

Guidance on the recording of complaints under the Police Reform Act 2002

1. Introduction

- 1.1 The police have a duty to record complaints made by members of the public about the conduct of a person serving with the police and about the direction and control of a police force. The accurate and consistent recording of complaints plays a part in ensuring public confidence in the police complaints system. It also contributes to a sound evidence base to inform development of future policy and practice at local and national levels.
- 1.2 This document provides guidance for recording complaints and definitions for a range of terms used in relation to police complaints. It applies to all complaints as defined under the Police Reform Act 2002, as amended by the Police Reform and Social Responsibility Act 2011, and has been developed in consultation with force professional standards departments.
- 1.3 The local policing body¹ is the appropriate authority² for complaints involving the chief officer and has a duty to inform the relevant police force of the details of these complaints. Forces are required to record details of these complaints on professional standards department databases.
- 1.4 Forces are required to provide data relating to complaints recorded on their professional standards department databases, at a frequency stipulated by the IOPC. The guidance in this document is also relevant to the rules applied by the IOPC when presenting this data to the public. More information on how the IOPC analyses and presents this information can be found on the IOPC website at www.policeconduct.gov.uk.

¹ 'Local policing body' is a collective term that refers to Police and Crime Commissioners, the Mayor's Office for Policing and Crime (for the Metropolitan Police Service), and the Common Council (for the City of London Police).

² The 'appropriate authority' refers to: for a chief officer, the local policing body for the police force of which the officer is a member; and in any other case, the chief officer with direction and control over the person serving with the police.

1.5 This document is intended as guidance for the recording of complaints on professional standards department databases only, not as guidance for the handling of police complaints generally. The IOPC Statutory Guidance provides a framework for the handling of police complaints and is available on the IOPC website. Reference to the relevant sections of the Statutory Guidance is made throughout this document.

2. Recording a complaint case

- 2.1 A police complaint is an expression of dissatisfaction by a member of the public with the service they have received from a police force. It may be about the conduct of one or more persons serving with the police and/or about the direction and control of a police force.
- 2.2 A complaint case will be recorded for each incident or series of linked incidents where an allegation about conduct and/or direction and control is made by one or more complainants.
- 2.3 The police force should still record a complaint case even if actions to resolve the complaint are 'suspended' to prevent the prejudice of any criminal investigations or proceedings.

Date complaint case received: is the date when a complainant or his or her representative first contacts the appropriate authority to make an allegation. Contact may be on a face-to-face basis or involve a telephone call, email, fax or letter. If a complaint is forwarded to the appropriate authority by the IOPC, the complaint case received date is the date the complaint is received by the appropriate authority.

If time is needed to decide if an allegation concerns the conduct of a person serving with the police, the 'date complaint case received' should still be the date when the complainant or his or her representative first contacted the appropriate authority about the matter (or the date the complaint was received from the IOPC).

Date complaint case recorded: is the date when the first allegation in a case is recorded onto a professional standards department database. The holding of a complaint in any other format, such as in an email, does not constitute recording. The IOPC expects the appropriate authority to record a complaint within ten working days from receipt of the complaint (ref. Section 3 of the IOPC Statutory Guidance). 'Working days' are defined as excluding weekends and bank holidays.

Date recording decision notified: is the date when the complainant is informed, in writing, of the recording decision. The IOPC expects communication of the recording decision to the complainant or his or her representative for all complaint cases within 15 working days from the date the complaint case is first received by the appropriate authority (ref. Section 3 of the IOPC Statutory Guidance). 'Working days' are defined as excluding weekends and bank holidays.

Date complaint case finalised: is the date at which all action relating to a complaint case has been concluded. This includes:

- time during which an appeal could be lodged and, where an appeal is made, the time to deal with it
- time for any misconduct and/or criminal proceedings to be concluded and the complainant or his or her representative to be informed of the outcome, including any associated appeals concerning the outcome of the misconduct and/or criminal proceedings
- time for any initial outcome of unsatisfactory performance procedures (UPP)³ to be determined and communicated to the complainant or his or her representative.

