

Direct Complaints Survey:

A survey seeking feedback from people who complain directly to the IPCC

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IPCC Research Note 3**

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Acknowledgements

Our thanks go to colleagues in the IPCC's Telephone Complaints Centre, the Corporate Communications Team and Standards and Quality Directorate. We would also like to thank those members of the public who gave up their time to take part in this survey.

Key findings

Significant proportions of respondents reported trying to make a complaint to the police before contacting the IPCC. They told us about encountering a range of barriers to making a complaint direct to the force.

Lodging a complaint with the IPCC is often motivated by a desire to complain to an independent organisation; by a perception that the police will not deal with complaints fairly; and by a fear of police harassment/other police action.

Reasons for not providing consent¹ included a perception that the police would not deal with complaints fairly and a fear of police harassment/other police action. There are also marked variations in consent rates between police forces.

This survey found low ratings of fairness and satisfaction with the IPCC and very low ratings of fairness and satisfaction with the police.

Background

Under provisions under the Police Reform Act (PRA) 2002, the IPCC has a statutory duty to increase public confidence in the police complaints system in England and Wales. As part of its guardianship responsibilities, the Commission is required to:

1. set and monitor statutory complaint handling standards for the complaints system as a whole,
2. draw out and feed back local and national operational lessons from conduct complaints,
3. ensure the accessibility of the complaints system, and
4. promote public confidence in the complaints system.

In the past, the IPCC has conducted research that has provided an insight into the level of awareness of the IPCC and confidence of the general

¹ Consent in this context refers to if a complainant has provided written or verbal consent for the IPCC to forward their complaint to be forwarded to the appropriate authority for consideration.

population (IPCC 2010a). We have also surveyed those who use our appeals service (IPCC 2009a) and complainants linked to managed and independent investigations (IPCC 2009b). But little is known about the experiences of those who complain directly to the IPCC. A 'direct complaint' refers to when a member of the public submits their complaint to the IPCC rather than locally with their police force. Although the IPCC does not have the power to record complaints, it acts as a gateway to the complaints system by accepting complaints and passing them to the relevant 'appropriate authority'² for consideration.

Since its inception in 2004, the IPCC has seen a three-and-a-half fold increase in the number of direct complaints it has received. Table one below illustrates the number of direct complaints received each financial year with the corresponding percentage change. In the financial year 2009/10, a total of 31,259 complaints were recorded (Gleeson and Grace 2009: v). When compared to the number of direct complaints forwarded to appropriate authorities in the same year, it is clear that nearly half of recorded complaints were made initially to the IPCC.

Table 1: Direct complaint caseloads by financial year

Financial year	04/05	05/06	06/07	07/08	08/09	09/10
Direct complaints received	4,321	7,443	10,297	11,449	14,870	15,090
% change	-	72%	38%	11%	30%	1.5%

Source: IPCC Annual Report (2010b)

In order for the IPCC to forward direct complaints to the appropriate authority, verbal or written consent is required from the complainant. In the last financial year, only 11,160 complainants provided their consent, meaning that 26% of direct complaints were not sent to the appropriate authority for consideration. From a guardianship perspective, it is important for the IPCC to understand

² In the majority of cases this is the Professional Standards Department of the police force subject to the complaint. Complaints made against ACPO rank officers are forwarded to police authorities for consideration.

both why complainants choose to use our direct complaints service and why some complainants do not then consent to their complaint being forwarded to the relevant force for recording.

Research aims and objectives

The three broad aims of this research project were to:

1. Seek feedback on the IPCC's handling of direct complaints to help inform future practice in this area
2. Establish a better understanding of why just over a quarter (26%) of complainants do not give their consent to have their complaint forwarded to the police
3. Understand what happens to complaints once they are forwarded to the police

The study has obtained data about people's experiences of:

- complaining to the police,³
- motivations for complaining to the IPCC,
- how direct complaints were submitted,
- IPCC information provision and communications.

In addition, we have obtained information about the overall sense of fairness and satisfaction with the police and the IPCC.

Methodology

It was decided that a survey would be the best way to develop an understanding of the experiences of direct complainants. This was because surveys have the potential to reach large numbers of people and the quantitative data gained from this method can be interpreted easily. In addition, it was decided to carry out semi-structured telephone interviews with a smaller group of respondents in order to gain a richer understanding of their views and experiences.

³ Throughout this report, 'police' refers to Home Office police forces. The City of London Police are included in the analysis, although it is recognised that this is an atypical force.

Piloting

Before the main phase of the survey was implemented, we carried out a smaller pilot phase with a sub-sample of approximately 600 direct complainants to ensure that people understood the questionnaires. In addition, we conducted 12 cognitive interviews with people who took part in the pilot in order to obtain detailed feedback on the questionnaire. The pilot was undertaken during May and June 2010, and confirmed that respondents were able to consistently understand the questions being posed to them. As a result, we decided to combine the responses from both the pilot and main phases of the survey.

Sampling

The consenting sample was made up of people who made a direct complaint to the IPCC between March and May 2010. The non-consenting sample was made up of people who made a direct complaint between November 2009 and May 2010. The necessary data was extracted from the IPCC's Case Tracking Management System (CTMS).

A wider variation in dates from which the non-consenting sample was drawn was needed for several reasons. More complainants provide their consent for their complaint to be forwarded than people who do not, and 20% of address data for non-consenting complainants was unavailable.

