



Annual report

2024

Upholding fairness, instilling trust

Service Police Complaints Commissioner Annual report 2024

This annual report is presented to Parliament pursuant to Regulation 7
of the Service Police (Complaints etc.) Regulations 2023



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Service Police Complaints Commissioner's foreword



This is my second annual report as the Service Police Complaints Commissioner (SPCC). My report is prepared for the Secretary of State for Defence. It is presented to Parliament pursuant to Regulation 7 of The Service

Police (Complaints etc.) Regulations 2023. The report covers the period 1 January 2024 to 31 December 2024. It reflects the progress in establishing the SPCC and the exercise of my statutory functions.

My role as the Commissioner is underpinned by a commitment to serve our Armed Forces and the public with independence, diligence and impartiality. We rightly hold our Armed Forces in high regard as they play a vital role in maintaining national security and supporting peacekeeping efforts globally.



I am focused on promoting the highest standards as we shape the future of oversight in Service Policing. Realising this vision requires sustained commitment to adequate resourcing, continuous professional development, and the adoption of technological innovation. These efforts will ensure the delivery of timely and fair justice for all.

It was an extremely busy year. I am grateful to my team for their dedication and professionalism in shaping and supporting the developments of the SPCC, which has been integral to the effective delivery of my role as the Commissioner. We received 31 referrals and initiated 14 independent investigations (before implementation of the SPCC, approximately two or three independent investigations were anticipated). The nature of these investigations includes dissatisfaction with Service Police investigations, sexual offences and death or serious injury. I have full oversight of all complaints and conduct matters within the Service Police complaints regime, including those not referred to the SPCC. This oversight is critical for building trust and confidence in Service Policing.

We engaged with the Independent Office for Police Conduct to ensure we took account of its experience and lessons learnt. Building from this, I intend to commission a comprehensive independent assessment of our operational protocols and evaluation methods. These will identify recommendations for best practice and highlight areas where further investment in staff and technological resources is essential. Every step taken contributes to a better understanding of our current capabilities and the challenges that remain.

During the year, I engaged with the Provost Marshals, among others, to actively listen to their concerns, ideas and aspirations. I will increase my engagement with the Provost Marshals to monthly meetings. This will ensure we capture any lessons from both sides, in 'real time'. In 2024, 18% of cases logged by the Professional Standards Departments (PSDs) were referred to me.

During the year I hosted a webinar to connect directly with the grassroots of Defence Diversity and Inclusion Networks. I also intend to extend the reach of my ambassadorial role to ensure our strategic messaging is heard and understood in all quarters. I want to hear about matters that concern our people on the frontline.

In my first annual report, covering June 2023 to December 2023, I made three recommendations. As the formal response from the Ministry of Defence (MOD) was not received during the current reporting period, it will be included in next year's annual report.

There was no formal implementation phase for the SPCC, and our access to resources has been limited. Nonetheless, responding to referrals was the priority, as well as putting in place systems to ensure that our investigative processes have been robust as we continue to raise the profile and capacity of the SPCC. My vision and three-year strategy were set out in my first annual report and will be reviewed annually.¹ The next review will focus on performance targets and success measures where appropriate.

I look forward to continuing to work with all our stakeholders, partners and the wider community to ensure that public trust and confidence in Service Policing are strengthened.

I am grateful to all those who have come forward to raise concerns and to the PSDs and respondents for their co-operation in responding to our investigations. Finally, complainants are an essential component in improving the Service Police complaints system.

Anyone wishing to provide me with information about any serious complaint or conduct matter on Service Policing is welcome to do so by writing to me at:

Service Police Complaints Commissioner
6th Floor Zone M
MOD Main Building
Whitehall
London
SW1A 2HB

Or by email to:

People-DPT-SPCC-enquiries@mod.gov.uk



Margaret Obi
Service Police Complaints Commissioner

¹ Service Police Complaints Commissioner Annual Report 2023, available at:
www.gov.uk/government/publications/service-police-complaints-commissioner-spcc-annual-report-2023



1

Introduction: structure and context

Structure of the report

This report covers the period 1 January 2024 to 31 December 2024 and provides an overview of activity in the Office of the SPCC.

This report will highlight the following:

- the context in which the Office of the SPCC operates
- the SPCC's regulation and governance
- the establishment of the Office of the SPCC
- data collection
- the super-complaints system
- priorities, a summary of recommendations and conclusion



The context: Service Police complaints system

The Professional Standards Departments

The Service Police operates within the Service Justice System. The Service Police complaints system is the responsibility of Service Police forces (see below) and is administered by them. Each force has a Professional Standards Department (PSD) who deal with complaints against the Service Police and allegations of misconduct. There are four Provost Marshals, each equivalent to a Chief Constable, who head up their respective Service Police forces.

The Service Police forces are:

- The Royal Navy Police
- The Royal Military Police
- The Royal Air Force Police
- Defence Serious Crime Command (DSCC)²

Specialist police forces such as the Ministry of Defence Police and the Civil Nuclear Constabulary come under the jurisdiction of the Independent Office for Police Conduct.

² The DSCC is the strategic command headquarters for the Defence Serious Crime Unit and was established in April 2022. The Defence Serious Crime Unit became operational on 5 December 2022 and incorporates the previous single Service Special Investigation Branches into a single unit, which investigates the most serious crime.

The SPCC

The Service Police (Complaints etc.) Regulations 2023 ('the Regulations') came into force on 19 June 2023, marking the commencement of a new statutory procedure for handling complaints.³ The independent Commissioner is responsible for overseeing the Service Police complaints system. Service Police complaints regarding incidents that took place prior to 19 June 2023 are not subject to the new statutory provisions. Instead, a separate non-statutory framework remains in place to address these complaints, and they should be referred to the relevant PSDs.

The Commissioner is supported by a small but dedicated team. This team is the operational arm, which manages the day-to-day administration of the statutory regulations, policies, processes, management and strategy. Further recruitment is anticipated as the Office continues to develop. Individual investigators constitute the investigative unit and are vested with the same powers as a Service Police Officer. The Commissioner makes independent decisions on referrals that are submitted by PSDs or complainants. These decisions are made without influence from the Service Police, MOD, government or public interest groups. Investigators act on the Commissioner's behalf to investigate the most serious complaints and incidents, including criminal investigations. The Commissioner's role involves setting the standards by which the Service Police handle complaints, as well as using insights from investigations to foster improvements in Service Policing practices. This work directly contributes to enhancing public confidence in the Service Police. The oversight function extends to approximately 3,000 Service Police Officers, which is comparable in scale to a medium-sized police force.

The SPCC's investigative approach prioritises a strong focus on what (if anything) went wrong, and what might prevent it happening again. This involves assessing training, management support, reform and organisational culture.

About the SPCC's investigations

Service Police forces are held to specific standards of professional behaviour, which are outlined in their respective Service Code of Conduct as well as the Service Police Codes of Practice. Allegations of misconduct (defined as a breach of the standards) may be raised by Armed Forces personnel, the public, or through internal concerns. Service Police forces are also legally required to refer certain matters to the SPCC, including a death or serious injury following contact with the Service Police.

Upon receipt of a referral, the SPCC makes an assessment to determine whether the matter should be investigated by the SPCC or referred to the Service Police force for internal review. This decision is based on the seriousness of the matter, the public interest, or whether it is a mandatory referral. If the investigation proceeds under the jurisdiction of the SPCC, a lead investigator determines the appropriate lines of enquiries, reviews relevant documents and records, examines forensics or digital evidence, and conducts interviews with involved parties, ensuring a thorough, impartial and proportionate investigation. The final decision rests with the Commissioner, who determines whether there is a case to answer (that is, whether misconduct or another course of action is appropriate). Once the investigation report is complete, it is submitted to the relevant Service Police force for further action, if necessary.

³ The Service Police (Complaints etc.) Regulations 2023, available at: www.legislation.gov.uk/ukxi/2023/624/contents/made

2

Regulations and governance

The Regulations

The Regulations, which provide the legal basis for the Commissioner's role, and the operations of the SPCC are complex. These Regulations essentially mirror the Police Reform Act 2002 (in particular, Schedule 3 thereof) and the Police (Complaints and Misconduct) Regulations 2020 (which govern civilian policing), adapting them for Service Policing while incorporating the specific requirements and nuances of Service law. This framework results in a regulatory landscape that is challenging to navigate.

The complexity is further heightened because there are four Provost Marshals and three distinct Service Police forces. The SPCC's statutory guidance, due to be published by the end of autumn 2025, will replace the current Joint Service Publication (JSP) 849 that provides guidance on the Regulations. The new guidance will provide much needed clarity on the roles, responsibilities, and procedures governing the handling of complaints and conduct matters in line with the Commissioner's expectations for clarity, accountability and consistent standards.

One of the Commissioner's key priorities for 2025 is to deliver biannual training to PSDs and Service Police on the SPCC Regulations. This initiative will ensure that those directly involved in policing and complaint handling are regularly updated on the latest regulatory expectations and best practices. There will also be several presentations on SPCC guidance to respective boards within the MOD, including the Defence Council, Navy Board, Army Board and Royal Air Force Board. These boards hold significant responsibilities, as reflected in the Regulations, particularly in matters involving complaints against a Provost Marshal, which should be handled by the respective Service board.

