



Cheshire Police and Crime Panel - Complaints Management Sub Committee Agenda

Date:	Thursday 30th October 2025
Time:	6.30 pm
Venue:	Committee Suite 1, 2 and 3, Delamere House, Delamere Street, Crewe, CW1 2JZ

The agenda is divided into 2 parts. Part 1 is taken in the presence of the public and press. Part 2 items will be considered in the absence of the public and press for the reasons indicated on the agenda and in the report.

PART 1 – MATTERS TO BE CONSIDERED WITH THE PUBLIC AND PRESS PRESENT

1. Apologies for Absence

To receive any apologies for absence.

2. Code of Conduct - Declaration of Interests. Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012

Members are reminded of their responsibility to declare any disclosable pecuniary or non-pecuniary interest which they have in any item of business on the agenda no later than when the item is reached.

3. Complaints received about the conduct of the Police and Crime Commissioner (Pages 3 - 40)

To consider the complaints.

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Cheshire Police and Crime Panel

Complaints Management Sub Committee

Date of Meeting: 30th October 2025

Report of: Brian Reed, Head of Democratic Services, Host Authority

Subject: Complaints about the Police and Crime Commissioner

1. Report Summary

- 1.1 This report outlines three complaints about the Police and Crime Commissioner received by the Panel in July and August 2025, along with the response to each complaint received from the Police and Crime Commissioner / the Commissioner's Office.

2. Recommendation

- 2.1 It is recommended that the Sub-Committee consider each complaint separately. The options open to the sub - committee in relation to each complaint include:

- Asking the complainant and / or Commissioner for further written information, giving a clear timescale for its submission.
- After fully evaluating all submitted documents, providing written feedback to the complainant and the Commissioner.
- Inviting the complainant and Commissioner, with the Chief Executive, or other member of the Commissioner's staff, to a private meeting to attempt to resolve the complaint by informal resolution.

3. Background information

- 3.1 The sub committee's role is to administer the arrangements for non-criminal complaints against the Police and Crime Commissioner, its Terms of Reference, along with the Panel's complaints procedure are attached as Appendix I. The attention of Sub Committee members is drawn to section seven of the complaints procedure – fairness, transparency and confidentiality.
- 3.2 Three separate complaints have been received; all make allegations that the Commissioner has breached his own code of conduct. The full text of each complaint is attached in Appendix II. The only information that has been

redacted are names and other personal information. A copy of the Commissioner's Code of Conduct is attached as part of Appendix II.

- 3.3 Whilst three complaints have been received, complaints two and three are from the same person. Complaint two was sent in a private capacity, whilst complaint three was sent in the complainant's capacity as an elected councillor. Whilst the three complaints are being managed separately the subject matter of each complaint are related.
- 3.4 In accordance with Section 4 of the complaint's procedure, each complaint, when received was shared with the Chair and Deputy Chair of the Sub Committee. In all three cases they determined that the complaint should proceed and that the most appropriate way forward was to hold a formal meeting of the Sub Committee to consider the complaints in detail.
- 3.5 Details of each complaint were sent to the Commissioner, asking for his comments. In the case of complaint three, further information was requested from the complainant, this was received and was sent to the Commissioner. The additional information provided by the complainant is reproduced in Appendix II.
- 3.6 The responses received from the Police and Crime Commissioner are attached in Appendix II.

4. Financial Implications

- 4.1 There are no financial implications.

5. Legal Implications

- 5.1 The Police and Crime Commissioner ("PCC") is governed by the Police Reform and Social Responsibility Act 2011. The 2011 Act and associated regulations (Elected Local Policing Bodies (Complaints and Misconduct) Regulations 2012.) provide for the process and investigation of complaints. The PCC is subject to an ethical framework and Code of Conduct which include agreeing to abide by the Nolan Principles and not to use the resources of the Commissioner improperly or for political purposes (including party political purposes).
- 5.2 In their personal capacity, the PCC may engage in political activities, including making personal endorsement in the same way as any other citizen can. A PCC must be clear about when they are acting as a PCC and when they are acting as an individual.
- 5.3 The circumstances in which a serving Police and Crime Commissioner ("PCC") may be removed from office are very limited. Barring death or resignation it is only where the PCC is disqualified from holding office that they may be removed. These relate to:

- Bankruptcy/insolvency/debt relief restriction;
- A conviction for an imprisonable offence; or

- Being required to vacate the post by reason of being elected as an MP.

6. Equality implications

6.1 There are no specific equality issues related to this report.

7. Contact information

Name:	Martin Smith
Designation:	Registration and Civic Services Manager
Local Authority:	Cheshire East Council
Telephone:	07596 064905
Email:	martin.r.smith@cheshireeast.gov.uk

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COMPLAINTS MANAGEMENT SUB-COMMITTEE

Terms of Reference

Role

1. The role of the Police and Crime Panel's Complaints Management Sub-Committee (hereinafter called the Sub-Committee) is to administer the arrangements for non-criminal complaints made against the Police and Crime Commissioner for Cheshire (and Deputy Commissioner, when appointed); together with other complaints and conduct matters referred to the Panel by the Independent Office for Police Conduct (IOPC).
2. The Sub - Committee will report on its work to the Police and Crime Panel on a regular basis (minimum twice a year). It has delegated authority from the Panel to undertake all of the Panel's complaint management and resolution roles but may, if the Chair and Deputy Chair of the Sub-Committee so determine, refer matters to the full Police and Crime Panel for resolution.

Resolution of complaints

3. The Sub-Committee will seek to resolve complaints through informal resolution. This means dealing with a complaint by resolving, explaining, clearing up or settling the matter directly with the complainant and/or the Commissioner, without investigation or formal proceedings. It is a flexible proportionate and fair process that may be adapted to the needs of the complainant and the individual complaint. This may be done, for example by correspondence and/or in a face to face meeting. The Sub - Committee cannot conduct an investigation of a complaint, such as by taking statements or obtaining evidence about it, however, as is to be expected in any fair process, it can invite the complainant and Commissioner to clarify or comment on matters.

