

Responding to the College of Policing's Guidance on Stop and Search

College of Policing guidance

Updated [guidance](#) was published by the College of Policing in July 2020 which stated that members of the public most affected by stop and search should be encouraged to sit on panels scrutinising its use. Members should be fully supported with training on the law, complaints processes and data interpretation.

The updated guidance suggested that police forces across England and Wales should map areas where stop and search is most frequently used and ask people in those communities to scrutinise police use of the power.

The college of policing note that panels should be given access to stop and search records as well as additional information relating to stop and search, such as body-worn video footage, training materials, complaints and statistics.

The guidance also suggests that police forces should also be prepared to make adaptations to ensure representation, such as changing the time and location of meetings to make them easier to attend, and consider alternatives to formal meetings, if that will encourage greater attendance.

Hertfordshire Stop & Search panel – current situation

In relation to the new college of policing guidance the Hertfordshire stop & search panel are already implementing a number of the recommendations:

1. Adaptations to ensure representation - The panel already meet at differing times of the day, including evenings and at various locations across the county. The pandemic has seen the meetings move to remote meetings which has made the meetings more accessible to some. Consideration will be given to continue to use technology to enable remote access post pandemic. This may see the implementation of some 'hybrid' meetings.

2. Access to stop and search records, body-worn video footage, training materials, complaints and statistics – The panel currently receive all of these types of information. Statistics are reviewed in the monthly meetings and trends or anomalies identified and questions raised. Complaints are reviewed twice a year with the Chief Inspector of the Professional Standards Department invited to join the meeting for that discussion. The panel have sight of closed PSD complaints regarding stop & search and dissatisfactions from the OPCC Complaints Resolution Team (CRT) stop & search records and body worn video footage are discussed in more detail below.

3. Members of the public most affected by stop and search should be encouraged to sit on panels scrutinising its use – Recruitment has continued to take place over the past two years and the make-up of the panel is currently:

Ethnicity	CSP Representation	Age
8 White British	7 Welwyn Hatfield: (over represented due to university student population)	Under 35: 5
4 Black British	4 Broxbourne	36 - 45: 4
3 Black African	4 East Herts	46 – 60: 4
2 Asian	3 St Albans	Over 60: 6
1 White European	1 Watford	
1 Prefer not to say	1 Hertsmere	

Whilst the panel have made strides to ensure they are more representative of the Hertfordshire population in terms of age and ethnicity, a gap remains with regards to how representative they are of individuals who are most affected by stop and search.

It is worth noting that Hertfordshire Constabulary have recently set up a support & challenge panel. The panel (made up of members of the public involved in other scrutiny work) look at topics such as racial disparity where independent challenge is helpful. There will probably be elements of stop & search such as body worn video or ethnicity that are also covered and this support & challenge panel. There will need to be consideration given to how the two groups interact. This may be covered through the Chair of the stop & search panel sitting on the support & challenge panel.

Areas where enhancements could be made?

1. Body worn video footage

Due to the pandemic, meetings have been held virtually. The panel have therefore been unable to view any body worn video (BWV) footage since February 2019. As soon as it is possible for the panel to meet face to face body worn footage will be prioritised and there are plans to have some sessions where a deep dive is undertaken with a larger number of BWV viewed compared to previously.

In the 2019/20 annual report it was noted that due to the amount that the panel are trying to fit in to their meetings they are normally only able to view about 10 pieces of body worn video footage a year. This is not enough to identify any trends and is only able to provide some basic feedback rather than learnings. One consideration which should now be reviewed was to arrange additional scrutiny sessions or a separate BWV panel to enable more footage to be viewed. There has been continued recruitment to the panel over the past 12 months and there are now 19 panel members. This increased number could enable the panel to review more body worn video footage if they were to split in to small groups (as they do for dip sampling records) and each group review two or three different pieces of BWV footage. Previously the panel have watched the videos as one big group however this approach could enable them to view ten pieces of BWV in a meeting rather than two.

The other option would be for a standalone panel that meets monthly or bi-monthly or could see an additional hour added to the end of the regular panel meetings. Those on the panel who are interested could stay on and other members could join specifically for the BWV section. This focus would enable clear trends and feedback to be identified.

The recommendation from the OPCC is to have a separate BWV panel which would be open to other representatives as well as those from the stop & search panel. The additional resource would need to be considered as it can be timely to prepare each piece of BWV footage ahead of the panel meetings.

