

Greater Manchester Police Fire and Crime Panel

Date: 18th September 2024

Subject: Police Complaints and Review Performance.

Report of: Neil Evans, Director, Safer & Stronger Communities, GMCA.

Introduction

1. The purpose of this report is to provide an update on how the Deputy Mayor exercises the statutory responsibilities on behalf of the Mayor to scrutinise and hold Greater Manchester Police (GMP) to account, with reference to the monitoring and overseeing the handling of police complaints. This report aims to offer assurance that the processes in place are effective in ensuring (GMP) addresses complaints and concerns raised by the public with improved quality and consistency. In exercising these statutory duties, the Deputy Mayor is committed to ensuring that the complaints handling process is robust and responsive to the needs of the community.

1.1 Over the past year, significant efforts have been made to enhance the efficiency and transparency of the complaints handling system. This report will detail the number of complaints submitted to GMP in the last 12 months, including reporting period Q1 of 2024/2025, and common themes within these complaints.

1.2 The Deputy Mayor, in conducting the Police and Crime Commissioner (PCC) functions, has implemented several measures to ensure that complaints are handled fairly and promptly. This includes conducting statutory reviews when complainants are dissatisfied with the handling of their complaints by GMP, ensuring accountability and transparency in the process, and working towards restoring and strengthening public trust and confidence in the police complaints system.

1.3 This report will also provide an overview of the police complaints review process, the themes arising from requests to review complaint decisions, and the ongoing efforts to monitor and improve GMP's handling of complaints. Through regular governance meetings and proactive problem-solving initiatives, the Deputy Mayor continues to work closely with GMP to enhance the overall quality of service and to improve public confidence in GMP.

2. Statutory responsibility (scrutiny by the Mayor/Deputy Mayor)

2.1 The Deputy Mayor undertakes several statutory responsibilities related to police complaints reviews on behalf of the Mayor in his capacity as Police and Crime Commissioner:

2.2 Monitoring and Oversight:

The Deputy Mayor is responsible for monitoring GMP's handling of complaints to ensure they are managed effectively and fairly.

She must ensure that the police force adheres to the statutory guidelines and procedures for handling complaints.

2.3 Conducting Reviews:

When complainants are dissatisfied with the initial handling of their complaints by GMP, the Deputy Mayor and her staff conduct reviews to assess the fairness and thoroughness of the process. This is a statutory process underpinned by the Police Reform and Social Responsibility Act 2011, the Police (Complaints and Misconduct) Regulations 2020, and the Policing and Crime Act 2017.

This involves scrutinising the decisions made and the actions taken during the initial complaint handling.

2.4 Accountability and Transparency:

The Deputy Mayor must ensure that the complaints and reviews process is transparent, and that the public has confidence in the system.

She is also responsible for communicating the outcomes of reviews and any subsequent actions to the complainants.

2.5 Extended Monitoring:

The Deputy Mayor has chosen to extend her monitoring of the handling of some police complaints by taking a more proactive with role in certain types of complaints, such as those involving serious misconduct, issues of significant public concern, or cases with a history of prolonged and damaging failings. An example of this is in respect of those complaints that have emerged from the Baird Review, which highlighted significant concerns around police handling of certain cases, or where there have been systemic issues over an extended period. This approach involves working closely with complainants to ensure their voices are heard and that GMP is held to account for addressing and resolving these concerns appropriately. By focusing on these high-impact/high-profile cases, the Deputy Mayor aims to strengthen public confidence and drive meaningful change within the police complaints system.

3. Numbers of complaints submitted to GMP over last 12 months, categories and timeliness.

Total Complaints made to GMP 01/08/2023 – 31/07/2024

Complaint Type	Total
Outside Schedule 3	1731
OTBI (Other Than By Investigation)	1537
PSD (Professional Stabdards Directorate)Investigation	163
IOPC Independent	17
Grand Total	3448

3.1 Outside of Schedule 3 -When a complaint is handled “Outside of Schedule 3,” the complaint is resolved informally and does not follow the formal procedures outlined in Schedule 3 of the Police Reform Act 2002. This typically happens when the

complaint can be quickly and satisfactorily resolved without the need for a formal investigation.