Complaints the Sub-Committee may consider

4. The Sub Committee may only consider relevant complaints as defined in the Elected Local Policing Bodies (Complaints and Misconduct) Regulations 2012. There are separate procedures for complaints about operational policing matters, complaints about the Chief Constable and other police officers and complaints about the Police and Crime Commissioner's staff. The Sub-Committee (and Panel) has no role to play in such complaints.

5. The Sub - Committee (and Panel) are not an appeals body for complaints against Cheshire Constabulary or the Chief Constable and has no legal power to look into, investigate or order actions to be taken in such cases. Such complaints fall outside of the Sub-Committee's and Panel's jurisdiction.
6. The Chair and Deputy Chair of the Sub - Committee, advised as necessary by the host authority's Monitoring Officer, will determine whether a complaint can be considered by the Sub Committee.
7. Complaints about the merits of a decision made by the Police and Crime Commissioner; for example, where somebody disagrees with a policy the Commissioner has introduced, cannot usually be considered by the Sub-Committee, although complaints about whether a decision was taken properly and in accordance with procedures can be considered. The potential remit of the Complaints Sub-Committee necessarily matches the scope and reach of the Commissioner and the Commissioner's office.
8. Concern from the general public about a particular policy is something the Police and Crime Panel should be aware of, and reflect upon, as it scrutinises the Commissioner's policies. These concerns would not, of themselves be matters to be considered through the Complaints procedure.

Timescales

9. The Sub – Committee will endeavour to conduct its work within 40 working days of receiving a complaint. The Panel's Secretariat will keep a complainant updated on progress with a complaint and inform them of any unexpected delays.

Membership

10. The Sub – Committee will comprise of 7 Panel Members appointed by the Police and Crime Panel. Proportionality will be in accordance with the Panel's Procedure Rules as they relate to the constitution of Sub – Committees and Working Groups. The Chair and Deputy Chair of the Sub-Committee will ordinarily be appointed at the Panel's Annual Meeting.

Advisors to the Sub-Committee

11. The Sub – Committee will be advised by the Panel's Secretariat and the host authority's Monitoring Officer.

Complaints Procedure

Legal Background

The Cheshire Police and Crime Panel Complaints Procedure has been drafted in accordance with the Elected Local Policing Bodies (Complaints and Misconduct) Regulations 2012. Where there is any doubt over the application of the Complaints Procedure reference should be made to the Regulations.

1. Introduction

- 1.1 The aim of this procedure is to ensure that complaints made against the Police and Crime Commissioner for Cheshire (and Deputy Commissioner, when appointed); together with other complaints and conduct matters referred to the Panel by the Independent Office for Police Conduct (IOPC) are managed efficiently and transparently.
- 1.2 Details on the operation of the Complaints procedure can be found on the Panel's page of the Cheshire East Council website as can details of how previous complaints have been resolved.
- 1.3 The Complaints Management Sub – Committee will endeavour to conduct its work within 40 working days from receipt of a complaint.

2. Roles and Responsibilities

- 2.1 The Complaints Procedure and the management of complaints is delegated to the Police and Crime Panel's Complaints Management Sub – Committee with the initial filtering and administration performed by the Chair and Deputy Chair of the Sub-Committee acting together.
- 2.2 The Chair and Deputy Chair of the Sub – Committee may in some circumstances determine that a complaint is best managed by the full Police and Crime Panel.
- 2.3 The Chair and Deputy Chair of the Sub – Committee (consulting with Sub - Committee members and the wider Panel as necessary), will decide the most appropriate and proportionate arrangements for managing a complaint. They are not empowered to determine the outcome of complaints other than determining that a matter need not be considered further as one or more of the circumstances set out in Appendix A applies or it is otherwise clear the complaint does not relate to the Police and Crime Commissioner (or Deputy).
- 2.4 The work of the Chair and Deputy Chair and of the Sub – Committee will be supported and advised by the Panel's Secretariat and the host authority's Monitoring Officer.

3. Making a complaint

- 3.1 Complaints should be submitted by email to martin.r.smith@cheshireeast.gov.uk

or by post to:

Cheshire Police and Crime Panel
Cheshire East Council
Democratic Services and Governance
c/o Municipal Buildings
Crewe
Cheshire
CW1 2BJ

- 3.2 If sufficient information is not provided, further clarification may be sought. Complaints cannot be submitted by social media or by phone.
- 3.3 Complaints will be logged by the Panel's Secretariat and acknowledged by e-mail or letter, within 3 working days.

4. Following receipt of a complaint

- 4.1 Within 4 working days of a complaint being received the information provided to the Secretariat will be shared with the Chair and Deputy Chair of the Sub – Committee for determination as to whether the complaint can be considered by the Sub – Committee (or wider Panel). This decision should be taken expeditiously and ideally within 4 working days.
- 4.2 If it is determined that the matter should be referred to the Independent Office for Police Conduct (IOPC) the complainant will be informed and the IOPC contacted. If the IOPC subsequently refer the matter back to the Panel the complaint will re-enter the Police and Crime Panel's complaints process.
- 4.3 If the Chair and Deputy Chair determine that the complaint cannot be considered by the Sub - Committee because, for example, it relates to an operational police matter, or is a complaint about the Chief Constable or a member of the Commissioner's staff, the complainant will be informed in writing. If deemed appropriate the complainant will be advised as to how best to proceed with their complaint.
- 4.4 If the Chair and Deputy Chair consider that one or more of the circumstances set out in Regulation 15 of the Elected Local Policing Bodies (Complaints and Misconduct) Regulations 2012 (see Appendix A) apply, and they consider that there are not circumstances justifying the continued consideration of the complaint either in whole or in part, they shall after having given the complainant a reasonable opportunity to provide further information or clarification advise the Sub-Committee of their decision and the reasons for it. Should they choose to do so they can refer this decision to the Sub-Committee as a whole; however, if

they do not their decision is final and binding. If a complaint is not considered further on this basis the fact of the complaint and the reasons why it was not considered further shall be recorded in the Register of Complaints and both the complainant and the Commissioner notified.

