

Specified Information Order

Complaint handling

01/04/24 to 31/03/25

Specified Information Order

Complaint handling 2024-25

The Police and Crime Commissioner

Statement of assurance

“One of the – if not the very most – important parts of my role as Police and Crime Commissioner is to be the voice of the people in policing, and one of the ways that I get feedback from the public about how well they are being served by Devon and Cornwall Police is through my oversight of police complaints.

In addition to this oversight, in cases where complainants are dissatisfied with their complaint’s outcome, my office also has a role in law to review the way in which complaints against the police have been handled and finalised,

In my statement that introduced last year’s Specified Information Order report, I wrote about my disappointment regarding the standard of the force’s complaint handling. Because of this, in the year that followed, I increased the amount of oversight that my office and I were applying to this important area of work, to try bring about improvements on the public’s behalf. In addition to this, to help ensure that the resources and structure of the police’s relevant teams were correct, I also made an additional £500,000 available to the force to be used as an investment in their Professional Standards Department, the team that deals with public complaints, to support improvements in the service.

This report is a retrospective review, covering the period from the beginning of April 2024 to the end of March 2025, and I think it is important to set this report against the wider context of what was happening during this period; Devon and Cornwall Police were still in the ‘engage’ process (this often referred to as ‘special measures’) of His Majesty’s Inspectorate of Constabulary, Fire and Rescue Services (HMICFRS), our newly appointed Chief Constable had only been in post for a short time, and the force was facing a wide range of difficult, competing demands.

That said, in relation to the handling of complaints against police, I am encouraged to see that some improvements have started to happen. In particular, although late on in the year, work to reduce the backlog of complaints has started, and through new leadership, an increase in personal contact is being made with complainants.

The appointment of Chief Constable James Vaughan in late December 2024 has also brought about a sharper internal focus to the issues at hand, and I take comfort in knowing that the Chief Constable is as committed to improving matters as I am.

These are all positive signs, however I am clear that these improvements need to happen at a greater pace, and I can see that a lot of work remains to be done before a sustainable, high standard of service is achieved. Should this not be possible, I will review all of the options available to me, including either considering adopting an alternative approach to police complaint handling, or asking HMICFRS to provide assistance, in my efforts to bring about a better service for our communities.

As such, I will continue to apply strong oversight and scrutiny to the way in which Devon and Cornwall Police deal with complaints from the public, and I will do everything in my power to help ensure that the quality of service received by the people of Devon, Cornwall and the Isles of Scilly reaches and stays at the standard that they require to have confidence that their complaints are being taken seriously.”

Alison HERNANDEZ

Police and Crime Commissioner

for Devon, Cornwall and the Isles of Scilly

Specified Information Order

Complaints handling 2024-25

Contents:

- Part one:** The Police and Crime Commissioner and police complaints
Part two: Force assessment of their complaints handling performance
Part three: Office of the Police and Crime Commissioner (OPCC) assessment

Part one: The Police and Crime Commissioner and police complaints

1. Introduction

- 1.1 This report has been prepared to meet the requirements of The Elected Local Policing Bodies (Specified Information) (Amendment) Order 2021.
- 1.2 In Devon, Cornwall and the Isles of Scilly, the Police and Crime Commissioner ('the Commissioner') has given Notice to the Chief Constable that model 1 will be adopted in accordance with paragraph 13A of the Policing and Crime Act 2017. Two other models for complaint handling are available to the Commissioner (models 2 and 3) which allow for her to take an increased role in the police complaint system by bringing complaint handling (but notably, not complaint investigation) into her own office.
- 1.3 Under model 1, the Chief Constable is the Appropriate Authority and has sole responsibility for the conduct of the officers and staff under his direction and control, as well as all matters relating to operational policing. This responsibility includes handling and dealing with complaints and dissatisfaction arising from the conduct of officers and staff, and from the service provided, this included the logging, recording and investigation of complaints, together with keeping complainants informed with progress and decisions relating to their dissatisfaction.
- 1.4 The Commissioner has three main duties in relation to police complaints. These are:
 - i. To act as the Appropriate Authority in relation to complaints about the Chief Constable,
 - ii. To hold the Chief Constable to account in providing an effective and efficient complaints process, and
 - iii. To be the Relevant Review Body for police complaints that meet certain criteria.
- 1.5 This report will provide information relating to the resources and processes that have been put in place to meet these duties, and will detail how the Police and Crime Commissioner is fulfilling her duties in relation to police complaints.

1.6 This report does not contain details of individual complaints nor complaint reviews dealt with either by the police or the Office of the Police and Crime Commissioner (OPCC).

2. Legislation

2.1 The relevant legislation is:

- The Police Reform Act 2002, Schedule 3.
- The Police Reform and Social Responsibility Act 2011, Section 1 para 8 (ca) (which includes the exercise of the Chief Constable's functions under Part 2 of the Police Reform Act 2002 in relation to the handling of complaints).
- The Policing and Crime Act 2017 (which includes provisions to amend Part 2 and Schedule 3 to the 2002 Act).

3. Statutory duties

3.1 Appropriate Authority for complaints about the Chief Constable

3.1.1 The Commissioner is the Appropriate Authority for complaints about the Chief Constable, and the Independent Office for Police Conduct (IOPC) is the Relevant Review Body for Chief Constable complaints.

3.1.2 No public complaints about the Chief Constable were received within this reporting year.

3.2 Duty to hold the Chief Constable to account in providing an effective and efficient complaints process

3.2.1 The Chief Constable is the Appropriate Authority for all complaints made about officers, staff and services under his direction and control. This duty has been delegated to the Deputy Chief Constable (other than for complaints about the Deputy Chief Constable) and carried out by the Force's Professional Standards Department, unless otherwise directed by the Chief Constable.

3.2.2 The Police and Crime Commissioner has a duty to ensure that the Chief Constable has an effective and efficient police complaints system in place. The Commissioner discharges this duty in a number of ways:

- Through monthly meetings with the Chief Constable and his Executive, at the Commissioner's Accountability Board (CAB), chaired by the Commissioner. Where appropriate, the Commissioner publishes assurance statements at the conclusion of each CAB meeting.
- Through a newly developed Board, the Police Conduct Oversight Board (PCOB) which has an explicit focus on police complaints and misconduct.
- Through quarterly meetings with both OPCC and police portfolio strategic leads at the joint Professional Standards and Ethics Board.

- Via regular, informal meetings between OPCC and PSD complaint managers and practitioners.
- Via unscheduled 'insight' scrutiny by the Commissioner's Accountability and Standards team.
- Through the statutory OPCC complaint review process, also undertaken by the Commissioner's Accountability and Standards team.