2. Mapping the hotspots for stop & search and asking communities in those areas where it is more prevalent to apply additional scrutiny

The CSPs that consistently see the most stop & searches being undertaken are St. Albans, Stevenage and Watford. Since 1st March 2020 all these areas have seen over 1000 stop and searches undertaken.¹ Of these areas Stevenage and Watford also stand out as having low arrest and positive disposal rates (Stevenage average arrest rate 8.6%, positive disposal rate 18.0%; Watford average arrest rate 7.7%, positive disposal rate 19.4%). The greater number of stop & searches undertaken in these CSPs isn't leading to positive outcomes and further scrutiny may be necessary to ensure confidence that there are grounds for all these stops. Further analysis could also look at temporal mapping to understand the time of day that the majority of stop & searches are occurring along with the breakdown of group/individual searches.

The stop & search panel have been reviewing this data and identified that they would like to focus in more on the areas where a larger number of stop & searches are taking place.

Opportunities to provide additional scrutiny in hot spot areas could be through:

- RAG meetings – currently some top line countywide data is shared in the monthly RAG briefings
- Local community groups
- Public meetings in hot spot areas
- A stop & search panel being set up in each CSP to focus in more detail on each area

When considering 'hotspot' areas it would be desirable to identify those areas to a more granular level rather than at CSP level. For example, are most the stop & searches taking place in parks, high streets, shopping centres or residential areas. A heat map of stop & searches in each CSPs would be an effective of exploring this data. This would require additional analytical support in order to provide this level of geographical detail.

All the above would require considerable administrative time and resource.

3. Members of the public most affected by stop and search should be encouraged to sit on panels scrutinising its use

We know that young people and those from a BAME background are over represented in stop and search compared to the population breakdown. Proportionality is a topic that all areas across the country are struggling to understand and it is still being worked through.

Records in January 2020 and November 2019 were reviewed to understand the age breakdown of those who were stopped and searched². In January 2020 there were 647 stops of which 417 (64%) were 25 years or under. 12% of stops were on individuals over 36 years and there were only 2 stops on individuals over 60 years. Similar percentages were seen in November 2019 where there were 774 stops of which 504 (65%) were 25 years of under. 14% of stops were on individuals over 36 years and there were only 3 stops on individuals over 60 years.

¹ Stop & Searches from 1st March 2020 – 31st January 2021 by CSP: Broxbourne - 943, Dacorum- 923, East Herts – 543, Hertsmere – 658, North Herts – 795, St. Albans – 1046, Stevenage – 1168, Three Rivers – 480, Watford – 1145, Welwyn Hatfield – 754.

² November 2019: 594 25 years or under, 121 between 26 and 35 years, 110 over 36 years. January 2020: 417 25 years or under, 105 between 26 and 35 years, 79 over 36 years.

The panel review ethnicity each month broken down by CSP. The table below shows the percentage of stops for each district where the officer defined ethnicity as black or Asian.

	March	April	May	June	July	Aug	Sept	October	November	Average
Countywide	27.1%	26.5%	27.0%	22.9%	26.0%	25.7%	27.7%	26.2%	26.7%	26.2%
Broxbourne	26.5%	26.7%	30.0%	10.2%	12.1%	26.0%	19.4%	17.3%	13.0%	20.1%
Dacorum	28.3%	19.5%	19.0%	20.2%	24.6%	24.3%	27.8%	25.3%	19.4%	23.2%
East Herts	13.7%	17.6%	15.2%	5.6%	23.3%	15.0%	11.8%	16.4%	14.6%	14.8%
Hertsmere	26.4%	27.5%	20.9%	22.1%	26.7%	23.7%	14.8%	12.5%	39.3%	23.8%
North Herts	21.2%	11.0%	20.3%	22.9%	30.2%	17.9%	15.5%	22.0%	9.1%	18.9%
St Albans	33.3%	31.9%	34.3%	30.6%	33.0%	45.1%	47.3%	35.6%	30.4%	35.7%
Stevenage	12.7%	25.6%	26.3%	16.7%	17.5%	19.1%	15.2%	9.1%	19.8%	18.0%
Three Rivers	28.6%	14.9%	34.9%	36.1%	16.7%	17.6%	26.5%	17.9%	24.4%	24.2%
Watford	38.7%	40.5%	43.6%	42.3%	45.0%	35.5%	55.8%	61.2%	46.5%	45.4%
Welwyn Hatfield	43.1%	35.4%	18.0%	10.4%	29.3%	23.2%	36.4%	36.4%	38.9%	30.1%