For various practical, ethical and security reasons, further cases were excluded from the survey. This included 37 complaint cases relating to non-Home Office police forces, 56 complainants who were in prison at the time of their complaint,⁴ 31 overseas complainants; 35 cases following advice from the IPCC's Telephone Complaints Centre and Standards and Quality Directorate;⁵ and finally 18 cases where a solicitor was listed as the single point of contact for the complainant. In total, 2,318 questionnaires were sent to consenting respondents and 1,020 to non-consenting complainants.

⁴ The primary reason for not contacting prisoners was that it was impossible to guarantee that the confidential covering letter and questionnaire would be opened only by the addressee. In addition, due to the transient nature of the prison population, we could not guarantee that the prison address was the most recent address for the potential respondent.

⁵ These cases were removed for a number of reasons, including cases involving death or serious injury, cases involving particularly vulnerable complainants or cases involving members of the public who had made threats against IPCC staff.

Responses

We received 535 completed surveys from consenting respondents and 197 responses from non-consenting respondents. Therefore, we achieved response rates of 23% and 19% respectively. In addition to receiving the standard responses in the questionnaires, significant volumes of valuable textual data was obtained through respondents writing comments on the questionnaires and sending in letters.

Telephone interviews

To supplement the data obtained through the questionnaires, we conducted 26 in-depth telephone interviews with a selection of consenting and non-consenting respondents in order to gain a richer appreciation of their experiences of the police complaints system. In identifying potential interviewees, we felt it was particularly important to actively include more interviewees from Black or minority ethnic (BME) groups than were represented in the questionnaire responses.⁶ This was because it is recognised that BME groups have different experiences of policing and have lower levels of trust in the police (IPCC 2010a).

Approximately five hours of interview data was gathered and the results were professionally transcribed. The data was then compared and contrasted using a qualitative coding framework. The findings of the telephone interviews are outlined below in conjunction with the questionnaire findings. To distinguish between the questionnaire and in-depth interviews; people who took part in the questionnaire are referred to as 'respondents' while people who took part in the telephone interviews are referred to as 'interviewees'.

It is important to note that the questionnaire and interview results presented in this report rely on the accounts of those participating in the research. The purpose of this research is to reflect the viewpoints of complainants, rather than to establish if their feedback is true or false.

⁶ Nearly half of the interviewees stated that they belonged to an ethnic group other than 'White British', 'White Irish' or 'Any other White background'. The genders and age ranges of interviewees were also varied.

Statistical note

Throughout this report percentages have been rounded. Therefore the total percentages reported may not add up to 100%. Further, the pilot phase of the survey revealed that many respondents wanted to select more than one option on several questions. Therefore, in some results, the percentages and charts adopted are in relation to the total number of *responses* received, rather than the total number of respondents. In addition, given the variety of ways to source information and make a complaint, a 'not applicable' option was available for some questions. To avoid distorting findings, this data is excluded from some analyses. Important background statistical information is highlighted throughout this report.

Findings

Characteristics of respondents

Seventy-seven per cent of respondents stated that they were from a white background, 3% from a mixed background, 7% from a Black background, 5% from an Asian background, and 3% from a Chinese or other background. The remaining 8% of respondents declined to specify their ethnic background. Sixty-three per cent of respondents identified themselves as male and 37% as female. One respondent identified themselves as transgender and 11 respondents declined to provide details for this area. In terms of age, 7% were in the 15-29 age group, 15% were 30-39, 21% were 40-49, 15% were 50-59, 15% were aged 60 years and over and 27% declined to comment.

Data limitations

It is important to note that we are unable to determine if the demographic composition of the sample reflects the wider direct complainant population. This is because the availability of demographic details of direct complainants through CTMS is particularly weak and a large proportion of respondents in the survey did not specify their age.

Making a complaint with the police

A very high proportion of respondents reported trying to make a complaint to the police before contacting the IPCC. This figure was 61% for both consenting and non-consenting respondents. The high proportion of respondents who tried to make a complaint to the police before contacting the IPCC suggests that many people who complain via the IPCC would rather their complaints were dealt with at force level. Where applicable,⁷ respondents were asked why they were unsuccessful in complaining to the police before contacting the IPCC. The top three responses for consenting and non-consenting respondents were:

- that it was difficult to find the right person to talk to (50% and 36% respectively),
- they were told they could not complain or that their complaint was not valid (26% and 25%), and
- that the force did not provide enough information (22% and 26%).

Respondents provided a large amount of additional textual data on the questionnaires. Where respondents provided their own reasons for having been unsuccessful when complaining to the force, a range of explanations were offered. In both groups, people stated that they thought that they were not taken seriously or that they were being discouraged from making a complaint. People also reported a lack of response to letters and phone calls. For non-consenting responses, issues also included limited disabled access at police stations and allegations of discrimination based on their mental health. The feedback outlined below is illustrative of the kinds of problems respondents experienced:

“I was passed from department to department, I had promises from officers who said they would contact me but I heard nothing.”
(Consenting respondent)

⁷ This question was a multiple response question; respondents could pick up to six options. Therefore, the percentages quoted are proportions of the total *responses* received, rather than a proportion of the number of respondents.

“I simply did not get a reply despite several verbal and written reminders.”