This training and engagement align with the Commissioner's priorities as outlined in their first report:

- to work with key stakeholders to improve the Service Police complaints system
- to improve Service Policing by identifying and sharing learning
- to improve confidence in Service Police accountability

By offering insights into the Regulations, these training sessions will help ensure that all stakeholders understand the requirement to support the SPCC in delivering a robust and high-quality service. This is particularly vital for the Armed Forces personnel, their families and wider public who place trust in Defence to provide safety and security at home and abroad. The SPCC provides a critical role in ensuring that Defence remains strong and effective in both domestic and international contexts. As the independent oversight body, the SPCC ensures that those who serve are held to the highest standards, allowing them to operate at maximum strength, knowing that accountability and integrity are paramount.

Recommendation

- 1 That the MOD prioritises and facilitates appropriate platforms to ensure the SPCC can inform stakeholders, including the Service boards, of their responsibilities under the Regulations.

Resourcing

The complexity of the Regulations requires sustained managerial and operational capacity to effectively deliver the requirements of the legislation. Chapter 1 highlighted the Commissioner's dedicated team and alluded to further anticipated recruitment to meet the statutory objectives of the SPCC. The SPCC has welcomed MOD's recognition of the need for an increased headcount, which was agreed towards the end of 2024.⁴ The ongoing operational needs of the SPCC will be kept under review.

Governance

Governance refers to the SPCC's framework of policies, processes, and oversight mechanisms that guide the SPCC's operations. It encompasses several key aspects. Effective governance is not just about managing daily operations – it is about serving as a steward of public trust. It involves creating an environment where the service is not only efficient and effective in its duties but also fair, accountable, and responsive to the needs of the communities served.

Parliament plays a role in that governance and accountability process. The Commissioner is ultimately accountable to Parliament and reports on performance through an annual report.

In collaboration with the MOD, the SPCC has been working to establish a governance framework. In addition, a programme of work is underway to develop the SPCC's internal processes which will include an accountability mechanism. This is to ensure enhanced scrutiny of the SPCC's operations, while also serving as a 'critical friend' by providing feedback and identifying lessons learned from investigations. In the interim, any issues

arising in relation to the SPCC have been escalated to the Commissioner for resolution as appropriate. The SPCC has adopted core principles that guide operations, underpinned by a Code of Good Practice, which is explained on page 11.

The pillars

The operational methodology of the SPCC is guided by five core pillars, which have been drawn from the Commissioner's three-year strategy, including the SPCC's mission and values. These pillars represent the foundation of how the SPCC will deliver its work and maintain the highest standards of accountability and professionalism.

- **Functional independence:** The SPCC must remain operationally independent to build trust, while collaborating effectively with its partners and stakeholders. The SPCC must not only act impartially but must also avoid the perception of bias. It is crucial that the SPCC is adequately funded to maintain independence. As an oversight body, the SPCC must have the necessary resources and spending authority to fulfil the duties outlined in the enabling legislation.
- **Assured investigations:** The SPCC is committed to ensuring that investigations are robust, thorough, and proportionate. All referrals undergo a triage and assessment process. SPCC lead investigators are experienced investigators holding at least PIP level 2 and are overseen by the management team within the SPCC.
- **Engagement and communication:** It is important for the SPCC to be approachable and attuned to the needs of both the grassroots and strategic levels of the single Services. To achieve this, the Commissioner engages monthly with the Provost Marshals and, through the SPCC, maintains regular engagement with PSDs.

⁴ A new role was filled in early 2025.

- **Risk management and transparency:** Effective governance requires the establishment of clear policies and procedures for managing risk, while ensuring transparency and upholding accountability. Without these, investigations are likely to be delayed.
- **Professionalism:** The SPCC is committed to upholding high standards of behaviour and fostering a culture in which staff feel highly supported, trusted, and empowered to suggest innovative solutions. The SPCC

aims to create an environment that promotes excellence and integrity in all aspects of its work, ensuring that the SPCC delivers value for money and achieves the highest standards of professionalism.

These pillars form the foundation of the SPCC's operations and are crucial to maintaining the integrity and effectiveness of the SPCC. By adhering to these principles, the SPCC aims to continue delivering robust oversight and accountability, ensuring that the Service Police remain accountable.



Code of Good Practice

The five core pillars detailed above generate the Code of Good Practice, which guides the actions and the decisions of the SPCC. In early 2024, the Commissioner delivered induction training to SPCC investigators and reviewers, highlighting the importance of working in line with the codes and expectations of the SPCC. Effective leadership is integral in establishing these expectations and ensuring they are met consistently.

The SPCC's Code of Good Practice is:

- **selflessness:** the Office and the SPCC's investigators act solely in the public interest
- **integrity:** the Office and the SPCC's investigators must avoid any actions or decisions that would result in personal financial or other material benefits for themselves, their family, or their friends – they are committed to transparency by declaring and resolving any conflicts of interest and maintaining independence from any person or organisation that may try to inappropriately influence their work
- **objectivity:** the Office and the SPCC's investigators must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias
- **accountability:** the Office and the SPCC's investigators must be accountable for decisions and actions and submit themselves to the scrutiny necessary to ensure this is upheld

- **openness:** the Office and the SPCC's investigators must act and take decisions in an open and transparent manner – information should not be withheld from the public unless there are clear and lawful reasons for doing so
- **honesty:** the Office and the SPCC's investigators must be truthful
- **leadership:** the Office and the SPCC's investigators must actively promote and robustly support the Code of Good Practice and be willing to challenge poor behaviour wherever it occurs

The Commissioner recognises that the work of the Office can be demanding, especially given that many individuals engaging with the SPCC are dealing with stressful or challenging events. Despite best efforts to always ensure fairness and professionalism, it is acknowledged that things can sometimes go wrong. To address this, a complaints procedure has been developed to ensure a consistent and fair way for individuals to raise a complaint about the SPCC.⁵ When a complaint or feedback is received, it is acknowledged promptly and an explanation of how it will be managed and resolved is provided to the complainant.

Through these principles and processes, the SPCC aims to foster a culture of continuous improvement and accountability, ensuring that the SPCC remains a trustworthy, transparent, and effective oversight body.

5 As of 2025, the SPCC's complaints procedure is more matured and will be available on the external website.



3

Office of the SPCC

Mission statement

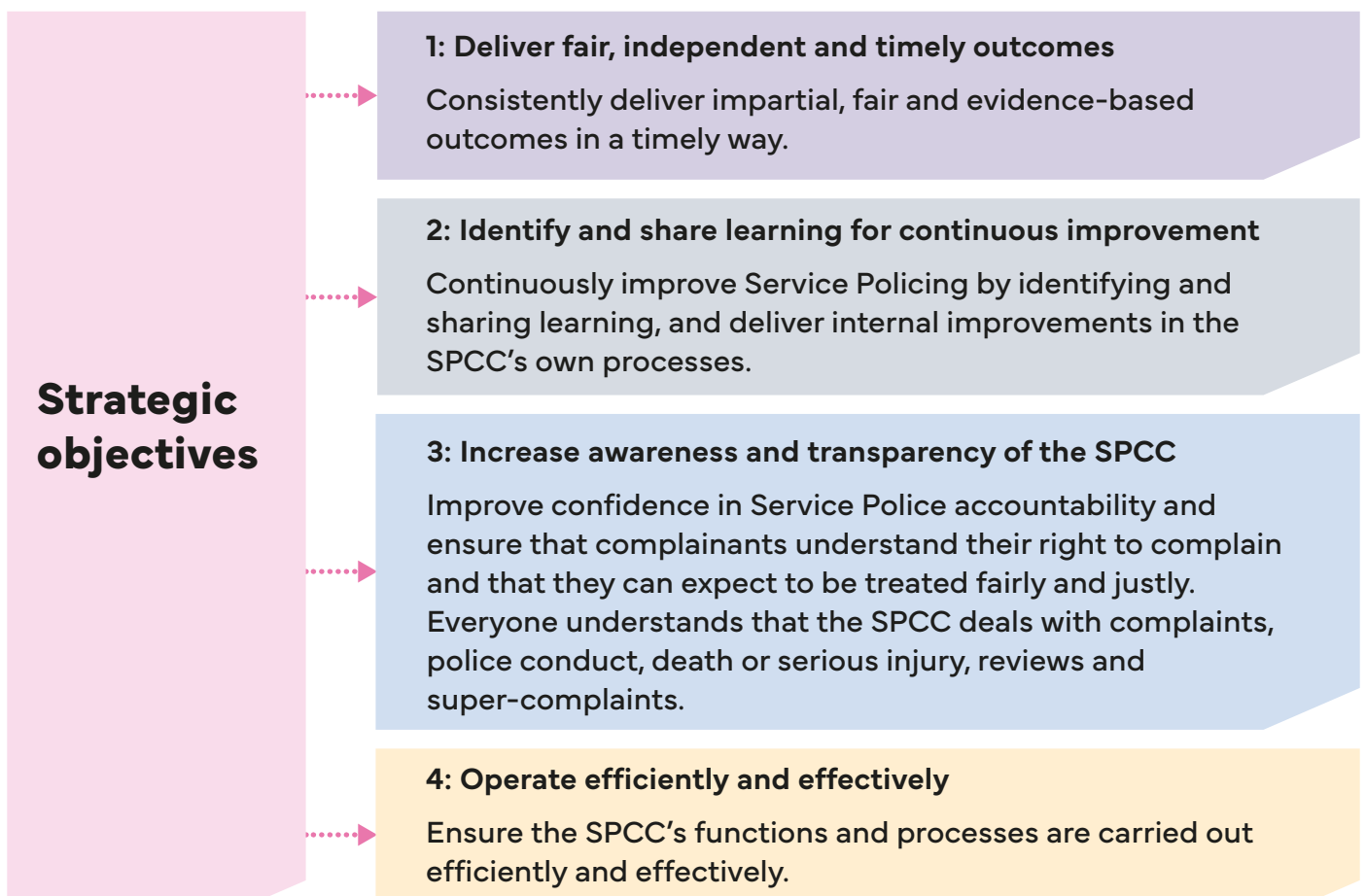
The Regulations provide the foundation on which independent oversight is delivered. The SPCC's first annual report reflected the strategy of the SPCC, which is reviewed annually in line with Regulation 6. The mission of the SPCC remains to secure and maintain the confidence of:

- persons subject to Service law
- persons subject to Service discipline
- the wider public

Drawing directly from this mission, the SPCC's strategic objectives for 2024 were developed to guide the work of the SPCC and reinforce commitment to transparency, accountability and continuous improvement.

