case file lacks enough detail for a clear yes or no.

Quarterly Complaint File Review – June 2026 Summary

Across the 20 sampled cases (33 reviewer assessments), complaint handling was viewed positively, particularly regarding fairness, proportionality, outcomes and the absence of bias. **The main areas for improvement are timeliness, evidencing support provided to complainants, and documenting communication throughout the process.**

✅ **Handled Fairly & Proportionately:** 31 of 33 reviews (94%) found complaints were handled fairly and proportionately, with no negative findings.

🎯 **Correct Outcome Reached:** 29 of 33 reviews (88%) concluded the correct outcome was reached; 2 disagreed and 2 were unable to determine.

🤝 **Support Offered to Complainants:** 22 of 33 reviews (67%) found appropriate support was provided; 3 did not and 8 were unable to determine.

🗉 **Complainants Kept Informed:** 24 of 33 reviews (73%) found complainants had been kept appropriately informed of progress, although 4 reviews identified shortcomings and 5 were unable to assess this.

🕒 **Timeliness:** 24 of 33 reviews (73%) found complaint handling was timely, while 8 identified delays.

🔍 **Discrimination or Bias:** No reviews identified evidence of discrimination or bias; 31 of 33 reviews (94%) found none was present, while 2 reviews were unable to make a determination.

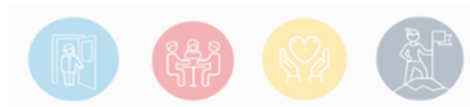


HIGHLIGHTS OF CONCERNS, QUESTIONS OR ISSUES RAISED BY THE PANEL – THEMATIC - DISCRIMINATION

Panel Member Feedback	PSD Response
<u>JB/JF-T 1 - Complaint Summary (Police powers, policies & procedures)</u> 7 elements to the complaint: Complainant was dissatisfied with the way in which the police handled their arrest; why 3 police officers were involved in the arrest; that they were not shown a pertinent statement from a relative; why the father had not been spoken with in relation to the enquiry; in that they had not received a pertinent response which had been sent digitally; query as to whether the police officers had a warrant to search their property; querying individual police officer's behaviour and the processes undertaken; conflicting comments made by officers to the complainant regarding information received. <u>Panel Member Feedback</u> <u>Positive comments:</u> <i>JB - Correspondence to the complainant was detailed and written in a manner that would be easily understood. Each element of the complaint was thoroughly explored and treated seriously. The final letter closing the complaint outlined each element of the complaint with the investigating officer's conclusion and how the conclusion was reached. Where the service was found to be unacceptable by the officer in question, a learning outcome for the officer was actioned.</i>	



Panel Member Feedback	PSD Response
<i>Response author offered the opportunity to get in touch if further questions or required additional support which felt genuine.</i> <u>Questions from panel members:</u> <i>JB - It is disappointing that a continuity process has not internally been developed that ensures when a change in investigating personnel occurs, 'open' complaint investigations do not fall between the cracks.</i> <i>Final complaint letter was very good, detailed and thorough, it was noted however that an acronym. OIC had been used without an initial explanation.</i> <i>JF-T - The system through which communication to and from the inspector requires improvement as there were clear delays between and within teams resulting in further cause dissatisfaction from the complainant.</i> <i>What are the reasons as to why the communication to and from the inspector was delayed?</i> <i>Informally dealt with 15/05/25 - Then formally recorded</i> <i>Complaint formally recorded 10/06/25</i> <i>Final Letter 10/09/25</i>	<i>When complaints are allocated to area managers to deal with, PSD are reliant on being informed if a change in complaint handler occurs. This is a vulnerability and a recent audit revealed several old complaints that had been missed and not progressed in these circumstances.</i> <i>Insp Reed will discuss with PSD Operations manager to discuss solution. It may be that a more regular audit of outstanding complaint, may identify these cases more quickly.</i> <i>The complaint was dealt with in just under 90 days, which is considerably within the desired 120 days. The complaint handler is a uniform response Inspector (Critical Incident Manager). This role involves working a rotating shift pattern, including night shifts, responsibility for a large team of police officer and a large geographical area. A known vulnerability is patrol Inspector's regularly having to 'double-base' meaning they are regularly expected to manage two geographical bases at once, due to a shortage of officers available to cover this role. It is one of the busiest and most pressurised roles in the force and it is likely that this contributed to the delay in communication.</i>



Panel Member Feedback

PSD Response

LC/JT 2 - Complaint Summary (Police Powers, policies and procedures)

Mother complains that her son was not assessed by a health care professional to ensure her son was fit for interview; she was not informed when he was released from custody; she spoke to a very rude female police officer when she rang to find out when her son would be released from custody; she was asked to call her son's father to see if he was there after he was released (they have a toxic relationship and he shouldn't be there) and also she was dissatisfied with the length of time that her sons property had been retained for.

Panel Member Feedback

Positive comments:

LC - Thorough investigation into the allegations, and comprehensive final letter with genuine apology where allegation could not be upheld (rude female member of staff) due to inability to identify who the female was.

JT - The final outcome letter was very detailed and provided information focusing on the actions the IO had taken to reach his conclusions and rationale.

