



ACCOUNTABILITY AND GOVERNANCE BOARD

23rd June 2026

Complaints and Reviews

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Purpose of paper

1. This report provides an update on the work to undertake reviews of complaints made about West Midlands Police throughout the fiscal year 2025-26.
2. The Police and Crime Plan 2025-29 is committed to maintaining effective oversight of the police complaints process, supporting a system that is accessible, fair, efficient and transparent for members of the public. The complaint review process is a vital part of the Commissioner's holding to account function, providing independent scrutiny of complaint handling, accountability and organisational learning.

Background

3. The police complaints system is the mechanism by which the public may raise their concerns about the service they receive from their local police force. The process was updated by the Policing and Crime Act 2017 and the Police (Complaints and Misconduct) Regulations 2020. This is the fifth annual report on complaints and reviews work undertaken by the PCC since the inception of the new Regulations.
4. Police and Crime Commissioners have statutory responsibility for:
 - the local oversight of complaint handling, which is the 'holding to account' function;
 - acting as an independent Review Body for some complaints that have been made through the formal complaints system (these are the complaints which do not have any indication of criminal activity or possible misconduct);
 - dealing with complaints made against the Chief Constable, in a role known as the Appropriate Authority.
5. There are several ways in which we maintain oversight of police Professional Standards Department (PSD). We have an annual report to AGB, and the Commissioner has regular meetings with the Head of the department. In addition, staff meet quarterly with the Independent Office for Police Conduct (IOPC) Oversight Manager, where there is an opportunity to share observations and learning, and where updates relating to the Force Complaints Team are discussed. The IOPC also publishes performance data, which provides a helpful benchmark when compared against most similar Forces.

6. There is also an expectation that PCCs achieve oversight of the complaints function due to the knowledge and insights gained during the complaints review process and use this oversight to influence the complaints system positively. In practice, this means that some of our responses to complaint reviews are communicated to PSD as 'oversight' rather than as a formal response to a complaint review. Oversight meetings are had with the Professional Standards Department on a regular basis; it is typically restricted to organisational learning or the management of complaints.

Complaints Reviews

7. The Complaints Review Manager's (CRM) role is not to reinvestigate the case. Instead, it is to assess the handling of the complaint and whether it has been managed reasonably and proportionately. Following the completion of a review, there is no further right of appeal. If the complainant remains dissatisfied, the only option would be to pursue civil proceedings or a judicial review application. In the year 2025/26, there have been no court proceedings related to complaint reviews. However, we have received 3 Letters Before Action, which generally indicates dissatisfaction with the outcome of a review and an intention to pursue a Judicial Review. The expectation is that public bodies will respond within 14 days. To date, following receipt of our responses, complainants have decided not to proceed with court action.

Headlines

8. In 2020-2021 we received 62 review requests. In 2021-2022 we received 131 requests. In 2022-2023 we received 173 requests. In 2023-2024, we received 80 requests. In 2024-25, we received 114 requests. In 2025-26, we received 118 requests. (see chart at paragraph 18).
9. On average it takes 65 working days to complete a review where the national average is 44 working days (see chart at paragraph 25).
10. 15 reviews (19.5%) were upheld in the year 2025/26, compared to 26 upheld during 2024-2025 (23%) (see charts at paragraph 31).
11. 22 recommendations were made to the Force as a result of reviews received in 2025/26, all of which have been accepted (see graph at paragraph 33).
12. Delivery of duties and service remains the most common allegation theme examined during a complaint review (see charts at paragraph 39).
13. Two dip sampling sessions have taken place during the period 2025/26; the focus was on the WMP Digi Team and PSD Vetting Team (see paragraph 62).
14. At the time of writing there were 41 active reviews and 77 completed reviews, out of 118 total reviews received in 2025/26.

Performance Information

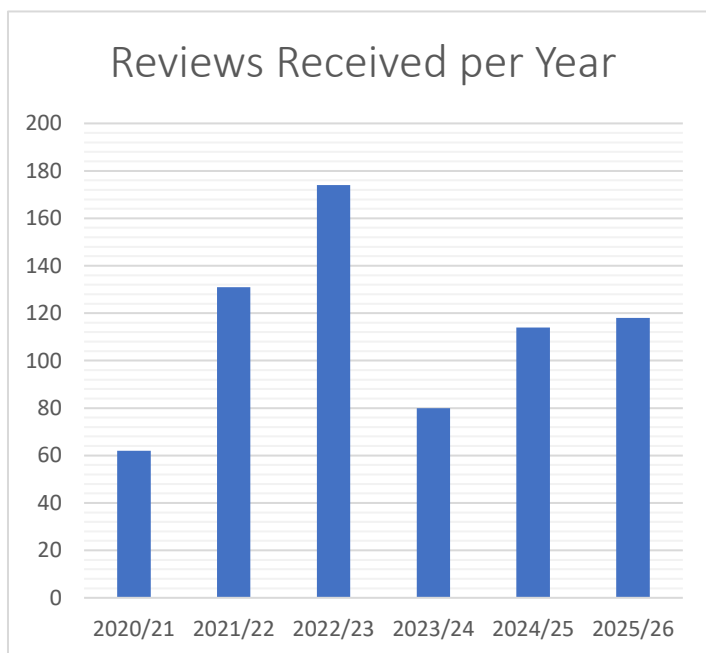
15. The first section of this report is dedicated to performance and covers the following:

- Volume of reviews received.
- Time taken to acknowledge applications and complete reviews.
- Outcomes of reviews.
- Themes/allegations subject to review.

