



Complaints & Conduct Committee

13 November 2025

Minutes of the Complaints & Conduct Committee held on 4 September 2025 via Webex

Board Members present:	Katharina Kasper (Committee Chair) Paul Edie (Committee Member) Chris Cregan (Committee Member) Angela Leitch (Committee Member)
Board Member apologies:	
In attendance:	<u>SPA</u> Darren Paterson, Head of Workforce Governance Gary Price, Complaints and Conduct Co-Ordinator Colette Craig, Governance Support Officer <u>Police Scotland</u> Alan Speirs, Deputy Chief Constable Lynn Ratcliff, T/Assistant Chief Constable Helen Harrison, Chief Superintendent Nathan Calderwood, Detective Superintendent James Mann, Superintendent <u>PIRC</u> Ilya Zharov, Head of Reviews and Policy Raymond Brown, Head of Investigations <u>HMICS</u> Craig Naylor, HM Chief Inspector of Constabulary in Scotland

1. Introduction and Welcome:

1.1 Chair's Opening Remarks

The Chair welcomed attendees to the meeting and welcomed Angela Leitch to her first meeting of the committee.

1.2 Apologies

None.

1.3 Declarations of Interest and Connections

None.

1.4 Any Other Business

None.

1.5 Decisions on taking business in private (Item 11 – 14)

Members **AGREED** to take Items 11 – 14 in private.

2 Minute and Actions from previous meeting:

2.1 Minute from meeting held on 5 June 2025 for approval

Members **AGREED** the Minute of the meeting held on 5 June 2025 as an accurate record of the meeting.

2.2 Public Minute of Private Meeting held on 5 June 2025 for approval

Members **AGREED** the Public Minute of the private meeting held on 5 June 2025 as an accurate record of the meeting.

2.3 Rolling Action Log and Matters Arising

The Committee **APPROVED** the action log, noted the updates provided.

2.4 Decisions since last meeting

Members **APPROVED** a minute, via email correspondence, from a Complaints and Conduct Committee held on the 26th June 2025.

3. Police Scotland Professional Standards Performance Report (Q1)

Members were provided with a report noting statistical information on the overarching performance activity in relation to complaints and conduct matters about members of Police Scotland for period (1 April 2025 – 30 June 2025). During discussions the following matters were raised:

- Members welcomed the increase of complaints dealt with via Front Line Resolution (FLR) and were advised that the close review of procedures and processes along with other small changes was perhaps what has brought this improvement forward to swiftly conclude matters for complainers.
- In terms of best value, Members sought clarity around the proportionality, categorisation, and action taken against subject officers either suspended or on restricted duties. T/ACC Lynn Ratcliff (T/ACCLRatcliff) advised that more often officers are on restricted duties or suspended due to complaints against the police, however, this does not always translate into misconduct or gross misconduct. Members were advised that restrictions are a protective measure for both the officer and the public. Restrictions and suspensions are very carefully considered in the context of the allegation and continually review. Suspensions must be signed off at Assistant Chief Constable level which follow two criteria, the continued presence of the officer may frustrate or interfere with the conduct or misconduct investigation or it may be in the public interest to suspend, both areas are very carefully considered. Suspensions are reviewed every 28 days by the Deputy Chief Constable and restrictions are subject to continual review. Police Scotland understand Best Value concerns and assured members that protecting the public and officers is of upmost importance whilst investigations are ongoing. Members welcomed this explanation, however, highlighted the possibility for PS to reconsider the categorisation and proportionality of cases.
- Members noted the committees previous request for an annual Organisational Learning report. Members noted that the content of quarterly reports is limited to learning identified by PIRC and although valuable, not the same as pro-active identification by PS. Chief Superintendent Helen Harrison (CSHHarrison) advised that she can consider how this area can be developed for future committee reporting. Ilya Zharov (IlyaZharov) advised that following some audit work carried out by PIRC there has been a better capture of learning that has been identified by the Professional Standards Department (PSD), therefore believed that it is data that can be drawn out from statistics and into future reports.

- PIRC welcomed the increase in relation to FLR and closure rates, however, sought clarity in relation to the decrease in complaints and whether there had been any analysis done to identify the route cause or driver behind that. CSHarrison advised that PS are too early in the year to identify and reflect on any trends, however, agreed a need to understand this area by reflecting on changes in process, what is received from the user satisfaction survey and feedback from the National Complaint Handling Development Group (NCHDG).
- The Chair welcomed the discussion around proportionality of conduct in relation to suspensions and restrictions and noted some recent media reporting in this area and sought assurance from PS in relation to that. T/ACCLRatcliff advised members that recent decisions in relation to officers within the fire arms department were taken by operational support and not by PSD.

