

Norfolk Police and Crime Panel



Date: **7 March 2024**

Time: **11.00am**

Venue: **Council Chamber, County Hall, Norwich**

SUPPLEMENTARY AGENDA

2. Minutes of the meeting held on 6 February

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9. Complaints Policy Sub Panel – Update

To consider an update from the Chair of the Sub Panel

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Date Published: 5 March 2024

**For further details and general enquiries about this Supplementary Agenda
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COSTESSY STATEMENT

The Panel is obviously aware of the terrible incident that took place in Allan Bedford Crescent, Costessey on Friday 19 January.

My heart, and I'm sure all our hearts, goes out to everyone who has been affected by this tragedy and particularly to the four people who lost their lives

- Bartlomiej – or Bart – Kuczynski.
- Kanticha Sukpengoanao.
- Jasmine Kuczynski.
- Natasha Kuczynski.

I hope I have pronounced their names correctly.

What took place has been widely reported in the media with the Constabulary being as open and transparent as they can be in issuing statements and answering questions.

It is a matter that lies in the Constabulary's operational arena so I will not summarise events or speculate on matters arising.

I said in my statement at the time that I would be holding the Chief Constable to account for the actions of his officers and staff.

That is a statutory function of my role.

I can assure the Panel that the Chief Constable and his team have responded positively to my scrutiny.

However, the matter has been referred to the Independent Office of Police Conduct. There will also be a Coroner's Court.

Therefore it would be inappropriate, and possibly prejudicial, to say more at this stage.

POLICE PRECEPT - FY 24-25

Thank you

I'll take a little time over this.

I think it's right that I should explain in some detail to both the Panel and the public eye beyond these four walls, what I propose to do and why.

In doing so, I'll present the financial case and then, if I may, I'll ask the Chief Constable to give his perspective of the operational implications.

* * *

My key message up front is that I'm recommending a 4.28% increase of the police precept for financial year 2024-25.

This translates to an increase for a band D property of £12.96, or 25p per week, increasing the total bill for the year to £315.90.

The Panel will be aware that the precept is measured at band D but, should you require them, the figures for each band are given in the papers at page 101.

* * *

So, how have I arrived at this recommendation.

Three factors have been particular influences in my recommendation.

First, the Government's announcements about policing budgets.

Second, Norfolk Constabulary's funding need.

And third, the views of the public, as expressed through the consultation exercise conducted in the autumn of last year.

I have also considered a fourth factor: a look forward to where police funding might be going in financial year 2025-26 and beyond.

* * *

The Government announced the provisional police budget settlement for financial year 2024-25 on the 14th December 2023. The final settlements was laid before the house on 31st January and there were no changes from the provisional.

Norfolk's core policing budget is expected to increase by £14m to £221.7m, a 6.7% increase.

That announcement was in line with the indicative figures

Given in the 2021 comprehensive spending review settlement and additions as detailed in the report, and is made up of two parts:

- An increase in Government funding, the Home Office grant, of £9.3m.
- And the second part is an assumption that I will increase the precept by up to £13 at band D to generate the other £4.7m.

You will immediately recognise that a third of the additional money announced by the Government is predicated on me going for a £13 increase.

And, as I will explain, the Government has not left me much room for manoeuvre.

* * *

That brings me to the state of Norfolk Constabulary's funding.

The Government's austerity programme, which ran from 2010 until 2019, resulted in Norfolk's annual policing budget being cut by £42m or 20%.

In addition, over that period, the budget had to absorb a further £178m in aggregated inflation and other cost pressures.

The impact of these financial hits on police effectiveness could be measured in terms including reduced officer numbers, the reduction and then axing of police community support officers and the closure of a number of police stations.

The net effect was reduced police visibility.

There was a concern that policing in Norfolk was heading towards becoming a response only service.

Notwithstanding austerity, that situation was checked in 2017 by the Constabulary's 'Norfolk 2020' initiative. Norfolk 2020 was a deliberate, Norfolk Constabulary designed, shift back towards visible community policing. This laid the foundations for the current policing service, which the Chief Constable and I are trying to take forward under my Police and Crime Plan and the Chief's Force Management Strategy, because we both understand that community policing is the bedrock of the business.