16. All data presented within this report can be found on the OPCC interactive reviews dashboard here: [Police and Crime Commissioner Performance - West Midlands Police & Crime Commissioner \(westmidlands-pcc.gov.uk\)](https://westmidlands-pcc.gov.uk)

17. Data presented within this report covers the financial year 2025/26.

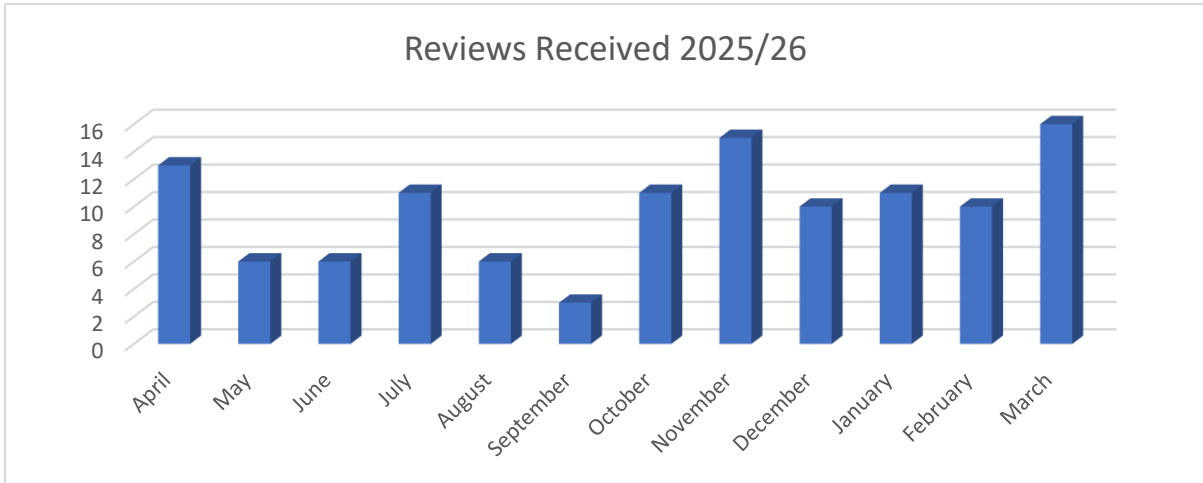
Volume of reviews received



18. The number of reviews has fluctuated since the new Regulations were introduced. In 2020-2021 we received 62 requests. In 2021-2022 we received 131 requests. In 2022-2023 we received 174 requests. In 2023-2024, we received 80 requests. In 2024-2025 we received 114 requests, and in 2025-26, we received 118 requests:

19. Notably the peak seen in 2022/23, and gradual increase starting at the end of 2024 and early 2025 period to end of the 2026 is broadly consistent with periods when PSD experienced an uplift in staffing support.

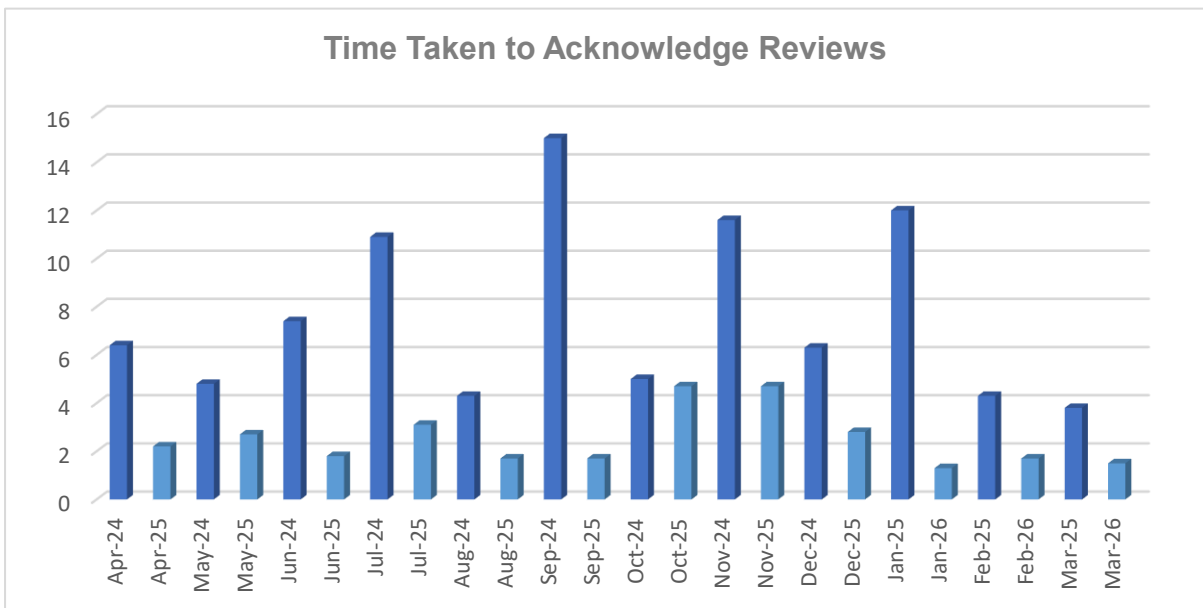
20. The table below provides an illustration of the reviews received in the last financial year:



21. Demand has historically risen between April and August. However, the fluctuations for the 2025/26 financial year have been seen between October and March. Absenteeism, which traditionally has hindered productivity in PSD, has reduced. The team reports as having a full complement of staff, with no long-term sick leave. The Service Recovery Team (SRT) have also been fortunate to receive support from Red Snapper (agency staff). These staff will remain in the department and contracts have been extended. In addition, new staff are now embedded which has notably assisted with timeliness of handling and productivity. It has become evident that, when the SRT in PSD is functioning effectively, this undoubtedly leads to a higher proportion of reviews being received into the OPCC in a shorter period of time.

Time taken to acknowledge applications.

22. Police complaint law does not specify the timeframe within which a complainant must be notified that their review application has been accepted; but the OPCC formally acknowledge requests for review within 5 working days. The chart below illustrates the performance in this regard, for the periods 2024-2025 and 2025-2026. The values are set out in working days:

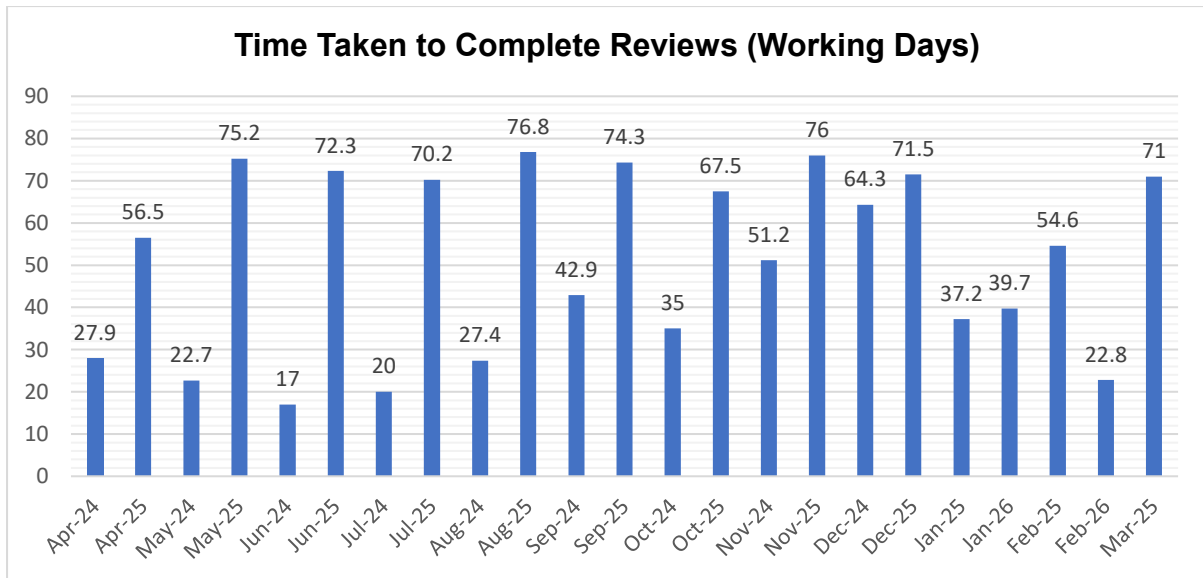


23. The figures show that the average time taken to acknowledge reviews has reduced significantly in the year 2025-26, with the highest monthly average being 4.7 days, as opposed to the highest monthly average of 15 days in 2024/25. This means complainants receive quicker reassurance that their review will be considered by the OPCC.

Completion of reviews

24. A 28-day completion time is applied by the OPCC. However, there is no statutory requirement regarding timing. The average completion time for reviews across 2025/26 was 65 days.

25. The below graph shows how completion times have changed between 2024/25 and 2025/26:



26. The current average completion time across the Most Similar Forces (Greater Manchester, Merseyside and West Yorkshire Police) is 30 days¹; however, the OPCC's performance currently stands at 62 days², for quarter four of 2025/26. The average completion time nationally is currently 44 days³. It's acknowledged that the performance falls below the required standard. This is attributable to a range of factors, including changes in support staff; the uplift in PSD staffing and their ability to maintain a consistent cohort, as well as the complexity of complaints – specifically where AI has been used to generate a response to outcome letters.

