

FOI Disclosures May 2020

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This month we have responded to questions relating to the following topics:

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If you require a full copy of any of the embedded attachments, please contact Requestinfo@policeconduct.gov.uk quoting the reference number from the relevant response.

Ref 1008356 <small>Back to top</small>	<u>Procurement of IT services</u>
<u>Request</u>	<ol style="list-style-type: none">1. <i>Does the organisation outsource and use 3rd party suppliers under IT Hardware/ software, IT support, IT services and communication?</i>2. <i>If so who are the suppliers/resellers used and what has been the spend with them in the last 6 months?</i>3. <i>Who are the contacts/procurement in the organisation to speak with in order to get added as an IT supplier to the organisation?</i>4. <i>Who are the IT managers in the organisation in place and their contact details?</i>
<u>Response</u>	<ol style="list-style-type: none">1. <i>IT Hardware/Software:</i> The IOPC purchases hardware from suppliers on a number of government frameworks, most often via the Crown Commercial Services Framework. Hardware is built and issued by IOPC staff. Software support first line is in house, second line is from the reseller and third line is from the software vendor.- <i>IT Support :</i> The IOPC has an in-house team providing 1st – 3rd line support

	<p>- <i>IT Services and communication:</i> We confirm that the IOPC has two major partners: Cancom for O365 and Redcentric for networking and telephony.</p> <p>2. Hardware: £620,286.80 with the following suppliers: Probrand, Sopra Steria, ACS, Banner, Insight, Software Box, Akhter, Total Communication Networks, Ergo, Bechtle and Sight & Sound.</p> <p>Services/Software/Licences: £825,967.73 with the following suppliers: Cancom, CDW, Redcentric, Sopra Steria, ACS & SoftCat PLC.</p> <p>Communications: £36,591.80 with Freedom Communications.</p> <p>3. Procurement Team.</p> <p>4. ICT Team. Please see contact details above.</p> <p>In relation parts 3 and 4 of your request, we would emphasise that we are a Public Sector organisation governed by the Government procurement rules and regulations and, as one of the Home Office ALBs, we are also are governed by the Home Office procurement rules. All our goods and services are therefore procured via government frameworks or following our own procurement process. This means that we do not approach individual companies directly for procuring goods and services.</p>
<p><u>Ref</u> <u>1008309</u> Back to top</p>	<p><u>Coronavirus contingency plans</u></p>
<p><u>Request</u></p>	<p><i>Please disclose your contingency plans for dealing with the coronavirus crisis (in terms of preventing the spread of the virus at work, how cases are/will be dealt with and work arrangements for staff during the different phases of the Government plans for dealing with coronavirus).</i></p>
<p><u>Response</u></p>	<p>The IOPC has in place a range of existing policies and practices such as flexible working and remote access which have enabled staff to work from home or remotely for some time.</p> <p>Our response to the coronavirus has had to be flexible and adaptive to constantly changing circumstances, which means no single document outlines our response plan for staff.</p>

	<p>All staff have been working remotely since the lockdown was announced and all our offices remain closed.</p> <p>In terms of health and safety, we have followed NHS and Public Health England guidance, and have communicated this with staff since early March.</p> <p>If our staff are too ill to work, it counts as a special period of sickness that is payable and doesn't count towards their contractual sickness entitlement.</p> <p>We have adapted key HR and corporate policies as needed and made appropriate arrangements for people with additional needs.</p> <p>This statement from our website outlines changes to our operational work at this time. We are continually reviewing this.</p>
<p><u>Ref</u> <u>1008357</u> Back to top</p>	<p><u>Funding of the IOPC</u></p>
<p><u>Request</u></p>	<p><i>How much does the IOPC cost to operate on an annual basis and how is it funded?</i></p>
<p><u>Response</u></p>	<p>We publish a statement of accounts covering operating cost of the IOPC annually as part of our Annual Report. The latest Annual Report is for 2018/19 and is published on our website via the following link:</p> <p>https://www.policeconduct.gov.uk/sites/default/files/Documents/Who-we-are/accountability-performance/IOPC annual report and accounts 2018-19.pdf</p> <p>The financial statements, which appear from pages 82 onwards will be of particular interest in answering your question.</p> <p>The report for 2019/20 will be published in due course.</p> <p>The activities of the IOPC are primarily funded by the Home Office. Further information regarding the funding of the IOPC can be found within the notes at page 86 of the enclosed Annual Report.</p>
<p><u>Ref</u> <u>1008365</u> Back to top</p>	<p><u>Disclosures under the Prescribed Persons Regulations</u></p>
<p><u>Request</u></p>	<p><i>Under the Prescribed Persons (Reports on Disclosures of</i></p>