3.2.3 The police's response to the scrutiny questions asked of it by the OPCC (as guided by the Specified Information Order) is contained in Part 2 of this report.

3.2.4 The police's complaint function is further scrutinised by both the Independent Office for Police Conduct (IOPC) and His Majesty's Inspectorate for Constabulary and Fire and Rescue Services (HMICFRS). Reports of their scrutiny activity and findings are available on their respective websites.

3.2.5 The Commissioner has a process in place to action police complaints received by her office, with complaints logged onto OPCC systems, before being referred to the force's Professional Standards Department (PSD). By exception, complaints about senior officers, or complaints that feature elements of unusual or high risk, are routed from the OPCC to PSD via the Chief Constable's office.

3.3 Relevant Review Bodies for police complaints

3.3.1 The Policing and Crime Act 2017 made a number of changes for complaint handling by both the police and the Police and Crime Commissioner, with the Commissioner's role in the process strengthened.

3.3.2 The Act introduced new mandatory duties, and allows the Commissioner to choose between three options regarding the extent to which her office is involved in complaint handling. These are known as models 1, 2 or 3.

3.3.3 In Devon, Cornwall and the Isles of Scilly, the Commissioner has currently opted for model 1.

3.3.4 Resultantly, from February 1, 2020, the IOPC and the Police and Crime Commissioner became what is known as the 'Relevant Review Bodies' to deal with reviews arising from relevant complaints recorded by Devon and Cornwall Police. The police continue to be responsible for logging, recording and investigating complaints, and for keeping complainants informed.

3.3.5 The IOPC is the relevant review body where:

- (i) The Appropriate Authority is the Police and Crime Commissioner
- (ii) The complaint is about the conduct of a senior officer (an officer holding a rank above Chief Superintendent)
- (iii) The Appropriate Authority is unable to satisfy itself, from the complaint alone, that the conduct complained of (if it were proved) would not justify the bringing of criminal or disciplinary proceedings or would not involve an infringement of a person's rights under Article 2 or 3 of the European Convention on Human Rights

- (iv) The complaint has been, or must be, referred to the IOPC
- (v) The IOPC is treating the complaint as having been referred (also known as the 'power of initiative')
- (vi) The complaint arises from the same incident as a complaint falling within ii-v above
- (vii) If any part of the complaint falls within ii-vi above.

3.3.6 In any other case not listed above, the Police and Crime Commissioner is the Relevant Review Body.

3.3.7 Within Devon, Cornwall and the Isles of Scilly, the Commissioner has delegated this duty to the OPCC Chief Executive Officer, and the function is managed and undertaken by the OPCC Accountability and Standards team.

4. Outsourcing reviews

- 4.1 The Commissioner also contracts a specialist, external company ('Sancus Solutions') to undertake a number of Devon and Cornwall's complaint reviews. This company has been subject to national vetting and verification, and is used by several OPCCs across the UK.
- 4.2 Within Devon, Cornwall and the Isles of Scilly, this outsourcing allows for increased resilience, and enables the OPCC to increase its capacity to undertake complaint reviews according to demand.
- 4.3 The OPCC retains overall responsibility, and selects which reviews are appropriate for outsourcing. The OPCC undertakes all initial validity checks, and ensures that all relevant material is accessible to the external reviewer. Quality assurance is also undertaken by the OPCC on every complaint review finalised externally, prior to notification to the complainant.

5. Contents and publication

- 5.1 In relation to holding the Chief Constable to account, the national guidance recommends that that the Specified Information Order includes the following (Devon and Cornwall Police's self-assessment is attached at part 2):
 - How the force is measuring complainant satisfaction.
 - Progress updates on implementing relevant recommendations made by the IOPC and/or HMICFRS in relation to complaints handling, or where recommendations were not accepted an explanation as to why.
 - A summary of any mechanisms put in place to identify and act on themes or trends in complaints.
 - A summary of systems in place to monitor and improve performance in the timeliness of complaints handling.
 - The number of written communications issued by the force under regulation 13 of the Police (Complaints and Misconduct) Regulations 2020 where an investigation has not been completed within a "relevant period".

- Quality assurance mechanisms in place to monitor and improve the quality of its responses to complaints.
- Details of the administrative arrangements the Commissioner has put in place to hold the Chief Constable to account for complaints handling e.g. frequency of meetings and a summary of discussions.

5.2 In relation to the OPCC's performance in carrying out complaint functions, the national guidance recommends that the Specified Information Order includes the following (the OPCC's self-assessment is attached at part 3):

- The timeliness of complaint reviews e.g. the average time taken to complete reviews
- Details of which review functions the PCC has delegated and what measures they have taken to ensure quality, integrity and impartiality
- Quality assurance mechanisms the PCC has established to ensure that review decisions are sound and in line with the requirements of the complaint legislation and IOPC statutory guidance
- How the PCC assesses complainant satisfaction with the way in which they have dealt with complaints.

5.3 In accordance with The Elected Local Policing Bodies (Specified Information) (Amendment) Order 2021, this information and report will be published on an annual basis on the Devon and Cornwall Police and Crime Commissioner's website, against a timeframe set by the IOPC.

6. Complaint and complaint review statistics

In summary:

- In 2024-25, Devon and Cornwall Police:
 - Recorded 1354 complaints from the public.
 - Reached an outcome in 892 complaints of which 525 were in turn eligible for review.

Further detail can be found in part 2 of this report.

- In 2024-25, the Office of the Police and Crime Commissioner for Devon, Cornwall and the Isles of Scilly:
 - Assessed 102 new requests for complaint reviews.
 - Concluded 141 complaint reviews (including those received in 2023-24).
 - Upheld 47 reviews, with 66 not upheld (of review requests assessed as valid).

Further detail can be found in part 3 of this report.

7. Force performance

In relation to public complaints and the way in which Devon and Cornwall Police handles and deals with them, since the publication of the 2023-24 Specified

Information Order, the police have either planned or commenced a programme of work to improve their complaint handling performance.

With regard to the customer service provided to complainants, there is evidence that this has improved, mostly through an increase in PSD use of telephone contact (in 2023-24, personal contact was a noticeably absent).