- 4.5 If the Chair and Deputy Chair consider that the complaint should proceed, details of the complaint will be forwarded to the Commissioner or Deputy Commissioner with confidential information redacted if this is seen as necessary, they will be asked to comment on the complaint within 10 working days.
- 4.6 Whether or not a response has been received from the Commissioner or Deputy Commissioner, details of the complaint, including the form detailing the nature of the complaint, any supporting documents and any response from the Commissioner or Deputy Commissioner will be forwarded to all Sub – Committee members for initial evaluation. This will be undertaken by them within 5 working days. If the Chair and Deputy Chair determine that the Panel collectively should review a complaint details will be sent to all Panel members.
- 4.7 The Chair and Deputy Chair; having consulted with other Complaints Management Sub – Committee members, or wider Panel membership, or having held a formal meeting of the Sub – Committee to discuss the complaint and having taken advice from Officers as necessary, will determine how best to administer the complaint. Options open to the Sub – Committee include:
 - Asking the complainant and or Commissioner (or Deputy Commissioner) for further written information; giving a clear timescale for its submission;
 - After fully evaluating all submitted documentation, providing written feedback to the complainant and the Commissioner; and
 - Inviting the complainant and the Commissioner (or Deputy Commissioner), with the Chief Executive, or other member of the Commissioner's staff, to a private meeting to attempt to resolve the complaint by informal resolution. Ten days' notice of such a meeting would normally be given.
- 4.8 If at any stage a complainant decides that they wish to withdraw their complaint, or that they wish to discontinue it, the Chair and Deputy Chair will be informed, and the Register of Complaints updated. In some circumstances the Chair and Deputy Chair may decide that they wish the Sub – Committee to proceed to consider issues arising from the complaint and should they so decide, the complainant and Commissioner (or Deputy Commissioner) will be informed accordingly.
- 4.9 If a meeting of the Sub-Committee or Panel is held to discuss an individual complaint and how it should be managed, any confidential or exempt issues will be considered in Part II of the Meeting with the press and public excluded. If allowed by national Regulations and by the Police and Crime Panel's own Procedure Rules, the meeting may be held virtually using a technological platform approved by the host authority's Monitoring Officer.

5. Record keeping

- 5.1 A record of the outcome of the informal resolution will be made as soon as practicable after the process has been completed. Copies will be sent to the complainant and the Commissioner or Deputy Commissioner.
- 5.2 The record of the outcome of informal resolution will ordinarily be published, with any confidential information such as the name of the complainant being redacted. Before publishing, the Chair of the Complaints Management Sub - Committee will give the complainant and the Commissioner or Deputy Commissioner the opportunity to make representations in relation to the proposed publication.
- 5.3 In cases where an informal resolution cannot be agreed, the record will detail the reasons given by the parties why the matter could not be resolved.
- 5.4 The Secretariat, on behalf the Sub - Committee will maintain a formal register for the purposes of recording complaints and conduct matters under the Regulations. The Recorded Complaints and Conduct Matters Register will record key details pertaining to a complaint including the date received, the complainant, a summary of the complaint / the category into which it falls, the date on which it was recorded, actions taken on the complaint under the Regulations and any other information deemed relevant. A report detailing the number and nature of complaints will be taken to the Panel's Annual Meeting and the December meeting.

6. Following the consideration of a complaint

- 6.1 There is no appeal regarding the outcome of a complaint once it has been determined.
- 6.2 The Local Government and Social Care Ombudsman has jurisdiction over the administrative functions of the Police and Crime Panel, and complainants can contact the Ombudsman if they are unhappy with the way that the complaint was handled. The Panel's complaints procedure will need to be followed to its conclusion, before the Local Government Ombudsman will become involved.

7. Fairness, transparency and confidentiality

- 7.1 If a Panel member is approached by either a complainant or a potential complainant, they should take care so as not to discuss the merits of the complaint or otherwise express any views on it. The Panel member should look to confine their involvement in any interchange to explaining the complaints procedure and where the actual or potential complainant can obtain advice or register their complaint. The Panel member so approached must disclose every contact he or she has had with a complainant or potential complainant and describe the extent of their contact or interchange with him or her at the first reasonable opportunity. The Panel member should consider:

- His or her obligations under the Code of Conduct;
 - Whether the contact should be seen as prejudicing their impartiality, and
 - Whether he or she should withdraw from any further involvement in the matter.
- 7.2 All information sent to Complaints Management Sub-Committee members by the Secretariat containing confidential details of any complaint and all written communication between Sub - Committee members containing confidential details of any complaint will be sent using secure, encrypted email or by Royal Mail Special Delivery post. No communication will be made by SMS (text), WhatsApp or similar media.
- 7.3 General Data Protection Regulations (GDPR) will be complied with at all times by the Secretariat, the host authority's Monitoring Officer and all Panel members.
- 7.4 The Secretariat will keep complainants updated on the progress of their complaint.

Appendix A

The circumstances in which a complaint need not be considered further include:

- The complaint has been made by a member of the relevant office holder's staff, arising from the staff member's work as such (see Regulation 15(3)(a)).
- The complaint is more than 12 months old and there is no good reason for the delay, or the delay would be likely to cause injustice (see Regulation 15(3)(b)).
- The complaint is about conduct that is already the subject of another complaint (see Regulation 15(3)(c)).
- The complaint has been made anonymously (see Regulation 15(3)(d)).
- The complaint is deemed to be vexatious, oppressive or otherwise an abuse of process for dealing with complaints (see Regulation 15(3)(e)).
- The complaint is repetitious (see Regulation 15(3)(f), and also Regulation 15(4) for the particular circumstances in which a complaint is deemed to be repetitious).



**Cheshire
Police & Crime
Commissioner**

**ETHICAL FRAMEWORK AND CODE OF CONDUCT FOR THE POLICE
AND CRIME COMMISSIONER**

Version No.	1	Review Date:	10/05/2024
Policy author:	Research and Analysis Officer	Policy owner:	Chief Executive
Created on:	20/11/2012	Ratified on:	13/05/2021
Last reviewed on:	10/05/2021	Applicable to:	Police and Crime Commissioner and Deputy.
Equality Impact Assessed on:	A full impact assessment is not required as it is considered that the Codes of Conduct will not disproportionately adversely affect any protected characteristic community as defined in the Equality Act 2011.		
At the time of ratifying this procedure and at the time of all subsequent reviews, the author and the owner of this procedure are satisfied that this document complied with relevant legislation.			