The end of austerity was announced by the then Chancellor, Sajid Javid, in September 2019. He stated that "no department will be cut next year. Every single department has had its budget for day to day spending increased at least in line with inflation...that's what I meant by the end of austerity"

However, in October 2021, Rishi Sunak as Chancellor announced the three year settlement of his comprehensive spending review. That settlement was based on the assumption that inflation was a touch high at 3.1%, might just get to 4%, but would quickly fall back below the Bank of England's target of 2%.

Instead, we are all aware, inflation has been a much bigger issue than was expected.

Inflation hit 11.1% at its peak in October 2022, only falling below 5% in November 2023 and today stands at 4%. Inflation is not expected to fall below 2% until toward the end of financial year 2024-25.

Meanwhile, the Comprehensive Spending Review Settlement, we're in year two going into year 3 of that settlement. The CSR settlement announced in October 2021 has not been adjusted to mitigate the effect of inflation.

Citing Sajid Javid's view of what the end of austerity should look like, I would suggest that policing is in effect in year 2 – going into year 3 – of a new period of inflation driven austerity.

The result is that the inflationary pressure that has had to be absorbed since 2010 now aggregates to £257m.

* * *

There are then other unfunded cost pressures, three quick examples:

The first is pay:

Police pay is set nationally but is, in part, funded locally.

The assumption in the CSR settlement was that, across the three years of the settlement, Commissioners would find 3%, 2% and 2% of whatever pay award was made with the Government making up the balance. Instead, Commissioners have been required to find 4%, 3.5% and we expect to have to find at least 2.5% this year.

In Norfolk's case, each additional one percent I have to find represents a cost pressure of around £1.5m.

The unfunded cost pressure in the coming financial year arising from the full year impact of last year's 7% pay award is £10.8m.

The unfunded cost pressure in the coming financial year arising from the part year impact of this year's pay award – which we assume would be at least 2.5%, would be another £2.6m. Pay awards come into effect in September hence the description as a part year impact.

Meanwhile, non-pay inflation is then £1.6m, making a total of £15m, including the pay pressure I have just described.

A second cost pressure is the increased cost of regulation.

One example, the forensic regulator has increased the technical requirements for Norfolk's Sexual Assault Referral Centre. This has created an unfunded cost pressure of £750k if Norfolk is to maintain the SARC capability. It would be difficult to look the public in the eye and say we're taking the whole subject of violence against women and girls, the worst form of which is rape and sexual assault, and then close the SARC.

We have to find the money.

The third example is the constant dripping tap of unfunded tasks and training requirements:

- Every time new legislation or Government policy is introduced
- Every time the Inspectors, the College of Policing or the Independent Office of Police Conduct issues a report.
- Every time a Government commissioned review is published.

Additional tasks are laid on policing.

Many of these tasks, or the training associated with them, come with additional costs. These additional costs add up, are usually unfunded and so must be absorbed.

In short, the effect of austerity, the CSR settlement, inflation and the constant demands to absorb additional costs mean that Norfolk Constabulary is probably as lean an organisation as it could be.

I would argue, and I said this last year, that the Constabulary is under resourced. And, as you will hear, that under resourcing is now acute and is beginning to have an impact on the policing service the Constabulary is able to deliver.

The third key influence was the voice of Norfolk's public, particularly as expressed during the consultation exercise last Autumn.

The consultation ran over twelve weeks from the 4th of September to the 24th November.

The outcomes of the consultation are included in your papers beginning at page 102.

There were 665 responses to the online survey, although 34 could not be used reducing the total analysed to 631.

I accept that's a small sample, but the responses also reflect feedback I got from audiences I spoke to across the County.

The response to the online survey was convincingly in support of paying more to sustain the police

- 56% supported an increase of the precept
- and 44% opposed.

The fourth factor is a need to anticipate and position for financial pressures ahead.

I would suggest that we may face a period of financial uncertainty.
The current CSR settlement ends on the 31 March 2025.

Work on the next CSR should take place during this year with the settlement being announced in the Chancellor's autumn statement in October or November.

However, the expectation is that there will be a general election in the Autumn. Current polling suggests that there would be a new Government.

Therefore, we may have to await the outcome of the election, and then allow time after the election for a new Government to work up its policies before we know what the overall Government funding position look like, and before we know what the next CSR might look like.

In the meantime, the mid term financial plan, based on the assumptions given on page 54 of the papers is forecasting a budget shortfall increasing over time to £7.6m by 2027-28.