(Consenting respondent)

Several interviewees stated that they made face-to-face enquiries about making a complaint at a local police station or during police contact. Many felt that their concerns were not taken seriously and reported finding it particularly difficult to progress their complaint in this way. This included interviewees who felt that officers were trying to dissuade them from making a complaint, making subtle hints that complaints should not go any further, or officers who were being deliberately obstructive by withholding information about how to make a complaint. These findings reflect research conducted by Maguire and Corbett (1991) on behalf of the Home Office. Respondents and interviewees in their sample reported the same kinds of barriers to making a complaint at force level. Many reported that they only thought they were successful in lodging their complaint through their own perseverance. A small number of interviewees made more serious allegations. These ranged from the offer of a caution instead of a charge, if a complaint was withdrawn, through to threats and allegations of violence. This feedback was not typical of the questionnaire or telephone interview responses, but has been highlighted because these allegations of barriers to making a complaint are particularly serious. Overall, the above examples suggested a ‘dark figure’ of members of the public whose grievances were unrecorded.

Importantly, a number of interviewees reported being advised by police officers or staff in police stations to contact the IPCC about their complaint. This, together with a large number of similar responses received with the questionnaires in the survey, suggests that many people are being directed to the IPCC rather than being informed that the force can deal with the complaint. This approach can cause significant delays in recording complaints and receiving a response in relation to someone’s complaint.⁸ It also causes confusion for complainants when they are told by the police to contact the IPCC, but then have their complaints forwarded back to the professional

⁸ As noted at the beginning of this report, the IPCC has dealt with an exponential rise in complaints made directly to it by members of the public. During busier periods it has taken the IPCC eight to ten weeks to forward complaints to the relevant appropriate authority for consideration.

standards department for consideration. Reflecting on this, one interviewee felt that the IPCC's service did not add any value to their complaint:

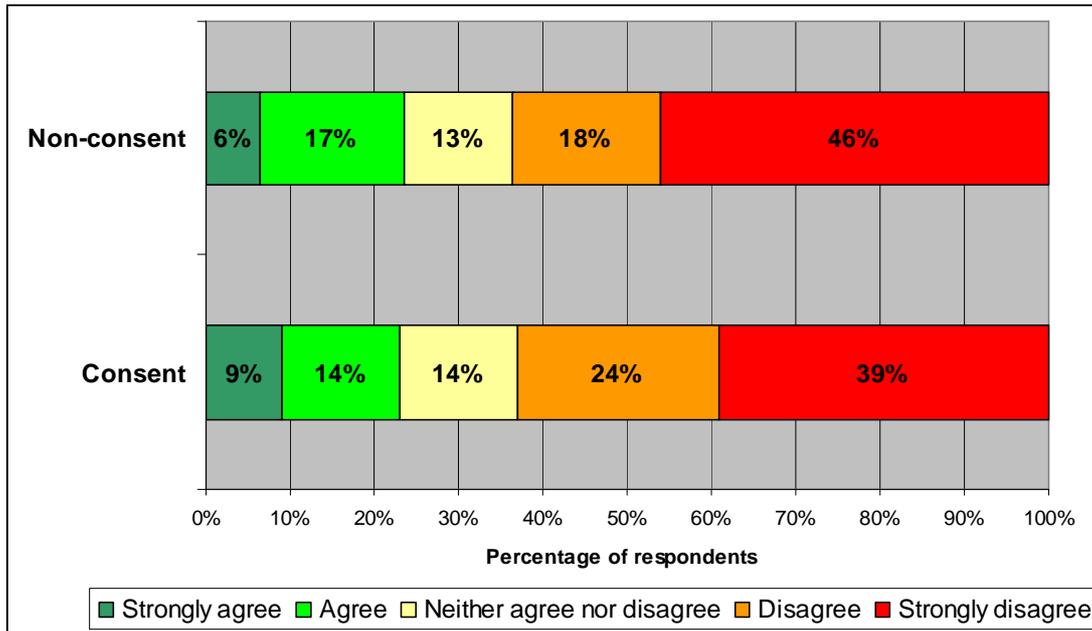
“So basically, it’s pointless going through the IPCC if that option is really going directly to the [police force name] police complaints department.”
(Consenting interviewee)

Conversely, several questionnaire respondents provided additional feedback commenting that the police had taken appropriate action only after the IPCC had forwarded their complaints. This was also the case for several interviewees, who considered the IPCC to have had a demonstrable impact on the progression of their complaint:

“I received the phone call from [police force name] police... after you’d [the IPCC] contacted them. It was quite interesting, they all knew my name, they all knew who I was and they were jumping through hoops to co-operate. That bit was quite interesting.”
(Consenting interviewee)

Respondents in both consenting and non-consenting groups gave particularly negative feedback in relation to the information provided by the police on how to make a complaint. Figure two below illustrates the views of respondents when following statement was posed to them: ‘the force provided me with all of the information I needed to make a complaint’.

Figure two: responses from the statement “the police provided me with all of the information I needed to make a complaint”



Consistent with the questionnaire findings, all of the interviewees who spoke about the police handling of their complaints and the adequacy of information provided by the police gave particularly negative feedback. Several interviewees reported that they received no communication at all in relation to their complaint prior to IPCC involvement. Interviewees who did receive some form of communication from the police highlighted infrequent communication and a lack of detail or explanations in letters. This led many interviewees to feel suspicious that their complaints had not been addressed and that the police were colluding with one another in relation to complaints.

Further, consenting respondents were asked how the police force said they handled their complaint. Forty-two per cent stated that the police said they conducted an investigation, 25% stated that the police refused to record the matter or look into it, and 23% stated that the police said they had resolved the issue locally. From the data presented above, it is clear that a sizeable number of respondents experienced difficulty in having their complaint progressed at force level.