Version Control			
Date	Version	Name	Changes
20/11/2012	1/Draft	E Robertson	Policy created
10/6/2014	1.1	E Robertson	Change of name to Ethical Framework and Code of Conduct
9/5/16	1.2	S Pickup	Minor Amendments
10/05/2021	1.3	C Hodgson	Minor Amendments
26/05/22	1.4	D Taylor	Minor Amendments

CONTENT

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Section 3 – General Obligations

Section 4 – Use of resources

Section 5 – Register of Disclosable Interests

Section 6 – Conflicts of interests

Section 7 – Disclosure of information

Section 8 – Transparency

Section 9 – Complaints

INTRODUCTION

1. This Code applies to the Police and Crime Commissioner when acting in that role. It also applies to the Deputy Police and Crime Commissioner (where appointed) when acting or representing to act in that role. Reference to the Commissioner should also be applied to the Deputy Commissioner (where appointed).
2. This Code does not apply when the above are acting in a purely private capacity.
3. The Commissioner has adopted this Code and has agreed to abide by its provisions.
4. The Policing Protocol¹ provides that all parties will abide by the seven principles set out in Standards in Public Life: First Report of the Committee on Standards in Public Life known as the Nolan Principles.
5. The Commissioner agree to abide by the Nolan Principles which are set out below:

THE SEVEN PRINCIPLES OF PUBLIC LIFE

SELFLESSNESS

Holders of public office should act solely in terms of the public interest. They should not do so in order to gain financial or other material benefits for themselves, their family, or their friends.

INTEGRITY

Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might seek to influence them in the performance of their official duties.

OBJECTIVITY

In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merit.

ACCOUNTABILITY

Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.

OPENNESS

Holders of public office should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.

HONESTY

Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.

LEADERSHIP

Holders of public office should promote and support these principles by leadership and example.

¹ The Policing Protocol Order 2011 No. 2744

6. In addition, the College of Policing in its Code of Ethics includes the following additional principles which are also adopted as part of this Code:

FAIRNESS

All people should be treated fairly.

RESPECT

All people should be treated with respect.

OATH OF OFFICE

7. As Commissioner, he has sworn the following oath of office:

"I, Dan Price of Warrington, do hereby declare that I accept the office of Police and Crime Commissioner for Cheshire.

In making this declaration, I solemnly and sincerely promise that during my term of office:

- *I will serve all the people of Cheshire in the office of Police and Crime Commissioner.*
- *I will act with integrity and diligence in my role and, to the best of my ability, will execute the duties of my office to ensure that the police are able to cut crime and protect the public.*
- *I will give a voice to the public, especially victims of crime, and work with other services to ensure the safety of the community and effective criminal justice.*
- *I will take all steps within my power to ensure transparency of my decisions, so that I may be properly held to account by the public.*
- *I will not interfere with the operational independence of police officers".*

GENERAL OBLIGATIONS

8. The Commissioner agrees:-

- a) To treat others with dignity and respect.
- b) Not to use bullying behaviour or harass any person.
- c) Not to conduct myself in a manner which:-
 - is contrary to the Policing Protocol or any other legal requirement relevant to my role
 - could reasonably be regarded as bringing my Office into disrepute.
- d) To respect the impartiality of officers and not to obstruct or interfere with any officer who may be discharging any responsibilities placed upon them by law.

USE OF RESOURCES

9. The Commissioner agrees:-

- a) Not to use the resources of the Commissioner for personal benefit or for the benefit of themselves, friends, or any other person in relation to any business interest of mine.
- b) Not to use the resources of the Commissioner improperly or for political purposes (including party political purposes).
- c) To claim expenses and allowances only in accordance with the published expenses and allowances scheme of the Commissioner.

REGISTER OF DISCLOSABLE INTERESTS (INCLUDING THOSE OF A PECUNIARY NATURE)

10. The Commissioner agrees:-

- a) To act solely in the public interest and in exercising the functions of the office not act to gain financial or other benefits for themselves, their family, friends, or any person in relation to any business or use or attempt to use their office to confer or secure for any person, including themselves, an advantage or a disadvantage.
- b) Within 28 days of taking office to enter in the register of disclosable interests maintained by the Monitoring Officer of the elected local policing body every disclosable interest as set out in the attached Schedule A.
- c) Within 28 days of any change in circumstances to enter in the register of interests the changes in so far as are related to disclosable interests.
- d) Within 28 days of receipt, to register the acceptance of any gift or hospitality worth £25 or more. (Further information on registering gifts and hospitality is attached at Schedule B.)
- e) If the nature of the interest is such that the Commissioner and the Monitoring Officer consider that disclosure could lead to the Commissioner or a person connected with them being subject to violence or intimidation, then any entry in the register should not include details of the interest but should indicate that the interest has been disclosed and is withheld by virtue of this section.
- f) If there is any doubt about whether something could be considered a registerable interest, the Monitoring Officer, or in their absence the Deputy Monitoring Officer, will be consulted.

CONFLICTS OF INTERESTS

11. In any case where exercising the functions of the office may conflict with any disclosable or other interest, which has become known to the Commissioner, they shall as soon as possible declare such conflict as is required under the Elected Local Policing Body (Specified Information) Order 2021 (as amended) and determine whether the conflict of interest is so substantial that the function should not be exercised personally.

12. They will consider a conflict of interest to be so substantial that they should not exercise the function personally, if it meets the following condition:

a member of the public, with knowledge of the relevant facts, would reasonably consider the interest so significant that it would be likely to prejudice their judgement on the decision.

13. In the event of declaring a conflict of interest, the Commissioner will withdraw from any discussion or decision regarding the item and delegate the matter to the Deputy Police and Crime Commissioner (where appointed). If there is a question about whether the matter may be delegated, they will seek the advice of the Monitoring Officer. Should the Deputy Police and Crime Commissioner (where appointed) also declare a conflict of interest in the same matter they must also withdraw and the matter may be delegated to either the Chief Executive (Monitoring Officer) or the Chief Financial Officer.
14. In the event that the Deputy Police and Crime Commissioner (where appointed) has a conflict of interest in a decision which falls within their delegated functions, the matter should be referred up to the Police and Crime Commissioner.