Members **NOTED** the report and **AGREED** the following action;

20250904-CCC-001: Chief Superintendent Helen Harrison to consider how Organisational Learning could be captured within future report to the committee.

4. SPA Quarterly Report (Q1)

Darren Paterson (DPaterson) provided a report updating members on complaints and conduct matters including key statistics reflecting the position at the end of Q1, 2024/25. During discussions the following matters were raised:

- Members sought clarity on the progress associated with the PIRC's requirement that the SPA reconsider a previous private decision in relation to 2 complaint allegations. Members were advised that the team have progressed the additional work to support the reconsideration.

Members **NOTED** the report.

5. PIRC Report on Police Scotland Handling of Complaints and Referral Investigations (Q1)

Members were provided with a report detailing key statistics reflecting Quarter 1 2025/26. Ilya Zharov (IZharov) provided a detailed summary of the report which noted statistical information in relation to PIRC Complaint Handling Reviews (CHR's). Raymond Brown (RBrown) provided an overview on the Referral Investigations. During discussions the following matters were raised:

- Members welcomed the report and PIRC's interpretation of the data and advised that they would be keen that the committee have sight of the reflective learning that was identified.
- Members noted that there would be benefit in having an overview of outstanding recommendations from various audits and scrutiny bodies, to identify similarities and priorities and what is being progressed. RBrown advised members on the process in relation to recommendations from PIRC to PS.

Members **NOTED** the report and **AGREED** the following action;

20250904-CCC-002: Chief Superintendent Helen Harrison share reflective learning referred to within PIRC reports with the committee.

6. Police Scotland Professional Boundaries

Members were provided with an update on progression of the Recommendations of the 2024 review conducted into Police Perpetrated Domestic Abuse. During discussions the following matters were raised:

- Members were advised that domestic and sexual offences have now been brought into one workstream with a broader remit a part of bi-annual reports. Members welcomed this consistent approach which will assist with trend data and organisational learning.
- Members noted that timescales around the implementation of some recommendations had slipped and sought clarity over the delays. Members were assured that progress was being made with all recommendations, with continuous improvement and appropriate governance in place.

DCC Alan Speirs left the meeting at this point.

Members **NOTED** the report.

7. Complaints Handling Backlog (Operation Glade)

Members were provided with an update in respect of the non-criminal complaint's portfolio within Professional Standards Department (PSD). During discussions the following matters were raised:

- Members were reassured by work being undertaken in this area.
- Members sought clarity on whether there were timelines associated with best practise improvements, and were advised that there are

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some short, medium and long term plan in terms of viable options currently available. Members were provided with a breakdown of a recent week performance matrix, highlighting real productivity as a result of learning from West Midlands.

- Members sought further assurance that these practises were being supported throughout the organisation and that there was suitable resource to take it forward. T/ACCLRatcliff agreed that some of the work is reliant on support and resource from other areas of PS. Members were advised that conversations had taken place with other colleagues who understand how imperative it is and the impact it has on public trust and confidence. T/ACCLRatcliff advised that despite other competing demands, there is support from other areas of the business who are willing to align resource.
- Members also sought clarity on the detail of the presentation by West Midlands Police to demonstrate areas they improved to reduce a large complaints backlog. T/ACCLRatcliff advised that the presentation was a helpful resource, however the financial position and workforce mix is different from PS and there is a need for PS to adhere to PIRC Complaint Handling Guidelines. The Chair requested an offline briefing on the West Midlands presentation.
- Members noted the value of the civilian investigators and the need for action to be taken to retain that resource given its impact. T/ACCLRatcliff agreed that they have made a real impact and there is a lot of budget and workforce mix discussions taking place to ensure the balance is right but with a focus to retaining as many civilian investigators, due to their skill set and value along with the possibility of allowing warranted officers back to frontline roles. T/ACCLRatcliff committed to bringing forward a further update on this to a future committee.
- IZharov noted that the overall outstanding complaints remained quite significant and sought clarity on whether they were tracked in age and how many were over the 56 days noted within the statutory guidance. PS advised that the ages are tracked and worked through in terms of category and advised that she will engage with PIRC in relation to timescales.
- The Chair thanked staff for the focus in this area, noting that the growth on productivity provided members with a degree of confidence. The Chair requested that the data currently within in the report was presented in tabular format to assist members on how the composition of different areas is changing.