Strategic objectives

Figure 1 below outlines the four strategic objectives and their respective definitions:



The strategic objectives set out four key goals that are essential to the successful delivery of the SPCC's mission. They also represent the foundation for the future development of performance standards, including key performance indicators (KPIs) to measure progress and impact.

Strategic risks

As with any Public Office, the SPCC faces a range of strategic risks that have the potential to impact the successful achievement of the strategic objectives. These risks have been identified and assessed in line with best practice and have been shared with the MOD as the sponsoring department. This is particularly important given that the Commissioner does not have the levers necessary to directly mitigate certain risks – for example, those relating to staffing.

Strategic risks are actively managed through a programme of mitigation and risk-reduction activities, designed to reduce their potential impact and likelihood. As the governance framework for the SPCC continues to mature, mechanisms for strategic oversight and scrutiny of these risks will be developed to ensure an independent and informed perspective on risk management.

The strategic risks include delays in investigations and external factors that threaten timely justice and public confidence. Additional strategic risks relate to organisational resilience and resourcing.

KPIs

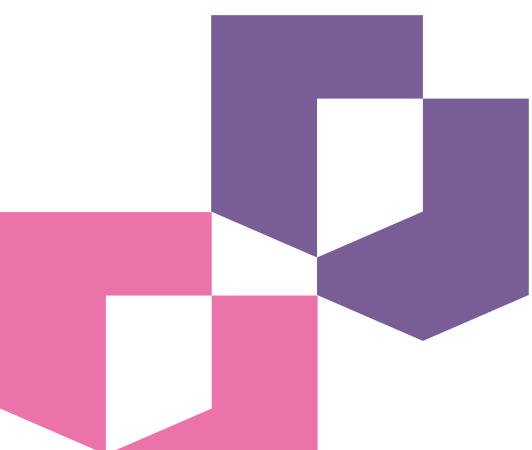
Given the relative infancy of the regulatory framework and the corresponding immaturity of available data, the SPCC has adopted a set of in-year interim KPIs. These interim measures serve as a practical starting point, providing early indicators of progress while more robust data collection and analysis capabilities are developed.

The long-term objective is to evolve these interim KPIs into a refined set of aspirational KPIs, aligned to strategic priorities and underpinned by reliable data. This will enable more meaningful performance assessment and drive continuous improvement across all areas of the SPCC's work. Table 1 provides a snapshot of the SPCC's KPIs. A full list can be found in the SPCC's strategic document.

Table 1

| Strategic objective | KPIs |
|--|--|
| 1. Deliver fair, independent and timely outcomes | <p>Description: Acknowledgement of case and Commissioner's decision on whether to accept or reject a referral within clear timeframes.</p> <p>Target:</p> <ul style="list-style-type: none">• 15 working days upon receipt (5 working days to acknowledge receipt and 10 working days for the Commissioner's decision)• Death or serious injury referrals within 96 hours <p>Responsible owner: SPCC</p> |

| Strategic objective | KPIs |
|---|---|
| 1.1 | <p>Description: Completion of independent/directed investigations.</p> <p>Target:</p> <ul style="list-style-type: none"> • 70% of independent/directed investigations completed within 12 months of the date they were referred to the SPCC <p>Responsible owner: SPCC</p> |
| 2. Identify and share learning for continuous improvement | <p>Description: SPCC recommendations are formally responded to, with documented outcomes and justifications where recommendations are not accepted.</p> <p>Target:</p> <ul style="list-style-type: none"> • 100% of recommendations responded to within 90 days of receipt <p>Responsible owner: Provost Marshals</p> |
| 2.1 | <p>Description: Ensure continuous improvement via interactive workshops.</p> <p>Target:</p> <ul style="list-style-type: none"> • Biannual workshops held with lead investigators and external stakeholders (e.g. Service Police, MOD) <p>Responsible owner: SPCC</p> |
| 3. Increase awareness and transparency of the SPCC | <p>Description: Assess the number of referrals.</p> <p>Target:</p> <ul style="list-style-type: none"> • Increased number of referrals to show increased awareness • 80% of referrals fall within the remit of the SPCC <p>Responsible owner: SPCC</p> |



| Strategic objective | KPIs |
|---|---|
| <p>3.1</p> | <p>Description: Respond to queries.</p> <p>Target:</p> <ul style="list-style-type: none"> • 100% of freedom of information requests sent out within legislated clearance times • Respond to PSD and stakeholder enquiries within 28 days <p>Responsible owner: SPCC</p> |
| <p>4. Operate efficiently and effectively</p> | <p>Description: Maintain a strong workforce.</p> <p>Target:</p> <ul style="list-style-type: none"> • 95% of posts in the SPCC are filled by the end of the calendar year • 100% of employees complete SPCC induction training within 12 months of their start date • 100% of employees believe they have the skills and support needed to do their job effectively <p>Responsible owner: SPCC</p> |

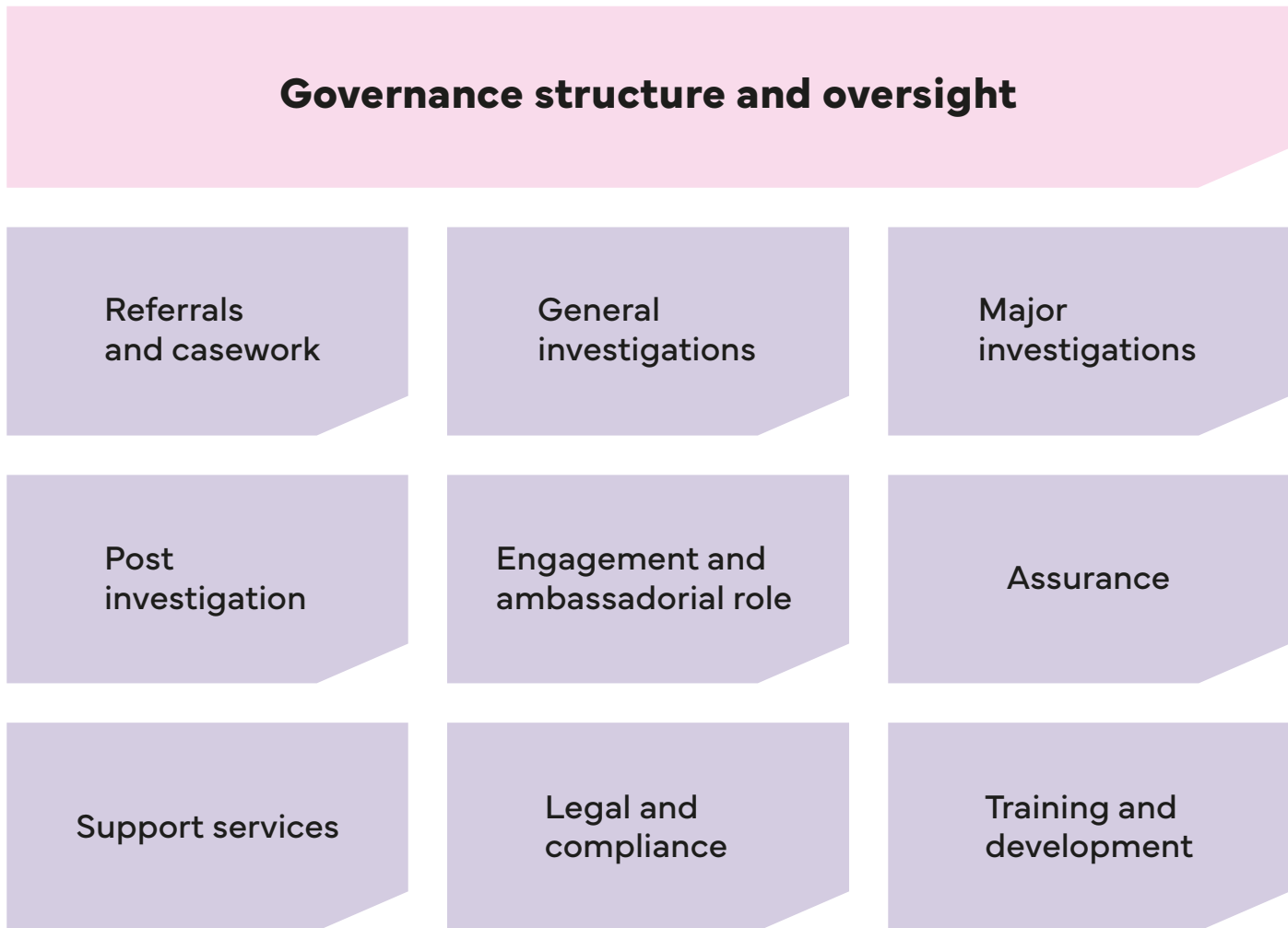
The successful delivery of the SPCC’s KPIs is dependent on adequate resourcing. As outlined in the strategic risk section, several identified risks (such as delays in investigations, non-compliance and limited organisational resilience) have the potential to hinder progress towards achieving the strategic objectives and associated priorities.