DISCLOSURE OF INFORMATION

15. The Commissioner agrees not to disclose information given to them in confidence or information acquired by them which is of a confidential nature, unless they have the consent of a person authorised to give it or they are required by law to do so or for the lawful purposes of the office provided that they shall not be prevented from disclosure to a third party for the purpose of obtaining professional legal advice where the third party agrees not to disclose the information to any other person.

16. Any disclosure made by the Commissioner shall be reasonable, be in the public interest and made in good faith.

17. The Commissioner agrees not to prevent another person from gaining access to information to which that person is entitled by law.

TRANSPARENCY

18. A register of interests, register of declarations of conflicts of interest and a register of gifts and hospitality will be maintained and shall be published on the elected policing body's website.

COMPLAINTS

19. The Commissioner acknowledges that in accordance with legal requirements any complaint about the conduct of the Police and Crime Commissioner or Deputy Police and Crime Commissioner (where appointed) shall be referred to the Police and Crime Panel for Cheshire:

The Police & Crime Panel for Cheshire
c/o The Chief Executive Cheshire East Council
Municipal Buildings
Earle Street
Crewe
CW1 2BJ

SCHEDULE A

Disclosable Interests (including those relating to Gifts and Hospitality)

In this Schedule:

“body in which the relevant person has a beneficial interest” means a firm in which the relevant person is a partner or a body corporate of which the relevant person is a director, or in the securities of which the relevant person has a beneficial interest;

“director” includes a member of the committee of management of an industrial and provident society;

“land” includes an easement, servitude, interest or right in or over land which does not carry with it a right for the relevant person (alone or jointly with another) to occupy the land or to receive income;

“elected local policing body” means the elected Local Policing Body to which the relevant person has been elected.

“relevant period” means the period of 12 months ending with the day on which the relevant person makes an entry, amendment, or deletion to the register of disclosable interests.

“relevant person” means the person(s) who is/are **elected/appointed** Police and Crime Commissioner and Deputy Police and Crime Commissioner.

“securities” means shares, debentures, debenture stock, loan stock, bonds, units of a collective investment scheme within the meaning of the Financial Services and Markets Act 2000(b) and other securities of any description, other than money deposited with a building society.

<u>Subject</u>	<u>Disclosable Interest</u>
Employment, office, trade, profession or vocation	Any employment, office, trade, profession or vocation carried on for profit or gain.
Sponsorship	Any payment or provision of any other financial benefit (other than from the elected local policing body) made or provided within the relevant period in respect of any expenses incurred in carrying out duties and responsibilities, as a Police or Deputy Police and Crime Commissioner, or towards the election expenses of the PCC or Deputy PCC. This includes any payment or financial benefit from a trade union within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992(a).
Contracts	Any contract which is made between the relevant person (or a body in which the relevant person has a beneficial interest) and the elected local policing body – (a) under which goods or services are to be provided or works are to be executed; and (b) which has not been fully discharged.

Land	Any beneficial interest in land which is within the area of the elected local policing body.
Licences	Any licence (alone or jointly with others) to occupy land in the area of the elected local policing body.
Corporate tenancies	Any tenancy where (to the knowledge of the relevant person) (a) the landlord is the elected local policing body; and (b) the tenant is a body in which the relevant person has a beneficial interest.
Securities	Any beneficial interest in securities of a body where – (a) that body (to the relevant person's knowledge) has a place of business or land in the area of the elected local policing body; and (b) either – (i) the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body, or (ii) if the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which the relevant person has a beneficial interest exceeds one hundredth of the total issued share capital of that class.
Gifts and Hospitality	The name and address of any person from whom the relevant person has received a gift or hospitality (and a description of the gift or hospitality) with an estimated value of at least £25.

SCHEDULE B

OFFICE OF THE POLICE & CRIME COMMISSIONER FOR CHESHIRE

REGISTERING GIFTS & HOSPITALITY

1. As a general rule offers of gifts or hospitality should be refused courteously in a manner that does not cause offence or embarrassment to the organisation or individual making the offer.
2. If consideration is being given to accepting a gift or hospitality, the Monitoring Officer, or in their absence the Deputy Monitoring Officer, should be consulted prior to a decision being taken. In deciding whether a gift should be accepted the following points should be considered:
 - Why is the offer being made?
 - What are the background circumstances to it?
 - Does the donor feel obliged to make the offer?
 - What does the donor expect in return?
 - What could be the outcome if the offer is accepted or declined?
 - Would the Commissioner be prepared to justify its acceptance to the public?
3. Any gifts or hospitality worth £25 or over should be registered.
4. Details of the donor (for example, the person, company or body) offering the gift or hospitality must also be registered.
5. Only gifts received in connection with official duties or in the course of employment must be registered. Other gifts and hospitality, such as birthday gifts from family, do not have to be registered.
6. An accumulation of small gifts received from the same donor over a short period, with an estimated combined value of £25 or more, should be registered.
7. The gift or hospitality and its donor must be registered within 28 days of receipt, and if an accumulation, when it is estimated that the value has exceeded £25.
8. If the value of the gift or hospitality can not be ascertained it should be registered in any case as a matter of good practice.
9. It is accepted that on rare occasions gifts, or hospitality may be received without prior offer or warning. Where possible they should be diplomatically returned or refused. Where this is not possible the gift, or hospitality should be registered stating the nature, estimated value of the item and clearly stating the surrounding circumstances.
10. For the avoidance of doubt, hospitality is defined as any food, drink, accommodation or entertainment provided free of charge or heavily discounted.

Complaint 1

Text of complaint (31st July 2025):

I would like to present a formal complaint against the Police and Crime Commissioner (PCC), Dan Price.

The allegation against Mr Price is that he is in breach of the Code of Conduct of his office, which he has broken the impartiality of his office to benefit his political party to endorse the Labour Party Candidate in the by election for the Bewsey and Whitecross Ward for Warrington Borough Council.

Please note that this complaint has been made during the campaign, before any count or declaration has taken place.