	<p><i>Information) Regulations the IOPC must act on any third party disclosures made about malpractice.</i></p> <p><i>I would like to receive a list of all disclosures from 1 January 2015</i></p> <p><i>For each disclosure I would like to request:</i></p> <ul style="list-style-type: none"> <i>-Date of disclosure</i> <i>-Summary of disclosure</i> <i>-Action taken</i> <i>-Organisation that the disclosure is connected to</i>
<p><u>Response</u></p>	<p>Our interpretation of your request is that you are seeking information about the “workers disclosures” on which the IOPC has or would have reported under The Prescribed Persons (Reports on Disclosures of Information) Regulations 2017. This requires that the IOPC, as a “relevant prescribed person”, must publish a report for the workers disclosures it has received during the 12 month period beginning on 1 April each year. As you may be aware the IOPC is the prescribed person for matters relating to the conduct of persons serving with the police and the other bodies to which our functions relate.</p> <p>The data on which we report under the Regulation relates to use of our report line, which exists for persons serving with the relevant bodies to report concerns of wrongdoing in their workplace.</p> <p>The majority of the concerns raised with the IOPC are about either corruption, discrimination or failures to investigate the concerns raised. We have various options for dealing with calls to our report line. The action we take will depend on the seriousness of the concerns raised, but we must obtain the reporter’s consent before passing any information to a police force.</p> <p>We can confirm that the IOPC received 289 workers disclosures in the period from 1 January 2015 to 30 April 2020. The table below discloses the number of reports received in each year, separated by Appropriate Authority (i.e. the police force or other relevant body).</p>

	2015	2016	2017	2018	2019	2020 (to 30 April)
Avon and Somerset Constabulary					1	1
Beds	1	1			1	
BTP	4		3	2	2	
Cambridgeshire	2	1	1			
Cheshire Police			1	1		
City of London Police		1	1		2	
Civil Nuclear Police	2			2		
Cleveland			1	3	1	
Cumbria	1	1			1	
Derbyshire	1		1			
Devon and Cornwall Police	2	1		4		
Dorset	3			1		
Durham	1					
Dyfed-Powys	1	2			1	
Essex	3		1	1	2	
Gloucestershire	2	4	2		1	
GMP	3	3	2	1	4	
Gwent	1	1		1		
Hampshire	1					
Hertfordshire	1			1	2	
HMRC					1	
Humberside	2		1	3	1	
Kent	1					
Lancashire	1	1	1		1	
Leicestershire			4	2		
Lincolnshire			1		1	
Merseyside Police		1		2		
MPS	12	10	9	33	11	
Ministry of Defence	1	1			2	1
Norfolk			1			
North Wales Police			1		1	1
North Yorkshire Police			3		1	1
Northamptonshire			1	1		
Northumbria	3		1	1		
Nottinghamshire Police						1
SOCA/ NCA	1				1	
South Wales Police	2	1	1	1		
South Yorkshire Police	2		1			
Staffordshire Police				1		
Suffolk Constabulary				1	1	
Surrey Police		1		1	4	
Sussex			1		1	
Thames Valley Police	4	1	1			
UKBA					1	
Unknown	2	1	1	2	4	2
Warwickshire Police					2	
West Mercia					2	
West Midlands	3	3	4	4	2	
West Yorkshire	3	2	2		2	2
Wiltshire	3	1				
	69	38	47	69	57	9

As to the action taken by the IOPC, one of these 289 reports resulted in an IOPC investigation. This report was received in 2017 and related to the Metropolitan Police.

In all, five reports from this period resulted in the dissemination of

intelligence reports to the Appropriate Authority. These originated from:

- three reports received in 2015 (relating to Devon and Cornwall Police, Metropolitan Police and South Yorkshire Police)
- one report received in 2017 (relating to Metropolitan Police), and
- one report received in 2018 (relating to Devon and Cornwall Police)

The remaining 283 reports were suitable to be dealt with by the relevant force.