The current set of interim KPIs was formally approved at the end of 2024. As such, performance against these indicators will be assessed and reported on in the next annual report once a full year of operational data becomes available. This future reporting will provide a clearer picture of outcomes, challenges and areas for further improvement, forming a key step towards performance maturity and strategic alignment. Furthermore, the SPCC should have fully data-informed KPIs in the latter part of 2025.



Operation of the SPCC

The operation of the SPCC brings together the enabling Regulations and the strategic objectives into a coherent and functioning operational model. This operational model can be categorised into 10 broad areas as illustrated in the diagram below.



Investigations

In 2024, the SPCC undertook 14 independent investigations arising from 31 referrals. Further details and analysis of this activity can be found in the data section (see pages 19 to 29).

Investigations are a core function of the SPCC and are categorised as either general or major investigations.

General investigations encompass serious complaints and conduct matters including those involving potential criminal behaviour.

Major investigations are cases that can have strategic impact on Defence, including super-complaints.

Post investigation activities have emerged as a key area for development in the coming year. This includes the preparation of files and reports for third parties including Coroners and the Service Prosecuting Authority.

Engagement and ambassadorial role

Stakeholder engagement is critical to the effectiveness and visibility of the SPCC and developing partnerships. The Commissioner and the Office were pleased to meet with a wide range of stakeholders and partners, including:

- Single Service Families Federations
- Service Complaints Ombudsman for the Armed Forces (SCOAF)
- Independent Office for Police Conduct
- Police Ombudsman for Northern Ireland
- Police Investigations and Review Commissioner
- Garda Síochána Ombudsman Commission
- Ministry of Defence Police
- His Majesty's Inspectorate of Constabulary and Fire and Rescue Services
- designated bodies (though the Commissioner did not attend the designated bodies event in September)
- grassroot representatives and subject matter experts

In addition, the Commissioner hosted a webinar with diversity network chairs which served as a valuable platform to explain the role of the SPCC. It highlighted that there is often confusion between the SPCC's responsibilities and those of SCOAF.

To re-emphasise, the SPCC provides independent oversight of complaints and allegations of misconduct made against members of a Service Police force from the introduction of the Regulations in June 2023. This includes oversight of matters subject to mandatory referral – for example, investigations concerning the conduct of a Provost Marshal.

SCOAF oversees complaints made by current or former Service personnel who believe they have been wronged during their service – but does not cover complaints about the actions or conduct of the Service Police in their duty as police officers.

When the Office for the Armed Forces Commissioner is established, it will absorb the core functions currently under SCOAF.

Looking ahead, the Commissioner intends to continue expanding external engagement by:

- visiting military bases and units across the Services
- participating in existing communication forums with the single Services
- hosting roundtable events, focused on emerging areas such as domestic abuse, sexual offences, and discrimination

These efforts are vital to raising awareness of the SPCC's role and ensuring the complaints system is accessible, trusted and effective.



4

Data collection

Overview of cases: PSDs and the SPCC, 1 January 2024 to 31 December 2024

The collection of data is essential for understanding the nature of Service Police complaints and the types of cases referred to the SPCC. This section provides an overview of activity between 1 January 2024 and 31 December 2024, covering complaints, conduct matters, and death or serious injury matters that have been reported to the PSDs and/or referred directly to the SPCC. A variety of charts and graphs are included to offer insight into emerging trends and enhance transparency.

Disclosure and confidentiality statement

In compliance with the Office for National Statistics' statistical disclosure control policy, the MOD's JSP 200 directive on statistical disclosure control, and relevant provisions of the UK GDPR and Data Protection Act 2018, any figures that are fewer than three, or those that may lead to identification when combined with other data, have been suppressed. These measures are taken to safeguard the privacy of individuals. Secondary suppression may also be applied to further safeguard sensitive data.

Logging and recording complaints

Logging a complaint is the initial step, where basic information is captured (such as the complainant's details, the nature of the allegation, and the date of the complaint). Logging ensures that all complaints, including those that do not meet the criteria for formal investigation, are documented. This helps track expressions of dissatisfaction and identify trends that might not have reached the criteria for formal investigation.

Recording a complaint is a formal process and occurs when a complaint requires a detailed investigation under Regulation 12. Not all complaints need to be recorded, only those that meet specific criteria for formal investigation and potential disciplinary action.

A complaint must be recorded unless it falls under specific grounds for non-recording. Recording involves a thorough investigation, which may include witness statements, interviews and the analysis of evidence.

While logging allows for tracking trends and monitoring all complaints, recording ensures that serious allegations are identified and investigated. This supports accountability within the Service Police.

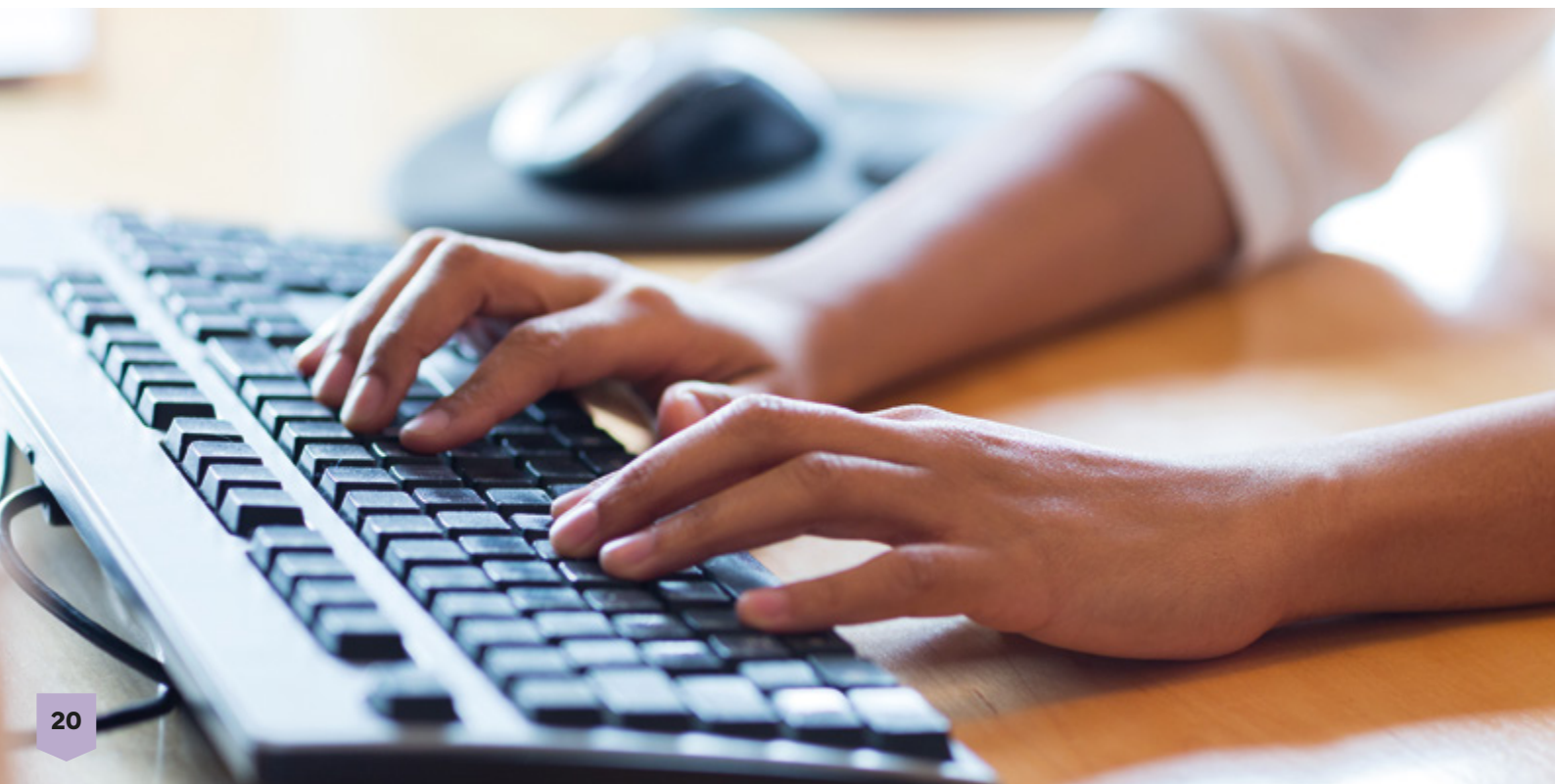
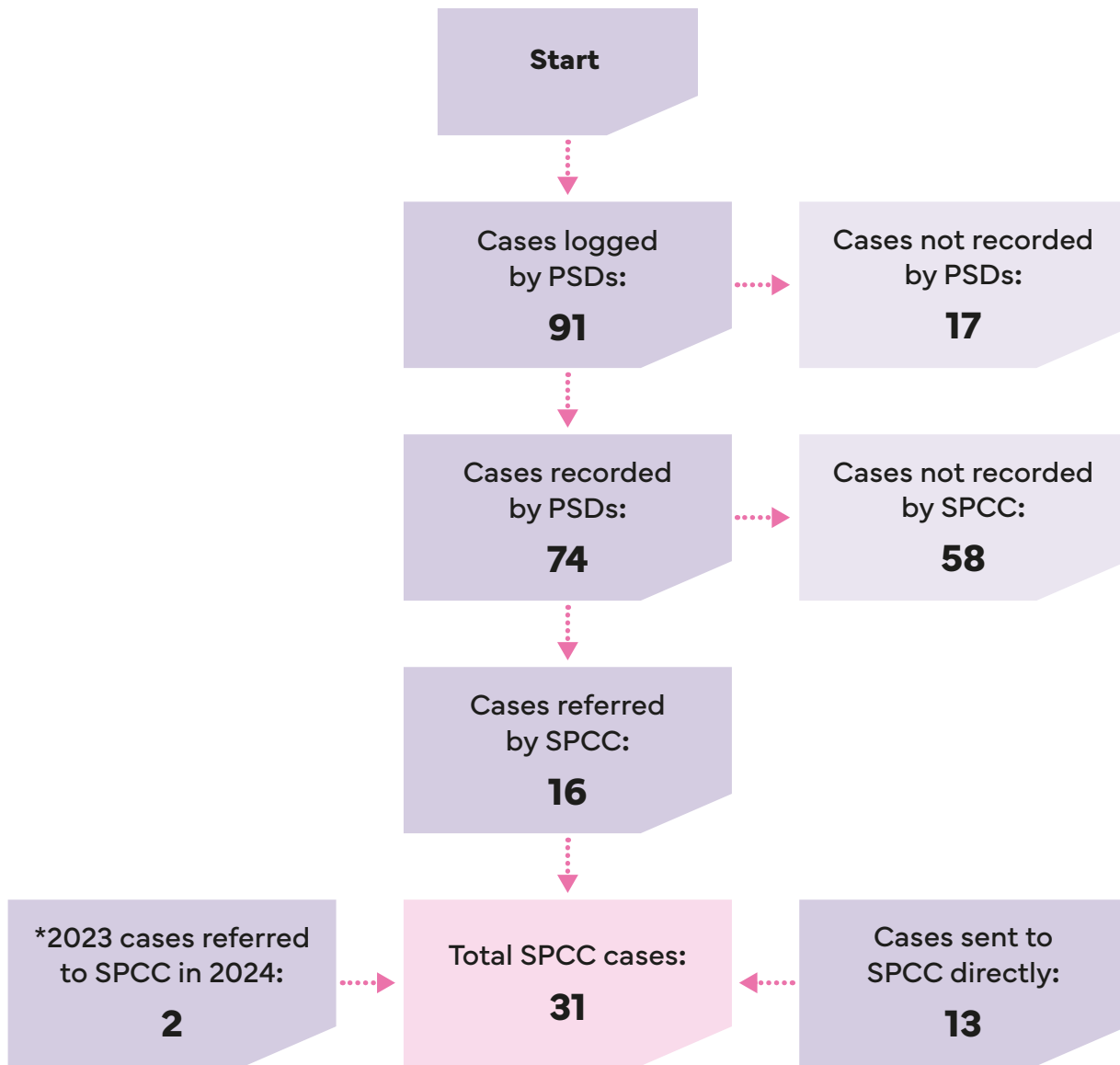