3. Recording allegations

- 3.1 An allegation may concern the conduct of a person serving with the police or the direction and control of a police force. It is made by someone defined as a complainant under the Police Reform Act 2002 (see section 4 below). An allegation may be made by one or more complainants about the conduct of one or more people serving with the police. One or more linked allegations may be contained within one complaint case.
- 3.2 The following rules should be applied when recording allegations on a complaint case:
 - where the person being complained about is not known, the allegation will still be recorded with an unknown 'person subject to the complaint'
 - an allegation will be recorded against an allegation category the list of available categories, along with definitions and examples, can be found in table 1 (for police misconduct) and table 2 (for direction and control matters) at the end of this document.
- 3.3 It is important that an allegation is classified correctly as either conduct or direction and control as there is an important distinction between them in relation to the appeal rights available. Where it is not clear if an allegation is about conduct or direction and control, the IOPC expects the matter <u>not</u> to be treated as direction and control. More information about how to differentiate between conduct and direction and control can be found in section 3 of the IOPC Statutory Guidance.

Date allegation received: is the date when a complainant or his or her representative first contacts the appropriate authority to make an allegation. There can be a number of allegations attached to a complaint case and these may be made over a period of time. The date of the first allegation received will always be the same as 'date complaint case received'. Subsequent allegations may be made at a later date.

Date allegation recorded: is the date that an allegation is recorded onto a database in a professional standards department. Several allegations can be recorded on a complaint case; only the date of the first allegation recorded has to be synonymous with the date complaint case recorded. The holding of an allegation in any other format, such as email, does not constitute recording.

Date allegation finalised: is the date the complainant or his or her representative is informed, in writing, by the appropriate authority of the result of the allegation (see section 6 of this guidance). This should also notify the complainant of any planned action by the appropriate authority; for example, to deal with misconduct, unsatisfactory performance, disciplinary action (police staff) or learning outcomes (individual or organisational). It does not include any time during which a complainant may make an appeal.

4. Recording complainants on a complaint case

- 4.1 Section 3 of the IOPC Statutory Guidance defines who can make a complaint under the Police Reform Act 2002:
 - a member of the public who claims to be the person in relation to whom the conduct took place
 - a member of the public who claims to have been adversely affected by the conduct complained of
 - a member of the public who claims to have witnessed the conduct complained of
 - a member of the public acting on the behalf of someone falling into one of the above categories.

The above definition applies to both complaints about conduct and those about direction and control.

- 4.2 The following rules should be applied when recording complainants on a complaint case:
 - where more than one complainant makes the same allegation about the same incident, all of the complainants will be recorded against the same complaint case. A complaint case should not be created for each person making an allegation about the same incident or series of linked incidents, although each complainant will receive the right of appeal where there is
 - each complaint case will have at least one complainant recorded against it

- a complainant is recorded once, irrespective of how many allegations on the complaint case they have made
- where available, the police force will be expected to record demographic information about the complainant.

5. Recording the person subject to the complaint

- 5.1 The 'legal definitions' section in the IOPC Statutory Guidance (section 15) defines a person serving with the police as:
 - a member of a police force
 - a member of police staff
 - an employee of the Common Council for London who is under the direction and control of a chief officer
 - a special constable who is under the direction and control of a chief officer.
- 5.2 A complaint can be made against one or more persons serving with the police. All persons subject to the complaint must be recorded on the complaint case and linked to each of the allegations made against them.
- 5.3 The following rules should be applied:
 - a person subject to complaint should not be recorded for a direction and control allegation as these complaints should not concern the conduct of an individual
 - if the details of the person complained about are not known they should be recorded as an 'unknown' person
 - where known, the role and rank of the person subject to the complaint will be recorded
 - where possible, the police force will be expected to record demographic information about the person subject to the complaint.

6. Recording the allegation result

- 6.1 Section 3 of the IOPC Statutory Guidance explains the different ways for handling complaints. Where there is more than one allegation on a complaint case, each allegation may be handled in a different way.
- The allegation result is the means by which the allegation has been dealt with: through local resolution, investigation, disapplication, discontinuance, or withdrawal. An allegation result should be recorded for each allegation and should indicate whether the allegation was dealt with by the professional standards department (or local policing body), or by a local manager at division.

6.3 Local resolution

6.3.1 Local resolution is a way of dealing with a complaint by solving, explaining, clearing up, or settling the matter directly with the complainant. More

- information about local resolution and when it can be used is set out in section 5 of the IOPC Statutory Guidance.
- 6.3.2 'Local resolution' should be recorded as the allegation result for any allegations that are dealt with in this way. The date the local resolution is completed should also be recorded.