The data we are releasing has been aggregated in this way because providing the particular data you require would be likely to result in the identification of individual reporters or related matters.

We have decided that we are not obliged to disclose the more specific information you have requested because it engages the exemptions under section 30(2) and 40(2) of the FOIA. In the case of information to which section 30(2) applies we are refusing your request after concluding that the public interest in maintaining the exemption outweighs the public interest in disclosure.

Section 40(2) is an absolute exemption meaning that there is no requirement to consider the balance of the public interest before deciding that the information can be refused.

Section 30(2) – information relating to confidential sources

Section 30(2) exempts information that relates to the obtaining of information from confidential sources. This exemption applies when the information is held in connection with the public authority's investigations or proceedings *and* relates to the obtaining of information from confidential sources. In this instance the information relates to the IOPC's functions under section 30(1)(a)(i) and section 31(2).

As stated in guidance from the Information Commissioner, a confidential source is a person who provides information to an investigation on the basis that they will not be identified as the source of that information. The information you are requesting is connected with information about persons who have provided information to our report line in the expectation that their identities

will remain confidential.

Section 30(1)(a)(i) is relevant because some of these reports are obtained or recorded for the purposes of investigations that the IOPC has a duty to conduct with a view to it being ascertained whether a person should be charged with an offence. This is because, when an investigation is complete, the IOPC is required to consider whether the evidence indicates that a criminal offence may have been committed and, if it does, to refer the matter to the Director of Public Prosecutions.

This information is also held in relation to the IOPC's functions under section 31(2)(b), namely: "*the purpose of ascertaining whether any person is responsible for any conduct which is improper*". In addition to invoking the IOPC's specific functions in regard to the investigation of police misconduct, this FOIA provision encompasses the IOPC's core purpose of securing and maintaining public confidence in the arrangements for dealing with police complaints and misconduct in England and Wales.

We conclude, therefore, that section 30(2) is engaged by these parts of your request.

Information can be refused under section 30(2) only when the public interest in maintaining the exemption outweighs the public interest in disclosure. Our assessment of the balance of the public interest is as follows.

The public interest in refusal under section 30(2):

As stated in the Information Commissioner's guidance, information received from confidential sources is essential to effective law enforcement. Any disclosure that may reduce the flow of information from such sources would prejudice the ability of law enforcement agencies to obtain reliable and accurate intelligence and identify, apprehend and prosecute potential offenders. The disclosure of information that would or would be likely to compromise the effectiveness of important law enforcement measures, including specific investigations to which these reports may relate, is clearly not in the public interest. In addition, it would not be in the public interest to place such sources at risk of exposure by releasing information that could lead to them being identified.

Our reasons for concluding that the requested information would be likely to identify a confidential source, or other individuals connected to a matter reported to the IOPC report line are set out later in this letter in relation to section 40(2).

In the case of IOPC investigations, the inappropriate identification of a confidential source would be likely to result in reputational damage, to the detriment of the IOPC's capacity to fulfil its statutory functions in relation to police complaints and misconduct.

We must also take into account the likelihood that disclosure would have the effect of deterring individuals from using the report line or co-operating with the IOPC more generally because they fear that they will be identified either directly or indirectly from information disclosed by the IOPC. In our view, this risk would arise even if disclosure resulted in unwarranted speculation about the identity of a source, or misidentification of a source.

The public interest in release:

The disclosure of this information to the level of detail you require would leave the public better informed about the nature of the concerns notified to our report line, the frequency with which they are received and as to the recurrence of any particular type of report in regard to certain police forces. Full compliance with your request may also assist the public in deciding how far the IOPC report line is trusted by police officers and staff as a means of raising concerns in the expectation that they will be taken seriously.

More generally, disclosure of this information would serve the public interest in openness and in accountability for decision making and the use of public funds.

Balance of the public interest under section 30(2)

There is a very substantial public interest in avoiding any disclosure that could have a deterrent effect on the level of cooperation from individuals who supply confidential information to the IOPC. The sensitivity of this information is increased by the likelihood that disclosure would be likely to prejudice specific investigations, as well as to the effectiveness of the IOPC more generally.

Set against this is the public interest in accountability for the IOPC as the “prescribed person” for disclosures regarding the conduct of persons serving with the police and other bodies covered by our regulatory functions.