Figure 2: An overview of cases from the PSDs to the SPCC and cases that came directly to the SPCC, 1 January 2024 to 31 December 2024

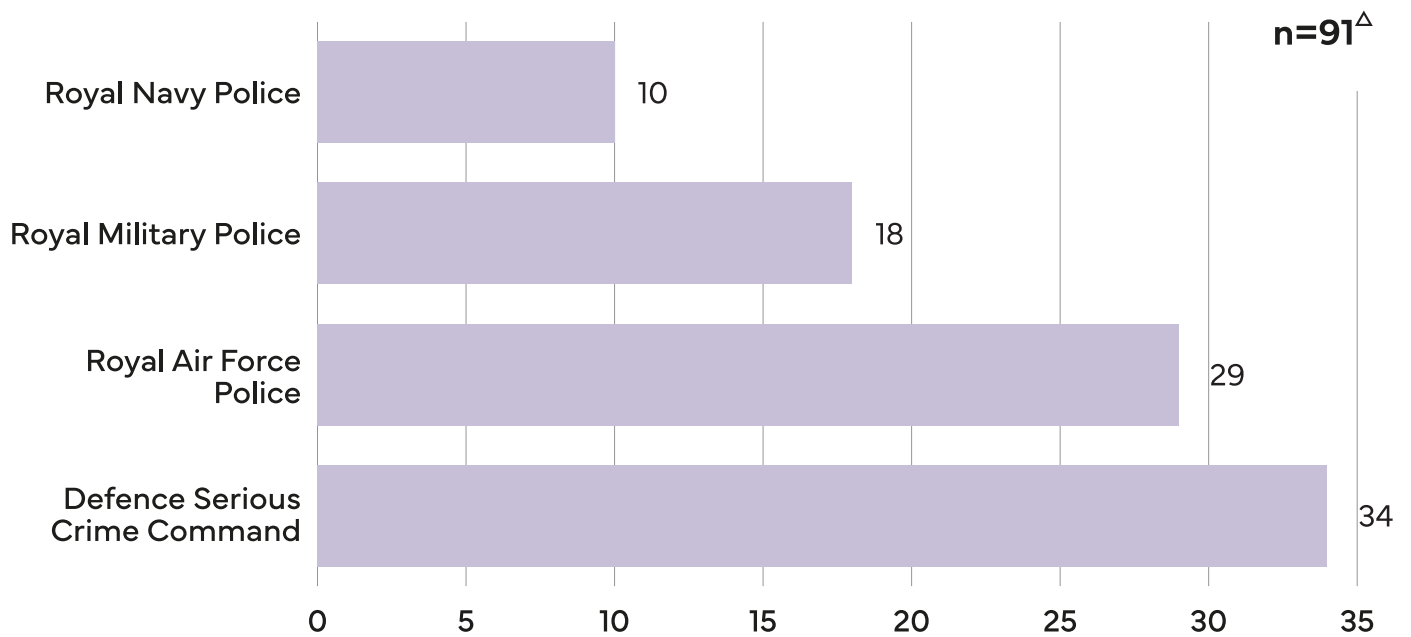
Figure 2 shows the journey of all cases received by the PSDs. In 2024, 18% of cases logged were referred to the SPCC. Cases logged include complaints, conduct issues, and investigations as a result of conduct issues.



*These cases were logged by their relevant PSD in 2023 and were referred to the SPCC in 2024.

The following figures offer transparency regarding how complaints are handled and support internal improvements.

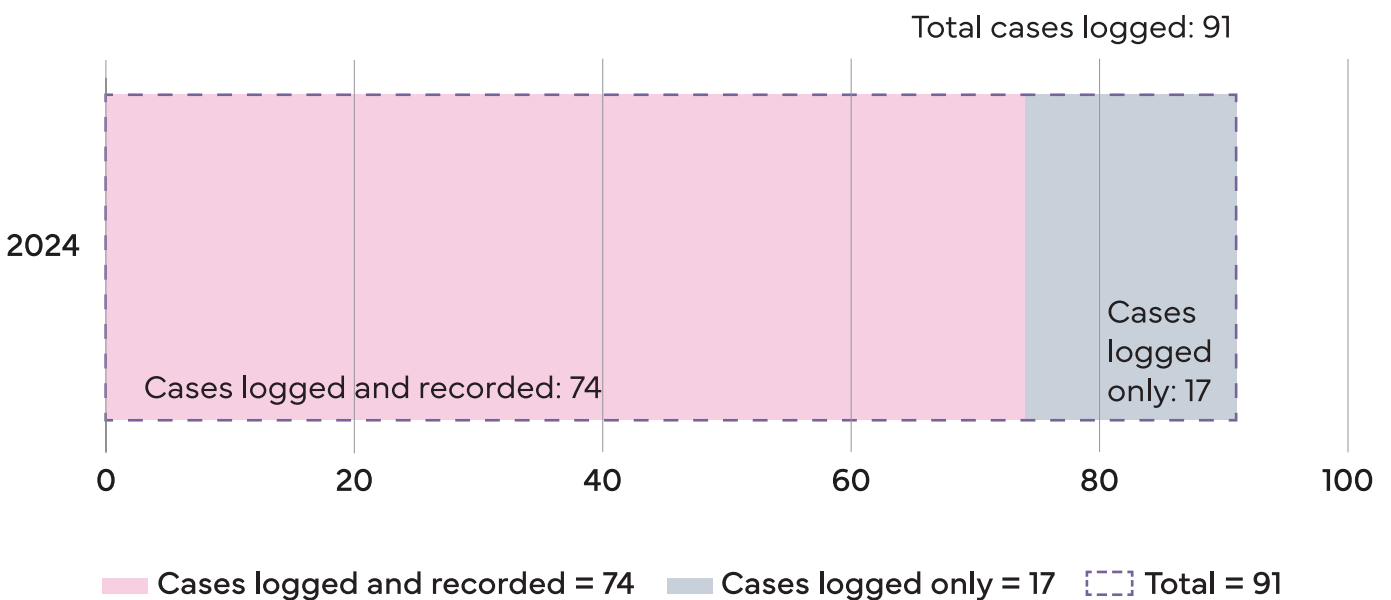
Figure 3: Number of cases logged by PSD, 1 January 2024 to 31 December 2024



△ n=91 indicates the number of cases included in this analysis

Of the PSDs, the DSCC received the most cases. They are responsible for investigating serious crime across all of the Armed Forces.