6.4 Investigation

- 6.4.1 An investigation into a complaint will fall into one of four types: local, supervised, managed, or independent. The investigation type should be recorded. Information and guidance in relation to investigations under the Police Reform Act 2002 can be found in section 9 of the IOPC Statutory Guidance.
- 6.4.2 In certain circumstances, an investigation into a complaint will be certified as one subject to special requirements. Whether special requirements apply or not determines the allegation results available. Section 9 of the IOPC Statutory Guidance provides information about when special requirements apply.
- 6.4.3 If an investigation <u>is</u> subject to special requirements: the allegation result cannot be recorded as 'upheld' or 'not upheld'. The date the investigation is completed should be recorded.
- 6.4.4 If an investigation is <u>not</u> subject to special requirements: allegations should have an allegation result of either 'upheld' or 'not upheld' recorded³. The date the investigation is completed should also be recorded.
- 6.4.5 A complaint should be upheld where the findings of the investigation (not subject to special requirements) show that the service provided to the complainant did not reach the standard that a reasonable person could expect. More information about when a complaint can and should be upheld can be found in section 11 of the IOPC Statutory Guidance.

Date local resolution/investigation started: where the local resolution/investigation is dealing with a number of allegations, this is the date the first of these allegations was received. If the local resolution/investigation is dealing with a single allegation, this is synonymous with the date the allegation was received.

³ The allegation results of 'upheld' and 'not upheld' apply to allegations linked to complaint cases received on or after 1 April 2010 and which are finalised by an investigation that is <u>not</u> subject to special requirements. Allegations linked to complaint cases received prior to this date and finalised by investigation should have an allegation result of 'substantiated' or 'unsubstantiated'.

Date local resolution/investigation completed: is the date the complainant or his or her representative is informed, in writing, by the appropriate authority of the outcome of the allegation(s) handled by the local resolution/investigation and any planned action to deal with misconduct, unsatisfactory performance, disciplinary action (police staff) or learning outcomes (individual or organisational). It does not include any period during which a complainant may make an appeal. If the local resolution/investigation dealt with a single allegation this is synonymous with the date the allegation was finalised.

6.5 Disapplication

- 6.5.1 Once a complaint has been recorded under the Police Reform Act 2002, the appropriate authority may decide that disapplication of the requirements of Schedule 3 (the handling of complaints) under the Act is appropriate. Disapplications may be carried out by the appropriate authority or, if certain circumstances apply, the appropriate authority has to submit an application to disapply for consideration by the IOPC. Section 4 of the IOPC Statutory Guidance sets out the requirements for disapplications and the grounds that have to be met for disapplication to occur.
- 6.5.2 Allegations that are disapplied should have an allegation result of 'disapplication' recorded.
- 6.5.3 For disapplications carried out by the appropriate authority, the following information should also be recorded: the date the disapplication applies.
- 6.5.4 For disapplications sent to the IOPC for consideration, the following information should also be recorded:
 - the date the application to disapply is sent to the IOPC
 - the date the appropriate authority is notified of the IOPC's decision
 - the decision made by the IOPC.

6.6 Discontinuance

- 6.6.1 A discontinuance ends an ongoing investigation into a complaint, conduct matter, or DSI (death and serious injury) matter. A discontinuance of a complaint may be carried out by the appropriate authority or, if certain circumstances apply, the appropriate authority has to submit an application for discontinuance for consideration by the IOPC. Section 10 of the IOPC Statutory Guidance sets out the requirements for discontinuances and the grounds that have to be met for an investigation to be discontinued.
- 6.6.2 Allegations that are discontinued should have an allegation result of 'discontinuance' recorded.
- 6.6.3 For investigations discontinued by the appropriate authority, the following information should also be recorded: the date the discontinuance applies.

- 6.6.4 For applications for discontinuance sent to the IOPC for consideration, the following information should also be recorded:
 - the date the application is sent to the IOPC
 - the date the appropriate authority is notified of the IOPC's decision
 - the decision made by the IOPC.

Date disapplication/discontinuance completed: is the date the complainant or his or her representative is informed, in writing, by the appropriate authority that their complaint or one or more of the allegations within their complaint will be disapplied/discontinued. It does not include any time during which a complainant may make an appeal. This is also the allegation finalised date where the allegation result is disapplied/discontinued.

Date disapplication/discontinuance application sent to the IOPC: is the date the appropriate authority applies in writing to the IOPC to disapply one or more allegations on a complaint case, or to discontinue an investigation.

Date decision for the disapplication/discontinuance received from IOPC: is the date the IOPC informs the appropriate authority, in writing, of their decision to grant or refuse permission for the disapplication/ discontinuance.