A higher proportion of stops for those of black and Asian ethnicity are seen in Watford, Welwyn Hatfield and St Albans. Watford and St Albans are also two of the areas that see the highest number of stop and searches undertaken each month. The Constabulary has recently started a pilot in Watford using Echo to encourage and capture feedback from those who have been stopped & searched. There could be an opportunity to contact individuals who provide feedback and invite them to join the stop & search panel or to attend a panel meeting to share their experience and views.

The data shows that in Hertfordshire you are more likely to be stopped if you are under the age of 35. Currently of the 19 members on the panel 5 are 35 years or younger. There is also a significant number of stops undertaken on those under the age of 21 years. There is an opportunity to engage more with young people on stop & search. Due to the requirements of vetting they may not be able to join the panel but there will be other ways to engage. This would include engagement opportunities with schools, colleges and youth groups; something that was being arranged pre pandemic and will be progressed when face to face sessions can recommence. There is also an opportunity to engage with young people who have a lived experience of stop and search through the voice of the child work with Hertfordshire County Council colleagues.

Recognising that there is a greater percentage of stops for those of black and Asian ethnicity in comparison to the population of Hertfordshire there could be enhanced engagement with BAME networks and local community groups.

In order to increase transparency and encourage greater engagement, virtual forums could be explored where those who have been stopped and searched could share their experiences. This could take the form of a live streamed meeting or engagement session where members of the public are invited to hear about what the panel does and individuals are encouraged to share their experience of being stopped and searched. Themes and trends could be identified and reviewed in the next panel meeting. This would also help to identify community concerns.

4. Members of the public to go out with the police and see stop & search in action

The opportunity to go out with the police and observe stop and searches is something that is always offered to new panel members who are encouraged to take up the opportunity. Due to the pandemic this is not something which new members have been able to participate in. As soon as this is possible it will be arranged.

In order to widen the general public's understanding of stop and search, panel members who have been out with police and seen stop and searches in action could film a short video clip too. This could form part of an active campaign to encourage more members of the public to take up the opportunity to go out with

the police. This campaign could actively link in with local community groups to ensure individuals of all ages and ethnicities are able to take up the opportunity of they wish to.

A number of members of the general public who have been out with police could be invited to stop & search panel meetings to discuss their experience with the panel and the Constabulary.

5. Understanding community concerns

The guidance states that ‘scrutiny should ordinarily focus on the issues that are of greatest concern to local communities (eg, searches of children or vulnerable people, race disproportionality, grounds or authorisations for searches, the quality of interactions and effectiveness).’

This is an area that could also be improved through greater community engagement either online or virtually.

Number of Stop Searches, arrests and positive disposals between 01/02/2020 – 31/11/2020 for 10 CSPs

CSP (population size ³)	Stop Searches	Arrests	% Arrest rate	Other Positive disposals	Positive Disposal and Arrest rate
Broxbourne (97,279)	831	86	10.4%	133	26.4%
Dacorum (154,736)	750	76	10.1%	112	25.1%
East Herts (149,748)	463	39	8.4%	60	21.4%
Hertsmere (104,919)	544	74	13.6%	94	31.0%
North Herts (133,570)	716	58	8.1%	100	22.1%
St Albans (148,452)	815	142	17.4%	98	29.5%
Stevenage (87,845)	997	86	8.6%	93	18.0%
Three Rivers (93,323)	382	38	10.0%	69	28.0%
Watford (96,577)	943	73	7.7%	110	19.4%
Welwyn Hatfield (123,043)	667	95	14.2%	57	22.8%
Total (1,189,519)	7267	794	10.9%	940	23.9%

³ [Estimated population of Hertfordshire and its Districts at mid-2019](#)

Appendix

The following principles – framed specifically in terms of force scrutiny panels – can be applied to any independent scrutiny process introduced by forces and/or their PCCs or equivalents for stop and search (eg, independent advisory groups).