27. Additionally, the time to complete a single review should not be confused with the time it takes for a complainant to receive their review outcome. A time tracking exercise demonstrated that the OPCC completed on average three reviews each week (approximately 1.5 – 1.7 days per review), although it was recognised that more complex

¹ IOPC data for Quarter 4 of 2025/26

² IOPC data for Quarter 4 of 2025/26

³ IOPC data for Quarter 4 of 2025/26

cases take significantly longer. The overall turnaround time therefore reflects the period from receipt of a complaint review request to the complainant receiving the finalised outcome. This is influenced by the volume of complaints received in any given period, the capacity of the team and the complexity of each complaint. For example, if a reviews officer can complete three reviews in one week, and five are received, then those that remain generate a backlog. If a review takes an additional day to complete, this presents as another case that's effectively added to the queue of those waiting for attention. Add to that leave or periods of absenteeism, this waiting list expands further. However, the OPCC has put measures in place to address this situation, with a renewed focus set on reducing the turnaround time.

28. In March 2025, apology notes were introduced to inform complainants when reviews are expected to take longer than the 28-day target to complete.

Outcomes of Reviews

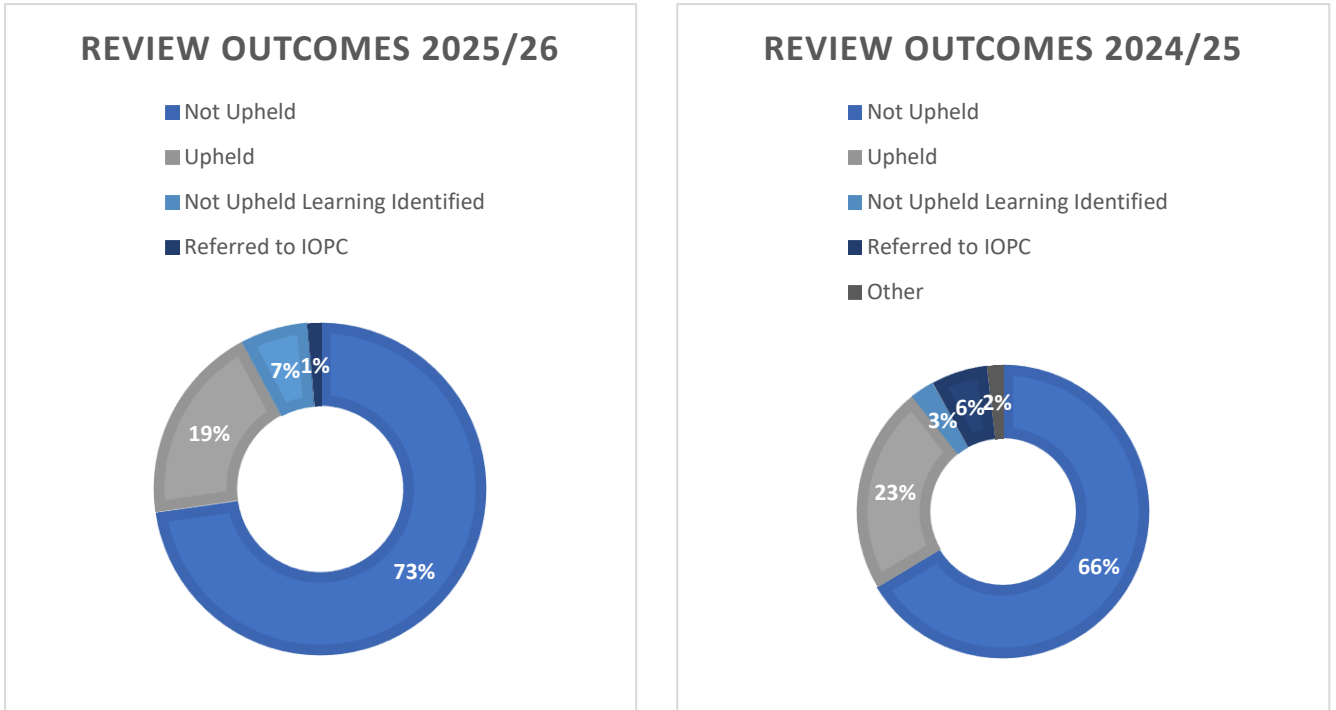
29. No two complaints are the same; and when working through a review, the outcome should be made in consideration of what is reasonable and proportionate; and whether, in the eyes of the wider public, it would be deemed to be so. This will always be subjective as complaints frequently involve grey areas and differing interpretations. Regard must also be given to the pressures placed on officers within the dynamic context of operational policing, and the expectations of complainants.