6.7 Withdrawn

- 6.7.1 A complainant may decide to withdraw their complaint or allegation, or that they wish no further action to be taken in relation to their complaint/allegation. If written notification to that effect is received from a complainant or his or her representative, the force should record the withdrawal or the fact that the complainant does not wish further steps to be taken.
- 6.7.2 Allegations that are withdrawn should have an allegation result of 'withdrawn'. The relevant date for allegations withdrawn is 'date allegation finalised' (refer to section 3 above for the definition of this date).

7. Recording appeals

- 7.1 Under the Police Reform Act 2002, a complainant has a right to appeal against certain decisions or outcomes in relation to their complaint. The responsibility for considering and determining appeals is shared between the IOPC and the chief officers of police forces. More information about the handling of appeals, including the criteria for determining whether an appeal should be considered by the chief officer for the force or the IOPC, can be found in section 13 of the IOPC Statutory Guidance.
- 7.2 For all appeals the following information should be recorded:

- the appeal type (non-recording, local resolution, investigation, decision to disapply, the outcome of a complaint that has been the subject of a disapplication, decision to discontinue)
- the body handling the appeal (chief officer or IOPC)
- the appeal decision and any further outcomes (see section 8).

Date appeal received: is the date that the appeal is received by the chief officer or IOPC. Where the appeal has been sent to the wrong appeals body, the time it takes for the appeal to be forwarded to the correct appeals body will not be taken into account for the purposes of the 28 day period in which a complainant may make an appeal (ref. section 13 of the IOPC Statutory Guidance). The date appeal received is the date the appeal is first received, regardless of where it has been received. For example, if an appeal is received by the IOPC on 25 January, forwarded to the chief officer of the force as the relevant appeal body on 27 January, and received by the force on 28 January, the 'date appeal received' is 25 January.

Date appeal completed: is the date that the complainant or his or her representative is notified, in writing, of the appeal decision (including any action to be taken) by the chief officer or the IOPC.

8. Recording complaint outcomes

- 8.1 Once an allegation is finalised, it may lead to further outcomes, for example, action to be taken against the person subject to complaint. This information should be communicated to the complainant and recorded on professional standards department databases, and includes:
 - management action for a person subject to complaint following the local resolution or investigation of an allegation, outside of any misconduct proceedings
 - that a person subject to complaint will be subject to misconduct proceedings, their attendance at a meeting or hearing, the outcome of those proceedings and any subsequent appeal activity including the appeal outcome
 - the decision to refer a case to the Crown Prosecution Service (CPS) and the CPS decision
 - where the decision is to prosecute a person(s) subject to complaint, the charge, verdict, and disposal for each individual
 - any instance where a person subject to complaint is referred to unsatisfactory performance procedures (UPP) and the initial UPP outcome (refer to note on page 3 for information about what the 'initial UPP outcome' is). This can be in addition to any misconduct or criminal proceedings
 - where there is a case to answer for a person subject to complaint but no further action is necessary
 - if a person subject to complaint is suspended, retires, or resigns during the complaints process.

The above list is not exhaustive.

9. Definitions of allegation categories for recording allegations about police conduct and direction and control

9.1 Allegations about police conduct

- 9.1.1 The definitions in table 1 have been provided to assist those recording allegations about police conduct linked to complaint cases. Please note that any examples given in this section are simply a guide; they are not exhaustive.
- 9.1.2 Where relevant, a link to the appropriate Standard of Professional Behaviour is included for police officers; these links are simply a guide. The links should be regarded as broadly indicative of the categories in the Standards of Professional Behaviour as agreed for staff in forces that are members of the Police Staff Council.

9.2 Allegations about direction and control

9.2.1 The definitions and examples in table 2 have been provided to assist those recording allegations of direction and control linked to complaint cases. The information provided reflects that presented in the IOPC Statutory Guidance (section 3) to assist forces to differentiate between direction and control and conduct complaints, and is intended as a guide only.

Table 1. Allegation categories for police misconduct

Category	Allegation name	Definition	Standard(s) of Professional
			Behaviour
Α	Serious non- sexual assault	Inclusion in this category depends solely on the nature of the injuries.	Use of force
		This includes Section 18 or 20 assaults contrary to the Offences Against the Person Act 1861, i.e. unlawfully or maliciously wounding or causing grievous bodily harm and homicide.	
		Examples are: injury resulting in permanent disability or permanent loss of sensory function, fracture, deep cut or deep laceration, and injury causing damage to an internal organ or the impairment of any bodily function.	
		2. This includes Section 47 assaults, Offences Against the Person Act 1861.	
		Examples are: loss or breaking of a tooth or teeth, temporary loss of sensory functions (which may include loss of consciousness), extensive or multiple bruising, displaced broken nose, minor fractures, minor (but not merely superficial) cuts of a sort probably requiring medical attention (e.g. stitches), and psychiatric injury that is more than fear, distress, or panic.	
В	Sexual assault	This concerns rape, attempted rape, and any assault surrounding or involving circumstances of indecency. This category relates to sexual matters only.	Use of force
С	Other assault	This concerns use of more force than is reasonable. Inclusion is solely dependent on the nature of the injuries. This includes common assault and battery. Injuries include: grazes, scratches, abrasions, minor bruising, swellings, reddening of the skin, superficial cuts, and a 'black eye'. This category includes minor injuries	Use of force