Representative – Forces should consider the extent to which the composition of scrutiny panels reflects the diversity of their local areas (eg, age, ethnicity, gender and social class) and be proactive in ensuring sufficient representation from socially marginalised groups and those most affected by stop and search (eg, young people, people from black and minority ethnic groups). The process for recruiting members to the panel should be transparent. If there are gaps in panel membership, it may be appropriate for forces to use other engagement methods to ensure the views of underrepresented groups are heard and taken into account. Forces may need to:

- carry out community mapping exercises
- target the recruitment of panel members from underrepresented groups
- monitor attendance levels at panel meetings
- vary the timing and location of meetings to make it easier for people from underrepresented groups to attend
- consider alternatives to formal meetings if they discourage attendance (eg, social media, visits to focal points for different communities)
- take steps to overcome any barriers to engagement
- understand the reasons why panel members stop attending
- ensure the results of other community engagement activities inform the work of scrutiny panels

Forces are also required, under the public sector equality duty (section 149 of the Equality Act 2010), to have due regard to the need to:

- eliminate discrimination
- advance equality of opportunity
- foster good relations between different people

Independent – Scrutiny panels should ordinarily be chaired by someone independent of the police (ie, someone from the community rather than a serving or former police officer or staff member), unless there is a good reason why this is not possible. The process for appointing chairs should be transparent, as should their period of tenure. The membership of scrutiny panels will need to be renewed periodically to help ensure they maintain a critical distance from the police. Any potential conflicts of interest that could lead to the independence of panels being brought into question should also be registered and, if necessary, mitigated.

Purposeful – Scrutiny panels should have clear aims, responsibilities and terms of reference. Scrutiny should ordinarily focus on the issues that are of greatest concern to local communities (eg, searches of children or vulnerable people, race disproportionality, grounds or authorisations for searches, the quality of interactions and effectiveness). It should also be clear how scrutiny panels relate to any other community oversight groups convened by the force and/or its PCC or equivalent and the wider governance processes around stop and search.

Supported – Forces should provide support to scrutiny panels so they have the capacity, capability and confidence to fulfil their stated aims. This should ordinarily include the provision of relevant information

(eg, statistical data, supporting explanatory notes and search records) as well as lay observation opportunities (eg, of operations likely to involve stop and search or where 'no suspicion' searches have been authorised). Forces may also decide it is necessary to provide additional support to chairs and panel members (eg, training on the law, how to interpret data and the complaints process, and administrative support) for panels to function properly. Forces may also need to make reasonable adjustments for members to participate fully.

Influential – Panel members can reasonably expect to effect change in forces' policies, procedures and practices on stop and search by engaging in constructive oversight, dialogue and challenge. This may be made more likely by the involvement of senior police leaders in the work of scrutiny panels. To ensure community ownership of the scrutiny process, members should be able to exert influence over the agenda. They should also feel able to discuss with forces what information they would like to scrutinise and how that information is selected and presented. Forces should consider all reasonable requests, and provide an explanation if they are unable to fulfil any (eg, on cost or legal grounds). Forces should allow panel members to voice any concerns about stop and search which should include an agreed policy and process, (contained within the terms of reference), for raising matters of concern relating to potential misconduct with professional standards departments for assessment by the Appropriate Authority. The views of panel members and any recommended actions should be recorded in an auditable way (ie, meeting minutes). The police should also establish mechanisms for reporting back to the panel any action they take in response, and recording the results of these actions. Where no action is taken, forces should explain why.

Transparent – Forces should be open with the wider general public about the purpose, membership and work of scrutiny panels, and be able to provide a well-evidenced explanation for the scrutiny arrangements that they have adopted (eg, their nature and extent). This could involve, for example, publishing information about the panels on forces' websites (eg, terms of reference, minutes), holding some panel meetings in public (with the necessary safeguards) and communicating the work of the panel to those most likely to be searched.

Confidential – Scrutiny panels must operate in accordance with the GDPR and ensure personal data relating to police officers and members of the public remain secure. Forces may share personal data with scrutiny panels if it is necessary and proportionate for them to do so to fulfil a legal requirement, provided that appropriate safeguards are in place. Forces are advised to carry out a data protection impact assessment (DPIA) before doing so. In some circumstances, it may be appropriate for forces to agree data sharing protocols with scrutiny panels, ask members to sign non-disclosure agreements and/or share anonymised stop and search records. Where forces and PCCs or equivalents both play a role in the management of scrutiny arrangements, their responsibilities in respect of the processing of personal data should be made clear.