* * *

So, turning to the budget for 2024-25

If you distil my statutory responsibilities as Commissioner down to a single line, it's the line in the police reform and social responsibilities Act of 2011 that requires me to ensure that Norfolk Constabulary is effective and efficient.

Clearly, resources – money – enable effectiveness, while efficiency allows finite resources to be stretched – to maximise the effectiveness that can be gleaned from every penny.

The core policing budget for the current financial year 2023-24 is £207.7m.

Of this, 55%, comes from the Treasury via the Home Office Grant. The balance, 45%, comes from the households of Norfolk via the precept.

The cost of continuing to provide the current level of policing service through 2024-25 is forecast to be 3214.2m

The Home Secretary, through the Home Office grant and the Council Tax Legacy Grant of £9.3m will provide the £111.7m. The precept, including a £13 increase would provide £99.7m.

This would represent a percentage breakdown of 53% Government funding and 47% precept funding.

Meanwhile, to balance the budget I must ask the Chief Constable to find savings of £2.8M.

I am required by law to run a balanced budget, so I must balance the budget.

I have three levers available for me to do so:

First, ask the Chief Constable to make further efficiencies

Second, to use reserves to plug the gap.

- And third, to ask the households of Norfolk to pay more.

Let me expand further efficiencies.

I make the point again that the Constabulary is already lean.

The savings the Constabulary might offer would come with penalties to the policing service that could be provided. In the past the penalties have been largely transparent to the public. This time, it is likely that the penalties would be more obvious.

I have looked at the savings the Chief Constable is offering and the penalties involved. None of them are palatable. What is being offered is a package of the least worst option.

The question for me is how far I would need to ask the Chief Constable to reach down his list of unpalatable options and the impact on delivering an efficient and effective police service these savings would have.

I could use reserves.

- When I was elected in 2021 reserves stood at £20m or 11.4% of the net revenue budget. I felt that this level of reserves was too high.

- By the end of the current financial year reserves will stand at £17.7m or 8.4% of the NRB.

- My current strategy sees reserves reducing in 2024-25 to £15.8m or 7.6% of NRB. This level of reserves supports the capital programme, invest to save opportunities, insurance liabilities and unforeseen operational requirements. It also includes a reserve of last resort of £5.2m.

- However, I'm already reducing reserves and only holding what I calculate I need. My minimum reserve should be not less than £12.4m or 6% of NRB, and I would get into difficulties if my reserves should fall below 6%.

So, yes in theory, I could cover the £2.8m funding gap from reserves.

However, this would not offer a year on year solution. The use of reserves would only cover that part of the gap for one year and so would only defer the need to grasp the nettle to this time next year.

It follows that it would not be sensible to commit reserves to plug the remaining gap for just one year.

Therefore I must look at the third lever:

Asking the households of Norfolk to pay £10 more at band D would raise an additional £3m. This would leave £4.9m to find. I would suggest that the penalties of doing so would be unacceptable to the residents of Norfolk.

Asking the households of Norfolk to pay £13 more at band D would raise an additional £4.6m. This would still leave £2.8m for the Constabulary to find. Not easy – doable, just – but with penalties.

* * *

Bringing everything together: I'm placing before the Panel a recommendation of a precept increase of £12.96 – 4.28% - at band D, or 29p per week.

Chair, may I suggest that I bring in the Chief Constable at this point to describe the implications of finding the savings he must find if we are to balance the budget, and I'll then take questions after Paul has spoken.

Appendix C

My aim as your Chief Constable is to reduce crime, make our communities safer and improve standards throughout policing. Our County deserves an exceptional police service with a focus on providing the core services that are most important to the public we serve – answering calls promptly, investigating crime well and supporting victims. Crime is a tax on the entire economy: it deters investment and weakens economic growth, makes the workforce less productive and undermines broader confidence. Equally, it impacts the wellbeing and living standards of those we serve. The cost of not adequately funding policing is arguably greater than the cost of doing so.

In addition to my role as Norfolk's Chief Constable, I am the National Policing Lead for Finance. This role finds me in regular dialogue with Home Office Ministers and officials making the case for sustainable funding for policing. I hold this role at a challenging time.