30. There are a number of possible outcomes set out in the Complaints Regulations. They can be summarised as:

- Review request is not valid.
- The complaint handling and outcome was reasonable and proportionate, the review is not upheld, but organisational learning/oversight is identified.
- The complaint handling and outcome was reasonable and proportionate with no oversight or learning identified.
- Complaint handling was *not* reasonable and proportionate, in which case the following outcomes may be applied:
 - recommend that the appropriate authority refer the complaint to the IOPC;
 - recommend that the appropriate authority investigate/reinvestigate the complaint.
 - make a recommendation/s. Recommendations can be made with a view to remedying the dissatisfaction of a complainant (paragraph 28ZA, Schedule 3, Police Reform Act 2002) or in complaints which have been investigated, recommendations may relate to a person serving with the police (e.g. that the person has a case to answer in respect of misconduct or gross misconduct; or that their performance is not satisfactory);

- recommend that the matter be referred to the Crown Prosecution Service.

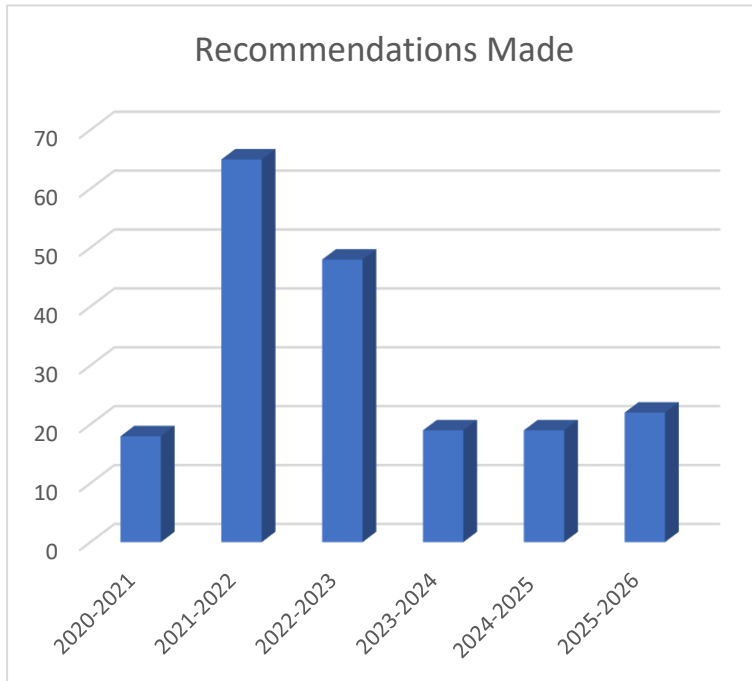
31. The charts below show the outcomes of the reviews the 2025/26 financial year, compared to the 2024/25 financial year:



32. In 2025/26, 19.5% of reviews have been upheld, equalling 15 cases. In comparison, 23% of reviews were upheld in 2024/25, totalling 26 cases.

Recommendations

33. The volume of recommendations made to the Force are represented in the table below:



34. The team monitor Force responses to recommendations and assess whether the learning outcomes have been initiated. This includes reviewing the Force's letter to the complainant when responding to recommendations made, regular meetings between the Complaints Reviews Manager (CRM) and the Service Recovery Inspector.

35. The recommendations are detailed and very specific to the subject of the complaint. Overall, the responses to recommendations are of good quality, informative, helpful, and remedy the complaint.

36. Below is a summary of themes arising from recommendations made by the reviews team in 2025/26:

- Recording and scoping of allegations.
- Greater explanations for complainants of the decision-making processes and assessments of evidence, including retention of Body-Worn Video.
- Timeliness of updates.
- Understanding of disabilities and reasonable adjustments.
- Understanding of why complainants may feel they have been discriminated against.
- Understanding of the distinctions between civil and criminal matters.
- Advice around reporting of fraud.
- Improved identification of cumulative reporting, particularly within harassment cases – ensuring repeated incidents are considered collectively rather than in isolation.

Oversight Matters:

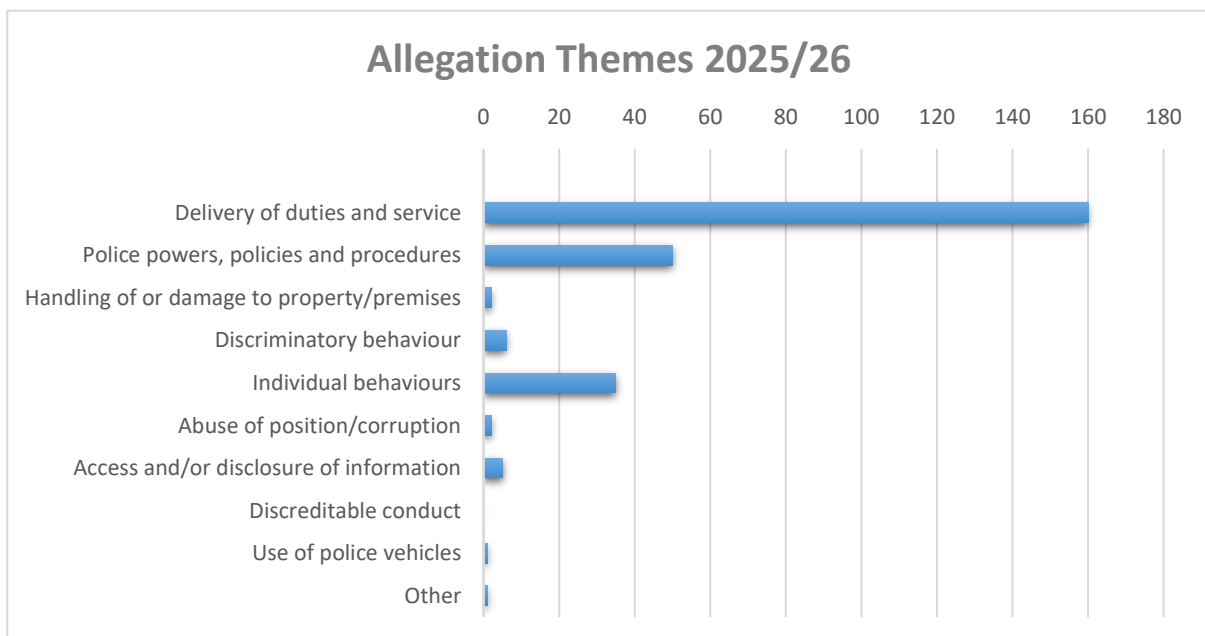
37. Below is a summary of oversight matters raised by the reviews team in 2025/26:

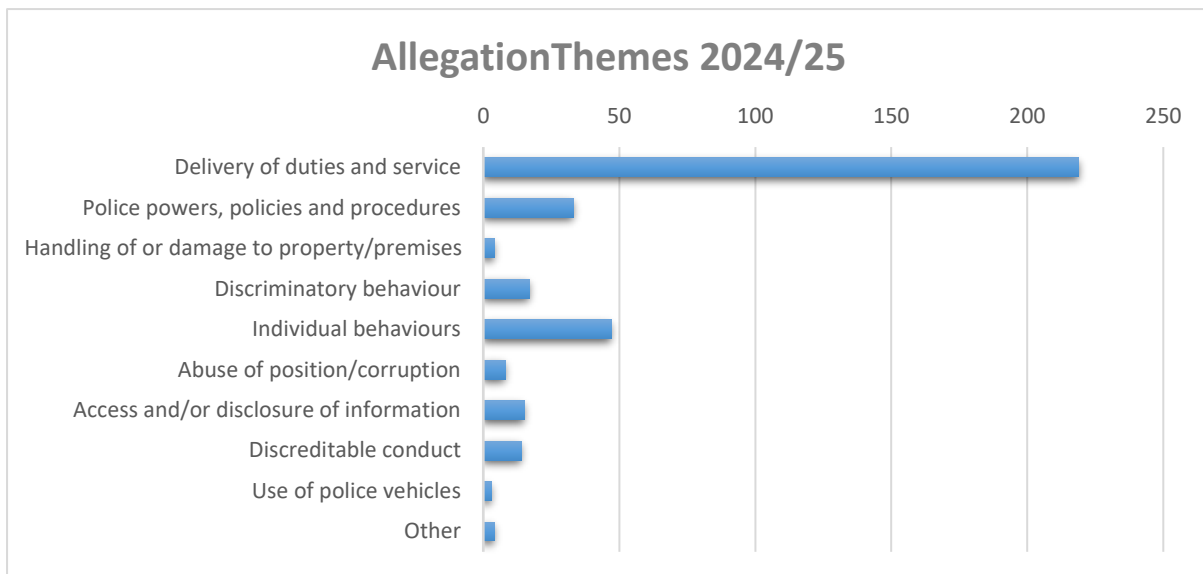
- Making multiple attempts to service recovery a complaint can lead to further dissatisfaction from complainants.

- Complaints submitted via Single Online Home have been sent to local Neighbourhood Teams by Force Contact, rather than PSD, leading to dissatisfaction from complainants.
 - Updates should be provided to complainants during the transition to a new Investigating Officer.
 - Reasonable adjustments should be made for complainants with disabilities.
 - New allegations made following service recovery should be formally recorded as part of a Schedule 3 complaint.
 - Complainants should be sent reminders after a certain period of time to respond to requests for further information.
 - Complaints that have been service recovered should be signed by a named handler.
 - Complainants should be contacted when handling complaints.
38. Oversight matters arising from reviews are raised with PSD and acknowledged, and appropriate remedial action is taken where feasible. Learning is provided for handling officers where appropriate.

Allegations found in complaints subject to review

39. The charts below show the breakdown of the themes of the allegations in complaints that have been reviewed by the OPCC during the 2025/26 financial year, followed by the 2024/25 financial year.





40. It's important to appreciate that the complaint themes overlap, and for some complaints, the handler might tick one box where a specific allegation could fall into two categories. There may also be times when a complaint contains a series of allegations where two or three themes are present.

41. The most common category found in the reviewed complaints is Delivery of Duties and Service. This is hardly surprising, given that this theme relates specifically to the service provided by the West Midlands Police where they engage directly with the public. At the root of these allegations are concerns relating to failures to investigate properly, procedural deficiencies, communication failures, and shortcomings in the discharge of duties. There would be some value in analysing each heading individually to identify the root cause of the allegations and whether any systematic trends are evident, and whether any pro-active measures can be put in place to prevent the allegations occurring in the future or to reduce their frequency and impact.