Mr Price is welcome to make this endorsement as a Labour Party member, however, is not meant to do this as the PCC. This is where he has breached the code of conduct of his office.

Further, I am aware candidates of other parties have tried to reach Mr Price, who have not received a response from him. Therefore, Mr Price has used his office for further political gain, again in breach of his code of conduct, specifically, his impartiality arrangement.

Please note that I am making this complaint as a member of the public and as one of his constituents.

I would like to request Mr Price resigns his office with immediate effect. Should he not do so, a petition will be organised against him.

With kind regards.

Follow up email (4 August 2025)

Dan Price endorsing the candidate during the election: <https://www.warringtonguardian.co.uk/news/25347645.dan-price-backs-labour-candidate-bewsey-by-election/>

Dan Price defending his comments and attacking the critics of his endorsement:

https://www.warrington-worldwide.co.uk/2025/07/30/police-and-crime-commissioner-defends-decision-to-back-labour-candidate-in-by-election/?fbclid=IwQ0xDSwL9b75ibGNrAv1vt2V4dG4DYWWIAjExAAEeJ_3YGmbDeKEmxebEKPD1TvtI9YVxPTTyZ3fqJKFd0WOo14XiR1R34BKcDGE_aem_b5Vs_hWgod3-mwzULTY9qw

Video of his endorsement:

<https://www.facebook.com/share/r/16mQdWK4NN/>

The oath of impartiality requires all Police and Crime Commissioners while performing any duties in their role or as the PCC to "Decisions must be based on evidence and proper consideration, avoiding undue influence from personal opinions or relationships."

This has not happened here. Mr Price is welcome to make

His endorsement as a Labour Party member. Not as a PCC.

Mr Price as PCC in his oath of impartiality is also required to:

"PCCs should act solely in the public interest and not for personal gain." This again has not happened here. The election outcome serves a marker on his performance

But may also present gain for him politically if his party would win. Again, his use of his office to endorse a candidate could have presented him and his party

With some personal gain. This wouldn't have been the case if he made the endorsement simply as a Labour Party member.

I have copied in xxx one of the candidates who sent several emails to Mr Price who never received any responses from him during the campaign. This again demonstrates how he has used his office for personal gain.

Response to complaint 1.



Dan Price
Cheshire
Police & Crime
Commissioner

Police & Crime Panel

Sent via email

shireeast.gov.uk

Dan Price
Police & Crime Commissioner
Office of the Police & Crime Commissioner
2nd Floor
Runcorn Town Hall
Heath Road
Runcorn
WA7 5TD

Date: 14th August 2025

Our Ref:

Tel:
01606 364000

Email:
cheshire-pcc.gov.uk

Dear

RESPONSE TO COMPLAINT

Further to your email received on Friday 8th August enclosing two complaints against the Commissioner, I would like to offer the following response on behalf of the Commissioner. As the complaints are closely related, with one making reference to the other, I thought it might be helpful for the Panel for our response to be combined.

In considering the main issue of these complaints, I feel it is helpful to remind both complainants that Police and Crime Commissioners (PCCs) are elected officials who are all affiliated with political parties. Whilst the Commissioner commits to act with impartiality in his duties relating to policing, there is nothing to stop the Commissioner undertaking political activity, including campaigning, in their personal time. This also applies to other elected persons, such as councillors and MPs.

We can find no evidence that the Commissioner's Code of Conduct has been breached, as any support given for a candidate in a local election was done so in the Commissioner's own time, and no OPCC office resources were used to support the campaigning. This was not an OPCC organised event and the office holds no details whatsoever about the event or indeed the Commissioner's wider political activities, other than that which is published on our website. The rules around impartiality are there to ensure that the Commissioner, when fulfilling his role as PCC, does so impartially. I can find no evidence, whatsoever, in the Commissioner's Code of Conduct which suggests this has been a breach.

The comment in Complaint 1 about other candidates contacting the office and not receiving a response is unclear, as I can find no trace of any such enquiries which have gone unanswered. In any case, any request to support any candidate through the office, regardless of party, would not be permitted and politely declined. I have also studied our phone records and can find no voicemail

messages which have been left around 24th July from the complainant as referenced in Complaint 2. I will further test our system to ensure that we are receiving messages and recording them appropriately and will make any necessary changes if a fault is found on the system.

I hope that this information will be helpful in allowing the Complaints Management Sub-Committee to make its determination on this matter in a timely manner. Please do not hesitate to contact me if you have any questions or require any further clarification.

Yours sincerely

Chief Executive
Office of the Police & Crime Commissioner

COMPLAINT 2

Dear Mr Smith,

I refer to your email to [REDACTED] on 4 August 2025.

I was the Reform UK Candidate for Bewsey & Whitecross during the recent election. Following the release of a video featuring the Labour Candidate and the PCC, I contacted the PCC's office on 24 July 2025 to request a meeting and equal airtime.

I left a detailed message via their answering service (01606 364000) explaining the circumstances and requesting a meeting, but I received no acknowledgement or call back.

Subsequently, I raised the matter with Warrington Town Hall's electoral services, who advised me to submit a complaint to the Police.

I had prepared a press statement calling for the PCC to stand down pending an investigation, consistent with the approach he might take if the Cheshire Chief Constable faced a similar Code of Conduct complaint. However, due to party PR timing constraints, I did not release the statement.

Public feedback, both in the Warrington Guardian comments and on social media, overwhelmingly expressed the view that the PCC showed bias towards the Labour Candidate and failed to remain impartial.

Several people contacted me privately to encourage me to submit a complaint.

I chose to focus on my campaign, which I subsequently won, and I now serve as a councillor for Warrington Borough Council.

If you wish to discuss this matter further, I am happy to take a call. Please use my private contact details below rather than my official WBC contact information.

Kindest regards,

Response to complaint 2



Dan Price
Cheshire
Police & Crime
Commissioner

Police & Crime Panel

Sent via email: cheshireeast.gov.uk

Dan Price
Police & Crime Commissioner
Office of the Police & Crime Commissioner
2nd Floor
Runcorn Town Hall
Heath Road
Runcorn
WA7 5TD

Date: 14th August 2025

Our Ref:

Tel:
01606 364000

Email: cheshire-pcc.gov.uk

Dear

RESPONSE TO COMPLAINT

Further to your email received on Friday 8th August enclosing two complaints against the Commissioner, I would like to offer the following response on behalf of the Commissioner. As the complaints are closely related, with one making reference to the other, I thought it might be helpful for the Panel for our response to be combined.