The investigation had been thorough and the apology given seemed genuine

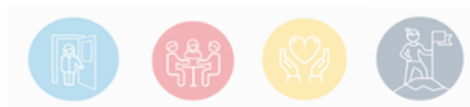
Questions from panel members:

LC - C Formatting on the final letter (pages 3-6) is not ideal. There were better versions of the "What you told us" Initial email within the documents - the version used did not look professional for an external document. Also formatting on the "Reasonable and Proportionate Handling Explanation" pages are central justified,

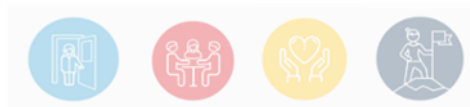
The formatting of the final letter is poor and does not look professional. The complaint was handled by an Inspector from area, rather than PSD. Improvement work being undertaken to improve the quality of complaint handling by area staff.



Panel Member Feedback	PSD Response
<i>not left justified, and is difficult take in the information as it doesn't flow well to the eye, and looks unprofessional on an external document.</i>	
<u>SB-1 - Complaint Summary (Police powers, policies & procedures)</u> On the face of it, complainant complains that her 16-year-old daughter was not treated with empathy and understanding during an incident in which the daughter climbed a viaduct which is a known suicide spot having taken 13 paracetamol and was likely experiencing a mental health crisis. The complaint is that the attending officers treated her like a criminal and handcuffed her and did not respond appropriately with empathy or utilise any of their safeguarding powers. Very unusual situation in that initial investigations about the complaint then revealed that the mother did not in fact make the complaint and the suspicion is that the daughter made the complaint herself whilst pretending to be her mother. It appears that she has a history of doing similar things. On that basis, the complaint from the mother was filed as withdrawn and an offence of malicious communication recorded against the daughter. However, PSD advised that the complaint about the arrest should still be investigated locally on the basis that the daughter had been arrested and was complaining about it. <u>Panel Member Feedback</u> <u>Positive comments:</u> <i>This was an unusual situation, and I was pleased to see that the daughter's complaint</i>	



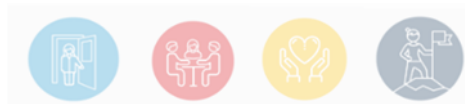
Panel Member Feedback	PSD Response
<i>would still be investigated because potentially the issues raised about her arrest are serious.</i> <u>Questions from panel members:</u> <i>Are PSD able to confirm that the daughter's complaint about her arrest was indeed investigated and what was the outcome?</i>	<i>It is unclear why the complainant lodged the complaint, pretending to be her mother. The mother was contacted and confirmed that she had not made the complaint. The 16-year-old subject was not updated or informed. She was not forthcoming with a complaint. Whether she should or shouldn't have been approached to see if she wanted to make a complaint is a point for discussion.</i> <i>Further discussion during panel meeting – Action for PSD to feedback to the complainant handler that they should have contacted the complainant in this instance.</i>
<u>SB-2 - Complaint Summary (Missing Persons)</u> Complainant's now ex-wife called the police, stating that C was trying to commit suicide (which he denies). Essentially the complaint is that the police sent more resources to the house than was necessary and that whilst some officers were dealing with the matter, other officers smuggled complainant's children out of the back of the house. <u>Panel Member Feedback</u> <u>Positive comments:</u> None <u>Questions from panel member:</u> <i>The final letter is very scant and essentially states that the investigating officer reviewed niche, spoke to the officers and was satisfied that the officers had used their police powers appropriately. I could not see from the file that there was any report which might have accompanied the</i>	<i>This was a poorly handled complaint. The outcome letter is inadequate. There is nothing to suggest that the complaint handler spoke to or otherwise contacted the complainant to try to better understand their concerns. No detail was given about what information the complaint handler looked at, what it showed or what the</i>



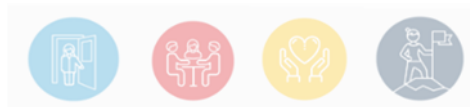
Panel Member Feedback	PSD Response
<i>final letter as is sometimes the case. If the only response to the complainant was that contained in the final letter, then I do not think the letter contains enough detail for the complainant to understand the conclusion that the service level was acceptable. This is supported by the fact that it would appear that the complainant is now asking for the complaint decision to be reviewed.</i> <i>The copy of the letter on Box has various details relating to the right of review which have not been completed.</i> <i>Assuming that there is nothing other than the final letter, then I would have wanted to have seen an explanation of the reasoning underlying the decision to dismiss the complaint.</i> <i>Please would PSD comment upon the adequacy of the response to this complaint and update on what has happened with the requested review.</i> <i>Also, did the final letter go out without the details in the Right of Review section being completed?</i>	<i>attending officers said about the incident. There was no rationale as to why the complaint handler decided the service level was acceptable. The outcome letter did provide details of how to appeal (PDF attached to outgoing email.) When the complainant replied, dissatisfied with the outcome, he was provided with appeal information again. Unfortunately, there is no record of an appeal being lodged, so the matter was not looked at again. Had it been appealed, the appeal would undoubtedly have been upheld. Feedback will be provided to the complaint handler through line management.</i> <i>Further discussion during meeting, PSD to consider writing to the complainant if resources allow to follow up this complaint.</i>
<u>AD-1 - Complaint Summary (Police powers, policies & procedures)</u> Complainant alleges poor treatment of DP during custody. <u>Questions from panel member:</u> <i>It was accepted there had been a breakdown in communication between the arrest and custody, which likely contributed to the escalation witnessed in custody.</i>	