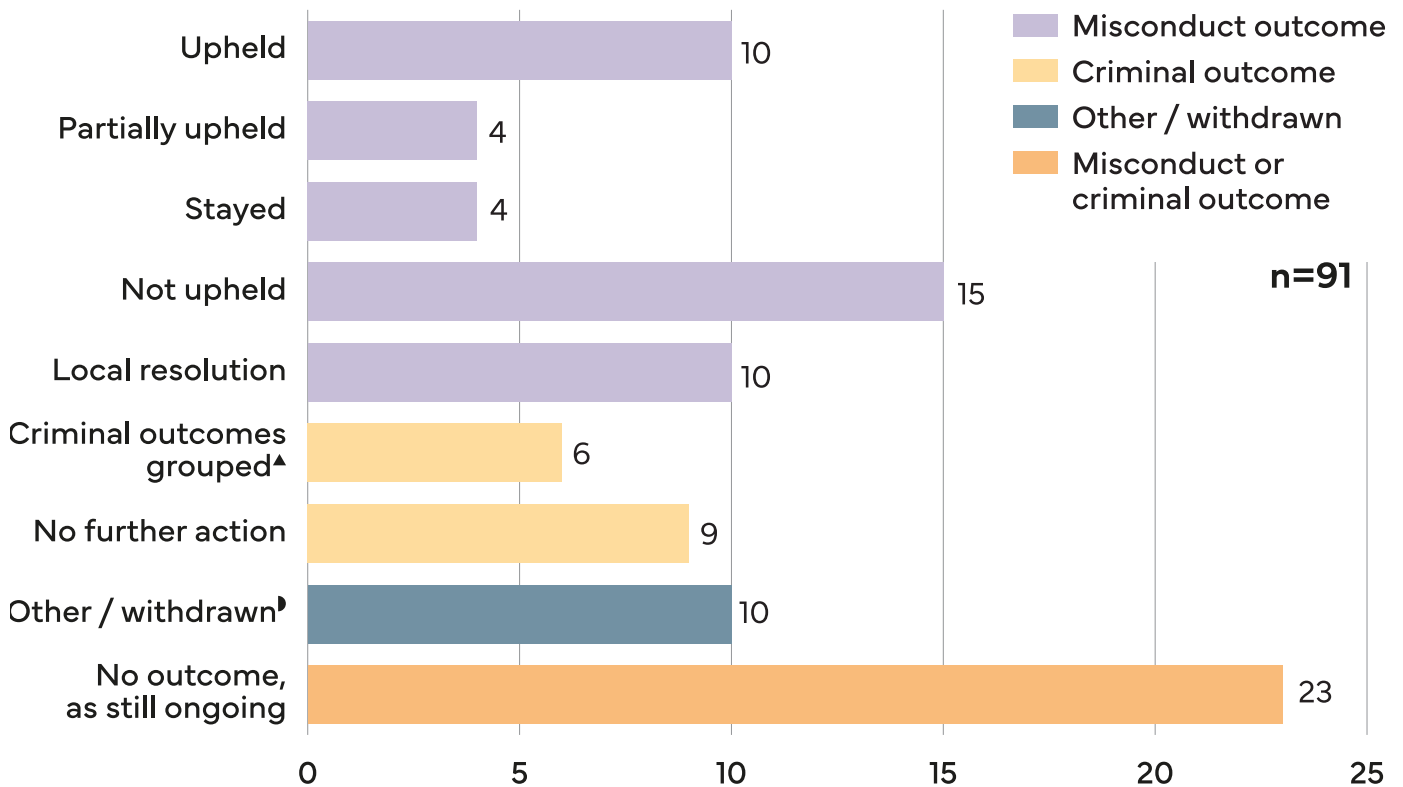
Figure 4: Number of cases logged and recorded, 1 January 2024 to 31 December 2024



Data from 2023 is not included, as it only covers 19 June 2023 to 31 December 2023. Therefore, it is not directly comparable to the complete dataset from 2024, which covers the full year.

As explained on page 20, not all cases logged go on to be recorded. This is often due to local resolution. In 2024, 91 cases were logged. Of these, 74 were recorded and 17 were not.

Figure 5: Number of cases logged by outcome and type, 1 January 2024 to 31 December 2024



▲ In line with the JSP 200 directive on statistical disclosure control, numbers fewer than three have been suppressed. Therefore, all criminal outcomes except 'No further action' have been grouped.

▸ In line with the JSP 200 directive on statistical disclosure control, numbers fewer than three have been suppressed. Therefore, withdrawn cases have been grouped with 'Other' outcomes.

Understanding the outcome of investigations can be helpful in unpacking the performance of PSDs. Aside from the category 'No outcome, as still ongoing', the largest category is 'Not upheld'.

The definitions for the outcomes are as follows:

| Outcome | Definition |
|---|--|
| <p>1. Upheld (misconduct outcome)</p> | <ul style="list-style-type: none"> • The complaint was found to be valid, and the allegation was supported by evidence. • Disciplinary or learning opportunities may follow, depending on the severity. |
| <p>2. Partially upheld (misconduct outcome)</p> | <ul style="list-style-type: none"> • Some parts of the complaint were proven, but not all aspects. • There may still be some form of action or recommendation. |
| <p>3. Stayed (misconduct outcome)</p> | <ul style="list-style-type: none"> • The investigation or complaint process has been paused or suspended, often due to legal reasons (e.g. ongoing criminal proceedings) or other priorities. |
| <p>4. Not upheld (misconduct outcome)</p> | <ul style="list-style-type: none"> • The complaint was not supported by the evidence, or it was found to be unsubstantiated. • No misconduct or breach of standards was identified. |
| <p>5. Local resolution (misconduct outcome)</p> | <ul style="list-style-type: none"> • The complaint was dealt with informally, without a full investigation. • This is often used for less serious issues, aiming for early resolution between the complainant and officer/department involved. |
| <p>6. Guilty (criminal outcome)</p> | <ul style="list-style-type: none"> • This refers to a finding or plea of guilt in a legal or Service disciplinary process. • An individual is charged and taken to the Military Court Service, and either pleads or is found guilty. |
| <p>7. Charged (criminal outcome)</p> | <ul style="list-style-type: none"> • A criminal charge has been formally brought against an individual by the Service Prosecuting Authority or the individual's Commanding Officer, following a referral by the Appropriate Authority. |

| Outcome | Definition |
|---|--|
| 8. Referred (criminal outcome) | <ul style="list-style-type: none"> • The complaint or matter has been passed on (referred) to another Appropriate Authority for further action. • For example, a case has met the Evidential Sufficiency Test, which is a Service Police threshold to refer a matter to the Service Prosecuting Authority or Commanding Officer. • A referral does not mean that an individual has been charged with an offence, but that the matter has been passed to the Appropriate Authority for consideration for charge. |
| 9. No further action | <ul style="list-style-type: none"> • The matter was investigated but no action is being taken, or the complaint does not on its face reveal a matter which necessitates an investigation. • This might happen due to insufficient evidence, the issue being too minor, or other factors that make formal action unnecessary. |
| 10. Other/withdrawn | <ul style="list-style-type: none"> • A miscellaneous category when the outcome doesn't fit neatly into the above. • This might include reasons like referrals to other bodies or internal actions not classified under the standard outcomes. |
| 11. No outcome, as still ongoing | <ul style="list-style-type: none"> • The investigation is not yet complete, so no decision has been made about whether the case is upheld or not. |