However, a number of concerns either remain, or have been more recently identified. These include:

- A delay in addressing the backlog of complaints against the police awaiting initial logging/recording. As of March 2025, Devon and Cornwall Police had 1,300 complaints in this backlog queue.
- In the majority of complaint review cases, the police not adhering to the statutory 28-day requirement that it has, in relation to responses to the OPCC to recommendations made of it arising from upheld complaint reviews. In 2024-25 the average response time was 189 days.
- In the majority of complaints recorded, the police not notifying the OPCC of complaints taking in excess of 12 months to resolve. This 12-month reporting obligation is a statutory requirement.
- An ongoing lack of notifications from the police to the OPCC regarding outcomes and learning from complaints investigated by the IOPC, and IOPC complaint review outcomes and recommendations made.
- A lack assurance that the police are implementing and then maintaining recommendations made to it following upheld complaint reviews.
- The governance, quality control, management and record keeping of complaints dealt with outside of the Professional Standards Department remain unsatisfactory.

As such, although it is clear that a number of improvements have either been made or are planned in relation to the police's handling of public complaints, wider concerns remain regarding the quality and timeliness of Devon and Cornwall Police's complaint handling and further work is required to being about a sustainable, high standard of service.

Part two: Force assessment of their complaint handling performance

(note: Provided by Devon and Cornwall Police's Professional Standards Department in response to the five questions detailed in para 5 above, and published by the OPCC without further edit)

The Police and Crime Commissioner (PCC) and their office have a duty to publish certain information for the public and for that information to be frequently reviewed.

1) How the force is measuring complainant satisfaction

There have been substantial changes to the Professional Standards Department (PSD) in the past 12 months. This includes a restructure of the Public Service Team, including a newly appointed Head of Public Service and additional investment into the management tier within the team. The department have also created a Performance Analyst post which has enabled PSD to better capture and respond to complaint data themes and trends. The data compiled by the Performance Analyst is reviewed regularly by the Head of Professional Standards to ensure performance is tracked and monitored and remains on track. Since the recruitment of the Performance Analyst the department produce monthly performance reports which feeds into the monthly PSD Performance Board and the Quarterly Professional Standards & Ethics Board.

The Head of Public Service meets monthly with the operational team at the OPCC, providing a platform to run through complaint data and team performance. This relationship continues to be collaborative and open at all levels.

The Police and Crime Commissioner (PCC) previously requested that Devon & Cornwall police took greater steps to seek customer feedback. At the time of the recommendation the current staffing levels in the Devon and Cornwall Police complaints department did not allow for the collection of customer feedback. The subsequent recruitment of the Head of Public Service and the expansion of the team has enabled us to explore opportunities to seek feedback from the public and those that have accessed our complaint process. From August 2025 there will be a mechanism in place for the public to provide feedback via a short anonymous survey. This will be made available through either an email link, or via a QR code provided on every complaint outcome letter. The feedback and effectiveness of these surveys will be monitored on a monthly basis and will feed into our PSD performance framework. We recognise that surveys do have certain limitations. Typically, voluntary surveys can suffer from selection bias, where those with strong opinions may skew the results from the general population, leading to an overrepresentation of extreme views. While the department anticipate relatively low participation rates, it does create an additional mechanism for the public to feedback on their experiences, which will help to drive internal improvements.

Alongside this work, the Head of Public Service is committed to meeting complainants face to face where possible, to listen to their feedback and

experiences. In addition, they will also be available by telephone to help resolve complaints and help build public trust and confidence.

The team intend to join the forces community reference groups which will provide a good opportunity to share the work we are doing to gain valuable insight and feedback from the various support groups across our communities. We look forward to reporting on the work we plan to do in this area in our next update.

Complainant satisfaction can also be monitored through the percentage of complainants who have received an outcome to their complaint handled under the police complaint and misconduct legislation, and who remain dissatisfied and request a review into the outcome of their complaint. The numbers of complaint reviews that are upheld by the OPCC or IOPC allows the police to understand whether dissatisfaction may be justified and where improvements should be made. It also provides a platform for learning and improvement which the force welcomes.

Furthermore, key performance indicators (KPIs) published by the Independent Office for Police Conduct (IOPC) can also be used as an indirect measure. These include the timeliness of contact with complainants, the number of review applications received as a percentage of overall complaints and the average number of working days to finalise allegations.

Police complaints information bulletin Devon and Cornwall Police (Q4) Report can be accessed [here](#).

IOPC quarterly complaints statistics for Devon and Cornwall Police can be accessed [here](#).

2) Progress updates on implementing relevant recommendations made by the IOPC and/or HMICFRS in relation to complaints handling, or where recommendations were not accepted an explanation as to why

There is a requirement for Chief officers and local policing bodies to publish recommendations made to them and their response on their websites clearly and easy for members of the public to find.

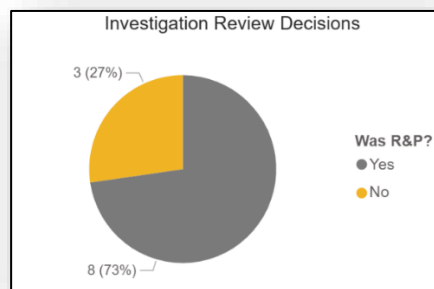
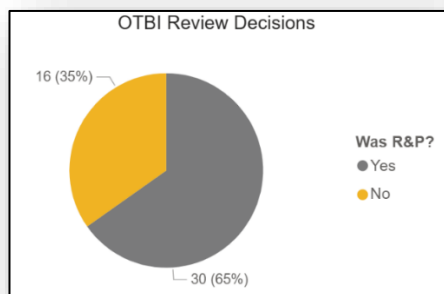
Where cases are investigated by the IOPC, the IOPC publish anonymised investigation summaries on the IOPC website. These will include an outline of the circumstances which prompted the investigation, evidence gathered and conclusions of the investigation. Learning recommendations arising from these are published [here](#).

National recommendations arising from super-complaints are updated [here](#).

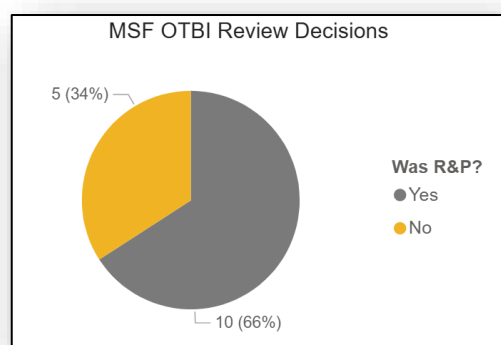
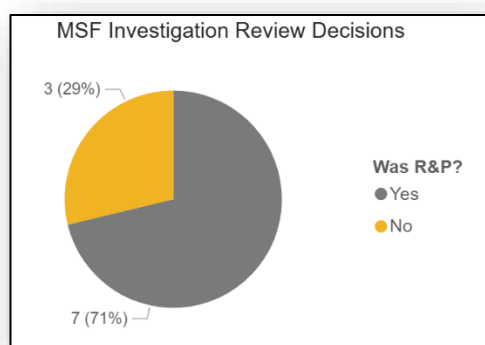
Recommendations go to the Chief Constable and are also shared with the OPCCs office. The OPCC can then hold the Chief Constable to account to ensure that the recommendations are responded to and implemented. The force gives the IOPC a narrative in response to any learning recommendations which is also shared with the PCC. There were no recorded learning entries for Devon and Cornwall police during this period.