Category	Allegation name	Definition	Standard(s) of Professional Behaviour
		resulting from the use of handcuffs. It also includes minor assaults resulting in no injury, such as pushing. A person serving with the police must never knowingly use more force than is reasonable, nor should he or she abuse his or her authority. This category includes any unjustified use of force or personal violence (but not assaults that cause no injury arising from unlawful arrest) and any incident involving police dogs or horses where the incident is attributable to the conduct of the person in control, unless the severity of injury puts them into category A, above.	
D	Oppressive conduct or harassment	This includes unjustified interference, questioning or surveillance, for example, an improper request for driving documents. It may include allegations concerning unjustifiable examples of routine traffic checks, persistent police presence, or persistently following. Allegations here do not relate to police detention or police interviews under PACE.	Authority, respect, and courtesy Equality and diversity Use of force
E	Unlawful/ unnecessary arrest or detention	This concerns unlawful/unnecessary arrest or detention under Section 24 PACE (power of arrest without warrant) in respect of proportionality, reasonableness, and necessity. 'Unlawful' should be interpreted as the officer having insufficient powers to make an arrest or to detain in the circumstances.	Authority, respect, and courtesy. Equality and diversity Use of force
F	Discriminatory behaviour Sub-categories F1 Race F2 Disability F3 Gender F4 Sexual orientation F5 Religion and belief F6 Age	This includes any allegation that involves an element of discrimination or is perceived to do so at any stage. Discrimination should be thought of in terms of treating people differently without justification through prejudice or unfair treatment of one person or group. Discrimination may be committed on the grounds of race, disability, gender, religion and belief, sexual orientation, or age. The specific grounds of discrimination should be identified and recorded for each allegation. When recording an allegation in this category,	Equality and diversity

Category	Allegation name	Definition	Standard(s) of Professional Behaviour
		it is expected that a sub-category will be selected. If there are associated allegations (e.g. incivility or assault) these should be recorded separately. In addition, discriminatory behaviour may be identified by anyone receiving, recording, or investigating a complaint.	
G	Irregularity in relation to evidence/perjury	This includes perjury or allegations of falsehood. For example, allegations that an officer perjured him/herself at trial, made a false statement or induced witnesses to give evidence falsely. Also includes allegations against officers responsible for disclosure and allegations of evidence being destroyed. Allegations may include taking evidence from witnesses but should not relate to breaches of PACE Codes of Practice.	Honesty and integrity
Н	Corruption or malpractice	This includes allegations of corruption or malpractice. Corruption is the abuse of a role or position held, for personal gain or gain for others. This ranges from serious corruption (e.g. any attempt to pervert the course of justice) to the less serious (e.g. misuse of warrant card). This includes tampering with evidence, allegations of theft (where linked to an abuse of position, such as an allegation of theft during an authorised search of a property), and allegations of inducements if complaints are dropped.	Honesty and integrity
J	Mishandling of property	This includes all allegations relating to the mishandling of property. Reasonable care must be exercised in order to prevent loss or damage to property (excluding an officer's own personal property but including police property). A breach of this category includes: the loss of property including money, unreasonable retention of property, damage to property in police custody, failure to account for money or property, and improper disposal of property, but excludes those from Breach of Code B PACE (Category L) and property record-keeping in Code C	Honesty and integrity Duties and responsibilities