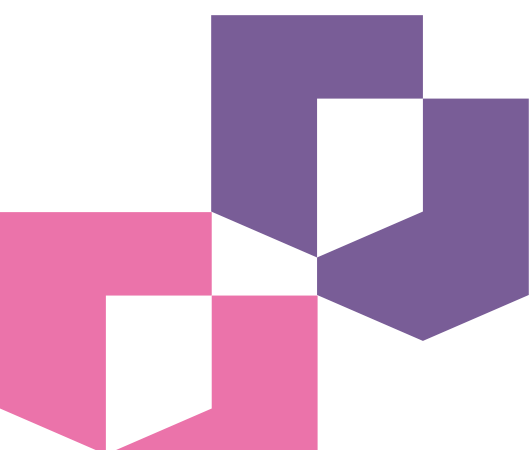
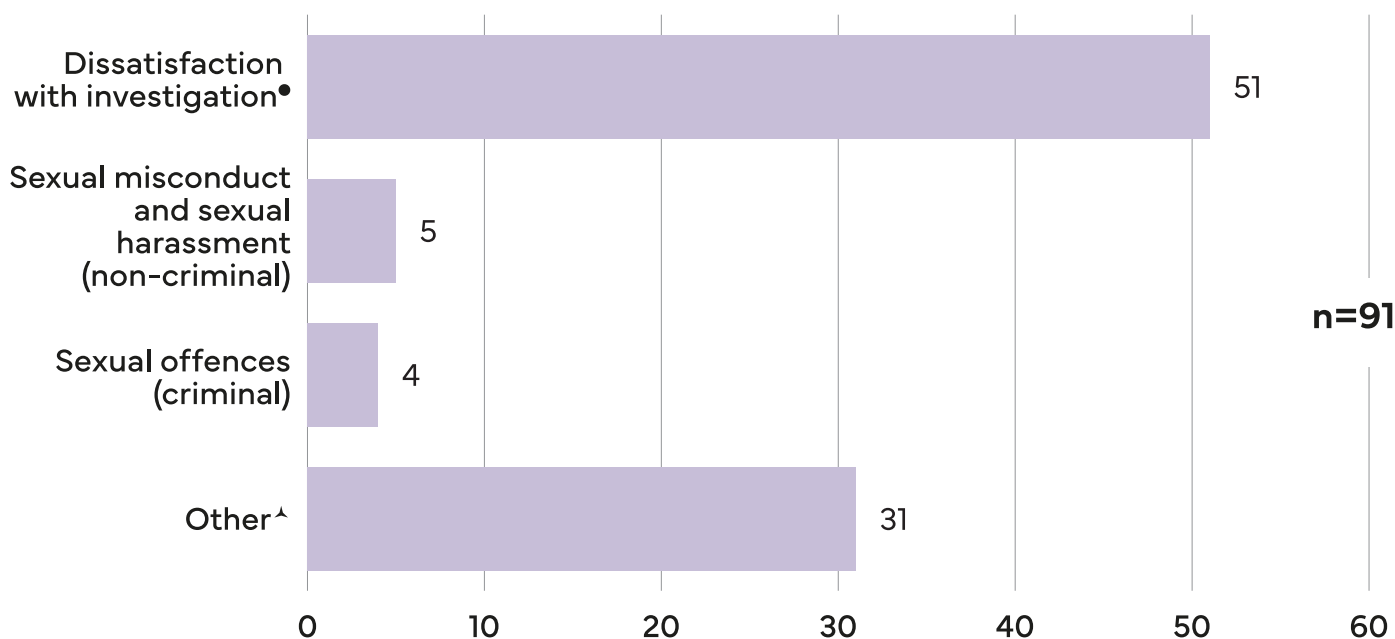


Figure 6: Number of cases logged by nature of complaint, 1 January 2024 to 31 December 2024



● Dissatisfaction with investigation may include reasons such as conduct during arrest, illegal interview, lack of investigation updates and lack of victim updates.

^ In line with the JSP 200 directive on statistical disclosure control, numbers fewer than three have been suppressed. These categories have been grouped together as 'Other'. This includes 'Discrimination or Equality Act', 'Death or serious injury', 'Fraud', 'Perverting the course of justice' as well as those which fall outside the listed categories.

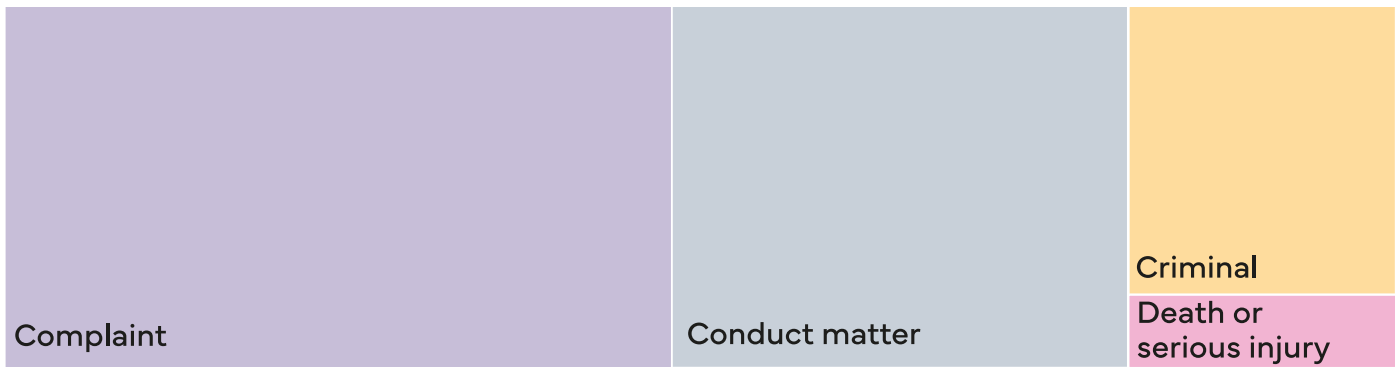
Looking at the nature of complaints, most logged cases from PSDs fall into the 'Dissatisfaction with investigation' category.

Figure 7: Number of cases logged by locations, 1 January 2024 to 31 December 2024



One of the repeated requests from stakeholders during the Commissioner's engagements was to understand the proportion of complaints from overseas. Figure 7 presents all 91 logged cases, broken down by location. While the number of logged and recorded cases, and the number of logged cases from the UK, both total 74, this is purely coincidental. It does not imply that all logged and recorded cases are from the UK.

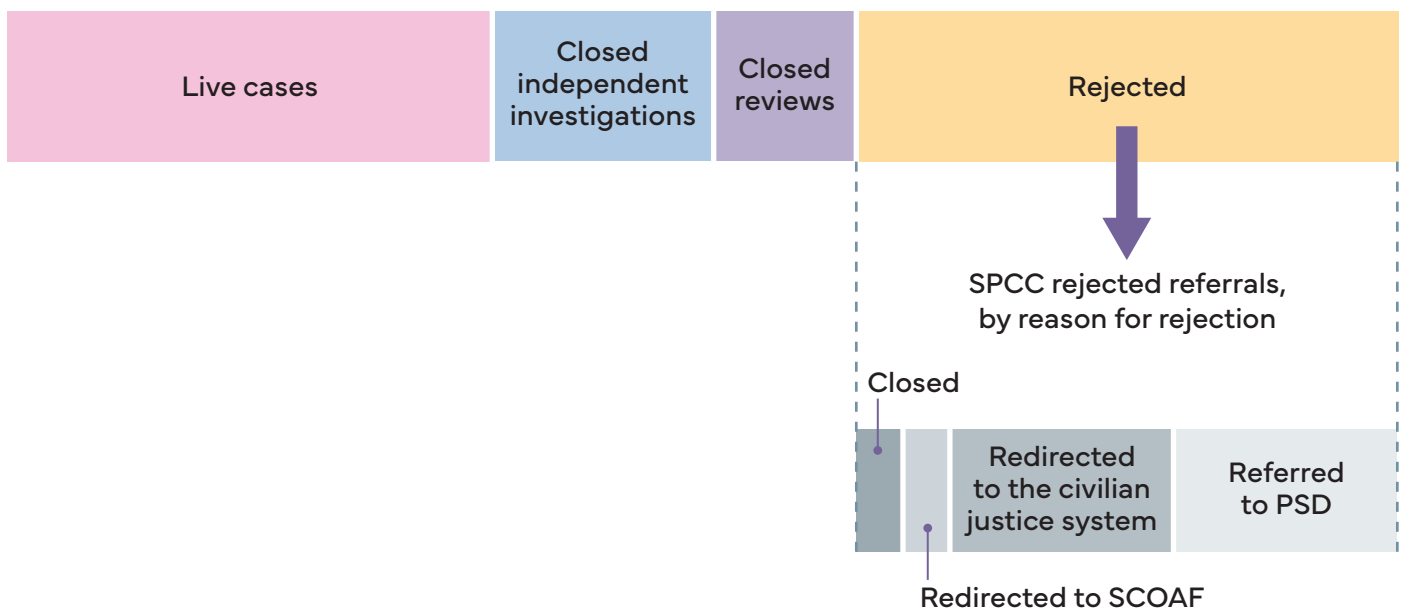
Figure 8: Illustrative proportion* of cases logged by type of enquiry, 1 January 2024 to 31 December 2024



*In line with the JSP 200 directive on statistical disclosure control, numbers fewer than three have been suppressed. Therefore, scales have been left off this graph. Figure 8 is not drawn to scale and should be used for illustrative purposes only.

Figure 8 reflects the type of enquiry. Most cases are complaints, and a notable proportion involve conduct matters, with criminal matters coming in a close third. Please note criminal matters always involve conduct matters but conduct matters do not necessarily involve criminal aspects.

Figure 9: Proportion of SPCC referrals by status 1 January 2024 to 31 December 2024**



**In line with the JSP 200 directive on statistical disclosure control, numbers fewer than three have been suppressed. Therefore, scales have been left off this graph. Figure 9 is not drawn to scale and should be used for illustrative purposes only.

Figure 9 shows what happened after the referrals were made to the SPCC. There were 31 referrals in 2024, and a number were rejected. From those, a proportion of referrals were redirected to the criminal justice system, or to the appropriate PSD. From the 31 referrals, 14 investigations were initiated. However, a small number had to be closed, as explained later on page 28, under the heading ‘Closed investigations’.

Recommendation

- 2 That PSDs continue to work with the SPCC on the collection of data so that suitable software can be identified that will automatically generate data for statistical analysis. This will ensure uniformity of approach in how complaints and conduct matters are categorised and assessed.

Demographics of complainant

As part of the commitment to increasing confidence in the complaints system, particularly among groups that traditionally have lower levels of trust, including those from ethnic minority backgrounds and women, it is important to monitor the equality of service provided to all complainants.

However, it should be noted that in the majority of cases the equality of service monitoring form was either not completed or information was incomplete. The response rate ranged between 21% and 42% depending on the specific question.