Making a complaint via the IPCC

Reasons for contacting the IPCC

When asked why they had contacted the IPCC about their complaint, responses were similar to those received in relation to complaining to the police. Within the whole sample, the top three⁹ responses for both consenting and non-consenting respondents were that they did not believe that the police would deal with their complaint fairly (58% and 68% respectively), they wanted to complain to an independent organisation (46% and 45%), and that they feared police harassment/other police action (25% and 30%). When looking only at respondents who tried to make a complaint to the police before contacting the IPCC, there was no significant proportional difference in responses.

Respondents in both groups provided large volumes of 'other' free-text responses and several additional reasons for contacting the IPCC about their complaint. This included the police ignoring letters, not keeping appointments, not returning phone calls, being directed to the IPCC by staff and officers at police stations, and that the IPCC's website was listed first on online search engines. Importantly, several respondents were unhappy at the *outcome* of the police investigation into their complaint and so lodged a direct complaint with the IPCC. Therefore, it is apparent that the direct complaint service may sometimes be engaged when, in fact, the IPCC's appeals service is more appropriate.

Method of complaint submission

Approximately two-thirds of non-consenting respondents stated that they submitted their complaint by post, compared to 54% of consenting respondents. Twice as many consenting respondents stated that they submitted their complaint through the website than non-consenting respondents. These proportions were 41% and 21% respectively. Ten per cent of non-consenting respondents submitted their complaint over the

⁹ This question was a multiple response question; respondents could pick up to six options. Therefore, the percentages quoted are proportions of the total *responses* received, rather than a proportion of the number of respondents.

telephone, compared with 4% of consenting respondents. This suggests that people who use the IPCC's online services for lodging a complaint are more likely to be exposed to information about the need for complainants to provide their consent for the complaint to be passed to the force concerned for consideration and potential recording. By contrast, it is clear that people who send the IPCC complaints via letters or hard-copy complaint forms are less likely to be exposed to this information. Therefore, a long-term strategy for encouraging online complaint submissions rather than traditional paper-based submissions could help to improve consent rates in the future.

Providing consent

As noted above, the IPCC continues to act as a gateway to the complaints system by accepting complaints and passing them to the relevant appropriate authority. For this to occur, complainants must provide their verbal or written consent.

When asked why they did not give their consent for their complaint to be forwarded to the force, the top three responses from non-consenting respondents were:

- that they did not think the police would handle their complaint properly (32%),
- that they wanted their complaint to be handled by the IPCC (25%), and
- that they feared police harassment or other police action (17%).

Several respondents provided free-text responses to this question which related to police customer service issues. Respondents stated that they did not receive any communication from the police in relation to their complaint for some time. This suggests that these complainants may be able to lodge an appeal with the IPCC against the non-recording of their complaint.

Consent rates between police forces

In the financial year 2008/09, the overall consent rate for direct complainants was 69%. In the last financial year, the consent rate rose to 74%. It is

important to consider whether there are any variations between police forces that depart from the IPCC average. Table two below outlines the consent rate for all police forces in the financial year 2009/10.

Table two: variations in consent rates between all police forces in 2009/10

Force	Non-consent	Consent	Total	Consent rate
North Wales	21	145	166	87%
Warwickshire	18	103	121	85%
Gwent	21	114	135	84%
Wiltshire	28	151	179	84%
Bedfordshire	36	162	198	82%
South Yorkshire	52	233	285	82%
Lincolnshire	22	98	120	82%
Devon & Cornwall	73	323	396	82%
Durham	21	87	108	81%
Essex	94	389	483	81%
West Mercia	52	209	261	80%
Metropolitan	778	2944	3722	79%
Thames Valley	105	394	499	79%
Sussex	97	358	455	79%
Greater Manchester	140	490	630	78%
Humberside	41	143	184	78%
Merseyside	85	294	379	78%
Leicestershire	50	171	221	77%
West Yorkshire	126	424	550	77%
Norfolk	28	94	122	77%
Nottinghamshire	60	201	261	77%
Cambridgeshire	42	139	181	77%
Dorset	36	119	155	77%
Lancashire	95	312	407	77%
Northamptonshire	29	95	124	77%
West Midlands	156	486	642	76%
Suffolk	32	99	131	76%
Hampshire	101	311	412	75%
Surrey	64	196	260	75%
Cleveland	24	73	97	75%
Northumbria	77	234	311	75%
Cheshire	46	137	183	75%
Kent	114	339	453	75%
Gloucestershire	31	90	121	74%
Derbyshire	47	133	180	74%
Staffordshire	46	125	171	73%
South Wales	84	228	312	73%
Hertfordshire	60	162	222	73%
Dyfed-Powys	39	101	140	72%
Cumbria	26	64	90	71%
City of London	53	111	164	68%
North Yorkshire	75	132	207	64%
Avon & Somerset	203	255	458	56%
Total	3428	11468	14896	Average 77%

The average consent rate for all force direct complaints received by the IPCC in the financial year 2009/10 is 77%.¹⁰ The overall range in consent rates is 32%. No significant variations in consent rates are evident between IPCC regions or against statistical models such as the Most Similar Forces framework.¹¹ This suggests that variations in consent rates are likely to be due to experiences with the police and complaint handling at force level, rather than wider social or geographical factors.