42. The second highest volume of allegations relate to Individual Behaviours which usually relates to the conduct and behaviour of officers. This might include phone conversations ended prematurely, officers being perceived as abrupt, or not taking matters seriously.

43. The third category, Police Powers, Policies and Procedures, would include, the non-activation of body worn cameras, record keeping, misplaced possessions, the perceived failure of officers who incorrectly apply the law, and generally where complainants suggest that officers did not follow policy.

Oversight Improvements – Increasing oversight (Police and Crime Plan)

44. The Commissioner's Police and Crime Plan asks that the complaint team improves and maintains oversight of the Professional Standards Department. Aligned to this aspiration, the team have initiated three projects.

45. Learning report

46. Learning runs like a steady current through the legislation. For this reason, it became a focal point for the Commissioner's Police and Crime Plan.
47. The learning report was the first of kind insofar as it collates the learning that derives from complaints, including that recommended by the IOPC. It provides an overview of the actions taken and the reasons why the learning was recommended in the first place. It is intended that this will become an annual report subject to review by the Commissioner. However, it became apparent that the learning recommended by the Service Recovery Team and Reviews, whilst it had been captured, there was no evidence to suggest a) that it had been delivered, b) by whom and c) when. Professional Standards has now implemented a process intending to capture and monitor these areas. The effectiveness will be reviewed at a later date.
48. Misogyny training
49. In light of the high-profile cases in which female officers have raised concern regarding misogynistic behaviour amongst colleagues, work is currently underway to explore how officers can be better trained in these areas, particularly where early signs are showing, and concerns have been raised regarding their behaviour. At the time of writing this report, work was ongoing to identify appropriate interventions, training and mechanisms for development.
50. Delivery of death messages
51. As a result of reviewing complaints where death messages had been communicated by officers, PSD and the OPCC collaborated to ensure that new recruits are provided with detailed training when communicating a loss to a family member. The Learning and Development lead for the force confirmed that they would be creating a new training package for delivery.

Further Observations/Themes found in complaints.

52. Neighbourly Disputes
53. Neighbourly disputes are a recurring theme found in complaint reviews. Complainants are often dissatisfied with the manner in which officers have dealt with their concerns. The disagreement between two parties can continue over several years, with both sides making counter allegations and new officers becoming involved over time. This can sometimes result in poor decision making where conflicting information is provided by a series of different officers.
54. In many cases, a disproportionate reliance is placed on the use of orders as a means of resolution, but the implications of acceptance are not always fully explained to those involved. This can result in further complaints, and the withdrawal of the order.
55. These matters will often develop into lengthy complex complaints, involving allegations against multiple officers spanning several years. There would be some value in

encouraging the West Midlands Police revisit its approach, particularly on consistency of decision making and early intervention.

56. Traffic Collisions

57. The Traffic Investigation Unit has a policy whereby, unless someone has suffered injury, they will not investigate collisions unless the victim is able to provide the registration number of the offending vehicle. However, complainants are not always in a position to obtain this information after a collision as they may well be distressed, or the driver has left the scene quickly.

58. In cases where incidents have occurred in a car park and the CCTV evidence is available, officers have declined to retrieve the footage, and at the same time, the owner of the car park is unwilling to release it to anyone other than the police. This leaves the complainant in a position where relevant evidence exists, but it is effectively inaccessible. There may be some benefit in having WMP review this approach.

59. Investigations

60. Colleagues will recall that in November 2023, the Force was placed into special measures by HMICFRS over concerns including poor investigations and failures affecting victims. Operation Vanguard was introduced to strengthen investigation standards and included widespread retraining across departments. The OPCC supported the process and provided some feedback based on the concerns that had been raised in complaints. Based on those that were reviewed and the associated crime reports, there is an informed impression that improvements have been made, specifically centred around the victim. These include:

- Improvements in the crime reports layout with additional information.
- Workload notes are more thorough and show the officers thoughts process about the next steps required to progress the investigation.
- The context is explained in greater detail.
- Notes that explain the safeguarding measures that have been put in place.
- Notes explain the findings of the reviewing officers where at times the decision has been reversed and a case reopened.
- The risks are considered with a detailed rationale.
- VRR is openly offered.
- There are less incidents or complaints relating to custody and the process.
- Contact plans are agreed; whereby regular updates are provided to victims.
- If there are no updates, the victim is advised that the case is ongoing.
- Conversations are had with victims where matters are explained, specifically when a case is filed.

61. However, some ongoing concerns have been noted, particularly around the transition of investigations between officers when cases are handed over partway through. This might occur for a number of understandable reasons including sickness, annual leave, staff shortages, promotion or changes in role. These transitions can sometimes lead to lengthy delays where continuity is lost. This becomes particularly significant where

the Limitation of Proceedings (LOP) timeframe is breached, resulting in victims being told that there is no longer sufficient time to proceed to the Magistrate's Court for crimes such as harassment, common assault and criminal damage.