Panel Member Feedback	PSD Response
<i>Later correspondence to the DP also appears to have resulted in further distress.</i> <i>A lack of internal communication and failure to handover pertinent information negatively contributed to this incident. In hindsight it is easy to find the cracks in a system that appeared to heavily rely on effective handovers. Has this improved?</i> <i>I suspect trying to fix a process that involves different departments within the same organisation, with staff working shifts, and multiple points of contact, is not going to be simple.</i>	<i>I can find no explanation as to why this matter took so long to finalise. It was relatively complex, but not to justify a gap of 3 years.</i> <i>Custody handovers are under continuous review for improvement. For example, organisational learning, provided by the OIC recently influenced a change in process as to how detainee's medical information is handed over between shifts.</i>
<u>KS & JR-3 - Complaint Summary (Police powers, policies & procedures)</u> Complainant was found drunk, distressed and wandering in the road having taken an overdose. An ambulance was in attendance, but he was refusing to get in, so they requested police assistance. He was then taken to hospital using the powers of s3 of the Mental Capacity Act Complainant states 1. He was manhandled slammed onto a stretcher was not resisting arrest, assaulted, had very bad bruises 2. He was arrested by 4 officers. No reason given. <u>Panel Member Feedback</u> <u>Positive comments:</u> <i>JR - Complaint handled appropriately outside schedule 3, there is a prompt and meaningful response by the complaint handler who explains the process to the complainant.</i>	



Panel Member Feedback	PSD Response
<i>Updates were proactively given regarding timings.</i> <i>Statements were sought from the appropriate parties and BWV footage was sought and referenced in the response.</i> <i>KS - The complaint triggered a welfare visit to see the children at grandparents' house by A&S officers</i> <u>Questions from panel member:</u> <i>JR - The final response did not give a clear outcome.</i> <i>The response was the reports by the relevant officers which had heavy use of acronyms and ultimately did not explain why the conduct was deemed to be acceptable.</i> <i>Given that the complainant reported she had mental health issues I think a 'plain language' summary may have been warranted.</i> <i>KS - 1. Are the responses to the safeguarding concerns raised by C sufficiently robust? For example, during the welfare check it is noted that a child was "disciplined physically once when they had done something bad, but no dates or reasons provided so this may meet the context of reasonable chastisement." This conclusion is an assumption, the statement is vague, and there is no evidence that the physical chastisement was explored. This suggests that the officers were not sufficiently curious.</i>	<i>The response was inadequate. A summary of the incident and explanation of the police action should have been provided. When the complainant replied to the outcome, clearly still dissatisfied, an option to have the matter raised formally should have been provided. Feedback will be provided to the complaint handler.</i> <i>(see response above)</i>



Panel Member Feedback	PSD Response
<i>(Reassurance of the safety of the children was provided by the fact that child services visited between the complaint and the welfare check by the officers.)</i> 2. Given the poor quality of this response email, are PSD staff given guidance and support about how to write a good response? ISPCP have regularly raised the importance of the final emails/letters being well written, particularly in relation to the use of cut n paste.	

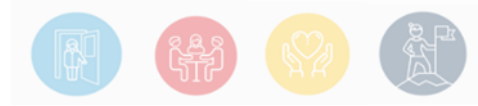


Comments Head of PSD Supt Larisa Hunt

"This was another really productive meeting with lots of valuable feedback collated which Insp Matt Reed then presented to the Professional Standards Leadership Team at our next meeting for discussion a week after the panel. Inspector Reed is running workshops to help those on district handle the complaints they are allocated and has appointments available for one-to-one consultation with staff as well to improve the quality of compliant handling and that includes the feedback from the panel. Feedback from officers on district has been really positive.

I have reported that the number of complaints has increased and this continues to be the case with an 18% increase on the same period of last year. Having said that, initial complaint handling remains strong with first contact being achieved within 7 days and logging completed in 5 days. Outside schedule 3 complaints were resolved in 13 days, faster than our most similar forces. Whilst the volume of reviews requested to the IOPC and OPCC has increased, upheld IOPC reviews have reduced from 31% to 13% and OPCC reviews have reduced from 17% to 8% which suggests that the quality of our complaint handling is improving.

By the time we meet next, I should have further updates regarding the IOPC youth manifesto as I have some meetings arranged with the IOPC and also further updates on our HMICFRS areas for improvement. A big thank you to the panel for their time, commitment and passion for this work. It's a huge benefit to us. See you next time."



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](https://www.avonandsomerset-pcc.gov.uk/independent-scrutiny-of-police-complaints-panel)
([avonandsomerset-pcc.gov.uk](https://www.avonandsomerset-pcc.gov.uk))

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