Twenty two of the forces in the sample have consent rates which lie between the 75% and 80%, meaning that a large number of forces have consent rates that lie close to the overall IPCC average.¹² However, Avon & Somerset Constabulary's consent rate of 56% is significantly below the other forces in the population.¹³ North Yorkshire Police and City of London Police's consent rates of 64% and 68% remain low in comparison to the other forces in the population.

Providing or withholding consent was a theme that was addressed in detail during our telephone interviews. Several interviewees highlighted their concerns about the IPCC forwarding complaints to forces. A generally held view was that internal investigations by forces cannot be impartial, fair or balanced. For some, the prospect of forwarding the complaint to the force seemed intimidating and this is also reflected in the questionnaire feedback as the respondent's fear of police harassment/other police action. One interviewee stated that forwarding complaints to forces gives the police an unfair advantage, meaning that they can then prepare their statements knowing what complainants have said. Other interviewees had no concerns about the IPCC forwarding complaints to forces because they understood the need for correspondence and communication to be shared in order to address the complaint:

¹⁰ This is three per cent higher than the overall average, which includes direct complaints relating to HMRC, SOCA, UKBA, British Transport Police, Civil Nuclear Constabulary, Borough Parks Police and Port of Dover Police.

¹¹ Most Similar Forces refers to police force groupings devised by HMIC in 2001. Forces were grouped together where their respective areas had comparable geographic, demographic and socio-economic situations.

¹² This was calculated by obtaining the first and third quartiles of the data points, and subtracting the difference.

¹³ This statistically deviant observation was highlighted by plotting the data on a box plot. Box plots recognise extreme values (statistical 'outliers') and disregard them when calculating measures of central tendency. This allows extreme values to be counted, but does not allow them to distort the validity of the remaining observations. Statistical outliers are identified when observations fall outside three times the inter-quartile range: (Lower quartile – (1.5×IQR), Upper quartile + (1.5×IQR)).

“Unless you [the IPCC] approach them [the police], how do they know?”

(Consenting interviewee)

When asked why they did not give their consent, interviewees in the non-consenting group provided a range of reasons. Reflecting the questionnaire findings, a common reason for not providing consent was that they wanted the IPCC to investigate their complaint. It is apparent that many interviewees’ awareness of the IPCC was influenced by the IPCC’s high-profile presence in the news media. The independent investigation of serious complaints and incidents led some interviewees to believe that their complaint would also be investigated by the IPCC. For non-consenting interviewees, this perception was particularly strong:

“I just don’t think that any organisation should police itself, which is effectively what will be happening...No organisation, whether it be the police or anything else, should investigate itself when there’s been a complaint. They should be independent.”

(Non-consenting interviewee)

Other less common reasons for not providing consent were mixed. Some interviewees claimed to have links with the police service, such as retired police officers or staff. Others reported having friends who work within the police service. One interviewee had an ongoing civil dispute with the force and did not want their complaint to jeopardise their claim for compensation. Another interviewee had submitted the same complaint to the force and the IPCC, and did not provide consent because the force had taken action in relation to the complaint made to them. One interviewee was severely dyslexic and did not notice the consent section on the online complaint form.¹⁴

It is clear that in the majority of cases, the desire for independent oversight is rooted in limited understanding of the complaints system and inaccurate

¹⁴ The IPCC website has a number of features to assist people with dyslexia to access information, including browse aloud enabled text. However, online complaint forms do not have any additional features to assist dyslexic people in submitting their complaint. The dyslexic interviewee who highlighted this suggested that a large red exclamation mark would enable other dyslexics to identify that further action was needed on the online form.

expectations of what the complaints system can deliver. Therefore, managing the expectations of direct complainants should be a priority.

Force handling of direct complaints after the IPCC has forwarded them

As noted above, one aim of this project was to establish what happens to direct complaints after the IPCC has forwarded them to the appropriate authority for consideration. Therefore, a data collection exercise was conducted with five forces¹⁵ in the Wales and South West region. This was carried out to establish a reasonable estimate of how many direct complaints forwarded to forces were recorded as Quality of Service or Direction and Control complaints.¹⁶ Each force was provided with a random sample of 20 direct complaints, which were forwarded in the financial year 2009/10. They were asked to specify whether the complaint was recorded as a PRA 2002 complaint, as a Quality of Service or Direction and Control complaint, or not recorded at all. Where forces recorded the complaint as a PRA 2002 complaint, they were asked to state how it was then dealt with: either by means of local resolution or local investigation, or to specify if it had been withdrawn by the complainant or other.

Data for 98 cases was returned by forces. Eighty-one per cent were recorded as a PRA 2002 complaint, 15% were not recorded and 4% were designated as a Direction and Control or Quality of Service complaint. Of the 79 cases recorded as a PRA 2002 complaint, 35 were locally investigated (44%), 34 were resolved locally (43%), six were withdrawn (8%) and four were dispensed with (5%). These results suggest that a large proportion of direct complaints do, in fact, concern the conduct of individual officers serving with the police.

¹⁵ These forces were Avon & Somerset, Devon & Cornwall, Dyfed-Powys, Gloucestershire and South Wales.

¹⁶ Quality of Service or Direction and Control complaints do not concern conduct matters relating to individual officers. Rather, they concern the perceived adequacy of operational policing matters, such as the deployment of police officers in a certain area or the management decision of police forces.