Policing has a £3bn deficit. Borrowing levels are rising, reserves are dwindling, and forces are yet to deliver £1bn of planned efficiency savings. This is set against a total force level spend of c£15bn pa. Between 2010 and 2022, police funding increased by 20% compared to a 36% increase in inflation. In the same period, officer numbers have increased by 2.5% while recorded crime has increased by 25%. Rapid population growth has caused officer numbers per head of population to reduce in the last ten years and consequently, in many forces, service is suffering. That must not happen here.

Demand is outstripping supply and Chief Constables face making difficult service cuts to balance their budgets. This leads to the risk of short and intermediate term decision making, and stifles medium to long term investment in critical areas such as technology, sustainability and workforce development.

In December, I wrote to the Home Secretary setting out my concerns regarding police funding. I have also used my national role to highlight the limitations of our current funding directly to the Policing Minister on several occasions. I made these representations in my capacity as national lead for police finance, but all the concerns that I raised are live issues here in Norfolk.

We face significant and unavoidable cost pressures resulting from high inflation rates and police officer and staff pay awards. Our inspectorates and regulators are producing growing volumes of standards we are compelled to meet, leading to the threat of reduced productivity and increasing unit costs. And demand is increasing, with policing remaining the service of last resort – crime typically makes up just 15% of calls to our control room.

Our total gross budget is £223m. 51% of that budget is spent on police officer pay. The Home Office have ring-fenced that funding so that if I were to reduce officer numbers, my budget would reduce by a commensurate amount. So that is 51% of my budget that I have no control over. Roughly a quarter of my budget is spent on contracted third party spend for services such as utilities and maintenance. Under contract, I cannot reduce these overheads. Therefore, it is only roughly a quarter of my budget from where I can make savings and it is the same quarter that I turn to year after year. This is not sustainable.

By the end of the medium term financial plan, our reserves are forecast to be at the minimum appropriate level.

Our contractors are passing on inflationary pressures. The Home Office has increased the charges to police forces for centrally administered ICT systems by 19%. Fees for auditing have increased 151%. We have seen cost increases across fleet, fuel, energy, ICT and accreditation.

Since 2010, Norfolk Constabulary has saved £42 or 20% from its annual policing budget.

I have made the Government aware of these pressures. Policing secured a headline £922m 'additional' funding in the December Settlement. For Norfolk, our slice was £9.3m. However...

- £1.7m was money already announced in the 2021 CSR
- £2.1m was a partial contribution to the costs of the Home Office announced pay award
- £3.9m funds additional employer contributions to the police pension scheme
- £1.6m is temporary funding to support Norfolk offer to over-recruit for one year so that the national target of 20,000 additional police officers is achieved

In short, no new money to assist with inflationary pressures or do deal with growing demand, expectation and regulation.

To balance the books, I have identified £2.8m of savings. These will not be easy savings to make and will result in reductions in vital police staff posts and rationalisation of service.

I have not been able to find the money to allow investment into areas of the service where demand is exceeding capacity.

We are currently undergoing an inspection by HMICFRS. I have no doubt that once again, they will identify areas where further resources are required. They will not tell me where the funding should come from to allow those investments to take place.

As your papers pleasingly highlight, we are performing well as a force:

- Crime down 9.6%
- Second fastest in the country for answering 999 calls
- High detection rates
- Low burglary rates
- Higher arrest rates
- ...and the highest confidence rate in the Country

Compromising any of that is not an option.

But Norfolk is no different to any other force in that we are seeing increases in complex areas of demand:

- More missing people
- More sex crimes
- More child abuse
- More fraud

These crimes are often hidden and not typically resolved through the deployment of uniformed officers. Highly skilled staff, supported by technology are required to address these threats.

There are no alternatives to the PCCs proposal which do not result in a reduction in service.

Even if the PCCs proposal is accepted, there are areas of our organisation short of the funding they need.

I am determined to reduce crime, make our communities safer and improve standards throughout policing. That can only be done with adequate financial support. I have not and will not ask for funding that my organisation does not need, and I do recognise the financial backdrop against which this request is being made. However, it is my job to provide an effective policing response and to keep our residents safe. I have therefore requested that the PCC provides the funding to enable me to do just that.

Complaints Policy Sub Panel – Update

Report from the Chair of the Sub Panel, Mr Peter Hill

The Panel is asked to consider an update from the Complaints Policy Sub Panel.