Over the period 01/04/24 to 31/03/25, The IOPC reviewed a total of 57 reviews. Of these, 19 were upheld:

- 11 Investigation reviews, of these 3 (27%) were upheld
- 46 OTBI (Other than by investigation) reviews, of these 16 (35%) were upheld



The number of Devon and Cornwall police investigation reviews upheld by the IOPC remains consistent with our most similar force area (MSF), with 3 (29%) reviews upheld. The number of upheld OTIB (Other than by investigation) reviews are also in line with the MSF (34%) compared with 35% upheld locally.



HMICFRS Recommendations

His Majesty's Inspectorate of Constabulary and Fire Rescue and Fire Services (HMICFRS) routinely monitor progress against recommendations that they make to police forces in their inspection reports. HMICFRS visited the force in February 2025 to assess the effectiveness of Devon and Cornwall Police's PSD core functions which included, Complaint handling, Vetting, Investigation standards and counter-corruption arrangements. The HMICFRS Report is due to be published in September 2025.

In response to the preliminary feedback from HMICFRS in February 2025, related to how PSD handle public complaints, the department have made the following improvements.

- **The force needs to improve its timeliness in relation to its handling of public complaints**

There is now a dedicated supervisor for the caseworkers, this management has led to the reduction in the Inbox to approximately 50 a day, with complaints awaiting finalisations reduced to none. The complaints awaiting recording at the time of the report were isolated and have been worked on by a designated team.

Our ability to meet the current incoming demand is an ongoing challenge. The complaints department currently receive approximately 200 complaints a month and have implemented a focused resource for outside schedule 3 and those that are less complex resulting in a significant number of complaints being resolved in a timelier way. We are now focussing on ways to support the team and implement additional changes in processes to ensure the department can meet the demand for the Inside Schedule 3 and persistent, more complex complaints and complainants.

- **The force needs to improve the way it handles and manages complaints and allegations of misconduct**

The use of the Crime Management Investigation Team to service complaints directly from the Force Control room is a risk that has been identified. We are currently working towards implementing the Single Online Home form as the means of receiving complaints into the force which will ensure all complaints are received into PSD, ensuring greater compliance with Statutory Guidance.

We have been working with the Basic Command Unit's (BCU) Single Point of Contacts (SPOC) to increase complaint handling knowledge as well as looking to provide them limited access to Centurion.

The newly recruited Team Leaders have attended a Sancus course and have developed good working relationships with the Assessment Officers to increase their knowledge in respect of complaints requiring misconduct assessment or IOPC referral.

- **The force needs to improve its understanding of potential disproportionality in the handling, investigation and resolution of complaints and conduct matters**

Since March 2025 we have implemented the following scrutiny processes to ensure we are consistently reviewing our thresholds to ensure consistency of thresholds across our team and in line with national thresholds and home office statistics. A Bi-weekly threshold meeting is held with the team and Chief Inspector to peer review cases and gauge thresholds. There is open dialogue between our Appropriate Authority (AA) functions to discuss complexity and gauge opinion for any cases raised.

Assessment & determination decisions are dip sampled weekly by the PSD DI and feedback provided in each case.

PSD have initiated and chair a quarterly regional scrutiny panel for the South West forces which peer reviews cases enabling an on-going review of complex cases or cases with unusual circumstances to share learning.

The DI and Head of PSD are members of the national AA forum which meets quarterly to share new updates (IOPC & COP) and discuss thematic issues. Their

membership enables them to pose questions to other forces, sense check complex matters, and obtain guidance from those who may have experienced a similar issue.

The department de-briefs all misconduct hearings to review the end-to-end process and draw out the learning, this includes any feedback or learning from decision making.

The team have access to a range of subject matter experts who are actively used to assist with assessments whereby there is a specialism including use of force, Taser, firearms and driver training. This aids the quality of assessments and grounds them in any relevant APP (Authorised Professional Practice).

There is an on-going and detailed capture of performance data to 'temperature check' individual and departmental thresholds and compare against the annual Home Office published statistics. This data enables the department to track cases from initial assessment through to outcome, enabling decision makers to reflect on their decisions. It also enables the department to track the decisions and performance of individual staff.

All staff undertaking the AA role have received training to the National standard (HOPSD course). In addition, decision makers receive and review regular updates from the IOPC around national thematic (Police Perpetrated Domestic Abuse /Abuse of Position for a Sexual Purpose), best practice shared from other forces and changes in focus or process.

Several expected recommendations will likely be long term aspirations that the force is already working to achieve. The force looks forward to reporting on progress made in 2025/26. Most of the significant progress, and HMICFR response will be reported in next year's submission.

HMICFRS inspection coincided with a period of significant transformation for the department. This included a change in Head of Department, a newly appointed Head of Public Service in January 2025 as well as a significant investment in terms of resource across the team and increasing the reporting and visibility of this important function in PSD.

OPCC Recommendations

Following the restructure and full appointment of staff, this is an area of business that is expected to improve. A Benchmarking review was undertaken at the start of 2024 in response to an increase in public complaints and associated conduct matters over the last two years. The review concluded that staffing within the Professional Standards Department has not kept pace with the volume of work. As such, the executive agreed on several recommendations including further investment into the PSD structure. PSD have now finalised Phase 1 and 2 of their Benchmarking Review. The Public Service Team structure is established, but work continues to fill all posts to reach full establishment.

3) A summary of any mechanisms put in place to identify and act on themes or trends in complaints

Between 01 April 2024 to 31 March 2025 DCP logged 1,354 complaint cases¹. This is compared with 1,550 in 2023/2024.

The top 3 themes arising from complaint allegations were:

1. Delivery of service and duties – 58%
2. Police powers policies and procedures – 20%
3. Individual behaviours – 11%

PSD Have now finalised Phase 1 and 2 of their Benchmarking Review. The Public Service Team structure has been agreed with ongoing recruitment drives to fulfil all new and vacant posts. For the week ending 28 March 2025, the combined complaints backlog stood at around 1,300.

Between May 2025 and December 2025 all outstanding complaints will be dealt with by a dedicated team of police officers, additional to PSD resources. The additional resources allocated to drive down the complaint backlog demonstrates the forces commitment to complaint handling and providing a service to our communities. It is anticipated this will reduce to less than 400 by the next reporting period.