Rate of direct complaints per 1,000 officers

A statistical analysis of the rates of direct complaints per 1,000 officers for all police forces was carried out. The table below outlines the five forces with the lowest rates of direct complaints per 1,000 officers.¹⁷ The following table outlines the five forces with the highest rates of direct complaints per 1,000 officers.

Table three: forces with the lowest rates of direct complaints per 1,000 officers, financial year 2009/10

Force	Total direct complaints	Police personnel	Rate of direct complaints per 1,000 officers
Cleveland	97	1,724	56.3
Durham	108	1,507	71.7
Cumbria	90	1,238	72.7
Norfolk	122	1,662	73.4
Northumbria	311	4,187	74.3

Table three above shows that Cleveland has the lowest rate of direct complaints at 56.3 direct complaints per 1,000 officers. The remaining four forces on the table have higher but comparable rates of direct complaints per 1,000 officers. These five forces have markedly low rates of direct complaints per 1,000 officers compared to the overall average of 106.

¹⁷ This includes all officers at a full-time equivalent. The data was sourced from the Home Office's most recent police service strength report.

Table four: forces with the highest rates of direct complaints per 1,000 officers, financial year 2009/10

Force	Total direct complaints	Police personnel	Rate of direct complaints per 1,000 officers
North Yorkshire	207	1,486	139.3
Sussex	455	2,313	141.6
Wiltshire	179	1,181	151.6
Bedfordshire	198	1,246	158.9
City of London	164	852	192.5

Table four above shows that City of London Police has the highest rate of direct complaints at 192.5 direct complaints per 1,000 officers. The City of London Police is an atypical force and cannot be rationally compared to other Home Office police forces. The City of London geographic area is characterised by low numbers of local residents and exceptionally high levels of transient visitors. Moreover, the force has only three police stations open to the public. These factors explain why this force has markedly higher rates of direct complaints per 1,000 officers. The remaining four forces in the table have more dispersed direct complaint rates, ranging from 139.3 direct complaints per 1,000 officers for North Yorkshire to 158.9 direct complaints per 1,000 officers for Bedfordshire. These five forces have rates of direct complaints per 1,000 officers that are markedly higher than the overall average of 106. A full table of the rate of direct complaints per 1,000 officers for all forces can be found in the appendix of this report. Two further tables are also provided in Annex A, which give further insight into which forces were the subject of complaints made to the IPCC. These present figures on:

- the percentage distribution of direct complaints for all police forces, and
- the rate of direct complaints per 100,000 of the estimated population over the age of ten.¹⁸

¹⁸ This data was produced by the Office for National Statistics in 2003 and analysed by the Ministry of Justice (2007) and includes an estimate of the population aged ten and over for police force areas, p. 208.

IPCC literature and communications ¹⁹

Finding information

A larger proportion of consenting respondents sourced information about making a complaint using the IPCC's website than non-consenting respondents (49% and 30% respectively). A larger proportion of non-consenting respondents were sent an information leaflet following a telephone conversation than consenting respondents (35% and 22% respectively). Similar proportions of consenting and non-consenting respondents sourced information from a police station (16% and 17% respectively), from a solicitor or independent advice organisation (9% and 12% respectively) and from a police force website (4% and 6%).

Adequacy of information

IPCC literature and communications were generally highly regarded by respondents, although ratings were consistently lower for non-consenting respondents rather than consenting respondents. Eighty-one percent of consenting respondents and 50% of non-consenting respondents 'strongly agreed' or 'agreed' that the IPCC's website instructions for making a complaints were easy to understand. These ratings were reflected in the telephone interviews; interviewees expressed the belief that the IPCC's website was user friendly and that using it saved time. However, two interviews stated that they would have liked to see up-to-date timescales on how long it takes for the IPCC to forward complaints to forces. Other interviewees suggested that it would be useful for the IPCC to provide clear examples of what the IPCC would and would not investigate in the area of the website where people can make online complaints.

Eighty-one per cent of consenting respondents and 60% of non-consenting respondents 'strongly agreed' or 'agreed' that the IPCC complaint form (paper or online) was easy to fill out. Eighty-two per cent of consenting respondents

¹⁹ Because there are a number of potential avenues to access information and make a complaint, a 'not applicable' option was available for some questions. Where 'not applicable' was selected by respondents, this data has been excluded from the percentages outlined below.

and 66% of non-consenting respondents 'strongly agreed' or 'agreed' that the letter they received from the IPCC was easy to understand.

Desired outcomes, and people's sense of fairness and satisfaction with the police and the IPCC

Outcomes

When asked what kind of outcome they were seeking when they complained to the IPCC, the top three responses for both consenting and non-consenting respondents were:

- to ensure that similar incidents do not happen again (70% and 64% respectively),
- for the IPCC to investigate the complaint (60% and 64%), and
- an apology (55% and 51%).

Based on the very high proportions of respondents who wanted their complaints to be investigated by the IPCC, it is apparent that managing complainants' expectations should be a priority. The IPCC has limited resources and can therefore investigate only the most serious incidents. This might include deaths or serious injuries following police contact, or complaints of serious police misconduct or corruption which have the potential to impact on community confidence or trust.

Sense of fairness and satisfaction with the police

Respondents in both consenting and non-consenting groups reported very low ratings in connection with their sense of fairness and satisfaction with the police. Seventy per cent of consenting respondents and 71% of non-consenting respondents 'disagreed' or 'strongly disagreed' that they were treated fairly by the police. Seventy-one per cent of consenting respondents and 72% of non-consenting respondents 'disagreed' or 'strongly disagreed' that they were satisfied with the way that the police handled their complaint. When interviewees were pressed to elaborate on why they felt they had not been treated fairly and why they were unsatisfied with the handling of their

complaint, it is clear that their perceptions are in the result of poor customer service and communication.