In our view, the release of the requested information about individual reports would not add significantly to our accountability for the operation of the report line. This is because a more detailed account of each report would give only the perspective of the reporter without the benefit of other information as to the nature of the incident. In contrast to the findings of an investigation, the disclosure of these more specific details outside of their surrounding context would be unlikely to further the public interest in openness and transparency.

The information we are disclosing confirms the number of reports received in each year since 1 January 2015, the police forces and other bodies to which they relate and a summary of the action we have taken during each period. The information we are refusing would appear to us to make only a limited additional contribution to the public’s understanding of how we process these reports. We have decided, therefore, that the public interest in releasing the withheld information is outweighed by the public interest in avoiding harm to the IOPC’s core functions, including specific investigations, and in safeguarding the relationship between the IOPC and confidential sources.

Accordingly, we have concluded that the public interest in maintaining the exemption under section 30(2) outweighs the public interest in disclosure of this information.

Section 40 – personal information

The exemption under section 40(2) applies to “personal data” about someone other than the requester when disclosure would breach any of the data protection principles contained in Article 5 of the General Data Protection Regulation (GDPR). In this case we have considered Article 5(1)(a), which requires that any personal data is processed lawfully, fairly and in a transparent manner in relation to the individuals concerned.

The Data Protection Act 2018 (DPA) defines personal data as any information relating to an identified or identifiable living individual.

Personal data does not only constitute names, addresses and dates of birth but includes any data that may result in the identification of an individual. Therefore, if an individual cannot be directly identified from the information, it may still be possible to identify them. Guidance from the Information Commissioner confirms that in deciding whether someone may be identifiable it is necessary to consider all the means reasonably likely to be used to identify them.

We consider there to be a reasonable likelihood that persons to whom these reports relate would be identifiable from the information we are withholding under your request, especially if someone with sufficient motivation to identify a source was in a position to combine information from each report with other information they can access. Full compliance with your request would therefore engage the GDPR because the information would be likely to result in the indirect identification of persons connected with these reports in a context which “relates” to them in their personal capacity. Accordingly, this information can be disclosed only if this is allowed by the data protection principles.

In this case, the relevant principle is at Article 5(1)(a) of the GDPR, which states: *‘Personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject’*.

To determine whether or not disclosure would be lawful we have, in accordance with the approach recommended by the Information Commissioner, considered whether or not the ‘balance of legitimate interests’ test under Article 6(1)(f) provides a lawful basis for processing. In our view, compliance is not *necessary* to meet any legitimate interest because the same aim can be achieved by less intrusive means. This takes into account the limited extent to which the withheld information would assist the public in considering the effectiveness of the report line and the other ways in which the IOPC demonstrates accountability for its work, for example the publication of extensive information on our web site.

In addition, any legitimate interest served by disclosure could not justify the invasion of privacy and potential distress that would be likely to result. This takes into account the reasonable expectations of the affected persons as to how report line data will be processed, as indicated by the confidential circumstances under which such reports are generally received.

Some of the information you have requested relates to alleged offences. This type of data falls under the definition of “criminal offence data” when it

	<p>involves identifiable persons, meaning that it cannot be disclosed unless at least one of the conditions under Part 3 of Schedule 1 to the DPA would be met. Guidance issued by the Information Commissioner states that criminal offence data can be disclosed under the FOIA only when the individual has provided consent or the disclosure relates to information which has clearly been made public by the individual concerned. It is clear that neither of these conditions applies to the circumstances of your request.</p> <p>We have also noted that the release of this information would not be in accordance with our published '<i>Policy on the naming of police officers and police staff subject to IOPC investigation, appeal assessment or criminal proceedings</i>', which sets out the data protection and other criteria we apply when deciding whether or not to name the subjects of our investigations.</p> <p>In assessing the weight to be afforded to individual privacy it is necessary to recognise that disclosure under FOIA is effectively an unlimited disclosure to the world at large, without conditions, which could lead to unwarranted intrusion resulting in damage or distress. In addition, there is no presumption under the GDPR that openness and transparency should take priority over personal privacy.</p> <p>We conclude that it would be contrary to the rights and freedoms of the persons involved in these reports to identify them at this time. We have decided, therefore, that this information engages section 40(2) of the FOIA because its disclosure would not meet the requirement of lawfulness under Article 5(1)(a).</p>
<p><u>Ref</u> <u>1008344</u> Back to top</p>	<p><u>Complaints about Northamptonshire Police</u></p>
<p><u>Request</u></p>	<p><i>In relation to Northamptonshire Police for the years 2014 to 2019:</i></p> <p><i>Total number of complaints received</i></p> <p><i>How many complaints were upheld</i></p> <p><i>How many complaints were opposed or overturned</i></p> <p><i>How many complaints are presently unresolved</i></p> <p><i>How many complaints were abandoned</i></p>
<p><u>Response</u></p>	<p>Some of the requested information can be accessed by means of the hyperlinks provided. Please note that the IOPC is not obliged</p>