3.2 For example, if a complainant is unhappy with a minor issue that can be addressed promptly via a simple explanation or apology, the complaint may be handled outside of Schedule 3. If the issue cannot be resolved informally, it may later be recorded and handled under Schedule 3. Over half of complaints are informally resolved.

3.3 Other Than By Investigation -Handling “other than by investigation” refers to resolving the complaint through alternative methods than a formal investigation:

3.4 Local Resolution: This involves addressing the complaint at a local level, often through direct communication with the complainant to resolve the issue quickly and informally.

3.5 Reflective Practice Review Process: This is used for less serious complaints where the focus is on learning and improving practices rather than formal disciplinary measures.

3.6 These methods aim to handle complaints in a way that is proportionate to their seriousness and can often lead to quicker resolutions.

3.7 Timeliness

Ave Work Days Taken	
Outside S3	13
OTBI	59
PSD Investigation	145

3.8 GMP currently assess time taken to complete complaints handling by “average work days taken”. Whilst some cases can be very complex, and require thorough investigation and analysis, it is widely agreed that these timescales need to be brought down to more acceptable timeframes – for both the benefit of the complainant, and any staff involved in the process.

3.9 Ongoing continuous improvement activity is at the forefront of PSD’s working, and additional resources have been provided to the Directorate to tackle long wait times and workloads. The Office of the Deputy Mayor continues to offer support and scrutiny with a view to assist in these improvements.

4. Themes arising in overall complaints to GMP.

Top Ten Complaint Categories to GMP since recording started

Allegation Type	Total	%
Police action following contact	3191	28%
Information	890	8%
Use of force	861	8%
Decisions	806	7%
Unprofessional attitude and disrespect	643	6%
Detention in police custody	506	4%
Power to arrest and detain	427	4%
Impolite language/tone	421	4%
Impolite and intolerant actions	408	4%
Handling of or damage to property/premises	370	3%

4.1 Overlaying information from GMP as well as that publicised by the IOPC for Q1 24/25 shows that main recurrent themes specifically for the last 12 months are.

4.2 Quality of Service: A significant portion of complaints pertain to the perceived quality of police services. This includes concerns about response times, professionalism, and the effectiveness of police actions.

4.3 Conduct and Behaviour: Complaints about the conduct and behaviour of police officers are prevalent. These include allegations of misconduct, inappropriate behaviour, and breaches of protocol.

4.4 Communication Issues: Many complaints highlight issues with communication between the police and the public. This includes delays in providing updates, lack of transparency, and perceived unresponsiveness, including within the complaints process itself.

4.5 Procedural Errors: There are instances where procedural errors or lapses have been reported. These complaints often involve administrative mistakes, incorrect handling of cases, or failure to follow established protocols.

4.6 Public Trust and Confidence: Overall, the themes indicate a need for improving public trust and confidence in the police. Addressing the root causes of these complaints is essential for enhancing the relationship between GMP and the community it serves.

5. Police review process

Where a complaint has been recorded under Schedule 3 to the Police Reform Act 2002, the complainant has a right to apply for a review of the outcome of the complaint. This applies whether the complaint has been investigated by the 'Appropriate Authority' (GMP PSD) or handled otherwise than by investigation. The review will consider whether the outcome of the handling of the complaint is reasonable and proportionate. Where the 'relevant review body' finds that the outcome of the complaint is not reasonable and proportionate it will uphold the review.

5.1 The Independent Office of Police Conduct (IOPC) is the 'relevant review body' in more serious cases, and all other cases, the 'relevant review body' will be the 'Local Policing Body' (GMCA).

5.2 In March 2023 the Police Complaints Review Team within GMCA had over 150 outstanding reviews. This was due to staff sickness and retirement. A specialist provider was commissioned (SANCUS) to assist. Work commenced to reduce the

backlog and in September 2023 a new Manager (Ian Lees) was appointed and took up his position at the beginning of January 2024.

5.3 Since that time the team has worked hard to reduce the backlog and improve timeframes, and as of August 2024 the position is now excellent. All reviews are now turned around within 14-28 days and there is no backlog. As a result, proactive problem-solving work has begun to better scrutinise how GMP handles complaints.