Sense of fairness and satisfaction with the IPCC

Respondents in both groups rated their sense of fairness and satisfaction concerning the IPCC slightly higher, although this was consistently lower for non-consenting respondents. Forty-two per cent of consenting respondents and 24% of non-consenting respondents 'strongly agreed' or 'agreed' that their complaint was treated fairly by the IPCC. Thirty-seven per cent of consenting respondents and 20% of non-consenting respondents 'strongly agreed' or 'agreed' that they were satisfied with the way that the IPCC handled their complaint.

When interviewees were pressed to elaborate on their sense of fairness and satisfaction with the IPCC, responses were mixed. Positive remarks were made about our polite and helpful staff who were clear and informative, the ease of making a complaint, and the forwarding of complaints having an impact on the progression of their complaint at force level. Negative feedback included the limited amount of contact with the IPCC; interviewees reported '*clipped*', '*too impersonal*' and '*automatic*' communication in relation to their direct complaints. Again, it is clear that people's sense of being treated unfairly and dissatisfaction with the IPCC are rooted in limited understandings of the complaints system and inaccurate expectations of what the complaints system can deliver. Managing the expectations of complainants should be a priority, both at force and IPCC levels.

Discussion

Based on the feedback provided by respondents and interviewees outlined above, we are able to identify a number of areas of learning for the police and the IPCC. It is clear that in the majority of cases, current force practice is promoting particularly negative outcomes for complainants. This research identified poor handling of complaints at force level, and there is a clear need for forces to accept more complaints raised with them by members of the public.

The very high numbers of respondents who tried to complain to the police before contacting the IPCC is indicative of a desire for complaints to be handled at force level. Despite this, it is clear that many of those who complain via the IPCC have a limited understanding of local complaint handling and do not distinguish between professional standards departments and the officer(s) subject to the complaint. Some respondents explicitly did not want any IPCC involvement, but contacted the IPCC following a lack of progress with the police. Therefore, the ability to raise a complaint via the IPCC remains an important service for people who experience difficulties at force level.

The IPCC must continue to monitor direct complaints, including the proportions of complainants who provide and withhold their consent, to ensure that the complaints system is accessible. Any significant changes to IPCC casework practices in relation to direct complaints should be balanced with the need to ensure that appropriate safeguards are in place. This is particularly important given the large proportion of respondents who reported that communication from the police in connection with a complaint was unsatisfactory. Working with forces is the most promising way of reducing demand for our direct complaints service. Moreover, fostering a greater awareness of local complaint handling through guardianship work with forces and improvements to IPCC corporate communications could improve consent rates.

In addition, it is apparent that some complainants are approaching the IPCC as direct complainants when, in fact, our appeals service is more appropriate to their situation. Therefore, we need to do further work both with forces and complainants to emphasise the independent nature of our work in relation to appeals.

Recommendations for the IPCC

Recommendation one

The IPCC should work with Professional Standards Departments to promote effective complaint handling at the local level. The IPCC should focus on forces with low consent rates, high rates of direct complaints per 1,000 officers and per 100,000 of the population, and those with the largest proportions of overall direct complaints.

Recommendation two

Those who oversee the IPCC's casework function should ensure that it continues to keep an electronic record of complainants' willingness to provide consent for complaints to be forwarded to the Appropriate Authority for consideration. This will enable us to monitor consent rates for different police forces in the longer term and will provide the IPCC with the necessary intelligence to carry out its guardianship responsibilities.

Recommendation three

Some people approaching the IPCC as direct complainants have either had their complaint recorded by the police and were not happy about how it was dealt with, or have been told by the police that their complaint would not be recorded. These people could use our appeal service. Those who oversee the IPCC's casework functions should consider ways of improving the detection of eligible appellants through routine customer interactions.

Recommendation four

IPCC literature, communications and complaint forms should place a greater emphasis on the role of Professional Standards Departments. Consent rates may be improved by highlighting the fact that PSDs are distinct departments separate from the officer(s) or staff member being complained about.

Recommendation five

The IPCC's independent capacity in relation to appeals needs to be publicised in IPCC literature about making a complaint, and in communications such as letter templates and complaint forms. This may help to manage expectations upon the initial submission of a direct complaint and improve consent rates.

Recommendation six

The IPCC should continue to encourage online complaint submissions over alternative forms as this is likely to have a positive impact on rates of consent in the future.

Recommendations for Professional Standards Departments**Recommendation seven**

PSDs need to promote access to the complaints system at the local level. PSDs should review their corporate communications, such as websites, leaflets and posters, to ensure that members of the public are encouraged to complain locally.

Recommendation eight

PSDs should ensure that they receive and record complaints effectively when made at a local level with their force. This could involve providing training and guidance to public facing officers and staff who are responsible for handling complaints.

Recommendation nine

PSDs should ensure that they publish an indication of the level of service that members of the public should expect in relation to the handling of their complaints. This should include information about timescales, the method of communication that will be used while the complaint is looked into, and what kinds of outcomes can be realistically achieved.

Recommendation ten

PSDs should ensure that members of the public are made aware of their right of appeal to the IPCC if a decision is made not to record a complaint.