This additional resource will add an extra layer of resilience within the department to allow the newly created public service team to concentrate on managing new incoming complaints in a timelier way alongside making improvements over the coming year. Aiming to acknowledge and record complaints more speedily and use the telephone to help understand the public's concern and allegations. This in turn should allow us to resolve complaints more quickly.

All new incoming complaints will be dealt with by the recently established Public Service Team, led by the newly appointed Head of Public Service. During this reporting period PSD have experienced a month-on-month reduction in the total number of complaints awaiting case handling finalisation.

Following the implementation of the new structure and staffing uplift, PSD now carry out quality assurance checks, including dip sampling finalised complaints and identifying learning. Key Forcewide meetings are attended by PSD representatives, including Head of Public Service, to ensure wider learning across the force. The Head of Public Service is working towards a more formal way of implementing the learning from upheld reviews. This is being explored in conjunction with the Office of the Police and Crime Commissioner.

During Phase 2 of the PSD review (post this review period) an analyst was recruited. This has meant more meaningful review and interpretation of the data sources, enabling richer feedback internally to PSD, as well as to Governance oversight, such as within the PSD Performance Board, Professional Standards and Ethics Board, Force Exec Board, Commissioner's Accountability Board and Conduct Oversight Board.

Led by the Public Service Team Inspector and assisted by the analyst, the complaints department are developing a greater understanding of the complaints data and ways to proactively analyse to identify learning and early intervention and

¹ Data provided from the IOPC Police Complaints Information Bulletin: Devon and Cornwall Return (Q4 2023/24)

prevention opportunities. We look forward to sharing progress in the next reporting period.

The Prevention and Engagement function within PSD works closely with the force to embed wider force learning through central communications, training, monthly newsletters and CPD events.

The OPCC undertake reviews and highlight issues that arise in respect of complaint handling and identify learning for individual complaint handlers known as oversight issues. These can be for PSD directly or more widely across the organisation. The OPCC report these to PSD at the conclusion of a review and request that they are considered and that a response is provided to the OPCC as to how they will be addressed.

At present there has been a delay in a PSD response to this. However, following the implementation of the new structure and staffing uplift there will be greater oversight of the impact of organisational learning from themes arising from complaints.

4) A summary of systems in place to monitor and improve performance in the timeliness of complaints handling

The force holds a Quarterly Joint Professional Standards and Ethics Board to discuss performance, trends, and timeliness. A quarterly data pack feeds into this board, including an overview of PSD complaint data

The period of review concludes at the end of March 2025. The Public Service Team started in January 2025, towards the end of this reporting period. The impact of the introduction of the team and process structures will be more significant to report in the next period.

The reduction in the number of emails waiting to be reviewed and processed from the inbox has impacted on our ability to provide a timely acknowledgement of complaints. The introduction of Team leaders has also provided a dedicated resource responsible for triaging, assessing and allocating complaints. This has reduced the risks involved in delays identifying complaints that required a misconduct assessment and adds a system of workload management for the complaint handlers in the team. The intention for the workload management is to drive timeliness and apply a consistent understanding of what is reasonable and proportionate which will address both standards and timeliness.

This reporting period also saw the start of a drive to reduce complaints awaiting finalisation. This will significantly impact on the number of complaints showing as 'live' and therefore greatly improve data accuracy. Again, the progress report in this area will be more relevant for the 25/26 reporting period.

The queue of complaints awaiting recording had reduced within this reporting period by 179 from its peak in January 2025 reflecting the immediate impact the Public Service Team had on our capacity to deal with complaints and provides an insight into the impact the team will have had on timeliness when reviewed after 12 months.

We are still in a process of continued improvement and at the end of this reporting period further process changes were being explored and considered to improve both

flow and the pace at which complaints are processed. We look forward to being able to report the impact they have had.

5) The number of written communications issued by the force under regulation 13 of the Police (Complaints and Misconduct) Regulations 2020 where an investigation has not been completed within a “relevant period” (within 12 months)

Where Devon and Cornwall Police has not completed a complaint or conduct investigation within 12 months, they must issue a written notification letter to the PCC or the IOPC under Regulation 13 of the Police (Complaints and Misconduct) Regulations 2020. This letter is due at 12 months and every 6 months the matter remains live thereafter.

Providing retrospective data for the number of cases where there was a statutory obligation to report is challenging as it requires capturing on the relevant date therefore any attempt to provide such data at this time for a reporting period 12 months ago would be inaccurate. To provide context it is recognised that due to the demands on the department, there were gaps in our service from spring 2024 and extending beyond this reporting period. To ensure we are in a position to provide accurate data for the 25/26 reporting period we will shortly be conducting a data capture as of the end of March 2026.

The team have issued 8 timeliness reports during this reporting period, this is the figure for investigations not subject to special requirements and does not include those subject to special procedures as the responsibility for the reporting of those lies with the Investigators which would have similar challenges in terms of recovering the data for a period ending in March 2025.

Timeliness reporting and compliance thereof will be an area of future focus for us over the coming 12 months. The Head of Public Service has worked closely with OPCC and IOPC colleges to re-establish the timeliness of notifications.

One of the factors that has impacted on timeliness is the number of complaints awaiting finalisation. As of the conclusion of this reporting period there were 321 cases waiting to be finalised. This figure will include complaints across all three areas, outside schedule 3, and Inside Schedule 3 by Investigation and Other Than By Investigation. Whilst showing as ‘live’ on the data table they would not fall within the criteria for reporting as the investigation is complete. This is just one of the complexities involved in attempting to extrapolate data retrospectively.

In respect of finalisations alone and returning to the overall question of timeliness (4) there is a plan to allocate a dedicated resource to finalisations, and we anticipate a sizeable reduction in the coming months which will impact on data quality overall. It is anticipated by 2025/26 this will be part of business as usual, with less than 50 cases awaiting finalisations on a rolling basis.

6) Quality assurance mechanisms in place to monitor and improve the quality of its responses to complaints

If a complainant is not satisfied with the way their complaint was handled, they can submit a complaint review. Any recommendations or oversight learning identified by the OPCC or IOPC is used by the force to identify opportunities to improve the quality of its response to complaints.

During this review period there were limited methods of quality assurance, mostly relying on the SPOC's in the BCU's to quality assure the final letters being written to complainants. However, the structure of the Public Service Team has brought in an additional layer of management that allows for additional quality assurance dip sampling by the Team Leaders, with relevant learning fed back into the team.

