Consideration	
Public/Non Public*	**Public**
Report to:	**Police & Crime Panel**
Date of Meeting:	**17 November 2025**
Report of:	**Police and Crime Commissioner**
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Agenda Item:	**7**

*If Non Public, please state under which category number from the guidance in the space provided.

COMPLAINTS AND REVIEWS ASSURANCE REPORT

1. Purpose of the Report

1.1 To provide the Police and Crime Panel with assurance that complaints handled by the Nottinghamshire Police Professional Standards Department (PSD) are being managed in accordance with legislation and national statutory guidance.

1.2 To provide an overview of Complaint Reviews completed by the Office of the Police and Crime Commissioner (OPCC) on the Police and Crime Commissioner's (PCC's) behalf.

1.3 The PCC has an oversight responsibility to ensure that complaints handled by Nottinghamshire Police are managed in accordance with the:

- Police Reform Act 2002
- Policing and Crime Act 2017
- Police (Complaints and Misconduct) Regulations 2020/24
- Independent Office for Police Conduct (IOPC) Statutory Guidance 2020

2. Recommendations

2.1 For the Police and Crime Panel to note the learning and findings of this report.

3. Background and terminology

What is a complaint?

3.1 A complaint is any expression of dissatisfaction expressed by or on behalf of a member of the public. It must be made by a person who meets the definition of a complainant. There must also be some intention from the complainant to bring their dissatisfaction to the attention of the force or local policing body. A complaint does not have to be made in writing, nor must it explicitly state that it is a complaint for it to be considered as one.

Complaints Handling

3.2 Complaints received by the PSD can either be handled:

- **Inside of schedule 3** of the Police Reform Act 2002, where the complaint requires further investigation or the complainant requests that it is recorded

- Informally (**outside of schedule 3**), where the complaint is less serious and does not require a formal investigation under the rigorous procedures outlined in schedule 3 of the Police Reform Act 2002. This allows complaints to be resolved more quickly to the satisfaction of the complainant, however, there is no right of review for complaints handled in this way.

3.3 Complaints handled inside schedule 3 other than by investigation (OTBI) are lower-level complaints where it is likely that, if proven, the allegation would not result in further proceedings.

3.4 Local investigations are when the police force investigates the complaint themselves.

3.5 Supervised investigations are when the police investigate, but under the supervision of the IOPC.

3.6 Managed investigations are when the IOPC manages the investigation, which is still conducted by the police (usually the PSD).

3.7 Independent investigations are when the IOPC conducts the investigation themselves for serious complaints.

3.8 The OPCC is the relevant review body in most cases apart from those complaints or conduct matters listed below which the IOPC are responsible for reviewing:

- Any incident or circumstance in which a person has died or suffered serious injury – either directly, or as a consequence of the incident
- A serious sexual assault or offence
- Serious corruption
- Criminal offence or behaviour which is liable to lead to disciplinary proceedings

4. OPCC Dip Sampling

4.1 The OPCC undertakes routine dip sampling of complaints each year to assess compliance. Stop and Search related dip sampling in 2024 identified a lack of compliance with the requirement under IOPC Statutory Guidance to provide updates to complainants within 28 days.

4.2 Dip sampling activity in 2025 has, therefore, focused on 28-day local investigation timeliness in addition to an assessment of the appropriate and proportionate use of complaint resolution outside of schedule 3.

28-Day Local Investigation Complaint Dip Sampling Update

4.3 In 2025, a total of 75 investigation complaint were dip sampled, as outlined below. All complaints had been closed between April 2024 - March 2025:

	No. of Cases
Number of complainants not provided with 28 day update	47
Number of complainants provided with 28 day update	7
Complaints withdrawn	6
Other than by investigation	13
Independent investigation	1
No complainant details	1

4.4 The local investigation dip sample identified that 87% of local investigation complainants were not updated every 28-days as required by the IOPC Statutory Guidance.

4.5 All cases that were withdrawn were due to there being no response from the complainant. There was evidence that public interest tests had been completed and the outcome of all was that it was not in the public interest to proceed with the complaint.

4.6 The sample included 13 complaints that were dealt with within schedule 3 (i.e. formal investigation). This was due to inaccuracies in complaint recording processes via the force's complaint handling system, Centurion.

4.7 One case identified that there were no contact details for the complainant on Centurion. This was due to all contact being with another force.

Outside Schedule 3 Complaints Dip Sampling

4.8 The IOPC Complaints Information Bulletin Quarter 4 2023/24 identified that Nottinghamshire Police dealt with 1,427 (54%) complaint allegations outside of schedule 3. The most similar forces dealt with an average of 968 (33%).