to provide the linked information that answers your request. This is the effect of section 21 of the FOIA which provides an exemption for information reasonably accessible to the applicant without recourse to the general right of access

We would emphasise that the IOPC does not hold comprehensive data about complaints against officers from Northamptonshire Police or any other police force. This is because most complaints about the conduct of police officers are received and decided by the relevant police force, not by the IOPC. Any new complaints sent to the IOPC directly are redirected to the 'Appropriate Authority' who must then decide whether to formally record the complaint in line with the requirements of the Police Reform Act 2002 (PRA). We do not usually evaluate these matters on receipt or track them after they have been referred to the force so do not know whether they are in fact recorded as complaints. Once a matter is recorded, the police force must progress it in accordance with the PRA, which defines the limited circumstances in which the IOPC becomes involved.

The aim of the police complaints system is to ensure that matters are dealt with at the most appropriate level, with only the most serious matters being investigated by the IOPC. This means that the majority of complaints are dealt with by the police, without any IOPC involvement. The IOPC becomes aware of a specific complaint having been made or recorded only when it is brought to our attention under the procedures specified in legislation. Most of the complaints notified to the IOPC for decision are received under the procedures relating to 'reviews' (formerly appeals) or 'referrals'.

The handling of individual complaints by police forces may be subject to formal review by the IOPC in circumstances that are set out in our [Statutory Guidance](#). Please note that the Policing and Crime Act 2017 introduced a number of changes which came into effect on 1 February 2020. Previously, there were different rights of appeal a complainant could exercise, depending on how their complaint was handled by the police. Changes to the legislation replaced these different rights with a single right to apply for a review of the outcome of a complaint. Please see our statutory guidance for further information relating to reviews. Information about the appeals process, which applies to complaints recorded before 1 February 2020, is contained in [the 2015 version of our Statutory Guidance](#).

Under the PRA, police forces are required to refer certain incidents to the IOPC where they meet specified criteria. A referral can originate from a complaint by a member of the public, recordable conduct matter, or death or serious injury (DSI) matter. All DSI matters and certain categories of complaint and conduct matter must always be referred to the IOPC. On receipt of a referral our role is to decide whether or not the matter should be investigated, and if so the mode of that investigation, which may be local (i.e. carried out by the police alone), or investigated by the IOPC. For more information about the referral process, including the different 'triggers' for a referral to the IOPC, please see Chapter 9 of our [Statutory Guidance](#).

We publish information including investigation reports and summaries in relation to the progress and outcomes of most IOPC investigations. Many of these investigations originate from conduct or DSI matters and so do not involve public complaints. Information about our investigations concerning Northamptonshire Police can be accessed using the search tool under 'Further information' on [this page of our web site](#). Using the filters provided, you can narrow the search by force, theme (for example 'corruption and abuse of power') and time period. Our web site content from before 2018 can be searched by means of the same search filters on [the archived version of our web site](#) published by the National Archive.

The IOPC's [annual complaint statistics and quarterly force performance data](#) contain data about the number and type of complaints being recorded by each police force and how they were subsequently dealt with. These reports are based on complaints data we collect from police forces. They include the total number of complaints recorded by each police force, and a breakdown of how these complaints have been handled, including the number they have investigated.

Our most recent annual statistical report relates to the year to 31 March 2019 and we anticipate publishing our report for 2019/20 later this year. Our reports for 2014/15 and 15/16 are available on our [National Archives site](#). Our latest [performance bulletin for Northamptonshire Police](#) covers the first three quarters of 2019.

Our response to your request is as follows.

Number of complaints received

Forces do not report to the IOPC on the number of complaints they receive but do report on the complaint cases they record. The Appropriate Authority is under a duty to record the complaint only where it meets the definition set out in legislation. Data table 4 on pages 24 and 25 of our [2018/19 annual statistical report](#) shows the number of complaints recorded by each force in the years 2014/15 to 2018/19.