Part three: Office of the Police and Crime Commissioner (OPCC) assessment

Introduction: Police complaint reviews

When a member of the public is dissatisfied with either how their complaint has been handled by the police, or with the outcome of the complaint, they have a right of review (effectively an appeal) either to the Office of the Police and Crime Commissioner (OPCC) or the Independent Office for Police Conduct (IOPC). The review body is determined by the nature of the complaint allegations and is set out in the Police (Complaints and Misconduct) Regulations 2020. This part of the report (part three) focuses solely on the reviews received and undertaken by the OPCC.

The aim of a review is to determine whether the police handling of the complaint and the complaint outcome was 'reasonable and proportionate'.

The OPCC undertakes the complaint review process by taking into consideration information provided to it by the complainant as to the reasons for their dissatisfaction, together with the information provided by the police force in relation to the complaint and the outcome reached. Where the OPCC complaint reviewer adjudges that either the handling of the complaint, or the outcome arrived, was neither reasonable nor proportionate, the review is 'upheld', and the Police and Crime Commissioner can make recommendations to the police to address matters.

In addition, where review bodies identify issues with how a complaint was dealt with, but these did not prevent a reasonable and proportionate outcome, these issues (known as 'oversight' issues) can be fed back to the police to assist with service improvement and organisational learning.

As part of the requirements of the annual Specified Information Order, the Police and Crime Commissioner undertakes an annual assessment of the performance of her own office in the delivery of this statutory function.

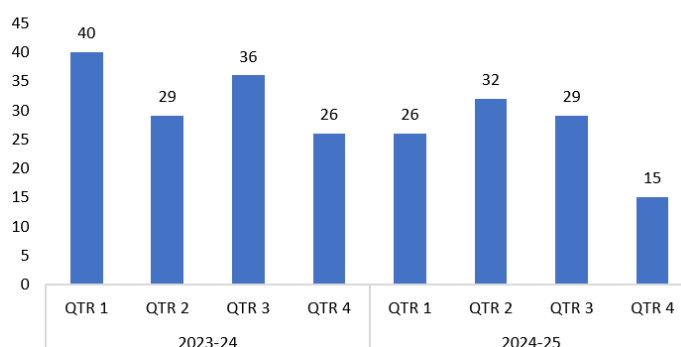
The overall assessment of performance for the year 1st April 2024 to 31st March 2025 is set out below.

1. Reviews received

In the last year, 1st April 2024 to 31st March 2025, the OPCC for Devon, Cornwall and the Isles of Scilly received 102 requests to undertake a police complaint review.

These are 29 fewer requests in comparison to the previous year, where 131 requests were received (-22%).

Number of review requests received by the OPCC in Devon and Cornwall: 2023-2025



The 102 review requests represent around 20% of complaints handled by Devon and Cornwall Police. In 2024-25, 1,354 complaints were logged by Devon and Cornwall Police, a decrease of 196 complaints when compared to the year prior (2023-24²).

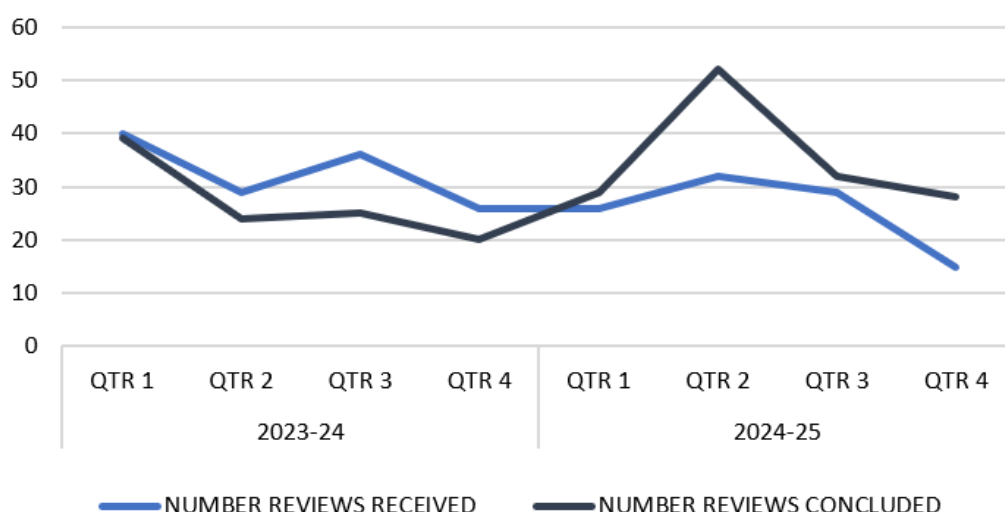
Of the 1,354 complaints logged, 525 (39%) reached a stage in the police complaint process where they were eligible for review by the OPCC. This is an increase of 56 complaints when compared to the previous year (469 in 2023-24).

2. Reviews concluded

The OPCC concluded 141 review requests in 2024-25³. This total includes a number of requests received but not completed within the 2023-24 reporting period, and equates to 33 more review requests concluded when compared to the previous year (+31%).

As the graph below shows, the OPCC consistently concluded more reviews than it received over the past 12 months, reversing the position of the previous year.

Number of review requests received and completed by the OPCC in Devon and Cornwall: 2023-25



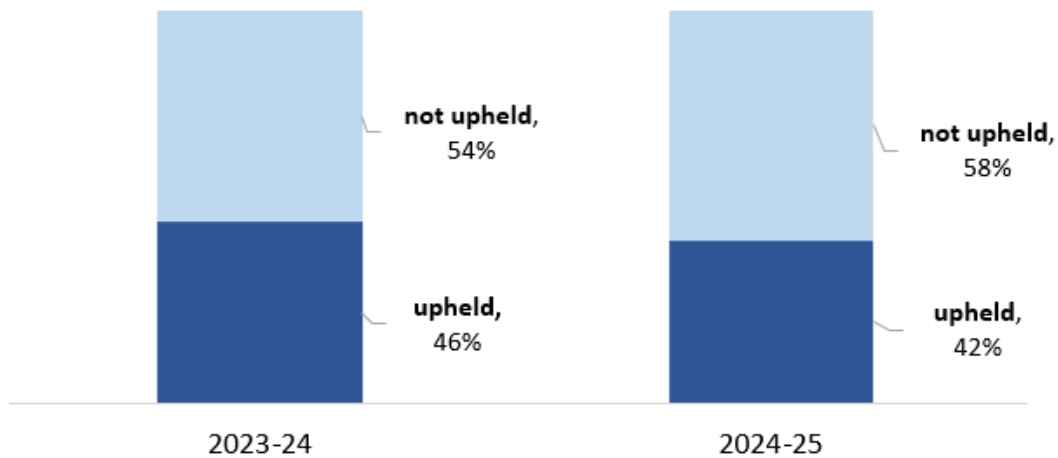
Of the 141 review requests received by the OPCC in 2024-25, 113 were assessed as valid or eligible for a review (80%).