1. Background

- 1.1 In July 2014 the Government announced a review of the entire police complaints system, including the role, powers and funding of the then Independent Police Complaints Commission (IPCC) and the local role played by Police and Crime Commissioners (PCCs). The proposed reforms form part of the Policing and Crime Act 2017.
- 1.2 This Sub Panel was originally established as a task and finish group, to monitor the development of police integrity reforms and their implications. During the time it took to progress this legislation, the value of maintaining a small group of members with expertise in complaints matters (both relating to the implementation of reforms and PCC conduct complaints) became clear.
- 1.3 The Terms of Reference were refreshed in 2019 and the function of the Sub Panel is currently to: ensure that the PCP has a pool of nominated Members with a specialist knowledge on complaints matters who can advise the Panel accordingly; maintain oversight of the PCP's procedure for handling Police and Crime Commissioner (PCC) conduct complaints; monitor OPCCN's implementation of the Police Integrity Reforms set out in the Policing and Crime Act 2017.
- 1.4 The Panel endorsed these Terms of Reference and appointed the following members on 1 September 2023: Mr Peter Hill (elected as Chair for 2023-24), Cllr Brian Long, Air Commodore Kevin Pellatt and Cllr John Toye. Cllr Alexandra Ware subsequently agreed to take the fifth place on the Sub Panel and be one of the nominated panel members for handling PCC conduct complaints.

2. Information reviewed by the Sub Panel

- 2.1 The Sub Panel met on 7 September 2023. A summary of the information reviewed is set out below.
- 2.2 Angiolini Inquiry – Part 1
 - 2.2.1 The Sub Panel received an overview of key findings of the Angiolini Inquiry, published on 29 February 2024, which examined the abduction, rape and murder of Sarah Everard by an off-duty officer of the Metropolitan Police. Part 1 of the inquiry focussed on examining Wayne Couzens' career and previous behaviour. The report establishes a definitive account of his conduct, behaviour and performance leading up to his conviction, and describes the red flags and

opportunities that were missed. It also made 16 recommendations designed to ensure that everything possible is being done to prevent those entrusted with the power of the office of constable from abusing that power.

- 2.2.2 Members were advised that the PCC will be requesting an update from Norfolk Constabulary on its response to the recommendations at the next Strategic Governance Board meeting, part of the PCC's internal accountability structures. Progress with implementing the recommendations would form part of future public PCC Accountability Meetings and a summary would be incorporated in future Sub Panel briefings.

2.3 Baroness Casey Review – 2023 and Police Dismissal Review 2022-23

- 2.3.1 Members were reminded of the Government's intentions to make changes to the powers afforded to Chief Constables so that they can automatically terminate the employment of those officers who are found guilty of gross misconduct. Guidance and a clear timetable for the introduction of those reforms is still awaited. Until the reforms are implemented, OPCCN will continue to appoint and use Legally Qualified Chairs for misconduct panels, with the legal requirement existing with the PCC.
- 2.3.2 To date there had been no invitation from Government to PCCs or OPCCs to contribute to the practical implementation of these reforms. The Sub Panel confirmed its request to OPCCN to provide a Police and Crime Panel view as part of any local response.

2.4 Independent Panel Member (IPM) recruitment and Legally Qualified Chairs (LQC) Training

- 2.4.1 Members noted the local efforts to move forward with LQC recruitment, which were still essential to enable the existing disciplinary process to function. Despite the proposed reforms, there had been a high level of applications for Independent Panel Member positions and the LQC training in February this year had been well attended. OPCCN currently had access to a pool of 35 LQCs and the eastern region would be retaining their services until 2030. Consideration will be given to how those individuals can be moved into a Legally Qualified Panel Member (LQPM) role once the Government had set out its implementation proposals for the misconduct reforms.
- 2.4.2 The Sub Panel was assured that the necessary resources were available to manage the current misconduct process. It also noted that while the proportion of Police Misconduct Hearings in relation to the size of the force was small, the Chief Constable had publicly indicated that the number of hearings would grow following the implementation of misconduct reforms. This data would continue to be included in the Sub Panel briefings.

2.5 Police Complaint Reviews

- 2.5.1 New legislation relating to reviews of public complaints took effect from 1 February 2020. This changed the Relevant Review Body to Police and Crime Commissioners and the Independent Office for Police Conduct (IOPC), from the

previous Relevant Appeals Body of the Appropriate Authority (the Chief Officer of a police force) and the IOPC.