It cannot be assumed that those who chose to complete the form are representative of their respective population, and as such, the data should be interpreted with caution.

- 39% of complainants who provided information were female.
- 17% of complainants who provided information identified as belonging to an ethnic minority group.

In future, the SPCC should consider strategies to improve the completion of the equality of service monitoring forms, enabling more reliable analysis and targeted improvements.

Closed investigations

In 2024, three investigations were closed on the grounds that the alleged conduct occurred prior to the Regulations coming into force on 19 June 2023 (see Regulation 1). Complaints about events that occurred before this date fall outside the scope of the statutory Service Police complaints system. Such cases continue to be managed under the non-statutory arrangements administered by the respective Provost Marshals. The jurisdictional limitation presents a significant challenge.

In contrast, the civilian complaints system, under the Police Reform Act 2002, provides a mechanism via section 28A(3) and Regulation 4 of The Police (Complaints and Misconduct) Regulations 2020 for the Director General of the Independent Office for Police Conduct to bring older cases within statutory scope.

It is recommended that consideration be given to amending the Regulations to provide a discretionary or exceptional jurisdiction to the SPCC for investigating historic cases, similar to that available to the Independent Office for Police Conduct. This would enable the SPCC to consider and investigate cases where the complaint predates the Regulations, regardless of when the alleged misconduct occurred. Any future amendment process should also involve a broader review of the Regulations to ensure that all necessary adjustments can be considered and, if appropriate, implemented simultaneously.

Recommendation

- 3 That the MOD provides appropriate resources to conduct a review into whether the current Regulations should be amended to include historic cases, in exceptional circumstances, and assess what this would mean for the SPCC in terms of caseload.

Increasing awareness and the number of complaints

As the SPCC becomes more established and messaging about the role continues to gain traction, it is anticipated that the number of complaints will increase. This should not be viewed as a negative development. Rather, it is a positive indicator of growing awareness and public confidence in the independence and accessibility of the Service Police complaints system.

In support of this aim, a focus group was commissioned to inform the development of the SPCC's branding and communication strategy. The feedback provided was both insightful and instructive. Several key themes emerged:

- there is a lack of awareness of the SPCC's role among the target audience
- it is important to communicate that the SPCC is independent of the Service Police
- communications must provide assurance that decisions made by the Commissioner are fair, balanced and impartial, serving the interests of all parties
- all messaging must be clear, accessible, and inclusive to reach the widest possible audience

These findings are now shaping the SPCC's outreach approach, with targeted effort aimed at building trust and ensuring that all members of the Service community understand their right to complain, and the role of the SPCC in safeguarding that right. Chapter 3 covered operation of the SPCC, engagement, and the ambassadorial role played by the Commissioner. Stakeholders are encouraged to play an active part in increasing awareness of the SPCC's function and purpose. Strong consistent messaging from across the Defence community will be vital in embedding a culture of accountability and confidence in the oversight system.

Recommendation

- 4 That the MOD assists in highlighting the role of the SPCC and helps to provide resources for a robust communication strategy given Defence's global reach.



5

Service Police super-complaints

Super-complaints system

Background

The Service Police super-complaints system is governed by Part 4 of the Regulations. His Majesty's Chief Inspector of Constabulary (the Chief Inspector) and Commissioner both have statutory obligations under the Regulations. The Regulations envisage a joint process, involving the Chief Inspector and the Commissioner.

The Service Police super-complaints system enables designated bodies (as listed below) to raise issues or concerns on behalf of the public about a feature or features of policing in one or more of the Service Police forces that is, or appears to be, significantly harming the interests of the public. See Regulation 88 of the 2023 Regulations. An example of a feature of policing is how the Service Police investigate domestic abuse.

Designated bodies with the super-complaints system

- Advocacy After Fatal Domestic Abuse – www.aafda.org.uk
- The Centre for Military Justice – centreformilitaryjustice.org.uk
- Royal Air Forces Association – www.rafa.org.uk
- Salute Her UK – www.saluteher.co.uk

How we investigate

To be eligible for investigation, a super-complaint must comply with the requirements set out in Regulation 92 of the 2023 Regulations. In summary, super-complaint investigations usually focus on four investigative questions:

- Is there a feature of policing?
- Is significant harm being caused?
- Does the feature of policing cause the significant harm?
- If it is not the feature of policing causing the harm, what is?

Where a super-complaint is eligible for consideration, the Chief Inspector and the Commissioner have a number of tools available to investigate the matter, including conducting interviews with Service Police officers and with victims, complainants or others affected, as well as seeking and analysing data.

The Chief Inspector and the Commissioner have powers in relation to the investigation (Regulation 97) and information sharing (Regulation 98). These include the power to request advice, inspect premises, and for His Majesty's Inspectorate of Constabulary and Fire and Rescue Services and the SPCC to share information with each other.

At the conclusion of the investigation, the Chief Inspector and the Commissioner then make such recommendations to any person as they consider appropriate (Regulation 96).

Duties of His Majesty's Chief Inspector of Constabulary and the SPCC

Chapter 3 of Part 4 of the Regulations sets out duties in relation to super-complaints. These include duties to:

- acknowledge receipt of the super-complaint: Regulation 93 (Chief Inspector)
- determine eligibility for consideration: Regulation 94 – note that this duty falls on both the Chief Inspector and the Commissioner
- provide progress reports: Regulation 95 – this includes a requirement for an explanation (see Regulation 95(2)) **“of the steps the Chief Inspector and the Commissioner have taken in relation to the investigation”** (Chief Inspector)
- report the outcome of the investigation: Regulation 96 – this is triggered **“[w]hen the Chief Inspector and the Commissioner have concluded an investigation of a super-complaint”** (Chief Inspector)



6

Concluding remarks

Priorities

To deliver on the Commissioner's mandate, the Office of the SPCC must operate within a robust and sustainable operating model that reflects the full complement of statutory duties. This is not only critical to the effective discharge of the functions of the Commissioner, but also central to maintaining public and stakeholder trust in the independence, integrity, and capability of the Office.

To ensure the SPCC continues to strengthen its operational effectiveness and public confidence, three key priorities have been identified for delivery in 2025.

- **Establish a robust governance framework:** Finalise the development of a comprehensive governance model, with clear structures, policies, and assurance mechanisms. This framework will be publicly accessible via the SPCC's external website to reinforce transparency and accountability.
- **Appropriate resourcing:** Secure sufficient and sustainable staffing and funding to support the full execution of the SPCC's statutory functions, ensuring the Office can respond effectively to increased activity and complexity. Aligned to this, further enhance the depth and contextual accuracy involving Service Policing practices. It is suggested that resources are provided for the Office to have a suitably qualified Subject Matter Expert in Service Policing permanently assigned to the SPCC. The Subject Matter Expert would serve in an advisory capacity only, providing consultative support without compromising SPCC independence.
- **Development of oversight tools:** Implement a structured dip sampling programme and support the development of an anti-corruption oversight function, reinforcing the SPCC's role in identifying emerging risks and promoting ethical conduct within the Service Police.



The recommendations

Below is a recap of all the recommendations.

Recommendation

- 1 That the MOD prioritises and facilitates appropriate platforms to ensure the SPCC can inform stakeholders, including the Service boards, of their responsibilities under the Regulations.

Recommendation

- 2 That PSDs continue to work with the SPCC on the collection of data so that suitable software can be identified that will automatically generate data for statistical analysis. This will ensure uniformity of approach in how complaints and conduct matters are categorised and assessed.

Recommendation

- 3 That the MOD provides appropriate resources to conduct a review into whether the current Regulations should be amended to include historic cases, in exceptional circumstances, and assess what this would mean for the SPCC in terms of caseload.

- 4 That the MOD assists in highlighting the role of the SPCC and helps to provide resources for a robust communication strategy given Defence's global reach.

Conclusion

The Office of the SPCC has worked exceptionally hard to establish the foundational infrastructure and operational processes of the SPCC, while also delivering on core statutory functions, including the investigation of complaints, conduct matters, and criminal allegations. These achievements are significant and reflect the commitment and professionalism of a small, dedicated team.

The Commissioner feels deeply privileged to serve in this role, entrusted with the responsibility to help build and maintain trust in the Service Policing system.

While the Commissioner remains deeply grateful to the individuals and institutions outside the SPCC who have supported the Commissioner's endeavours, this reliance is not sustainable. Certain functions, such as the handling of super-complaints, require the impartiality and independence that only this Office can provide.

Trust is the foundation of effective policing, particularly within the Armed Forces. It underpins not only community protection but also operational effectiveness, as policing plays a crucial role in enabling the Armed Forces to function lawfully and cohesively.

The SPCC carries the responsibility of ensuring that the Service Police operate with integrity, fairness, and accountability.

To uphold this trust, the SPCC must not only commit to professional excellence but also promote a cultural shift within the system – one that embraces independent oversight as a strength rather than a threat. For the SPCC to succeed in this mission, the Office must be adequately resourced, both in capability and capacity, to challenge without fear, act independently, and safeguard the principles on which modern policing is built.

The Commissioner's vision is for this Office to be recognised as a trusted, independent voice in Service Police governance, equipped to drive reform and inspire confidence in persons subject to Service law and discipline. This will enable the SPCC to foster a culture of continuous improvement and accountability. The Commissioner is committed to transforming the SPCC into an agile and innovative operational unit, capable of delivering sustained impact across Defence.