Of the 113 valid reviews, 47 (42%) were upheld by the OPCC. This represents a numerical increase, but a slight percentage decrease on the previous reporting period (2023-24: 37 out of 80 (46%) upheld).

² Source: IOPC Police Complaints Information Bulletin: Devon and Cornwall

³ Including valid, invalid and withdrawn reviews and where the OPCC was not the correct review body. In the case of the latter, the request and relevant documentation are sent to the IOPC on behalf of the complainant.

Outcome of valid reviews conducted by the OPCC
in Devon and Cornwall: 2023-25



The number of invalid or withdrawn requests decreased by 3% in 2024-25, falling from 14% to 11%. The number of requests where the force were assessed as incorrectly determining the review body also decreased, dropping from 12% to 9%.

3. Average days taken to complete a review

In 2024-25, it took the OPCC an average of 127 calendar days to complete a review. This is an increase of 46 days when compared to previous year, where reviews were completed in an average of 81 days⁴.

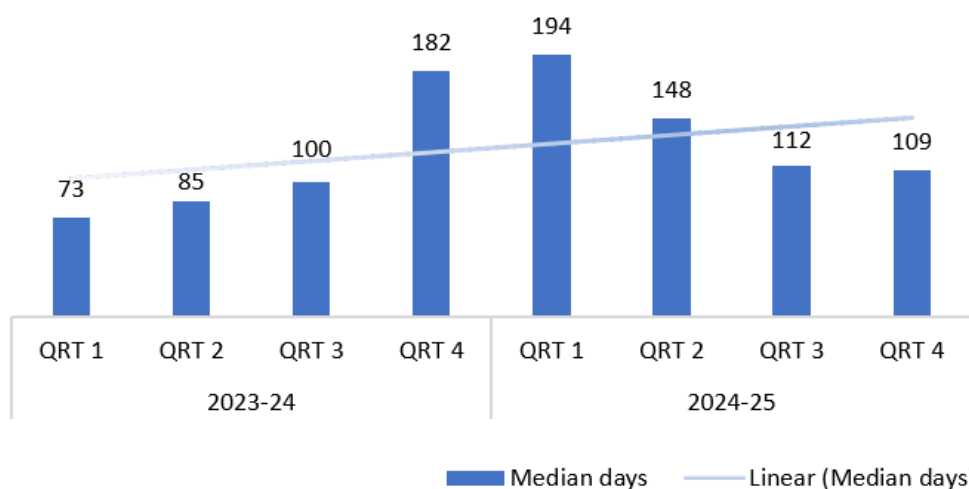
However, the time taken to complete complaint reviews fell quarter on quarter throughout 2024-25, starting at an average of 194 days in quarter 1 falling to an average of 109 days in quarter 4.

The extension in completion times is due to a number of factors, including the receipt by the OPCC of a number of unusually complex reviews, which results in more time required to complete each review. Additionally, delays in the receipt by the OPCC of complaint documentation from the Professional Standards Department (PSD), and the length of time taken by the force to respond to challenges in respect of incorrect review body decisions have also impacted upon completion timescales.

In the 2024-25 Specified Information Order, it was detailed how staffing levels impacted upon complaint review completion timeliness, but explained that the review team had recently been brought up to full capacity (two part-time complaint review officers) with the work queue being reduced. This has continued into 2024-25, and has contributed to the quarter upon quarter improvements in completion timeliness as detailed above.

⁴ Includes the time taken to respond to non-valid reviews and withdrawn reviews.

Average (median) number of calendar days taken for the OPCC in Devon and Cornwall to complete a review: 2023-25



(includes the time taken to respond to non-valid reviews and withdrawn reviews)

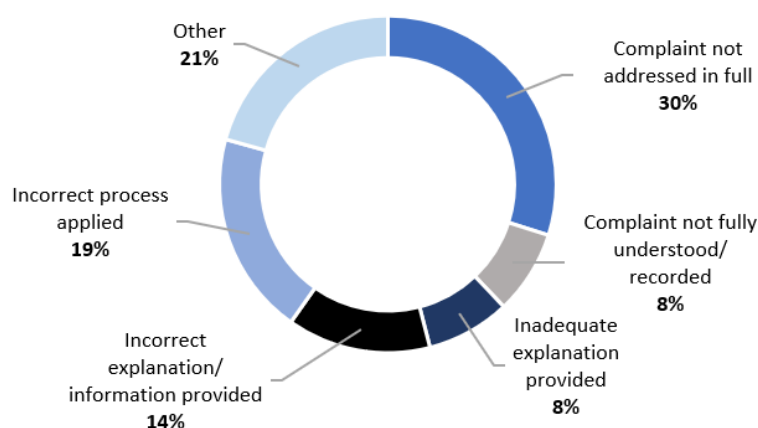
4. Upheld Reviews and Recommendations

When a review is upheld – either because the handling of the complaint and/or the outcome of the complaint were not reasonable and proportionate – recommendations are made to the force as to how matters should be rectified.

In the 2024-25 reporting year, 47 of the 113 (42%) eligible complaint reviews completed were upheld with the handling and/or outcome assessed as being neither reasonable nor proportionate. This represents a numerical increase, but a slight percentage decrease on the previous reporting period (37 out of 80; 46%).

The main reasons for complaint reviews being upheld in 2024-25 was the complaint not being addressed in full (30%), incorrect processes being applied (19%), incorrect explanations or information being provided to complainants (14%), the complaint not being fully understood by the PSD (8%), or an inadequate explanation being provided to the complainant (8%), alongside 'other' reasons (21%).

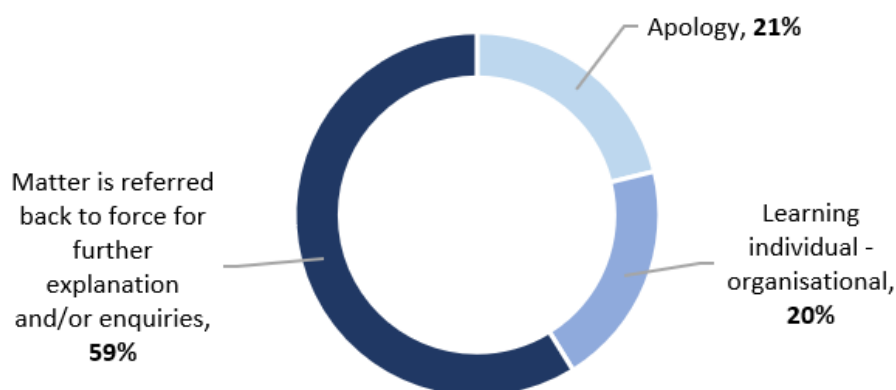
Reasons for upholding reviews: 2024-25



Compared to the previous year, there has been an increase in the proportion of complaints upheld owing to the complaint not being addressed in full, rising from 9% in 2023-24, to 30% in 2024-25. There has, however, been fewer reviews upheld because of incorrect processes being applied, dropping to 19% in 2024-25 from 45% in 2023-24.