The exemption from disclosure under section 21 of the FOIA applies to this information for the reasons given above.

How many complaints were upheld?

The IOPC collects complaints data from police forces including data about the types of complaints made. A complaint case will contain one or more allegations.

Complaint cases are not finalised as 'Upheld or 'Not Upheld'. This is because each allegation within the complaint case can be finalised by different means, so that one allegation within a single complaint case may be upheld whilst another may not. Only when a complaint is investigated will a decision be made and recorded as to whether or not an allegation has been upheld. The majority of complaints are not finalised by means of an investigation, as confirmed by our published data.

Our [annual complaint statistics and quarterly force performance data](#) include data tables as to the nature of allegations finalised by means of an investigation and as to the number of these allegations upheld or not upheld.

A Court of Appeal judgement issued in October 2014 ruled that only investigated allegations which were *not* subject to 'special requirements' could be finalised as either 'upheld' or 'not upheld'. Changes to police force systems to enable the outcomes of allegations to be recorded in line with the judgement were delayed. As a result, investigation outcomes figures published in the [2014/15 Police complaints statistics for England and Wales](#) did not reflect the judgement and the IOPC was unable to collect or report this information until 2018/19.

The data tables in the Annex below consist of the data you have

requested for 2014/15, 2018/19 and for quarters one to three of 2019/20. Please note that, as a consequence of the legal judgment, the figures for 2014/15 are not directly comparable to the figures for 2018/19 and 2019/20.

Please refer to the Glossary in our statistical reports for the definitions of the terms used in respect of our published data, including 'complaint case', 'allegation', 'investigation' and 'special requirements'.

How many complaints were opposed or overturned?

How many complaints were abandoned?

Under the legislation, there are five different procedures for finalising an allegation or complaint case:

- Local resolution
- Investigation
- Withdrawn
- Disapplication
- Discontinuance

The legislation does not allow for a complaint to be "opposed", "overturned" or "abandoned" and, therefore, this information is not recorded or reported with the result that it is not held by the IOPC.

You may find it helpful to see our published data relating to the means by which allegations are finalised (for example, table 8 on page 29 of the 2018/19 report). This is separated by police force.

How many complaints are presently unresolved?

The IOPC holds data about the number of *allegations* recorded in a particular year that had yet to be finalised at the end of that year. This data can be provided if required.

We do not hold data as to the number allegations "presently" unresolved because we do not receive data that would enable us to track the progress of an allegation beyond the year in which it was recorded and, therefore, we do not hold the information under this part of your request.

Annex

1. Allegations upheld - summary

Financial year	Quarter	Number of complaints recorded	Number of allegations upheld	% allegations upheld
2014/15	Q1	114	32	19%
	Q2	107	29	17%
	Q3	124	25	16%
	Q4	89	20	13%
2015/16	Q1	116	-	-
	Q2	161	-	-
	Q3	102	-	-
	Q4	94	-	-
2016/17	Q1	116	-	-
	Q2	125	-	-
	Q3	143	-	-
	Q4	125	-	-
2017/18	Q1	123	-	-
	Q2	144	-	-
	Q3	100	-	-
	Q4	116	-	-
2018/19	Q1	115	9	13%
	Q2	107	8	15%
	Q3	125	11	22%
	Q4	118	12	24%
2019/20	Q1	105	13	12%
	Q2	114	3	14%
	Q3	122	10	18%

2. Allegations Upheld – detail

2014/15	Full year	Q1	Q2	Q3	Q4
# allegations finalised	924	217	229	244	234
# allegations finalised by investigation	646	170	168	159	149
# upheld	106	32	29	25	20
% upheld	16%	19%	17%	16%	13%
2018/19	Full year	Q1	Q2	Q3	Q4
# allegations finalised	949	246	220	228	255
# allegations finalised by investigation	296	87	64	68	77
of which not special requirements	227	71	55	50	51
# upheld	40	9	8	11	12
% upheld	18%	13%	15%	22%	24%
2019/20	Q1	Q2	Q3		
# allegations finalised	269	169	210		
# allegations finalised by investigation	120	30	70		
of which not special requirements	113	21	56		
# upheld	13	3	10		
% upheld	12%	14%	18%		