Scrutiny of body-worn video camera footage - Forces that have introduced body-worn video cameras (BWVC) should have policies for their use consistent with guidance from the Information Commissioner's Office. These policies should specify whether the recording of stop and search encounters by officers is required (and, if so, under what circumstances and any exemptions) and how the resulting footage is to be processed.

It is for forces to decide whether to allow scrutiny panels to review footage of individual stop and search encounters (where such footage is available). Such footage may have particular value as the only realistic option for scrutiny panels to review how stop and search is carried out by officers. Special care is required by forces when sharing this footage because of the risks to individuals whose data is being disclosed. Forces

must only disclose specific pieces of footage if they have a legitimate basis for doing so and put appropriate safeguards in place.

If forces wish to share body-worn video footage with scrutiny panels, they are advised to liaise with their data protection officers – prior to sharing any data – to:

- carry out DPIAs
- ensure related policies are in place that set out, for example, the reasons when it would be (in)appropriate to share footage, the risks involved and the safeguards to help mitigate them
- develop procedures consistent with the DPIA and related policies
- When forces carry out their DPIAs and/or develop policies and procedures, they should consider the following questions prior to sharing any footage and document their responses as appropriate:
- what is the purpose of, and justification for, sharing the footage?
- what are the likely costs and benefits of sharing the footage?
- with whom is the footage to be shared and does it raise any particular sensitivities (eg, because of the age or the person viewing it)?
- which specific footage is to be shared, why, and does it raise any particular sensitivities (eg, because of the vulnerability of those involved)?
- what actions are to be taken to prevent, or in reaction, to:
- panel members reviewing footage involving someone they know or recognise
- unauthorised access to the footage (eg, use of secure rooms, limiting the number of people who view the footage)
- personal data and other sensitive information being shared outside the scrutiny group (eg, restricting note-taking and the use of recording devices, asking panel members to sign non-disclosure agreements)
- the unnecessary intrusion into people’s privacy (including of the people searched, police officers and other parties)
- secondary trauma resulting from panel members viewing the footage?

Lay observation - The Best Use of Stop and Search Scheme (BUSSS) requires participating forces to provide opportunities for members of the public to accompany police officers on patrol. Forces should also consider allowing members of the public to observe operations during which stop and search powers are expected to be used or when ‘no suspicion’ searches are to be authorised (but only when it is safe for them to do so). While there may be few opportunities for them to observe stop and search being practiced on patrol, lay observation provides an opportunity for forces to increase their transparency, improve public understanding of policing and identify areas for improvement. Forces should seek to mitigate any risks associated with local vetting policies restricting access to lay observation opportunities (eg, among those most likely to be affected by stop and search).

Forces should proactively seek feedback from members of the public who participate in lay observation. Any feedback should ordinarily be shared with scrutiny panels for them to consider. Each force should complete their own risk assessment for any person on patrol under the lay observation scheme. The scheme should be open to young people subject to risk assessment, which may restrict the nature of the activities in which they can participate.

Complaints - The BUSSS requires participating forces to have community complaints trigger policies. These policies should set out the volume or nature of complaints about stop and search at which the police must explain its use of stop and search powers to scrutiny groups.

Forces are required to involve local communities (eg, scrutiny panel members) in the development of their policies, such as discussing with them the volume or nature of complaints that would be an appropriate trigger for the process. Where complaints are particularly low or forces wish to achieve a maximum level of transparency, they may consider treating every complaint as a trigger for police explanation and community scrutiny.

Forces should develop and publish a policy that:

- ensures individuals who are stopped and searched are made aware of the complaints trigger, and how and where to complain (eg, by including the relevant information on stop and search receipts)
- sets out a straightforward and accessible complaints process
- introduces a threshold above which the police must explain their use of stop and search, primarily to local community groups responsible for scrutinising the use of stop and search

For the complaints trigger to be effective, forces may need to ensure that complaints resulting from stop and search are identifiable on their systems.

Some people may find it difficult or be reluctant to engage with the police directly for a variety of reasons. In recognition of this, forces should consider identifying and raising awareness (eg, on their websites) of groups or organisations working locally who can provide support, advice or advocacy to people wanting to complain.