In 2024-25, 87 recommendations were made to the force as a result of upheld complaint reviews. More than half (59%) recommended that matters be referred back to the force for further explanations or enquiries, with 21% recommending an apology, and 20% highlighting matters of organisational or individual learning.

Recommendations made against upheld reviews: 2024-25



By statute, the police have 28 days to respond to OPCC recommendations, detailing whether the recommendation(s) are accepted and what measures will be taken to implement them. If recommendations are not accepted, the police must provide a rationale as to why.

Of the 87 recommendations made to the force in 2024-25, 81 (93%) were accepted in full, 2 (2%) accepted in part, and 4 (5%) were not accepted.

In terms of timeliness, the force responded to just 2 (2%) of these recommendations within the statutory 28-day timeframe. This is a significant deterioration in performance in comparison to the previous year, where 37 recommendations were responded to within 28 days (56%).

The average time taken for the force to respond to OPCC complaint review recommendations over the past year was 189 days, against the statutory 28-day timeframe.

Given the Police and Crime Commissioner's ongoing concerns regarding Devon and Cornwall Police's complaint handling performance, the Commissioner's oversight and scrutiny of PSD has been further strengthened. This further strengthening has included requiring the Chief Constable to formally report on relevant matters at the new Commissioner's Accountability Board, and although not yet finalised within the reporting period covered by this report, the development of the Commissioner's new Police Conduct Oversight Board, at which regular performance reports will be

required to be formally presented by the force's Executives to the Commissioner for scrutiny by the Commissioner and her office.

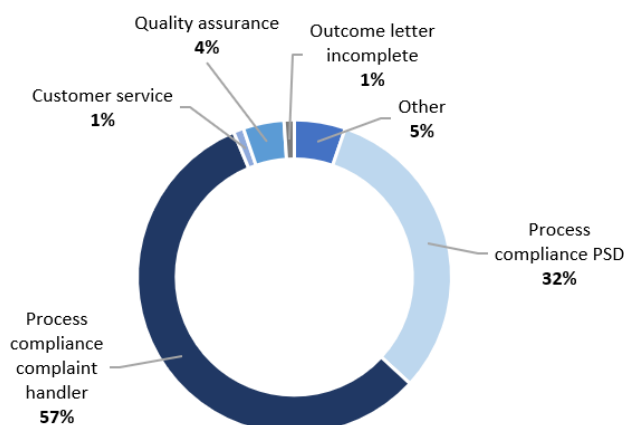
In addition to this closer scrutiny and more stringent oversight, as briefly referenced in last year's report, the Commissioner also made an additional £500,000 available to Devon and Cornwall Police, to enable the police in adding additional resources into the Professional Standards Department (PSD), to help bring about a better service to the public when making complaints against police.

5. Oversight issues

When 'oversight' issues are identified by the review officer within the OPCC, these are fed back to the force to assist with organisational learning and service improvements. In 2024-25, 95 oversight issues were identified by the OPCC and raised with the police.

The majority of these oversight issues (57%) related to a lack of process compliance by the complaint handler. A further 32% related to a lack of process compliance by the Professional Standards Department.

Oversight issues identified: 2024-25



6. The functions the Police and Crime Commissioner has delegated and what measures have been taken to ensure quality, integrity and impartiality

The Police and Crime Commissioner is committed to ensuring that the complaint review function undertaken by her office has integrity, is impartial, and provides a high quality of service. The Police and Crime Commissioner is also committed to ensure that review decisions are robust, and fully reflect the requirements of the Police (Complaints and Misconduct) Regulations 2020 and the IOPC Statutory Guidance for Police Complaint Reviews.

To ensure this, selected members of the Office of the Police and Crime Commissioner have been designated and trained in the undertaking of police complaint reviews.

When required, and in particular during times of high demand, selected complaint reviews are outsourced to an independent organisation that specialises in police

complaint reviews (Sancus Solutions). For all outsourced reviews, the OPCC retains overall responsibility, retaining the undertaking of initial validity checks, and ensuring that all relevant material is accessible to the external reviewer. Quality assurance is also undertaken by the OPCC on all complaint reviews that are finalised externally, prior to notification of the review outcome to the complainant.

7. Quality assurance mechanisms the Police and Crime Commissioner has established to ensure that review decisions are sound and in line with the requirements of the complaint's legislation and IOPC statutory guidance

The Police and Crime Commissioner is committed to handling complaint review requests and investigations with integrity by providing a fair, transparent, consistent and accessible approach.

Effective and transparent procedures have been established for the reasonable and proportionate handling of complaint reviews to meet both legislation and the IOPC statutory guidelines, with line management, internal monitoring and quality assurance measures in place.

8. How the Police and Crime Commissioner assesses complainant satisfaction with the way in which they have dealt with complaints

The Police and Crime Commissioner holds the Chief Constable to account for how policing services are delivered, including how the police handles, deals and responds to public complaints against police, ensuring that complaints are dealt with in accordance with the IOPC statutory guidance.

The outcome and analysis of complaint reviews undertaken by the OPCC, enables the Commissioner to assess levels of satisfaction, and also to identify where improvements could or should be made.

In the past year, the Commissioner has strengthened her oversight and scrutiny of complaint handling, to help better assess the standard of service being received by the public. This further strengthening has included requiring the Chief Constable to formally report on relevant matters at the new Commissioner's Accountability Board, and although not yet finalised within the reporting period covered by this report, the development of a new Commissioner's Police Conduct Oversight Board, at which regular performance reports will be required to be formally presented by the force's Executives to the Commissioner for scrutiny.

Additionally, as the voice of the people, through her office the Commissioner ensures that all correspondence that comes into the OPCC is monitored and logged, and where emerging trends or themes of dissatisfaction are identified they are either fed into the OPCC's internal 'Intelligence forum' where they are considered and assessed alongside all other relevant information received as part of the Commissioner's scrutiny role, or for more urgent matters arising, are raised directly with the Chief Constable.

Report end