Category	Allegation name	Definition	Standard(s) of Professional Behaviour
		PACE (Category M).	
К	Breach of Code A PACE on stop and search	This includes unjustified use of the relevant power, particularly where reasonable suspicion cannot be supported, and failure to act appropriately before or during a search, or to make the necessary record where practicable. Similar allegations from non-PACE stops and searches should also be recorded in this category (e.g. Section 44 Terrorism Act 2000 and Section 60 Criminal Justice and Public Order Act 1994). If there are associated allegations (e.g. incivility or assault) these should be recorded separately.	Orders and instructions Duties and responsibilities
L	Breach of Code B PACE on searching of premises and seizure of property	This includes unauthorised entry on search, failure to provide information to the occupier, an improper or excessive search, failure to record searches properly, not securing premises where necessary, and breaches of rules on seizure or retention. This will include property seized and retained under this power.	Orders and instructions Duties and responsibilities
M	Breach of Code C PACE on detention, treatment and questioning	This includes failure to inform detained persons of their rights and entitlements, unjustified obstruction of access to legal advice, holding persons incommunicado, not providing necessary support/advice to young/vulnerable detained persons, failure to maintain proper custody/property records, not providing mandatory physical conditions whenever practicable, not carrying out searches on detained people in accordance with the code, conducting review of detention improperly or at inappropriate intervals, failure to caution or charge when required, interviewing oppressively or in inappropriate circumstances, not making proper records of interviews nor allowing them to be checked by suspects where practicable, and not providing interpreters where necessary.	Orders and instructions Duties and responsibilities
N	Breach of Code D PACE on identification procedures	This includes failure to provide suspects with information about identification procedures or offer them a choice between procedures where	Orders and instructions Duties and

Category	Allegation name	Definition	Standard(s) of Professional Behaviour
		appropriate, not conducting or recording identification procedures properly, not obtaining necessary consent to the taking of fingerprints, photographs or body samples, and not providing suspects with the opportunity to witness destruction of fingerprints or photographs where appropriate.	responsibilities
Р	Breach of Code E PACE on tape recording	This includes failure to tape record (without good reason), failure to handle tapes openly and in front of the suspect or to maintain adequate tape security, and not making a proper record of objections, complaints, breaks, etc.	Orders and instructions Duties and responsibilities
Q	Lack of fairness and impartiality	An example of this would be a failure to treat all parties equally where there are allegations and counter-allegations. This category should not include allegations arising from any breach of PACE (categories K to P and R) or those related to 'discriminatory behaviour'.	Equality and diversity
R	Unspecified breaches of PACE which cannot be allocated to a specific code	We would expect this category to be used very rarely. It should not be used in relation to multiple allegations of breaches of PACE. This category may initially be used where unspecific allegations are made but should be revisited as the case is investigated and specific issues are identified.	Orders and instructions Duties and responsibilities
S	Other neglect or failure in duty	This includes allegations with regard to a lack of conscientiousness and diligence concerning the performance of duties. This may include failure to record or investigate matters and keep interested parties informed. It includes failure to comply with orders, instructions, or force policy.	Orders and instructions Duties and responsibilities Fitness for duty
Т	Other irregularity in procedure	This includes other procedural irregularities not falling within category S. This would include misleading a member of the public in order to achieve a course of action. This also includes allegations about bail periods or fixed penalty notices being wrongly applied.	Orders and instructions Duties and Responsibilities
U	Incivility, Impoliteness	This includes allegations of abusive, offensive or rude language or	Authority, respect and courtesy

Category	Allegation name	Definition	Standard(s) of Professional Behaviour
	and intolerance	behaviour. It does not include harassment (see category D). If there are associated allegations (e.g. 'discriminatory behaviour') then these should be recorded separately.	
V	Traffic Irregularity	This includes allegations only about the driving or use of vehicles in connection with police business. It does NOT relate to officers speaking to members of the public in relation to traffic offences.	Orders and instructions Discreditable conduct
W	Other	This includes any allegations that do not fall into any of the other categories. This category should not be used as a 'catch all' but should be revisited as the case is investigated and specific issues are identified.	All or any
X	Improper access and/or disclosure of information	This concerns allegations relating to improper disclosure or use of information held for police purposes. This includes misuse of police computer systems, accessing information for personal reasons, requests for information made by family or friends, approaches by private investigators, and unauthorised disclosure to the media and to members of the public.	Orders and instructions Confidentiality
Y	Other sexual conduct	This includes allegations of sexual conduct not amounting to sexual assault and including sexual harassment or soliciting of prostitutes, including allegations of paedophilia (including child pornography).	Discreditable conduct

Table 2. Allegation categories for direction and control

Category	Definition/examples
Operational policing policies	Their drafting and the process leading to their approval.
Organisational decisions	Examples:
	where officers and staff should be located
	how officers and staff should be managed
General policing standards	As applicable to the force in question.
Operational management	Examples:
decisions	force-wide crime initiatives
	 general strategic decisions about how certain police powers should be exercised (where no individual officer discretion applies).