5.4 GMCA position since September 2023 -

- 257 review requests were received by the team, of that number (including some previous cases):

There were 304 cases which were handled:

- i. 123 were not upheld
- ii. 71 were not upheld but considerations were raised with GMP
- iii. 110 were upheld with recommendations made to GMP

5.5 Overall performance monitoring indicates that:

- 36% of reviews are upheld with recommendations
- 23% of reviews are not upheld, but considerations are raised with GMP
- 40% of reviews are not upheld.

6. Themes arising via request to review complaints decisions

The main themes that are found in upheld complaints are:

- Complaint not fully understood due to no or limited contact with complainant
- Each individual allegation raised not being responded to
- Wrong outcome – siding with the officer when there is no other evidence

- Lack of an apology
- Lengthy timescales in handling complaints (especially those passed to Districts to conduct).

7. How we monitor with GMP

There are two quarterly governance meetings with GMP and there is regular liaison between the PSD and the GMCA Review Team for issues that cannot wait until the meetings.

7.1 The first is the Deputy Mayor's meeting with the Deputy Chief Constable, supported by officers and officials. The objective is to discuss key themes in recommendations from review outcomes, for GMP to provide updates on specific cases and on conduct investigations over 12 months old. Quarterly PSD performance data is also discussed.

7.2 The second meeting has a more operational focus and is attended by the Police Review Team alongside a Detective Chief Inspector from the PSD, and relevant PSD staff. Similar themes and performance are discussed along with any barriers and suggested changes to working practices to improve performance. The Review Team works closely with the PSD in order to strive for a better customer experience overall.

7.3 The PSD has also recognised that there are issues with quality and timelines of complaints that are handled in Districts and in April 2024 it introduced new measures to try and improve this. A new monthly governance meeting has been set up with Districts and performance data is more closely monitored, though improvements in certain Districts and Branches, notably Criminal Justice and Custody. It is too soon to quantify the overall success of this initiative and the Deputy Mayor will continue to monitor this new approach.

8. PSD Change Programme.

A significant PSD Change Programme has recently commenced, in part driven by the findings from the Deputy Mayor's scrutiny and oversight and the resulting conversations with the GMP. With support of her team the Deputy Mayor has identified several areas for potential development in terms of PSD practices and processes which were leading to additional work (failure demand), inaccurate data recording and subsequent further dissatisfaction. Several changes have been suggested, which it is considered would improve practices and therefore customer service, some of which have been accepted, and some are subject of further dialogue.

8.1 There remains work to be done in terms of the overall scrutiny of how GMP handles complaints. This work includes developing a process of dip sampling the handling of recent complaints that have not been subject of review requests, amongst others.

9. Chief Constable complaints

The 'appropriate authority' for a complaint or recordable conduct matter that relates to the conduct of a Chief Constable or acting Chief Constable is the local policing body with responsibility for that police force area. For GM the local policing body is GMCA.

9.1 It important to note that GMCA can only handle complaints that relate to the conduct of the Chief Constable. There will be times where a complaint names the chief constable or acting chief constable, but the complaint is about something where authority has been delegated to another officer or staff member within the force. Where the local policing body receives a complaint for which is it is not the appropriate authority, they must forward the complaint to the appropriate authority - GMP PSD.

9.2 Since September 2023, there have been very few complaints about Chief Constable Watson. None have met the criteria for a Chief Constable complaint, as they pertain to other organisational issues under his delegation rather than his own conduct or behaviour.

10. Conclusion

It is asserted that significant strides in improving the handling and review of police complaints have been made in recent times. Proactive measures have been implemented by the Deputy Mayor and her team aimed at enhancing transparency, accountability, and public trust in the complaints process. While challenges remain, particularly in addressing procedural errors and communication issues, the ongoing commitment of GMP to address them, and the work of the Deputy Mayor and her team to monitor, improve and support these processes are noteworthy.

10.1 The commitment to continuous improvement and the recent reduction in review backlogs demonstrate a positive trajectory towards a more efficient and responsive complaints system. Moving forward, the focus will remain on maintaining high standards of service and ensuring that the concerns of the public are effectively and efficiently managed and resolved.