Dip Sampling

62. We have undertaken two dip sampling sessions during the year 2025/26. The first session featured the complaints handled by the 101 Digi Team. The second focused on the Vetting Team which is housed within Professional Standards.

The 101 Digi Team

63. When complaints are made, they are triaged by The Digital Desk, a team housed in Force Contact. They are responsible for triaging the cases and determining whether the reported concerns are suitable for local resolution or whether they should be referred to Professional Standards for further consideration. The OPCC reviewed 30 complaints. The participants found that, in 67% of cases, the complaint was referred to PSD. When sending the complaint to local units to be resolved, it was often to a sergeant who was left to deal with it. The data suggested that 33% of the reports made were triaged within a day, whilst others ranged between 2 and 4 days maximum.

64. The Dip Sampling session raised some additional questions that would benefit from further exploration at a later date. These include the overall volume of complaints that are referred to the local neighbourhood teams, the outcomes achieved, the consistency of the decision making, and whether it could be considered reasonable and proportionate.

The Vetting Team

65. This session was the first of its kind. It was noted that the paperwork associated with each case can run into several pages and can be quite lengthy. The sampling team was small, as it was important that the attendees were vetted to management level. This, in of itself, dictated the smaller sample size. There were 5 participants each person worked through one case. In all cases, the applicant had been refused vetting, and the decision had been subject to an appeal. Before participating, the OPCC staff were presented with slides from the vetting team to explain the processes in place since vetting is governed by legislative framework.

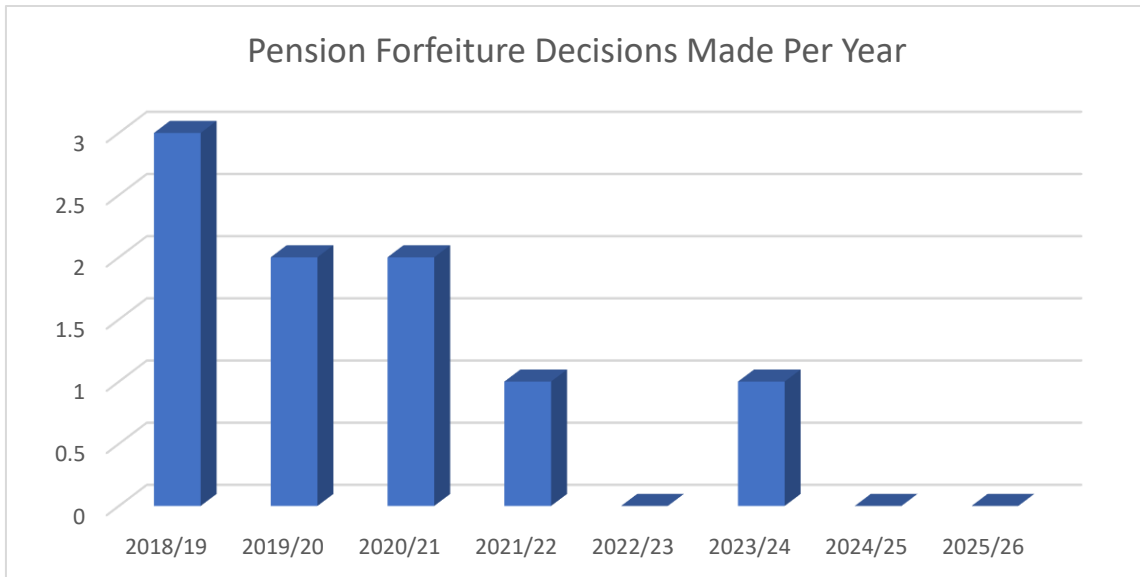
66. However, at the time of writing, the report had not yet been finalised, so we are unable to publish the data. The completed document will be published on the OPCC web pages once finalised.

Pension Forfeiture

67. In the very small number of cases where police officers are convicted of serious criminal offences, and their offending was carried out in connection with their role as a police officer, the Commissioner has the power to forfeit part of their police pension.

68. In the year 2025/26, there have been no pension forfeiture decisions by the PCC. Four pension forfeiture decisions are currently under consideration.

69. All pension forfeiture decisions are published on the OPCC website.



Legal and Financial Implications

70. The staff costs associated with the complaints review function are contained within the budget of the Police and Crime Commissioner.

71. The framework for managing police complaints and reviews is heavily regulated, and is contained in the Police Reform Act 2002, and the Police (Complaints and Misconduct) Regulations 2020.

Equality Implications

72. The oversight and scrutiny function related to complaints and professional standards will consider how effective the Force is in delivering a complaints process which is equality driven. To assist with this, dip sampling exercises focus partly on equality and potential discrimination during the complaints process. The Police and Crime Plan includes a commitment to advancing equality, diversity and inclusion, and this is reflected in our oversight work.

Next Steps

73. The board is asked to note the contents of this report.