In considering the main issue of these complaints, I feel it is helpful to remind both complainants that Police and Crime Commissioners (PCCs) are elected officials who are all affiliated with political parties. Whilst the Commissioner commits to act with impartiality in his duties relating to policing, there is nothing to stop the Commissioner undertaking political activity, including campaigning, in their personal time. This also applies to other elected persons, such as councillors and MPs.

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The comment in Complaint 1 about other candidates contacting the office and not receiving a response is unclear, as I can find no trace of any such enquiries which have gone unanswered. In any case, any request to support any candidate through the office, regardless of party, would not be permitted and politely declined. I have also studied our phone records and can find no voicemail

messages which have been left around 24th July from the complainant as referenced in Complaint 2. I will further test our system to ensure that we are receiving messages and recording them appropriately and will make any necessary changes if a fault is found on the system.

I hope that this information will be helpful in allowing the Complaints Management Sub-Committee to make its determination on this matter in a timely manner. Please do not hesitate to contact me if you have any questions or require any further clarification.

Yours sincerely



Chief Executive
Office of the Police & Crime Commissioner

Complaint 3

Text of complaint (17 August 2025)

As you are aware, I have previously corresponded with you using my personal email address. I am now writing in my capacity as Councillor for Bewsey & Whitecross on behalf of Reform UK.

xxxx, I have copied you in as this matter involves residents of Warrington.

My election campaign was based on being a local representative who listens to residents and, where possible, acts on their concerns. I deliberately focused on local issues rather than national debates, and I have had the opportunity to discuss many of these matters formally with Steve Park.

During the campaign, several long-standing Labour supporters approached me to express concerns about personal safety in their community. Their political affiliation was not my concern; I assured them that, if elected, I would assist them, and I have kept that promise without seeking political advantage.

As you are aware, we have been in ongoing **correspondence** regarding Mr Price's open support for the Labour candidate during the Bewsey & Whitecross by-election. Our last exchange indicated that a review panel is currently investigating a resident's complaint about this matter.

In this context, I must raise further concern about comments recently made by Mr Price, published in Warrington Worldwide and shared on social media. In view of the ongoing investigation, I would have expected him to refrain from making such critical and defamatory remarks directed at Reform UK, both nationally and locally.

Please refer to the following:

<https://www.facebook.com/share/p/167Uc5SNNA/>

This raises several important questions.

Does Mr Price consider himself exempt from his code of conduct, preferring instead to dismiss residents' issues by criticising a legitimate political party?

His remark that "Cheshire residents are not daft" raises the question: does he believe Cheshire residents who support Reform UK are somehow excluded from this description?

The article as per the Warrington Guardian article during the By-Election Election certainly has received significant comments from readers criticising, his lack of impartiality.

In his article, he refers to Reform UK allegedly fuelling fear regarding immigration and associating this with crimes ranging from sexual assault to potholes.

He goes on to cite Cheshire Police crime statistics suggesting that "strangers" are less likely to commit sexual offences. I find this clumsy and naïve, given the very real concerns expressed by residents about high levels of sexual assault and violence, particularly within Bewsey & Whitecross.

What does he mean 'strangers' - does he himself refer to immigrants in this statement or the rapists and sexual criminals within our communities.

Cheshire Police statistics (June 2025) confirm that while overall crime may have decreased in some parts of Cheshire, levels of violent and sexual crime remain unacceptably high in Bewsey & Whitecross and Warrington town centre. These problems cannot be ignored or hidden behind political point-scoring.

Furthermore, I must note that despite repeated attempts, both as a candidate and now as a councillor, I have struggled to secure meetings with senior police officers and local community teams. I must ask whether this is because I represent Reform UK?

I therefore request that this email be brought to the attention of the panel currently investigating the original complaint, and that it is also treated as a formal complaint.

I do believe that Mr Price should stand himself down now, until such time that the relevant panel can conclude its investigation - it is very clear that Mr Price is biased and does not appreciate the serious role of a PCC to act for all residents of Cheshire not just residents who are for his own party.

Further information was requested from the complainant in relation to how specifically they thought that the Commissioner had breached his code of conduct. This information was provided on 19th August 2025.

Further to your email of 19 August 2025, and as requested by the Complaints Management **Sub-Committee**, I now set out precisely which sections of the Police and Crime Commissioner's Code of Conduct - I believe Mr Dan Price has breached, supported by local crime data.

1. Clear Breaches of the Code

In his Warrington Worldwide article (16 August 2025), Mr Price, acting in his official PCC role, made comments including:

"Reform clearly want to strike fear into the public."

"They must take the public for fools."

"...call this 'Lawless' campaign what it is – propaganda."

These statements constitute in my opinion:

Breach of General Obligation 8(a): Failure to treat others with dignity and respect.

Breach of General Obligation 8(c): Conduct bringing the Office into disrepute.

Breach of Use of Resources 9(b): Using the authority of the PCC role improperly for political purposes.

Breach of the Oath of Office: Failure to "serve all the people of Cheshire," by ridiculing and alienating Reform UK supporters.

Contravention of the Nolan Principles (Respect, Fairness, Leadership).

2. Evidence of Misrepresentation

The PCC stated that crime in Cheshire has been "falling for the third year on the bounce" and that Cheshire is "the safest county in the Northwest."

Yet data from [Police UK](#) shows the opposite trend in my wards:

Bewsey & Whitecross – crime rose from 129 cases in May 2025 to 184 in June 2025.

Warrington Town Centre – crime rose from 143 in Feb 2025 to 190 in Apr 2025 and 185 in May 2025.

Violence and sexual offences dominate, accounting for nearly half of all reported crimes locally (92 in Bewsey & Whitecross, 80 in Town Centre, June 2025).