OPCC dip sampling of 100 closed cases has been completed to establish if complaints outside of schedule 3 are being handled appropriately based on the nature and severity of the complaint. 98 (98%) of complaint cases sampled were dealt with appropriately outside of schedule 3.

4.9 One complaint was not dealt with appropriately due to requiring further accounts from officers and the another was withdrawn by the complainant and referred to the Counter Corruption Unit (CCU).

Observations since the last dip sample include:

- 28-days update letters were not being sent to complainants in the majority of cases sampled. This was also identified in previous reports to the Police and Crime Panel.

- The average number of days to finalise an outside of schedule 3 complaint has increased from 16 days last year to 29 this year.

- 7% of outside schedule 3 allegations were closed with no further action which marks a positive improvement on the previous year (33%) and brings Nottinghamshire in line with national trends.

Dip Sampling Recommendations

4.10 Recommendations were made to PSD to consider the below and provide the OPCC with a written update:

a) To review the 28-day update process and provide assurance that updates are being sent to complainants.

b) Consider if any further training is required in relation to the correct drop-down boxes being selected in Centurion.

c) Review the complaint that was not dealt with appropriately outside schedule 3 to identify if any further action is required.
d) Establish why there has been an increase the average number of days to finalise outside schedule 3 complaints.

e) Provide an explanation as to why the number of outside schedule 3 complaints have been closed with no further action has been significantly reduced.

4.11 In responding to the recommendations, PSD confirmed that clear guidance has now been provided to the team regarding the procedures for recording and monitoring 20-day updates. The capacity of PSD has been increased from 4.5 Full Time Equivalent (FTE) staff to 6.4 to improve the management of demand. Staff and supervisory time has been dedicated to re-assessing Centurion records to ensure that the most appropriate method of handling is recorded.

5. Complaint Reviews Breakdown

5.1 For the twelve months (1/4/24 – 31/3/25) the Office of the Police and Crime Commissioner received 123 valid requests for a complaint review. This represents a 20% increase in complaint reviews from the 102 total requests for 2023/4. While this is a significant increase in percentage terms it is consistent with the experience of other OPCCs.

5.2 Of the complaint reviews undertaken, 23 (18.7%) have been upheld. This is a lower percentage than previous years where the percentage of upheld cases has been between 23-26%.

5.3 The average number of days the OPCC has taken to complete a complaint review during the above time period is 12 days. This is down from 13 days for the same period last year. The national average is 52 days.

5.4 It is noted that in a number of the upheld cases, the enquiries carried out by the force were insufficient to address the complainant's concerns and suitable recommendations were made by the PCC to rectify this. In all cases, the PCC's recommendations have been accepted by the force.

5.5 Relevant reviews carried out in 2024/5 include:

A complaint that the police wrongly deleted data from a seized mobile phone following forensic examination. The police determined the service provided was acceptable. The review identified that the complaint handler had not established whether the forensic examination of the device was justified, proportionate or had been properly authorised and further enquiries were recommended. Once carried out it was confirmed that the proper authorisation process was not followed and there was an additional failure in record keeping. In the circumstances it was acknowledged the examination should not have taken place. Learning was identified for an officer and for the team that deal with mobile device examinations.

In another case a complaint was made about how a young man with various disabilities was treated in custody. It was alleged he was subject to unreasonable force and insufficient consideration was given to his particular needs. The police determined the service in respect of these issues was acceptable. Following review, it was identified there was insufficient evidence to have determined the man's needs had been considered and further scrutiny of the justification for use of force was required. It was recommended that the case be reviewed by an experienced custody Inspector. Following the additional enquiries, it was confirmed that the use of force had been reasonable however it was identified that refresher training on autism awareness was required for all custody staff.

6. Financial Implications and Budget Provision

6.1 There are no financial implications or budget provision.

7. Human Resources Implications

7.1 There are no human resource implications.

8. Equality Implications

8.1 There are no equality implications arising from this report, however, there are opportunities to profile disproportionality as part of future dip sampling.

9. Risk Management

9.1 Complaints against the police and the manner in which they are handled are likely to impact on public trust and confidence in the police.

10. Policy Implications and links to the Police and Crime Plan Priorities

10.1 The report links to the Police and Crime Plan governance and assurance priorities.

11. Changes in Legislation or other Legal Considerations

11.1 None

12. Details of outcome of consultation

12.1 The Head of the Force's PSD has been consulted on this report and provided a response to the OPCC as noted in paragraph 4.11.

13. Background Papers (relevant for Police and Crime Panel Only)

13.1 None