Members **NOTED** the report and **AGREED** the following actions:

20250904-CCC-003: Assistant Chief Constable Lynn Ratcliff to share a briefing following a presentation received from West

Midlands Police which demonstrated areas they had improved to reduce a large complaints backlog.

20250904-CCC-004: Assistant Chief Constable Lynn Ratcliff bring forward a further update on action to be taken to retain civilian investigators, given its impact of that resource.

20250904-CCC-005: Assistant Chief Constable Lynn Ratcliff to ensure that the data currently within in the Complaint Handling Backlog (Operation Glade) is presented in tabular format to assist members on how the composition of different areas is changing.

8. Police Scotland Vetting Annual Report

8.1 HMICS Assurance Review of Vetting – Progress Update

Members were provided with a Vetting progress update, including the ongoing work to monitor disproportionality within the vetting process. In addition, members were updated on the discharge of the 2023 HMICS Assurance Review of Vetting Policy and Procedures within Police Scotland report, published on 3 October 2023. During discussions the following matters were raised:

- Members sought clarity around the 6/10 BME applicants that they were refused through vetting. PS confirmed that was the case, an increase on the previous year and following a deep dive into a review of the applications, it confirmed that the decisions taken were correct. Members were reassured that this is an ongoing area of monitoring, whilst linking in with Policing Together and the recruitment team.
- Members sought clarity on the timescales in achieving the vetting application form. CSHHarrison believes it will align with the introduction of Police Scotland development of an Operating Authorised Professional Practice (APP). A further update will come to the next committee.
- Members sought clarity on the implementation of the Police (Ethics, Conduct & Scrutiny) Scotland Act 2025. PS confirmed that the Act came into commencement at the end of June 2025, however, only parts were implemented at that point. The vetting part is delayed until the vetting regulations have been developed by Scottish (SG) Government. Police Scotland continue to feed into this with SG as it is critical for PS to be aligned to the Code of Practice and that the APP I revised, developed and aligned.

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- Members were advised that the consultation noted within recommendation 3 had been delayed due to a number of points raised during consultation that PS are working through and an update will come to the next committee meeting. PS confirmed that this will be reflected in various risk registers presented to the ARAC.

Members **NOTED** the report and **AGREED** the following actions:

20250904-CCC-006: Chief Superintendent Helen Harrison to provide an update on the timescales in achieving the vetting application form.

20250904-CCC-007: Chief Superintendent Helen Harrison to provide an update on the delay in relation to consultation noted within Recommendation 3 (Police Scotland should introduce a programme so that officers and staff who hold only Recruitment Vetting are re vetted at least every 10 years).

9. The Code of Ethics for Policing in Scotland

Members were provided with a report which provided an update in relation to Police Scotland's ongoing activity to develop the Code of Ethics for Policing in Scotland as will be required under the Police (Ethics, Conduct & Scrutiny) Scotland Act 2025. The report aimed to provide assurance to the committee and to seek agreement to progress with the preferred option to formal consultation with stakeholders, as required under the act. During discussions the following matters were raised.

- Members welcomed the opportunity to understand process in relation to this.
- Members sought clarity for the rationale for the omissions in relation to Duty of Candour compared to what is in the legislation. CSHHarrison advised that she would reflect on that and report back to the committee with a clear rationale.
- DPaterson sought assurance, from an SPA perspective, that there was nothing within the principles standards or codes which was identified which would justify further amendment beyond what has already been done. CSHHarrison advised that she would reflect and report back to the committee, however, reassured the committee that PS are taking every part of the act is being considered to ensure it is applied in the development of the code.
- The Chair asked that a final draft of the code is circulated to members ahead of the next committee meeting for consideration.

Members **NOTED** the report and AGREED the following actions;

20250904-CCC-008: Chief Superintendent Helen Harrison to provide clarity around the rationale for the omissions in relation to Duty of Candour compared to what is in the legislation in relation to The Code of Ethics for Policing in Scotland.

20250904-CCC-009: Chief Superintendent Helen Harrison to provide the final draft of the code is circulated to members ahead of the next committee meeting for consideration.

11. Committee Work Plan

PS and SPA officials should discuss a number of thematic reports to understand when these reports can come forward to committee and bring clear dates in relation to the work plan for the next committee meeting.

Members **NOTED** the report.