- 2.5.2 Anyone dissatisfied with the outcome of a complaint made against Norfolk Constabulary has the right to request a review of that decision through the Office of the Police and Crime Commissioner for Norfolk (OPCCN). Details of that process are available to view on the [complaints](#) pages of OPCCN's website.
- 2.5.3 At our 4 March 2024 meeting, OPCCN reported that it had received 197 reviews to date since 1st February 2020 (17 more since the last update report to the Panel in September 2023). 4 of those 197 review requests were not for OPCCN, 33 were not valid, 160 were valid and 26 had been upheld. Reasons for reviews not being valid included requests being made out of time or because they didn't meet the threshold criteria. Review requests were upheld where investigation showed that more could have been done and recommendations could be made. Any reviews of higher threshold complaints (those relating to serious and complex matters) would be dealt with by the Independent Office for Police Conduct.
- 2.5.4 Members noted that the rate of upheld complaint reviews remained similar to that previously reported.
- 2.5.5 The Sub Panel asked OPCCN:
- 1) To include commentary on the proportion of recommendations accepted by the Chief Constable in future briefings;
 - 2) To break down the complaint review statistics into rolling two-year periods, instead of the current rolling four-year period, to help identify any trends.

2.6 IOPC Performance Data

- 2.6.1 The Sub Panel has previously reported that benchmarking data from the Independent Office for Police Conduct (IOPC) is now being published. When we met on 4 March 2024 the comparative data showed that:
- For the reporting period of 1 April 2023 to 30 September 2023, OPCCN received 23 reviews which is lower than the Most Similar Forces (MSF) average of 31;
 - Norfolk OPCCN were conducting their reviews within 53 working days, which was not as good as the MSF average of 45 working days but the same as the national average;
 - Norfolk OPCCN upheld 8% of reviews over the reporting period, which was significantly lower than the national average of 20% and significantly lower than the MSF average of 18%.
- 2.6.2 The Sub Panel noted that the time taken to conduct reviews had lengthened again during the reporting period, owing to the complexity and extent of the material to be reviewed as well as resourcing issues within OPCCN. The Sub Panel was assured that OPCCN had maintained contact with individuals to keep them updated and that additional resource had been recruited.

2.7 Police Super-Complaints

- 2.7.1 The Sub Panel noted that there had been no new super-complaints since it had last met. It also noted that a PCC response was due to be published on an earlier super complaint, submitted by the Criminal Justice Alliance on the police's use of section 60 of the Criminal Justice and Public Order Act 1994 and independent community scrutiny of stop and search.

2.8 Chief Constable Complaints

- 2.8.1 The Sub Panel continues to be briefed on the number and scope of any complaints relating to the Chief Constable and action taken by the PCC. None had been received since the Sub Panel had last met.

2.9 OPCCN Complaint Case Study

- 2.9.1 We are grateful to OPCCN for providing a case study, to help our understanding of policing complaints and the complaint review process. It was an incredibly useful learning exercise and enabled councillors, in particular, to reflect on how they responded to individuals who sought their help with policing complaints.

- 2.9.2 As a result, we agreed that:

- 1) OPCCN's handling of complaint reviews was sound. Not only was the expertise and experience in applying the review request process evident, but also the dedication to helping individuals reach a resolution.
- 2) Signposting complainants to appropriate support was an essential part of the process. A Panel Member offered to assist OPCCN with reviewing templated processes and documentation to ensure this was sufficiently built in, using clear language that was easily understandable.
- 3) Early action taken by skilled individuals could often help to resolve a matter that otherwise might become a complaint. We asked for the next briefing to include an overview of the impact of Early Intervention Officers on policing complaints.

2.10 PCC conduct complaints

- 2.10.1 As previously reported, the Home Office has indicated that it intends to progress the implementation of new Regulations, which will give PCPs greater investigatory powers in relation to PCC conduct complaints. The Home Office has said it will further consider the PCC conduct complaints system as part of the PCC Role Review Stage 2 and it is possible that investigatory powers for PCPs will be incorporated within the outcomes of that piece of work. The Sub Panel will keep these matters under review and recommend any necessary amendments to our local procedure in due course.

3. **Work programme**

- 3.1 The next Sub Panel meeting is scheduled to take place in September 2024.

4. Action

- 4.1 The Panel is asked to consider the update from the Complaints Policy Sub Panel.



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