Current progress of S&S Hertfordshire Scrutiny Panel

Theme	Recommendation	Progress
Representative	Carry out community mapping exercise	To be explored
	Target the recruitment of panel members from underrepresented groups	Latest recruitment saw 66% of those recruited to the panel from underrepresented groups
	Monitor attendance levels at panel meetings	√
	Vary the timing and location of meetings to make it easier for people from underrepresented groups to attend	√
	Consider alternatives to formal meetings if they discourage attendance (eg, social media, visits to focal points for different communities)	To be explored
	Understand the reasons why panel members stop attending	√
	Ensure the results of other community engagement activities inform the work of scrutiny panels	Community Engagement has been on hold due to pandemic and restrictions
Independent	Chaired by someone independent of the police	√
	Process for appointing chairs should be transparent, as should their period of tenure	√
	Membership of scrutiny panels will need to be renewed periodically to help ensure they maintain a critical distance from the police	√ - although we don't currently have a limit on the time someone can sit on the panel for
Purposeful	Have clear aims, responsibilities and terms of reference	√
	Scrutiny should ordinarily focus on the issues that are of greatest concern to local communities (eg, searches of children or vulnerable people, race disproportionality, grounds or	To be explored

	authorisations for searches, the quality of interactions and effectiveness)	
	Clear how scrutiny panels relate to any other community oversight groups convened by the force and/or its PCC or equivalent and the wider governance processes around stop and search	Could be made clearer with regards to Coercive Powers Board & Support and Challenge panel
Supported	Forces should provide support to scrutiny panels so they have the capacity, capability and confidence to fulfil their stated aims	✓
	Provision of relevant information (eg, statistical data, supporting explanatory notes and search records)	✓
	Lay observation opportunities (eg, of operations likely to involve stop and search or where 'no suspicion' searches have been authorised)	To be explored
Influential	Involvement of senior police leaders in the work of scrutiny panels.	✓
	Members should be able to exert influence over the agenda.	✓
	Members should feel able to discuss with forces what information they would like to scrutinise and how that information is selected and presented	✓
	Forces should consider all reasonable requests, and provide an explanation if they are unable to fulfil any (eg, on cost or legal grounds).	✓
	The police should also establish mechanisms for reporting back to the panel any action they take in response, and recording the results of these actions. Where no action is taken, forces should explain why.	✓
Transparent	Forces should be open with the wider general public about the purpose, membership and work of scrutiny panels, and be able to provide a well-evidenced explanation for the scrutiny arrangements that they have adopted (eg, their nature and extent) – This could involve, for example, publishing information about the panels on forces' websites (eg, terms of reference, minutes), holding some panel meetings in public (with the necessary safeguards) and communicating the work of the panel to those most likely to be searched.	✓
Confidential	Operate in accordance with the GDPR and ensure personal data relating to police officers and members of the public remain secure.	Vetted to level 2 Signed volunteer agreements Signed non-disclosure agreements then viewing BWV S&S records are redacted
Scrutiny of BWV camera footage	Special care is required by forces when sharing this footage because of the risks to individuals whose data is being disclosed. Forces must only disclose specific pieces of footage if they have a legitimate basis for doing so and put appropriate safeguards in place.	✓
Lay observation	The Best Use of Stop and Search Scheme (BUSSS) requires participating forces to provide opportunities for members of the	To be explored

	public to accompany police officers on patrol. Forces should also consider allowing members of the public to observe operations during which stop and search powers are expected to be used or when 'no suspicion' searches are to be authorised (but only when it is safe for them to do so). While there may be few opportunities for them to observe stop and search being practiced on patrol, lay observation provides an opportunity for forces to increase their transparency, improve public understanding of policing and identify areas for improvement.	
Complaints	Forces are required to involve local communities (eg, scrutiny panel members) in the development of their policies, such as discussing with them the volume or nature of complaints that would be an appropriate trigger for the process. Where complaints are particularly low or forces wish to achieve a maximum level of transparency, they may consider treating every complaint as a trigger for police explanation and community scrutiny.	To be reviewed
	For the complaints trigger to be effective, forces may need to ensure that complaints resulting from stop and search are identifiable on their systems.	√
	Some people may find it difficult or be reluctant to engage with the police directly for a variety of reasons. In recognition of this, forces should consider identifying and raising awareness (eg, on their websites) of groups or organisations working locally who can provide support, advice or advocacy to people wanting to complain.	To be explored