The table below sets out the monthly recorded crime totals in Bewsey & Whitecross and Warrington Town Centre (July 2024 – June 2025). The figures show a clear upward trend in 2025, with both wards recording their highest levels in June. This demonstrates that while the PCC has claimed crime is falling, residents in these areas are experiencing the opposite, particularly in relation to violent and sexual offences.

3. Requested Action

Given the seriousness of these breaches, I respectfully request that the Sub-Committee:

1. Recommends the suspension of Mr Price from his duties as PCC pending full investigation.

2. If suspension is not within the Panel's powers, I request at the very least that the PCC be required to issue a formal public apology to:

The people of Warrington, referencing my communication on my behalf of the residents, I represent.

Residents of Bewsey & Whitecross and Warrington Town Centre,
Supporters of Reform UK.

3. Issues a public report making clear that the PCC's comments were unacceptable and incompatible with the standards of his office.

4. Conclusion

The PCC has a statutory duty to act impartially and represent all residents of Cheshire. By using his public office to make partisan attacks and misrepresent local crime realities, Mr Price has undermined trust in his role and breached the standards of his office.

I respectfully request that this submission is considered alongside the original complaint under reference PCP04/2025, and that the Sub-Committee requires the PCC to be suspended or, at the very least, to issue a formal public apology to the people of Warrington and Reform UK supporters.

Response to complaint 3



Dan Price
Cheshire
Police & Crime
Commissioner

Police & Crime Panel

Sent via email:

Dan Price
Police & Crime Commissioner
Office of the Police & Crime Commissioner
2nd Floor
Runcorn Town Hall
Heath Road
Runcorn
WA7 5TD

Date: 28th August 2025

Our Ref:

Tel:
01606 364000

Email:
cheshire-pcc.gov.uk

Dear Martin

RESPONSE TO COMPLAINT

I am responding to your emails dated 19 and 20 August, which raise a further complaint against the Commissioner. This response has been discussed with the Commissioner and is issued on his behalf.

To be clear: this complaint appears to largely repeat issues that have already been addressed. Accordingly, much of this response will reiterate previous points, but by necessity provide a little more detail in response to the more specific points subsequently made.

Let me state unequivocally for the Sub-Committee's consideration: Police and Crime Commissioners (PCCs) are elected officials, typically affiliated with political parties. While the Commissioner remains committed to impartiality in his official duties, he retains the right - as does any elected representative - to engage in political discourse in a personal capacity. This is a cornerstone of democratic representation and applies equally to councillors and MPs. It is also important to note that the Commissioner regularly meets with elected officials from across the political spectrum in communities, at his office and also virtually.

To be clear, the Commissioner will continue to make political comments in a personal capacity as an elected Labour politician.

The complaint appears to hinge on comments made in *Warrington Worldwide*, suggesting the Commissioner is disregarding his own Code of Conduct. This is incorrect. The Commissioner is fully entitled to express personal views, and political affiliations are both expected and legitimate in his role. It is not unusual for PCCs to reflect their party's manifesto or appear in national party broadcasts and in doing so, will be introduced as 'the Police and Crime Commissioner for....'

Regarding alleged breaches of the Code of Conduct: there is no evidence that obligations under 8(a) or 8(b) have been violated. Furthermore, the complainant, perhaps rather conveniently, misrepresents 9(b), quoting “using the authority of the Commissioner improperly...” when the Code clearly states “using the resources of the Commissioner improperly...” - a materially different standard. The statement in question was made in his personal capacity and not assisted by the office.

The claim that the Commissioner breached his oath of office by “ridiculing and alienating Reform UK supporters” is baseless. There is no such language in the article cited.

The complaint also references the Nolan Principles, citing ‘Respect, Fairness and Leadership’. Only ‘Leadership’ is one of the seven principles. The Commissioner has demonstrated leadership by providing clarity on crime realities in Cheshire and countering misinformation, something which he is justified in doing in his role.

On the matter of alleged data misrepresentation: the Commissioner referenced full-year crime statistics across the force area, which is standard practice. Crime fluctuates seasonally, and cherry-picking two months of data does not constitute a valid trend analysis. The statistics cited by the complainant are publicly available on the Constabulary’s website and are accurate (see below) but do not evidence a trend of increasing crime over a statistically significant period.

Crime levels in your area

Crime for last year



Data for Bewsey & Whitecross July 2024-June 2025 (Source: Cheshire Constabulary website)

Analysis of the last 3 years from the same website also shows the following (declining) level of crimes for the Bewsey & Whitecross area:

April – June 2023	526 crimes
April – June 2024	501 crimes
April – June 2025	448 crimes

To suggest, therefore, that the Commissioner is 'misrepresenting' data is refuted as the annual data does indeed show a fall in crime across Cheshire, although it is recognised that some areas will have more challenging data. The comments referenced - regarding the statistical likelihood of sexual offences being committed by individuals known to the victim - reflects the sad reality of the prevalence of domestic abuse in our communities today. These remarks do not trivialise the severity of such crimes but rather provide necessary context.

In summary, and for the Sub-Committee's consideration, we can find no credible evidence of any breach of impartiality. Demands for the Commissioner to resign are unfounded and would undermine democratic policing governance in Cheshire.

Concerns from the complainant about access to Constabulary senior officers and community teams fall outside the Commissioner's remit and therefore this response. These are operational matters for the Constabulary, which functions independently of the Commissioner's office, and should therefore be addressed to the Chief Constable directly.

Finally, it may be worth questioning whether the complainant has themselves breached their own Councillors' Code of Conduct. If this complaint was submitted via a Warrington Borough Council email address in their capacity as a councillor and "on behalf of Reform UK," it raises serious questions.

Section 7.2 of the WBC Code prohibits the use of council resources for political purposes unless directly related to official duties. It is unclear how this complaint aligns with the complainant's role or the functions of the local authority, particularly, when it states it is submitted 'on behalf of Reform UK.'

I trust this response will assist the Sub-Committee in reaching a prompt and informed decision. The Commissioner has also indicated that he would be more than happy to personally attend the Sub-Committee to respond to any of the allegations detailed in this and other complaints if they would find that helpful. In the meantime, should you require any further clarification, please do not hesitate to contact me directly.

Yours sincerely

Chief Executive
Office of the Police & Crime Commissioner