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Standards and Quality Directorate
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Annex A

Table five: rates of direct complaints per 1,000 officers across all police forces.

Force	Total	Police Personnel	Rate of direct complaints
City of London	164	852	192.5
Bedfordshire	198	1,246	158.9
Wiltshire	179	1,181	151.6
Sussex	455	3,213	141.6
North Yorkshire	207	1,486	139.3
Avon & Somerset	458	3,302	138.7
Surrey	260	1,890	137.6
Essex	483	3,606	133.9
Warwickshire	121	973	124.4
Cambridgeshire	181	1,471	123.0
Kent	453	3,787	119.6
Dyfed-Powys	140	1,195	117.2
Thames Valley	499	4,434	112.5
Metropolitan	3,722	33,367	111.5
Lancashire	407	3,649	111.5
Devon & Cornwall	396	3,556	111.4
Hampshire	412	3,748	109.9
West Mercia	261	2,391	109.2
Nottinghamshire	261	2,409	108.3
Suffolk	131	1,246	105.1
North Wales	166	1,590	104.4
Dorset	155	1,486	104.3
Hertfordshire	222	2,130	104.2
Lincolnshire	120	1,206	99.5
South Wales	312	3,148	99.1
South Yorkshire	285	2,953	96.5
West Yorkshire	550	5,758	95.5
Leicestershire	221	2,317	95.4
Gwent	135	1,437	93.9
Gloucestershire	121	1,309	92.4
Northamptonshire	124	1,343	92.3
Humberside	184	2,058	89.4
Derbyshire	180	2,074	86.8
Cheshire	183	2,155	84.9
Merseyside	379	4,516	83.9
Staffordshire	171	2,161	79.1
Greater Manchester	630	8,148	77.3
West Midlands	642	8,626	74.4
Northumbria	311	4,187	74.3
Norfolk	122	1,662	73.4
Cumbria	90	1,238	72.7
Durham	108	1,507	71.7
Cleveland	97	1,724	56.3
Total	14,896	143,735	Average 106.0

Table six: the percentage distribution of direct complaints for all police forces

Force	Total direct complaints	Percentage share
Metropolitan	3,722	25%
West Midlands	642	4%
Greater Manchester	630	4%
West Yorkshire	550	4%
Thames Valley	499	3%
Essex	483	3%
Avon & Somerset	458	3%
Sussex	455	3%
Kent	453	3%
Hampshire	412	3%
Lancashire	407	3%
Devon & Cornwall	396	3%
Merseyside	379	3%
South Wales	312	2%
Northumbria	311	2%
South Yorkshire	285	2%
Nottinghamshire	261	2%
West Mercia	261	2%
Surrey	260	2%
Hertfordshire	222	2%
Leicestershire	221	2%
North Yorkshire	207	1%
Bedfordshire	198	1%
Humberside	184	1%
Cheshire	183	1%
Cambridgeshire	181	1%
Derbyshire	180	1%
Wiltshire	179	1%
Staffordshire	171	1%
North Wales	166	1%
City of London	164	1%
Dorset	155	1%
Dyfed-Powys	140	1%
Gwent	135	1%
Suffolk	131	1%
Northamptonshire	124	1%
Norfolk	122	1%
Gloucestershire	121	1%
Warwickshire	121	1%
Lincolnshire	120	1%
Durham	108	1%
Cleveland	97	1%
Cumbria	90	1%
Total	14,896	

Table seven: rate of direct complaints per 100,000 of the estimated population over the age of ten.

Force	Total	Population aged 10 and over	Rate per 100,000 population
Metropolitan	3,722	6,592,496	56.5
Bedfordshire	198	519,356	38.1
Sussex	455	1,372,704	33.1
Avon & Somerset	458	1,407,915	32.5
Essex	483	1,491,284	32.4
Lancashire	407	1,285,249	31.7
Wiltshire	179	565,270	31.7
Merseyside	379	1,201,893	31.5
Kent	453	145,3427	31.2
Dyfed-Powys	140	454,857	30.8
North Yorkshire	207	709,078	29.2
West Yorkshire	550	1,917,487	28.7
South Wales	312	1,094,890	28.5
West Midlands	642	2,269,220	28.3
Greater Manchester	630	2,252,595	28.0
Nottinghamshire	261	947,019	27.6
North Wales	166	604,522	27.5
Gwent	135	495,497	27.2
Cambridgeshire	181	672,124	26.9
Surrey	260	968,188	26.9
Devon & Cornwall	396	1,499,539	26.4
Thames Valley	499	1,911,724	26.1
Warwickshire	121	467,828	25.9
Leicestershire	221	858,925	25.7
Hampshire	412	1,641,737	25.1
Northumbria	311	1,252,946	24.8
South Yorkshire	285	1,153,563	24.7
West Mercia	261	105,666,9	24.7
Dorset	155	638,817	24.3
Hertfordshire	222	934,643	23.8
Gloucestershire	121	518,216	23.3
Humberside	184	808,992	22.7
Northamptonshire	124	595,521	20.8
Suffolk	131	629,937	20.8
Cheshire	183	890,026	20.6
Derbyshire	180	885,866	20.3
Cumbria	90	446,909	20.1
Durham	108	540,097	20.0
Cleveland	97	494,335	19.6
Lincolnshire	120	621,757	19.3
Staffordshire	171	947,700	18.0
Norfolk	122	755,783	16.1
Total	14896	47,826,601	